



ARROWHEAD REGIONAL MEDICAL CENTER
Administrative Policies and Procedures

Policy No. 1000.44 Issue 1

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SECTION: COMPLIANCE

SUBSECTION: GENERAL

SUBJECT: COMPLIANCE PROGRAM – IMMIGRATION ENFORCEMENT

APPROVED BY:

ARMC Chief Executive Officer

I. Policy Summary

The California Values Act (the “Act”) requires that the California Attorney General “publish model policies limiting assistance with immigration enforcement to the fullest extent possible consistent with federal and state law” at various public institutions and facilities including “health facilities operated by a political subdivision of the state” (“Health Facilities”). The Act requires that Health Facilities adopt those model policies or equivalent policies.

To satisfy this mandate, on October 1, 2018, the California Attorney General’s Office published model policies for Health Facilities, entitled “Promoting Safe and Secure healthcare Access for All: Guidance and Model Policies to Assist California’s Healthcare Facilities in Responding to Immigration Issues.” The publication was updated by the California Attorney General’s Office in December 2024.

Arrowhead Regional Medical Center (“ARMC”) has chosen to adopt policies equivalent to the Attorney General’s model policies as set forth in this Policy as required under *Government Code* § 7284.8(a) and consistent with the requirements of Chapter 2, Division 20 of the Health & Safety Code.

II. Definitions

- A. Administrative Warrant/Subpoena:** Refers to a document issued by an immigration officer or immigration judge for the search of property or arrest of a person. These warrants/subpoenas do not authorize entry into non-public areas. They generally do not require immediate compliance.
- B. ARMC:** Refers to all facilities of Arrowhead Regional Medical Center, including, but not limited to, the main hospital, medical office building, family health centers, all clinics, all satellite offices, and the Behavioral Health building.
- C. ARMC Staff:** Refers to any employee, contracted staff, medical staff, and volunteers at ARMC.

- D. Designated Administrator:** Refers to the administrator at ARMC that serves as the point of contact for immigration officers and for all ARMC Staff relating to a response to immigration officers, as discuss in Section III(A) below. This individual must be part of ARMC's management/administration team.
- E. HIM:** Refers to ARMC's Health Information Management office.
- F. HIPAA:** Refers to the Health Insurance Portability and Accountability Act.
- G. Immigration enforcement:** Includes all conduct to investigate, enforce, or assist in the investigation or enforcement of any civil immigration law, and also includes any and all conduct to investigate, enforce, or assist in the investigation or enforcement of any criminal immigration law that penalizes a person's presence in, entry, or reentry to, or employment in, the United States.
- H. Immigration officers:** Refers to officers, agents, or employees of any federal immigration agency, including, but not limited to the US Immigration and Customs Enforcement and the US Customs and Border Protection agencies.
- I. Judicial warrant:** Refers to a type of document signed by a federal or state judge (not including an immigration judge) that authorizes the search of property or the arrest of a person. Prompt compliance is usually required.
- J. Non-Public Areas:** Refers to areas of ARMC that are generally not open to the public, including, but not limited to patient treatment areas, areas where protected health information is generally discussed, nursing stations, physician and staff offices, supply rooms, employee-only parking lots, employee break rooms, and conference rooms. ARMC is encouraged to designate such areas through mapping, signage, key entry, policy, or a combination of those.
- K. Patient:** Refers to any person who receives health care services as a patient of ARMC.

III. Policy

A. Designated Administrator for Immigration Issues

ARMC shall designate an administrator ("Designated Administrator") for each shift to serve as a point of contact for immigration officers and ARMC staff to handle inquiries or requests for information or access by immigration officers at ARMC. The Designated Administrator will ensure that ARMC staff are uniformly and appropriately dealing with immigration enforcement inquiries and requests for information relating to patients.

The designated administrator at ARMC is the House Supervisor and/or the Administrator on Call.

