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CITY OF SAINT PAUL CITY COUNCIL

Ord 26-19 – Training, Reporting, and Information Sharing related to Civil Immigration Enforcement

Presented by Tim Greenfield, Chief Policy Officer



Overview of Ord 26-19 - Agenda

- Council Interest + Purpose
- Definitions and Exemptions
- Review of Training provisions
- Review of Reporting and Information Process provisions
- Review of Reports to Council and Timeline
- Final thoughts



Overview of Ord 26-19 - Council Interest and Purpose

- To learn from and about federal immigration activity in Saint Paul observed during 2025-2026 'surge'
- To ensure guidance and resources offered to City employees remains durable and best reflects City values found in the Separation ordinance
- To formalize best practices in public safety responses to immigration enforcement activity, including multi-department coordination on scene response and safety
- Establish policy mechanisms to prepare City for future immigration enforcement activity
- To create formalized communication and information channels related to immigration enforcement activity to improve policy outcomes and community relationships



Overview of Ord 26-19 - Definitions

- Chapter 44 – Chapter 44 of the Saint Paul Administrative Code (also known as the Separation Ordinance)
- Civil immigration enforcement means “any and all efforts by a law enforcement agency to investigate or penalize a person’s presence in, entry, or reentry to, or employment in the United States”
- General service employee means “any employee of the City of Saint Paul, the Saint Paul Public Library Agency, the Housing and Redevelopment Agency, and Saint Paul Regional Water Services”
- Public safety employee means any sworn and nonsworn personnel of SPPD and any employee of SPFD and EM



Overview of Ord 26-19 - Exemptions

- Ch. 44A is not intended to:
 - Restrict, interfere, or limit the civil immigration authority of the federal government
 - Restrict or interfere with the execution of court orders or judicial warrants or the enforcement of criminal law
 - Limit the rights of any person or entity under state or federal law
- Regulating, restricting, limiting, modifying, or repealing permitted employee actions under the Separation ordinance or otherwise required by court order or law
- Regulating, restricting, limiting, or modifying the Chief of Police or Fire Chief or Mayor's discretion to set department operational priorities or staff
- Create a private right of action for a violation of this ordinance



Overview of Ord 26-19: General Service Employee Training

- General service employees will receive annual training and information on the City's implementation, policies, regulations, protocols, guidance, or revisions to Chapter 44.
- The content of the training will include the following formalized guidance:
 - Encountering civil immigration enforcement activity in or at a city workplace, city work site, or in a city vehicle
 - Identifying potential ordinance violations related to prohibited law enforcement conduct
 - Distinctions between judicial and administrative warrants and public and non-public city spaces
 - Guidance on requests for information by immigration officials
 - The documentation process established later in Ch. 44A.
 - Information on accessing resources and supports



Overview of Ord 26-19: Supervisor of General service employee training

- Supervisors or CAO will be responsible for offering training specified earlier – both in orientation and as part of on-going training
- Supervisors also will receive role-specific training offered by the City Attorney's Office
- The content of the supervisor training will include the following formalized guidance:
 - Internal notification process between employee and supervisor/director, along with CAO
 - Best practices for interactions with civil immigration officials
 - Protocol if employee of supervisor is arrested or detained while performing job duties on city property



Overview of Ord 26-19: Public Safety Training

- Saint Paul Police Department will create a training policy on requirements of Chapter 44, mandatory for all current and future employees.
- Training shall include guidance and best practices for sworn personnel responding to calls for service involving civil immigration enforcement.
- Training shall also include operational guidance and cooperation between Police and the Department of Fire and Emergency Management during emergency incidents where civil immigration enforcement activity may be present



Overview of Ord 26-19: Employee Interaction Reporting

- The City will implement a policy that establishes an internal reporting mechanism for employees to promptly document any interaction involving civil immigration enforcement activity that occurs on city property, at a city work site, on a city lot, or in a city vehicle.
- Documentation requirements specified for the reports
- Does not apply to performance of duties authorized under the Separation ordinance or otherwise required by law or judicial subpoena.
- Except where required by law, no report required by this section may contain personally identifiable information or reported in a manner that would violate any applicable regulation related to data privacy and classification of information
- Does not apply to Public Safety employees



Overview of Ord 26-19: Public Reporting of Potential Ch. 44 Violations

- The City will adopt a policy to establish a reporting mechanism for the general public to report alleged violations of the Separation ordinance.
- Must be made available on the City's website in addition to a non-Internet reporting system.
- Specifies what individuals shall be allowed to report under the mechanism.
- Except where required by law, the reporting mechanism shall not condition submission of a report on either the provision of personally identifying information or the disclosure of immigration status



Overview of Ord 26-19: Information Sharing – Civil Immigration incidents

- Saint Paul Police Department will prepare summary data to be reported weekly to the City Council and the Mayor's Office regarding city resources expended in relation to civil immigration enforcement by any Public safety employee and will include any public information on the call or calls for service, including any documented use of Public safety employees under certain specified conditions in the Separation ordinance.
- If no known calls related to civil immigration enforcement occur, the report is not required.



