

CITY AND COUNTY OF SAN FRANCISCO

BOARD OF SUPERVISORS

BUDGET AND LEGISLATIVE ANALYST

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TO: Budget and Finance Committee

FROM: Budget and Legislative Analyst



SUBJECT: November 12, 2025 Budget and Finance Committee Meeting

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Item 1 File 25-1080	Department: Mayor's Office of Housing and Community Development
EXECUTIVE SUMMARY	
Legislative Objectives - The proposed ordinance would appropriate \$3.5 million from the General Reserve to the Mayor's Office of Housing and Community Development (MOHCD) to fund the following in FY 2025-26: (1) \$1.86 million to community-based organizations that provide immigration legal defense, and (2) \$1.64 million to community-based organizations for coordinated response services. Key Points - MOHCD is the primary administrator of the City's grants on immigration legal services to community-based organizations. In FY 2025-26 and FY 2026-27, MOHCD's budget for immigration legal services is \$12,339,016 for each fiscal year, which funds a total of 12 agencies across various program areas. The proposed appropriation will fund the expansion of existing citywide coordinated services for immigration legal defense and response efforts serving immigrant communities. This includes expanded staffing to provide legal consultations and representation, upgraded technology and communications infrastructure, and increased outreach. - MOHCD has not identified specific community-based organizations and programs to be funded, as the Department will determine the procurement approach and funding methodology following approval of the proposed ordinance. Fiscal Impact - The proposed ordinance would appropriate \$3.5 million from the General Reserve to the MOHCD's community-based services accounts, which the Department plans to allocate to legal defense and response services. - Any uses of the General Reserve during the current year (FY 2025-26) will increase the required deposit in the budget year (FY 2026-27) by a like amount. Policy Consideration - We recommend the Mayor's Office consider the following factors when determining funding allocations to service providers: (1) Barriers to access (e.g., linguistic, cultural) impacting service reach, (2) Vulnerable marginalized communities disproportionately impacted by the recent uptick in immigration enforcement, (3) Performance of providers, (4) Capacity of providers and whether funded providers can staff up quickly, and (5) Cost effectiveness and how costs of services compare among providers. Recommendation - Approval of the proposed ordinance is a policy matter for the Board of Supervisors.	

MANDATE STATEMENT

City Charter Section 9.105 states that amendments to the Annual Appropriations Ordinance, after the Controller certifies the availability of funds, are subject to Board of Supervisors approval by ordinance.

BACKGROUND

The Mayor's Office of Housing and Community Development (MOHCD) is the primary administrator of the City's grants on immigration legal services to community-based organizations. As shown in Exhibit 1 below, in FY 2025-26 and FY 2026-27, MOHCD's budget for immigration legal services is \$12,339,016 for each fiscal year, which funds a total of 12 agencies across various program areas. This funding level was a decrease from the \$13,140,826 budgeted in FY 2024-25.

Exhibit 1: MOHCD Immigration Legal Services Funding in FY 2025-26 and FY 2026-27

Service Types	Providers	FY 2025-26 Budget	FY 2026-27 Budget
Immigration Legal Services	Central American Resource Center of Northern California (CARECEN), Mission Action, Open Door Legal, Legal Assistance to the Elderly, Legal Services for Children, The LGBT Asylum Project, La Raza Centro Legal, Asian Law Caucus, The African Advocacy Network, La Raza Community Resource Center	\$3,723,505	\$3,723,505
Immigrant Legal Defense Collaborative	Central American Resource Center of Northern California (CARECEN) and 15 other organizations	\$6,790,077	\$6,790,077
Rapid Response Network Hotline	Mission Action	1,528,457	1,528,457
Immigrant Labor Union Services	SF CLOUT (WE RISE SF)	196,977	196,977
Health and Human Rights Initiative	University of California, San Francisco	100,000	100,000
Total		\$12,339,016	\$12,339,016

Source: MOHCD and BLA

As shown above, the largest program receiving funding is the Immigrant Legal Defense Collaborative, a consortium of sixteen legal organizations providing services to immigrants facing removal proceedings. MOHCD also directly funds non-profits that provide routine legal services for immigrants and a rapid response program for the immediate legal needs of immigrants.

DETAILS OF PROPOSED LEGISLATION

The proposed ordinance would appropriate \$3.5 million from the General Reserve to the Mayor's Office of Housing and Community Development (MOHCD) to fund the following in FY 2025-26:

(1) \$1.86 million to community-based organizations for immigration legal defense, and (2) \$1.64 million to community-based organizations for response services.

