



CITY OF BALTIMORE  
MAYOR BRANDON M. SCOTT

<b>TO</b>	The Honorable President and Members of the Baltimore City Council
<b>FROM</b>	Catalina Rodriguez Lima, Director, Mayor's Office of Immigrant Affairs
<b>CC</b>	Mayor's Office of Government Relations
<b>DATE</b>	March 3, 2026
<b>SUBJECT</b>	Bill 26-0144: Baltimore City Policies and Procedures—Safe Spaces and Communities

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**Position: Favorable with amendments**

### **BILL SYNOPSIS**

This bill aims to ensure that: certain “covered entities,” defined as Baltimore City agencies and those entities that receive funding from the City, treat residents equally and regardless of immigration status; limit how said covered entities can cooperate with immigration enforcement agents; and protect residents’ personal information from being used for immigration enforcement purposes. It also requires covered entities to establish procedures for responding to immigration enforcement actions and sets standards for how the Baltimore Police Department interacts with federal immigration authorities.

Sections 4-4 through 4-6 names the Mayor’s Office of Immigrant Affairs (MIMA) as the agency responsible for retaining covered entities’ plans in relation to immigration enforcement actions in their facilities, compiling and submitting an annual report summarizing such incidents, and developing and delivering training on this subject.

### **SUMMARY OF POSITION**

Our office endorses the intent of this bill: establishing Baltimore City facilities as a safe space for residents, regardless of immigration or citizenship status. It is critical to the well-being of our communities that residents feel safe accessing City services and that City facilities are not used as settings for immigration enforcement.

Toward this end and prior to the introduction of this bill, MIMA collaborated with the Chief Administrative Office and the Law Department last fall to issue an internal policy establishing a standardized protocol for how staff at City facilities should respond to immigration enforcement actions, as mandated by Maryland House Bill 1222 and in alignment with related guidance from the Maryland Office of the Attorney General. This internal policy was recently reaffirmed in Mayor Brandon M. Scott's executive order, effective March 2, 2026.

However, our office's primary concern is that, in its effort to provide robust protections for immigrant residents, the bill may be overly expansive in ways that could create challenges for effective implementation. In this vein, we have identified three areas for consideration that correspond with the amendments proposed later in this document.

**Challenging concepts of “covered entity” and “direct public service”:** As the agency tasked with the oversight, reporting, and training of this legislative mandate, MIMA has identified several considerations regarding the bill's scope. Extending the mandate to any entity receiving City funding raises feasibility concerns regarding our office's ability to ensure consistent oversight and compliance across external organizations. At the same time, the concept of a “direct public service” may unintentionally narrow the scope for City agencies, given that current guidance applies to all City agencies and facilities, regardless of whether they provide goods and services. As drafted, the bill simultaneously expands the scope to private entities while potentially limiting its application within City government based on the open-ended concept of a direct public service. Clarifying these elements would help support effective implementation.

**Individualized instead of standardized “immigration enforcement action response plans”:** As detailed in this bill, each covered entity is required to create its own plan, which may create additional administrative demands and present implementation challenges. Additionally, this requirement appears to create a contradiction between Sections 4-4 and 4-6 in that covered entities are responsible for developing individualized plans while MIMA is tasked with providing standardized training to those same entities. In order to better execute the intent of this bill, a uniform policy would be a more practicable approach.

**Increased administrative burden without sufficient allocation of resources:** MIMA currently carries out its work with a small team managing a broad portfolio of responsibilities. This workload has been further intensified by the need to respond to a constantly evolving and increasingly challenging federal immigration enforcement environment. Our office recognizes that the oversight over, reporting for, and training related to a policy of this nature align with MIMA's mission and role. However, the responsibilities outlined in Sections 4-4 through 4-6 would represent a significant expansion of duties relative to our current staffing capacity.

While the intent of the bill is commendable, aligning the scope of implementation with available

resources will be important to ensuring that the policy can be carried out effectively and sustainably.

## **FISCAL IMPACT**

If enacted, MIMA will require additional resources to fully implement this bill's provisions, chiefly increased staffing to support policy development for, communication with, and management over other City agencies in this matter.

**Training and Personnel:** MIMA is a small office with limited personnel capacity, currently staffed by only three permanent full-time positions in addition to the director, with a contractual employee overseeing communications and strategic policy responsibilities. This represents a significant personnel constraint, particularly in light of the increased demands on the office resulting from the same federal immigration enforcement environment that has prompted this legislation. To effectively provide training to the several thousand City staff and hundreds of City facilities covered by this mandate, MIMA would likely need to engage an external vendor to develop a Workday course and/or deliver training through other formats. Additional staff capacity will also be necessary to support the existing managerial role and carry out the increased administrative workload created by the legislation.

**Materials:** Additionally, there are material costs associated with the enforcement of this proposed legislation. If the bill passes in its current form and MIMA is tasked with its implementation, our office would require funding for the fabrication and installation of permanent signage to designate non-public spaces within City facilities, given the bill's mandate that access to "space[s]... not regularly accessible to the public" be limited to immigration officials, as well as printing necessary documents, such as incident report forms and quick reference handouts to bolster policy training for and compliance by staff.

Please refer to the Department of Finance's bill report for exact costs.

## **AMENDMENTS**

### **§ 4-1. Definitions**

- *Requested amendment:* Strike Clause C in its entirety and replace any instance of "covered entity" with "agency" in the remainder of the bill.
- *Rationale:* Given our office's recent experience developing and administering an analogous internal policy, we recommend constraining the scope of the bill to City agencies (at the exclusion of private entities that receive any amount of funding from the city) while expanding its scope to all City agencies (regardless of the provision of goods or services).

#### **§ 4-4. Immigration Enforcement Action Response Plan**

- *Requested amendment:* Append to Clause A: “or, alternatively, the Mayor or an office or agency designated by the Mayor may adopt guidelines or rules applicable to multiple agencies, in furtherance of the efficient implementation of this subtitle.”
- *Rationale:* Allowing a designated agency (e.g., MIMA) to adopt guidelines or rules applicable to multiple agencies would streamline adoption and engender meaningful implementation.

#### **§ 4-5. Reporting**

- *Requested amendment:* Strike “March 1” and replace with “April 1.”
- *Rationale:* As the agency tasked with compiling, drafting, and issuing this report, we feel that a more feasible window for this responsibility is a full fiscal quarter.