B. Responding to Requests for Patient Information from Immigration Officers

- a. ARMC staff shall disclose patient information to immigration officers only when required or expressly authorized to do so by applicable laws, consistent with this policy, and after obtaining the approval of the Designated Administrator.
- b. The Designated Administrator may consult County Counsel to help determine when and to what extent ARMC is required to comply with administrative requests involving patient information.
- c. When responding to requests from immigration officers for patient information or medical records (including through a lawfully issued subpoena, warrant, or court order), ARMC staff shall immediately inform and direct the request to the Designated Administrator, who must determine and document the following in the House Supervisor Report
 - Identity of the requestor and badge number;
 - The specific agency the requestor is from;
 - The specific types of information the requestor is seeking;
 - The reason the requestor wants the information;
 - The document(s) that support the requestor's request for information (such as a warrant, subpoena, etc.); and
 - Whether the document(s) that support the request is issued by a state/federal judge or an immigration officer/judge.

Additionally, to the extent any patient information is provided to immigration officers, the Designated Administrator shall notify HIM so that such disclosure can be logged in accordance with applicable state and federal laws.

- d. In the event that ARMC staff receive a telephone call requesting patient information for immigration enforcement purposes, ARMC staff shall obtain the caller's information, including the caller's name, badge number (if applicable), phone number, the caller's employer, information requested, purpose of the request, and request any documents from the caller supporting the request. ARMC staff shall inform the caller that the Designated Administrator will be informed of the request and will return the caller's call. ARMC staff shall then inform the Designated Administrator of the request.
- e. If ARMC is legally required to disclose patient information to immigration officers without the patient's authorization, the Designated Administrator or his/her designee must document the disclosure in compliance with ARMC's policies and procedures as required by HIPAA. The documentation must include information that supports the decision to disclose the information. Disclosures to immigration officers are subject to the accounting-of-disclosures requirement under HIPAA.

C. Responding to Immigration Officers' Physical Presence at ARMC.

- a. In the event that an immigration officer comes to ARMC for immigration enforcement purposes, the ARMC staff that first comes into contact with the officer must notify the Designated Administrator. The ARMC staff member shall advise the Designated

Administrator of any request by the immigration officer to access ARMC or a patient, or any request by the officer to review any ARMC documents. If the immigration officer indicates that he/she is seeking to conduct an I-9 inspection, the ARMC staff should inform the Designated Administrator of this.

- b. The ARMC staff that first comes into contact with the immigration officer shall advise the officer that before proceeding with the officer's request, the staff member must first notify and receive direction from the Designated Administrator. The ARMC staff member is not required to answer any questions posed by the officer. The ARMC staff member should direct him/her to speak to the Designated Administrator.
- c. ARMC staff shall not allow immigration officers to enter any non-public areas without a valid judicial warrant or court order that specifically grants access to the non-public area and without the approval of the Designated Administrator. In the event that immigration officers attempt to enter non-public areas, the staff member should advise the officer that ARMC is precluded by law from providing consent to the officer entering such areas of ARMC. The Designated Administrator shall document (1) the identity of the ARMC staff member who denied the consent to enter the non-public areas, and (2) the identity of another ARMC staff member who witnessed the first staff member denying consent to enter non-public areas of ARMC. However, under no circumstances shall ARMC staff engage in any physical conduct that restricts, interferes, or obstructs the officers. ARMC staff shall immediately inform the Designated Administrator in the event that immigration officers enter any non-public areas.
- d. The Designated Administrator should ask to see, and make a copy of or note, the officer's credentials (name and badge number or identification card) and ask for and copy or note the telephone number of the officer's supervisor.
- e. The Designated Administrator should ask the officer to explain the purpose of the visit and note the response.
- f. The Designated Administrator should ask the officer to produce any documentation that authorizes the officer's access.
- g. The Designated Administrator shall make copies of all documents provided by the officer.
- h. The Designated Administrator shall state that ARMC is precluded by law from providing consent to entry of any non-public areas of ARMC. The Designated Administrator shall not permit immigration officers to enter any non-public areas of ARMC, other than to take the immigration officer to a non-public area, where there are no employees, for the sole purpose of verifying if the officer has a judicial warrant.
- i. Without expressing consent, the Designated Administrator shall respond according to the requirements of the officer's documentation and consistent with all applicable

laws. For example, unless otherwise provided by laws applying to patient information at ARMC, if the officer has:

