



## The 287(g) Program: An Overview

The 287(g) program is named for Section 287(g) of the Immigration and Nationality Act (INA)<sup>1</sup> and became law as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRAIRA). Through the 287(g) program, state and local law enforcement officers collaborate with the federal government to enforce federal immigration laws. In the past, the 287(g) program has been costly for localities, has historically targeted individuals with little or no criminal history, and has harmed the relationship between police and local communities. This fact sheet provides an overview of how the 287(g) program works and discusses some of the problems associated with its operation.

### How does the 287(g) program work?

Section 287(g) of the INA allows the Department of Homeland Security (DHS) to enter into formal written agreements (Memoranda of Agreement or MOAs) with state or local law enforcement agencies that deputize selected state and local law enforcement officers to perform certain functions of federal immigration agents.<sup>2</sup> As of December 2024, U.S. Immigration and Customs Enforcement (ICE) had 287(g) agreements with 135 state or local law enforcement agencies across 21 states.<sup>3</sup>

These MOAs are negotiated between DHS and the local authorities and include delegation of authority to some state and local officers. Deputized local law enforcement officers are required to abide by federal civil rights laws and regulations. In general, deputized officers are authorized to:

- interview individuals to ascertain their immigration status;
- check DHS databases for information on individuals;
- issue immigration detainers to hold individuals until ICE takes custody;
- enter data into ICE's database and case management system;
- issue a Notice to Appear (NTA), which is the official charging document that begins the removal process;
- make recommendations for voluntary departure in place of formal removal proceedings;
- make recommendations for detention and immigration bond; and
- transfer noncitizens into ICE custody.<sup>4</sup>

After a 287(g) agreement expires, DHS is not legally obligated to renew it. However, not all 287(g) agreements

include a specific expiration date.<sup>5</sup> Once a 287(g) agreement is entered into, it may be terminated at any time by either party.

## What types of 287(g) agreements exist?

Currently, two types of 287(g) agreements are employed in the field: the “jail enforcement” model and the “warrant service officer” model.<sup>6</sup>

- Under the **jail enforcement model (JEM)**, deputized officers may interrogate suspected noncitizens who have been arrested on state or local charges to determine their immigration status. Deputized officers may issue immigration detainers, which are administrative requests from ICE to law enforcement agencies to hold a non-citizen for up to 48 hours after they would otherwise be released. As of December 2024, ICE had 287(g) JEM agreements with 60 law enforcement agencies in 16 states.
- Under the **warrant service officer (WSO) model**, ICE trains, certifies, and authorizes selected state and local law enforcement officers to execute ICE administrative warrants. These officers are permitted to perform the arrest functions of an immigration officer within the law enforcement agency’s jails and/or correctional facilities. The WSO model differs from the jail enforcement model in that ICE does not authorize the local law enforcement officer to interrogate alleged noncitizens about their immigration status. As of December 2024, ICE had 287(g) WSO agreements with 75 law enforcement agencies in 11 states.<sup>7</sup>

Two additional types of 287(g) agreements—the “task force” model and the “hybrid” model—have been used in the past. However, they were both discontinued following an ICE policy memo in 2012 that stated other enforcement programs were a “more efficient use of resources for focusing on priority cases.”<sup>8</sup>

## How has the 287(g) program evolved over time?

In 2009, ICE renegotiated all existing MOAs using a new, standardized template. In 2013, the MOA was revised based on a recommendation from the Office of Inspector General to update language that did not clearly specify program requirements or provide a measurable standard for assessing compliance.<sup>9</sup> In 2020, 75 jail enforcement MOAs were renewed by ICE with revised language that removed end dates from the 287(g) agreements and reduced requirements for designated officers.<sup>10</sup>

Due to mounting concern over the impact of the 287(g) program on immigrants and police-community relations, and in response to the growth of another local law enforcement-federal immigration program, Secure Communities,<sup>11</sup> the task force and hybrid models were discontinued.

Federal funding for the 287(g) program hit a high in Fiscal Years (FY) 2010–2013 at \$68 million. Annual appropriations cover the cost of training 287(g) officers and fund the program’s management and oversight. Given the subsequent scaling back of the program, the request for appropriations decreased starting in FY 2014 to \$24 million, where it remained through FY 2022.