According to MOHCD, specific community-based organizations and programs to be funded have not yet been identified, as the Department will determine the appropriate procurement approach following approval of the proposed ordinance by the Board of Supervisors. These determinations will inform the timeline for fund disbursement. In addition, the specific number of staff positions to be potentially funded will be determined during the grant negotiation process.

Exhibit 2 below shows MOHCD's overview of anticipated services to be funded by the proposed appropriation.

Exhibit 2: Services to be Funded by Proposed Appropriation in FY 2025-26

Program Area	Proposed Services
Legal Defense (\$1.86 million)	• Additional full-time attorneys and paralegals to respond to immigration-related needs and better support caseloads • Additional attorneys to provide local response services and representation in immigration courts • Expand existing attorney capacity to provide additional technical expertise, standardized resources, and court practice guidance to partners and stakeholders
Response Services (\$1.64 million)	• Additional trained dispatchers, paralegals, and other staff to manage time-sensitive immigration-related cases, complete client intakes, and coordinate rapid communications to on-call responders and legal representation • Upgrade technology and communication systems and tools (such as HIPAA/FERPA¹-compliant data storage and multi-channel text/call/chat mobile systems) to provide real-time, secure coordination among legal representation partners, dispatchers, and field teams • Development of secure web and mobile platforms that support coordinated intake, case tracking and data analytics • Additional Know Your Rights workshops and multi-lingual public education campaigns • Improve shared referral and case-tracking systems, and convene regular coordination meetings and case reviews among providers

Source: MOHCD

MOHCD states that proposed services were identified based on the Department's institutional knowledge of the landscape of immigration legal defense and response services and community needs. In addition, the Department conducted a review of procurement proposals, funded

¹ FERPA stands for Family Educational Rights and Privacy Act, which is a federal law that protects the privacy of student educational records.

activities, outcomes and grant reports in 2024 of the immigration legal services grant portfolio to identify effective strategies and inform future funding opportunities.

FISCAL IMPACT

The ordinance would appropriate \$3.5 million from the General Reserve to the MOHCD, as shown in Exhibit 3 below.

Exhibit 3: Proposed Appropriation

Sources	Amount
General Reserve	\$3,500,000
Total Sources	\$3,500,000

Uses	Amount
Legal Defense for Immigrants (Community-Based Organizations TBD)	\$1,860,000
Response Services (Community-Based Organizations TBD)	1,640,000
Total Uses	\$3,500,000

Source: MOHCD and Proposed Ordinance

The appropriation is for MOHCD's community-based services account, which the Department plans to allocate to legal defense and response services. As shown above, of the \$3.5 million proposed appropriation, \$1.86 million (53.1 percent) will fund community-based organizations providing immigration legal defense, and \$1.64 million (46.9 percent) will fund community-based organizations providing response services.

General Reserve

The General Reserve balance for the current fiscal year is approximately \$164.3 million. The proposed \$3.5 million appropriation from the General Reserve would reduce that balance accordingly, and any amount used from the General Reserve in the current fiscal year must be replenished in the following fiscal year pursuant to the City's reserve policies. The General Reserve balance is required to be 2.5 percent of budgeted regular General Fund revenues in FY 2025-26 and 2.75 percent in FY 2026-27.

POLICY CONSIDERATION

As previously mentioned, MOHCD has not finalized how the proposed funding will be distributed. Consequently, we recommend the Mayor's Office consider the following factors when determining funding allocations to service providers:

- **Barriers to Access:** Are any linguistic, cultural, transportation or any other barriers impacting service reach? If so, would the proposed funding address those service gaps?

- **Vulnerable Marginalized Communities:** Are any marginalized communities and/or subcommunities (such as DACA recipients², unaccompanied minors, Indigenous migrants, and family members of deported individuals facing financial instability) disproportionately impacted by the recent uptick in immigration enforcement? If so, how will the proposed funding address that?
- **Performance of Providers:** Are providers meeting performance expectations? This may include service/outcome objectives such as the number of completed cases, outcomes of immigration cases, client satisfaction, number of clients served, number and percentage of clients referred to and assigned a lawyer, and deportation prevention outcomes.
- **Capacity of Providers:** Can those receiving additional funding staff up quickly?
- **Cost Effectiveness:** How do the costs of services compare among providers? Are there opportunities to fund lower cost services within the existing provider portfolio?

RECOMMENDATION

Approval of the proposed ordinance is a policy matter.

² A Deferred Action for Childhood Arrivals (DACA) recipient is an individual who has been granted temporary protection from deportation and a renewable work permit through the DACA program.