Navigating Immigration Enforcement Operations — FAQs to Help Camps Prepare

What are concrete and legal knowledge and steps we, as camp staff, can take to protect our vulnerable campers, parents, and international staff from ICE presence on our private camp property?

Take the time to prepare for ICE presence. This includes identifying a person who will serve as the "greeter" should ICE arrive on any camp property (this person will be the point of contact if special agents arrive and their role is to contact the ICE "visit manager"). Second, identify an ICE "visit manager" who will be responsible for communicating with special agents, reviewing any legal document provided, and contacting immigration counsel. After identifying and training the individuals who will be in these two roles, consider holding an open discussion with staff regarding the possibility of immigration enforcement activities and communicate (at a high level) the camp's immigration enforcement response strategy.

What should camps absolutely be aware of regarding ICE, etc., and our international staff?

Camps should be aware of the types of legal documents that may be presented to a camp by a special agent as well as the legal authority those documents provide to the government. This includes knowing the difference between a judicial warrant, administrative warrant, and Notice of Inspection.

If ICE arrives and does not have proper warrants, are we legally able to bar their entry or ask them to leave?

Yes. In order to enter your property, ICE will need to have the proper legal authority to do so. ICE (and any other law enforcement agents) are only authorized to enter camp property if a camp is presented with a judicial warrant. You can identify a judicial warrant because it will be issued by a federal or state court and it will be signed by a judge or magistrate judge. The document will also state that it is a "warrant."

What is different this year vs. others in this sense? Should we expect ICE for dinner — you know what I mean . . . will they be on the camp circuit this summer?

Whether a camp is more (or less) likely to interact with ICE officials depends on a host of factors including the demographics that they serve, the populations that they employ, and their geographic location. Individual camps should assess their own risk against these risk factors and if they feel that their risks exceed their comfort level, they should consider developing a raid response plan in conjunction with immigration counsel in order to help control the environment should immigration enforcement arrive at camp.

How soon do we need to report any serious incident or infraction?

From an immigration perspective, there is no reporting requirement to the government when a foreign national interacts with law enforcement or the courts. However, foreign nationals should understand that the government will likely learn this information. Foreign nationals who are concerned about the consequences of visa revocation because of legal trouble should contact immigration counsel immediately.

I need help understanding the differences between and if there should be different approaches with ICE vs. CBP vs .other law enforcement (police, Coast Guard, etc.). For reference, our camp in right on the Canadian border.

The information provided during the May 13, 2025, presentation and in these Q&A responses regarding immigration enforcement apply to all law enforcement officials (whether they are ICE, a police officer . . . etc.).

Should staff carry their documents with them when leaving camp? Would copies in the camp office be acceptable?

DHS guidance suggests that foreign nationals in the United States should carry original status documents with them at all times. Because replacing such documents should they go missing can be quite burdensome, our advice is for foreign nationals to carry color copies of their status documents including passport ID page, visa stamp page (if relevant), Form I-94 Arrival/Departure Document, and keep the originals in safe keeping.

What is the best response if ICE shows up at camp?

Whomever a camp designates as the camp's "greeter" should immediately contact the "ICE visit manager," who should in turn politely ask to review any legal document that immigration enforcement claims to have. The "ICE visit manager" should then promptly contact immigration counsel to provide them with a copy of that legal document. Throughout the process, the "ICE visit manager" should repeat that they are <u>cooperating</u>, but that they need to work with counsel regarding next steps.

What if ICE comes to camp?

See above discussion about identifying a "greeter" and "ICE visit manager."

How to best respond if ICE arrives at my camp to protect my campers and staff?

See above discussion about identifying a "greeter" and "ICE visit manager."

Camp's rights if ICE shows up to camp for campers?

Camps have a right to inspect the legal document that is provided by any special agent and a right to call immigration counsel. If the legal document is not a judicial warrant, camps have authority to deny special agents entry to the property.

Should we expect a visit from ICE at camp this summer?

See above discussion about risk factors that camps should assess to determine the likelihood of an ICE visit.

Do you have any suggestions on best practices for international campers keeping documentation on them at camp?

International campers should bring the documents required to evidence their status. Camps should retain these documents in a safe, dry place for its international campers, particularly those international campers who are young. While international campers are travelling (i.e., on a day trip off-property), a trusted adult who is also participating in the activity should carry copies of those documents.

Anything specific we should be sharing with staff as far as knowing their rights?

Camps may consider posting "Know Your Rights" material in staff-only areas (i.e., on a bulletin board in a break room). Camps should avoid directing Know Your Rights material to any one individual and instead be sure that any effort to share this material is shared broadly.

We are interested in a recommended response to ICE if they are a) looking for a youth camper or b) looking for an adult staff member.

When a youth camper is in their care, camps step into the role of a youth camper's parents. Camps should therefore be diligent with respect to reviewing any legal document that ICE purports to have. If ICE is looking for an adult staff member, camp officials should similarly review the legal document in detail to determine what authority it gives to the official.

