



JULIA LEE PERFORMING ARTS ACADEMY

Immigration Enforcement Protection Policy

Adopted: February 20, 2026

I. POLICY STATEMENT

Julia Lee Performing Arts Academy (JLPAA) is committed to providing a safe, secure, and welcoming learning environment for all students, families, and staff, regardless of immigration status or national origin. This policy establishes procedures to protect the privacy and safety of students and families in compliance with California law, including **Assembly Bill 49 (AB 49)**, **Senate Bill 98 (SB 98)**, **Assembly Bill 495 (AB 495)**, and the **California Safe Haven Schools Act**.

Under the U.S. Constitution and California law, all children have the right to receive a free public education without regard to their immigration status. JLPAA will not discriminate against any student or family based on actual or perceived race, color, national origin, citizenship, or immigration status.

This policy was developed in accordance with the Attorney General's model policies updated in December 2025 and is effective as of March 1, 2026.

Key Statutory Requirements: Pursuant to Education Code Section 234.7, all charter schools must adopt policies by March 1, 2026 that limit assistance with immigration enforcement and protect student and family information. This section prohibits school officials from collecting citizenship or immigration information, requires notification when immigration enforcement requests information or access, and mandates that schools not provide access to nonpublic areas or disclose information without a valid judicial warrant, judicial subpoena, or court order.

II. LEGAL AUTHORITY

This policy is based on the following legal authority:

- Education Code Section 234.7, as amended by AB 49, SB 98, and AB 495
- Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g
- California Values Act (Senate Bill 54), Government Code Section 7284.4 et seq.
- California Attorney General’s Guidance, “Promoting a Safe and Secure Learning Environment for All” (December 2025)
- Plyler v. Doe, 457 U.S. 202 (1982)

III. DEFINITIONS

Immigration Enforcement: Any and all efforts to investigate, enforce, or assist in the investigation or enforcement of any federal civil immigration law, and any and all efforts to investigate, enforce, or assist in the investigation or enforcement of any federal criminal immigration law that penalizes a person’s presence in, entry, or reentry to, or employment in, the United States.

School site: An individual school campus of JLPAA, an area where a JLPAA school-sponsored activity is currently being held, or a school bus or other transportation provided by JLPAA.

Nonpublic Area: Areas of the school site where access is restricted and not available to the general public without authorization. This includes classrooms, hallways, administrative offices, gated playgrounds, enclosed parking lots, interior areas of school buildings, and school buses. Public areas may include main entrances, lobby areas, and open public parking areas.

Judicial Warrant:

A valid warrant must be a judicial warrant or court order issued and signed by a federal, state, or local judge or magistrate. Administrative warrants or documents signed only by an ICE or Department of Homeland Security officer does NOT constitute valid judicial warrants, and will not be accepted. This includes, but is not limited to, ICE administrative warrants such as Form I-200 (Warrant for Arrest of Alien) and Form I-205 (Warrant of Removal/Deportation).

Personal Information: Any information maintained by JLPAA that identifies or describes an individual, including name, social security number, physical description, home address, home telephone number, education, financial matters, medical or employment history, and statements made by or attributed to the individual.

IV. GATHERING AND HANDLING STUDENT AND FAMILY INFORMATION

A. Prohibition on Immigration Status Inquiries

1. JLPAA personnel shall NOT inquire specifically about a student's citizenship or immigration status or the citizenship or immigration status of a student's parents or guardians.
2. JLPAA personnel shall not seek or require, to the exclusion of other permissible documentation, documents that may indicate immigration status, such as a green card, passport, or citizenship papers.
3. JLPAA shall not collect information or documents regarding citizenship or immigration status unless explicitly required by state or federal law to administer a specific program.

B. Enrollment Procedures

4. JLPAA shall accept multiple forms of documentation to establish residency and age for enrollment purposes, including (Education Code Section 48204.1 for residency; Education Code Section 48002 for age):

For Proof of Residency:

- Property tax payment receipts
- Rental property contract, lease, or payment receipts
- Utility service contract, statement, or payment receipts
- Pay stubs
- Voter registration
- Correspondence from a government agency
- Declaration of residency executed by the parent or guardian

For Proof of Age:

- Certified copy of birth record
- Statement by local registrar or county recorder certifying date of birth
- Baptism certificate
- Passport
- Affidavit of parent, guardian, or custodian

5. JLPAA shall note the method by which a student's age was verified but is not required to retain a copy of the document used.

C. Social Security Numbers

6. JLPAA shall not collect or solicit Social Security numbers or Social Security cards from students or parents/guardians for enrollment purposes. (Education Code Section 49076.7)

7. If collection of the last four digits of an adult household member's Social Security number is required to establish eligibility for a federal benefit program (e.g., free or reduced-price meals), JLPAA shall explain the limited purpose and clarify that failure to provide this information will not bar enrollment.

