

PRINCE GEORGE'S COUNTY PUBLIC SCHOOLS
Board of Education Upper Marlboro, Maryland

0130
Policy No.

BOARD OF EDUCATION POLICY

BASIC COMMITMENTS

Interacting with Immigration Enforcement Agents

I. POLICY STATEMENT

- A. The Prince George's County Board of Education (Board) strives to provide educational services to students and their parents, as well as community members, regardless of their immigration or citizenship status, so that students and staff members throughout Prince George's County Public Schools (PGCPS) may work, learn, and interact in schools and worksites that affirm diverse backgrounds.
- B. The Board wholeheartedly champions its commitment to creating a safe, affirming, and welcoming environment for all PGCPS students, staff, and families, and providing a safe and non-disruptive learning environment for all students, teachers, and staff.
- C. The Board is unwavering in its commitment to creating a safe, inclusive, and supportive environment where all students, staff, and families can process, grieve, share, reflect, learn, and take meaningful action together. PGCPS strongly encourages and prioritizes engagement with students to explore challenging, controversial, or emotionally charged topics in a manner that is both safe and constructive.

II. PURPOSE

The purposes of this policy are to implement the requirements of the Maryland Values Act and provide guidance for staff on interactions with immigration enforcement agents on school property.

III. DEFINITIONS

- A. *Administrative warrant* – A bureaucratic document that is signed by an immigration officer, not a neutral federal judge, and which does not grant an immigration enforcement agent the right to enter private spaces without permission.
- B. *Compliance visit* – A site visit conducted by a federal immigration official to check whether an institution or employer complies with certain immigration rules. For example, officials from the United States Citizenship and Immigration Services (USCIS) may occasionally visit the offices of employers with professional foreign workers to verify the nature of the work being performed. Such *compliance visits* do not entail 'enforcement' of the immigration laws within the meaning of this policy.

- C. *Confidential information* – Information maintained by PGCPs that (1) includes personally identifiable information regarding students, parents, staff, contractors, or volunteers; or (2) would not be available to an individual under the Maryland Public Information Act.
- D. *Designated building administrator* - An administrator in a non-school setting who has been identified by the CEO in writing as the administrator in charge of the building.
- E. *Designated PGCPs official* – An individual who works in the central office and has been designated by the Superintendent/designee to be the primary point of contact for issues related to immigration enforcement.
- F. *Exigent circumstance(s)* – An emergency that requires law enforcement or an immigration enforcement agent to act immediately to address a threat to public safety, without pausing to obtain the prior approval from a judge that the Fourth Amendment to the U.S. Constitution would typically require. *Exigent circumstances* include the following: imminent risk of death, violence, or harm to a person or property; hot pursuit of a dangerous suspect; and the imminent risk of the destruction of evidence of a crime.
- G. *Family safety plan* - A preparedness packet to ensure the safety and care of children and assets in case of detention or deportation. Key steps include identifying trusted caregivers, securing legal documents, knowing legal rights, and creating a contact list for emergencies.
- H. *Immigration enforcement agent* – An individual working for U.S. Immigration and Customs Enforcement (ICE), a federal agency within the Department of Homeland Security, or an officer with other federal law enforcement agencies who enforces U.S. immigration laws by identifying, arresting, detaining, and removing individuals who violate these laws.
- I. *Judicial warrant* – An unexpired, official court order signed by a judge or magistrate that authorizes a search of private property, seizure, or arrest. A judicial warrant will have a heading at the top of the document that shows it was issued by a court, such as the United States District Court. It will specify the address to be searched, specify the time period in which the search must take place, and particularly describe the place or person, or both, to be searched and the things to be seized.
- J. *PGCPs facilities* – Locations that are owned by the Board but are not schools, such as: Oxon Hill Development Center, the Bonnie F. Johns Educational Media Center, etc.
- K. *Private space* – A space in a sensitive location that is not open to the general public, e.g., school buses, classroom, or other instructional areas.
- L. *Sensitive location* – The following constitute a *sensitive location*:
1. A public school;
 2. A public library;
 3. A health care facility operated by units of the state or local government;
 4. A facility operated by the State Comptroller.
 5. A courthouse; or
 6. Any other location that provides State-funded services related to:

- a. physical or mental health;
 - b. education;
 - c. shelter care; or
 - d. access to justice; and
 - e. as determined by the Maryland Attorney General, which requires special consideration for immigration enforcement activities.
- M. *School Property* - All buildings, grounds, and land owned, leased, used, or operated by or on behalf of PGCPS for school administration or operations, including athletic fields, playgrounds, parking lots, walkways, and all areas of school buildings and other facilities. For this Policy, school property includes school buildings, grounds, and land utilized by the public charter to conduct educational programming and other school activities, regardless of who owns the building or property. School property also includes school buses and other vehicles (including vehicles operated by contracted vendors), as well as fixed equipment, utilized for school administration and operations.
- N. *Shelter-in-place* - A location(s) within the school building or facility protected by a barrier in which students and staff are placed.
- O. *Standby guardianship* – A process whereby a person (the standby guardian) is appointed by a parent of a child to take care of the child if the parent:
- 1. Dies or becomes mentally incapacitated;
 - 2. Becomes debilitated by an illness or injury; or
 - 3. Is subject to an adverse immigration action.
- P. *Unrestricted hallways* - Hallways that lead directly from one open space to another, without accessing a private space.