Overview of Ord 26-19: Information Sharing – Civil Immigration incidents

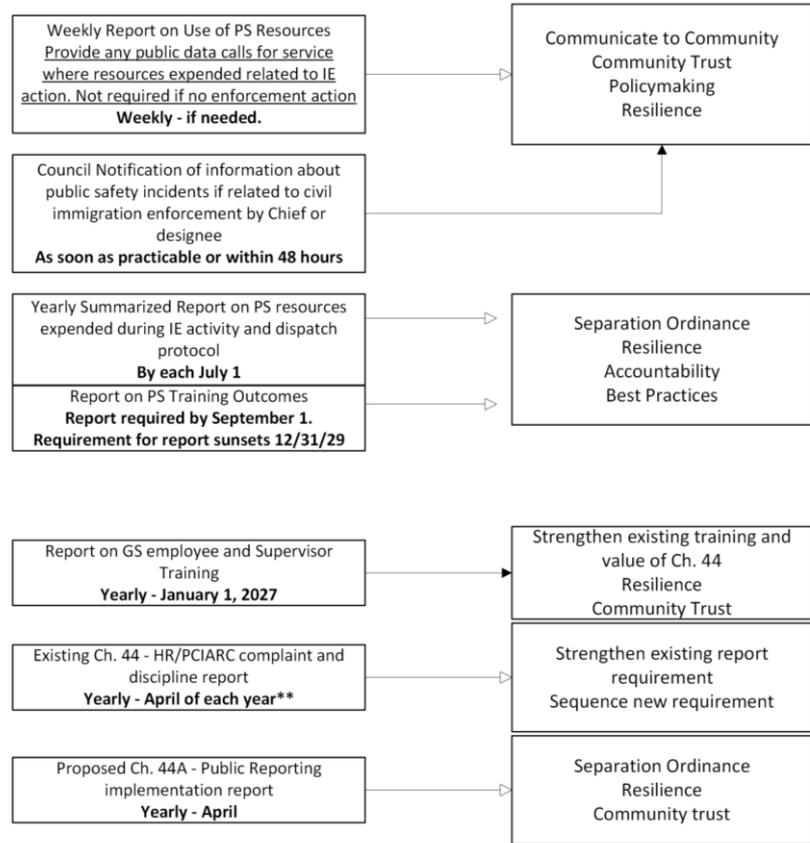
- For any public safety incident necessitating a call for service, the Chief of Police, or their designee, will report certain specified information to the City Council President, the Council representative where the incident occurred, and the Mayor's Office, as soon as is practicable, but no later than 48 hours after the incident.
- Information to be reported includes:
 - Known information about the incident
 - The reasons for public safety resources or personnel at the scene
 - Any identified law enforcement agencies involved in the actions beyond SPPD
 - Any other relevant public safety information useful for constituent services, public distribution, or media inquiry



Overview of Ord 26-19: Reporting and Purpose

- Ch. 44A establishes clear reporting mechanisms to improve transparency, accountability, and ensure residents' awareness of the operational impacts of immigration enforcement activity on city services and employees.
- Reporting mechanisms reinforce the City's commitment to the values and practices underlying the Separation ordinance while existing within current legal frameworks.
- Consistent with Council's budgetary and finance authority.

Overview of Ord 26-19: Reporting Timelines





Overview of Ord 26-19: General Service Training Report

- Requires a report from the City filed with the City Council on the prior year's training of General service employees and supervisors on the requirements of Ch. 44A and the Separation ordinance. Beginning January 1, 2027, and each year thereafter.



Overview of Ord 26-19: Public Safety Training Outcomes Report

- Saint Paul Police Department, Saint Paul Fire and Emergency Services, in consultation with CAO and HR, will report to the City Council and Mayor on the following:
 - Report and recommendations on public safety training outcomes
 - Implementation of Ch. 44 and Ch. 44A
 - Provide the content of the training program offered to Public safety personnel
 - **Identify and analyze any observed operational challenges to public safety from calls to service during civil immigration enforcement**
- Report requirement expires December 31, 2029.



Overview of Ord 26-19: Public Reporting Ch. 44 Violations program report

- Department of Human Resources will report in April of each year with the City Council and Mayor an annual report and recommendations regarding implementation.
- Intent is to submit concurrent with required report in Sec. 44.04, paragraph (d)
 - “The city office of human resources, in consultation with the police civilian internal affairs review commission and affected communities, shall prepare and file in April of each year with the city council and the mayor an annual report and recommendations regarding the implementation of this chapter.”



Overview of Ord 26-19: Public Safety Summary Report

- Requires by each July 1 from Saint Paul Police, in cooperation with Saint Paul Fire and Emergency Management where applicable, an annual report related to calls for service related to civil immigration enforcement.
- Report shall summarize available public data and provide any related costs to the City in responding to the call for service.
- Specifies certain parameters for summary report, including the general circumstances and rationale for use of those resources, any known information on the agency performing the action, whether any police reports were filed, whether first aid or emergency medical services were required at the scene, and any arrests



Overview of Ord 26-19: Public Safety Dispatch Report

- As part of the Public safety summary report described above, the report must also provide the Police Department's protocol for how calls for service are identified, routed, and prioritized.
- SPPD may request assistance from Ramsey County Emergency Communications in preparing the report.
- Report may describe the types of resources that may be deployed and any general guidance or policies offered to the public arising from these calls.



Overview of Ord 26-19: Final Thoughts

- Ensures consistent understanding and implementation of the Separation Ordinance.
- Strengthens institutional knowledge so that compliance remains durable across administrations and staffing changes. Over time, this will lessen the opportunity and indirect costs to the City should immigration enforcement activity ever re-escalate.
- Acknowledges the impact on City operations but also on City employees and services to its residents.
- Provides clear, unambiguous legal exceptions and clarifications to address concerns about regulating or limiting federal immigration activity or authority, creating additional employee liability, or changing or limiting the Chief of Police's discretion and operational control



Questions?