

Teachers' Efforts to Support Undocumented Students Within Ambiguous Policy Contexts

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In this research article, authors Hillary Parkhouse, Virginia Massaro, Melissa Cuba, and Carolyn Waters examine teachers' perceptions of their responsibilities to support undocumented students and the barriers they encounter in fulfilling them. Since the 1982 Plyler v. Doe decision guaranteed public K–12 education to undocumented students, there has been little policy guidance on how schools can support these students, particularly within the increasingly contentious political climate. Focusing on one new destination area in Virginia, the authors interviewed eighteen teachers who expressed their support for undocumented students. Of various subjects, grade levels, and years' experience, these teachers represent a critical case in that they were likely to be more attentive to the experiences of these students than would the general teacher population. They took a variety of actions to enhance students' feelings of security and normalcy through curricular decisions, emotional and material support, and adaptive advocacy at the school and district levels. However, the lack of clear policy led to varied interpretations of their responsibilities and a fear that their actions violated school or district guidelines.

Keywords: undocumented immigrants, education policy, elementary secondary education, immigration, teacher role, case study

Given that approximately 7.3 percent of the K–12 student population are undocumented immigrants or children of undocumented immigrants (Passel & Cohn, 2016), the research on how schools and educators respond to this population’s unique needs is shockingly scant. The last decade has seen an increase in studies of the experiences of undocumented youth at school; however, most of these were conducted in higher education settings (Gonzales et al., 2015). Of the studies within K–12 contexts, few have collected data on the experiences and perspectives of school personnel with regard to this population (Jefferies & Dabach, 2014). As a result, we know little about the supports and barriers educators encounter in their efforts to meet the specific needs of undocumented students.

Educators have little policy to guide them in understanding their roles and responsibilities in working with undocumented children. The Supreme Court’s *Plyler v. Doe* (1982) decision established that this group does have a right to free K–12 public education. In addition, to prevent school actions from producing any sort of chilling effect that might prevent families from enrolling their children, schools are not permitted to require Social Security numbers or proof of legal residency. Beyond these broad parameters, however, schools have little guidance on how to ensure they provide a safe and inclusive learning atmosphere for these children while remaining within the bounds of the law. Ultimately, personnel typically resort to a “don’t ask, don’t tell” approach that hampers their ability to provide the supports students need (Jefferies & Dabach, 2014; Mangual Figueroa, 2011). The rise in xenophobic rhetoric and anti-immigration policies since the 2016 presidential campaign and election of Donald Trump have intensified fear and uncertainty among the undocumented population, children included, and make it ever more important that educators have guidance on how to ameliorate the stress their students are experiencing as a result of this sociopolitical climate.

Recent literature has illuminated the ways teachers can provide safe and welcoming environments for undocumented students, such as by building relationships and trust, providing resources and emotional supports, and using verbal and nonverbal signaling in the classroom (Dabach et al., 2018). Our study seeks to further the knowledge base regarding educators who wish to support and advocate for undocumented students by exploring three questions: How do these teachers perceive their roles and responsibilities as they relate to undocumented immigrant students? How do they fulfill these responsibilities and perform these roles? What supports and barriers have they encountered in attempting to fulfill these perceived responsibilities? By narrowing our case study to include only teachers actively working to support undocumented students, we gain a more comprehensive understanding of the existing opportunities for educators to integrate and advocate for these youth and of the supports and barriers they confront in doing so.

We chose Virginia as the location for this case study due to its rapidly growing new immigrant population and because of its relative lack of experience

and infrastructure that traditional gateway states (e.g., California, Texas, New York) have for receiving immigrants (Rong et al., 2011). As a result, states like Virginia have fewer detailed policies related to integrating newer immigrant families into communities and schools. We recruited teachers working in a metropolitan region considered a “new Latino destination,” meaning the Latino population growth exceeded 235 percent between 1980 and 2000 (Suro & Singer, 2002). In comparing school board regulations across states and school districts, we noticed that the region selected for the current study appeared to have fewer local policies regarding undocumented students, often leaving educators uncertain about what they are and are not allowed to do to support these youth. Given that over half of the nation’s one hundred largest metropolitan areas are considered new Latino destinations (Suro & Singer, 2002), we believe this is an important context to study. Educators in many of other metropolitan areas may be experiencing unclear policy contexts like those of the teachers in this study.

Background

Undocumented Immigrants in the United States and in Virginia

The concept of the “undocumented immigrant” is relatively new due to recently enforced federal immigration controls. The Immigration Reform and Control Act of 1986, passed during the Reagan administration, provided amnesty and legal status to the millions of people who were at that time living in the country without the required documentation. Since then, anti-amnesty positions have developed alongside a criminalization of unauthorized migration. The US government’s response to the September 11 attacks exacerbated this trend through the creation of US Immigration and Customs Enforcement (ICE), with its broad powers of deportation (Jefferies, 2014a; Jefferies & Dabach, 2014; Migration Policy Institute [MPI], 2013).

The last three decades have also seen a proliferation of misinformation about undocumented migrants stealing jobs, draining American resources without paying taxes, and committing crimes. In reality, undocumented immigrants commit fewer crimes than legal residents, and they do pay income taxes and contribute to Social Security, although they are ineligible to receive it and most other government benefits (Castro-Salazar & Bagley, 2010; Cisneros & Lopez, 2016). These are just a few examples of the widespread misconceptions fueled by inflammatory nativist rhetoric. These fallacies, in turn, contribute to supporting inhumane policies and practices, such as separating children, even infants, from their parents/guardians, a policy initiated by the Trump administration to deter immigration (Francis et al., 2018).

Despite growing immigration enforcement over the past few decades, high numbers of migrants, including asylum seekers and refugees, continue to arrive from the Northern Triangle of Central America (El Salvador, Honduras, and Guatemala). These groups include many unaccompanied minors and chil-

dren arriving in family units (Cohn et al., 2017; US Customs and Border Patrol [USCBP], 2019). Emigration from this area to Virginia has been particularly high; Virginia now ranks ninth in the country for its population of undocumented immigrants (MPI, 2014). Although exact numbers of undocumented immigrants are unavailable for the school districts relevant to this study, we did obtain Virginia Department of Education enrollment data showing that the English learner population doubled or tripled in each of these districts. While most English learners in the United States are not undocumented, the teachers we interviewed reported that many of their English learners were indeed undocumented and were often unaccompanied minors.

Policy Contexts

The two school districts in which all but one of our participating teachers worked had, at the time of the study, no school board policies, resolutions, or statements (that we were able to locate) related to serving undocumented students. In terms of state policy, teachers could reference the memo issued by the state superintendent of public instruction on March 1, 2017; however, only one of our participants was aware of this memo. The memo stated that “local school divisions have a constitutional and statutory obligation to provide education to K–12 students regardless of their immigration status, and to take active steps to guard the public education rights of students” (Staples, 2017, p. 1); that it is not a violation of immigration law or executive actions to provide “general information to families about their legal rights, and referrals to seek legal assistance if they need it” (p. 1); and that ICE officials must present a warrant before entering school grounds. The memo also recommended that school officials work with an immigration adviser to review any subpoenas before releasing student records and to develop a plan to respond to requests by immigration officials. These guidelines provided some information for teachers regarding their rights to support students. However, the memo was addressed to district superintendents, and the teachers we interviewed indicated that it did not appear to be disseminated to educators or immigrant families.

