

PHOENIX CHARTER ACADEMY COLLEGE VIEW

Policy Regarding Protection of Immigrant Students and Procedures Regarding Immigration Enforcement

POLICY STATEMENT

Phoenix Charter Academy College View (“PCACV” or “the School”) is committed to providing a safe, secure, and peaceful learning environment for all students and staff. This policy has been adopted pursuant to California Education Code Section 234.7 and is based on the Policies published by the California Attorney General in December 2025.

This policy addresses: (1) gathering and handling student and family information; (2) sharing information regarding students, families, and employees; (3) responding to requests for access to school sites and students; (4) responding to the detention or deportation of a student's family member; and (5) responding to hate crimes and bullying based on immigration status.

Legal Authority

This policy is adopted pursuant to:

- Education Code Section 234.7 (as amended by AB 49 and AB 495)
 - Education Code Section 32282 (as amended by SB 98)
- Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g

Applicability for Classroom-Based Charter School with Physical Campus

PCACV operates as a classroom-based charter school with a physical campus, offering both a seat-based program and traditional independent study options. In that context, this policy applies to all School operations, including:

- School campus and all physical facilities operated by PCACV
- All classrooms, hallways, administrative offices, and other interior school buildings
- Gated playgrounds, athletic fields, and recreational areas
- Parking lots that are fenced and require authorization to enter
- School-provided transportation and buses
- School-sponsored activities, whether on or off campus
- Seat-based program
- Traditional independent study program

For purposes of this policy, “schoolsite,” “campus,” and “school grounds” includes the physical campus and facilities operated by PCACV, as well as any location where School-sponsored

activities are occurring, including off-campus field trips, athletic events, schoolbus, and school-provided transportation.

Nonpublic Areas: For a classroom-based school with physical facilities, “nonpublic areas” include interior school buildings (classrooms, hallways, stairwells, administrative offices), gated playgrounds and athletic fields, parking lots that are completely fenced and require authorization to enter, school buses and other student transportation vehicles, cafeterias and multipurpose rooms, locker rooms and restrooms, and any area where a school-sponsored activity is occurring that requires authorization to access.

Responsible Administrator

The Chief Executive Officer is designated as the administrator responsible for overseeing implementation of this policy and serving as the primary contact for all matters related to immigration enforcement at PCACV.

Know Your Educational Rights Checklist

In accordance with Education Code Section 234.7(e)(1)(C), PCACV has adopted the "Know Your Educational Rights" guide provided by the California Attorney General (Appendix G of the December 2025 Policies). This guide is posted:

- At PCACV's administrative offices
- On the PCACV website
- In every language provided by the Attorney General

SECTION 1: GATHERING AND HANDLING STUDENT INFORMATION

1.1 Policies for Collecting and Retaining Student Information

The following policies are adopted from the California Attorney General's Policies (December 2025):

- The Chief Executive Officer shall maintain in writing PCACV policies and procedures for gathering and handling sensitive student information, and appropriate personnel shall receive training regarding those policies and procedures.
- If PCACV possesses information that could indicate immigration status, citizenship status, or national origin information, PCACV shall 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 children's immigration status, citizenship status, or national origin information, PCACV shall not use such actions as a basis to discriminate against any students or families or bar children from enrolling in or attending school.

- PCACV shall 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.

1.2 Policies for Inquiries Regarding Immigration Status, Citizenship Status, and National Origin Information

- PCACV 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; 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, PCACV personnel shall solicit that documentation or information separately from the school enrollment process.
- Where permitted by law, the Chief Executive Officer of PCACV shall enumerate alternative means to establish residency, age, or other eligibility criteria for enrollment or programs, and those alternative means shall 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. Local educational agencies should note the method of age verification but are not required to maintain a copy of the document used to show age.
- 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, PCACV's procedures and forms shall describe to the applicant, and accommodate, all alternatives specified in law and all alternatives authorized under this policy.

1.3 Policies for Inquiries About Social Security Numbers or Cards

- PCACV shall not solicit or collect entire Social Security numbers or cards.
- PCACV shall 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, PCACV shall 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.
- PCACV shall 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.

SECTION 2: SHARING INFORMATION REGARDING STUDENTS, FAMILIES, AND EMPLOYEES

2.1 Policies and Procedures Regarding Information Sharing

The following policies are adopted from the California Attorney General's Policies (December 2025):