## **What training do deputized officers receive?**

Under the jail enforcement MOAs renewed by ICE in 2020, deputized 287(g) officers must be U.S. citizens and pass a background check conducted by ICE.<sup>12</sup> Any officer deputized under the program must complete a four-week Immigration Authority Delegation Program at the Federal Law Enforcement Training Center (FLETC) ICE Academy (ICEA) in Charleston, South Carolina. According to ICE, the training program teaches officers about “immigration law, the use of ICE databases, multi-cultural communication and the avoidance of racial profiling.”<sup>13</sup> At the end of the training program, officers must pass examinations with a minimum score of 70 percent in order to become deputized.<sup>14</sup>

Deputized officers can complete refresher training “as needed” with no mandatory minimum requirement and a maximum frequency of once every two years. In addition, they are not required to make a two-year commitment to the position, which was a requirement prior to the 2020 MOA revisions, allowing law enforcement agencies to move officers in and out of the 287(g) program with greater flexibility.

Training requirements are further reduced for officers who participate in the WSO Model, which requires only an eight-hour training on legal authorities and enforcement protocols facilitated by an ICE Field Office.<sup>15</sup> A 2021 report from the Government Accountability Office (GAO) found that ICE had failed to establish performance goals for the program, including how to effectively measure its oversight of law enforcement agency partners.<sup>16</sup>

## **Are localities responsible for 287(g) program costs?**

ICE covers the cost of training deputized officers in the 287(g) program, including travel and expenses. In addition, ICE is responsible for the installation and maintenance of the Information Technology (IT) infrastructure at partner law enforcement agency sites. State and local governments are responsible for all personnel costs, including salaries, benefits, and overtime, as well as all administrative supplies.<sup>17</sup> Some of the costs of detention may be reimbursed by the federal government through the State Criminal Alien Assistance Program (SCAAP). However, the federal government has never fully funded SCAAP, and reimbursements only cover a fraction of the costs incurred by states and localities.

## **How are jurisdictions chosen for the 287(g) program?**

Interested law enforcement agencies can send an inquiry about participation in the 287(g) program to ICE via email. According to ICE, the agency will then begin the process of evaluating the interested agency under its standards, including whether it has the capability to act as an ICE force multiplier,<sup>18</sup> and determine whether to sign a 287(g) agreement with the law enforcement agency. However, in 2021, the GAO report found that ICE was not considering the optimal use of resources and program benefits in the selection of future 287(g) participants, instead focusing primarily on signing as many agreements as possible regardless of the benefits.<sup>19</sup>

## **What problems has the 287(g) program caused?**

### ***287(g) agreements have resulted in widespread racial profiling***

- A 2011 investigation by the Department of Justice (DOJ) concluded that the Maricopa County Sheriff's Office in Arizona engaged in a pattern and practice of constitutional violations after entering a 287(g) agreement, including racial profiling of Latinos. For example, the investigation found that deputies of former Sheriff Joe Arpaio routinely conducted "sweeps" in Latino neighborhoods, and that Latino drivers in certain parts of Maricopa County were up to nine times more likely to be stopped than non-Latino drivers.<sup>20</sup> Following the investigation, the Obama administration terminated Maricopa County's 287(g) agreement.<sup>21</sup>
- A separate DOJ investigation concluded in 2012 that the Alamance County Sheriff's Office in North Carolina engaged in a pattern and practice of constitutional violations by unlawfully detaining and arresting Latinos. The investigation found that the sheriff's deputies set up checkpoints at entrances to Latino neighborhoods; that Latino drivers were up to 10 times more likely to be stopped than non-Latino drivers; and that Latino drivers were often arrested for traffic violations for which non-Latino drivers received only citations.<sup>22</sup> Following the investigation, DOJ brought a lawsuit against the department for racial profiling, DHS terminated Alamance County's participation in the 287(g) agreement, and the county has never rejoined the 287(g) program.<sup>23</sup>
- Researchers have found that 287(g) programs foster environments that increase racial profiling by law enforcement agents that disproportionately impacts Latino and Black community residents.<sup>24</sup> A 2022 study from Texas A&M University also found that this discriminatory behavior has affected law enforcement agencies that have not entered a formal ICE agreement, but are geographically proximate to an agency with an active agreement.<sup>25</sup>
- Despite the documented racial profiling caused by 287(g) programs, in states with growing anti-immigrant sentiments such as Florida, state lawmakers have expanded 287(g) programs. In the Florida legislature, lawmakers through SB1808 mandated that any law enforcement agency that operates a detention facility to enter a 287(g) agreement with ICE.<sup>26</sup>

