

# 10 Practices to Safeguard Undocumented Student Data in Higher Education

## Introduction

A second Trump administration has raised concerns about the safety of data shared and retained as part of the admissions and financial aid processes. Higher education institutions should remember that they don't have to create entirely new policies to protect student information. Instead, we can build on the strong foundations of existing practices and policies that have proven effective over time.

This resource focuses on practical steps institutions can take with and for undocumented students, to protect their data. These practices can help reduce harm to students and their families who may be concerned about their safety and future in higher education. Higher education practitioners and administrators will gain the tools to make informed decisions, review and fortify the available protections, and build an action plan.

*Based on your school environment, the following practices should be undertaken collaboratively by practitioners, administrators, legal counsel, and/or students.*

## Ten Practices to Protect Undocumented Student Data

1. Research and clarify the protections currently available through federal and state policies (see [FERPA Overview](#) & [Protecting the Data of Undocumented Students in California](#)).
2. Work with your School Board or Board of Trustees to pass, reaffirm, and/or implement clear procedures regarding engagement with ICE personnel and data inquiries. (See [Chicago Board of Education](#) & [Los Angeles School Board](#) resolutions).
3. Train or remind key personnel of their legal responsibilities to follow federal, state, institutional, local & district directives (See [Legal Advisory 24-11-15: California and its Community Colleges Remain Sanctuary](#)).
4. Create or update campus-wide protocols to ensure campus personnel are aware of and follow specific processes when responding to inquiries regarding student records based on immigration status. (See [Cerritos Community College protocol](#)).
5. Create or reinvigorate an active campus task force to effectively implement these recommendations. Be sure to include the voices and concerns of those who are directly impacted. (See [Developing a Strong Undocumented Student Task Force](#)).
6. Review current departmental and institutional practices of collecting/storing the data of undocumented students and other vulnerable populations (See [Students Want to Feel Safe, Safety Breeds Inclusivity](#)).



Build on existing policies from other states and campuses to legitimize and adapt as needed.



Key departments that could be involved include: IT, admissions, registrar, financial aid, and/or bursar/cashier.

Audit public-facing student documents (e.g., transcripts) to ensure that information such as country of birth and immigration status is not included.



7. Verify that any coding used to identify students' data is not easily identifiable or connected to their status.

8. Limit access to student data to a small, trusted group of staff or administrators who are specifically trained as "data custodians."

Don't share procedures for identifying vulnerable student populations with anyone outside of the designated "data custodians."

9. Remind all student service professionals and faculty to exercise extra precautions in their written and verbal communication, as well as student records, to avoid inadvertently disclosing a student's immigration status.



For example: financial aid, admissions, and academic counselors should not mention immigration status in student records because all counselors may have access to them.

Be aware of your volume and tone when communicating with undocumented students.

### Tips for Data Custodians

- Do not use a personal computer
- If remote, use a private network to download data
- Password protect the document
- Use a vague name to ensure the document is not connected to students' status
- Remove data and/or report once it is no longer needed

10. Send campus-wide emails affirming the rights of ALL students. The content of these emails should reflect your state and institution's specific's specific environment (see [UCLA CILP statement](#)).

We encourage institutions to use this resource to take immediate action in preparation for the incoming administration. Everyone has a role to play in making our campuses safer for undocumented students, their families, and our communities.

**For more resources go to [Rights & Responsibilities Hub: Guidance for Institutions and Immigrant Students](#).**

## Acknowledgments

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