

# Policy on Immigration Enforcement Actions on Campus

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## I. PURPOSE

In response to increasing attention to immigration and enforcement, Goucher College has developed clear guidelines for employees to follow in the event that officers or agents of government agencies, including but not limited to Immigration and Customs Enforcement (ICE) agents from the Department of Homeland Security (DHS), make inquiries about our students, employees, or contractors, appear on campus to make arrests or to interview students or other community members, request student education records or employee records, or for any other reason. The purpose of this policy is to clarify the College's obligations related to FERPA, DHS regulations, and other applicable laws, and to indicate the roles and steps to be taken in the event of immigration and/or law enforcement officials' presence on campus.

## II. SCOPE

This policy applies to all Goucher students, employees, and participants in on-campus Goucher-sponsored programming.

## III. POLICY STATEMENTS

Goucher will balance its commitment to support students, employees, and other community members while also meeting legal obligations related to federal immigration law and student and employee privacy.

Pursuant to the [Family Educational Rights and Privacy Act \(FERPA\)](#), the education records of all students, regardless of their immigration status, are protected from disclosure to outside parties except pursuant to a lawful subpoena or court order. This includes students' addresses, class schedules, information about their family members, information about immigration status, and similar information.

It is important to note, however, that Goucher must comply with requests for information regarding the international students attending Goucher through its F and J visa sponsorship programs. Information requests and site visits from any organization or agency relating to

students on visas will be handled by the Designated School Officials in the Office of Global Education.

Goucher is not required to collect or verify students' immigration status for them to be enrolled, and the College does not routinely gather such information.

Students who seek federal financial aid must provide documentation of immigration status to determine eligibility.

Students who pursue employment with the College must have authorization to work. They must complete and sign Section 1 of Form I-9, Employment Eligibility Verification, no later than their first day of employment and must present acceptable documents that show their identity and employment authorization within 3 business days of beginning employment. Goucher is an E-Verify employer.

Goucher sponsors international students in F and J immigration status. Federal agents may contact Goucher or be on campus for routine compliance matters related to required record-keeping and reporting.

The policy of the Office of Campus Safety is to not inquire about a person's immigration status. This includes crime victims, witnesses, or others who call or approach an officer seeking assistance. If undocumented individuals believe that reporting a crime, providing information to the police, seeking help from the police, or contacting the Title IX, Student Affairs, or other campus offices could negatively impact them because of their immigration status, they are less likely to do so. That is not in the best interest of their safety or campus safety generally.

**Public Areas.** Goucher has some spaces that are open to the public, and the College does not restrict federal or other enforcement officials from those spaces.

**Private areas.** Residential spaces such as on-campus residential rooms are considered private, and government enforcement officials are not permitted in such spaces unless they have a valid judicial warrant or consent from the resident. **An administrative warrant alone does not permit government officials to enter a private residence.**

**Limited access areas.** Most buildings on campus are not open to the public. Although doors in a building may be open during business hours for the convenience of those eligible to enter, those limited access buildings are not open to the public. Individuals not affiliated with Goucher or present for an educational purpose or a Goucher event are not authorized to be there. It is Goucher's policy and practice that those individuals are directed by Campus Safety to leave the building. These buildings include but are not limited to the Athenaeum, the Decker Sports and Recreation Center, and all academic buildings. No ICE or other government agent may enter those buildings without a judicial warrant specifying their authority to do so.

## IV. PROCEDURES

If a federal immigration or local law enforcement official contacts a Goucher employee in person or otherwise requesting information about a student, employee, other community member, or presenting a warrant or order for the detention, arrest, or deportation of a student, employee or other community member, the employee should follow the steps set forth in the **Procedures for Responding to Immigration Enforcement Actions on Campus**.

## V. DEFINITIONS

**DACA:** Deferred Action for Childhood Arrivals (DACA) is an executive action issued by President Barack Obama in 2012 that provides temporary relief from deportation and employment authorization to certain qualifying undocumented individuals who came to the United States prior to turning 16 and before June 15, 2007.

**DHS:** Department of Homeland Security, the agency that oversees, among others, Customs and Border Protection (CBP), Immigration and Customs Enforcement (ICE), and U.S. Citizenship and Immigration Services (USCIS).

**F-1 Student:** International student temporarily in the United States to pursue academic studies and/or language training programs.

**ICE:** Immigration and Customs Enforcement, the division within DHS responsible for enforcing federal laws governing border control, customs, trade, and immigration.

**ICE Detainer:** This is a request from ICE to a state or local law enforcement agency to hold an individual for an additional 48 hours after the individual's release date so that ICE can arrange to take custody of the individual. State and local law enforcement agencies are not obligated to enforce ICE detainers, and many agencies have chosen not to do so.

**J-1 Student:** An exchange visitor temporarily in the United States to pursue a specific educational exchange programs or degree program.

**Undocumented Student:** Student who is currently in the U.S. without legal immigration status.

## VI. RESPONSIBLE OFFICE

For more information about F, J, and other nonimmigrant visa holders, please contact the Office of Global Education: [globaleducation@goucher.edu](mailto:globaleducation@goucher.edu)

For any other questions, please contact the Office of Risk Management: [riskmanagement@goucher.edu](mailto:riskmanagement@goucher.edu)

## VII. HISTORY

Created March 2017

Updated October 2019

Updated March 2025