

Impact of Administrative Burdens on Undocumented Youth Access to Higher Education and  
Benefits from In-State Resident Tuition

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# **Impact of Administrative Burdens on Undocumented Youth Access to Higher Education and Benefits from In-State Resident Tuition**

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## **ABSTRACT**

In the United States, some states and higher education institutions allow undocumented students to pay in-state resident tuition at public colleges and universities. Yet, when undocumented youth apply and seek to qualify for in-state tuition, they find bureaucratic procedures and rules that may discourage them from applying at all, delay, or hamper their access to higher education. The study explores how such bureaucratic requirements impose learning, compliance, and psychological burdens on undocumented youth. Building upon administrative burdens scholarship and using qualitative and quantitative analyses of admissions applications at the institutional level, undocumented students reports' of their experiences, and surveys of college admissions officers, this study examines the admissions requirements and other factors that may shape the applications of undocumented students to colleges in the states providing ISRT benefits for undocumented youth. The findings suggest that undocumented youth navigate multifaceted institutional contexts across and within states, including requirements and rules at different organizational levels and interactions with admissions officers whose discretion may facilitate or obstruct access. Variations in ISRT requirements reflect states' patterns of immigration, demographics, political (sub) cultures, narratives about the deservingness, organizational factors as well as the discretion that college personnel has in applying the requirements. Findings suggest that factors associated with residency, notarized affidavits, tax forms, and lack of clear information and guidance from college personnel substantially increase burdens when undocumented youth seek to benefit from ISRT. Certainly, when states, institutions, and admissions officers establish and shape ISRT requirements, they implicitly influence the sense of belonging and membership of undocumented applicants and mediate intergovernmental tension surrounding legalization and inclusion of this population in society.

**Impact of Administrative Burdens on Undocumented Youth Access to Higher Education  
and Benefits from ISRT**

**Andrea Briceno Mosquera**

**GENERAL AUDIENCE ABSTRACT**

Bureaucratic requirements and rules at some public colleges and universities in the United States may hamper the ability of undocumented immigrants to apply for admission and qualify for in-state resident tuition in the states and colleges that allow it. This study explores how such bureaucratic requirements impose learning, compliance, and psychological burdens on undocumented youth and the factors associated with such burdens. The study examines admissions applications in community colleges in the states where the benefit is available, interviews and surveys with undocumented youth as well as surveys of colleges admissions officers. The findings show that the administrative burdens that undocumented youth faces result from requirements and rules that overlap at different organizational levels, several policy interpretations, the intertwine between immigration and higher education policies, perceptions of such population's deservingness, and the discretion of admissions officers. Through these requirements, states and colleges shape the sense of belonging of immigrant youth and chart their legal and social inclusion.

## **DEDICATION**

To God, who has been a way maker and a promise keeper in my life. You are the one who brought me here, who miraculously opened doors for me, and who has put such wonderful people in my path. You are the one who holds me every day.

To my mom, who has always been here for me. I would not be here without you. If there is someone who deserves any recognition or degree, that is you. Thank you for praying for me, for crying with me, for supporting me emotionally and financially, for frequently assuming my house chores, and sharing the responsibility of caring for my kids. Thank you for your example of faith and steadfast perseverance. Thank you because when I have felt worthless and without a doctorate level, you have had faith in me, and you have lifted me up.

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## TABLE OF CONTENTS

CHAPTER ONE .....	1
INTRODUCTION .....	1
Undocumented Youth and In-State Resident Tuition Policy .....	5
Core Scholarship .....	10
Administrative Burdens and College Application .....	12
Data and Methods.....	14
Research Design Scope .....	15
Overview of Chapters.....	16
Strategic Inquiry .....	17
Note on Terminology .....	19
CHAPTER TWO .....	21
IMPLEMENTATION OF IN-STATE RESIDENT TUITION POLICY FOR UNDOCUMENTED STUDENTS .....	21
In-State Resident Tuition Policy at the State Level .....	22
Role of Higher Education Institutions .....	26
Factors Influencing ISRT Availability and Implementation.....	30
□ <i>Demographic and Location</i> .....	30
□ <i>Political Culture</i> .....	32
□ State Political Partisanship.....	37
□ Perceptions of Deservingness Based on Innocence and Belongingness.....	38
Conclusions .....	42
CHAPTER THREE .....	46
IMPACT OF ADMINISTRATIVE BURDENS ON UNDOCUMENTED STUDENTS’ ACCESS TO POSTSECONDARY EDUCATION.....	46
Abstract .....	46
Introduction .....	47
When Administrative Burdens Hamper Receipt of Public Benefits .....	50
When Undocumented Students Apply for College and Claim In-State Tuition.....	54
Research Context and Design .....	58
□ Community Colleges as Unit of Analysis.....	58
Data Description.....	65



Hypothesis results .....	68
Limitations .....	75
Conclusion.....	77
CHAPTER FOUR.....	80
ADMINISTRATIVE BURDENS WHEN UNDOCUMENTED STUDENTS APPLY TO COLLEGE AND CLAIM ISRT .....	80
Abstract .....	80
Introduction .....	81
Individual Experiences of Administrative Burdens .....	84
Research Design.....	91
Data Description.....	92
□ Interviewees .....	92
Survey Respondents.....	96
Results .....	101
Learning Burdens .....	102
Compliance Burdens.....	108
Psychological Burdens.....	119
Limitations .....	143
Conclusion.....	144
CHAPTER FIVE .....	149
HOW ADMISSIONS OFFICERS PERCEIVE ADMINISTRATIVE BURDENS WHEN UNDOCUMENTED STUDENTS APPLY FOR COLLEGE.....	149
Abstract .....	149
Introduction .....	150
Factors Influencing the Role of Street-Level Bureaucrats in Policy Implementation ..	153
The Role of Admissions Officers in ISRT Implementation.....	157
Factors Influencing Admissions Officers.....	161
Hypotheses .....	165
Research Design.....	166
Data Description.....	172
Admissions Officers' Recommendations.....	185
Limitations .....	190
Conclusions .....	191

CHAPTER SIX.....	195
CONCLUSIONS.....	195
EVIDENCE AND IMPLICATIONS FOR PUBLIC ADMINISTRATION .....	195
State and Institutions Implementing ISRT Requirements.....	197
Deservingness Based on Belonging to a State/Locality .....	199
Experiences of Undocumented Youth.....	202
Perceptions of Admissions Officers.....	204
Administrative Burdens as Consequential .....	206
Requirements and Bureaucratic Procedures Mediate Immigration Status .....	210
RECOMMENDATIONS .....	212
LIMITATIONS .....	213
FUTURE RESEARCH .....	215
WORK CITED.....	218
APPENDICES .....	247
APPENDIX A. ....	247
IN-STATE TUITION AND FINANCIAL AID FOR UNDOCUMENTED IMMIGRANTS BY STATE AND YEAR (NCSL 2021).....	247
APPENDIX B. ....	256
PUBLIC COLLEGES AND STATE UNIVERSITIES SYSTEMS OFFERING IN-STATE TUITION BY STATE AND YEAR .....	256
APPENDIX C. ....	259
STATES BARRING OR LIMITING IN-STATE TUITION BENEFITS FOR UNDOCUMENTED STUDENTS BY STATE AND YEAR .....	259
APPENDIX D. ....	261
SAMPLE OF COMMUNITY COLLEGES LOCATED IN STATES OFFERING IN-STATE TUTION .....	261
APPENDIX E.....	272
CODING OF ADMISSIONS REQUIREMENTS .....	272
APPENDIX F.....	280
DESCRIPTIVE STATISTICS ADMINISTRATIVE BURDENS .....	280
APPENDIX G. ....	281
CORRELATIONS BETWEEN ADMISSIONS REQUIREMENTS .....	281
APPENDIX H. ....	282

UNDOCUMENTED STUDENTS SURVEY.....282

APPENDIX I.....293

RECOMMENDATIONS FROM UNDOCUMENTED PARTICIPANTS .....293

APPENDIX J.....297

ADMISSIONS OFFICERS’ PERCEPTIONS OF USEFULNESS OF THE  
COLLEGE WEBSITE INFORMATION .....297

APPENDIX K. ....298

ADMISSIONS OFFICERS’ PERCEPTIONS OF THE IMPORTANCE OF  
ADMISSIONS REQUIREMENTS .....298

APPENDIX L.....299

ADMISSIONS OFFICERS’ PERCEPTION OF DESERVINGNESS.....299

APPENDIX M.....301

COMPLEMENTARY QUANTITATIVE ANALYSIS OF ADMISSIONS  
OFFICERS SURVEYS .....301

APPENDIX N. ....306

STANDARDIZED VS. PARTICULARIZED ADMISSIONS PROCESSES .....306

APPENDIX O. ....317

RECOMMENDATIONS REGARDING ADMISSION PROCESSES FOR  
UNDOCUMENTED STUDENTS.....317

## **CHAPTER ONE**

### **INTRODUCTION**

In the United States, undocumented youth are legally entitled to free public education from kindergarten through 12<sup>th</sup> grade. Yet, when they try to gain access to higher education, they face numerous legal and financial barriers (Abrego 2006; Abrego and Gonzales 2010; Bjorklund 2018; Serna et al. 2017; Terriquez 2015). Scholars consistently find that financial barriers are the primary reason undocumented students do not attend college (Bjorklund 2018; Nienhusser 2014; Terriquez 2015; Serna et al. 2017). Although no federal law prohibits undocumented individuals from going to college, they do not qualify for federal financial aid (Diaz-Strong et al. 2011; Gildersleeve et al. 2010). Since the federal poverty rate for undocumented households is nearly 40% (Passel, 2005), financial aid is crucial to their access to higher education. At the state level, a patchwork of state and institutional policies extends or limits opportunities for undocumented youth to pursue higher education. The availability of in-state resident tuition (ISRT), which permits undocumented youth who have studied in a state school for two to three consecutive years and have graduated from it, to pay lower tuition rates at state-funded institutions (Gonzales 2011), is perhaps the most relevant policy of the last two decades related to the ability of undocumented youth to attend college.

Nonetheless, enrollment rates following enactment of ISRT have increased by an average of 2.5-4.0 percent (Amuedo-Dorantes and Sparber 2014), considerably less than what would be expected based on enrollment rates of subsidized citizen youth through reduction of tuition or provision of financial aid (Dynarski 2002). Although higher education scholarship consistently reports that financial barriers are the primary reason why undocumented immigrants do not attend college, administrative burdens in the college admissions process may also discourage

undocumented youth from applying to college as well as delay or hamper their acceptance of admission.

