

College Federal Law Enforcement Encounter Action Plan

The College Federal Law Enforcement Encounter Action Plan is designed for Clackamas Community College to provide clarity on roles, responsibilities and response actions.

Objective

To protect the rights and safety of students and employees during any interaction with federal law enforcement on our campus(es), such as Immigration and Customs Enforcement (ICE), in compliance with Oregon sanctuary laws and federal privacy regulations.

For purposes of this plan, the term “federal law enforcement” includes, but is not limited to, agencies or officers that meet the definition of a federal immigration authority as defined in Oregon HB 4079. This response plan will not be activated, nor will emergency notification procedures be initiated, for routine administrative or compliance-related visits, such as annual federal verification visits with the college registrar, when such activities do not constitute immigration enforcement activity under Oregon HB 4079.

Phase 1: Immediate Response

1. Identify and Alert

If federal law enforcement is seen on campus (e.g., entering a classroom or parked in a vehicle in a college parking lot):

- Do not engage directly.
- Immediately notify College Safety at 503-594-6650.
- College Safety will notify the Vice President of Finance and Operations or Designee (e.g., Director of College Safety).
- College Safety will notify the Public Information Officer (PIO).
- PIO will:
 - Notify Executive Team and the following identified lead administrators:
 - Director of Adult Education
 - Director of Harmony and Wilsonville campuses
 - Send text and email to employees and students using Emergency Notification System
 - Communication templates on file with College Relations and Marketing and College Safety

If federal law enforcement contacts you directly or attempts to enter a location you believe is not allowed:

- Do not engage directly unless they require it. Ask them to communicate with College Safety for their request.

- Immediately notify College Safety at 503-594-6650.
- If they insist on communicating with you or request information, advise that you must refer them to College Safety to help them get in touch with the appropriate authority for releasing information or gaining permission.
 - [Immigration and Customs Enforcement Public Space Guidance](#) and staff scripts
- If they attempt to gain access or order you to get out of their way:
 - Step back, comply with their direct order in the moment.
 - Advise them you are not giving permission and believe they are violating state and federal law by forcing entry without legal authority.
 - DO NOT INTERFERE or RESIST.
 - You may document the interaction with video recording, but must warn everyone present if you are verbally recording the conversation.
- College Safety will notify the Vice President of Finance and Operations or Designee (e.g., Director of College Safety).
- College Safety will notify the Public Information Officer (PIO).
- PIO will:
 - Notify Executive Team and the following identified lead administrators:
 - Director of Adult Education
 - Director of Harmony and Wilsonville campuses
 - Send text and email to employees and students using Emergency Notification System
 - Communication templates on file with College Relations and Marketing and College Safety.

If you observe an active federal law enforcement operation on a CCC campus (Oregon City, Wilsonville, Milwaukie)

- Do not engage directly.
- Immediately notify College Safety at 503-594-6650
- College Safety will notify the Vice President of Finance and Operations or Designee (e.g., Director of College Safety).
- College Safety will notify the PIO.
- College Safety will work with PIO to check with social media, local news, local school districts, and police departments in an attempt to verify.
- College Safety will notify PIO of confirmation or false alarm.
 - If confirmed nearby presence, PIO will notify Executive Team and Director of Adult Education and Director of Harmony and Wilsonville campuses.

2. Initial interaction

If on a campus, College Safety or a college administrator will politely ask federal law enforcement officers to remain in public areas.

- Our campuses are open to the public. However, federal law enforcement officers are not allowed entry to “limited-use space” classrooms, offices or other non-public spaces without a judicial warrant, probable cause, or in active pursuit.
- Employees should not interfere with or disrupt any law enforcement officer(s) serving an arrest or search warrant (e.g., do not physically touch or block law enforcement personnel).
- The Vice President of Finance and Operations or College Safety will record and share the following information with Dean of Academic Foundations and Connections and Chief Culture and Impact Officer:
 - Names and badge numbers of federal law enforcement agents.
 - Time, location, and nature of the encounter.
 - Any documents presented.
 - Actions taken by staff or agents.
- Dean of Foundations and Connections or Designee (e.g., Chief Culture and Impact Officer) will text information outlining the incident to Portland Immigrant Rights Hotline at 888-622-1510.