IV. STANDARDS

- A. The Superintendent/designee will provide training to staff and volunteers to make them aware of Policy 0130 – Interacting with Immigration Enforcement Agents, immigrant students’ rights to an education, and culturally responsive engagement of immigrant students and their families.
- B. All PGCPS facilities and schools in PGCPS are considered private spaces, except those locales that are open to the general public, such as the main lobby, main office, unrestricted hallways, etc.
- C. The Superintendent/designee shall ensure that all private spaces are marked with clear signage and that access to private spaces is limited to authorized categories of individuals.
- D. The Board does not consent to the conduct of immigration enforcement operations on school property. The Superintendent/designee shall not authorize any person seeking to enforce immigration laws to enter private spaces, except pursuant to a judicial warrant or where exigent circumstances require such access.
- E. School Resource Officers (SROs) and school security staff shall not perform a function of an immigration enforcement agent in relation to the investigation, apprehension, or detention of

immigrant students and their families.

- F. The Superintendent/designee shall designate a PGCPs official in the accompanying administrative procedure to be the primary point of contact for issues related to immigration enforcement.
- G. The Superintendent/designee shall develop a communication plan that addresses informing the community about immigration enforcement activities occurring in PGCPs schools.
- H. The Superintendent/designee shall make resources available to parents, including but not limited to:
 - 7. Information about the right of immigrant students to receive an education, including academic support for multilingual learners and special education services for students with disabilities;
 - 8. Information about students' educational record privacy protections;
 - 9. Information about legal and mental health resources; and
 - 10. Information about Family Safety Plans, including parental designation and consent to the beginning of standby guardianship.
- I. The Superintendent/designee shall ensure that staff receive professional development addressing the steps that they are required to take if immigration enforcement agents appear on school property, or during extracurricular events, and at school events. The training should include the following:
 - 1. Staff shall presume that the immigration enforcement agent is engaged in immigration enforcement. Staff shall contact the designated PGCPs official immediately and ask the immigration enforcement agents to wait in a lobby or other public space.
 - 2. If the immigration enforcement agents demand immediate access to private spaces in the school or PGCPs facility without waiting for the school's communication with the designated PGCPs official, staff shall state that they do not consent to such access but should not attempt to stop or impede the immigration enforcement agents, and shall direct the individual to the principal/designee or designated building administrator. As promptly as possible, the principal/designee shall contact the designated PGCPs official and make a record of the incident, including notes about the verbal exchange with the immigration enforcement agents, identifying details about the immigration enforcement agents, such as: the immigration enforcement agents' credentials (name, agency, and badge number), the names of all persons they intend to contact, the nature of the immigration enforcement agent's business at the school or PGCPs facility, a copy of the administrative or judicial warrant, the date and time of the immigration enforcement agents' visit, the immigration enforcement agents' actions, any arrests or other results of those actions, and the identity of other staff witnesses.
 - 3. In no circumstances shall staff interfere with the immigration enforcement agents, attempt to make them leave a public space, attempt to conceal any person from the immigration enforcement agent, or attempt to assist any person in evading the immigration enforcement agent.

4. The principal/designee shall request and maintain records of all immigration enforcement activities at the school or PGCPs facility, including the agent's name, badge number, or other official identifying information, agency, purpose of visit, and proposed action to be taken at the school or PGCPs facility.
5. If an immigration enforcement agent requests access to private spaces within a school or PGCPs facility to conduct enforcement action, the designated PGCPs official may authorize such access only if the immigration enforcement agent:
 - a. asserts that exigent circumstances exist; or
 - b. possesses a valid judicial warrant.
6. If the immigration enforcement agent presents a judicial warrant, the principal/designee shall immediately share a copy of it with the designated PGCPs official to determine the legitimacy of the warrant. The designated PGCPs official shall:
 - a. confirm that the heading shows the document was issued by a court;
 - b. confirm that a U.S. District Court Judge or Magistrate signed it;
 - c. confirm that it lists the particular school or PGCPs facility among the places to be searched for a wanted person or evidence; and
 - d. Verify that the document has not expired.
7. If the immigration enforcement agent denies the principal/designee the opportunity to consult with the designated PGCPs official about the judicial warrant or the existence of exigent circumstances, or if the immigration enforcement agent only possesses an administrative warrant, or proceeds into private space without a judicial warrant or exigent circumstance, the principal/designee shall state that they do not consent to the agents' entry, state that the immigration enforcement agents lack permission, ask them to leave, but shall not block or impede their access. The principal/designee must immediately notify the designated PGCPs official of the situation.