An administrative burden refers to “an individual's experience of policy implementation that turns onerous” (Burden et al. 2012, p.741). Individuals cope with administrative requirements and rules when they claim public benefits. Administrative burdens scholarship identifies possible learning, compliance and psychological costs when individuals seek public benefits (Herd and Moynihan 2018; Moynihan et. al 2015). How administrative burdens shape policy outcomes —individually and collectively— has been an ongoing concern that scholars, particularly those in public administration, have aimed to explain (e.g., Burden et al., 2012; Hattke, Hensel and Kalucza 2020; Heinrich, 2016; Herd, DeLeire and Harvey 2013; Herd and Moynihan 2018; Keiser and Miller 2020).

Individuals confront costs when they look for information about a policy, service or program; read instructions; fill out forms; demonstrate they meet certain requirements; gather proper documentation; commute to an agency office; wait in line; submit paperwork; and in some cases, interact with street-level bureaucrats who have the administrative discretion to approve or reject their applications (Herd and Moynihan 2018).

Numerous questions drove my attention to studying whether admissions administrative requirements and rules might deter undocumented youth from applying to public colleges and universities and benefit from in-state resident tuition benefit. This dissertation responds to such questions: What administrative burdens could prevent undocumented youth from applying to college and claiming ISRT benefits? Why do some states and higher education institutions have established admissions requirements that may discourage or limit undocumented youth from receiving ISRT benefits? Why do other states and colleges set requirements that make the

admissions process administratively simpler? How do undocumented students navigate the admissions process and cope with the associated administrative burdens? Why do some admissions officers perceive extra documentation and paperwork as necessary, while others require only proof of having lived in the state and graduated from a state high school? What factors could influence admissions officers' perceptions of importance of admissions requirements when undocumented youth apply for college and claim ISRT benefits?

This dissertation explores theoretical perspectives and empirical evidence that may help in better understanding how administrative burdens may hamper the access of undocumented students to higher education and to ISRT benefits. It also examines the political and organizational factors that seem to shape such burdens. In doing so, it offers a preliminary analysis of the impact of administrative burdens on policy outcomes in a relatively unexplored arena—higher education policy—and on a distinct group—undocumented immigrants. Since policy implementation involves a necessarily high degree of administrative discretion with interpretative elements, the roles of higher education institutions and admissions personnel when implementing ISRT policies are important to investigate and are among the issues that scholars often do not explore (Dougherty, Nienhusser, and Vega 2010).

I argue that the nature and levels of admissions burdens within and among states are venues where politics in policy implementation occurs. Public administration scholars claim that administrative burdens become policymaking instruments when political actors are reluctant to acknowledge the public values and outcomes informing policy (Hattke, 2020; Herd and Moynihan 2018). Furthermore, scholars have asserted how administrative burdens are associated with perceptions of deservingness of target groups (Baekgaard, Moynihan and Thomsen 2020; Bell 2020; Bell et al. 2020; Schneider and Ingram 1993; 2005) This, in turn, may help one

understand why policies and college admissions requirements vary considerably across states and institutions.

Although I recognize that multiple factors shape variations in the level and nature of burdens across and within states, I contend that social constructions of the deservingness of undocumented youth—tied to a strong narrative of belongingness in the states and the nation—are important parts of the story. Multiple actors are involved in ISRT policy implementation at different levels. However, I consider college admissions officers—street-level bureaucrats (SLBs)—as crucial agents in implementing the ISRT policy (Nienhusser 2018). Admissions officers interact directly with undocumented youth applying for college and validate ISRT requirements. They frequently have the power and discretion to shape admissions requirements and grant or deny admission.

Although one might expect that SLBs make decisions based on known and established administrative procedures (Romzek and Dubnick, 1987), the rules and SLBs' decisions are not neutral. Instead, these frontline workers exercise administrative discretion in ways that reflect their individual values and beliefs (Bell 2020; Bell and Smith 2019; Keiser and Miller 2020; Soss et al., 2011). Considerable scholarship finds that perceptions of the deservingness of target populations help shape preferences among SLBs and the general public about the allocation of policy benefits and appropriate levels of burden (Pierce et al., 2014; Schneider and Ingram, 2019; Bell 2020). Numerous scholars have explored how SLBs guide policy implementation and affect outcomes (Baekgaard, Moynihan and Thomsen 2021; Barnes and Henly 2018; Burden et al. 2012; Bell and Smith 2019; Moynihan, Herd and Ribgy 2016), but such work has not systematically examined U.S. higher education policies that affect specific target groups.

In this dissertation, looking through the lenses of policy implementation at the state and institutional levels and drawing upon administrative burdens scholarship, I examine admissions applications at the institutional level, undocumented students' reports of their experiences, and the perceptions of admissions officers. By understanding administrative burdens from three different vantage points (organizational, individual student experiences, and street-level bureaucrats' perceptions), the study engages discussions in public administration about the tensions among efficiency, equity, policy integrity, and administrative discretion.

The remainder of this chapter briefly presents the context and scope of the dissertation, discussing the focal target population and core scholarship. It then introduces the varying sources and types of data collected and analyzed and provides an overview of the subsequent chapters. The chapter concludes with notes on the terminology used throughout the study.

### **Undocumented Youth and In-State Resident Tuition Policy**

By 2017, close to 10.5 million undocumented immigrants lived in the United States, making up 3.2% of the national population (Budiman 2020).<sup>1</sup> Those immigrants entered the country either without legal authorization or with temporary visas and overstayed the expiration date (USCIS 2021). Undocumented adult immigrants usually come with their children, seeking employment opportunities and better futures for their families. Some others flee extreme violence, poverty, and corruption in their countries of origin. About 46% of undocumented immigrants are Hispanic, 25% Asian, 15% Black, and 12% non-Hispanic White (Redden 2020).

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<sup>1</sup> Undocumented immigrants are individuals who are not U.S. citizens and who have not been legally admitted to the U.S. for residence, work, studying, sightseeing, or business (Passel and Cohn 2010; USCIS 2021).



About 47% of children of undocumented adult immigrants came to the U.S. before they were 12 years old, 39% arrived between the ages of 13 and 21, and the remainder came when they were older (Redden 2020). Nearly 60% of undocumented youth reside in California, Texas, Florida, New York, and Illinois, with many of the remaining in Georgia, Maryland, New Jersey, North Carolina, Virginia, and Washington (Budiman 2020, p.1).

Undocumented children mostly enter public education systems for elementary and secondary school without major inconvenience (Abrego and Gonzales 2010). In 1982, the United States Supreme Court in *Plyler v. Doe* ruled that public schools could not ban either undocumented immigrants or children of undocumented migrant parents from accessing free elementary and secondary public education.<sup>2</sup>

The U.S. Supreme Court found that children should not assume the consequences from their parents' or caregivers' decisions to migrate or remain in the country unlawfully. Through this law, the Court extended the Fourteenth Amendment's equal protection clause to undocumented children (Gonzales Ruge and Iza 2005; Rodriguez 2009). One of the Court's rationales was that to deny elementary and secondary education meant excluding undocumented children from society: "By denying these children a basic education, we deny them the ability to live within the structure of our civic institutions and foreclose any realistic possibility that they will contribute in even the smallest way to the progress of our Nation" (*Plyler v. Doe* 1982, p. 223). Although the Court allows undocumented children to attend public elementary and secondary schools without any constraints, their fate in higher education is uncertain.

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<sup>2</sup> *Plyler v. Doe*, 457 U.S. 202 (1982).

The Migration Policy Institute has estimated that nearly 98,000 undocumented youth graduate from high school annually, but only 5-10% enroll in college (Passel 2010). This figure is lower than the 53% of documented youth immigrants and 62% of youth citizens who enroll in college after graduating from high school (Amuedo-Dorantes and Antman 2017; Gonzales 2016; U.S. Department of Education 2015). Further, in 2019, about 450,000 undocumented youth were enrolled in a U.S. higher education institution, making up about 2% of all U.S. college students (Redden 2020).

No federal law grants or restricts undocumented youth from attending college. However, federal law explicitly prohibits them from benefiting from federal student aid (FAFSA). Meanwhile, states and higher education institutions have designed policies allowing, limiting, or denying undocumented youth access to public higher education. Further, they have decided the types of benefits undocumented students can receive.

Between 2001 and 2020, nineteen states passed legislation granting eligibility for In-State Resident Tuition (ISRT) for undocumented students at public colleges and universities (NCSL 2021). Eleven of those states also provided eligibility for state financial aid to such students (Appendix A). Furthermore, seven other states have granted ISRT benefits for undocumented students through public college and university systems. Although two states, Arizona and Georgia, have restrictive policies, the University of Arizona, the University of Georgia, and some public community colleges allow DACA<sup>3</sup> recipients to benefit from in-state rates (Appendix B).

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<sup>3</sup> Deferred Action for Childhood Arrivals (DACA) refers to former President Barack Obama's executive order, issued in June 2012, which grants some undocumented immigrants a renewable two-year lawful presence to study and work in the United States, and protect them from deportation.

At the same time, Alabama and South Carolina prohibit undocumented immigrants from accessing public higher education institutions (Bjorklund, Jr. 2018, p.664). Indiana and Missouri, although allowing undocumented immigrants to attend public colleges and universities, have enacted policies that specifically prohibit them from receiving ISRT benefits (Appendix C). The remaining 19 U.S. states have neither established nor prohibited ISRT for undocumented students through legislation or in public college and university systems. Their higher education institutions have the discretion to decide whether to grant ISRT benefits to undocumented applicants and to establish admissions requirements and procedures for that purpose.

With some variation, ISRT policies that are available to undocumented students require applicants to present evidence of having attended a state high school between two and three consecutive years, earned a diploma or the equivalent (General Educational Development [GED]) from a state high school, and signed an affidavit of intent to become a legal resident (Amuedo-Dorantes and Sparber 2017). However, in states like Maryland, for example, undocumented youth cannot attend four years colleges or universities without first attending a two-year community college. Additionally, states like Florida, Maryland and Minnesota establish residency requirements and submission of tax forms that can be daunting for undocumented youth. Similarly, in 2020, Virginia legislated ISRT policy for undocumented youth, but the benefit is available only to those who have filed taxes themselves or whose parents have done so.<sup>4</sup>

Since financial barriers are the primary reason undocumented students do not attend college (Diaz-Strong et al. 2011; Serna, Cohen and Nguyen 2017), ISRT policy that allows them

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<sup>4</sup> Prior to 2020, state public colleges and universities had discretion to assist DACA recipients.

to pay in-state tuition— typically one-third of out-of-state tuition—is a public benefit for accessing higher education regardless of an applicant's legal status. Moreover, ISRT policies significantly influence undocumented youth's decision to enroll in higher education (Flores 2010).