### ***287(g) agreements often lead to immigration arrests of individuals with minor criminal histories***

- The Migration Policy Institute (MPI) conducted a comprehensive analysis of the 287(g) program in 2011 and found that half of all detainers issued through the program were for people who had committed misdemeanors and traffic offenses.<sup>27</sup>
- MPI found that some jurisdictions "target" their programs to identify individuals with serious criminal convictions. Other jurisdictions operate a "universal" model, designed to identify as many undocumented immigrants as possible, regardless of criminal history. These universal models were concentrated in the Southeast of the United States.<sup>28</sup>
- Studies in 2009 and 2010 by the University of North Carolina at Chapel Hill found that 287(g) agreements under the task force model in the state were primarily used to target offenders who posed no threat to public safety or individuals with no criminal record.<sup>29</sup> Overall, 33 percent of individuals detained through the 287(g)

program were charged with traffic violations; in Gaston County the figure rose to 57 percent.<sup>30</sup>

### ***287(g) agreements can be expensive for localities***

- In February 2017, Sheriff Ed Gonzalez announced that Harris County, Texas, would terminate its 287(g) agreement, saying that the decision was a resource allocation issue. The sheriff said he would put the \$675,000 the county spent on the program toward improving clearance rates of major crimes and other priorities.<sup>31</sup>
- Sheriff Eric Severson of Waukesha County, Wisconsin testified at a February 2017 Senate hearing that he did not have the resources for 287(g). When Senator Claire McCaskill asked him whether he planned to apply for the 287(g) program, Sheriff Severson replied:

*At this time, I don't have the resources to participate with that nor is our community structure such that I don't know if that is necessarily a high priority for us right now and again I am fortunate enough to report to you today that the instances of criminal activity of illegally present immigrants beyond their status is relatively uncommon in my County and generally in Wisconsin, it is less common than some other communities.*<sup>32</sup>

- A 2010 report by the University of North Carolina at Chapel Hill found that the first year of operating the 287(g) program in Mecklenburg County, North Carolina cost a total of \$5.3 million. Meanwhile, the first full year of operation in the state's Alamance County cost \$4.8 million.<sup>33</sup>
- A 2016 study by the Brookings Institution found that Prince William County, Virginia, had to raise property taxes and take money from its "rainy day" fund to implement its 287(g) program. The report found the program cost \$6.4 million in its first year and would cost \$26 million over five years. To cut costs, the county slashed \$3.1 million from its budget—money that was intended to buy video cameras for police cars to protect against allegations of racial profiling.<sup>34</sup>
- Before DHS revoked its 287(g) agreement with Maricopa County, Arizona in 2011, Sheriff Joe Arpaio's office created a \$1.3 million deficit in just three months, much of it due to overtime.<sup>35</sup>
- 287(g) has hindered the labor supply in industries that rely heavily on documented and undocumented immigrant workers. One study found that 287(g) was responsible for decreasing farm labor supply in several counties, leading to higher labor and fuel expenses.<sup>36</sup>
- 287(g) programs also influence immigrant relocation, with one study finding that the propensity for immigrants to relocate nearly doubles in the presence of an existing 287(g) agreement.<sup>37</sup>

### ***ICE does not provide sufficient training or supervision to local police under 287(g) agreements***

- A January 2021 GAO report found that ICE had failed to establish performance goals for the 287(g) program and did not have measures in place to systematically assess its effectiveness. Without a set of performance

measures that are actively tracked and monitored, the report concluded that ICE would be unable to provide effective oversight over law enforcement agency partners since there is no standard to determine their compliance with the MOA.<sup>38</sup>

