



California Health Sciences University

UNIVERSITY

CHSU RESPONSE TO IMMIGRATION ENFORCEMENT ACTIONS

PURPOSE

California Health Sciences University ("CHSU" or "University") is committed to complying with the requirements of local, state, and federal law, while protecting the privacy, safety, and civil rights of students, employees, and community members.¹ This Policy is intended to establish clear procedures for responding to immigration-related enforcement actions involving federal agencies such as Immigration and Customs Enforcement ("ICE"), Customs and Border Protection ("CBP"), Department of Homeland Security ("DHS"), or other law enforcement.

SCOPE

The Response to Immigration Enforcement Actions policy applies to all University students, employees, contractors, and authorized visitors, as well as any University departments involved in campus security, records management, student services, or human resources. It governs institutional procedures and employee responsibilities when responding to immigration enforcement actions.

POLICY STATEMENT

The University's policy is to safeguard the privacy, safety, and civil rights of all members of its community while adhering to relevant federal and state laws. The University will comply with the law, but will not participate in or facilitate immigration enforcement activities beyond what the law explicitly requires. Consistent with California state guidance, the University maintains

¹ California Attorney General guidance emphasizes that campuses should adopt structured response procedures to safeguard sensitive information and limit unnecessary cooperation with immigration enforcement.

Bonta, R. (2024, December). *Promoting a Safe and Secure Campus for All*. State of California Department of Justice Office of the Attorney General. <https://oag.ca.gov/sites/all/files/agweb/pdfs/immigration/higher-education-guidance.pdf>



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structured response procedures to safeguard sensitive information and limit unnecessary cooperation with immigration enforcement agencies.

All community members have rights under the U.S. and California constitutions, including the right to remain silent and the right to refuse consent to searches or entry into private or restricted areas unless legally compelled by a judicial warrant. The University prohibits discrimination based on immigration status and is dedicated to maintaining a campus that is accessible and supportive for all students and employees.

Together, these principles ensure that the University responds to immigration enforcement actions in a lawful, consistent, and protective manner of individual rights, aligned with California's expectations for higher education institutions.

DEFINITIONS

- A. **Covered Personnel:** All University employees, students, and third parties who are assigned specific responsibilities by the University that grant them access to Non-Public Areas of University Buildings or Premises, or access to personnel records or Academic Records other than their own, whether as a result of possession of physical keys or keycard access to locations containing physical copies of personnel or Academic Records, or online credentials allowing access to digital copies of personnel or Academic Records. This may include vendors providing security, housekeeping, or other building maintenance services.
- B. **Designated Campus Officials:** The University designates the Assistant Dean of Student Affairs for each college, Vice President for Human Resources, and the Director of Security as the points of contact related to any immigration actions or inquiries on campus.
- C. **Academic Records:** As defined in the [Policy on Academic Records and Transcripts](#).
- D. **Personal Information:** Any information that identifies or describes a student or employee, including, but not limited to, their immigration or citizenship status, physical description, home or work address, telephone number, education, financial matters, medical or employment history, and statements made by or attributed to them. This also includes



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information that may be designated as directory information under the Family Educational Rights and Privacy Act ("FERPA").

- E. **University Buildings or Premises:** Any building, property, or grounds owned, leased, and/or operated by CHSU, including the College of Osteopathic Medicine ("COM") campus and the building located at 120 North Clovis Avenue.
- F. **Public Areas:** Spaces open to the general public (e.g., campus lobby, sidewalks, parking lot).
- G. **Non-Public Areas:** Spaces in University Buildings or Premises that are not open to the general public and that are restricted to authorized university officials, employees, students, third parties, and invited guests. Law enforcement agents may not enter without permission or a judicial warrant. (This restriction does not apply to entry by emergency first responders (such as fire, medical, or law-enforcement personnel) acting to address an immediate threat to life, health, or safety. In such emergencies, first responders may enter Non-Public areas as permitted by law and in accordance with standard emergency-response protocols. Please see [Safety, Security, and Emergency Response Policy](#) for more information.)
- H. **Judicial Warrant:** Signed by a federal judge or magistrate.
- I. **Administrative Warrant:** Signed by ICE or DHS personnel; **not sufficient** to grant access to non-public areas.

POLICY

- A. **Access to University Buildings, Premises, and Information.** The University permits federal immigration officials to access only those University Buildings or Premises and information that the law requires or a judicial warrant authorizes. Immigration enforcement officers may freely enter Public Areas but may not access Non-Public Areas, including classrooms, offices, and other restricted-access areas, without a valid Judicial Warrant. Employees and students are not required or permitted to consent to entry into Non-Public Areas or to share the University's information with immigration officers unless they have been authorized to do so by Vice President of Legal Affairs.
- B. **Disclosure of Records and Information.** The University will respond to a judicial subpoena, court order, or other legally sufficient mandate. Otherwise, the University will not disclose



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student or employee records, including Academic Records or Personal Information, unless required by a judicial subpoena, court order, or other legally sufficient mandate directed to the University Designated Campus Officials for review. This is consistent with guidance from the State of California that requires institutions to safeguard student and family information and to ensure that immigration-related requests are handled lawfully and with appropriate oversight.

C. Referral of All Immigration-Related Requests and Interactions. All University employees must immediately refer any immigration-related inquiry, request, or campus visit, whether from ICE, CBP, DHS, or other law enforcement, to a Designated Campus Official(s). Employees must not assist federal immigration officers with locating individuals, providing information, or facilitating enforcement actions unless legally compelled or authorized to do so by a Designated Campus Official. These limits are consistent with guidelines stating that institutional personnel are not required to grant access, provide documents, or assist immigration enforcement in Non-Public Areas.²

D. Protection of Immigration and Citizenship Status Information. The University limits the collection, use, retention, and disclosure of immigration and citizenship status information.

1. The University does not create or maintain lists linking individuals to immigration or citizenship status.
2. Immigration or citizenship status information will not be used in admissions, enrollment, or hiring decisions, except where required by law.
3. The sole exception for employment is compliance with Form I-9 (and, if applicable, E-Verify) requirements, which occur only after a conditional offer of employment and strictly for employment eligibility verification.
4. Covered Personnel should assume they are not authorized to disclose immigration or citizenship status information unless expressly permitted by University policy or directed by an appropriate University official.

² National Immigration Law Center. (2025). *Protecting Immigrant Students & Employees: Guidelines for Higher Education Institutions*. National Immigration Law Center. <https://www.nilc.org/resources/protecting-immigrant-students-employees-guidelines-for-higher-education-institutions/>



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E. **Training and Review.** The University provides periodic training to ensure consistent implementation of this policy. The policy and related procedures will be reviewed regularly and updated as needed to reflect changes in law or guidance.

PROCEDURES

The University maintains separate procedures and guidance documents to support consistent implementation of this policy.

RESPONSIBILITIES

A. OHR and the Vice President for Human Resources, or their designee, are responsible for implementing the provisions of this policy.

HISTORY (R*)

Approval Date:

08/12/2026

Revision Date(s):

07/22/2026

Reviewed Date(s):

07/22/2026

RACI –

R: Office of the President

A: VP for HR, VP for Operations, Director of Security, and Assistant Dean(s) of Student Affairs

C: HR, President, College Deans, Director of Security, Legal

I: CHSU Employees and Students