The ISRT benefit for undocumented students is twofold. First, it extends access to public postsecondary education through lower tuition. Under U.S. law, "public benefit" in the context of higher education includes "postsecondary education..., for which payments or assistance are provided to an individual ..."5 When states subsidize public higher education for in-state undocumented students, then, they are providing an explicit and direct benefit.

Second, ISRT policies expand opportunities for undocumented students to continue their studies beyond secondary education. Undocumented youth tend to enroll in community colleges after graduating from high school (Teranishi et al. 2011). However, ISRT might encourage some to pursue a four-year degree at a public college or university instead of stopping with a two-year degree. Rendon and Hope (1996) contend that many minority students pursue postsecondary education in community colleges, planning to eventually receive bachelors' degrees. Although studies show that relatively few undocumented students transfer from two-year to four-year colleges (Teranishi et al. 2011), having ISRT policy in place constitutes an incentive to pursue higher education. Thus, the availability of ISRT is a public benefit for boosting access to higher education for undocumented youth who come from lower-income families (Diaz-Strong et al. 2011), have limited opportunities to be legally employed, and cannot access most state and institutional financial aid (Gildersleeve et al. 2010).

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5 8 U.S.C. § 1621 (2004).

One of the goals of ISRT policy was to boost the rates of college attendance of undocumented youth. As has been noted, however, studies estimate relatively limited effects on enrollment rates, with increases between 2.5% - 4.0%; in contrast, previous studies have found substantial increases in enrollment rates when governments subsidize higher education for lower-income populations more generally (Dynarski 2002; Goldrick-Rab et al. 2016).

Most higher education research on the barriers undocumented youth face in accessing higher education has focused on financial barriers--which are undoubtedly the main reason for not attending college. Nevertheless, little scholarship has explored whether administrative burdens also may discourage them from applying for and attending college. Further, few studies explore organizational and political factors that may influence variation in the levels of admissions burdens across and within states.

### **Core Scholarship**

Administrative burdens scholarship focuses on individuals' experiences, exploring the costs associated with coping with bureaucratic procedures and interacting with street-level bureaucrats in claiming and receiving public benefits. Such scholarship contends that bureaucratic procedures and organizational rules become administrative burdens in the form of learning, compliance, and psychological costs for claimants. When exploring individuals' perceptions of such rules, examination of the impact of bureaucratic procedures has moved from organizational costs-benefits analysis to inquiry about individuals' access to social and political rights (Heinrich 2016). Administrative burdens scholarship probes how organizational procedures and rules can affect the desire and ability of entitled individuals to participate in public benefits.

Administrative rules in organizations may become burdens from the perspective of the individuals who are subject to them. The rules may reflect authorizing legislation, reigning policy paradigms, organizational designs, technological structures, inter-governmental coordination, or levels of formalization (Jong 2016; Peeters 2019). They may result from deliberate decisions, including choices between efficiency and fraud prevention (Gajduscek, 2003; Doughty and Baehler, 2020). Whatever the root of such organizational rules, they often have substantial effects on individuals claiming public benefits. Brodtkin and Majmundar (2010; p. 842) contend that organizational practices—formal and informal—may result in administrative exclusion when individuals do not participate in public benefits because of organizational factors rather than individual eligibility, preferences, or abilities.

Administrative burdens also may be embedded in political values, and they can be viewed as means of policymaking (Herd and Moynihan 2018), the foci of this study. Through bureaucratic procedures, policy implementers shape access to political and social rights, guide the ways individuals interact with organizations, and disproportionately affect members of disadvantaged groups, who are generally less well-positioned to address burdens (Brodtkin and Majmundar 2010; Nisar 2018). Furthermore, policy implementers, including street-level bureaucrats, may impose higher learning, compliance, and psychological burdens on individuals who are seen as undeserving of a public benefit (Baekgaard, Moynihan and Thomsen 2021; Bell et al. 2020; Moynihan, Herd and Ribgy 2016). Schneider and Ingram (1997) have contended that target groups who lack representation, who are powerless politically and socially constructed as undeserving, tend to face greater burdens when accessing public benefits.

According to Herd and Moynihan (2018), when claiming public benefits, *learning* burdens may increase when an organization or street-level bureaucrats do not provide accurate

information about policy and criteria eligibility. *Compliance* burdens increase when claimants must provide documentation and complete paperwork that has little to do with the policy intent or that the organization could obtain in other ways. *Psychological* burdens may arise when street-level bureaucrats scrutinize individuals' private lives, make moral judgments, or mistreat claimants in interactions.

Administrative burdens do not affect all individuals in the same way. Individuals with fewer financial resources and less social and human capital are affected most (Christensen et al. 2020; Moynihan et al. 2015). Learning about the requirements and specifications of applying for a public benefit, may have greater effects on individuals with less education or who lack the necessary knowledge to understand them (Jong and Rizvi 2008). Other individuals may have more or less experience with accessing public benefits and filling out applications. Some may be shocked by certain questions and procedures. Heinrich (2016) also claims that lower-income individuals generally have less flexibility in their jobs, making it more difficult for them to apply or have the necessary time to complete procedures.

### **Administrative Burdens and College Application**

When examining applications for college admission, the multiple requirements that undocumented immigrants must meet to access higher education and benefit from ISRT illustrate the importance of administrative burdens to policy outcomes. In some public two-year and four-year colleges and universities, undocumented students must complete application forms that demand documentation that may be discouraging given their unlawful status. For instance, simply to apply to some colleges, undocumented youth applicants must provide social security numbers (SSN); several proofs of residency, citizenship or immigration documentation; notarized affidavits of intent to become legal residents; and immunization records as well as

evidence of family income and tax payments. Yet, presenting proof of having lived in a state and graduated from a state high school is sufficient to meet the requirements established by ISRT policies in those states granting the benefit to this population through legislation or through public colleges and university systems.

Furthermore, for undocumented youth, learning about administrative procedures and necessary paperwork may be more onerous for a variety of reasons. Most are first-generation college students, have fewer resources and support networks, and typically have less institutional knowledge of their rights and of higher education more generally than many of their U.S.-born counterparts (Bettinger et al. 2012). Undocumented students are often in limbo because of the limitations and different interpretations of their rights imposed by a multitude of policies and rules. They in particular navigate an admissions process with administrative rules that have been likened to puzzle pieces designed and implemented by different political actors. As Serna et al. (2014) have noted, “Undocumented students must rely upon policies adopted state-by-state or institution-by-institution to determine whether they can access higher education, benefit from ISRT, or obtain state-level financial aid” (p.4).

Not only do undocumented youth face college admissions processes that may be onerous, but they also may experience amplified psychological costs given their constant fear of deportation. This fear may lower undocumented youth's propensity for claims-making when applying for college (Abrego and Gonzales 2010). For instance, some studies have found that undocumented immigrants with children who are U.S citizens who could benefit from programs such as Medicaid and SNAP do not participate for fear of any legal action against them (Amuedo-Dorantes, Puttitanun, and Martinez-Donate 2013; Ku 2009).



This discussion introduces the challenges of undocumented youth and the administrative burdens--learning, compliance, and psychological--they confront when applying for college and claiming ISRT benefits. These will be elaborated in the chapters that follow.

## **Data and Methods**

The dissertation relies on four types of data. The first is composed of identifying and coding the admissions requirements at 273 community colleges located in states that grant ISRT benefits for undocumented students. Second is information collected from 19 semi-structured interviews with undocumented students in states offering ISRT policy. To complement the interviews, I collected data from surveys of 136 undocumented students in states with ISRT. A fourth data set comes from 210 complete surveys administered to admissions officers in public colleges and universities in states with ISRT.

The entire dissertation employs a mixed-methods analysis. The first manuscript (Chapter Three) relies on ordinary least squares regression (OLS) to estimate the effects of admissions requirements on enrollment rates of undocumented students. The second manuscript (Chapter Four) includes analyses of both qualitative and quantitative data. Based on the administrative burdens framework proposed by Herd and Moynihan (2018), I coded learning, psychological, or compliance costs that undocumented youth discussed in interviews and that they valued as onerous in open-ended survey responses. In analyzing the survey responses, I examined relationships between and among perceptions of burdens as well as the relationships of these burdens with respondent characteristics.

The third manuscript (Chapter Five) examines admissions officers' job tenure, race, ethnicity, and ideology as well as their support for and perceptions of the clarity of admissions

requirements when undocumented students apply to their institutions. In addition, I estimated the effects of admissions officers' political ideology, perception of deservingness, and level of interaction with undocumented students on the level of support for each administrative requirement in the application process. Finally, the chapter looks more qualitatively at the admissions officers' support for more standardized or more particularized admissions processes for undocumented applicants as well as their perceptions of the administrative requirements for such applicants to qualify for ISRT benefits.

### **Research Design Scope**

Limiting the study to states that grant in-state tuition permits a focus on understanding requirements that may hamper the receipt of public benefits by eligible individuals, undocumented students who could benefit from paying in-state instead of out-of-state tuition. Further, scholarship on administrative burdens only addresses theoretical and empirical analyses across programs and locations where a public benefit is available. In states where the ISRT is not available for undocumented youth, it is not expected that public higher education institutions have acted to address burdens when undocumented students apply for admission. Furthermore, previous studies also indicate that undocumented students' enrollment rates are notably higher in the states where this public benefit is available (Amuedo-Dorantes and Sparber 2014; Kaushal 2008). States that do not grant this benefit are not considered in this study since undocumented students' likelihood of pursuing postsecondary education in these states is relatively low, given the higher costs.

## **Overview of Chapters**

This study explores different kinds of administrative burdens--which produce varying learning, compliance, and psychological costs--that undocumented students confront when they apply to college and claim ISRT. Before turning to evidence about the administrative burdens undocumented youth experience that may hamper them from applying for college and claiming in-state tuition rates, Chapter Two discusses the implementation of ISRT policy at the state and institutional levels. The chapter describes the context in which ISRT has been established and factors that may be associated with variations in the requirements across and within states. Rather than examining how ISRT unfolds at the institutional level, the examination focuses on demographic and political cultural factors that may be linked to differing ISRT policy requirements at both the state and institutional levels. The availability of ISRT for undocumented immigrants and how it is implemented in part reflect a state's political leanings and how its political actors socially construct undocumented immigrants.

