NOTE: This template is provided to help users develop a plan for their school(s). It is not ready to implement. The template should be modified by the local educational agency (LEA) and/or school based on an assessment of each school's needs and resources.

- The steps outlined in this template are suggestions.
- Use of this template is not required.
- Notes to the plan developers are included in blue. Delete these notes from your finished plans.

Immigration Enforcement On or Near School Grounds

Scenario: Immigration enforcement officers are operating on school grounds or in areas near enough to the school to impact school routines and attendance.

Background:

a) The Department of Homeland Security has rescinded its sensitive locations policy that restricted enforcement by Immigrations and Customs Enforcement (ICE) at or near K-12 campuses. Immigration enforcement officers must still have proper authority to enter the non-public areas of a school campus, but they can access public areas on and near a K-12 campus without the consent of school officials.
   - Public areas are places on a school campus where the public can enter without authorization. School parking lots and areas that are not fenced or that allow unmonitored access are generally considered public areas.
   - Non-public areas of the school are those that cannot be entered without the express authorization of school officials. These areas generally include the interior of school buildings, fenced areas of the school campus, and areas with posted signage indicating that permission is required to enter.

b) Senate Bill 98 amends several provisions within the California Education Code, including section 32282(a)(2)(N) which adds the requirement that all public schools, including charter schools, incorporate procedures into their Comprehensive School Safety Plans (CSSP) for notifying "parents and guardians of pupils, teachers, administrators, and school personnel when the school confirms the presence of immigration enforcement on the school site." The bill requires:

   a. The content and timing of the notification should consider the safety and well-being of the students, employees, and community members of the school site in the issuing of such notifications.
   b. Notifications must include the date and time the immigration enforcement was confirmed, and the location.
   c. The school should include the required notification procedures in the CSSP no later than March 1, 2026.

Related Annexes: Person Detained by Immigration Authorities
Child Left at School
Student Demonstration

BP/AR Reference (add a reference if applicable):

BEFORE	
Goals:	1. Implement physical controls and/or signage to limit access to non-public areas of the school 2. Prepare to support student needs in response to immigration enforcement activities at or near the school 3. Develop procedures for notifying parents and guardians of pupils, teachers, administrators, and school personnel when the school confirms the presence of immigration enforcement on or near the school site 4. Prepare staff to respond appropriately to reports of immigration enforcement officers on or near school
Objective(s):	**Goal 1 Objectives: Safeguard access to non-public areas of the school** a) Identify all public and non-public areas of the campus b) Assess visitor check-in policies and procedures to determine if they ensure that all visitors will be restricted to the public areas of the school c) Assess the need for physical controls (monitored access points and signage) at the entrances to the non-public areas of the campus to ensure that non-public spaces are clearly designated with signage that restricts entry to students and staff and requires all visitors to register at the school office d) Collaborate with extended day programs to ensure the limiting of access to non-public areas of campus before and after school hours e) Review the programs and activities that utilize the school facility to delineate those that are open to the public and those which should be classified as non-public **Goal 2 Objectives: Prepare to support student needs** a) Students Remaining at School: Have a plan for students who are unable or afraid to leave school at dismissal b) Mental Health: Prepare to implement the Mental Health Crisis Intervention annex c) Reunification: Prepare options for reunification of children in emergency childcare with their parents d) Education: Prepare to provide distance learning options and tutoring support for children whose attendance is disrupted by immigration enforcement e) Before-/After-School Care: Prepare for an increased demand for before/after school care f) Access to Meals: Develop strategies to improve access or provide a replacement for school provided meals, for students whose families are impacted by immigration enforcement **Goal 3 Objective: Prepare immigration enforcement notification procedures** a) Define the parameters that will be used to determine if notification is required b) Create scenario-based criteria to determine the means and timing of notifications c) Prepare translated call scripts and letter templates for likely scenarios **Goal 4 Objectives: Prepare staff to respond appropriately** a) Educate all employees on the distinction between public and private spaces, and alert them to the possibility that immigration officers can choose to operate in the public spaces on and near campus b) Advise employees that they are prohibited from granting access to the non-public areas of the campus and required to refer to the school office anyone seeking access to the non-public areas of the campus c) Train employees on the school's plan for responding to immigration enforcement activities: 1. In a non-public area of the school property

