



# Operating Standard

**Title:** Immigration Enforcement Activity & Law Enforcement Access Management

**Number:** A7400.60

**Type:** Administrative

**Responsible:** Administrative, Student Affairs

**Related Policies:** A7400

**Linked Operating Standards:**

**Related Laws:** FERPA, Immigrant TRUST Act, HB1312/SB2729

**Related External Standards:** None

**HLC Criterion:** 1A, 1B, 1C, 2A, 2B,

## 1.0 Statement

Shawnee Community College (SCC) is committed to providing a safe, inclusive, and welcoming educational environment for all students, employees, and visitors, regardless of immigration status. The College complies with all applicable federal and state laws while safeguarding the rights and privacy of individuals on its campuses.

## 2.0 Purpose & Scope

The purpose of this standard is to:

- Establish clear, uniform procedures for handling immigration enforcement and other law enforcement activity on or involving Shawnee Community College (SCC) campuses in order to comply with the Public Higher Education Act as amended by House Bill 1312 (P.A. 104-0440) and other applicable federal and state laws.
- This Operating Standard (OS) is intended to safeguard the rights, privacy, and safety of SCC students, employees, and visitors while providing clear direction to College personnel when interacting with immigration or other law enforcement agents.
- This OS applies to all SCC employees, including faculty, staff, administrators, student workers, volunteers, and contractors when acting on behalf of the College. It covers all SCC locations, facilities, sites of instruction, and any College-sponsored activity where College personnel may encounter or receive from immigration enforcement or other law enforcement agents.

## 3.0 Definitions

- **Immigration Enforcement Agent** - Any federal, state, or local officer or employee engaged in civil immigration enforcement, including but not limited to personnel from the U.S. Department of Homeland Security, Immigration and Customs Enforcement (ICE), or Customs and Border Protection (CBP).

- **Law Enforcement Agent** - Any sworn officer or agent of a federal, state, or local law enforcement agency, including campus or local police, whether or not engaged in civil immigration enforcement.
- **Public Area** - Any area of SCC property that is customarily open to the general public during normal operating hours, such as lobbies, publicly accessible hallways, reception areas, or open common spaces. Public areas do not include classrooms during instruction, private offices, secured workspaces, laboratories, or other restricted areas.
- **Nonpublic Area** - Any area of SCC property that is not customarily open to the general public, including classrooms, offices, non-public portions of student housing (if applicable), laboratories, and secured service areas.[4][2]
- **Judicial Warrant** - A warrant issued by a federal or state court judge or magistrate, bearing a case number, the issuing court, and a judicial signature, authorizing entry, search, or seizure.
- **Administrative Warrant** - A document issued by an agency, such as an ICE Form I-200 or I-205, that is not signed by a judicial officer and does not by itself authorize entry into nonpublic areas or disclosure of confidential information.

#### **4.0 Guiding Principles**

- SCC is committed to providing a safe and inclusive learning and working environment for all students, employees, and visitors, regardless of immigration or citizenship status. The College will comply with HB 1312, the Illinois TRUST Act, the Keep Illinois Families Together Act, FERPA, and other applicable laws limiting cooperation with civil immigration enforcement and protecting education records and personal information
- SCC personnel shall not disclose, or threaten to disclose, the actual or perceived citizenship or immigration status of any student, employee, or any person associated with a student or employee, except where disclosure is expressly required by federal or state law, court order, or lawfully issued subpoena.
- SCC shall not adopt or enforce any policy or practice that has the purpose or effect of discouraging participation in College programs or activities based on actual or perceived citizenship or immigration status, including by conditioning access on provision of Social Security numbers where not legally required.
- SCC will not honor, enforce, or provide voluntary assistance in response to civil immigration detainers, “hold” requests, or administrative warrants that are not accompanied by a valid judicial warrant or court order, except where expressly required by law.
- Requests from external parties for information relating to the citizenship or immigration status of students or employees must be referred to the Office of the President or designee (i.e., the Vice President for Student Affairs or Human Resources), which will consult legal counsel as appropriate.

#### **5.0 Roles & Responsibilities**

##### **A. Initial Contact and Routing**

- Any law enforcement or immigration enforcement agent who appears in person at an SCC facility or contacts SCC personnel seeking access to campus, to a specific individual, or to records must be directed to

Campus Administration or other designated Point of Contact (POC) identified in Section “Designated College Contacts.”

- Front-line staff (reception, switchboard, security, etc.) shall not independently authorize access to nonpublic areas or release records based solely on an agent’s request or display of credentials.

### **B. Verification of Identity and Legal Authority**

The designated POC (or designee) will:

- Verify the agent’s identity and agency affiliation by reviewing official credentials.
- Request and examine any warrant, subpoena, or other written authorization, distinguishing between judicial warrants and administrative warrants or detainers.
- Determine, in consultation with legal counsel when feasible, the scope of authority granted by the document (i.e., entry, search, seizure, records) and whether the College is legally required to comply.

### **C. Access to Nonpublic Areas**

- SCC will not consent to entry by immigration enforcement agents into nonpublic areas of campus unless presented with a valid judicial warrant that expressly authorizes such entry, or as otherwise required by law.
- If an agent seeks voluntary consent to enter a nonpublic area without a judicial warrant, SCC personnel shall politely decline and refer the agent to the designated POC, who will communicate the College’s policy and request that the agent remain in public areas.
- Campus Security or local law enforcement shall not grant access on behalf of SCC to immigration enforcement agents in a manner that conflicts with HB 1312, the TRUST Act, or this operating standard.