Three article-length manuscripts follow, each viewing ISRT implementation from a different vantage point. Chapter Three explores the dynamics of how some states and higher education institutions apply ISRT to undocumented applicants. Drawing upon administrative burdens scholarship, this chapter examines admissions requirements at a sample of 273 public community colleges in states in which undocumented students are eligible for ISRT. These requirements and related factors may represent barriers to undocumented youth applying to community colleges, and the chapter examines the effects of such burdens on enrollment rates of this target group.

Chapter Four identifies learning, compliance, and psychological costs that emerge when undocumented youth claim ISRT benefits. It is based on 19 semi-structured interviews with and

136 online surveys of undocumented applicants. The interviews focused on the college admissions experiences faced by undocumented participants, the administrative barriers they had to cope with, and the social-emotional stigma they confronted in pursuing further education. Similar to the interviews, survey questions asked about undocumented students' perceptions of learning about the admissions process; compliance costs, including the steps involved in filling out forms and meeting requirements; and their levels of concern when completing the process.

Chapter Five explores the attributes of admissions officers in public U.S. colleges and universities in the states with ISRT and their perceptions of the deservingness of undocumented applicants. Building on street-level bureaucracy scholarship, the chapter explores the characteristics of the officers (e.g., their ethnicity, self-reported ideology) and of the institutions in which they work that may be associated with their perceptions of the deservingness of undocumented students and their degree of support for admissions requirements when such students claim ISRT.

Finally, Chapter Six links the empirical analyses to the exploratory questions posed earlier. This concluding chapter also discusses the implications of the research for administrative burdens scholarship more generally and for the theory and practice of public administration.

### **Strategic Inquiry**

The several barriers that underrepresented groups face in accessing higher education have driven my attention throughout my academic career. Particularly in the last few years, I had the opportunity to interact with undocumented young immigrants who shared their stories of the financial and administrative barriers they faced in attending college. Their narratives inspired my research. Further, as an immigrant and Latina, I identified with the administrative and cultural

barriers that immigrants--documented and undocumented--face, and some of their struggles when feeling like "outsiders" in the United States. The development of this dissertation clearly is driven by something that I would call "representative scholarship," which seeks to study through theoretical and empirical research the interests of undocumented immigrants, with whom I share cultural identities.

A researcher's experiences in both personal and professional realms, interests, expertise, social and cultural identities influences the study's design, builds trust with target groups, and shapes the way of analyzing data, and reporting findings (Jones, Torres, and Arminio 2006). Undoubtedly, my position as a Latina and an immigrant facilitated my conducting interviews with undocumented students and receiving survey responses from undocumented youth. Above all, it helped gaining their trust to communicate the learning, compliance, and psychological burdens they cope with. Surely for someone who is not an immigrant and not Latino/a, carrying out this type of investigation would be more challenging. My position as a researcher is one of total support for reducing and eliminating administrative burdens for this population. I am convinced that extending educational opportunities to undocumented individuals benefits the country economically and socially.

Given my Latina identity and my frequent interaction with immigrants, I acknowledge that some of my interpretations of the findings may be biased. Since I support this population having ready access to higher education, my discussion could minimize or obscure the similar effects of administrative burdens on other marginalized groups who hope to attend college. However, throughout the document, I point out how unintentional elements, such as organizational factors, diverse interpretations, and benign negligence, could overlap with administrative burdens. Then, although, I assert in findings and discussions sections, for

instance, that the provision of documentation and the fulfillment of rules with other instances (e.g., IRS, higher education departments, state agencies' rules) could magnify the administrative burdens that undocumented youth face, I also contend in the findings and discussion, how those burdens result from ambiguity of the ISRT policy, the lack of inter-organizational synchronization in implementing such policy. However, I also claim how some states and higher education institutions seem to have taken more forceful actions to minimize the level of burden, particularly in those states where a moralistic political (sub) culture prevails as well as in those states where the social construction of deservingness based on innocence, belongingness, and future social and economic contribution predominates.

### **Note on Terminology**

Throughout the dissertation, I use the term "undocumented" instead of "illegal" when referring to people without legal authorization to stay in the country under U.S. immigration law. Such usage is part of an ongoing discussion in the public arena that remains unresolved. I do not use the "illegal" terminology because being undocumented does not capture the wide range of illegality in the United States. Indeed, some lawmakers contend that being "illegal" is used in connotation with criminal acts, but a person's immigration status is a civil connotation instead of a criminal one (Merolla, Ramakrishnan and Haynes 2013; Rubio 2016).

Similarly, I use the terms "immigrant" or "non-U.S. citizen" instead of "alien" when referring to people who are not U.S. citizens by birth or naturalization. Legislators in some states (e.g., California, Washington, Oregon, New York, and Colorado) have designed and enacted laws prohibiting the use of terms such as "alien" in official documents. Many immigration experts and others contend that the term "alien" is pejorative and demeaning with connotations of

lack of humanity (Cunningham 2011). Indeed, current U.S. President Joe Biden seeks to eliminate the term "alien" from laws and official documents and replace it with the term "non-citizens" (Fox 2021). Democratic U.S. House member Joaquín Castro noted: "the change, although symbolic, would be an important step to restore humanity after decades of dehumanization toward immigrants" (cited by Acevedo, 2021).

Throughout the dissertation, I also distinguish between undocumented youth and undocumented students. The former refers to traditional college-age undocumented immigrants (those between 18 and 25 years old) who are not enrolled in any higher education institution. "Undocumented students" refers to those who currently attend a U.S. college.

## **CHAPTER TWO**

### **IMPLEMENTATION OF IN-STATE RESIDENT TUITION POLICY FOR UNDOCUMENTED STUDENTS**

In the United States, the debate over in-state resident tuition policy for undocumented youth touches on concerns with fairness, citizenship, and membership in political communities that immigration and higher education policies raise more generally. In the absence of national laws about undocumented youth seeking higher education, some state governments and public higher education institutions have become policymakers when it comes both to granting or denying college access and to establishing residency rules for undocumented applicants to benefit from paying in-state tuition rates.

This chapter discusses the context of ISRT policy for undocumented students and identifies underlying factors that may influence its implementation and variation among and within states. It suggests that demographic and political-cultural factors may be associated with varying ISRT policy requirements at both the state and institutional levels. The availability of ISRT for undocumented immigrants and how it is implemented partly respond to the state's political leanings and how political actors socially construct undocumented immigrants. In particular, the social construction of the deservingness of undocumented youth for public benefits based on their "innocence" and "belonging" to a locality is significant to understanding the availability of ISRT, its implementation, and variations across states and institutions.

The next section outlines the political contexts in both the U.S. and the states in which ISRT policies are embedded and highlights the tension surrounding implementation at the state level. The following sections examine the role of higher education institutions as institutional



agents implementing the policy and the factors that may help to explain variation among states and institutions when establishing administrative requirements and rules for implementation.

### **In-State Resident Tuition Policy at the State Level**

As Chapter One noted, following *Plyler v. Doe* (1982), immigrant children can attend K-12 public schools regardless of their immigration status. Although no federal law prohibits undocumented students from going to college, they do not qualify for federal financial aid (Diaz-Strong et al. 2011; Gildersleeve, Rumann and Mondragon 2010). Given the absence of any federal law about undocumented immigrants in higher education, one might expect to see differences in how society perceive and construct undocumented children and undocumented youth or adults. For children—regardless of their immigration status or ethnicity, the narrative of vulnerability and deservingness may have more force. Some works show how children are almost always constructed positively as innocents and deserving of public benefits (Schneider and Ingram 1993, 1997; Grace 2008). Yet, when older undocumented individuals, constructions of deservingness appear to shift across states and may affect higher education policies aimed at undocumented youth.

The United States immigration system classifies undocumented youth as being either a DACA recipient or a non-DACA recipient.<sup>6</sup> This distinction is crucial to understand the access to higher education and the benefit of ISRT policy. The DACA program grants undocumented youth renewable two-year lawful residency—including a temporary Social Security number—that undoubtedly clears the way for them to apply to college and participate in the labor market.

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<sup>6</sup> Deferred Action for Childhood Arrivals (DACA) refers to former President Barack Obama's executive order, issued in June 2012, which grants some undocumented immigrants' temporary lawful presence to study and work in the United States and protects them from deportation (Macias 2018).

The DACA program is not available, however, for all undocumented youth. Without a "legal blanket," non-DACA recipients face more legal and financial barriers to accessing state and college or university benefits. Indeed, some of the undocumented youth interviewed for this study who are not DACA recipients but who have lived in the country since childhood have not attended any state college, due to the lack of Social Security numbers and other evidence of lawful presence (see Chapter Four).

In 2019, about 450,000 undocumented youth were enrolled in U.S. higher education institutions, comprising around 2% of all U.S. college students (Redden 2020). In the same year, nearly 241,000 DACA recipients were enrolled in college (Redden 2020). From available data, one might infer that about 200,000 undocumented students were not DACA recipients but still attended a U.S college.

An important federal law frames the states' ability to extend or restrict in-state resident tuition for undocumented youth is the Illegal Immigration Reform and Immigration Responsibility Act (IIRIRA) of 1996. This law establishes that states cannot provide a public benefit--including in-state tuition--to undocumented immigrants unless U.S. citizens can access the same benefits (Ruge and Iza 2005). States have interpreted this provision differently and taken different positions.

Some lawmakers and scholars argue that providing ISRT for undocumented youth conflicts with federal law since state public resources then would prioritize unlawful immigrants instead of citizens who live in the state, even though citizens who attend college in states in which they do not reside must pay out-of-state tuition (Reich and Barth 2010). In contrast, other legislators, immigration lawyers, and scholars have argued that federal law does not preclude a state or a higher education institution from admitting undocumented applicants or charging them

in-state tuition (Oas 2011; Ruge and Iza 2005). In other words, offering ISRT to undocumented immigrants is acceptable because the normative core of the policy is state residence and not citizenship.

The availability of ISRT at the state and institutional levels is the only real possibility for undocumented students to attend college. Such policy allows them to pay in-state tuition rates instead of out-of-state rates, if they meet certain requirements such as having graduated from a state high school, resided in a state, and signed an affidavit declaring their intention to seek legal residency. Although ISRT policies are intended to expand educational opportunities to undocumented youth seeking to go to college, the policy has been contested in many states. The tension is over whether state governments should extend and subsidize higher education for growing undocumented youth populations (Amuedo-Dorantes and Sparber 2014; Kaushal 2008; Dougherty, Nienhuser and Vega 2010). As Delisle and Darcy of the Brookings Institution note, in-state resident tuition: "...is an indirect subsidy and of the largest forms of aid in America's higher education system" (2016, 1).

