

## TITLE: IMMIGRATION ENFORCEMENT ACTIVITIES POLICY

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### POLICY:

Pursuant to guidance issued by the Maryland Office of the Attorney General, public institutions of higher education, including Cecil College (“the College”), constitute “sensitive locations” under the Maryland Values Act (the “Act”) (2025 Md. Laws, ch. 718). This Policy establishes procedures to ensure that College employees respond appropriately to immigration enforcement actions, that access to College property and records complies with State and federal law, and that the College fulfills its obligations under the Act.

The College is committed to providing a safe and inclusive educational environment for all members of the College community, regardless of immigration or citizenship status. This Policy applies to all College employees, contractors, and agents who may interact with immigration officials, law enforcement officers, or other federal authorities on College property or in connection with College operations.

### I. TERMS AND DEFINITIONS

1. College Premises: All buildings, grounds, facilities, and property owned, leased, operated, or controlled by the College, including satellite locations and off-site instructional facilities.
2. Immigration Enforcement Action: Any action by federal immigration authorities, including but not limited to U.S. Immigration and Customs Enforcement (ICE) or U.S. Customs and Border Protection (CBP), involving the questioning, detention, arrest, or removal of individuals based on immigration status.
3. Judicial Warrant: A warrant issued by a federal judge or U.S. magistrate judge, signed and bearing the name of the issuing court, authorizing a specific seizure under federal law. Judicial warrants are distinguishable from “administrative warrants,” which are not signed by a judge.
4. Administrative Warrant: A document, such as Form I-200 (“Warrant for Arrest of Alien”) or Form I-205 (“Warrant of Removal/Deportation”), issued by a federal immigration agency but

not by a court. Administrative warrants do not authorize entry into private spaces without consent.

5. Exigent Circumstances: An emergency situation in which law enforcement officers reasonably believe that immediate entry or action is necessary to prevent physical harm, the destruction of evidence, or the escape of a suspect.
6. Primary Point of Contact (“PPOC”): The College official designated under this Policy to serve as the liaison between the College and immigration or other law enforcement officers. The PPOC is responsible for verifying warrants, consulting with legal counsel, maintaining records, and coordinating employee responses under this Policy.
7. Immigration Officer: Any federal employee, agent, or contractor authorized to enforce federal immigration laws, including but not limited to officers of ICE or CBP.

## PROCEDURE:

### A. Nondiscriminatory Service & Private Spaces

1. The College provides educational services to members of the public, regardless of their immigration or citizenship status.
2. Cecil College considers private spaces to be classrooms, laboratories, all instructional areas, offices, office suites, counseling offices, prayer rooms, lactation rooms, administrative spaces, athletic facilities except during athletic events open to the public, training facilities, performance spaces except during performance events open to the public, and areas that are either locked or designated by signage as private spaces.
3. Cecil College considers public spaces to be building lounges, building hallways, building lobbies, bookstore; library (excluding employee offices), outdoor spaces to include campus grounds open to the public, sidewalks, parking lots, athletic facilities during athletic events open to the public; performance spaces during performance events open to the public, and public events.
4. Access to private spaces is limited to College employees, faculty, enrolled students, contractors, and others authorized by the College. Visitors not in these categories may enter only when escorted by authorized personnel or otherwise approved under College procedures.

### B. Immigration Enforcement at Cecil College

1. The College does not consent to the conduct of civil immigration enforcement operations on its premises.
2. No person seeking to enforce immigration laws may enter private spaces unless:
  - Exigent circumstances exist, or
  - The officer presents a valid judicial warrant issued by a federal court and signed by a United States District Judge or Magistrate.
3. The College designates the Director of Public Safety or designee as the primary point of contact (“PPOC”) for all matters involving immigration enforcement. The PPOC shall:
  - Be trained to recognize the differences between administrative and judicial warrants;
  - Train other staff on this policy and appropriate response procedures;
  - Consult with College legal counsel as needed.

4. If immigration officers appear at the College, employees shall presume that they are engaged in immigration enforcement action and proceed as follows:
  - Notify the PPOC immediately and ask the officers to wait in a public area;
  - If the officers demand immediate access to private spaces without waiting for the PPOC, employees shall state that the College does not consent to such access but shall not attempt to stop or impede the officers. As promptly as possible, employees shall contact the PPOC and document the incident, including:
    - A description of the verbal exchange with the officers;
    - Identifying details about them (e.g., names, badge numbers, agency);
    - Their actions and any arrests or other outcomes; and
    - The identity of any employee witnesses.
  - Under no circumstances should employees interfere with the officers, attempt to make them leave a public space, conceal any person from officers, or assist any person in evading officers.
5. The PPOC shall maintain records of all immigration enforcement action and any related correspondence.
6. The PPOC shall request and record the following information from any immigration officer who appears at the College on immigration business:
  - Name
  - Badge number or other official identifying information
  - Agency
  - Purpose of visit
  - Proposed action to be taken on College premises
7. If an immigration officer requests access to private spaces to conduct enforcement action, the PPOC may authorize such access only if the officer (1) asserts that exigent circumstances exist, or (2) possesses a valid judicial warrant. To confirm the existence of a valid judicial warrant, the PPOC shall:
  - Obtain a copy of the document;
  - Confirm that the heading shows the document was issued by a court;
  - Confirm that a U.S. District Court Judge or Magistrate signed it;
  - Confirm that it specifically identifies the College's premises among the places to be searched for a wanted person or evidence; and
  - Verify that the document is not expired.
8. The PPOC should consult with the College's legal counsel before authorizing access. If consultation is denied or not possible, the PPOC shall clearly state that the College does not consent to the officers' entry, but shall not obstruct or impede their access.
9. If immigration officers enter private spaces without a valid judicial warrant or exigent circumstances, the PPOC shall immediately notify legal counsel, state that the officers lack permission, but make no effort to resist or block the officers.

#### C. Requests by Immigration Officers for Records or Information

1. The confidentiality of information about students served by the College is generally protected by the Family Educational Rights and Privacy Act (FERPA) and Maryland law, including Gen. Prov. §§ 4-313 and 4-320.1 and COMAR 13A.08.02.18. The "personal information" protected by Gen. Prov. § 4-320.1 does not include information regarding citizenship or immigration status.

2. Unless State or federal law otherwise requires an immediate response, all requests from immigration officers for records or information must be referred to the PPOC, who will coordinate with legal counsel before responding.
3. The PPOC shall:
  - Obtain the officer's identifying information as required in Section C.6 of this Policy; and
  - Request a copy of any supporting documentation (e.g., subpoena, court order, or warrant).
4. If immigration officers present a judicial search warrant or assert that exigent circumstances exist to search a private area, the PPOC and employees shall follow Sections C.7 – C.9 of this Policy.

Employees must not disclose any records or information to immigration authorities unless directed by the PPOC or legal counsel.