- *A US Immigration and Customs Enforcement administrative “warrant”*: Immediate compliance is not required. Inform the officer that ARMC cannot respond to the warrant until after it has been reviewed by legal counsel. Provide a copy of the warrant to County Counsel as soon as possible.
- *A subpoena* for production of documents or other evidence: Immediate compliance is not required. Inform the officer that the ARMC cannot respond to the subpoena until after it has been reviewed by the HIM office and legal counsel. Give a copy of the subpoena to HIM and County Counsel as soon as possible.
- *A federal judicial warrant* (either a search-and-seizure warrant or an arrest warrant): Prompt compliance usually is required, but the Designated Administrator may want to consult with County Counsel before responding.
- *A notice to appear*: This document is not directed at ARMC. ARMC staff are under no obligation to deliver or facilitate service of this document to the person named in the document. If a copy of the document is received, give it to County Counsel as soon as possible.
- A request to notify officers upon release of a patient: When no document is provided to support this request, compliance is not required.
- *Notice of Inspection of I-9’s*: This document does not require immediate compliance and must give ARMC at least three (3) business days to comply. Upon receipt of this document, the Designated Administrator must immediately inform the administrator to whom the individual reports and/or the respective vendor so that the Human Resources Department and/or the vendor can prepare for the inspection.

Samples of administrative warrants, judicial warrants, subpoenas, notices to appear, and notices of inspection can be found as exhibits to this Policy.

- j. The Designated Administrator must document in the House Supervisor’s Report the officer’s actions while at ARMC in as much detail as possible, but without interfering with the officer’s movements. If an officer enters any non-public areas despite being informed that ARMC does not consent to the entry, this should be documented. The Designated Administrator should also document (1) that he/she advised the officer that ARMC is precluded by law from providing consent to enter into non-public areas without a judicial warrant/order, and (2) the identity of another ARMC staff member that witnessed the denial of consent.
- k. The Designated Administrator should complete a Security Report that includes information gathered as described above and the officer’s statements and actions.

D. Information on Patient Rights and Responsibilities

- a. ARMC should post and issue general information policies telling patients of their privacy rights and remedies.
 - ARMC should give assurances that it will not release patient information to third parties for immigration enforcement purposes, except as required or expressly authorized by law or court order.
 - ARMC should provide a comprehensive list of privacy protections, under both federal law and California law (including a patient's right of action for disclosures in violation of the Confidentiality of Medical Information Act).
- b. ARMC should post information guides regarding immigration patient rights, including the right to remain silent. While immigration officers may not enter into non-public areas of the facility without a judicial warrant/order, they may enter public areas without a warrant and question any person present.

E. Monitoring and Receiving Visitors

- a. No visitor—including immigration officers—may enter or remain on any non-public areas of ARMC without having first registered with ARMC. If there are no exigent circumstances necessitating immediate action, and if the visitor does not possess a judicial warrant or court order that provides a basis for the visit, the visitor should provide the following information when registering to come onto ARMC's grounds:
 - Name and address
 - Purpose in entering the facility
 - Proof of identity

(Try to obtain this information even from a visitor or officer with a court order)
- b. ARMC shall post signs at the entrances to notify visitors of the hours of operation and requirements for registration.
- c. ARMC staff shall report entry by immigration officers to the Designated Administrator.