- A March 2010 report by the DHS Office of Inspector General (OIG) found that ICE and its local law enforcement partners had not complied with the terms of their 287(g) agreements; that the standards by which deputized officers were evaluated contradicted the stated objectives of the 287(g) program; that the program was poorly supervised by ICE; and that additional oversight was necessary.<sup>39</sup>
- In September 2018, the OIG reported that law enforcement training was inefficient and that ICE was not monitoring officers through the completion of the required training. Although the participating local enforcement agencies were expected to function under ICE supervision, the program managers were stretched thin while assigned to oversee several jurisdictions spread over thousands of miles. This poor planning hindered ICE's ability to adequately manage, oversee, and educate participating agencies in enforcing immigration laws correctly.<sup>40</sup>
- DHS's budget request for Fiscal Year 2022 included funding requests for the 287(g) program but acknowledged its shortcomings. It stated:

*While the 287(g) program has yielded successes, ICE recognizes the program is not universally regarded as the most effective or appropriate model for all stakeholders or in every jurisdiction.*

### **287(g) agreements threaten community safety and hinder community policing**

- In 2010, the Police Executive Research Forum interviewed Maricopa County law enforcement executives who stated that by enforcing federal immigration law, the sheriff's office damaged the relationship between law enforcement and the Latino community.<sup>41</sup>
- In 2005, the International Association of Chiefs of Police (IACP), the nation's premier law enforcement association, stated:

*Local police agencies depend on the cooperation of immigrants, legal and [otherwise], in solving all sorts of crimes and in the maintenance of public order. Without assurances that they will not be subject to an immigration investigation and possible deportation, many immigrants with critical information would not come forward, even when heinous crimes are committed against them or their families.<sup>42</sup>*

- In 2019, the Major Cities Chiefs Association (MCCA), a group of police chiefs from the 78<sup>43</sup> largest police departments in the United States and Canada, found that "without assurances that contact with the police would not result in purely civil immigration enforcement action, the hard-won trust, communication and cooperation from the immigrant community would disappear."<sup>44</sup>

### **How does the 287(g) program work in conjunction with other federal-local programs?**

- DHS maintains several different partnerships with state and local police agencies aimed at identifying deportable individuals. In addition to the 287(g) program, DHS administers the Criminal Apprehension Program (CAP) which gives ICE access to jails and prisons where ICE officers screen and interview individuals in order to identify noncitizens for deportation.<sup>45</sup> Additionally, Secure Communities is a program through which the fingerprints of all persons arrested by state or local police are submitted to DHS and checked against immigration databases.<sup>46</sup> If ICE believes an individual identified through Secure Communities is deportable, it can take custody of them or detain them directly from the law enforcement agency's custody.<sup>47</sup>

When a person is identified and taken into ICE custody, it can be difficult to determine which program was responsible. For example, when there is a Secure Communities "hit," a CAP officer may go to the prison or jail and conduct an interview with the individual to determine whether he or she is removable. Or if the jail has a 287(g) program, a deputized officer may perform the same function.