Opponents argue that subsidizing college education diverts educational resources that should be channeled to support citizens and legal residents (Gilroy 2010; Rincon 2010). Opponents also contend that subsidizing education for undocumented immigrants encourages other immigrants to come to the country illegally and benefit from such policies and other public benefits. Meanwhile, supporters of granting ISRT policy benefits to undocumented students counter that since U.S. states have invested public resources in them through elementary and secondary education, not allowing them to benefit from ISRT is a regressive and inefficient expenditure of public resources (Reich and Barth 2010). Advocates also maintain that enabling them to access higher education benefits the country both economically and socially (Dougherty,

Nienhusser, and Vega 2010). Moreover, without such access, undocumented youth remain in an underground economy and generally are excluded from American society.

The competing arguments and tension over the ISRT eligibility of undocumented youth is evident in a number of states. For instance, Colorado banned the policy in 2008, but after advocacy groups argued in its favor, the legislature reestablished it in 2013 (Serna, Cohen and Nguyen 2017). Oklahoma and Wisconsin enacted ISRT for undocumented students in 2004 and 2009 but eliminated it in 2007 and 2011, respectively, justifying the revocations on grounds of fairness and efficiency (Richey 2019, Thangasamy, and Horan 2016). More recently, Oklahoma has allowed in-state tuition for undocumented youth through a decision by the State Board of Regents (NCSL 2021).

In Nebraska, the ISRT legislation passed in 2005, but since 2006, under the leadership of former Republican Governor Heineman, several attempts have been made to overturn it; however, as of June 2021 it had not been rescinded (Gildersleeve and Hernandez 2012; NCSL 2021). Likewise, multiple attempts have been made to repeal the policy in Texas, but none had succeeded by early 2021 (Enriquez et al. 2019; Canizales 2021; NCSL 2021). It should be noted that Texas was the first state to enable undocumented immigrants to benefit from ISRT policy in 2001, but since then Republican state legislators have sought to revoke the law, arguing that "state money cannot be spent to reward and encourage illegal immigrants" (Canizales 2021). In January 2021, Florida Republican legislators introduced a bill to repeal the policy enacted in 2014, arguing for budget cuts in state funding for public higher education institutions). One legislator noted: "We're not penalizing the kids, we're simply stating that the state of Florida cannot afford \$45 million to pay for their parents' bad decision." (Marazzi 2021, p.1) However, Democratic legislators have questioned such an initiative, arguing that it is contrary to American

values and attacks blameless individuals as undocumented youth. A Democrat legislator noted: “We're talking about students who have lived here, and we've already invested in them” (Ceballos 2021, p. 1).

Given such state battles over the provision or restriction of in-state tuition for undocumented immigrants, one could expect that such tension influences the institutional level. Further, the availability of ISRT in some states and college systems does not guarantee that individuals will qualify for it. State ISRT requirements for undocumented students are one matter; what some higher education institutions require may be another. As Brodtkin et al. (2010, 827) note more generally, “organizations operate as the gateway to public benefits.”

Implementation of ISRT policy involves several actors, including boards of regents in university systems, heads of state higher education agencies, college administrators, and street-level bureaucrats. Nevertheless, most studies exploring ISRT implementation across states find that college administrators and street-level bureaucrats ultimately decide which claimants are granted ISRT and which ones are not (Nienhusser 2014; Oseguera, Flores and Burciaga 2010). College staffers determine and validate proof of residency and compliance with institution-specific requirements (Nienhusser and Espino 2016; Nienhusser 2018). The following section examines such institutional-level dynamics.

### **Role of Higher Education Institutions**

Higher education institutions must implement ISRT policies in an ambiguous and frequently changing policy environment. They also must follow other policies at the state and institutional levels that may overlap with or limit the provision of ISRT benefits to undocumented students. It should be noted as well that state higher education institutions are

largely responsible for implementing the DACA program for those undocumented youth who choose to go to college. Although DACA does not enable undocumented students to access federal financial aid, in some states the ISRT policies of public college and university systems allow DACA recipients to benefit from paying in-state tuition and receiving institutional aid (e.g., Georgia, Nevada, Kansas). In other states, legislation allows the provision of both ISRT and state financial aid to all undocumented immigrants regardless of whether they are DACA recipients (e.g., California, Oregon, Washington).

Implementing ISRT is not necessarily straightforward, since such policies do not always mandate or provide instructions for how colleges and universities should apply the policy. Without specific guidance for implementation, college administrators and street-level bureaucrats may use their administrative power to establish requirements and create administrative procedures. This provides opportunities to shape rules in ways that may affect undocumented youth positively or negatively. For instance, an admissions officer at a Florida community college who responded to one of the surveys conducted for this study observed that institutional policies may thwart undocumented students' access to and benefit from ISRT:

For in-state residency, we require driver's license and vehicle registration which many undocumented students do not have even though they may have a job and pay Florida taxes. In most cases, those students have trouble providing documents because they are considered dependent until age 24. Also, their undocumented parents need to provide documents that they don't have many times. Then, they cannot be classified in-state.

Admissions Officers Survey Respondent # 126

A Texas admissions officer, however, observed how their institution had made efforts to facilitate the process:

We ensure that our requirements and process do not create additional hurdles for undocumented students. We do not take into account residency, citizenship, or visa status at the time of applying.

Admissions Officer Survey Respondent #140

Another admissions officer in New York also noted how the institution removed the SSN to increase undocumented immigrants' participation:

Our online application used to require a SSN. Some put zeros, unknown numbers abandoned the application. This can be challenging for the student to fix if they do not have assistance with the forms required by NYS. We changed in SP21 and saw impacts on undocumented students' applications. How we code students initially also impacts in-state or out-of-state aid rates.

Admissions officer in New York (#28)

A broad public administration literature has emphasized how policy design is generally vague and subject to several interpretations, leading to ambiguities in how organizational personnel execute policies (Ring and Perry 1985). Those responsible for policy implementation do not always follow formal administrative procedures or aim to achieve policy goals (McLaughlin 1987). For instance, personnel with heavy workloads may develop their own coping mechanisms (Elmore 1980). In addition, the values and beliefs of implementers, including street-level bureaucrats, may influence their decisions (Lipsky 1980; Herd and Moynihan 2018; Keizer 2010; McLaughlin 1987; Weissert 1994).

In implementing ISRT policy, higher education institutions play a significant role in interpreting and validating requirements for undocumented youth (Enriquez et al. 2019; Nienhusser and Espino 2016; Nienhusser 2018). Based on numerous studies at community colleges and four-year institutions, Nienhusser (2018) contends that colleges and universities have become the actual agents for granting ISRT. A 2018 survey by the American Association

of Collegiate Registrars and Admissions Officers reported that 17.5% of the admissions staff at public community colleges verify citizenship and legal residence; 29.2% and 25.3% said they verify these requirements if undocumented applicants claim in-state tuition and financial aid, respectively; and 23.4% answered they do not verify such documentation (AACRAO 2018). As an admissions officer pointed out in a November 2020 interview, they have discretion to facilitate or obstruct access to undocumented students: "We can figure out ways in which we can help. Of course, we cannot do anything illegal or unethical, but there is a lot of wiggle room between the two " (Nienhusser and Connery 2021, p. 17).

Although sometimes it might be better if policies were more specific about implementation, public administration scholars and practitioners contend that this could negatively affect policy outcomes (Barth 1992; Tummers and Bekkers 2014). When policy implementers follow rigid administrative rules, their power to be flexible is minimal, making it difficult for them to help some who claim public benefits. When policy implementation is less structured, some administrators and street-level bureaucrats who have greater discretion may achieve policy outcomes that respond to individual contexts and group interests (e.g., Sowa and Coleman-Selden 2003).

A higher discretion may allow some institutional agents and street-level bureaucrats to make decisions favoring undocumented students' access to higher education. For instance, an admissions officer at a Connecticut community college permitted an undocumented applicant to benefit from ISRT even though she did not meet the requirement of four-years of high school attendance, having attended for only three years (Nienhusser 2018, p. 436). Similarly, in some community colleges in California, admissions officers realized that undocumented immigrants might have lied about their immigration status or eligibility for residency but decided not to take



any actions against the students--including removing them from college or charging them out-of-state tuition--to allow them to complete their postsecondary education (Nienhusser 2018). Such findings suggest the extent of institution-level administrative discretion in verifying and validating documentation associated with ISRT requirements.

Details about the reasons for the availability of ISRT at the state level and its implementation at the institutional level are beyond the scope of this dissertation. The following section, however, briefly examines some of the factors that might help explain variation across states and institutions in implementing ISRT and the accompanying administrative burdens that undocumented youth confront.

### **Factors Influencing ISRT Availability and Implementation**

When substantial policy implementation responsibilities are entrusted to states and institutions, policymaking and outcomes may vary based on numerous factors, including demographic, social, and political variables (Percival 2004) and social constructions of deservingness (Baekgaard, Moynihan and Thomsen 2021; Schneider and Ingram 1993). Below is a general description of such factors.

- ***Demographic and Location***

The criteria for determining eligibility for ISRT and the accompanying administrative procedures may be influenced by some states' long histories of immigration (e.g., California, New York, Oregon, Washington, and Oregon). Indeed, in such states college administrative procedures and necessary documentation are broadly adapted to undocumented applicants (see Chapter Three). These states also provide financial aid. Texas and Florida, in contrast, differ;

despite histories of immigration, their established admission procedures and rules for undocumented applicants are more restrictive even though both states have ISRT legislation in place.

Other aspects such as the location of a college may influence administrative requirements and rules during implementation. A college located near the U.S. border may not be the same as one located in the interior; one located in a more urban area likely is not the same as one in a more rural area. Previous studies have demonstrated that views of and attitudes toward undocumented immigrants tend to be more hostile and demeaning in states nearer U.S. borders or more rural areas (Frasure and Wilcox-Archuleta 2019).

In many rural areas, undocumented immigrants are more likely to be perceived as "freeloaders" of public benefits and threats to native workers (Fennelly and Federico 2008). Such perceptions may be associated with more hostile climates toward undocumented immigrants who apply to or attend college.<sup>7</sup> In this study, an undocumented student, who resided in a rural area in California, noted how the high school principal commented about this stereotype:

Where I grew up is very rural, it's all fieldwork, many Latinx people there. There are not many professions except fieldwork, so there's not much of going away to college. When I asked for help, the principal of the high school, he just stared and I quote: "You illegals just come here to ask for things," and you know, ever since then, I had always had correlations or very negative correlations when it comes to disclosing my status.