F. Parental Notification of Immigration Law Enforcement Actions

- a. ARMC must receive consent from a minor patient's parent or guardian (provided the child is not legally regarded as his or her own personal representative of his or her health information) before a minor patient can be interviewed or searched by any officer seeking to enforce civil immigration laws at ARMC, unless the officer presents a valid, effective warrant signed by a judge, or presents a valid, effective court order.
- b. ARMC shall immediately notify the minor patient's parent or guardian if an immigration officer requests or gains access to the patient 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.

G. ARMC Staff Education

ARMC shall ensure that all ARMC staff, including volunteers, are made aware of the requirements of this policy and understand how to respond to requests relating to immigration enforcement that grants access to ARMC or its patients.

IV. References

California Attorney General, Promoting Safe and Secure Healthcare Access for All: Guidance and Model Policies to Assist California's Healthcare Facilities in Responding to Immigration Issues (October 2018):

<https://oag.ca.gov/sites/all/files/agweb/pdfs/immigration/healthcare-guidance.pdf>

California Values Act, Cal. Gov. Code § 7284 et seq. (especially §§ 7284.4 & 7284.8):http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=7.&title=1.&part=&chapter=17.25.&article

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

United States of America
v.

Case No.

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

Date: Issuing officer's signature

City and state: Printed name and title

Return
This warrant was received on (date) and the person was arrested on (date) at (city and state).
Date: Arresting officer's signature
Printed name and title

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT
for the

Plaintiff
v.
Defendant
Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:
(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place: Date and Time:

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date:

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party), who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT 3: Sample Administrative Warrant

U.S. DEPARTMENT OF HOMELAND SECURITY	Warrant for Arrest of Alien
File No. _____	
Date: _____	
To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations	
I have determined that there is probable cause to believe that _____ is removable from the United States. This determination is based upon:	
<input type="checkbox"/> the execution of a charging document to initiate removal proceedings against the subject;	
<input type="checkbox"/> the pendency of ongoing removal proceedings against the subject;	
<input type="checkbox"/> the failure to establish admissibility subsequent to deferred inspection;	
<input type="checkbox"/> biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or	
<input type="checkbox"/> statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.	
YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.	
_____ (Signature of Authorized Immigration Officer)	
_____ (Printed Name and Title of Authorized Immigration Officer)	
Certificate of Service	
I hereby certify that the Warrant for Arrest of Alien was served by me at _____ (Location)	
on _____ (Name of Alien) on _____ (Date of Service), and the contents of this	
notice were read to him or her in the _____ (Language) language.	
_____ Name and Signature of Officer	_____ Name or Number of Interpreter (if applicable)
Form I-200 (Rev. 08/06)	

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement
WARRANT OF REMOVAL/DEPORTATION

File No: _____
Date: _____

To any immigration officer of the United States Department of Homeland Security:

_____ (Full name of alien)

who entered the United States at _____ on _____
(Place of entry) (Date of entry)

is subject to removal/deportation from the United States, based upon a final order by:

- an immigration judge in exclusion, deportation, or removal proceedings
- a designated official
- the Board of Immigration Appeals
- a United States District or Magistrate Court Judge

and pursuant to the following provisions of the Immigration and Nationality Act:

I, the undersigned officer of the United States, by virtue of the power and authority vested in the Secretary of Homeland Security under the laws of the United States and by his or her direction, command you to take into custody and remove from the United States the above-named alien, pursuant to law, at the expense of:

(Signature of immigration officer)

(Title of immigration officer)

(Date and office location)

EXHIBIT 4: Sample Administrative Subpoena

1. To (Name, Address, City, State, Zip Code)	DEPARTMENT OF HOMELAND SECURITY IMMIGRATION ENFORCEMENT SUBPOENA to Appear and/or Produce Records 8 U.S.C. § 1225(d), 8 C.F.R. § 287.4
Subpoena Number	
2. In Reference To	
_____ <small>(Title of Proceeding) (File Number, if Applicable)</small>	

By the service of this subpoena upon you, **YOU ARE HEREBY SUMMONED AND REQUIRED TO:**


(A) **APPEAR** before the U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), or U.S. Citizenship and Immigration Services (USCIS) Official named in Block 3 at the place, date, and time specified, to testify and give information relating to the matter indicated in Block 2.

