



Campus Administrative Policy

Policy Title: **Campus Response to Law Enforcement Requests for Information for Immigration Purposes**

Policy Number: 3089A Functional Area: General Administration

Effective: September 1, 2025

Approved by: Terri C. Carrothers
Executive Vice Chancellor for Administration and Finance

Applies to: CU Anschutz

A. Introduction

Pursuant to § [24-74.1-102, C.R.S.](#) the University of Colorado Anschutz Medical Campus (“CU Anschutz”) shall “adopt and implement a policy for employees and a policy for children, students, patients, patrons, parents, guardians, relatives, and the general public, or amend an existing policy, that aligns with the requirements” of § 24-74.1-102, C.R.S.

B. Policy Statement

1. It is the [policy](#) of CU Anschutz not to collect the following information, except as required by federal or state law and as necessary to perform its duties, or to verify a person’s eligibility for a government-funded program if verification is a necessary condition of government funding or participation:
 - (a) Place of birth;
 - (b) Immigration or citizenship status; or

- (c) Information from passports, permanent resident cards, alien registration cards, or employment authorization documents.
- 2. Notwithstanding the above, CU Anschutz may release a record with the above-listed categories of information if pursuant to:
 - (a) A valid subpoena, order, or warrant issued by a federal judge or federal magistrate; or
 - (b) The written consent of the student or the student's parent or guardian as the result of a valid release of information from the student or the student's parent or guardian.

C. Protection and Disclosure of Personally Identifiable Information about Students and Employees

- 1. The [Family Education Rights and Privacy Act \(FERPA\)](#) protects the confidentiality of certain information the University has about students or about students' parents or guardians if that information is part of a student's educational record. For further information about what information CU Anschutz treats as confidential pursuant to FERPA, see <https://www.cuanschutz.edu/registrar/student-resources/ferpa>
- 2. The University also treats the personal information of its faculty and staff as confidential except in limited circumstances and as required by law.
- 3. All CU Anschutz employees are required to maintain the confidentiality of certain records for students, staff and faculty. The University is not obligated to comply with requests for student or employee records without a subpoena or warrant. Under FERPA, a valid subpoena, warrant, or court order is required for nonconsensual access to student records. Various legal frameworks also protect most employee records such as personnel documents and files.
- 4. Information relating to parents, guardians, or other relatives of a student that we obtain from the student are considered part of the student's educational record and is protected in the same manner as information about the student pursuant to FERPA. However, in accordance with an exception to FERPA regarding required disclosure in response to a lawful court order, such information is also subject to

disclosure if a valid subpoena, warrant or court order is presented to the University by a law enforcement officer.

5. Information relating to parents, guardians, or other relatives of employees that is provided by an employee is considered part of that employee's personnel record and is considered confidential. Information will only be released if a valid subpoena, warrant or court order is presented by a law enforcement officer or subject to written consent from the employee.
6. International students and scholars may be affected differently. Requests for student information, including requests made by government agents, are generally subject to the [Family Education Rights and Privacy Act \(FERPA\)](#), which limits the University's ability to release such information except in certain circumstances.
7. Department of Homeland Security (DHS) regulations explicitly state that specific information about students in F-1 status and F-2 dependents must be provided to DHS representatives upon request. Similar U.S. Department of State regulations govern J-1 exchange visitors and J-2 dependents. FERPA does not apply to disclosures in this context. If a federal government official requests that a CU Anschutz employee provide information regarding an international student, employee, or visitor who is sponsored for a visa by the university, those requests should be referred to the [Office of International Student and Scholar Services](#).

D. Procedure for Providing Access to Non-Public Facilities

1. CU Anschutz is a public institution, and the outdoor spaces on campus are open to the public. Access to buildings on campus is generally restricted to those with a university-issued ID.
2. Law enforcement officers may enter areas open to the public. To enter areas that are not open to the public (i.e. buildings with restricted access), law enforcement officers are required to present a judicial warrant — a criminal arrest or search warrant signed by a judge.
3. If a law enforcement officer requests access to a space with restricted access, a student or employee should **call the CU Anschutz Police Department at 303-724-444** and ask for assistance.

E. Responsible Employees

1. CU Anschutz designates the following responsible employees to be notified if information or access is requested for federal immigration enforcement purposes:
 - (a) University Registrar;
 - (b) Chief Human Resources Officer;
 - (c) Director, International Student and Scholar Services;
 - (d) CU Anschutz Chief of Police; and
 - (e) Senior Managing Associate University Counsel.
2. CU Anschutz shall request and document the following information from the federal immigration enforcement authority requesting federal immigration information:
 - (a) The first and last name, employer, and badge number of the person leading the federal immigration enforcement; and
 - (b) A copy of the subpoena, warrant, or order issued by a federal judge or federal magistrate to allow access.
3. As appropriate and in compliance with applicable law, CU Anschutz shall promptly share information about a federal immigration authority's request for information or access to the student or employee who was the subject of the request, or to the parent, guardian, or relative of the student or employee.

Notes

1. History
 - Adopted September 1, 2025
2. Cross References/Appendix
 - [§ 24-74.1-102, C.R.S.](#)
 - [Campus Administrative Policy 3008: Online Privacy Policy](#)
3. Responsible Office
 - Office Executive Vice Chancellor for Administration and Finance
 - Reviewing Offices include: Office of the Executive Vice Chancellor for Academic and Student Affairs, CU Anschutz Police Department, University Counsel, Office of International Student and Scholar Services, Registrar's Office, Office of Human Resources