Undocumented Youth and Schools

Despite the intent of *Plyler* to prevent undocumented children from facing “a lifetime of hardship” (para. b), those who graduate from high school are nevertheless limited to predominantly low-wage jobs as a result of work eligibility requirements, disqualification from federal financial aid, and, in most states—including Virginia until only very recently—ineligibility for in-state college tuition rates (Gonzales et al., 2015; Jefferies, 2014b).¹ Their immigration status also prevents them from obtaining a driver’s license in many states, including Virginia (National Conference of State Legislatures [NCSL], 2020). For these reasons, many undocumented students, after becoming aware of the limited value a high school diploma holds for them, elect to leave school

early (Lopez, 2010). They often experience liminal citizenship; they do not feel they fully belong in their home country or in the United States (Torres & Wicks-Asbun, 2014).

A large proportion of undocumented immigrant students have experienced trauma and psychological stress associated with migration experiences, family separation or threat of separation, and family reunification (Gaytan et al., 2007; Rong et al., 2011). Although ICE issued a memorandum in October 2011 stating that schools are sensitive locations where arrests and interviews are prohibited, it added that there can be exceptions to this rule “when there is an immediate need for enforcement action” (Morton, 2011, p. 2). The fear resulting from the threat of deportation and distrust due to exploitation can prevent parents/guardians from advocating for psychosocial resources (Sudhinaraset et al., 2017) or better schooling conditions. Teachers are also hampered by the fear of exposing a child’s status, resulting in a “circle of silence” that promulgates existing misconceptions about undocumented youth (Jefferies, 2014a, p. 192). Because of these stresses and the fact that undocumented students disproportionately attend lower-resourced and lower-performing schools, “just 54 percent of undocumented youth have at least a high school diploma, compared to 82 percent of their U.S.-born peers,” and the college matriculation rate for undocumented student graduates is only 5–10 percent (US Department of Education [USDOE], 2015, p. 3).

It is important to recognize not only the ways schools are failing undocumented students but also the ways these youth display resilience and engage in political activism to improve their opportunities. Several studies have highlighted examples of undocumented youth organizing to fight for immigrant rights: the Development, Relief, and Education for Alien Minors (DREAM) Act, and in-state tuition legislation (Gonzales, 2008; Negrón-Gonzales, 2014; Parkhouse, 2017). In doing so, these youth enacted their agency when they made “a decision to abandon life on the margins and fight for a seat at the table” (Negrón-Gonzales, 2014, p. 275). In some cases, youth taught themselves how to lobby and other political strategies, skills that their school-based civic education failed to provide (Parkhouse, 2017). If more educators appreciated the resilience and political agency of undocumented students, they could broaden support for and participation in this collective resistance against subjugation.

School Professionals’ Perspectives on Teaching Undocumented Students

A growing body of research has illuminated undocumented students’ experiences in schools, including their navigations of citizenship education and decisions about whether, to whom, and how to disclose their status (Dabach et al., 2018; Gonzales et al., 2015; Mangual Figueroa, 2017; Negrón-Gonzales, 2014). However, few researchers have attempted to understand school conditions for these youth from the perspective of the educators attempting (or not attempting) to serve them.

Schools are positioned to integrate undocumented students into the community and provide “spaces of belonging that supersede legal citizenship” (Gonzales et al., 2015, p. 329). Teachers, counselors, and other school professionals can aid undocumented students by providing them with educational materials, emotional support, social networks, humanizing language, and a space to consider the implications of revealing their legal citizenship status and its relation to broader historical and political contexts (Castro-Salazar & Bagley, 2010; Mangual Figueroa, 2017). Gonzales, Suárez-Orozco, and Dedios-Sanguinetti (2013) found that undocumented students who “were able to maintain strong friendships or had caring adults (teachers, counselors, or other adult mentors) with whom they could talk openly about their struggles described less emotional distress and were much more likely to remain at school” (p. 1188).

However, schools often do not live up to their potential to moderate the stress arising from traumatic migration experiences, family separation, and anxiety about anti-immigrant policies and attitudes (Gallo & Link, 2016; Gonzales et al., 2015; Jefferies, 2014a, 2014b). Some school staff are unaware or unconvinced of their obligation to provide a safe and welcoming education for these youth (Lopez, 2010). Gallo and Link (2016) found some staff in the school they studied who believed they were mandated to report students’ disclosures about being undocumented:

Even though almost half of [the school’s] students were from immigrant families, no professional development had been offered to support teachers in how to navigate immigration status and schooling, *Plyler* and its implications for talking about undocumented status were not discussed, and teachers were left to their own devices. (p. 189)

Even among caring staff there is often still a “circle of silence” resulting from a fear that any discussion of status may put students at risk (Jefferies, 2014a). Moreover, teachers need training on how to ensure that their instruction does not inadvertently marginalize or silence these youth. Even assignments designed to promote inclusivity (e.g., having students describe their various family histories) may have the reverse effect if students are fearful of sharing aspects of their identity, such as their country of birth (Mangual Figueroa, 2017).

Some teachers, often on their own, have developed ways to support and advocate for these students. Jefferies and Dabach (2014) studied teachers who worked to normalize undocumented status by teaching appropriate terminology and announcing scholarship opportunities for undocumented youth broadly to the class rather than solely to eligible students. In another study, civics teachers used various strategies to promote safety and inclusivity in conversations about citizenship when citizenship status cannot be assumed (Dabach et al., 2018). To increase practitioners’ awareness and skills for working with undocumented students, some community and university organizations pro-

vide professional development for postsecondary educators through workshops like DREAMzone, UndocuAlly, and UndocuPeers (Cisneros & Lopez, 2016).

Method

Site and Study Design

For this study we employed a qualitative case study design, described as the “examination of a specific phenomenon in a bounded system” (Merriam, 1998, p. 9), to understand how teachers of immigrant students in one metropolitan region experiencing high undocumented immigration perceive and fulfill their roles and responsibilities as they relate to undocumented students. We selected this site because our work with teachers in the region revealed that many local educators were frustrated by the lack of guidance and support available to help them serve undocumented students. Our data consists of eighteen in-depth interviews conducted between July 2017 and March 2018. We used interviews as the primary data source because of our interest in educators’ perspectives, as opposed to their teaching practices or other phenomena that might be captured through observation or other data collection methods.

Participants: A Critical Case

We used purposeful and snowball sampling methods (Merriam & Tisdell, 2016) to recruit school professionals interested in sharing their perspectives on supporting undocumented students. We focused on the subset of teachers who were particularly concerned about this population of students because we felt they were likely to have given the most thought to how immigration status impacts students’ education and what role teachers can play. Thus, the findings from this study are not intended to be representative of the broader teacher community but instead serve as a critical case (Flyvbjerg, 2001); the supports and barriers these teachers identified are likely to hold true for teachers who may not be as actively thinking about undocumented students. Teachers not as attuned to these issues may not be as aware of existing policies, practices, and challenges. This critical case also offers insights into how existing education policy (or the lack thereof) related to immigration status shapes teacher actions and their effects on students.

