



Policy Guiding TCA's Response to Requests for Information and Access for Immigration Enforcement Purposes

February 24, 2026

The Classical Academies is committed to safeguarding the rights, privacy, and well-being of all students and families to ensure our campuses remain welcoming, secure, and free from discrimination. This policy expands on, and enhances, TCA's existing Comprehensive School Safety Plan and will be incorporated therein. This policy also serves to satisfy requirements contained in AB 49, SB 98 and AB 495, effective January 1, 2026.

California law guarantees every child - regardless of immigration status, nationality, or family circumstances - the right to a free, safe, and welcoming public education. Our school follows all legal requirements, ensuring that, along with other supports and protections:

- Students and families are protected from unlawful immigration enforcement on campus
- Personal information is kept confidential, including the education records, home addresses, and travel schedules of any pupil, their family, or school employees. Such information shall not be disclosed to immigration authorities without a valid judicial warrant, subpoena, or written parental consent
- Employees are trained on how to respond to requests for access or information, and
- Schools remain safe havens for learning

Access to Documents or Information

TCA will refrain from disclosing or providing, in writing, verbally, or in any other manner, and to the extent practicable, any information about a student, including their education records, or information about the student's family and household to an officer or employee of an agency conducting immigration enforcement, unless that officer or employee provides a valid judicial warrant, judicial subpoena, or court order requesting the information. This prohibition applies as well to any information about a school employee.

This includes "personal information," as defined by Civil Code section 1798.3. "Personal information" means "any information that is maintained by an agency that identifies or describes an individual, including, but not limited to, the individual's name, social security number, physical description, home address, home telephone number, education, financial matters, and medical or employment history. It includes statements made by, or attributed to, the individual." This includes information about a student's home and travel schedule.

Collection and Retention of Student Information

TCA Administration will maintain in writing The Classical Academies' policies and procedures for gathering and handling sensitive student information, and appropriate personnel will receive training regarding those policies and procedures.

If TCA possesses information that could indicate immigration status, citizenship status, or national origin information, TCA will not use the acquired information to discriminate against any students or families or bar children from enrolling in or attending school.

If parents or guardians choose not to provide information that could indicate their or their child's immigration status, citizenship status, or national origin information, TCA will not use such actions as a basis to discriminate against any students or families or bar that child from enrolling in or attending school.

TCA will not allow school resources or data to be used to create a registry based on race, gender, sexual orientation, religion, ethnicity, national origin, or immigration status.

Inquiries Regarding Immigration Status, Citizenship Status, and National Origin Information

TCA personnel will not inquire specifically about a student's citizenship or immigration status or the citizenship or immigration status of a student's parents or guardians; nor shall personnel seek or require, to the exclusion of other permissible documentation or information, documentation or information that may indicate a student's immigration status, such as a green card, voter registration, a passport, or citizenship papers.

Where any law contemplates submission of national origin-related information to satisfy the requirements of a special program, TCA personnel will solicit that documentation or information separately from the school enrollment process.

Where permitted by law, TCA will enumerate alternative means to establish residency, age, or other eligibility criteria for enrollment or programs, and those alternative means will include among them documentation or information that are available to persons regardless of immigration status, citizenship status, or national origin, and that do not reveal information related to citizenship or immigration status.

Where residency, age, and other eligibility criteria for purposes of enrollment or any program may be established by alternative documents or information permitted by law or this policy, TCA procedures and forms will describe to the applicant, and accommodate, all alternatives specified in law and all alternatives authorized under this policy.

Inquiries About Social Security Numbers or Cards

TCA will not solicit or collect entire Social Security numbers or cards. TCA may solicit and collect the last four digits of an adult household member's Social Security number only if required to establish eligibility for federal benefit programs.

When collecting the last four digits of an adult household member's Social Security number to establish eligibility for a federal benefit program, TCA will explain the limited purpose for which this information is collected and clarify that a failure to provide this information will not bar the student from enrolling in or attending the school.

TCA will treat all students equitably in the receipt of all school services, including, but not limited to, the gathering of student and family information for the free and reduced lunch program, transportation, and educational instruction.

Information Sharing

TCA will avoid the disclosure of information that might indicate a student's or family's citizenship or immigration status without first attempting to notify the parent or guardian in compliance with the Family Educational Rights and Privacy Act (FERPA).