## Endnotes

- 1 18 U.S.C. § 1357(g) (2008).
- 2 U.S. Immigration and Customs Enforcement, “Delegation of Immigration Authority Section 287(g) Immigration and Nationality Act,” updated December 18, 2024, <https://www.ice.gov/287g>.
- 3 Ibid.
- 4 Randy Capps, Marc R. Rosenblum, Cristina Rodríguez, and Muzaffar Chishti, “Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement” (Washington, DC: Migration Policy Institute, 2011), 13-14, <http://www.migrationpolicy.org/research/delegation-and-divergence-287g-state-and-local-immigration-enforcement>.
- 5 Immigrant Legal Resource Center, “Changes to the 287(g) Program,” October 1, 2020, [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf).
- 6 Ibid.
- 7 U.S. Immigration and Customs Enforcement, “Delegation of Immigration Authority Section 287(g) Immigration and Nationality Act,” updated December 18, 2024, <https://www.ice.gov/287g>.
- 8 U.S. Immigration and Customs Enforcement, “FY 2012: ICE Announces Year-End Removal Numbers, Highlight Focus on Key Priorities and Issues New National Detainer Guidance to Further Focus Resources,” last accessed July 7, 2021, <https://www.ice.gov/news/releases/fy-2012-ice-announces-year-end-removal-numbers-highlights-focus-key-priorities-and>.
- 9 U.S. Department of Homeland Security, Office of Inspector General, The Performance of 287(g) Agreements: FY 2013 Update, September 2013, [https://www.oig.dhs.gov/assets/Mgmt/2013/OIG\\_13-116\\_Sep13.pdf](https://www.oig.dhs.gov/assets/Mgmt/2013/OIG_13-116_Sep13.pdf).
- 10 Immigrant Legal Resource Center, “Changes to the 287(g) Program,” October 1, 2020, [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf). [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf).
- 11 American Immigration Council, “Secure Communities: A Fact Sheet” (Washington, DC: November 29, 2011), <https://www.americanimmigrationcouncil.org/research/secure-communities-fact-sheet>.
- 12 Immigrant Legal Resource Center, “Changes to the 287(g) Program,” October 1, 2020, [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf).
- 13 U.S. Immigration and Customs Enforcement, “Updated Facts on ICE’s 287(g) Program,” last updated January 7, 2021, <https://www.ice.gov/factsheets/287g-reform>.
- 14 Immigrant Legal Resource Center, “Changes to the 287(g) Program,” October 1, 2020, [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf).
- 15 U.S. Immigration and Customs Enforcement, “Enforcement and Removal Operations: 287(g) Warrant Service Officer (WSO) Model,” last accessed June 1, 2021, <https://www.ice.gov/doclib/about/offices/ero/pdf/WSOPromo.pdf>.
- 16 U.S. Government Accountability Office, “Immigration Enforcement: ICE Can Further Enhance Its Planning and Oversight of State and Local Agreements,” January 27, 2021, <https://www.gao.gov/products/gao-21-186>.
- 17 Immigrant Legal Resource Center, “Changes to the 287(g) Program,” October 1, 2020, [https://www.ilrc.org/sites/default/files/resources/changes\\_to\\_287g\\_10.20.20.pdf](https://www.ilrc.org/sites/default/files/resources/changes_to_287g_10.20.20.pdf).
- 18 U.S. Government Accountability Office, Immigration Enforcement: ICE Can Further Enhance Its Planning and Oversight of State and Local Agreements (Washington, DC: 2021), <https://www.gao.gov/assets/gao-21-186.pdf>.
- 19 Ibid.
- 20 Letter from Thomas E. Perez, Asst. U.S. Attorney General, to Bill Montgomery, Maricopa County Attorney, Re: United States’ Investigation of the Maricopa County Sheriff’s Office, December 15, 2011, [http://www.justice.gov/crt/about/spl/documents/mcso\\_findletter\\_12-15-11.pdf](http://www.justice.gov/crt/about/spl/documents/mcso_findletter_12-15-11.pdf).
- 21 Ray Stern, “Feds Pull 287(g) Authority From Maricopa County Jails Because of Civil Rights Violations,” Phoenix New Times, December 15, 2011, <https://www.phoenixnewtimes.com/news/feds-pull-287-g-authority-from-maricopa-county-jails-because-of-civil-rights-violations-6631025>.
- 22 Letter from Thomas E. Perez, Asst. U.S. Attorney General, to Clyde B. Albright, Alamance County Attorney, Re: United States’ Investigation of the Alamance County Sheriff’s Office, September 18, 2012, <http://www.justice.gov/iso/opa/resources/171201291812462488198.pdf>.
- 23 Isaac Groves, “Alamance Sheriff won’t rejoin 287(g), but could still hold ICE detainees,” The Times-News, November 16, 2018, <https://www.thetimesnews.com/news/20181116/alamance-sheriff-wont-rejoin-287g-but-could-still-hold-ice-detainees>.