We sent an email to the forty-six school professionals who attended a one-day UndocuAlly training cosponsored by a Latinx student university group and a local teacher advocacy group with which several of the coauthors were involved. This free, voluntary training was publicized primarily through the group’s website and listserv, the latter of which had, at the time, more than six hundred members representing various schools, content areas, and grade levels (see table 1). We then sought additional participants through snowball sampling. Although we had hoped to include educators of a variety of content

TABLE 1 *Participant demographics*

<i>Teacher</i>	<i>Gender</i>	<i>Position</i>	<i>Years in K–12 schools</i>	<i>Race/Ethnicity</i>
Anna	F	High school ESOL teacher	2.5	White
Brin	F	Middle school ESOL teacher	10	White
Caroline	F	Middle school Spanish teacher	2	Hispanic
Catherine	F	Elementary school ESOL teacher	20	White
Deborah	F	Elementary school special education teacher	27	White
Donna	F	Elementary school ESOL teacher	20	White
Evan	M	High school ESOL teacher	2	White
Jacob	M	Middle school ESOL teacher	1	White
Kelly	F	High school ESOL teacher	4	White
Maria	F	Elementary school ESOL teacher	12	Black/Hispanic
Molly	F	Middle school ESOL teacher	25+	White
Nicole	F	High school ESOL teacher	1.5	White
Olivia	F	Elementary school ESOL teacher	18	White
Prudence	F	Elementary school ESOL teacher	9 as a sub, 3 full time	Hispanic
Rachel	F	High school ESOL teacher	11	White
Stacy	F	Middle school ESOL teacher	15	White
Victoria	F	High school ESOL teacher	8	White

Source: All information reported was self-identified by participants through an open-ended demographic questionnaire.

areas, all but two of those who responded to our call were teachers of English for speakers of other languages (ESOL). The remaining two were a Spanish teacher and a special education teacher. We recognize that this homogeneity is a limitation of the study in that the responsibilities, supports, and barriers that teachers of other content areas might identify could be different from those identified by ESOL teachers. However, the fact that almost all who responded to our recruitment efforts were ESOL teachers also serves as a finding in itself: not only were ESOL teachers more likely to demonstrate concern and an interest in learning more about undocumented students, they were often the *only* teachers to do so.

All 18 interviews were conducted by Hillary Parkhouse or Virginia Massaro. Each interview was semi-structured and lasted between 30 and 90 minutes. We asked participants, for example: “Describe a few experiences you have had that made you more aware of the unique situations of undocumented students” and “What do you perceive to be some areas in which your school could improve in supporting undocumented students?” The first interview was conducted with both the first and second authors present to refine the interview protocol and ensure relative consistency across interviews. The first or second author separately conducted all remaining interviews. We concluded recruiting participants once saturation occurred in the data collection and we began to notice themes repeating (Merriam & Tisdell, 2016). Massaro transcribed the interviews.

Data Analysis

We collaborated in four phases of thematic analysis of the interview data (Braun & Clarke, 2012). During the first phase, we met to open-code two dissimilar transcripts line by line to develop an initial codebook. We collaboratively developed descriptions of each code to ensure that all researchers shared a common understanding of the codes. During the second phase, the remaining transcripts were coded by at least two researchers. In the third phase of analysis, the whole research team met to discuss hard-to-code quotations, revisions that we needed to make to the codebook, and initial ideas for conceptual themes and categories. During the fourth and final phase, we finalized themes, discussed counterexamples, and determined the ways findings confirmed, complicated, or challenged the existing literature. This collaborative analysis process, which has been referred to as “the interpretive zone” (Wasser & Bresler, 1996), placed our sometimes-divergent interpretations in conversation with each other to ultimately lead to deeper understanding. To further enhance the trustworthiness of the findings, we used member checking by sending an initial draft of the article to all participants for their feedback (Merriam & Tisdell, 2016).

Limitations

Our findings are not necessarily generalizable to K–12 public school teachers in other geographic locations, who may follow different policies or practices. Although we interviewed teachers until the point of data saturation, it is possible that including more participants could have surfaced other findings, particularly as the participants were almost all ESOL teachers and were all interested in educational equity for undocumented youth. Future researchers should seek perspectives of teachers in other disciplines—such as math, science, language arts, and social studies—to investigate how perceived responsibilities and supports may differ by content area. In addition, researchers could examine a different critical case, namely that of teachers who are *most* actively advocating for undocumented youth. Our methodological design and recruit-

ment strategy yielded teachers who were interested in better supports for undocumented youth, but not necessarily those most efficacious in providing that support. This is because we wanted to learn the range of interpretations teachers had regarding their responsibilities toward their undocumented students, as well as the barriers they faced. Another important area of research would be to look at the subset of teachers who are most successfully advocating for undocumented youth to determine what strategies they are finding most beneficial.

The interviewers, Parkhouse and Massaro, are both White, native English-speaking women born in the United States and working at a university, so their privileged social positions may have affected participants' responses in some cases. The interviewers attempted to build trust and rapport through sharing their prior experiences as K–12 educators of immigrant students. All four authors' personal experiences teaching English learners inspired our interest in this topic and gave us some preliminary sense of how neglected the topic of immigration status is within school discourses like professional development and school policies. Parkhouse and Massaro did not know most of the teachers prior to conducting the interviews, so teachers may have felt less comfortable than they would have otherwise. However, the lack of an existing relationship may also have helped respondents feel more anonymous and thus secure in disclosing sensitive information. Finally, most of the study's participants were White, US-born citizens who, as they expressed in interviews, had limited understanding of the US immigration system, much less firsthand experience navigating it. Future researchers might purposively recruit teachers of other backgrounds to investigate the ways various and intersecting dimensions of teachers' identities relate to their perceived roles and responsibilities regarding undocumented youth.

Findings and Interpretation

In general, the participating teachers interpreted their roles to extend beyond classroom instruction and to include providing students with emotional support, safe spaces within the school, and sometimes even basic needs. Some teachers also engaged in *adaptive advocacy*, actions intended to raise awareness of inequities for undocumented youth amid ever-changing sociopolitical contexts and intensifying xenophobia. However, the teachers' capacity for supporting their undocumented students was greatly constrained by unclear policy contexts, chilling school climates, and concerns about restrictions on political speech.

Perceived Roles and Responsibilities

Teachers reported a paradox: they had an ethical obligation to support students' specific needs, but they could not inquire about those needs if they pertained to immigration status. Whereas *Plyler* established a system in which

status is withheld from schools, the reality is that concealment is not always possible or even desirable, as knowledge of status often helps teachers better support their students.

Illuminating the extent of their role, one participant, Brin, said, “We’re so much more than teachers. I mean we’re social workers; we’re mediators.”² Another, Molly, noted, “My role that I’ve taken on is that kind of social worker, guidance counselor, you know, I speak Spanish. I call parents.” These broader roles involved the teachers’ sense of obligation to support students in ways that addressed their immigration status, such as providing information about college financial aid and immigration support services.