TCA personnel will take the following action steps upon receiving an information request related to a student's or family's immigration or citizenship status:

1. Notify a designated TCA official about the information request
2. Provide students and families with appropriate notice and a description of the officer or employee's request
3. Document any verbal or written request for information by an officer or employee of an agency for immigration enforcement purposes, and
4. Unless prohibited, provide students and parents/guardians with any documents provided by the officer or employee seeking the information

Except for investigations of suspected child abuse, child neglect, or child dependency, or when the subpoena served on the local educational agency prohibits disclosure, TCA will provide parental or guardian notification of any court orders, warrants, or subpoenas before responding to such requests.

TCA will make every effort to receive written parental or guardian consent for release of student information, unless the information is for directory information only.

No information regarding students, their families, or employees will be disclosed, to the extent practicable, to an officer or employee of an agency conducting immigration enforcement

without a judicial subpoena, judicial warrant, or court order, and any disclosure must be in accordance with requirements set forth in Section 99.31(a)(9)(ii) of Title 34 of the Code of Federal Regulations, as amended from time to time.

TCA's request for written parental, guardian, or eligible student consent for release of student information must include the following information:

1. the signature and date of the parent, guardian, or eligible student providing consent;
2. a description of the records to be disclosed;
3. the reason for release of information;
4. the parties or class of parties receiving the information; and
5. if requested by the parents, guardians or eligible student, a copy of the records to be released. TCA will permanently keep the consent notice with the record file.

The parent, guardian, or eligible student is not required to sign the consent form. If the parent, guardian, or eligible student refuses to provide written consent for the release of student information that is not otherwise subject to release, TCA will not release the information. If the request seeks information regarding an employee of the local educational agency, the same procedures as above will be followed, except that human resources personnel should be consulted first.

For any requests for information, TCA is under no obligation to produce the records or information immediately. TCA may note any designated date for production of records, if one is indicated in the request, and convey that to a designated person at the agency. The agency should designate a contact person to whom such requests for information should be directed.

TCA may obtain the contact information of the person to whom a response to the request for information should be directed and forward such contact information to the person the agency has designated to receive such requests.

Annual Information Notice to Parents and Guardians

(i) General Information

TCA will provide an annual notice to parents and guardians of the school's general information policies that includes:

- Assurances that the TCA will not release information to third parties for immigration enforcement purposes, except as required by law or court order
- A description of the types of student records maintained by the TCA
- A list of the circumstances or conditions under which the TCA might release student information to outside people or entities

- A statement that, unless TCA is providing directory information or information permitted to be disclosed without parental consent under FERPA and the California Education Code, TCA will notify parents or guardians and eligible students - and receive their written consent - before it releases a student's personally identifiable information, and
- Even for those exceptions that permit the release of education records without parental consent, TCA is required to notify the student and their family unless an exception exists, and an explanation of the exceptions that do not require prior notification.

(ii) Directory Information Policy

If TCA decides to release directory information, TCA will provide an annual notice to parents and guardians, and eligible students in attendance, of the TCA directory information policy that includes:

- The categories of information that the TCA has classified as public directory information that may be disclosed without parental consent and which should only include the information specifically identified in Education Code section 49061, subdivision (c)
- A statement that directory information does not include citizenship status, immigration status, place of birth, or any other information indicating national origin (except where the TCA receives consent as required under state law)
- The recipients of the directory information
- A description of the parent's, guardian's, or eligible student's abilities to refuse release of the student's directory information, and how to refuse release
- The deadline in which the parent, guardian, or eligible student must notify the school in writing that they do not want the information designated as directory information

Immigration Enforcement Notification

In accordance with the SAFE Act (SB 98), TCA will immediately notify all students, parents, guardians, teachers, and school personnel upon confirmation that immigration enforcement authorities are present on any TCA campus.

This notification will include the date, time, and specific campus location of the activity, along with links to resources regarding educational rights and support services. No personally identifiable information regarding any student or employee will be included in this notice.

In the event of immigration enforcement coming onto any TCA campus, the following protocols will be followed:

- Front office administration or site security will notify the site Principal or Designee
- Front office administration or site security will follow protocols according to the Immigration Enforcement on School Campuses Policy
- Site Principal or Designee will send out a notice to the community utilizing the school's communications system that covers email, text, and voice call and can be translated to the families preferred language.