- 24 Charles R. Epp, Steven Maynard-Moody, and Donald P. Haider-Markel, *Pulled Over: How Police Stops Define Race and Citizenship*, University of Chicago Press, 2014.
- 25 Huyen Pham and Pham Hoang Van, “Sheriffs, State Troopers, and the Spillover Effects of Immigration Policing,” *Ariz. L. Rev.* 64 (2022): 463, <https://scholarship.law.tamu.edu/cgi/viewcontent.cgi?article=2541&context=facscholar>.
- 26 Florida Senate Bill CS/SB 1808, effective date June 17, 2022, <https://www.flsenate.gov/Session/Bill/2022/1808/BillText/er/PDF>.
- 27 Randy Capps, Marc R. Rosenblum, Cristina Rodríguez, and Muzaffar Chishti, “Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement” (Washington, DC: Migration Policy Institute, 2011), 13-14, <http://www.migrationpolicy.org/research/delegation-and-divergence-287g-state-and-local-immigration-enforcement>.
- 28 *Ibid.*, 5, 10, 23-25.
- 29 Deborah M. Weissman, Rebecca C. Headen, and Katherine Lewis Parker, “The Policies and Politics of Local Immigration Enforcement Laws: 287(g) Program in North Carolina” (Chapel Hill: University of North Carolina, 2009), 46, <http://www.law.unc.edu/documents/clinicalprograms/287gpolicyreview.pdf>; see also Mai T Nguyen and Hannah Gill, “The 287(g) Program: The Costs and Consequences of Local Immigration Enforcement in North Carolina Communities” (Chapel Hill: University of North Carolina, 2010), [https://www.academia.edu/31571070/The\\_Costs\\_and\\_Consequences\\_of\\_Local\\_Immigration\\_Enforcement\\_in\\_North\\_Carolina\\_Communities\\_The\\_287\\_g\\_Program\\_The\\_Latino\\_Migration\\_Project](https://www.academia.edu/31571070/The_Costs_and_Consequences_of_Local_Immigration_Enforcement_in_North_Carolina_Communities_The_287_g_Program_The_Latino_Migration_Project).
- 30 Mai T Nguyen and Hannah Gill, “The 287(g) Program: The Costs and Consequences of Local Immigration Enforcement in North Carolina Communities” (Chapel Hill: University of North Carolina, 2010), [https://www.academia.edu/31571070/The\\_Costs\\_and\\_Consequences\\_of\\_Local\\_Immigration\\_Enforcement\\_in\\_North\\_Carolina\\_Communities\\_The\\_287\\_g\\_Program\\_The\\_Latino\\_Migration\\_Project](https://www.academia.edu/31571070/The_Costs_and_Consequences_of_Local_Immigration_Enforcement_in_North_Carolina_Communities_The_287_g_Program_The_Latino_Migration_Project).
- 31 James Pinkerton and St. John Barned-Smith, “Sheriff Cuts Ties with ICE Program Over Immigrant Detention,” *Houston Chronicle*, February 21, 2017, <http://www.houstonchronicle.com/news/houston-texas/houston/article/Sheriff-cuts-ties-with-ICE-program-over-immigrant-10949617.php>.
- 32 The Effects of Border Insecurity and Lax Immigration Enforcement on American Communities: Hearing Before the Senate Comm. on Homeland Security and Governmental Affairs, 115th Cong. (2017), <https://www.hsgac.senate.gov/the-effects-of-border-insecurity-and-lax-immigration-enforcement-on-american-communities>.
- 33 Mai T Nguyen and Hannah Gill, “The 287(g) Program: The Costs and Consequences of Local Immigration Enforcement in North Carolina Communities” (Chapel Hill: University of North Carolina, 2010), [https://www.academia.edu/31571070/The\\_Costs\\_and\\_Consequences\\_of\\_Local\\_Immigration\\_Enforcement\\_in\\_North\\_Carolina\\_Communities\\_The\\_287\\_g\\_Program\\_The\\_Latino\\_Migration\\_Project](https://www.academia.edu/31571070/The_Costs_and_Consequences_of_Local_Immigration_Enforcement_in_North_Carolina_Communities_The_287_g_Program_The_Latino_Migration_Project).