8. Families without Social Security numbers may still qualify for benefits if they meet income eligibility requirements.

V. SHARING INFORMATION WITH IMMIGRATION

ENFORCEMENT

A. General Prohibition

9. JLPAA and its personnel shall NOT disclose or provide, in writing, verbally, or in any other manner, any education records or personal information about a student, their family or household, or any school employee or teacher to an officer or employee conducting immigration enforcement UNLESS presented with a valid judicial warrant, judicial subpoena, or court order.

10. ICE administrative warrants (Forms I-200 or I-205) do NOT satisfy this requirement and do NOT authorize disclosure of information.

B. Response Procedures

Upon receiving any request for information for immigration enforcement purposes, JLPAA personnel shall:

11. Immediately notify the Principal or designated administrator.

12. Ask for valid identification and document the officer's name, badge number, agency, and contact information.

13. Ask for and make a copy of any documentation provided by the officer.

14. Consult with JLPAA legal counsel before providing any information or records.

15. Document all interactions in writing, including date, time, persons involved, and nature of request.

16. Report the incident to the Bureau of Children's Justice at the California Department of Justice at BCJ@doj.ca.gov.

C. Written Consent Requirements

If JLPAA determines that disclosure is legally required, written consent from parents or guardians must include:

- Signature and date of parent, guardian, or eligible student
- Description of records to be disclosed
- Reason for disclosure
- Party or class of parties receiving the information

VI. ACCESS TO SCHOOL SITES FOR IMMIGRATION

ENFORCEMENT

A. Registration Requirement

17. All outsiders, including immigration enforcement officers, must register with the Principal or designee upon entering school grounds during school hours.
18. Signs shall be posted at all school entrances notifying visitors of registration requirements.
19. JLPAA shall clearly designate which areas of campus are nonpublic.

B. Prohibition on Nonpublic Area Access

20. JLPAA personnel shall NOT allow an officer or employee conducting immigration enforcement to enter any nonpublic area of a school site without a valid judicial warrant, judicial subpoena, or court order.
21. If practicable, JLPAA personnel shall ask for valid identification from any person seeking to enter a nonpublic area.
22. JLPAA retains the right to consult with legal counsel and to challenge the validity of any warrant, subpoena, or court order in a court of competent jurisdiction.

C. Response Protocol When Immigration Officers Arrive

When an immigration enforcement officer arrives on campus, JLPAA personnel shall:

23. Immediately notify the Principal or designated administrator.
24. Advise the officer that before proceeding, school personnel must receive notification and direction from the Principal or administrator, absent exigent circumstances.

25. Ask to see and copy the officer's credentials (name, badge number, supervisor contact).
26. Ask for the reason for being on school grounds and document it.
27. Request and copy all documentation authorizing school access.
28. Contact JLPAA legal counsel before permitting access or providing information:

YM&C
Mariam Babayan
500 Ygnacio Valley Road, Suite 1980
Walnut Creek, CA. 94596
Phone: 916-646-1400 | Fax: 916-646-1300
mbabayan@mycharterlaw.com

D. Types of Documentation and Response

ICE Administrative Warrant (Forms I-200 or I-205):

- Does NOT authorize access to nonpublic areas
- Does NOT authorize disclosure of student or employee information
- JLPAA personnel shall inform the officer they cannot consent without consulting legal counsel

Federal Judicial Warrant (Search-and-Seizure or Arrest Warrant):

- Issued by a federal judge or magistrate
- If feasible, consult with JLPAA legal counsel before providing access:

Mariam Babayan
Phone: 916-646-1400 | Fax: 916-646-1300
mbabayan@mycharterlaw.com

- Administrative or Judicial Subpoena:
- Immediate compliance is NOT required
- JLPAA shall consult with legal counsel to determine how to respond

E. Student Access and Parental Notification

29. JLPAA personnel must receive consent from a student’s parent or guardian before allowing any officer to interview or search a student for immigration enforcement purposes, unless the officer presents a valid judicial warrant or court order.

30. JLPAA shall immediately notify parents or guardians if an officer requests or gains access to a student for immigration enforcement purposes, unless restricted by a judicial warrant or court order.

VII. NOTIFICATION REQUIREMENTS

A. Notification When Immigration Enforcement is Confirmed On-Site

When the presence of immigration enforcement is confirmed on a JLPAA school site, the Principal or designee shall immediately notify:

- All teachers, staff, and other school personnel on the school site
- Parents and guardians of all students

The notification shall include:

- Date and time immigration enforcement was confirmed
- Location of confirmed immigration enforcement
- Hyperlink to additional resources, including JLPAA’s immigration policies

B. Reporting to Governing Board

31. The Principal shall submit a timely report to the JLPAA governing board regarding any requests for information or access to a school site by an officer conducting immigration enforcement.

32. All reports shall be handled in a manner that ensures confidentiality and privacy of any potentially identifying information.

C. Reporting to California Department of Justice

33. JLPAA shall email the Bureau of Children's Justice at the California Department of Justice (BCJ@doj.ca.gov) regarding any attempt by an officer to access a school site or student for immigration enforcement purposes.

VIII. FAMILY PREPAREDNESS AND EMERGENCY CONTACTS

A. Family Safety Plans

34. JLPAA shall encourage families to develop Family Safety Plans that identify a trusted adult who can care for the student if no parent or guardian is available.