Access to Nonpublic Areas

Unless required by state or federal law, or required to administer a state or federally supported educational program, The Classical Academies (TCA) will not allow an officer or employee of an agency conducting immigration enforcement to enter a nonpublic area of a school site for any purpose, unless the person seeking entry presents a valid judicial warrant, judicial subpoena, or a court order.

School officials must, if possible, ask the person to provide valid identification and state the purpose of their visit before seeking to enter a nonpublic area of a school site.

Monitoring and Receiving Visitors onto Campus - Immigration Enforcement

All visitors to TCA school campuses must follow TCA's visitor policy. TCA's visitor policy aims to avoid classroom interruptions, and preserves the peaceful conduct of the school's activities, consistent with local circumstances and practices. This policy also ensures that TCA campuses are secure for students and school employees.

TCA personnel will report entry by immigration enforcement officers to any on-site school police, security officers, or other appropriate administrator as would be required for any unexpected or unscheduled outside visitor coming on campus.

If there are no exigent circumstances necessitating immediate action, and if the immigration officer does not possess a judicial warrant or court order that provides a basis for the visit, the officer must provide, to the extent practicable, the following information to the Principal or Designee:

- Name, address, occupation;
- Age, if less than 21;
- Purpose in entering school grounds;
- Proof of identity; and
- Any other information as required by law.

No outsider - which would include immigration enforcement officers - will enter or remain on school grounds of TCA during school hours without having registered with the Principal or Designee.

Responding to On-Campus Immigration Enforcement

As early as possible, TCA personnel will notify the Principal or Designee of any request by any officer seeking access to the school site or any student to conduct immigration enforcement, or any requests for review of school documents (including for the service of lawful subpoenas, petitions, complaints, warrants, etc.).

In addition to notifying the Principal or Designee, TCA personnel will take the following action steps in response to an officer present on the school campus specifically for immigration enforcement purposes:

1. Advise the officer that before proceeding with their request, and absent exigent circumstances, school personnel must first receive notification and direction from the Principal or designee.
2. Ask to see, and make a copy of or note, the officer's credentials (name and badge number) and phone number of the officer's supervisor.
3. Ask the officer for their reason for being on school grounds and document it.
4. Ask the officer to produce any documentation that authorizes school access.
5. Make a copy of all documents provided by the officer. Retain one copy of the documents for school records.
6. If the officer declares that exigent circumstances exist and demands immediate access to the campus, TCA personnel should comply with the officer's orders and immediately contact the Principal or Designee.
7. If the officer does not declare that exigent circumstances exist, respond according to the requirements of the officer's documentation.

If the officer has:

- a. **an ICE (Immigrations and Customs Enforcement) administrative warrant**, TCA personnel will inform the officer that they cannot consent to any request without first consulting with the TCA's counsel or other designated agency official.

- b. **a federal judicial warrant** , prompt compliance with such a warrant is usually legally required. TCA personnel will consult with TCA’s counsel or other designated agency official before providing for access as outlined in the warrant.
 - c. **a subpoena for production of documents or other evidence**, immediate compliance is not required. Therefore, TCA personnel will inform TCA’s legal counsel or other designated official of the subpoena, and await further instructions on how to proceed.
8. While TCA personnel should not consent to an officer seeking access for immigration enforcement purposes, except as described above, they should not attempt to physically impede the officer, even if the officer appears to be exceeding the authorization given under a warrant or other document. If an officer attempts to enter, or enters the premises without consent, TCA personnel will document their actions while on campus and if feasible, accompany them at all times.
9. After the encounter with the officer, TCA personnel will promptly take written notes of all interactions with the officer. The notes will include the following items:
- a. List or copy of the officer’s credentials and contact information;
 - b. Identity of all school personnel who communicated with the officer;
 - c. Details of the officer’s request;
 - d. Whether the officer presented a warrant or subpoena to accompany their request, what was requested in the warrant/subpoena, and whether the warrant/subpoena was signed by a judge;
 - e. TCA’s personnel’s response to the officer’s request;
 - f. Any further action taken by the agent; and
 - g. Photo or copy of any documents presented by the agent.
10. TCA personnel will provide a copy of those notes, and associated documents collected from the officer, to the TCA’s legal counsel or other designated agency official.
11. In turn, TCA’s legal counsel or other designated official will submit a timely report to TCA’s governing board regarding the officer’s requests and actions and TCA’s response(s).