(B) **PRODUCE** the records (books, papers, or other documents) indicated in Block 4, to the CBP, ICE, or USCIS Official named in Block 3 at the place, date, and time specified.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws. Failure to comply with this subpoena may subject you to an order of contempt by a federal District Court, as provided by 8 U.S.C. § 1225(d)(4)(B).

3. (A) CBP, ICE or USCIS Official before whom you are required to appear	(B) Date
Name	(C) Time <input checked="" type="checkbox"/> a.m. <input type="checkbox"/> p.m.
Title	
Address	
Telephone Number	

4. Records required to be produced for inspection



If you have any questions regarding this subpoena, contact the CBP, ICE, or USCIS Official identified in Block 3.

5. Authorized Official

(Signature)

(Printed Name)

(Title)

(Date)

DHS Form I-138 (6/09)

EXHIBIT 5: SAMPLE NOTICE TO APPEAR

U.S. Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: FINS: File No:
DOB: Event No:

In the Matter of:

Respondent: currently residing at:

(Number, street, city and ZIP code)

(Area code and phone number)

- 1. You are an arriving alien.
2. You are an alien present in the United States who has not been admitted or paroled.
3. You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30(f)(2) 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

(Complete Address of Immigration Court, including Room Number, if any)
on (Date) at (Time) to show why you should not be removed from the United States based on the

charge(s) set forth above.

(Signature and Title of Issuing Officer)

Date:

(City and State)

See reverse for important information

Form I-862 (Rev. 08/01/07)

Office of Investigations

U.S. Department of Homeland Security

[Address]

[Address]



U.S. Immigration
and Customs
Enforcement

NOTICE OF INSPECTION

[Date]

[Name of Company Official]

[Company Name]

[Company Address]

Dear Sir/Madam:

Section 274A of the Immigration and Nationality Act, as amended by the Immigration Reform and Control Act of 1986, requires employers to hire only United States citizens and aliens who are authorized to work in the United States. Employers must verify employment eligibility of persons hired after November 6, 1986 using the Employment Eligibility Verification Form I-9.

U.S. Immigration and Customs Enforcement (ICE) regulations require the provision of three days notice prior to conducting a review of an employer’s Forms I-9. This letter serves as advance notice that ICE has scheduled a review of your forms for *Insert date and time*. You may, however, waive the three-day period, should you wish to do so, by annotating and signing the bottom of this letter and advising this office of your decision.

During the review, *Insert name and title of ICE point of contact* will discuss the requirements of the law with you and inspect your Forms I-9. The purpose of this review is to assess your compliance with the provisions of the law. ICE will make every effort to conduct the review of records in a timely manner so as not to impede your normal business routine.

Sincerely,

Insert name

Insert title (GS or above)

I wish to waive the three day notice to which I am entitled by regulation.

(Printed Name)

(Signature)

(Date)



DEFINITIONS: N/A

ATTACHMENTS: N/A

APPROVAL DATE: 10/9/25 **Katrina S. Shelby, Chief Compliance Officer**

Department/Service Director, Manager or Supervisor

11/20/25 **Environment of Care Committee**

Applicable Administrator, Hospital or Medical Committee

11/25/25 **Patient Safety and Quality Committee**

Applicable Administrator, Hospital or Medical Committee

1/7/26 **Quality Management Committee**

Applicable Administrator, Hospital or Medical Committee

5/5/26 **Board of Supervisors**

Approved by the Governing Body

REPLACES: N/A

EFFECTIVE: 1/7/26

REVISED: N/A

REVIEWED: N/A