

To: All Cooperative Extension Staff

From: Shelley King-Curry, Director of Diversity and Inclusion
Office of the Dean and Director

Date: November 06, 2018

Re: Procedures and Guidelines for Carrying Out Immigrant Policy (Updated
November 2018)

Colleagues,

This document provides guidance pertaining to concerns regarding immigrant clientele who are participants in programs. In consultation with the UW-Madison Office of Legal Affairs, here is an updated summary of procedures and responses to potential actions conducted by U.S. Immigration and Customs Enforcement Officers (ICE). These are in alignment with *Cooperative Extension's Outline of Policies on Unauthorized Immigrants Participating in our Programs*:

- 1.) If ICE attends a program or event and an educator becomes aware:
 - a. We may ask for that person's name and badge #.
 - b. We may also inquire as to the nature of their attendance.
 - c. If they are there for purposes related to screening or investigating, we can require that they provide us with a warrant.

Note: If ICE comes to an Extension program or event and says they are there to arrest or detain someone, we cannot prevent them from doing so.

- 2.) If an educator or county office receives a warrant for release of information to ICE:
 - a. Upon receipt, please contact the Area Extension Director. The AED will contact their Assistant Director and forward such warrant to the Dean's Office. We will forward that to the UW-Madison Office of Legal Affairs for their review and counsel before proceeding.
- 3.) If we receive a request for personal data for any program clientele:
 - a. We will not provide personal data, such as address, phone number, or financial information to ICE without first receiving a warrant.
- 4.) How can we respond to pushback and at the same time provide support to our mission, which includes the delivery of programs to "illegal immigrants"?
 - a. *Response:* "Yes, it is possible for unauthorized immigrants to participate in our program(s), because we don't collect that information and because of Civil Rights laws we don't discriminate. We work directly with our partners to determine need and recruit audiences for our programs and to make them available."

- 5.) How can we be sensitive to the emotional disruption that the recent activities related to ICE bring to participants and their families and friends?
- a. Communicate to clientele that we will never voluntarily release participant information unless required to do so under a subpoena or other legal process
 - b. Refrain from requesting information from clientele that is not required for program delivery. Colleagues must perform due diligence to ensure that Extension does not have immigrant status information on program participants unless required to do so by law. Regularly review your records to make sure this type of information has not found its way into your hands.
 - c. Collaborate with community partners and other stakeholders to help recruit clientele and to arrange and determine locations of programs
 - d. Make use of Cooperative Extension marketing resources for ready identification of our brand and identity; includes use of name badge when working in the community