— Regarding Status Disclosure and Involvement

All of the participants were aware that schools are prohibited from asking families about immigration status. Rachel, however, felt that she could help her high school students navigate college decisions only if she knew their status, because their status impacted which funding sources were open to them and their eligibility for in-state tuition.³ She also recounted instances in which she could infer students’ status, such as by noticing missing Social Security numbers on forms. Stacy reported that attorneys contacted her to confirm that their clients’ children were attending school and to inquire about their grades as part of guardianship cases, necessary before moving forward with immigration proceedings. So, the question of whether or how teachers discovered students’ immigration status was more complicated than whether or not students chose to disclose it. These examples also illustrate ways in which the immigration and education systems are far more entangled than policy may suggest.

Another complicated question for the teachers was how involved they were in families’ attempts to secure authorized status. Most teachers seemed to feel as Olivia did, that “you can’t do something about whether they’re deported or not.” Brin, however, felt compelled to try to understand the system so that she could help families attain authorization. She was frustrated by what appeared to be a nonsensical system in which many students had to miss school for court dates and some students were able to obtain green cards while others were not. As a result of this frustration, she and her colleagues researched the immigration legal services the families were using and tried to learn more about how families could secure legal status. However, they were unable to get much clarity due to the fact that, as Brin noted, “it’s all so case-by-case specific.” Several other teachers told of their attempts to learn about immigration law but agreed that the complexities of the system hindered meaningful understanding.

— Providing Safe, Supportive Spaces

All of the teachers indicated a desire to provide a safe, reassuring, and inclusive place for students who had experienced trauma before and while migrating and who continued to live in a state of fear. Prudence described a day

when she announced it was time to go to lunch and a typically mild-mannered child “went into hysterics.” She discovered that the girl’s father had been deported the week before and that her mother had told her she would pick her up before lunch today. When her mother failed to arrive on time, the child assumed she had also been deported and cried, “Who am I going to go home to? They got my mommy. My daddy is gone. I have nowhere to go.”

Each teacher told stories that students and families shared about the violence they had witnessed or experienced in their home countries, about their journeys into the United States, and about their loss of loved ones to deportation. Olivia recounted:

A father of a first grader came rushing into the office and I was called up to talk to him. He was agitated and he said that ICE had come to his door before light. He answered the door and they rushed past him, took his wife out of bed, and immediately deported her to El Salvador. He, as a dishwasher who had to go to work at 12:00, was concerned that he had no place for his child to go after getting off the bus.

Brin told the story of one of her students who had been having panic attacks:

[She] and her brother were coming from Guatemala, and . . . they get on a boat and they came into Mexico. And they were walking on some gangplank and there was another woman holding her baby. The baby fell in the water . . . right in front of [the student]. The baby was gone.

Hearing the specific traumas their students had survived took a toll on the teachers. Nicole described the work as “emotional labor,” and Prudence lamented, “I am not emotionally strong enough to deal with the problems these kids have.” Nevertheless, the teachers felt they needed to know this background information about their students so that they could make more informed interpretations of their behaviors and decisions about the best means of supporting their education and well-being.

Fulfilling Perceived Responsibilities

Based on their self-defined roles with regard to undocumented students, the teachers took a variety of actions to fulfill the responsibilities of supporting families inside and outside of school. They sometimes provided basic needs and often designed units and lessons that their students could relate to and that would allow them to process some of the traumas they had experienced. They also took actions to advocate for their students, often independent of the school administrators, who were typically less vocal, perhaps due to concerns over political conflict.

— Provision of Basic Needs

The teachers took actions to ensure that students had basic needs like food, books, eyeglasses, transportation to and from school, school supplies, and

a safe space in school. Prudence recounted an instance when a mother was afraid to sign the forms necessary for receiving free eyeglasses for her son:

My very first year teaching I had a student who needed glasses. This kid got here all the way on a bike from Honduras with him and his mom. Broke his glasses on the way here . . . His mother would have to come in and sign forms for him to receive free glasses. She was too afraid . . . She would say, in Spanish, “I cannot come. I will be taken away.” I offered to come to her house. She goes, “That’s not where we really live. You cannot come to my house.” Finally, I was able to convince her [to] trust me enough [to] come here and fill this out.

Donna recalled how a parent kept her child home from school for two weeks because ICE had conducted a raid at a bus stop and thereafter the mother was afraid to walk her child there. Donna drove the child to school every day until the mother resumed taking her to the bus stop. Brin allowed students to color in her room during her planning periods just so that they could “feel like they’re doing something and that they are getting used to [the new school] system.” Stacy’s students felt “vulnerable” after Trump’s inauguration. Adding to their unease was the location of their classroom in a trailer that had only one small window in the door, which didn’t allow them to see who might come through the door. To help them feel more secure, Stacy assigned one tall student to be “the door woman, and she would look out the window before she opened the door,” only opening it if they recognized the visitor. She noted, “That’s a lot of responsibility for this twelve-year-old girl, but she did it and she seemed okay with that. She’s tall. She’s good at it. But how can we [as adults] do that *for* kids, right?”

— Status-Responsive Curriculum

Many of these teachers’ curricular decisions were driven by a desire to emotionally support undocumented students and to help them feel more connected to one another and to the school. For instance, Molly bought copies of Ann Jaramillo’s (2006) novel *La Línea* for her eighth graders. While reading about fifteen-year-old Miguel and his perilous journey from Mexico to California to reunite with his parents, several students told Molly, “Oh yeah, I did that” or “Oh, my uncle did that.” She said they looked forward to reading the book, adding that “they have very few opportunities in school to read about anything that makes sense to them.” Prudence helped students draw connections between their journeys to the US and those of other groups of immigrants throughout history. When we asked if the youth showed signs that reliving these experiences was painful for them, teachers replied similarly to Stacy: “I think it might have been a relief perhaps to talk about it.”

Occasionally, world events called for the teachers to pause their planned curriculum to address students’ anxieties and fears. One event many cited was the 2016 election. Stacy’s class had been engaging in weekly proactive circles led by a school counselor in which one question posed to the group was, “What

color is your mood?” “After the election,” she said, “the color changed. There were no more pinks and purples. It was grays and blacks.” Victoria designed a language lesson that served the dual purposes of allowing students to share their feelings about the election while also expanding their vocabulary. “I didn’t talk,” she explained, “because we were forbidden to talk about the election essentially.” Instead, she led an activity she called “Words That Help”:

They had a whole vocabulary list and then they had to, on a sticky note, write a word you like when you feel nervous or unsure. And then write it in English and Spanish . . . I gave them construction paper and they made little charts and I said, “You can write anything.” And one boy—and I still have it—he wrote this big paper that said, “Love people regardless.”

These examples demonstrate how the teachers we interviewed attempted to weave into their curriculum opportunities for students to forge connections, normalize the migration experience, and lighten the burden of guarding a secret.

— Adaptive Advocacy

Beyond classroom interactions with students, teachers advocated for them in a variety of ways, including providing contact information for legal and other assistance and pushing their administrators to create more inclusive school climates and their colleagues to be more sensitive. Yet, because political contexts were always in flux and ambiguous, their actions were often spontaneous and improvised responses to particular incidents. And while they found creative ways to support students, they lacked an understanding of what the law required of them.