Undocumented student in California P#7

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<sup>7</sup> It should be noted that in some rural areas undocumented immigrants may be welcomed from a utilitarian perspective that frames them as sources of labor and economic development (e.g., southeast Minnesota, central Iowa) due to having aging or declining populations (Kaushal 2005). Yet, when it comes to access to postsecondary education, the perceptions of undocumented immigrants taking public benefits may prevail.

Educational attainment, also, in a particular location is one of the most significant predictors of attitudes toward immigration. For instance, areas with more educated individuals tend to be racially more liberal and more open to providing opportunities to immigrants than locations with lower educational attainment (Diaz, Saenz, and Kwan 2011). Thus, considering local factors such as location and nature of the population may lead one to expect that college admissions requirements and procedures would be especially stringent in areas near U.S. borders and in more rural areas as well as in locations with less well-educated populations.

- ***Political Culture***

Among other factors, political culture may reflect attitudes and help shape policy decision-making and outcomes across and within states. Political culture refers to "the system of empirical beliefs, expressive symbols, and values which define the situation in which political action takes place" (Verba 1985, cited in Morgan and Watson, 1991 p.32). Daniel Elazar (1984) contended that political (sub) cultures, which he classified as traditionalistic, individualistic, and moralistic, contained embedded values about community, politics, and governance that can influence accepted approaches to governing and political behavior.

For Elazar, a traditionalist political subculture elevates social order and family structure. It accepts a "natural" hierarchy in society and a concentration of power in a few; when necessary, authoritative leadership directs political and religious spheres. This perspective sees governments as guarantors of social order and prioritizes values of obedience to authority, rules, and standard norms of behavior. Elazar (1984) contended that traditionalistic political subcultures have long histories of one-party dominance in state politics, low voter turnout, and social and economic conservatism.

An individualist political subculture values market-driven competition and meritocracy. In this subculture, governments should guarantee and regulate economies so that individuals compete under roughly equal conditions and meet private goals. Resources should be distributed based on individual qualifications and effort.

By contrast, a moralistic political subculture emphasizes community and civic virtue over individualism. Governments in this view should be driven by guarantees of democratic values and representation; governmental power should enhance the well-being of the broader community. Further, Elazar (1984) suggests that community-oriented values such as tolerance, empathy, helping others and strengthening social ties are significant in this subculture.

No state is purely individualistic, moralistic, or traditionalist, but each has varying combinations of these cultures. For instance, states like Texas, Arizona, and Alabama combine traditionalistic and individualistic elements, while others (e.g., New York, Vermont, Illinois) mix individualist and moralistic elements.

Elazar's notions of state and regional political subcultures could illuminate the understanding of attitudes and values surrounding ISRT policy. For instance, in areas where a more traditionalist political subculture prevails, some may see granting ISRT to undocumented youth as a violation of the social order and norms. Undocumented youth are not citizens, and they have remained in the country and broken legal rules. Further, the United States has made itself known as a nation of whites who influence ideas and practices in society (Glenn 2014; Omi and Winant 1994; Feagin and Elias 2012); then, those who do not appear to be "white" do not belong. Studies have also shown that in traditionalistic subcultures, areas tend to be less favorable to government subsidies (Sharkansky 1969). States that fall into this category may be somewhat less likely to spend state money to subsidize higher education for those who are not

legal residents; if they do offer ISRT, requirements may be more stringent, and state financial aid may not be available. Among the traditionalistic states that provide ISRT are Texas and Florida—through legislation—and Arizona and Georgia—through decisions by individual higher education institutions (e.g., the University of Arizona, some Georgia public community colleges).

In individualistic political subcultures, some may see granting ISRT to undocumented youth as unfair because they are not playing the game "fairly" since they are not citizens and have remained in the country without following the law. Indeed, in states where an individualistic political subculture prevails (e.g., Nevada, Indiana), most legislative discussion has focused on enabling undocumented youth to attend public colleges and universities but without allowing them to pay in-state rates (Gildersleeve and Hernandez 2012). Perhaps in such subcultures, it is appropriate to follow principles of free competition that allow individuals to pursue private interests; the state does not deny access to higher education, but still requires undocumented youth to pay out-of-state tuition.

In more moralistic political subcultures, granting ISRT to undocumented immigrants may be seen as more acceptable. In such areas, governments are expected to provide programs that benefit disadvantaged individuals and solve public problems. In this subculture, "the people have an undivided interest, in which the citizens cooperate in an effort to create and maintain the best government in order to implement certain shared moral principles" (Elazar 1984, 112). In this view, undocumented youth may be seen as disadvantaged and marginalized people in need of help, justifying governmental support for their attending college. Both undocumented students and the larger society benefit.

In more moralistic political subcultures, the notion of collective interest may be more straightforward in areas that are more racially or ethnically homogeneous (Hero and Tolbert 1996). One might expect that the presence of undocumented immigrants, mainly of Hispanic/Latin origin and presumed to have different cultures and values, might make it more challenging to identify and act in a shared collective interest. However, in states where moralistic political subculture prevails (e.g., California, Utah, Washington), designing policies seeking to address the needs of undocumented immigrants has been a constant over the last two decades. Indeed, these states were the first to adopt ISRT policies for undocumented youth.

Whether and how political subculture reflects and shapes state politics and policy continues to evolve. Elazar's understanding of political subculture was based on migratory flows of people. For instance, New York, although classified as predominantly individualistic, has witnessed considerable migration flows, including undocumented individuals, which may have influenced its enactment of more inclusive policies for them. Whether all states will respond similarly, though, remains open to question. Hero and Tolbert observe more generally, "Theory and analysis of several public policies suggest that racial/ethnic diversity provides a parsimonious and highly useful theory of policy variation in the states." (1996, p. 868).

States like California and Utah, which have designed inclusive policies for undocumented youth and immigrants, appear to have acted in ways that are consistent with a moralistic political subculture. Both were among the first states to enact ISRT policies for undocumented youth in 2001 and 2002, respectively. In addition, in 2012, the University of California-Berkeley established the first official program serving undocumented students (Sanchez and So 2015). Other related factors may be relevant as well. Utah also passed legislation that has allowed issuing driver's licenses to undocumented residents since 2005. Its inclusive policies evidently

are strongly influenced by the religious values of the Church of Jesus Christ of Latter Day Saints (Lindford 1979).<sup>8</sup> The University of Utah created a center—Dream Center--dedicated to serving undocumented students through their educational journey; and supporting them by providing services such as admissions guidance, finding state financial aid, and scholarships<sup>9</sup>. Two undocumented students interviewed for this study who reside in Utah emphasized how their colleges made multiple efforts to reduce administrative rules--documents and paperwork, including the elimination of the signed notarized affidavit to qualify for ISRT benefit (P#2 and P#17).

In states with fewer immigrants (e.g., Nebraska, Maryland) or more contentious debates about offering benefits to immigrants (e.g., Texas, Arizona, California), efforts to respond to the distinctive circumstances of undocumented youth may be less significant and more discouraging to applicants. In those states, college administrators and street-level bureaucrats may be less supportive when undocumented youth claim ISRT benefits. For instance, in Colorado, which banned ISRT policy in 2008 and enacted it again in 2013, an admissions officer who responded to this study's open-ended survey question about providing in-state tuition rates for undocumented youth noted:

It's a double-edge[d] sword. I've been paying taxes and my family immigrated legally. So why do my taxes go to someone who broke the law?

*Admissions Officer in Colorado, #92*

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<sup>8</sup> Indeed one of the core values of Mormonism is that helping foreigners is a divine mandate (Reeve 2015). The Mormons in the U.S. ultimately settled in Utah after many years of being expelled from areas across the country (Lindford 1979).

<sup>9</sup> See <https://dream.utah.edu/>

Those kinds of responses might lead one might to expect that those who oppose enabling undocumented immigrants to pay in-state tuition may use their administrative power to make the admissions process more burdensome and possibly even block acceptance despite an undocumented youth meeting requirements (for greater detail, see Chapters Four and Five).

- **State Political Partisanship**

Another factor that may influence the availability of ISRT policy is state political partisanship. However, such relationships are not straightforward. Democrats generally favor in-state tuition for undocumented youth and Republicans often disfavor it; however, in states such as Utah (2002) and Florida (2014), Republicans have led enactment of such policy. Some states passed in-state tuition legislation for undocumented immigrants when a single party controlled both the governorship and the legislature (e.g., California, Illinois, Maryland, and New Mexico by Democrats; Utah by Republicans). In contrast, states such as Texas, Florida, New York, Connecticut, and Kansas passed such policies when different political parties controlled the governorship or state legislature (Stephen, Robinson, and Hetrick 2014, 274).

Reich and Barth (2010) suggest that the dynamics of state legislative processes are crucial to understanding the viability of ISRT. In some states, policy debates focus on arguments framing a positive social construction of undocumented youth, their potential in society, and the moral obligation of state governments to help them to succeed (e.g., New York, Washington, California). In other states, debate revolves around principles of fairness and control of public spending (e.g., Texas, Arizona, Florida). Elsewhere, policy debate focuses on legal arguments about the constitutionality of states issuing policies that affect undocumented immigrants and that may conflict with federal immigration laws (e.g., Nebraska, Georgia).



Varying ISRT requirements across states and institutions also may follow narratives with embedded policy standards about what constitutes a deserving recipient. The next section discusses how perceptions of worthiness based on a narrative of innocence and belonging might affect the administrative burdens that undocumented youth encounter when they claim public benefits.

- **Perceptions of Deservingness Based on Innocence and Belongingness**

Scholars argue that society's perception of social groups influences the policy process (Schneider and Ingram 1993; 1997). Groups that are perceived as more positive and deserving will receive higher benefits and fewer burdens in receiving them than groups that are perceived more negatively or undeserving (Schneider and Ingram 1997). How target groups are constructed shapes policy agendas and legitimate means to address problems faced by target groups. Policy design also sends messages to target groups about their identity and role in society and affects how they interact with governments (Campbell 2012; Soss and Moynihan 2014).

