

Addressing the Intersection of Homelessness and Immigration

2025 NATIONAL CONFERENCE ON
ENDING HOMELESSNESS



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Increasingly aggressive immigration policies have forced providers into the hottest-button issue in national politics. Come learn how advocates and communities are responding to recent Executive Orders, ICE raids on shelters, and other concerning developments to ensure that providers and clients know their rights and remain safe and supported.



What is PRWORA? What is SAVE?

- The Personal Responsibility and Work Reconciliation Act (PRWORA) is a federal law enacted in 1996 that restricts eligibility for “Federal public benefits” to citizens and “qualified non-citizens” (QNCs).
- The Systematic Alien Verification for Entitlements (SAVE) is an online service used by registered federal, state, and local government agencies to verify immigration status.
- SAVE is an automated computer matching system:
 - The user agency inputs an individual’s self-attested immigration status and other personal information
 - Then SAVE confirms whether the self-attested immigration status matches DHS’s records.

Qualified Non-Citizens

- lawful permanent residents, or LPRs (people with green cards);
- refugees, people granted asylum or withholding of deportation/removal, and conditional entrants;
- people granted parole by the U.S. Department of Homeland Security (DHS) for a period of at least one year;
- Cuban and Haitian entrants;
- certain abused immigrants, their children, and/or their parents;
- certain survivors of trafficking; and
- individuals residing in the U.S. pursuant to a Compact of Free Association (COFA).

Source: National Immigration Law Center, Overview of Immigrant Eligibility for Federal Programs (May 1, 2024) at 2-3, available at <https://www.nilc.org/resources/overview-immeligfedprograms/>; 8 U.S.C. §§ 1611(a) (restricting Federal public benefits to citizens and “qualified aliens”), 1641(b) (defining “qualified alien”).

Relevant Federal Guidance

- Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility Under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 62 Fed. Reg. 61344, at 61345 (Nov. 17, 1997) (“DOJ Guidance on Verification”):
<https://www.federalregister.gov/documents/1997/11/17/97-29851/interim-guidance-on-verification-of-citizenship-qualified-alien-status-and-eligibility-under-title>
- 2016 HUD Fact Sheet - The Personal Responsibility and Work Opportunity Act of 1996 and HUD’s Homeless Assistance Programs:
<https://files.hudexchange.info/resources/documents/PRWORA-Fact-Sheet.pdf>

Important Considerations

Verification of
Citizenship/QNC
Status

Non-Profit vs.
State/Local
Government
Recipient

Exempt vs. Non-
Exempt
Services/Benefits

When Denial or
Termination is
Required

Compliance,
Enforcement, and
False Claims Act



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Disclaimer: The information in this presentation is meant for educational purposes only and not intended or offered as legal advice.