35. JLPAA shall provide information to families about completing a Caregiver's Authorization Affidavit or Petition for Appointment of Temporary Guardian, which would give a trusted adult authority to make educational and medical decisions for the student.

B. Emergency Contact Information

36. JLPAA shall permit students and families to update emergency contact information as needed throughout the school year.

37. Families may include a trusted adult guardian as a secondary emergency contact.

38. Emergency contact information will only be used for specified emergency situations and not for any other purpose.

C. Response to Parent/Guardian Detention or Deportation

39. If a student's parent or guardian has been detained or deported, JLPAA shall use the student's emergency contact information and release the student to designated emergency contacts.

40. JLPAA shall release the student to any individual who presents a valid Caregiver's Authorization Affidavit.

41. JLPAA shall only contact child protective services if unsuccessful in arranging timely care through emergency contacts or other instructions from the parent or guardian.

IX. PROTECTION FROM DISCRIMINATION, HARASSMENT, AND BULLYING

A. Anti-Discrimination Policy

42. JLPAA prohibits discrimination, harassment, intimidation, and bullying on the basis of a student's actual or perceived nationality, ethnicity, immigration status, race, color, religion, disability, gender, gender identity, gender expression, sexual orientation, or association with persons with these characteristics. (Education Code Sections 200, 220, 234.1)

B. Complaint Process

JLPAA shall maintain a complaint process that includes:

- A requirement that school personnel take immediate steps to intervene when they witness discrimination, harassment, intimidation, or bullying, when safe to do so
- A timeline to investigate and resolve complaints
- An appeal process for complainants who disagree with complaint resolution
- Confidentiality safeguards for immigration status information

C. Education and Training

43. JLPAA shall educate students about the negative impact of bullying based on actual or perceived immigration status or religious beliefs.

44. JLPAA shall train teachers, staff, and personnel to recognize signs of harassment and take corrective action, including reporting incidents to appropriate authorities.

X. ANNUAL NOTIFICATION TO FAMILIES

At the beginning of each school year, JLPAA shall provide all families with written notice that includes (Education Code Sections 234.7(d), 234.7(e), 48980, and 48985 for language requirements):

- Assurance that JLPAA will not release information to third parties for immigration enforcement purposes, except as required by law or court order

- A description of student privacy rights under FERPA and California law
- Information about the right to a free public education regardless of immigration status
- The “Know Your Educational Rights” guide published by the California Attorney General
- Information about anti-discrimination, anti-harassment, and anti-bullying policies and complaint procedures
- Resources for family preparedness, including information about Caregiver’s Authorization Affidavits and emergency contacts

All notifications shall be provided in the primary languages spoken by families if at least 15 percent of students enrolled speak a single primary language other than English.

XI. STAFF TRAINING AND PROFESSIONAL DEVELOPMENT

45. JLPAA shall provide annual training to all staff, including teachers, administrators, and support personnel, on the following:

- This immigration enforcement protection policy and procedures
- Identifying different types of warrants and documentation
- Proper response protocols when immigration officers arrive on campus
- Confidentiality requirements under FERPA and California law
- Notification procedures
- Anti-discrimination, anti-harassment, and anti-bullying responsibilities
- Cultural sensitivity and supporting immigrant families

46. Training materials shall be updated annually or as needed to reflect changes in law or policy.

47. JLPAA shall maintain records of all staff training conducted.

XII. DESIGNATED CONTACTS AND ROLES

Primary Contact for Immigration Enforcement Matters:

• **Principal:**

- Rachel Thomas
- rthomas@jlpaaschool.org

Legal Counsel Contact:

Young, Minney, and Corr (YM&C)

Mariam Babayan

500 Ygnacio Valley Road, Suite 1980

Walnut Creek, CA. 94596

Phone: 916-646-1400 | Fax: 916-646-1300

mbabayan@mycharterlaw.com

After-Hours Emergency Contact:

- Koko Judge
- 951-595-4500

24-Hour Contact Number:

- 951-595-4500

XIII. POLICY REVIEW AND UPDATES

48. This policy shall be reviewed and updated annually, or as needed to maintain compliance with state and federal law.

49. JLPAA shall update this policy within the school year following any updates to the California Attorney General's model policies.

50. A copy of this policy shall be maintained and made available to the California Department of Education upon request.

XIV. ADDITIONAL RESOURCES

For additional information and support, families may contact:

- California Department of Education: www.cde.ca.gov/ls/pf/if/
- California Attorney General's Office: oag.ca.gov
- ICE Detainee Locator: locator.ice.gov/odls
- State Bar of California (attorney verification): www.calbar.ca.gov/Attorneys
- California Self-Help Centers: www.courts.ca.gov/selfhelp-selfhelpcenters.htm

XV. CERTIFICATION OF POLICY ADOPTION

This Immigration Enforcement Protection Policy was adopted by the governing board of Julia Lee Performing Arts Academy in compliance with Education Code Section 234.7, as amended by AB 49, SB 98, and AB 495, and the California Attorney General's model policies dated December 2025.