



Connecticut Association of Boards of Education

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PRESENTS POLICY HIGHLIGHTS

April 7, 2025

Amending School Security and Safety Policies to Include New Act DEI Compliance

On March 3rd, Governor Lamont signed into law **An Act Concerning Interactions Between School Personnel and Immigration Authorities, the Purchase and Operation of Certain Drones, Grants to Certain Nonprofit Organizations, and Student Athlete Compensation through Endorsement Contracts and Revenue Sharing Agreements.**

As this Act relates to board policy, it imposes statutory obligations regarding policy and procedures for interactions between school personnel and immigration authorities, requiring public school superintendents to *designate at least one administrator at each school to be responsible for interacting with federal immigration authorities* and boards of education to *update their school security plans with procedures on interacting with immigration authorities*. It also provides school staff with *protection against discipline for following the law's provisions*.

All local and regional boards of education are required to update their **school security and safety plans** for each school to include protocols for interacting with immigration authorities that align with guidance from the State Department of Education (SDE). The bill specifically refers to the [guidance SDE issued on January 28, 2025](#), which, among other things, recommends that each school district designate at least one administrator to be responsible for interacting with immigration authorities.

The designated administrator is required to implement the updated security and safety plan protocols when interacting with immigration authorities. These “officers” are defined as employees of United States Immigration and Customs Enforcement or the Department of Homeland Security, or people paid by or acting as their agents, who are charged with civil enforcement of the Immigration and Naturalization Act.

As it prohibits a school board from disciplining, suspending, terminating, or otherwise punishing an employee or an administrator for implementing the updated school security and safety plan relating to staff interacting with immigration authorities, it applies explicitly to staff taking any of the permitted actions and directing the immigration authority to communicate with the designated administrator.

Updating School Security and Safety Plans

The Act requires boards of education to update their school security and safety plans for the current school year to include protocols for interacting with federal immigration authorities. Specifically, school boards are required to do the following in the plans:

- Designate at least one administrator at each school to serve as the individual responsible for interacting with federal immigration authorities;
- Specify that this administrator, or any school employee, may request specific information from the immigration authorities or take other actions; and
- Permit other school personnel to direct immigration authorities to the designated administrator if they request access to records, information, or the school building interior or to communicate with other school personnel.

The following are actions that the designated administrator or any other school employee may take:

- Request and record a federal immigration authority's identification, including the name, badge or identification number, telephone number, and business card;
- Ask the immigration authority if he or she has a judicial warrant to support the authority's request and, if so, to show the warrant;
- Review warrants or other materials that the authority provides to determine who issued the warrant and what it or the other material authorizes the authority to do; and
- Consult with the school district's legal counsel on how to interact with the immigration authority regarding the request's nature, whether a warrant is produced, the warrant's details (including whether it is a judicial warrant or an administrative warrant), whether the immigration authority is claiming exigent circumstances, and any other consideration the legal counsel has identified.

The School Security and Safety Committee

Under current law, the school security and safety committee at each school must include one administrator. Now, it is required that the administrator designated to interact with immigration authorities serve on the committee. By law, the other members of the committee include a local police officer, a local first responder, a teacher employed at the school, a mental health professional, a parent or guardian of a student enrolled in the school, and any other person the school board deems necessary.

More About DEI Compliance

In a letter to superintendents dated April 4, the State Education Commissioner reported that the Connecticut State Department of Education (CSDE) had received a letter on the 3rd from the United States Department of Education, which issued a request that State Education Agencies (SEAs) certify their compliance with Title VI. The letter also noted that as Connecticut's SEA, the Department is also responsible for collecting certification responses from its school districts.

Commissioner Russell-Tucker reported that CSDE is carefully reviewing the requested certification and will provide superintendents with further information and instructions early this week.

This communication resulted from a memo sent to state education leaders by the US Department of Education, once again threatening federal funding to states that do not comply with Trump administration mandates to eliminate DEI initiatives from all 13,000 of our nation's schools. While there's been a lack of clarity as to what exactly would trigger a DEI violation in Secretary Linda McMahon's view, Craig Trainor, acting assistant secretary for civil rights at the Education Department, wrote in the aforementioned letter, "Federal financial assistance is a privilege, not a right adding the following: "Unfortunately, we have seen too many schools flout or outright violate these obligations, including by using DEI programs to discriminate against one group of Americans to favor another based on identity characteristics."

The document sent to states cites Title VI of the Civil Rights Act, which seeks to prevent discrimination and broadens the Department's interpretation of the Supreme Court's 2023 decision overturning affirmative action in college admissions to apply to K-12.

While the administration has not offered many examples of K-12 programs it considers illegal, New York Times reporter Dana Goldstein identified types of initiatives that could come under scrutiny. They include the following:

- *Single-Race Affinity Groups* that separate students by race, either to provide targeted support or in an attempt to foster more open discussions about race itself;
- *Black Studies and Ethnic Studies Courses* that emphasize and focus on racial stereotypes;
- *Programs to Boost Outcomes for Specific Groups*, including initiatives that aim to recruit a more diverse set of teachers to better match student demographics and increase enrollment of non-white students in Advanced Placement courses or gifted programs;
- *Heritage Celebration and Book Lists* with tailored reading lists or performances formed to explore specific identity. (*How the Trump Administration Might Target D.E.I. in Public Schools*, April 3, 2025)

While neighboring New York State's Education Department declined to provide further certification, stating that the state's school system "has and will comply" with federal anti-discriminatory laws, Connecticut officials indicate they are taking a more deliberative approach.

According to a report in the CT Mirror, this approach is frustrating state advocates, such as attorney Andrew Feinstein, who works with Special Education Equity for Kids. He wrote a letter to state officials calling for the department to issue a statement challenging the legality of the orders: "The statement should say that the Department of Education and the Attorney General will litigate the issue on behalf of any district that faces any funding cutoff due to this alleged policy," adding, "The time for partial compliance and lying low is over. Connecticut needs to take a strong stand now." (*Advocates Question CT Education Leaders' Approach after Trump Threat to Funding*, April 4, 2025)