



FAQs Regarding Immigration Enforcement Actions

Various offices on campus have asked for guidance about what to do if U.S. Immigration and Customs Enforcement (ICE) agents arrive on campus as part of an immigration law enforcement action in light of recent changes to ICE guidance regarding enforcement actions at schools and other sensitive areas. This document is meant to provide guidance to frontline employees in such an event.

Are college and university campuses still defined as “sensitive” or “protected” locations where ICE enforcement actions are limited?

- No. On January 21, 2025, the Acting Secretary of the Department of Homeland Security (DHS) announced the rescission of prior ICE guidance on “sensitive” or “protected” locations. Since 2011, ICE had operated under internal guidance memoranda that prohibited ICE agents from engaging in enforcement actions (arrests, interviews, searches, or surveillance) at “sensitive locations” such as colleges and universities, with limited exceptions. That internal ICE guidance is no longer in place.

Does law enforcement need a warrant to access L&C’s campus?

- L&C is a private college and our campus is private property. Although certain areas of campus are generally open to members of the public (such as the Estate Gardens), access to most campus buildings and to some outdoor areas is limited to students, residents, employees, and/or invited guests, depending on the specific building or space. Areas with access limitations (such as residence hall buildings, student centers, academic and classroom buildings, laboratories, and faculty and staff offices) are non-public areas.
- Law enforcement agents must have a judicial search or arrest warrant signed by a judge of a federal or state court (as opposed to an administrative warrant) to access nonpublic areas of campus.

What should an employee do if agents ask to enter non-public areas of a college building?

- The employee should ask agents to wait to enter any nonpublic areas and should immediately contact Campus Safety dispatch at 503-768-7777. If there is no answer, call 503-593-5457.
- Campus Safety will come to meet with the agents, and will also attempt to contact the college’s General Counsel or other senior administrative leader for assistance.
- Faculty and staff are not authorized to permit agents to enter nonpublic areas without a warrant and are not authorized to accept service of a warrant or subpoena on behalf of the college.
- The employee should remain polite and may wish to say, “I understand you are here for law enforcement purposes, but I am not authorized to grant you permission to enter nonpublic areas or accept any documentation on behalf of the college. I am not obstructing your process, but I do need to refer this to appropriate college personnel.”

- See the attached **Scenario-Based Sample Scripts for Frontline Staff** at the end of this document for additional sample talking points.
- If an agent forces their way in, call Campus Safety immediately and alert your supervisor. **Under no circumstances should you attempt to physically obstruct or interfere with a law enforcement agent's activity.**
- Federal law under 8 U.S.C. § 1324 makes it a crime to knowingly harbor, shield, or transport undocumented individuals to evade detection by immigration authorities.
- Campus Safety and/or the General Counsel, or another senior administrative leader, will review any warrant or subpoena carefully.

What should employees do if a law enforcement agency contacts them and asks for information about a student or a student's education record?

- An employee who receives an in-person request from law enforcement for information about a student (including "directory information" as defined in L&C's [FERPA Policy](#)) or for access to college records or property, should immediately contact Campus Safety dispatch at [503-768-7777](#). If there is no answer, call [503-593-5457](#). Campus Safety will attempt to contact the college's General Counsel or other senior administrative leader for assistance.
- The employee may wish to say, "I understand you are requesting student information, which, consistent with the college's legal confidentiality obligations under FERPA, I am not authorized to provide. Your request needs to be directed to the General Counsel."
- Employees who receive a subpoena of any kind, whether it is from a government agency or third-party, or other written request for student information, should immediately direct the subpoena to the Office of General Counsel at reese@lclark.edu (or 503-768-7696), with a copy to lthomas@lclark.edu. The General Counsel will determine the college's obligations regarding the subpoena and respond accordingly. In doing so, the college will comply with the Family Education Rights and Privacy Act (FERPA).
- FERPA generally prohibits schools from disclosing personally identifiable information from a student's education records, with certain exceptions. The most important exception to FERPA's general rule prohibiting disclosure of a student's education records is when disclosure is done pursuant to a lawfully issued subpoena. Again, it is up to the General Counsel to determine the college's legal obligations pursuant to a subpoena.
- An additional exception to privacy protections are immigration records for foreign nationals sponsored by the institution. Colleges are required to exchange data with federal immigration agencies on the status of international students on F-1 and J-1 visas through use of a government database named "SEVIS," which is part of the Student and Exchange Visitor Program (SEVP). In addition, certain information about those students is required to be retained and produced by the College upon request from DHS and ICE. If an individual states that they are requesting documents under the authority of the SEVP, direct them to the General Counsel, at reese@lclark.edu (or 503-768-7696), with a copy to lthomas@lclark.edu, who will work with the Office of International Students & Scholars to respond. For specific questions about

international students or their SEVIS records, contact the Office of International Students & Scholars at 503-768-7307.

What if federal officers arrive on campus to confirm the status of international students?

- Federal officers may conduct unannounced site visits to confirm that sponsored foreign nationals are employed or studying as described in the institution's approved immigration application. Such site visits do not require a warrant or subpoena. Federal immigration officers generally have no greater access to personnel records than any member of the public unless they have a valid subpoena or I-9 Notice of Inspection.
- Inform the officer that you need to contact Campus Safety and that their request needs to be reviewed by the General Counsel or the Office of International Students & Scholars. You might say, "Thanks for reaching out. For SEVIS audits or site visits, we follow our standard procedures. We don't discuss individual students without going through the proper process. SEVIS document requests need to be provided to our General Counsel for review, who will work with the Office of International Students & Scholars to respond. I can contact them right away." Then contact Campus Safety.