3. Request Documentation

- Vice President of Finance and Operations or College Safety will ask federal law enforcement officers to present a judicial warrant signed by a judge.
 - Vice President of Finance and Operations or College Safety will verify warrants.

4. Notify Legal Counsel

- The Vice President of Finance and Operations or College Safety will immediately contact the college’s legal support for guidance.

Phase 2: Support

5. Support Students and Employees

- College leadership (e.g., managers, supervisors) will provide on-site support.
- Employees should first ensure they and their own areas are safe, then assist students requesting support. Follow all directions provided by College Safety communications.
- The college will provide access to:
 - [Resources and Legal aid referrals](#)
 - [Counseling Department services](#)
 - Emergency Assistance Program (EAP) for employees
 - Emergency academic accommodations, if needed
- Tips for additional ways to support:
 - Be a visible presence for students, staff, faculty, administration, and community members.

- If possible, answer questions about College Safety alerts or other communications.
- If federal law enforcement is confirmed on campus, stay calm. The presence or activities of federal law enforcement may create disruption. Try to keep everyone calm. Support students and colleagues as best as possible. For help and additional resources, reach out to a dean or supervisor.
- Remain with students, if needed.
- Ask if anyone needs assistance while waiting for the all-clear message.
- Faculty: Provide flexibility for students who may miss class due to disruption.
 - [Resources for teaching during federal law enforcement activity](#)

Phase 3: Post-Incident Review

6. Report Incident

- The Director of College Safety will create an official incident report to keep on file and to submit to the Vice President of Operations & Finance.
- The Vice President of Operations & Finance will review the report with legal counsel if necessary.
- IF determined necessary the Vice President of Operations & Finance in collaboration with the Chief Culture and Impact Officer will:
 - Submit a formal report if any violations of Oregon sanctuary laws occurred.
 - Call the Sanctuary Promise Hotline: 1-844-924-STAY
 - Text information outlining the incident to the Portland Immigrant Rights Hotline at 888-622-1510.
- PIO to report incident to elected federal delegation of field representatives.

7. Debrief and Evaluate

- Chief Culture and Impact Officer in collaboration with the Executive Team will hold a debriefing session with the Director of Adult Education and Director of Harmony and Wilsonville campuses to determine the need for follow-up support as appropriate.
 - Review what went well and what needs improvement.

8. Update Protocols

- College Safety, with appropriate advisement from other college personnel, will revise training materials and response plans based on lessons learned.

Ongoing Preparedness

Annual training

- FERPA and student privacy
- College emergency, safety and federal law enforcement response protocols

Student education

- Host “Know Your Rights” workshops
- Distribute multilingual materials on legal rights and emergency contacts

Community partnerships

- Maintain active relationships with:
 - Legal aid organizations
 - Immigrant advocacy groups
 - Local law enforcement (for coordination, not enforcement)
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Applicable State & Federal Statutes and Oregon Sanctuary Laws

- Oregon has been a sanctuary state since 1987, with laws codified under ORS 180.805, 180.810 and 181A.820–181A.829.
- These laws prohibit state and local law enforcement and public bodies from using resources to assist federal immigration enforcement, including:
 - Sharing immigration status or citizenship information without a judicial subpoena.
 - Utilizing public funds, equipment or personnel for the purpose of detecting or apprehending individuals subject to immigration enforcement.
 - Granting access to any area that is not normally open to the public without a judicial warrant.
- Oregon House Bill 4079: Relating to policies for when federal immigration authorities enter public education property; and prescribing an effective date.

FERPA (Federal Law)

- The Family Educational Rights and Privacy Act (FERPA) protect student education records.
- Schools cannot release personally identifiable information without written consent, a subpoena or a court order.

Sanctuary Promise Act (2021 Update)

- Strengthens previous sanctuary laws by allowing individuals to sue if local agencies violate the provisions of ORS 181A.820 – 181A.832.
- The Sanctuary Promise Hotline (1-844-924-STAY) is available to report violations.