

Compliance with Civil Authorities

All should be prepared for a new federal government immigration environment, including possible encounters with the United States Immigration and Customs Enforcement (ICE) responsible for enforcing federal immigration laws and directives

Here are the steps you must take if any representative of the federal government arrives at your school:

1. Ask the representative for identification, the purpose of their visit and a copy of their business card.
2. Be polite with the representative. Inform her/him that you intend to cooperate with them but to do so you must contact the Archdiocese Office of Legal Services for further direction.
3. Please notify the Archdiocese Office of Legal Services **Senior Immigration Counsel, Olga Rojas at (312)534-8332 or by email at orojas@archchicago.org** for immigration matters, **or Senior Counsel, John di John, at (312) 534-5370 or by email at jdjohn@archchicago.org** regarding employment or school matters (e.g. I-9 Audit and Requests to Enter). Forward to them documentation provided by the federal representative.
4. The Office of Legal Services will provide you with direction on steps to be taken.
5. Address any questions about the above directions to Olga Rojas or John di John.
6. After notifying the Office of Legal Services, also notify your Director of Vicariate Operations and/or Director of School Operations that you were contacted of ICE, providing the date of the contact and a short description of the nature of the contact.

Following the above steps will ensure your parish/school is cooperating with federal authorities as required by law. Failure to cooperate with a federal representative may have serious consequences for your parish/school and the Archdiocese. It is important to know the many situations under which a representative of the U.S. Department of Homeland Security (DHS) which includes ICE may appear at your school.

- **Student and Exchange Visitor Program (SEVIS).** The Archdiocese of Chicago Catholic Schools have foreign students enrolled as F-1 students through the SEVIS program. ICE may visit your school unannounced or may schedule review of information related to only those students enrolled via the SEVIS program or to verify changes to the school itself such as an address change or merger. Further, in connection with the SEVIS program, Homeland Security Investigations (HSI) can visit the homes/dormitories where children reside. These visits are routine and conducted to ensure SEVIS program compliance. A warrant is not needed for these visits.
- **Religious Worker/H1-B.** If your parish or school employs a person who requires a Religious Worker or H-1B visa, representatives from the U.S. Department of Homeland Security ("DHS") may conduct a site visit related to this Immigration sponsorship. Most site visits are unannounced. These visits are routine and conducted to ensure the person's employment is

consistent with representations set forth in the sponsorship application. A warrant is not needed for these visits. Contact Olga Rojas as soon as the Officer arrives.

- **I-9 Audits.** Representatives of ICE, the U.S. Department of Labor (DOL), the U.S. Department of Justice (DOJ) Office for Immigrant Employee Rights (IER) can come onto to the premises with just a Notice of Inspection to inspect your I-9 records for compliance with federal employment law. No warrant is needed. Contact Office of Legal Service immediately.
- **Warrant, Court Order or Request to Enter for Other Reasons.** Representatives of ICE or other federal agencies may arrive at your parish/school to enforce immigration laws. These visits will be unannounced and may be pursuant to a warrant or court order. If the official presents a valid warrant or court order, they must be permitted access to the property. If the official does not present a warrant or court order, but merely requests to enter for a reason unrelated to any of the matters described in the above bullets the law does not grant them access to your property. Our response to requests to enter should be the same as when such requests are made by local law enforcement or DCFS and any information release must be in accordance with the Family Education Right to Privacy Act (FERPA). Contact Office of Legal Services immediately.

To prepare for any possible interaction with civil authorities you should ensure your student and employee records are in order. To that end, consider taking the following steps:

- **I-9 Forms Segregation.** In anticipation of a possible I-9 audit, you should make sure I-9 forms are separated from your employee personnel files and that they are complete and in order. Contact your HR Representative if you have questions or need assistance.
- **Student Data Review.** Ensure you have emergency contacts for all students in the event the parent(s)/guardian(s) is not available in an emergency situation. For students on F-1 Student Visas, any changes to the home address or the guardian must be immediately reported to Miriam Shabo via email at mshabo@archchicago.org as she is required to notify SEVIS within 10 days.