Teacher autonomy due to an unclear policy context can be both a benefit and a limitation to ensuring that undocumented students are well supported. As “street-level bureaucrats,” teachers have discretion over how policy is ultimately delivered to the public (Weatherley & Lipsky, 1977). This was evidenced in a conversation with Nicole, who recounted receiving an email from administration telling them to remind parents that they need to show identification to visit the school. In response, Nicole asked, “While safety is my top concern as well, what about parents of students who don’t have that? What are we going to do?” (Several months after the email she had still not received a response.)

Participants indicated that opportunities for advocacy often arose during individual interactions with colleagues. All of them said that many of their colleagues showed empathy to undocumented families, yet most had also witnessed colleagues expressing anti-immigrant attitudes. Deborah noted that the staff at her school all used the term *illegal* and that “nobody uses the word *undocumented*. That’s too favorable.” In many cases, these teachers felt part of their responsibility was addressing insensitive comments and uncaring attitudes among their peers. Rachel encountered a counselor who told her, “Well,

I don't think they should be here," to which she responded, "Well, they're here and we're in school and they're children." Donna tried to explain to unsympathetic colleagues that undocumented or mixed-status families were "escaping from a life where they either were being persecuted or didn't have jobs or food or [that they] wanted to make a better life for their family—'Wouldn't you do the same?' That's usually what I'd say, you know, 'You would do it too for your family.'"

Another element of teachers' advocacy consisted of requests to building-level and sometimes district-level administrators. These did not result in much success, however. Prudence expressed that the only way she had gotten administrators' attention was to raise the possibility of lawsuits, since schools have a legal obligation to ensure that their students feel safe and protected.

The point that I've started bringing up to people that I've spoken to who are in positions of authority has been, "How far do we go until it's a legal repercussion?" And that's the only way I've been able to get anyone to respond. "This is a pending legal suit. What can we do?" And still [they say], "Oh, I don't know, what do you suggest?" [I reply,] "I'm not in charge here. Help *me*." So, they're not ready.

Molly had noticed that Denver Public Schools (2016) published a page on its website that included, in large font, "Immigration Rights FAQs" in ten different languages and the following statement from its "Safe and Welcoming School District" Board Resolution: "The district shall do everything in its lawful power to protect our students' confidential information and ensure that our students' learning environments are not disrupted by immigration enforcement actions." Molly wrote to her district ESOL specialist, and later to her superintendent, to ask if their district could publish a similar page to support undocumented families as they sought resources following Trump's election and given threats of mass deportations. But the response from both offices was that families know they can go to principals with these types of questions. Molly replied: "I don't agree with you, because not all principals believe the same thing. Not all families are comfortable speaking with principals, but if it was on the site, their kids could see it. They could explain it to them." She reported that the district community relations officer "said they would start a file. So, I started sending *Teaching Tolerance* [resources] and anything that I came across—'Note for your file, for your file, for your file.' So, I'm that little jabber."

These teachers described ways they continually adjusted their forms of advocacy to keep pace with ever-changing sociopolitical circumstances. Their experiences exemplify how advocacy for undocumented students is both adaptable to change as well as resourceful in the face of little or no guidance from school leadership. Teachers wishing to support immigrant students are left to improvise and rely on their instincts about the best actions to take in the face of additional barriers and limited resources.

Barriers and Supports

The interviews revealed an overwhelming number of barriers to fulfilling the obligations these teachers felt they had to their students. One major challenge was, as Victoria put it, feeling “isolated and alone” in this work. Many additional difficulties related to students’ English learner status and the inequities in education for those receiving ESOL services. However, here we focus only on barriers pertaining to undocumented status.

— Chilling School Climates

The teachers described a lack of support for undocumented youth at the school and district levels, which in effect violates the provision of *Plyler* that prohibits any school from creating a chilling effect that might deter undocumented families from sending their children to that school. For starters, no professional development or other interventions were provided to ensure that all school personnel knew their legal obligation to provide safe and supportive environments for undocumented students, including the fact that they have to cooperate with ICE only under certain conditions. And while the state superintendent’s memo to all school districts explicitly laid out this information, almost all of the teachers we interviewed said they were unaware of this memo or the policies it explained. One participant held the misconception that essentially “the gist” of the policy outlined in the memo was to “cooperate” with ICE. Thus, without a schoolwide shared understanding of their obligation to reduce chilling effects, individuals within the school often took actions that undermined this requirement. Examples of behavior the teachers reported included colleagues making insensitive or xenophobic comments and office staff mistakenly telling families they needed a Social Security number to enroll their children. Catherine recounted how a front desk staffer was unwilling to register a family who left their email address field blank, saying, “I don’t want to be wrapped up with anything like that!”—implying a fear of being an accomplice to a crime merely by registering an undocumented family. Olivia shared that her principal allowed a neighborhood group to put out a sign welcoming visitors in Spanish and Arabic, but the principal was told by the district to remove it for political reasons.

Some of the teachers thought their principals did not view the issue as a priority, and others were unsure where their administrators stood, perhaps because in their attempts to be apolitical they often avoided the topic. Deborah said, “I can’t really get a sense of how our principal feels about it. She’s, you know, she’s wise enough to not say anything.” Caroline said she would not share the status of her students with any administrators, regardless of their apparent support, because “we don’t know who we can trust at the end of the day.” Olivia described herself as “going undercover” to fulfill her responsibilities to students while also protecting her job.

This uncertainty about the trustworthiness of building leaders may have been fueled by school structures that disserved immigrant and multilingual

students. Kelly reported how important intercom announcements regarding safety were made only in English in schools with hundreds of Spanish speakers, leaving some students panicked about what information they missed. Other teachers had to wander the halls with their ESOL classes to find a space to work, leaving English learners feeling spatially and socially marginalized. Victoria explained, “I have to go to four different rooms on four different hallways through the hallways in a school that has 1,800 kids . . . so, there really isn’t time to have personal conversations with the kids.” The combined lack of time as well as a designated room where students could have private conversations with her restricted Victoria’s ability to serve as a resource for her students. She saw this as a reflection of the school’s failure to recognize this as an important need for undocumented students.

— Conflicting Expectations: Support Without Politics

Another obstacle for these teachers was the conflicting expectations that they should support students emotionally and socially but not take any political position. Several teachers said that their administrators mandated that they “stay neutral” and forbid them from talking about the presidential election. As a result, the teachers felt they had to suppress their agreement with students’ critiques of Trump’s policies and rhetoric as xenophobic. Donna decided that caring for her students compelled her to join in students’ denunciations of the president’s fearmongering and xenophobic rhetoric.

All they know of Trump is he wants to ship them to a country they’ve never been to. Or ship their families who are undocumented, because a lot of my students were born here . . . One was crying. . . I would let them talk. I probably wasn’t allowed to in the eyes of my administration, but I would let them talk. I didn’t want them to feel like they didn’t have someone besides their family who felt the same way . . . I guess I’m not the kind of person that can just say, “Go ahead and tell me how you feel,” and if Trump comes up, for me not to say something like, “I’m with you there.” You know? It’s just—I did want to hear their feelings, but I also wanted to let them know that I agreed with them.

