

MSHS Policy For Interaction with a Law Enforcement concerning Immigration Matters

Dated January 28, 2025, Version 2.0

I. BRIEF POLICY SUMMARY/PURPOSE

This policy outlines the Mount Sinai Health System Response to federal, state and local law enforcement regarding immigration matters.

II. SCOPE

Adherence to this policy applies to all members of the Mount Sinai Health System workforce including, but not limited to employees, medical staff, volunteers, students, and other persons performing work for or at Mount Sinai Health System.

III. DEFINITIONS

US Immigration and Customs Enforcement (ICE): a law enforcement component of the Department of Homeland Security (DHS)

System Law Enforcement Liaison: Vice President of Security and Protective Services who works in conjunction with the Office of General Counsel

Federal Law Enforcement Officers (LEO): Any law enforcement officer charged with enforcing federal law, to include, FBI Agents, Secret Service, U.S. Marshals or any state or local law enforcement officer who has been deputized to enforce federal law.

IV. POLICY

If any LEO comes to a MSHS facility requesting information or assistance regarding any immigration matter, all staff should take the following steps:

1. Ask the agent/officer for their name, credential/badge number, and a business card if possible.
2. Contact Security and have a Security Supervisor escort the LEO to the security office or a location near the lobby or reception.
3. Ask the LEO why they need access to the care site and/or what information they are looking for.
4. Contact the Vice President for Security and Protective Services or his designee for guidance on next steps who will confer with the Office of General Counsel.
5. Ask the LEO if they have any documents that relate to their visit. Specifically ask if they have a warrant or subpoena? Request a copy and/or take a photo of the documents.
6. Inform the officer that you have been instructed to seek guidance within your organization on these matters. Tell the officer to wait while you make the appropriate notifications.
7. The VP, for Security and Protective or his designee will give you direct guidance on next steps after conferring with the Office of General Counsel.
8. Never engage in a physical or verbal altercation with any law enforcement officer.
9. If you feel you must comply with the request before you can follow this process, please attempt to

do the following, (if you can do it in a safe manner):

- a. Work with security to file an incident report to include any available information, i.e., agency, names of LEOs, what areas of the facility were accessed, information requested and the identity, if known, of any people arrested, interrogated, or detained by the LEO.
- b. Take photos or video if possible.

V. PROCEDURE

A. PROCEDURE

1. Notification procedure outlined in Annex A.
2. Questions and Answers documentation outlined in Annex B.
3. MSHS LEO Decisional Matrix in Annex C.

VI. REFERENCES

Optional. Lists and links related policies, standards, laws, procedures and other internal or external documents that provide helpful, relevant information. Include links to forms or tools that are required for compliance with the policy.