Is there a printed list of rights I can have my staff have on them at all times?

There are several organizations that publish "Know Your Rights" material. For example, the American Immigration Lawyers Association has several available on its website that are available for public review and download.

Is it foolish to be worried about the potential of them coming to our camp? We have about 40 international staff and I'm terrified something is going to happen to them.

See above discussion about risk factors that camps should assess to determine the likelihood of an ICE visit. It is true that camps that have a higher proportion of foreign national staff may have a higher likelihood of an ICE visit. However, that is not the only risk factor that ICE uses in determining which businesses to target. Moreover, we have seen reports of ICE entering what were previously considered to be safe spaces, like schools and hospitals. Understood within that context, there is nothing about being a camp, per se, that will protect it from ICE enforcement activities.

Do we have to comply with the Alien Registration Requirement with finger printing?

Any foreign national who is 14 years or older and who has not been registered and fingerprinted and who will be in the US for 30 days or longer (consecutively) must register. Many foreign nationals will have already registered (i.e., those who received a Form I-94 when entering in the US, those who are lawful permanent

residents . . . etc.). Among the populations that camps serve and employ, this is most likely to impact Canadian visitors who enter the United Sates at land ports of entry who were not issued an I-94. Those individuals who intend to register should consider seeking a legal opinion from an immigration attorney as to whether registration is required for them.

If we have agencies show up during camp, after parents have left, what are we required to do if someone asks for a minor, or participant who is 18–21?

See above for discussion of how to treat minor campers as compared to adult staff members.

I run a day camp through a municipality. A few of my staff are international. One staff person has specifically brought up that she's terrified of ICE coming and taking her away. How can I reassure her? What legal protections can we offer her as a way to soothe her fears?

There are no legal protections that you may offer your staff members. You may consider providing Know Your Rights material generally in staff-only locations on a camp site that your staff may then read on their own.

What resources do you suggest to give families who mention this issue to us?

Consider directing families to trusted immigration news resources like NBC News, the Associated Press, and publications by the American Immigration Lawyers Association.

What if ICE visits camp to remove campers?

See above discussion about camps stepping into the shoes of minor camper's parents in the event of an ICE visit.

Does our response differ if they visit our owned property versus a venue we have rented for the day (church, state park, program partner)?

Your response will not differ if ICE were to visit a private venue that you own versus a private venue that you rent (*i.e.*, a church, state park, or program partner). However, you should be aware that the owner of property has the authority to consent to ICE entering and searching your property. Consequently, if you are renting a property, you should be aware that the owner of that property will also have authority to consent to an ICE search if the owner chooses to do so.

How can we prep staff to interact with enforcement officers?

See above discussion about identifying an "ICE visit manager" and a "greeter." Individuals in both roles should be trained about what their responsibilities are. In addition, consider holding an open discussion with staff regarding the possibility of immigration enforcement activities and communicate (at a high-level), the camp's immigration enforcement response strategy.

Do you have any suggestions on actions to take or prep to help if international campers get picked up in enforcement actions?

In the unlikely event that an international camper was to be detained by ICE or other special agents, the camp should contact the camper's family to inform them of what has happened. There are no other actions that a camp will be able to take with respect to the camper.

What is the best advice for staff on how to manage an interaction with ICE when they are off camp on trips/time off etc.?

It is unlikely, but not impossible, that staff will encounter ICE while on day trips. If they do, those staff members should be trained to call a supervisor (the ICE Visit Manager) and then send a photo of any purported legal document ICE claims to have to that supervisor. If staff encounter ICE while they are on a day off, they should cooperate but understand their rights, which include to remain silent, seek immigration counsel, not sign anything they do not wish to sign, and to refuse to show identity documents that reveal country of nationality or citizenship.

How likely is ICE to show up at camp and what would make them more/less likely to visit?

In assessing the likelihood of whether ICE may appear at camp, camps should assess risk factor, such as the demographics that they serve, the populations that they employ, and their geographic location.

Do we have to allow ICE agents onto camp property?

You are only required to allow ICE agents, or any other government agent, to enter your property when the agent provides you with a valid judicial warrant. You can identify a judicial warrant because it will be issued by a federal or state court and it will be signed by a judge or magistrate judge. The document will also state that it is a "warrant."

When an incident is reported such as an intern receiving a DUI, does the visa get revoked immediately, or does the sponsor wait until after the court proceedings and a final outcome before making a decision?

From an immigration perspective, there is no reporting requirement to the government, even for sponsoring employers. However, foreign nationals should understand that the government will likely learn this information. Foreign nationals who are concerned about the consequences of visa revocation because of legal trouble should contact immigration counsel immediately.

If ICE is asked to leave, are we legally able to inform others of their arrival? If the person who they were there to talk to is no longer there when they return, could there be legal risk?

If ICE arrives and is looking for a particular person, a camp should certainly inform the staff member that ICE is there and that ICE wishes to speak with them. What the staff member does from that point forward is up to them, but the camp cannot help that person avoid immigration arrest. That would be harboring, which is a criminal act.