What if federal officers arrive on campus for the purpose of employment eligibility inspection?

- Immigration officers may arrive unannounced to inspect I-9 records or conduct an administrative site visit for a compliance review. If the purpose of the visit is to inspect I-9 records, the employer does not have to consent to a same-day inspection. Immigration officers tend to arrive at the workplace and request to inspect the I-9s immediately, but the law provides employers three days to respond to an I-9 Notice of Inspection. Employers should always request the three days to respond in order to have the opportunity to organize I-9 records and respond in an orderly manner. Any I-9 Notice of Inspection should be sent directly to the Office of General Counsel immediately.

What should employees do if they observe ICE agents/officers on campus?

- Agents from DHS, which includes ICE, or other federal agencies, may appear on campus for a variety of reasons. As noted above, ICE may come to campus for reasons related to regulations that do not involve alleged immigration violations. It is a mistake to assume that any ICE employee visiting campus is present as part of an enforcement action. Rumors about ICE enforcement actions on campus can spread anxiety, making it important to verify the actual reasons for their presence.
- If you encounter ICE or other law enforcement agents on campus and are concerned about their activities, you should immediately contact Campus Safety dispatch at 503-768-7777. If there is no answer, please call 503-593-5457.

- Employees should remain polite but should also document any concerning activities they observe, if it is safe and possible to do so.

What should I do if somebody asks me for help regarding an immigration-related issue?

Although the college cannot give legal advice, we have compiled a list of resources that can be easily shared. You can refer such requests to [Resources for Immigrant Members of the LC Community](#).

The Higher Education Immigration Portal also provides various [Know Your Rights resources](#).

Scenario-Based Sample Scripts for Frontline Staff¹

Talking points for staff (e.g., student services staff, administrative staff, etc.) who may encounter immigration or other law enforcement officials on campus. These talking points focus on common scenarios. Frontline responders may feel pressure or uncertainty during an unexpected encounter, so please review these scenario-based scripts in advance.

Although it is important to follow internal protocols, **college employees should never attempt to obstruct, interfere, or impede law enforcement activities.**

Federal law under 8 U.S.C. § 1324 makes it a crime to knowingly harbor, shield, or transport undocumented individuals to evade detection by immigration authorities.

If an officer approaches in person:

“Good morning/afternoon. How can I help you today?”

(Let the officer explain their purpose.)

“Okay, thank you. Before I can assist further, I’ll need to contact the Office of Campus Safety. Campus Safety is responsible for handling the college’s interactions with law enforcement.”

(If they present a document)

“Thank you. I need to contact the Office of Campus Safety to review this before proceeding. Please wait here while I contact them.”

(If they refuse to provide ID or any identifying information)

Frontline staff should not challenge or block the person’s movement, but should immediately notify Campus Safety and alert their supervisor.

(If they request you provide access to a non-public area of campus)

“I understand you are here for law enforcement purposes, but I am not authorized to grant you permission to enter non-public areas. I am not obstructing your process, but I do need to refer this to appropriate college personnel. I am contacting Campus Safety now.”

¹ These materials were developed based on resources provided by the [Presidents’ Alliance on Higher Education and Immigration](#).

(If the officer refuses to wait and pushes forward)

Immediately contact Campus Safety and document the interaction. Include the date, time, agency name, officer names, badge numbers, any documents presented, and a summary of what transpired. If possible, take a video recording, **but do not impede or obstruct law enforcement activities.**

(If you encounter an officer in a public area of campus)

“I’m a campus staff member. Per our internal protocols, I am required to notify Campus Safety when law enforcement is present, so I’ll do that now. For our internal log, may I ask which agency you’re with?” [Do not block or impede access.]

If an officer requests records or information about a student or employee:

“I understand you are requesting student information, which, consistent with the college’s legal confidentiality obligations under FERPA, I am not authorized to provide. Your request needs to be directed to the college’s legal counsel. I will contact Campus Safety and they will attempt to contact the General Counsel.”

(If they present a document)

“Thank you. I need to contact Campus Safety so this document can be reviewed by our campus legal counsel before proceeding. Please wait here while I contact them.”

(If the officer insists on immediate access or compliance)

“I understand this may be urgent, but I’m required to follow campus protocol and confirm with our legal counsel before granting access. Someone will be here shortly to assist you.”

(If the officer refuses to wait or leave)

Immediately contact Campus Safety and document the interaction. Include the date, time, agency name, officer names, badge numbers, any documents presented, and a summary of what was requested or said—and notify Campus Safety and/or General Counsel. If an officer states that exigent circumstances apply, frontline staff should not assess or dispute that claim, and should not attempt to block or slow down access.

If an officer appears for a SEVIS audit (site visit or record review):

“Thanks for reaching out. For SEVIS audits or site visits, we follow our standard procedures. We don’t discuss individual students without going through the proper process. SEVIS document requests need to be provided to our General Counsel for review, who will work with the Office of International Students & Scholars to respond. I can contact them right away.”
[Then contract General Counsel. If not available, contact Office of International Students & Scholars]

If an officer appears for an I-9 employment verification:

“Thanks for reaching out. For I-9 verification, we follow our standard procedures. An I-9 Notice of Inspection needs to be provided to our General Counsel for review. Human Resources handles I-9 verification. I can contact the appropriate official for you.” [Then contract General Counsel. If not available, contract Human Resources]