Other teachers, particularly those newer to the profession, were more cautious. When we asked Nicole—who had been teaching full time for less than a year—about barriers to her ability to support undocumented youth, the only obstacle she identified was her fear of being perceived as “proselytizing” or engaging in political indoctrination. She showed one student the American Civil Liberties Union (ACLU) home page, where resources for undocumented immigrants appeared in multiple languages, but did not print it out because “it is definitely a political organization . . . I think that that could be viewed as proselytizing.” Thus, some teachers limited their supportive acts to those they could be sure would not risk breaching the district’s limits on political speech.⁴ Several participants also believed that part of the reason more of their colleagues were not allies to undocumented students was their fear of being viewed as engaging politically.

Some teachers, however, decided to risk disciplinary action or even job loss to explicitly condemn xenophobic political rhetoric. Olivia gave families the phone number for the Legal Aid Justice Center, explaining:

I don't see that as a political thing, I see that as the same as when the counselor says, "You've got this issue. Here's the number to social services or here's the number to a counselor" . . . I just see it as one of many services that the community provides that should be brought up, and I'm just very disappointed that I've had to go undercover to do things.

Similarly, Olivia left ACLU pamphlets with a parent who owned a *tienda*, asking him to leave them out for people to take. She then cohosted an information session for parents with the Legal Aid Justice Center at another ESOL teacher's house, without the knowledge of her administrator.

— Supports

We asked participants to name any supports they had in their work with undocumented students, but most could name one or two at most. The majority of the teachers indicated they received little to no professional development on the subject beyond the independent UndocuAlly workshop (for those participants who had attended it). No similar training was sponsored by the school districts, further bolstering the teachers' claim that administrators failed to provide the information they needed. In terms of finding other resources to support families, participants largely echoed Catherine: "There's some information that I can get from the family liaison for [my school district], but she's one person for all these families. So, honestly, I don't really know much about what's available around here." A few mentioned online resources they found, such as a list of scholarships that undocumented students are eligible for. The fiancé of one participant happened to be an immigration attorney, and he was able to answer some of her questions. Otherwise, teachers were largely educating themselves using whatever resources they could find and then developing their own strategies. This is another way in which they demonstrated improvised advocacy. In contexts of numerous barriers and limited support, the teachers necessarily had to employ approaches to advocacy and assistance that were resourceful, creative, and adaptive. Nevertheless, all participants, including those who knew a great deal about the immigration system and this population of students, expressed a strong desire for more leadership and professional development on this issue.

Discussion and Implications

This study contributes to the small but growing body of literature that examines how the promise of *Plyler v. Doe*—to guarantee to undocumented children the social, civic, and economic opportunities that schools are intended to provide—has yet to be realized (Gonzales et al., 2015). It highlights ways the

lack of clear policy and effective dissemination constrain teachers' abilities to understand what is permissible in their efforts to provide more inclusive and equitable education for their undocumented students. In some cases, the lack of clarity and the poor dissemination have led to misconceptions about policy that disserve students. At least one teacher mistakenly believed that the gist of the superintendent memo was to cooperate with ICE, and a front desk staffer reportedly worried that registering an undocumented child for school would incriminate her. In other cases, teachers withheld information they could have provided families out of a narrow interpretation of the policy.

It is important to keep in mind that almost all the participating teachers taught ESOL and as a result worked with more immigrant students than most teachers do. Therefore, they likely had more knowledge of immigration issues and perhaps a more developed personal sense of duty to support undocumented students. Few teachers of other areas responded to our recruitment efforts, suggesting that perhaps those teachers are less attuned to issues of undocumented youth education. As a result, the responsibilities identified by the study participants may not even be on the radar of a large proportion of teachers. As such, school districts should consider the possibility that many of their staff are not seeking more support in this area because they do not know what supports they lack or are unaware that schools are obligated to provide a safe and inclusive education for undocumented students.

Because of the limited acknowledgment of that obligation, the teachers we interviewed felt alone and vulnerable to censure, or even firing. Like Gallo and Link (2016), we found that teachers were largely "left to their own devices" (p. 189) when working with undocumented students. Some teachers provided resources to families without informing their administrators, using a logic of "it's better to ask forgiveness than permission" when they could not be sure if their actions were permitted.

The guarantee of education provided through *Plyler v. Doe* "comes at the price of invisibility" (Mangual Figueroa, 2011, p. 263). The interviews we conducted highlight ways the teachers—in their efforts to ensure that undocumented students received the attention they deserved—had to keep their actions hidden due to uncertainty about what existing policy does and does not allow. In other cases, teachers' efforts were ignored, which in turn reinforced students' invisibility. For instance, when one teacher urged the school district to post on its website information for undocumented families, her efforts were repeatedly disregarded.

At the same time, these teachers invented means of creating safe and welcoming environments for undocumented students and carried out their understanding of what the law mandates. They used their autonomy and power as "street-level bureaucrats" to enact their interpretation or knowledge of policies using whatever limited resources they had (Weatherley & Lipsky, 1977). However, their discretion and agency were limited in many ways. Their fear of violating rules and their doubts about the extent of their autonomy proved to

be additional hindrances to ensuring that undocumented students were well supported.

A lack of understanding of the law and ambiguous policy limit widespread teacher awareness and thereby student access to existing supports and resources for this vulnerable population. We do not argue for additional policy mandating particular teacher actions. In fact, the autonomy afforded by nonspecific policy allows teachers to adapt their responses to their particular students and contexts. However, we do believe the requirement that schools be safe and welcoming needs greater consideration and enforcement at the district, school, and classroom levels. It should not be the case that some districts provide helpful information to immigrant families about the schools' abilities to protect children's confidential information and access to learning while others remain silent and even harbor unwelcoming staff. While the policy leaves open the question of *how* to be safe and welcoming, the expectation that schools meet this standard is clear and needs to be emphasized to staff at all levels. States must ensure that districts understand this standard and advise on how to meet it, including, for instance, posting information on websites and offering professional development to all school personnel.

School leaders need training on how to ensure a school environment that is inclusive and welcoming to undocumented students. Like teachers, many principals are uncertain about what actions are permitted. In some cases, administrators avoid making schoolwide policies because their staff or communities have strong and conflicting political views about immigration (Jefferies, 2014a). Those administrators in particular need to be made aware that existing policy serves as justification for actions such as posting welcome signs in students' home languages or providing immigration resources to families. We recommend that leaders at all levels receive training about the costs of failing to make their schools safe and welcoming, which include unnecessary absences when ICE raids occur in the community and children not receiving eye exams and special education services. They should receive training on the specific supports and information they can and should provide to families (e.g., district and school websites in multiple languages).

Administrators also need training on what school staff are allowed to do and on how to ensure a clear understanding of their roles and responsibilities. Administrators need to know their rights regarding issues like advocating for families and interacting with immigration officials. They also need to make sure staff are aware of their rights and know where to go for additional information. Staff need to know—and be reassured—that if a student chooses to disclose status, the staff member has not committed an offense and is not obligated to report this information.

