



**To:** CSCU Presidents, Campus Security Personnel

**From:** Terrence Cheng, CSCU Chancellor

**CC:** Karen K. Buffkin, CSCU General Counsel

**Date:** January 27, 2025

**RE:** Protocol with respect to U.S. Immigration and Customs Enforcement on CSCU  
Campuses

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### ***OUR POSITION***

The Connecticut State Colleges and Universities (CSCU) is strong because of its diversity. Our campuses thrive when people from different races, ages, religions, ethnicities, sexual orientations, gender expressions, nationalities, physical abilities and political perspectives have a forum for sharing their beliefs and ideas while learning together. This is a critical value of higher education. CSCU is committed to social justice, to celebrating our diversity, and fostering a climate of inclusion and respect for one another. CSCU will continue to comply with federal and state law, and we will remain focused on what is truly best for our students and institutions.

### ***PURPOSE***

The purpose of this protocol is to provide guidance to the Connecticut State Community College, Charter Oak and our 4 universities so that any students, staff or faculty impacted by the Presidential Executive Orders, including "Securing Our Borders," will be treated with the utmost respect, dignity and care within the confines of CSCU obligations. It is the intention of CSCU to comply with legally mandated orders, warrants and judicial subpoenas, but beyond those legal mandates, it shall not further engage in the enforcement of federal immigration laws.

### ***BACKGROUND***

CSCU has deliberately refrained from using the term "sanctuary" as sanctuary is a concept that has a broad range of meanings. CSCU does not have the power or ability to declare any "sanctuary" that is exempt from federal or state law. It is not our intention to provide

anyone with a false sense of security. Additionally, the Department of Homeland Security has rescinded the directive that exempted Connecticut State Community College, Charter Oak State College and our University campuses, from being the focus of enforcement actions as “sensitive locations”. Colleges and universities can no longer expect that immigration and enforcement actions will not occur on our campuses. ICE cannot enter non-public areas<sup>1</sup> of the campus without being granted permission or without a valid warrant issued or signed by a judicial officer, unless exigent circumstances exist.

### ***FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT***

Under the Family Educational Rights and Privacy Act (FERPA) all students are entitled to privacy regardless of immigration status. Education records, which are broadly defined as records related to a student and maintained by the institution, cannot generally be disclosed without a judicial warrant, subpoena, court order or student consent. CSCU institutions shall continue to uphold FERPA and deny requests for student information that are not accompanied with a judicial warrant, court ordered subpoena, or student consent.

If the institution has international students on VISA, note that compliance with the Student Exchange Visitor Information Service (SEVIS) is still required. <https://www.ice.gov/sevis>

### ***PROTOCOL***

1. If an ICE agent approaches a CSCU campus institution seeking student information or access to a student, faculty or staff, **that agent should be referred directly and only to the President of the institution (or their designee.)**
2. The President should request from the agent (a) the reason for the visit; (b) the agent’s name(s) badge or ID number(s), telephone number(s) and business card; (c) evidence of authorization, i.e. judicial subpoena; and (d) whether alternatives to action on campus have been considered.
3. Upon acquiring the information, the President should immediately contact CSCU General Counsel.
4. No action, i.e. providing any information or providing access to the person in question, should be taken prior to consultation with CSCU General Counsel.

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<sup>1</sup> Non-public areas are those that are not accessible to the general public and require a key or swipe card access or where entry is granted, such as offices, dormitories, classrooms and dining halls.

5. If the ICE agent presents a warrant, the warrant must be provided to CSCU General Counsel for verification of the scope of the warrant.
6. In any instance where ICE is physically present on campus or requests information, it should be reported to the campus President and CSCU General Counsel.
7. If CSCU General Counsel verifies the warrant, the President of the institution should be the only person responsible for providing information to the ICE agents.
8. If the President of the institution intends to provide information to the ICE agents, the President must make reasonable effort to notify the subject student of the court order or subpoena before disclosing the records (unless ICE or other federal officials are investigating an act of terrorism). The President or designee shall keep detailed records of the disclosure as required by FERPA.

#### ***FOR CAMPUS SECURITY PERSONNEL***

1. CSCU Police officers (Special Police Forces) and security personnel will not inquire about a person's immigration status, nor shall they inquire about the immigration status of crime victims, witnesses or others who approach the police officers and security personnel seeking assistance.
2. No person will be detained by police officers or security personnel solely on the basis of immigration status or on the belief that the person is in the United States illegally.
3. Information regarding a person's immigration status contained within the records of CSCU Police Officers (Special Police Forces) or security personnel will be disclosed only as compelled by law.
4. CSCU Police Officers and security personnel will follow the provisions of Section 54-192h of the Connecticut General Statutes and associated guidance. Accordingly, CSCU Police will not make arrests nor detain an individual based upon administrative warrants issued by ICE or other federal agencies including administrative immigration warrants except as provided by the CT Trust Act.