### **D. Procedures for Requests for Information or Records**

- Requests from immigration or other law enforcement agents for education records or other student or employee information will be reviewed under FERPA and applicable privacy laws.
- SCC will require a lawfully issued judicial subpoena, court order, or other legal process before disclosing personally identifiable education records or other protected information, unless a specific FERPA or statutory exception clearly applies.
- When permitted by law, and subject to any legal prohibitions on notice, SCC will make reasonable efforts to notify the affected student or employee, or their emergency contact, before producing records for immigration enforcement purposes.
- SCC will not create, collect, or maintain information about immigration or citizenship status unless required for a specific lawful purpose (i.e., federal financial aid or employment eligibility verification) and will store such information in accordance with College records-management and data-security requirements.

## **E. Notification to Affected Individuals and Campus**

- When SCC confirms that immigration enforcement activity is occurring on campus that is reasonably likely to impact or concern the College community, the designated POC will notify:
  - The President and appropriate Cabinet members.
  - Campus Security
  - Communications staff, to develop any necessary campus-wide advisories.
- Subject to safety and legal constraints, SCC will take reasonable steps to notify any student or employee who is the direct subject of an immigration enforcement request, including attempts to execute an immigration-related arrest, serve documents, or question them on campus.
- Campus-wide notices, when appropriate, will be factual and non-identifying, and may include links to Know-Your-Rights and legal resources.
- Notification may be delayed or withheld only where disclosure is prohibited by law, court order, or where immediate safety, security, or operational concerns require limited or delayed communication.
- Campus-wide communication related to immigration-enforcement activity shall follow the College's established emergency-communication and public-information protocols to ensure accuracy, consistency, and appropriate timing.

## **F. Documentation of Interactions with Law Enforcement**

- SCC shall document all material interactions with immigration enforcement agents and other law enforcement agents related to immigration-enforcement activity, including:
  - Date, time, and location of the interaction.
  - Name and agency of the agent(s).
  - The nature of the request (i.e., access, arrest, records).
  - Copies or descriptions of any warrants, subpoenas, or other documents presented.
  - Actions taken by SCC personnel, including any disclosures or denials.
- Documentation shall be maintained by the designated POC (or designee) in a secure repository consistent with SCC records-retention schedules and legal requirements.

## **G. Web-Posted Resources and Point of Contact**

- In accordance with HB 1312, SCC will maintain a dedicated webpage that:
  - Describes College policies and procedures related to immigration enforcement activity and law enforcement access.
  - Provides information on constitutional rights and immigration-related guidance for students, faculty, and staff (i.e., links to Illinois Attorney General "Know Your Rights" materials and reputable community resources).
  - Identifies a College point of contact whom students and employees may contact if a law enforcement or immigration-enforcement agent seeks to enter campus, access nonpublic areas, or engage in

non-consensual interactions with members of the College community.

- The webpage shall be reviewed at least annually, and after any material legal or policy change, to ensure that information and resource links remain current and accurate.

#### **H. Participation in Rights-Related Education**

- SCC shall not impede students, faculty, or staff from offering, attending, or participating in training or events focused on constitutional rights and immigration-related guidance, including Know-Your-Rights sessions, so long as such activities comply with other applicable College policies (i.e., facilities use, time-place-manner).
- College units may collaborate with community-based organizations and legal service providers to offer educational programming and resource distribution on immigration-related rights, subject to standard College vetting and contracting processes.

#### **I. Training and Communication**

- SCC will provide periodic training for designated POCs, front-line staff, campus safety personnel, and other relevant employees on:
  - This operating standard and related College procedures.
  - Distinguishing between judicial and administrative warrants.
  - Legal parameters for responding to immigration-enforcement and law-enforcement requests.
- SCC will disseminate information about this standard and the designated POC to employees and students via College handbooks, the website, and other communication channels.

#### **J. Designated College Contacts**

The President shall designate one or more College officials to serve as the primary points of contact for immigration-enforcement and law-enforcement access issues, such as:

- Vice President for Student Affairs (student-focused matters).
- Director of Human Resources (employee-focused matters).
- Campus Security (on-site coordination, if applicable).

Names, titles, office locations, telephone numbers, and email addresses for these designees will be published on the College's immigration-enforcement resources webpage and updated as needed.

### **6.0 Compliance, Review, and Revision**

- This Operating Standard is effective immediately upon approval and is intended to meet the January 1, 2026 procedural and web-posting requirements set forth in HB 1312 / P.A. 104-0440.
- The President or designee shall review this standard at least every five years, or more frequently as needed, to reflect changes in federal or state law, regulatory guidance, or best practices.

- Proposed revisions shall follow the College's established shared-governance and policy-approval processes for Management Operating Standards.

<b>Change Log</b>		<b>Governance Unit: Administrative Services Council</b>
<b>Date</b>	<b>Description of Change</b>	
12.17.25	Initial Development	
12.30.25	Legal Counsel Review	
01.21.26	Administrative Services Council, Facilities Team Review	