501(c)(3) Entities

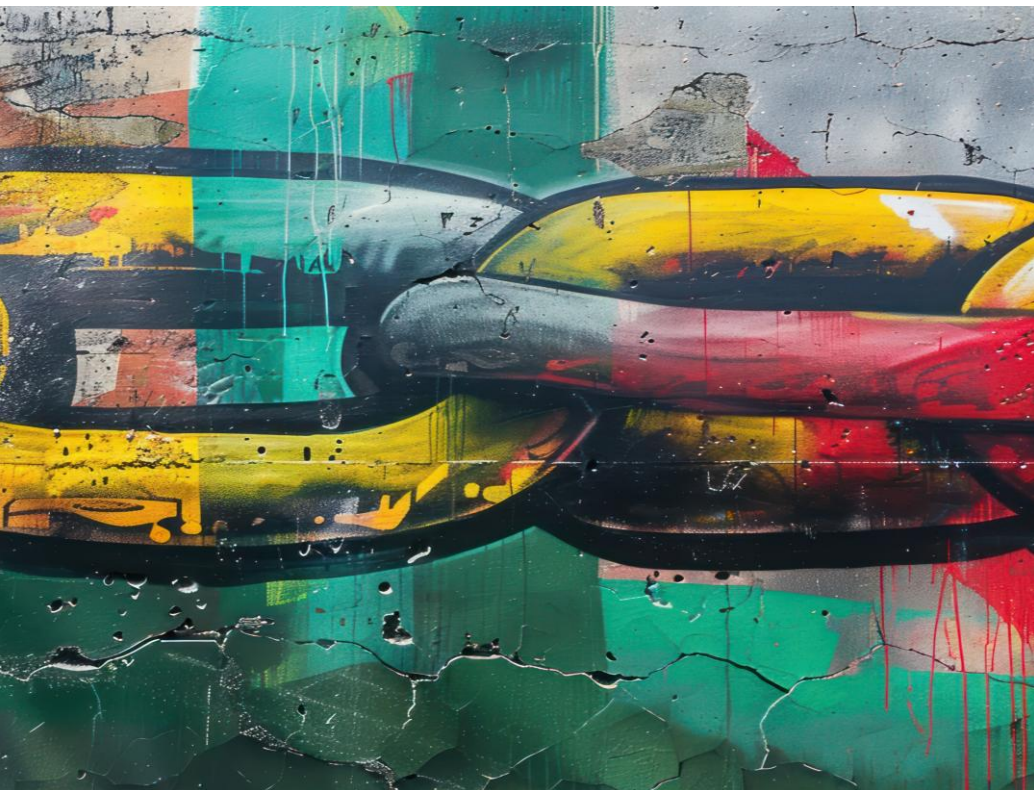
Internal Revenue Code: §501(a) & §501(c)(3)

- **IRC § 501(a):** *“An organization described in subsection (c)... shall be exempt from taxation....”*
- **IRC § 501(c)(3):** *“Corporations, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals....”*

501(c)(3) Entities

IRC §501(c)(3) continued....

“...no part of the net earnings of which inures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting, to influence legislation (except as otherwise provided in subsection (h)),



Executive Orders

White House

<https://www.whitehouse.gov/briefing-room/presidential-actions/>

National Council of Nonprofits – last updated June 23, 2025:

<https://www.councilofnonprofits.org/files/media/documents/2025/chart-executive-orders.pdf>