- PCACV shall 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).
- PCACV personnel shall take the following action steps upon receiving an information request related to a student's or family's immigration or citizenship status:
 - Notify a designated PCACV official about the information request.
 - Provide students and families with appropriate notice and a description of the officer or employee's request.
 - Document any verbal or written request for information by an officer or employee of an agency for immigration enforcement purposes.
 - 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 PCACV prohibits disclosure, PCACV shall provide parental or guardian notification of any court orders, warrants, or subpoenas before responding to such requests.
- PCACV shall make every effort to receive written parental or guardian consent for release of student information, unless the information is for directory information only.
- PCACV should make a photocopy of the request and immediately consult legal counsel and/or a designated representative of the agency. No information regarding students, their families, teachers, or employees shall 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. If faced with an administrative subpoena, consult legal counsel to determine how or whether to respond as there is no separate requirement in federal or state law to provide information to the Department of Homeland Security (DHS), ICE, or any other agency within DHS, without a court order, judicial warrant, or judicial subpoena.
- PCACV'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. PCACV shall 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, PCACV shall not release the information.
- If the request seeks information regarding an employee or teacher of PCACV, the same procedures as above should be followed, except that human resources personnel (a designated person) should be consulted first.
- For any requests for information, PCACV is under no obligation to produce the records or information immediately. Rather, PCACV should 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.
- PCACV should 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 PCACV has designated to receive such requests.

2.2 Policies for Annual Information Notice to Parents and Guardians

2.2.1 General Information Policy

- PCACV shall provide an annual notice to parents and guardians of the school's general information policies that includes:
 - Assurances that PCACV 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 PCACV.
 - A list of the circumstances or conditions under which PCACV might release student information to outside people or entities.
 - A statement that, unless PCACV is providing directory information or information permitted to be disclosed without parental consent under FERPA and the California Education Code, PCACV shall notify parents or guardians and eligible students—and receive their written consent—before it releases a student's personally identifiable information.
 - Even for those exceptions that permit the release of education records without parental consent, the agency is required to notify the student and their family unless an exception exists. The agency's policy should explain these exceptions that do not require prior notification.

2.2.2 Directory Information Policy

- If PCACV decides to release directory information, PCACV shall provide an annual notice to parents and guardians, and eligible students in attendance, of PCACV's directory information policy that includes:
 - The categories of information that PCACV 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 PCACV 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.

SECTION 3: RESPONDING TO REQUESTS FOR ACCESS TO SCHOOL SITES

3.1 Policies for Monitoring and Receiving Visitors onto Campus

The following policies are adopted from the California Attorney General's Policies (December 2025):

- No outsider—which would include immigration enforcement officers—shall enter or remain on school grounds of PCACV during school hours without having registered with the Chief Executive Officer or designee. 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 Chief Executive Officer 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.
- PCACV shall adopt measures for responding to outsiders that avoids classroom interruptions, and preserves the peaceful conduct of the school's activities, consistent with local circumstances and practices.

- PCACV shall post signs at the entrance of its school grounds to notify outsiders of the hours and requirements for registration.
- PCACV personnel shall 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.

3.2 Policies for Responding to Immigration Enforcement

- As early as possible, PCACV personnel shall notify the Chief Executive Officer of any request by any officer seeking access to the schoolsite 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 Chief Executive Officer, PCACV personnel shall 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 Chief Executive Officer.
 2. Ask to see, and make a copy of or note, the officer's credentials (name and badge number). Also ask for and copy or note the 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, PCACV personnel should comply with the officer's orders and immediately contact the Chief Executive Officer.
 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:
 - an ICE (Immigrations and Customs Enforcement) administrative warrant, PCACV personnel shall inform the officer that they cannot consent to any request without first consulting with PCACV's counsel or other designated agency official.
 - a federal judicial warrant (search-and-seizure warrant or arrest warrant), prompt compliance with such a warrant is usually legally required. If feasible, consult with PCACV's legal counsel or Chief Executive Officer before providing the agent access to the person or materials specified in the warrant.
 - a subpoena for production of documents or other evidence, immediate compliance is not required. Therefore, PCACV personnel shall inform PCACV's legal counsel

or other designated official of the subpoena, and await further instructions on how to proceed.

8. While PCACV 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 enters the premises without consent, PCACV personnel shall document their actions while on campus and if feasible, accompany them at all times.
9. After the encounter with the officer, PCACV personnel shall promptly take written notes of all interactions with the officer. The notes shall include the following items:
 - List or copy of the officer's credentials and contact information;
 - Identity of all school personnel who communicated with the officer;
 - Details of the officer's request;
 - 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;
 - PCACV personnel's response to the officer's request;
 - Any further action taken by the agent; and
 - Photo or copy of any documents presented by the agent.
10. PCACV personnel shall provide a copy of those notes, and associated documents collected from the officer, to PCACV's legal counsel or other designated agency official.
11. In turn, PCACV's legal counsel or other designated official shall submit a timely report to PCACV's governing board regarding the officer's requests and actions and PCACV'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 schoolsite or a student for immigration enforcement purposes.

3.3 Policies for Parental Notification of Immigration Enforcement Actions

- PCACV 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.
- PCACV personnel shall 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.