- 34 Audrey Singer, Jill H. Wilson, and Brooke DeRenzis, “Immigrants, Politics, and Local Response in Suburban Washington” (Washington, DC: Brookings Institution, February 2009), 16, [https://www.brookings.edu/wp-content/uploads/2016/06/0225\\_immigration\\_singer.pdf](https://www.brookings.edu/wp-content/uploads/2016/06/0225_immigration_singer.pdf).
- 35 Ryan Gabrielson, “Overtime led to MCSO budget crisis, records show,” *East Valley Tribune*, July 10, 2008, [https://www.eastvalleytribune.com/local/reasonable-doubt-part-ii-overtime-led-to-mcso-budget-crisis/article\\_4dee9154-9ce5-581d-82fc-39cd77d84877.html](https://www.eastvalleytribune.com/local/reasonable-doubt-part-ii-overtime-led-to-mcso-budget-crisis/article_4dee9154-9ce5-581d-82fc-39cd77d84877.html).
- 36 Jennifer Ifft and Margaret Jodlowski, “Is ICE freezing US agriculture? Farm-level adjustment to increased local immigration enforcement,” *Labour Economics* Volume 78, 102203, October 2022, <https://www.sciencedirect.com/science/article/abs/pii/S092753712200094X>.
- 37 Tara Watson, “Enforcement and Immigrant Location Choice,” *SSRN Electronic Journal*, October 22, 2014, <https://doi.org/10.2139/ssrn.2512416>.
- 38 U.S. Government Accountability Office, “Immigration Enforcement: ICE Can Further Enhance Its Planning and Oversight of State and Local Agreements,” January 27, 2021, <https://www.gao.gov/products/gao-21-186>.
- 39 U.S. Department of Homeland Security, Office of Inspector General, “The Performance of 287(g) Agreements: FY 2013 Update,” September 6, 2013, <https://www.oig.dhs.gov/reports/2013-09/performance-287g-agreements-fy-2013-update/oig13-116sep13>.
- 40 U.S. Department of Homeland Security, Office of Inspector General, “Lack of Planning Hinders Effective Oversight and Management of ICE’s Expanding 287(g) Program,” September 2018, <https://www.oversight.gov/sites/default/files/oig-reports/OIG-18-77-Sep18.pdf>.
- 41 Debra A. Hoffmaster, et al., “Police and Immigration: How Chiefs are Leading Their Communities through the Challenges” (Washington, DC: Police Executive Research Forum, 2010), 39, <http://www.immigrationresearch-info.org/report/other/police-and-immigration-how-chiefs-are-leading-their-communities-through-challenges>.
- 42 International Association of Chiefs of Police, “Enforcing Immigration Law: The Role of State, Tribal and Local Law Enforcement,” *Police Chief* 72, no. 4 (2005): 5, <http://www.markwynn.com/trafficking/enforcing-immigration-law-the-role-of-state-tribal-and-local-le-2004.pdf>.
- 43 Tom Jackman, “U.S. police chiefs call for meeting with Homeland Security over immigration issues,” *Washington Post*, May 30, 2019,

<https://www.washingtonpost.com/crime-law/2019/05/30/us-police-chiefs-call-meeting-with-homeland-security-over-immigration-issues/>.

- 44 M.C.C. Immigration Committee, “M.C.C. Immigration Committee Recommendations for Enforcement of Immigration Laws By Local Police Agencies,” Major Cities Chiefs Association, June 2006, 6, <https://images.procon.org/wp-content/uploads/sites/40/recommendationsforenforcementofimmigrationlawsbylocalpoliceagencies.pdf>.
- 45 U.S. Immigration and Customs Enforcement, “Criminal Apprehension Program,” updated May 3, 2023, <https://www.ice.gov/identify-and-arrest/criminal-apprehension-program>.
- 46 American Immigration Council, “Secure Communities: A Fact Sheet,” Washington, DC, November 29, 2011, <https://www.americanimmigrationcouncil.org/research/secure-communities-fact-sheet>.
- 47 Ibid.