Risk Management Building Blocks



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Corporate Organization

Policies

Insurance

Communication Plan

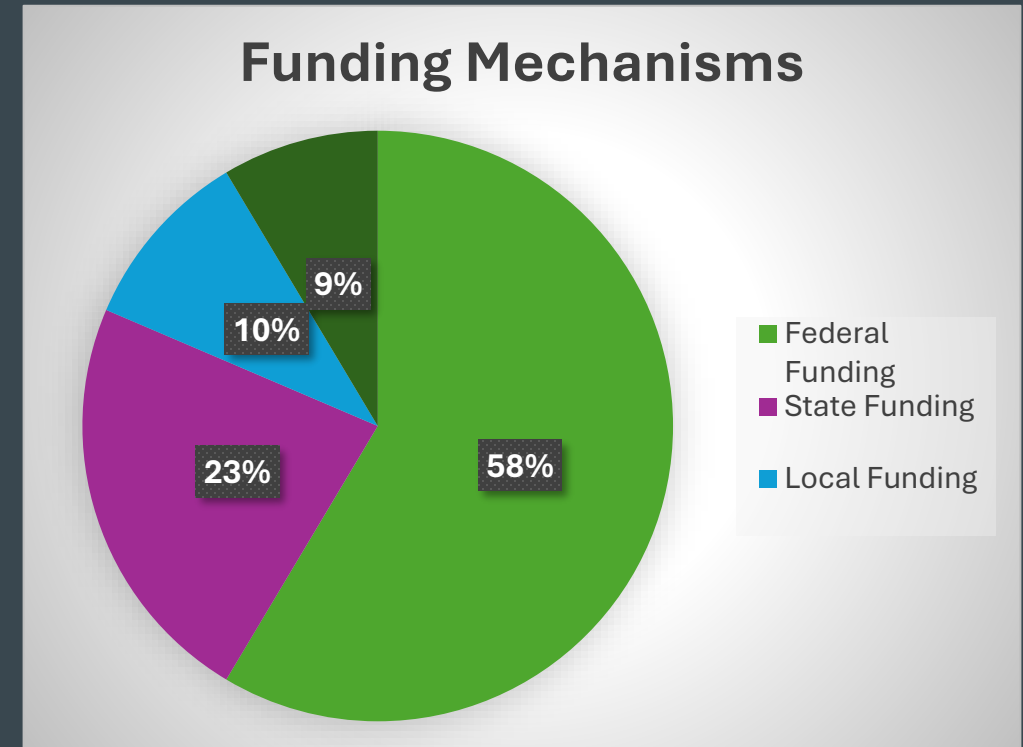
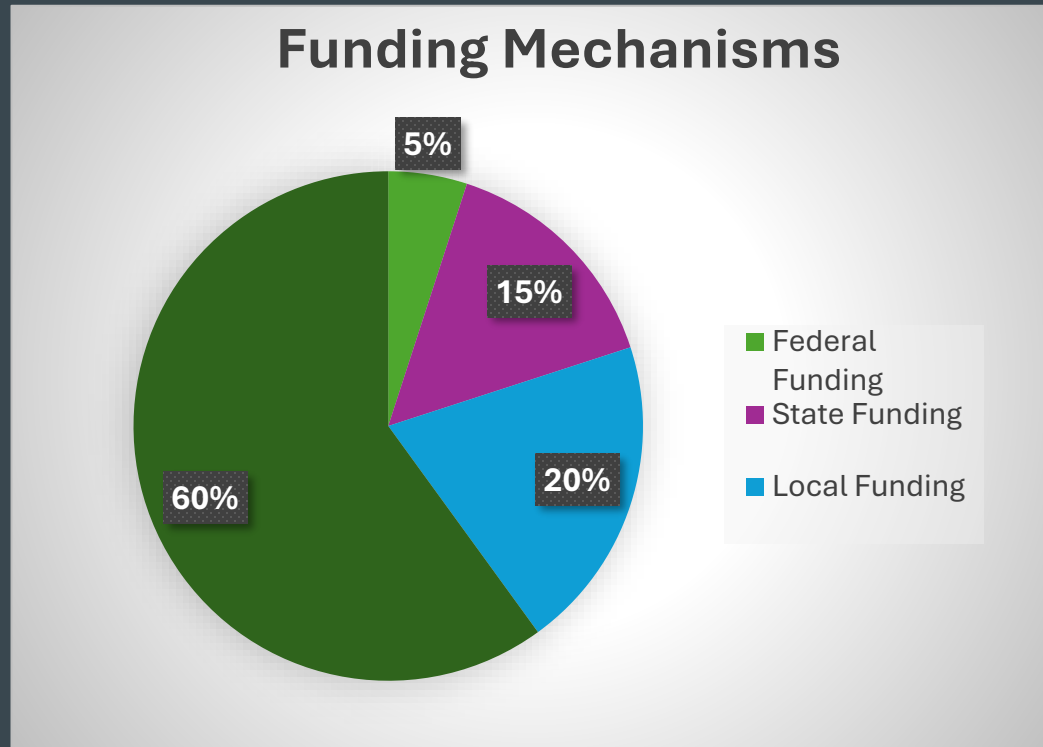
Training

Risk Audit

Messaging

Risk Audit

What is Your Risk – Harden Your Target





Control Your Message (PR)

- ✓ Social Media Policy
- ✓ Speak with same voice (requires training and education)
- ✓ Use your corporate filings as a tool to educate
- ✓ Stick to the Mission