12. E-mail the Bureau of Children’s Justice in the California Department of Justice, at BCJ@doj.ca.gov, regarding any attempt by an officer or employee of an agency to access a school site or a student for immigration enforcement purposes.
13. The CEO or Designee shall report any requests for information or access by immigration authorities to the Board of Directors in a timely and confidential manner.

Parental Notification of Immigration Enforcement Actions

TCA personnel must receive consent from the student’s parent or guardian before a student can be interviewed or searched by any officer seeking to enforce the civil immigration laws at the school, unless the officer presents a valid, effective warrant signed by a judge, or presents a valid, effective court order.

TCA personnel will immediately notify the student’s parents or guardians if an officer or employee of an agency requests or gains access to a student for immigration enforcement purposes, unless such access was in compliance with a judicial warrant or subpoena that restricts the disclosure of the information to the parent or guardian.

Responding to the Detention or Deportation of a Student’s Family Member

TCA will encourage families and students to have and know their emergency phone numbers and to know where to find important documentation, including birth certificates, passports, Social Security cards, doctors’ contact information, medication lists, lists of allergies, etc., which will allow them to be prepared in the event that a family member is detained or deported.

TCA will permit students and families to update students’ emergency contact information as needed throughout the school year, and to provide alternative contacts if no parent or guardian is available.

TCA will ensure that families may include the information of an identified trusted adult guardian as a secondary emergency contact in case a student’s parent or guardian is detained.

TCA will communicate to families that information provided within the emergency cards will only be used in response to specified emergency situations, and not for any other purpose.

In the event a student’s parent or guardian has been detained or deported by federal immigration authorities, TCA will use the student’s emergency card contact information and release the student to the person(s) designated as emergency contacts. Alternatively, TCA will release the student into the custody of any individual who presents a Caregiver’s Authorization Affidavit on behalf of the student. TCA will only contact a child protective services agency if TCA personnel are unsuccessful in arranging for the timely care of the child through the emergency contact information that the school has, a Caregiver’s Authorization Affidavit, or other information or instructions conveyed by the parent or guardian.

Responding to Hate Crimes and Bullying: National Origin or Ethnicity, Including Immigration Status

TCA has adopted and publicized policies that prohibit discrimination, harassment, intimidation, and bullying on the basis of a student's actual or perceived nationality, ethnicity, or immigration status.

TCA will notify parents and guardians of their child's right to a free public education, regardless of immigration status or religious beliefs. This includes information related to the "Know Your Educational Rights" guide established by the Attorney General. TCA will inform students who are victims of hate crimes of their right to report such crimes.

Processing Complaints of Harassment and Bullying : National Origin or Ethnicity, Including Immigration Status

TCA has adopted a process for receiving and investigating complaints of discrimination, harassment, intimidation, and bullying based on any of the following actual or perceived characteristics: disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, association with a person or group with one or more of the aforementioned characteristics, immigration status. This policy reaffirms current practice and process, including for discrimination, harassment, intimidation and bullying based on actual or perceived national origin, ethnicity or immigration status.

The Harassment, Discrimination, Intimidation, and Bullying Policy, along with the complaint process located on TCA's website, include, but are not limited to, the following steps:

1. A requirement that, if school personnel witness an act of discrimination, harassment, intimidation, or bullying, they will take immediate steps to intervene when safe to do so;
2. A timeline to investigate and resolve complaints of discrimination, harassment, intimidation, or bullying that will be followed by all schools under the jurisdiction of the local educational agency; and
3. An appeal process afforded to the complainant should they disagree with the resolution of a complaint.
4. A requirement that TCA will ensure that complaint procedures contain confidentiality safeguards for immigration status information.
5. A requirement that TCA prohibits retaliation against a person who submits a complaint of discrimination, harassment, intimidation, or bullying.

Training Students and Employees on Anti-Bullying and Anti-Harassment : National Origin or Ethnicity, Including Immigration Status

TCA will educate students about the negative impact of bullying other students based on their actual or perceived immigration status or their religious beliefs or customs.

TCA will also train employees to ensure that they are aware of their legal duty to take reasonable steps to eliminate a hostile environment and respond to any incidents of harassment based on the actual or perceived characteristics noted above.

Training will, at minimum, provide agency personnel with the skills to do the following:

- Identify the signs of bullying or harassing behavior;
- Take immediate corrective action when bullying is observed; and
- Report incidents to the appropriate authorities, including law enforcement in instances of criminal behavior.