



January 23, 2025

**ILLINOIS HEALTH AND HOSPITAL ASSOCIATION
M E M O R A N D U M**

SUBJECT: Update on ICE Enforcement Actions and Resources for Hospitals

On Jan. 21, the U.S. Dept. of Homeland Security (DHS) published a [statement](#) entitled “Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole.” This statement explained that on Jan. 20, the Acting DHS Secretary, Benjamine Huffman, issued a directive rescinding the Biden Administration’s guidelines for Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) enforcement actions. Although this press statement claims that this directive has been issued, at this time no formal revocation order has been posted to DHS’ website. Thus, it is unclear whether or not or exactly how this revocation was issued.

The purportedly revoked [guidelines](#), which were enacted in 2021 by former DHS Secretary Alejandro Mayorkas, instructed ICE and CBP to refrain, to the extent possible, from apprehending unauthorized immigrants at or near “sensitive locations” or “protected areas” — in other words, locations “that would restrain people’s access to essential services or engagement in essential activities.” Those locations included hospitals and other healthcare facilities; schools; places of worship; shelters; relief centers; and public demonstrations, like rallies and protests. By rescinding this guidance, ICE and CBP now have greater authority to visit these locations and conduct enforcement actions on their premises.

Prior to this development, on Jan. 10, the City of Chicago and Mayor Brandon Johnson’s Administration reaffirmed their commitment to the [Welcoming City Ordinance](#), as well as their intent to remain compliant with the [Illinois Trust Act](#). The Mayor’s Jan. 10 press release included recommended guidelines for visits by federal representatives. Hospitals may wish to review those recommendations which are available [here](#).

Additionally, many national and Illinois-based immigration rights groups have also issued guidance which may be useful. Such organizations and guidance include, but are not limited to, the following:

- [American Business Immigration Coalition](#)
- [Catholic Charities Archdiocese of Chicago](#)
- [Chicago-Kent College of Law – Immigration Clinic](#)
- [DePaul College of Law – Asylum and Immigration Law Clinic](#)
- [Doctors for Immigrants](#)
- [Erie Neighborhood House](#)

- [Greater Chicago Legal Counsel](#)
- [Illinois Coalition for Immigrant and Refugee Rights \(ICIRR\)](#)
- [The Illinois Alliance for Welcoming Health Care](#)
- [National Immigrant Justice Center](#)
- [National Immigration Law Center](#)
- [New American Welcome Center, University YMCA](#)
- [Northwestern Pritzker School of Law – Bluhm Legal Clinic](#)
- [World Relief Chicagoland](#)

Hospitals should consult with their legal counsel for further guidance.

IHA will continue to monitor this situation and provide updates as they become available so that hospitals can continue to support each person's quest for optimum health and ensure that all individuals and communities have access to high-quality healthcare at the right time and in the right setting.

In the meantime, if you have any questions, please [Contact Us](#).