Policymakers often justify providing ISRT to undocumented students based on narratives that respond to social constructions of such group's innocence and belonging. Undocumented youth interested in applying for college and claiming ISRT must demonstrate that they have resided and studied in a state and seek to remain in the U.S. Such ISRT requirements distinguish between those who "belong" and therefore deserve the benefit and those who do not belong and do not qualify for it. Since ISRT is a form of government subsidy for postsecondary education, it makes sense to spend state money on those who "belong" to a particular state, instead of those who do not.

“Belonging” refers to a sense of inclusion, of being part of a social group and of membership (Mallet-García and Garcia-Bedolla 2021). However, for undocumented youth, that sense of belonging—despite having grown up, attending public schools, and assimilated American values—may be undermined by their unlawful status. It is like "partial" belongingness or membership. ISRT policies mediate the unlawful status of undocumented youth and shape their sense of belonging and integration in society. Thus, their belonging is not determined by their citizenship or legal status but by their assimilation and reflection of the values, culture, and societal normal of the United States.

Historically, in the United States, policies associated with immigration have prioritized those who demonstrate acculturation (Patler 2018) and meet standards of being hardworking, qualified, and non-criminal (Flores and Schachter 2018). These criteria—arguably derived mainly from racial, ethnic, economic, and social values—are crucial before an immigrant is accepted legally, socially, and culturally in an area.

Although undocumented immigrants often are stereotyped as lawbreakers and criminals (Engbersen and Van Der Leun 2001; Tosh 2019; Wang 2012), along with not being native-born, undocumented youth in particular may be accepted and valued based on their proof of belonging, their perception as being innocents, and their potential contributions to the economy and society. Being an adult undocumented immigrant is different from being a young undocumented immigrant. The social construction of undocumented youth shifts the portrait of the deviant characterization of undocumented immigrants to a more positive picture of a deserving recipient (Schneider and Ingram 1993, 1997).

Undocumented youth labeled as "Dreamers" often are constructed as "innocents," inconsistent with a dominant narrative of other undocumented immigrants as lawbreaking, using

public benefits, and lowering wages in the U.S. (Perez 2015). Such a portrait of Dreamers likely is designed to help others perceive them as more deserving of public benefits. In this narrative, undocumented youth deserve to achieve the "American dream." They look and seem "American"; therefore, they "belong." Such undocumented youth are framed as innocent, raised in the American system, college-bound youth (Gonzales 2016), and who speak fluent and largely unaccented English (Yates 2004, 601).

Virginia Governor Ralph Northam signed House Bill 2123/Senate Bill 1387 in 2020, noting: "Until last year, undocumented students had to pay out-of-state tuition rates. We are all proud to have changed that. Lowering the cost barriers for children who have grown up in our schools. And now it's time to give those students the opportunity to get help in paying for their education" (Arnold 2021, 1). Similar narratives have led to the enactment of ISRT policies in other states (e.g., California, Washington, Colorado, New York).

By being raised in the United States, and by attending public schools, Dreamers "belong"; they have earned their places in society by assimilation. Dreamers also are victims of parental decisions to emigrate and live with them illegally in the United States (Sirriyeh 2020). Based on this narrative, it is unfair to prevent them from attending college and from receiving ISRT benefits in the states where they grew up.<sup>10</sup> Such interpretations are meaningful when one considers that in some states and educational institutions, ISRT policy is available only to DACA recipients, not to all undocumented youth. DACA recipients may be seen as being "more

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<sup>10</sup> This is consistent with the favorable image of those who "pull themselves up by their bootstraps" (see, e.g., Lopez 2019). In this view, individuals who earn things through their own sacrifice and effort are worthy of being members of the community.

worthy" of such benefits, since acceptance in the national program requires extensive documentation of continuous residency in a state and lack of criminal record.

Although DACA recipients are temporary legal "partial" residents, this status portrays them as "belonging" and makes them appear worthy to work and study. Evidence demonstrates that DACA recipients have a higher sense of belonging and membership in United States society (Venkataramani et al. 2017). Further, DACA recipients are viewed as resulting in fewer significant public burdens for the higher education system in the short and long terms. Along with being portrayed as "innocent" dependents, they also are constructed as potential taxpayers, supporting provision of a path to educational and professional success. Thus, providing this population with ISRT benefits and reducing administrative burdens in the admissions process is desirable (Kaushal 2008; Reich and Barth 2010).

Yet, a second narrative asserts that illegal residence in the country does not make undocumented youth belong in the country or the social and political system. In this narrative, "undocumented students reside in the United States in violation of federal immigration law, their presence, therefore, constitutes a threat to national order and internal security" (Reich and Barth 2010, 422). Further, although the "blame" lies with parents who brought them to the country illegally, without their will, this does not exempt them from being illegal and undeserving. A Republican legislator who voted to repeal ISRT policy in Florida noted: "We charge American students from the other 49 states and Puerto Rico the full-price to provide them with the nation's top-rated public education ..., but students who are in this country illegally get a sweetheart deal. Floridians first" (Downey 2021, 1).

Those who see undocumented students as law violators and undeserving of public benefits may favor imposing heavier burdens on them in the college application process

(Rodriguez 2018). For instance, a survey respondent from a Virginia community college noted: "I do not think undocumented students should be allowed to attend public institutions or obtain Federal financial aid" (Admissions officer #158). One might expect that undocumented youth who encounter college personnel, including admissions officers, embracing such a narrative would confront more burdensome college admissions procedures.

Social constructions of undocumented immigrants may influence how political actors perceive "appropriate" burdens in the admissions process, regardless of the specific provisions of ISRT policy. In states where undocumented students may be perceived as more "undeserving" (e.g., Florida, Texas, Nebraska), administrative burdens when applying to college and qualifying for ISRT may be heavier. In contrast, in states where undocumented students are viewed as more "deserving," admissions rules and procedures may be less burdensome (e.g., California, New York, Washington).

Social constructions of target groups affect not only policy design and available resources but also associated bureaucratic rules. Further, social constructions can influence the public, including those who implement the policies, for example, street-level bureaucrats. In turn, both policy design and implementation help shape as well as reflect target groups' identities.

## **Conclusions**

Without a relevant federal law, many state legislatures have made decisions about in-state tuition for undocumented immigrants, favoring, restricting or prohibiting it. Yet, ISRT statutes are not the only state laws that grant resident tuition rates to undocumented youth. In some states, statutes grant boards of higher education institutions the power to decide about ISRT and

establish residency requirements. Thus, formal ISRT policy is composed of both formal statutory law and rules set by state agencies and higher education institutions.

The absence of state guidance about how ISRT should be implemented when undocumented immigrants apply to college and claim ISRT benefits results in discretionary decisions at the institutional level. In such circumstances, decisions about who deserves a college education in effect are put in the hands of higher education administrators and college personnel (Oseguera, Flores and Burciaga 2010; Nienhusser 2018). Colleges determine whether and how to integrate undocumented youth into their institutions.

State and local contexts evidently are significant in shaping ISRT policy implementation. The availability of ISRT policy and how it is implemented may reflect state political subcultures. In areas with more moralistic political subcultures, the importance of educating community members and enhancing collective well-being could justify publicly funded higher education for undocumented youth. Meanwhile, in more traditionalistic and individualistic political subcultures, the importance of being fair, not rewarding unlawful behavior, and preserving conditions for free competition among individuals may prevail when designing and implementing ISRT policy for undocumented youth. Yet, there are not purely moralistic, individualistic, or traditionalist states. States have varying combinations of beliefs and values that reflect such subcultures and can affect policy making and implementation.

The substantial variations of requirements between states and higher education institutions lead to questions about why such differences exist. Several factors may influence how states and higher education institutions design and implement ISRT policy and shape administrative requirements when undocumented students apply for college and claim ISRT

benefits. Such factors include state demographics, migration patterns, state political affiliation, and a social construction of undocumented youth as innocents and belonging.

ISRT policies between and within states may be influenced by how state political actors socially construct undocumented immigrants in prevailing narratives. Narratives that support ISRT for undocumented youth construct them as innocents who "belong" in a particular state. ISRT policies clearly separate "members" and "non-members" of a state, and some distinguish innocent undocumented immigrants from others. For example, undocumented youth who immigrated to the country as minors and are acculturated in the American educational and social system are constructed as deserving of public benefits such as ISRT. Additional requirements established in some states and institutions imply a criterion of belonging, membership, and contribution to the state and the country.

The implications of variations across states and institutions are significant for public administration and higher education policy. ISRT policies and institutional rules are intertwined, and they implicitly "rule" on undocumented immigrants' unlawful status at the national level. That some states and institutions facilitate or obstruct access to higher education mediates the intergovernmental tension around the legalization and inclusion of undocumented youth. States and institutions indirectly chart paths toward legality, facilitating the participation of this population in their institutions and the integration in society.

States and institutions act as "immigration authorities" and play a significant role in shaping the unlawful status of undocumented immigrants by making and implementing policies that favor or disfavor them. By making policies such as granting in-state tuition rates, allowing access to welfare programs, issuing drivers' licenses and government identification cards as well as limiting cooperation with federal immigration authorities and creating sanctuary cities, states

mediate illegality (Chen 2016; Enriquez et al. 2019; Flores 2010). From this perspective, when colleges and universities implement ISRT, they become "sub-actors" of framing policies that affect undocumented youth, and impact their status.

The empirical explorations that follow begin to examine the dynamics of how some states and higher education institutions apply ISRT to undocumented applicants. The passage of ISRT policies has not substantially increased the numbers of undocumented students enrolling in college (Flores 2010; Gonzáles 2010; Amuedo-Dorantes 2017). Perhaps the administrative procedures and requirements established in some colleges and universities may help in understanding more about the availability of ISRT has not had the expected impact. As later chapters suggest, many admissions requirements impose learning, compliance, and psychological burdens on undocumented students, which may thwart their access to higher education and hinder them from benefiting from ISRT.



## CHAPTER THREE

### IMPACT OF ADMINISTRATIVE BURDENS ON UNDOCUMENTED STUDENTS' ACCESS TO POSTSECONDARY EDUCATION

#### **Abstract**

Financial barriers prevent undocumented students from attending college. Yet, administrative burdens may also discourage them from applying for college and affect their access to postsecondary education. Building upon policy design and administrative burdens scholarship, I examine the admissions requirements and underlying variables that could affect undocumented students' application to colleges located in the states that grant in-state resident tuition (ISRT) policy for this population, a public benefit aimed at improving accessibility to higher education. I find that requirements such as evidence of residency, notarized affidavits, and shortcomings like unclear instructions and lack of admissions staff dedicated to serving undocumented students are statistically significant predictors of a decrease in the enrollment rates of undocumented students. The findings have significant implications for administrative burdens scholarship by demonstrating the impact of requirements on policy outcomes in an unexplored policy area, higher education, and with a distinctive target group, undocumented individuals. Furthermore, this article suggests how variation in administrative burdens across localities may reflect undocumented individuals' perceptions of deservingness.