SECTION 4: RESPONDING TO DETENTION OR DEPORTATION OF FAMILY MEMBER

4.1 Policies for Responding to the Detention or Deportation of a Student's Family Member

The following policies are adopted from the California Attorney General's Policies (December 2025):

- PCACV shall 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.
- PCACV shall permit students and families to update students' emergency contact information as needed throughout the school year, and provide alternative contacts if no parent or guardian is available.
- PCACV shall 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.
- PCACV shall 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/guardian has been detained or deported by federal immigration authorities, PCACV shall use the student's emergency card contact information and release the student to the person(s) designated as emergency contacts. Alternatively, PCACV shall release the student into the custody of any individual who presents a Caregiver's Authorization Affidavit on behalf of the student. PCACV shall only contact a child protective services agency if PCACV 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.

SECTION 5: RESPONDING TO HATE CRIMES AND BULLYING

5.1 Policies: Adopting and Publicizing Anti-Bullying and Anti-Harassment Policy

The following policies are adopted from the California Attorney General's Policies (December 2025):

- PCACV shall adopt and publicize policies that prohibit discrimination, harassment, intimidation, and bullying on the basis of a student's actual or perceived nationality, ethnicity, or immigration status. Those policies must be translated in the student's primary language if at least 15 percent of the students enrolled in the school speak a single primary language other than English.

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

5.2 Policies: Processing Complaints of Harassment and Bullying

- PCACV shall adopt a process for receiving complaints of 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
- The complaint process must include, but is not limited to, the following steps:
 - A requirement that, if school personnel witness an act of discrimination, harassment, intimidation, or bullying, they shall take immediate steps to intervene when safe to do so;
 - A timeline to investigate and resolve complaints of discrimination, harassment, intimidation, or bullying that shall be followed by all schools under the jurisdiction of PCACV; and
 - An appeal process afforded to the complainant should they disagree with the resolution of a complaint.
- PCACV shall ensure that complaint procedures contain confidentiality safeguards for immigration status information.
- PCACV shall prohibit retaliation against a person who submits a complaint of discrimination, harassment, intimidation, or bullying.

5.3 Policies: Training Students, Teachers, and Staff

- PCACV shall educate students about the negative impact of bullying other students based on their actual or perceived immigration status or their religious beliefs or customs.
- PCACV shall also train teachers, staff, and personnel 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. Such training should, at minimum, provide agency personnel with the skills to do the following:
 - Discuss the varying immigration experiences among members of the student body and school community;
 - Discuss bullying-prevention strategies with students, and teach students to recognize the behavior and characteristics of bullying perpetrators and victims;
 - 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.

SECTION 6: ANNUAL NOTIFICATION AND REPORTING REQUIREMENTS

6.1 Annual Notification to Parents and Guardians

Pursuant to Education Code Section 234.7(e)(1)(A)(ii) and (B), PCACV shall provide annual notification to all parents and guardians regarding this policy and related rights. This notification shall be provided through PCACV's annual notification pursuant to Education Code Section 48980 or other cost-effective means determined by the School. The annual notification shall include the topics specified in Section 2.2 of this policy.

6.2 Governing Board Reporting

In accordance with Education Code Section 234.7(c) and the Policies in Section 3.2 above, PCACV's designated official shall submit a timely report to PCACV's governing board regarding any officer's requests for access or information and PCACV's response(s). All such reports shall ensure confidentiality and privacy of any potentially identifying information about students, families, or employees.

6.3 Immigration Enforcement Presence Notification (SB 98)

As required by California Education Code Section 32282 (as amended by SB 98), PCACV's Comprehensive School Safety Plan includes procedures specifically designed to notify parents and guardians of pupils, teachers, administrators, and school personnel when the School confirms the presence of immigration enforcement on the school site.

When Notification is Required: When PCACV confirms the presence of immigration enforcement officers on campus for immigration enforcement purposes, the School shall notify parents/guardians of all students, teachers, administrators, and all school personnel.

Notification Content: Notifications shall include the date and time of the confirmed presence, the general location on campus, and resources available to families (including links to PCACV’s immigration policy, “Know Your Educational Rights” guide, and counseling services). Notifications shall NOT include personally identifiable information about any student, family member, or staff member.

Notification Timing: PCACV maintains discretion in determining when to issue notifications, prioritizing the safety and well-being of students, employees, and community members. Factors to consider include whether students are still on campus, whether the incident is ongoing, and the time of day most likely to reach families effectively.

Notification Methods: PCACV shall use multiple methods to notify the school community, including email, school website postings, automated calls, text messages (if available), and letters as appropriate. Notifications shall be provided in English and Spanish at minimum, with additional languages as needed based on school demographics.

Effective Period: These SB 98 requirements are effective from September 20, 2025 through January 1, 2031 (sunset provision).

Annual Review: PCACV shall review and update these notification procedures annually as part of the Comprehensive School Safety Plan review process, by March 1 of each year.

SECTION 7: POLICY REVIEW AND UPDATES

This policy shall be reviewed annually and updated as necessary to reflect changes in federal or state law or California Attorney General guidance. The Chief Executive Officer shall be responsible for ensuring policy compliance and coordinating updates. Any updates to the California Attorney General's "Know Your Educational Rights" checklist shall be posted by the school year following such updates.