This study reveals how knowledge of students' status often allows teachers to better serve them and how disclosure of status is not as straightforward as policy language might suggest. In addition, there may be an erroneous assumption that because staff are not to ask about status, they should therefore act

as though all students are documented. In fact, status consciousness—or critical awareness of the ways in which undocumented status and ethnocultural differences are linked to educational inequities—helped sympathetic teachers in our study better support undocumented students. Status consciousness allowed them to better understand students' material and emotional needs and how to meet them (e.g., through providing safe spaces and even basic needs such as transportation to school). It also increased the likelihood of families receiving information about community resources, such as legal aid. Finally, and perhaps most importantly, the findings show how teachers' normalization of undocumented status can counter school climates and societal discourses that marginalize and dehumanize these youth (see also Jefferies & Dabach, 2014).

All school personnel need training on the history of undocumented immigration to the United States of different ethnocultural groups and the ways educators can normalize undocumented status so that students are not made to feel invisible and that they do not belong. They need strategies for navigating changing political contexts, particularly as undocumented students have multidimensional identities where race/ethnicity, socioeconomic status, and native languages intersect and often collide with systems of power (Jaffe-Walter et al., 2019). In addition, teachers need access to status-responsive curriculum, such as literature that can help undocumented students see themselves represented and that offers a means of processing emotionally challenging and even traumatic experiences, with the support of school counselors and social workers. For school personnel who hold anti-immigrant views, training should be provided (and mandated) so that they know their legal obligation to be welcoming and fair to all students. Training alone is insufficient to realize the potential of *Plyler* to ensure equitable education for undocumented students; however, it is one element of the multipronged approach that is needed.

To that end, teachers need to know where they can send students who have experienced trauma, sudden changes to living situations, or other experiences that may impact their mental health and emotional well-being. School counselors and social workers need to be trained in policies and support strategies specific to this population. Parallel supports need to be established for educators struggling with the emotional labor of supporting students affected by trauma. Lawson, Caringi, Gottfried, Bride, and Hydon (2019) argue that this secondary traumatic stress (STS), if untreated, can lead to depression, disengagement, and even leaving the profession.

Perhaps compounding the effects of STS is that teachers like those in our study are largely alone in their improvised efforts to support undocumented students. They also put themselves at risk by taking actions they are not sure school administrators permit. For instance, teachers we interviewed were uncertain about how much they could reveal of their own political leaning when expressing empathy for students' election-related fears, or whether they could share information about students' academic progress with attorneys

who requested it. District and school policies around political speech need to be clearer and better disseminated so that educators do not have to over-censor themselves and potentially withhold much-needed empathy and support.

Our recommendations move schools toward creating the climates of support needed for undocumented students to feel truly safe and welcome, as the *Plyler* decision intended. In such a school, *all* educators and staff are expected to actively support undocumented students, and there are opportunities for teachers to share resources and knowledge as well as emotional support for this work. As a result, educators will feel less alone, vulnerable, and worried about whether they are “proselytizing” or otherwise violating rules. In such an environment, ideally, teachers will feel protected and therefore more empowered to do what is best for their students.

Conclusion

This study expands the literature base on how schools can better serve undocumented students to fulfill the legal requirements of *Plyler*—namely, to promote civic participation and upward social mobility that applies equally to all students regardless of immigration status. The findings reveal the many ways teachers interpret policies that are not always clear or widely disseminated to them and then improvise as they strive to support their students. Whereas earlier studies show how a lack of status consciousness could hamper teachers’ supportiveness (Gallo & Link, 2016), this study shows how even status-conscious teachers actively seeking information often struggle to find clarity on policies related to both immigration and its relationship to education. These teachers face additional obstacles, including the lack of administrative guidance, prejudices of colleagues, and an inability to achieve sufficient understanding of their students’ situations given the incomprehensibility of immigration procedures. For the participants in our study, the lack of policy guidance to school districts exacerbated these issues, because the teachers were not sure whether school and district-level administrators shared their interpretation of what actions were permissible in regard to creating safe and welcoming environments.

Given that school staff ultimately are the ones to determine how these policies are implemented, school systems need to ensure that *all* personnel—principals, front desk staff, counselors, bus drivers, school resource officers, and others—know how they can support undocumented students, what to do in the case of local ICE activity, and what resources they can direct families to. Teacher education and education leadership programs can also do their part to make this information available as widely as possible. Ultimately, more conversations are needed on immigration status and its impact on education to reduce educators’ feelings of isolation, insecurity, and the need to “go undercover” and the consequent deleterious effects on guaranteeing inclusive and humanizing education for undocumented students.

Notes

1. In April 2020 Virginia governor Ralph Northam signed into law a bill that grants in-state tuition to undocumented students (SB 935, 2020).
2. All participant names are pseudonyms.
3. At the time of the interviews, in Virginia in-state tuition was available to DACA recipients but not undocumented students.
4. The districts' policies on political activity essentially stated that employees could not use school time or property for partisan political purposes. Our participants displayed a range of interpretations of what precise actions this prohibited, particularly around supporting undocumented students, which they worried could be perceived as a partisan political issue.

References

- Braun, V., & Clarke, V. (2012). Thematic analysis. In H. Cooper, P. M. Camic, D. L. Long, A. T. Panter, D. Rindskopf, & K. J. Sher (Eds.), *Research designs: Quantitative, qualitative, neuropsychological, and biological* (pp. 57–71). Washington, DC: American Psychological Association.
- Castro-Salazar, R., & Bagley, C. (2010). “Ni de aquí ni from there”: Navigating between contexts: Counter-narratives of undocumented Mexican students in the United States. *Race Ethnicity and Education*, 13(1), 23–40. doi:10.1080/13613320903549651
- Cisneros, J., & Lopez, A. (2016). DREAMzone: Educating counselors and human service professionals working with undocumented students. *Journal for Social Action in Counseling & Psychology*, 8(2), 32–48. doi:10.33043/JSACP.8.2.32-48
- Cohn, D., Passel, J. S., & Gonzalez-Barrera, A. (2017, December 7). Rise in U.S. immigrants from El Salvador, Guatemala, and Honduras outpaces growth from elsewhere. *Pew Research Center: Hispanic Trends*. Retrieved from <http://www.pewhispanic.org/2017/12/07/rise-in-u-s-immigrants-from-el-salvador-guatemala-and-honduras-outpaces-growth-from-elsewhere/>
- Dabach, D. B., Fones, A., Merchant, N. H., & Adekile, A. (2018). Teachers navigating civic education when students are undocumented: Building case knowledge. *Theory & Research in Social Education*, 46(3), 331–373. doi:10.1080/00933104.2017.1413470
- Denver Public Schools. (2016, November 15). *Immigration rights FAQ (Updated)*. Retrieved from <https://www.dpsk12.org/responding-to-immigration-concerns/>
- Flyvbjerg, B. (2001). *Making social science matter: Why social inquiry fails and how it can succeed again*. Cambridge, UK: Cambridge University Press.
- Francis, W., Wachendorfer, A., & Wilson, M. (2018). *Migrant and asylum-seeking families: Analysis of federal government policies and procedures*. Washington, DC: National Association of Social Workers. Retrieved from <https://www.socialworkers.org/LinkClick.aspx?fileticket=nh8m0yWK1Zg%3D&portalid=0>
- Gallo, S., & Link, H. (2016). Exploring the borderlands: Elementary school teachers' navigation of immigration practices in a new Latino diaspora community. *Journal of Latinos and Education*, 15(3), 180–196. doi:10.1080/15348431.2015.1099531
- Gaytan, F. X., Carhill, A., & Suárez-Orozco, C. (2007). Understanding and responding to the needs of newcomer immigrant youth and families. *Prevention Researcher*, 14(4), 10–14.
- Gonzales, R. G. (2008). Left out but not shut down: Political activism and the undocumented student movement. *Northwestern Journal of Law and Social Policy*, 3, 219–239.
- Gonzales, R. G., Heredia, L. L., & Negrón-Gonzales, G. (2015). Untangling Plyler's legacy: Undocumented students, schools, and citizenship. *Harvard Educational Review*, 85(3), 318–341. doi:10.17763/0017-8055.85.3.318