	2. In a public area of the school's property 3. Near the school 4. During an extended school day program extracurricular activity
Courses of Action:	**LEA ACTIONS** **<u>Goal 1 Actions: Safeguard Access to Non-Public Areas</u>** SCHOOL PRINCIPAL a) Use copies of the school map to label the areas of the campus that are open to the public (public) and not open to the public (non-public) during the following: 1. Before-school programs or activities 2. School hours 3. After-school programs or activities b) Review and revise the school's written policies and procedures on visitors to ensure that all outsiders, including immigration enforcement officers, will not be allowed unauthorized access to the non-public areas of the school during: 1. Before-school programs or activities 2. School hours 3. After-school programs or activities SAFETY TEAM SITE WALK (Suggested members include a school administrator, school resource officer, campus supervisor, site custodian, the school's receptionist, expanded learning program staff, and a LEA maintenance and operations director/manager.) a) To prepare for the site walk, review: 1. The school maps that were created by the principal to label the public and non-public areas of the campus during before-school programs and activities, during school hours, and during after-school programs and activities 2. Review the school's written policies and procedures on visitor access during a. Before-school programs or activities b. School hours c. After-school programs or activities b) Conduct a walk-through review of all non-public areas of the school to ensure that there are sufficient controls in place to prevent visitors or intruders from accessing the non-public areas of the campus. Be sure to include all: 1. Entrances and gates on the perimeter of the campus 2. Access points on the interior of the campus (like the lobby of the school office) that lead to non-public areas of the campus Address the following key questions during the review: 1. Could an individual gain unchallenged access to the non-public areas of the campus through this point of access during: a. Before-school programs or activities? b. School hours? c. After-school programs or activities? 2. Is there signage present that clearly: a. Restricts access to the non-public areas of the campus to students and authorized personnel? b. Requires visitors to register at the school office? 3. Does the signage address the entry procedures for before- and after-school programs and activities?

c) Identify and implement solutions needed to correct all noted deficiencies.

Goal 2 Actions: Prepare to support student needs

LEA LEADERS

Create a plan to support schools with the needs outlined below. Consider creating an Immigration Enforcement Response Team that can be deployed to sites during a crisis. Include school social workers, counselors, and interpreters on the team. If the LEA lacks the resources, consider how telephonic resources could be used to assist site personnel.

SITE SAFETY TEAM

a) Temporary Childcare: Describe a plan to provide supervision for students who are unable or afraid to leave campus. Consider the following scenarios:
    1. Multiple students (more than could be accommodated in the office) are expressing fear about leaving the campus due to immigration enforcement concerns
    2. Officers carrying rifles are active on the street adjacent to the school just before dismissal making it necessary to place the school in "secure campus" until the area is safe for students
    3. Immigration enforcement officers in tactical gear and carrying rifles are active on a route home used by students who walk
    4. Following reports of immigration activity near the school, several students are still at school more than an hour after dismissal (Refer to your "Child Left at School" procedures.)

    Be prepared for the possibility that staff may need to be called on to provide after-hours supervision
b) Mental Health: Describe a plan to support the mental health needs of students who are unable or afraid to leave campus, and how they will receive follow-up support.
c) Reunification: Describe a plan for how the LEA and site will facilitate reunification of students with their parents. Address:
    1. How the site will communicate with the parents of children in temporary care.
    2. Alternatives for reunification:
        i. To allow for students to be picked up at school, provide supervision until enforcement operations have been completed
        ii. Transporting students to another school site that is not currently impacted by immigration enforcement
        iii. Providing transportation to take students home
d) Education: Describe a menu of alternatives for parents and students who are too afraid to come to school.
    1. Short-term independent study contracts
    2. Virtual tutoring support
    3. Longer term distance learning options
e) Before-/After-School Care: Determine if the capacity of before- and after-school programs could be expanded to accommodate students whose parents are concerned about exposure to immigration enforcement during standard drop-off and pick-up times.
f) Access to Meals: Describe the strategies the school will use to improve access or provide a replacement for school provided meals, for students whose families are impacted by immigration enforcement.

Goal 3 Actions: Prepare immigration enforcement notification procedures

LEA ACTIONS

SB 98 requires that the school notify parents, staff, and students when it confirms the presence of immigration enforcement on the school site. “School site” in this context means an individual school or campus of a school district, county office of education, or charter school; an area where an LEA’s school-sponsored activity is currently being held; or a school bus or other form of transportation provided by the LEA.

When a notification is issued in response to immigration enforcement on the school site, the notice must include the date and time the immigration enforcement was confirmed and the location of the enforcement activity. The notice may also include a hyperlink to additional resources, including model policies related to immigration enforcement adopted by the LEA.

The bill does not specify that notification of enforcement activity be provided in real-time. School leaders are required to consider the safety and well-being of the students, employees, and community members of the school site when determining the content and timing of such notifications.

When immigration enforcement activities could result in a direct threat to safety, or are likely to disrupt school operations, real-time notification may be warranted.

All [Name of LEA] will use the following criteria to determine the type of notification that will be made.

Is providing real-time notification necessary to: (Consider the following criteria.)	**Provide real-time notification if either answer is “yes.”**	**Provide follow-up notification if both answers are “no.”**
1. Protect students from harm?	☐ Yes	☐ No
2. Inform parents about conditions that could impede students’ arrival or departure from school?	☐ Yes	☐ No

When issuing notifications all [Name of LEA] will use the following procedures to notify parents, students and staff.

Describe the procedures for issuing real-time notifications.

Describe the procedures for issuing follow-up notifications.