J. Requests for Records or Information

- a. If immigration enforcement agents request records or information about students or employees, the principal/designee shall contact the designated PGCPs official and refer the immigration enforcement agents to the designated PGCPs official.
 - 1) The principal/designee shall request and record the immigration enforcement agent's identifying information (name, badge number or other official identifying information, agency), purpose of their visit, and proposed action to be taken, and obtain a copy of any documentation supporting the immigration enforcement agent's request, such as an administrative subpoena, judicial subpoena, or court order, and forward it to the designated PGCPs official to review and address.
 - 2) If the immigration enforcement agent presents a judicial search warrant or asserts that exigent circumstances exist to search a private place, the principal/designee immediately shall, as applicable, share the details of the exigent circumstances with the designated PGCPs official or share a copy of the judicial warrant so that the designated PGCPs official may determine the legitimacy of the alleged exigent circumstances or warrant. If there is a warrant, the designated PGCPs official shall:
 - a) confirm that the heading shows the document was issued by a court;

- b) confirm that a U.S. District Court Judge or Magistrate signed it;
 - c) confirm that it lists the particular school or PGCPs facility among the places to be searched for a wanted person or evidence; and
 - d) verify that the document is not expired.
- 3) If the immigration enforcement agent proceeds to search a private space without exigent circumstances or a judicial warrant, the principal/designee shall notify the designated PGCPs official, state to the immigration enforcement agent that they lack permission, but staff shall make no effort to resist or block the immigration enforcement agent.
- K. The Superintendent/designee shall, to the extent allowed by the Family Educational Rights and Privacy Act (FERPA), notify the affected student's parents/guardians of any immigration enforcement activity concerning their child, including any request for information relating to immigration enforcement, contact, and interview.
- L. If there is reason to suspect that a student or staff member has been taken into custody as a result of an immigration enforcement action, the Superintendent/ designee shall notify the person's emergency contact immediately upon notification.
- M. The Superintendent/designee shall maintain a contact list of legal services providers who provide legal immigration representation at no or low cost to all students, parents, or guardians who request it. The list shall include, but is not limited to, the organization's name and contact number, email address, and office address. The Board does not endorse and is not responsible for the legal services obtained from providers on the list.
- N. PGCPs resources, including non-school entities operating on PGCPs properties or with PGCPs resources, shall not be used for immigration enforcement activities.
- O. A school will enact shelter-in-place when immigration enforcement agents are confirmed to be present on school property. The school may enact a shelter-in-place based on the professional judgement of the school principal if an immigration agent is within 1,000 feet on school/facilities grounds.
- P. The Superintendent/designee shall designate an on-site staff member to:
 - 1. Confirm such a sighting;
 - 2. Initiate and conclude a shelter-in-place; and
 - 3. Immediately communicate the situation to students' emergency contacts.
- Q. Compliance Visits
 - 1. The requirements of the Maryland Values Act do not apply to compliance visits by immigration officers. To maintain good standing in a work or student visa program, it is important for PGCPs to cooperate with officials on such visits.
 - 2. However, to ensure compliance with the Maryland Values Act and this policy, a school principal/designee or designated building administrator should at first presume that any federal immigration official who appears on school property is engaged in immigration enforcement. Therefore, staff should not grant DHS officials immediate permission to enter restricted, private spaces simply because the official states they are

conducting a compliance-related visit. Instead, staff should refer the DHS official to the principal/designee, or designated PGCPS official to verify the nature of the official's business and ensure that they do not have a law enforcement purpose (*i.e.*, they do not have the intention or authority during the visit to make an arrest or search for evidence that an individual may be subject to removal).

3. When a principal/designee or grants DHS officials access to a school or PGCPS facility for a compliance visit, the staff member should state clearly that they consent only to the agent's entry for that specific purpose.

V. IMPLEMENTATION RESPONSIBILITIES

The Superintendent shall develop an administrative procedure to implement this policy.

VI. REFERENCES

A. Legal

Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations

Maryland Values Act (HB 1222; 2025 session):

MD. CODE ANN., CRIM. PRO. § 2-104 and § 2-104.2

MD. CODE ANN., GP §§ 4-101, et seq., including §§ 4-320.1 and 4-501 MD. CODE ANN., ST. GOVT. § 1-101, § 6-111, and § 10-1702

Other Policies and Administrative Procedures

B. Relevant Data Sources

Immigration Guidance for Facilities that Serve the Public: Implementation of HB 1222 (Maryland Values Act), issued by the Maryland Office of the Attorney General

C. Other

VII. HISTORY

Policy Adopted	03/26/2026
Policy Amended	03/26/2026
Policy Reviewed	03/26/2026
Effective	03/26/2026