



Office of University Counsel
Guidance for Faculty and Staff Regarding U.S. Immigration and Customs Enforcement (ICE)
January 24, 2025

As Seattle University continues its efforts to support our non-citizen students, the Office of University Counsel has updated its guidance regarding U.S. Immigration and Customs Enforcement (ICE) on campus.

Are college and university campuses still defined as “sensitive” or “protected” locations where ICE enforcement actions are limited?

- No. On January 21, 2025, the Acting Secretary of Homeland Security announced the rescission of prior ICE guidance on “sensitive” or “protected” locations.
 - Since 2011, ICE had operated under internal guidance memoranda that prohibited ICE agents from engaging in enforcement actions (arrests, interviews, searches, or surveillance) at “sensitive locations” such as colleges and universities, with limited exceptions.
- The Office of University Counsel will monitor any changes to ICE’s guidance or enforcement trends in the months ahead.

Does ICE need a warrant to access SU’s campus?

- ICE agents must have a search or arrest warrant to access nonpublic areas of campus (areas not open to the public such as residence hall or apartment rooms, classrooms, or faculty offices).
- Areas open to the general public (public space such as the upper and lower mall, lobbies and hallways of buildings, the Quad, University Green, and Seattle University Park) are also open to ICE agents, and they may enter without a warrant.

What should faculty or staff do if ICE agents ask to enter non-public areas of a university building?

- In **all** cases, faculty or staff should ask ICE agents to wait to enter any nonpublic areas until contacting the Office of University Counsel at **(206) 296-2043**. After hours, contact Public Safety’s 24-Hour non-emergency line at **(206) 296-5990**.
- Faculty and staff are not required to permit ICE agents to enter nonpublic areas without a warrant. Faculty and staff should not accept service of a warrant or subpoena and should instead refer agents to the Office of University Counsel.
 - Faculty and staff should remain polite and may wish to say, **“I understand you are here for law enforcement purposes, but I am not authorized to grant you permission to enter nonpublic areas or accept any documentation on behalf of the university,”** then refer the agents to the Office of University Counsel.

What should faculty or staff do if ICE contacts them and asks for information about a student or a student’s education record?

- Faculty or staff who receive a request from ICE for **any** information about a student (including “directory information” defined in SU’s [Student Records Guidelines](#)) or access to University property, should contact University Counsel at **(206) 296-2043**. During after-hours, contact Public Safety’s 24-Hour non-emergency line at **(206) 296-5990**.
- Consistent with FERPA, SU does not voluntarily share student information with ICE or any other law enforcement officials without a student’s prior consent unless a narrow and specific FERPA exception applies.
 - Faculty and staff may wish to say, **“I understand you are requesting student information, which, consistent with the university’s FERPA guidelines, I am not authorized to provide,”** then refer the agents to the Office of University Counsel.

What should faculty or staff do if they observe ICE agents/officers conducting enforcement activities on campus?

- Faculty or staff should immediately contact the Office of University Counsel at **(206) 296-2043**. After hours, contact Public Safety’s 24-Hour non-emergency line at **(206) 296-5990**.
- Faculty and staff should remain polite but should also document the activities they observe, if possible.