For more information see the SB-98 Immigration Enforcement Notices document in the resource section of this annex.

Goal 4 Actions: Prepare staff to respond

PRINCIPAL ACTIONS

1. Train all employees on the school’s plan for responding to immigration enforcement activities:
    - In a non-public area of the school property
    - In a public area of the school’s property
    - Near the school

	• During an extended school day program / extracurricular activity
DURING	
Goals:	1. Protect students from harm 2. Protect students' and families' rights to privacy 3. Provide required notification of enforcement to parents, students and employees
Objective(s):	**Goal 1 Objectives: Protect students from harm** 1. Determine if the enforcement activity could pose a threat to the safety and well-being of students 2. Take action to minimize the potential harm **Goal 2 Objectives: Protect privacy rights** 1. Evaluate and respond to law enforcement requests for access to students or student information in accordance with LEA procedures **Goal 3 Objectives: Provide required notifications** 1. Provide notification of immigration enforcement on school grounds in accordance with LEA procedures 2. Provide notification of immigration enforcement near school grounds in accordance with LEA procedures
Courses of Action:	ALL STAFF ACTIONS: 1. Report the presence of immigration officers on or near the campus to the school principal 2. Direct immigration officers who request access to the non-public areas of the campus to the school office PRINCIPAL/INCIDENT COMMANDER ACTIONS: Response to immigration enforcement officer requests for access Insert the LEA's procedures for responding to requests for access to people, non-public areas, or student records. Response to immigration enforcement on or near school grounds 1. Notify [the superintendent or designee] of the presence of immigration enforcement agents. Provide the location, approximate number of agents and a brief description of what they're doing. 2. Determine if the enforcement activity has the potential to harm students. a. Does the enforcement activity have the potential of becoming violent? b. How likely are students to be in the area where the enforcement activity is occurring? 3. Take action to protect students from harm. Consider: a. Issuing an order to "secure campus" b. Requiring that students be checked out of school individually by their parent/guardian or authorized emergency contact c. Busing students to an alternate location for reunification with parents 4. Assign staff to monitor the enforcement activity from a safe distance. 5. Determine if providing real-time notification to parents on the enforcement activity is required using the LEAs criteria. 6. If the enforcement activity will impact students' ability to be picked up/walk home safely, activate the temporary childcare plan. 7. Activate additional incident command roles as necessary. 8. Update [the superintendent or designee] on the

	a. Actions that you are taking to protect students b. Status of the enforcement activity c. The status of the site's emergency response
AFTER	
Goals:	1. Provide follow-up notification to parents, staff and students 2. Provide follow-up support for students impacted by the incident 3. Follow-up with families who were impacted by the incident to address needs and concerns 4. Monitor daily attendance to identify students who may be afraid to attend or have difficulty getting to and from school 5. Evaluate the emergency response
Objective(s):	**Goal 1 Objectives: Provide follow-up notification** **Goal 2 Objectives: Provide follow-up support for students** 1. Assign mental health team members to follow-up with students showing signs of distress following the incident. Activate mental health crisis intervention team if necessary. **Goal 3 Objectives: Follow-up with families** 1. Identify families who have needs or concerns following the incident 2. Assign staff to follow-up and provide resources and referrals **Goal 4 Objectives: Monitor daily attendance** 1. Have teachers monitor their students to identify changes in their normal pattern of attendance and refer students to the student assistance team/mental health team for follow-up 2. Assign staff to contact parents to identify needs **Goal 5 Objectives: Evaluate the response**
Courses of Action:	PRINCIPAL/INCIDENT COMMANDER ACTIONS 1. Provide written follow-up notification to parents, students and staff following the immigration enforcement incident a. If real-time notification was used, use the follow-up notification to recap the information that was provided, to summarize the school's response and to provide information to parents on how they can access support 2. Activate the mental health crisis intervention team, if necessary 3. Have teachers monitor their students to identify changes in their normal pattern of attendance and refer students to the student assistance team/mental health team for follow-up 4. Interview staff members who played a prominent role in the incident to get their feedback on the emergency response a. What worked well? b. What needs to be improved? c. Do you have any suggestions? 5. Incorporate this feedback and your reflections into an after-action report to review with the site safety team 6. Review and revise this annex based on your evaluation MENTAL HEALTH TEAM LEADER 1. Make support available to students who want it, and to those who are having difficulty coping

	2. Assign staff to follow-up with students who had difficulty coping during the incident 3. Assign staff to follow-up with students, and the family of any student known to be directly impacted 4. Explore options with families who are afraid of having their children come to school to create workable solutions

RESOURCES AND REFERENCES

1. Add the LEA document that lists procedures for responding to requests from immigration officers. If the LEA does not have written procedures the following documents may be helpful:
    a. Immigration Officer Incident Report (PDF)
    b. Warrants and Subpoenas that May Be Used by Immigration Enforcement Officers (PDF)
2. SB-98 Immigration Enforcement Notices