

September 12, 2025

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

SUBJECT: Resources for Hospitals Regarding Upcoming ICE Enforcement Actions

Given the U.S. Dept. of Homeland Security's (DHS) recent announcement of the commencement of "Operation Midway Blitz," an immigration enforcement operation in Chicago as part of the Trump Administration's effort to target "sanctuary cities," this memo provides reminders to hospitals about how to respond to Immigration and Customs Enforcement (ICE) activities.

On Jan. 23, IHA published a member memo explaining DHS' [statement](#) entitled "Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole," which rescinded the Biden Administration's guidelines for ICE and Customs and Border Protection (CBP) enforcement actions. The Jan. 23 IHA memo is available [here](#).

The revoked [guidelines](#) instructed ICE and CBP to refrain, to the extent possible, from apprehending unauthorized immigrants at or near "sensitive locations" or "protected areas" — such as hospitals and other healthcare facilities, schools, places of worship, shelters, relief centers and at 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.

Despite this development, the City of Chicago and Illinois continue to reaffirm their commitment to the [Welcoming City Ordinance](#) and the [Illinois Trust Act](#), respectively. In early January the City released [guidelines](#) for visits by federal representatives.

However, on Monday, Sept. 8, the U.S. Supreme Court lifted a federal judge's order requiring the Trump Administration to stop ICE arrests without probable cause in Los Angeles. This [ruling](#) will let agents proceed with raids, including stopping or detaining people without "reasonable suspicion" that they are in the country illegally, by relying on race or ethnicity, or if they speak Spanish or English with an accent, among other factors.

Guidance on how to handle ICE raids has been issued by multiple immigration rights organizations, including, but 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](#)

In the event of an ICE visit, hospitals should immediately contact their legal counsel for further guidance and follow any policies that your organization has established.

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.