- Gonzales, R. G., Suárez-Orozco, C., & Dedios-Sanguinetti, M. C. (2013). No place to belong: Contextualizing concepts of mental health among undocumented immigrant youth in the United States. *American Behavioral Scientist*, 57(8), 1174–1199. doi:10.1177/0002764213487349
- Jaffe-Walter, R., Miranda, C. P., & Lee, S. J. (2019). From protest to protection: Navigating politics with immigrant students in uncertain times. *Harvard Educational Review*, 89(2), 251–276. doi:10.17763/1943-5045-89.2.251
- Jaramillo, A. (2006). *La línea*. New York: Macmillan.
- Jefferies, J. (2014a). Fear of deportation in high school: Implications for breaking the circle of silence surrounding migration status. *Journal of Latinos and Education*, 13(4), 278–295. doi:10.1080/15348431.2014.887469
- Jefferies, J. (2014b). The production of “illegal” subjects in Massachusetts and high school enrollment for undocumented youth. *Latino Studies*, 12(1), 65–87. doi:10.1057/lst.2014.5
- Jefferies, J., & Dabach, D. B. (2014). Breaking the silence: Facing undocumented issues in teacher practice. *Association of Mexican American Educators Journal*, 8(1), 83–93.
- Lawson, H. A., Caringi, J. C., Gottfried, R., Bride, B. E., & Hydon, S. P. (2019). Educators’ secondary traumatic stress, children’s trauma, and the need for trauma literacy. *Harvard Educational Review*, 89(3), 421–447. doi:10.17763/1943-5045-89.3.421
- Lopez, J. K. (2010). *Undocumented students and the policies of wasted potential*. El Paso, TX: LFB Scholarly.
- Mangual Figueroa, A. (2011). Citizenship and education in the homework completion routine. *Anthropology & Education Quarterly*, 42(3), 263–280. doi:10.1111/j.1548-1492.2011.01131.x
- Mangual Figueroa, A. (2017). Speech or silence: Undocumented students’ decisions to disclose or disguise their citizenship status in school. *American Educational Research Journal*, 54(3), 485–523. doi:10.3102/0002831217693937
- Merriam, S. B. (1998). *Qualitative research and case study applications in education*. San Francisco: Jossey-Bass.
- Merriam, S. B., & Tisdell, E. J. (2016). *Qualitative research: A guide to design and implementation* (4th ed.). San Francisco: Jossey-Bass.
- Migration Policy Institute [MPI] (2013, March). *Major US immigration laws, 1790–present*. Retrieved from <https://www.migrationpolicy.org/research/timeline-1790>
- Migration Policy Institute [MPI] (2014). *Profile of the unauthorized populations: Virginia*. Retrieved from <https://www.migrationpolicy.org/data/unauthorized-immigrant-population/state/VA>
- Morton, J. (2011, October 24). Enforcement actions at or focused on sensitive locations. Policy number: 10029.2. Memorandum from the Director, U.S. Office of Immigration and Customs Enforcement. Retrieved from <https://www.ice.gov/doclib/ero-outreach/pdf/10029.2-policy.pdf>
- National Conference of State Legislatures. (2020). *States offering driver’s licenses to immigrants*. Retrieved from <https://www.ncsl.org/research/immigration/states-offering-driver-s-licenses-to-immigrants.aspx>
- Negrón-Gonzales, G. (2014). Undocumented, unafraid and unapologetic: Re-articulatory practices and migrant youth “illegality.” *Latino Studies*, 12(2), 259–278. doi:10.1057/lst.2014.20
- Parkhouse, H. (2017). Lessons on citizenship and democratic power literacy from undocumented youth. *Critical Education*, 8(5), 1–19. doi:10.14288/ce.v8i5.186125
- Passel, J. S., & Cohn, D. (2016, November 17). *Children of unauthorized immigrants represent rising share of K–12 students*. Pew Research Center. Retrieved from <http://www.pewresearch.org/fact-tank/2016/11/17/children-of-unauthorized-immigrants-represent-rising-share-of-k-12-students/>

- Plyler v. Doe*, 457 US 202 (1982).
- Rong, X. L., Dávila, L. T., & Hilburn, J. (2011). Working with immigrant children of “undocumented” and “mixed” families. In B. S. Fennimore & A. L. Goodwin (Eds.), *Promoting social justice for young children* (pp. 93–109). New York: Springer. doi:10.1007/978-94-007-0570-8_9
- SB 935, 2020 Biennium, 2020 Reg. Sess. (Vir. 2020).
- Staples, S. R. (2017, March 1). *Guidance regarding school division responsibilities and actions under the law in reference to students and immigration* (Superintendent’s Memo #059-17). Commonwealth of Virginia Department of Education. Retrieved from http://www.doe.virginia.gov/administrators/superintendents_memos/2017/059-17.shtml
- Sudhinaraset, M., Ling, I., To, T. M., Melo, J., & Quach, T. (2017). Dreams deferred: Contextualizing the health and psychosocial needs of undocumented Asian and Pacific Islander young adults in Northern California. *Social Science & Medicine*, 184, 144–152. doi:10.1016/j.socscimed.2017.05.024
- Suro, R., & Singer, A. (2002). *Latino growth in metropolitan America: Changing patterns, new locations*. Washington, DC: Brookings Institution, Center on Urban and Metropolitan Policy, Pew Hispanic Center.
- Torres, R. M., & Wicks-Asbun, M. (2014). Undocumented students’ narratives of liminal citizenship: High aspirations, exclusion, and “in-between” identities. *The Professional Geographer*, 66(2), 195–204. doi:10.1080/00330124.2012.735936
- US Customs and Border Protection [USCBP]. (2019, March 5). *CPB releases fiscal year 2019 southwest border migration stats: Agency experiences record number of apprehensions/inadmissible family units*. Retrieved from <https://www.cbp.gov/newsroom/national-media-release/cbp-releases-fiscal-year-2019-southwest-border-migration-stats>
- US Department of Education [USDOE] (2015, October 20). *Resource guide: Supporting undocumented youth*. Retrieved from <https://www2.ed.gov/about/overview/focus/supporting-undocumented-youth.pdf>
- Wasser, J. D., & Bresler, L. (1996). Working in the interpretive zone: Conceptualizing collaboration in qualitative research teams. *Educational Researcher*, 25(5), 5–15. doi:10.3102/0013189X025005005
- Weatherley, R., & Lipsky, M. (1977). Street-level bureaucrats and institutional innovation: Implementing special-education reform. *Harvard Educational Review*, 47(2), 171–197. doi:10.17763/haer.47.2.v870r1v16786270x

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