## Introduction

Antonio<sup>11</sup> is an undocumented youth who aims to enroll in a community college to start his postsecondary education. He studied at and received his diploma from a high school located in one of the nineteen states that have legislated in-state tuition eligibility at public colleges and universities for undocumented students. Yet, when searching for college admissions requirements, trying to apply online, filling out forms, pulling together documentation such as a Social Security Number (SSN), citizenship, residency, tax forms, immunization records, and an affidavit of intent to become a legal resident, among others, Antonio feels overwhelmed and realizes that meeting these requirements may be particularly difficult due to his undocumented status. Although he could benefit from paying in-state resident tuition (ISRT), which is cheaper than the cost of out-state resident tuition, he nonetheless could be deterred from completing the college application due to those requirements—especially in connection with his unlawful status—and the more or less strict interpretation of them offered by admissions staff at the institution of his choice.

Antonio's experience illustrates the significance of administrative burdens for accessing public benefits, a growing avenue of inquiry in public administration scholarship (Baekgaard, Moynihan and Thomsen 2021; Burden et al. 2012; Heinrich 2016; Moynihan, Herd and Ribgy 2013; Moynihan and Herd 2010; Moynihan, Herd and Harvey 2015), as it has exposed in

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<sup>11</sup> Antonio is a pseudonym for a profile of a composite of undocumented immigrants. An undocumented immigrant is a foreign national who: (1) entered the United States without inspection or with fraudulent documents; or (2) entered legally as a non-immigrant but then violated the terms of his or her status and remained in the United States without authorization (As defined by the National Immigration Law Center 2015)

previous chapters. When individuals claim for a public benefit, they cope with tangible and intangible costs. Individuals face learning, compliance, and psychological costs (Herd and Moynihan 2018; Moynihan, Herd and Harvey et al. 2015). The groundbreaking scholarship on administrative burdens has moved from the study of red tape during policy implementation to inquiry into public benefits access, questioning how administrative rules affect eligible individuals' claim on such benefits (Heinrich 2016).

As noted in previous chapters, in the United States, undocumented students can access public elementary and secondary education (K-12) (Abrego and Gonzales 2010), but face financial and legal barriers to attaining postsecondary education (Bjorklund 2018; Nienhusser 2014; Serna et al. 2017; Terriquez 2015). Between 2001 and 2020, 19 states have passed legislation; other states, through boards of regents or individual higher education institutions, have implemented similar policies extending undocumented students' access to college by granting eligibility for In-State Resident Tuition (ISRT) to undocumented students at public colleges and universities. Some states also have legislated state financial aid for such students (See Chapter One).

Although requirements to benefit from ISRT are relatively simple to meet, such as attending and graduating from a state high school, and signing an affidavit of intent to become legal resident (Amuedo-Dorantes and Sparber 2017), when it comes to claim such public benefit, bureaucratic procedures could limit participation. It is one thing; what some individual colleges require can be another. As Brodtkin and Majmundar (2010, 827) note, “organizations operate as the gateway to public benefits.” Further, individual college organizations decide who gets, what, when, and how (Moynihan and Soss 2014, 320).

Undocumented youth cope with administrative burdens when applying for college. What is not fully known is the extent that those burdens affect their desire to apply, and if applying, the amplified costs they face—given their unlawful status. Empirical scholarship addressing undocumented youths' access to postsecondary education consistently finds that financial constraints are the main barriers to undocumented students not attending college (Bjorklund 2018; Kaushal 2008; Flores 2016). Little research, however, has explored how administrative burdens in the college application may affect undocumented students' access to college. Drawing upon the administrative burdens scholarship, I examine college admissions requirements and underlying variables that could represent barriers to the access of undocumented students in 273 community colleges located in the 19 states that grant in-state tuition eligibility. I also estimate the effects of such burdens on undocumented students' enrollment rates.

This article adds to the administrative burdens scholarship by suggesting the impact of administrative burdens on policy outcomes in an unexplored policy area, higher education, and with a distinctive target group, undocumented individuals. This work also provides evidence to prior work in public administration by suggesting how administrative rules and requirements vary across localities and may be associated with a perception of deservingness for a target group (Baekgaard, Moynihan and Thomsen 2021; Bell 2020; Bell et al. 2020). This work also contributes to the scholarship on equal opportunity in higher education (Berkowitz et al. 1948; Harmon et al. 2010) by demonstrating that administrative burdens may hamper the access to postsecondary education of disadvantaged individuals who are less well positioned to address those burdens.

The empirical findings suggest the importance of considering the hidden costs and adverse effects that organizational requirements and rules have on individuals' capacity to access

public benefits. Formal and informal organizational practices guided by these rules may discourage entitled individuals and result in administrative exclusion (Brodkin and Majmundar 2010, 844). This work demonstrates that through admissions requirements, those who manage policy implementation and access to benefits may limit participation, despite the eligibility of undocumented students. Although the requirements necessary to benefit from ISRT policy are relatively similar across the states, community colleges have considerable administrative discretion in interpreting rules and shaping administrative burdens.

In the next section, I examine college admissions requirements, rules, and other underlying variables that may affect undocumented students' claiming for in-state resident tuition at public community colleges.

### **When Administrative Burdens Hamper Receipt of Public Benefits**

Administrative burden refers to “an individual's experience of policy implementation that turns onerous” (Burden et al. 2012, 741). A burden may arise because applicants need to learn about policy benefits and eligibility criteria, to comply with a range of regulations and rules, or to face the emotional effects and social stigma associated with participating and coping with varying administrative discretion to receive benefits (Herd and Moynihan 2018; Moynihan, Herd and Harvey 2015). Administrative burdens affect the public in different ways (Sunstein 2019). Through requirements and rules, political actors restrict access to political and social rights, shape the way individuals interact with organizations, and disproportionately affect members of disadvantaged groups, who generally are less well-positioned to address such burdens (Brodkin and Majmundar 2010; Herd and Moynihan 2018; Moynihan and Herd 2010; Nisar 2018).

Individuals' contexts and preferences matter when addressing administrative burdens. Cognitive and socioeconomic factors as well as preferences and expectations, shape the way individuals cope with burdens (Christensen et al. 2020). For instance, learning costs have a more significant impact on those with lower educational levels. For the most part, these individuals experience more difficulty understanding questions, filling out applications, and meeting requirements due to their lack of knowledge about navigating application procedures (Cuesta et al. 2019). Further, more disadvantaged individuals may make different decisions considering opportunity costs and the trade-offs of their choices. It may be one thing to fill out forms and gather required documentation when individuals have relatively stable resources such as a permanent job and flexible work hours. It is another thing to live day-to-day and sacrifice work hours to apply for a public benefit, which is costly in terms of time, money, and emotional distress and whose result is uncertain.

Several scholars have explored the nature of administrative burdens, and they agree that political actors—unintentionally and intentionally—shape burdens at different organizational levels (Bozeman 1993; Bell et al. 2020; Gajduschek 2003; Heinrich 2016; Herd and Moynihan 2018; Peters 2019). Administrative burdens could result from systematic elements such as legislation, policy paradigms, organizational designs, information systems, and flaws in intergovernmental and inter-organizational coordination (Jong 2016). Peeters (2019, 9) also contends, “burdens answer to deeply engrained interests, orientations, and routines in an organization.” Administrative burdens may also result from deliberate decisions, including choices between efficiency and fraud prevention (Doughty and Baehler 2020; Gajduschek 2003).

Administrative burdens could emerge from an organization's information architecture. Although information technology may be a tool for simplification, standardization, and

centralization of data in organizations (Kallinikos 2005), it also may turn into a mechanism of administrative exclusion (Brodkin and Majmundar 2010). Individuals who fill out online applications may not fit into designated categories or may not complete certain information for reasons other than eligibility. This could prevent individuals from applying or delaying the process while figuring out how to address the inconvenience. In the end, some individuals will be disadvantaged compared to those whose answers fit the “standard responses,” implicit in the information architecture. Thus, although policymakers and organizations may not consciously intend to impose such administrative burdens, the reality is that these may affect individuals negatively.

Although burdens may be unintended, resulting from organizations' lack of attention to how their practices affect citizens, burdens may also represent an extension of political preferences (Herd and Moynihan 2018, 36). Then, administrative burdens may be a means for hidden politics, a deliberate, planned, and intentional restriction of access to benefits through requirements and bureaucratic procedures (Baekgaard et al. 2021; Heinrich 2016; Herd and Moynihan 2018; Moynihan and Herd 2013; Moynihan et al. 2015; Nisar 2018).

Administrative burdens function as means of political actors' discretion (Baekgaard et al. 2021; Bell and Smith 2019; Gilke et al. 2018; Peeters 2019). Although procedural accountability assumes that decisions respond to known and established organizational rules and procedures (Romzek and Dubnick 1987), political actors' decisions frequently are not the result of neutral competence. Instead, burdens are rooted in individuals' political values (Herd and Moynihan 2018; Keiser and Miller 2020; Soss, Fording and Sandford 2011). Then, policy implementers, including street-level bureaucrats, instead of openly limiting access to public benefits to eligible individuals, impose further learning, compliance, and psychological costs (Bell et al. 2020; Herd

and Moynihan 2018). For instance, learning costs could increase if an organization does not provide information about a policy's eligibility criteria or offers insufficient information.

Compliance costs could increase when an organization requests documentation that has nothing to do with eligibility criteria or that could be obtained without the applicant's effort, for instance, through a data system. Psychological costs could increase with questions that demean individuals' identity, or when street-level bureaucrats scrutinize an individual's life, make moral judgments, or mistreat applicants. Thus, applying for public benefits may become onerous and discouraging, thwarting eligible individuals from accessing those benefits.

Empirical studies have found that when public programs such as Medicaid, Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and workforce training are onerous in the established requirements, access to those programs decreases significantly (Cherlin et al. 2002; Herd and Moynihan 2018). Additional research also suggests that the levels of burden are directly associated with the receipt of benefits. For instance, Kabbani and Wilde (2003) showed that an expansion in SNAP benefits was related to an increase in the requirements for obtaining such benefits, resulting in decreased applications. Herd et al. (2013) reported a similar connection for elderly citizens who applied for Medicaid in Wisconsin.

Considering administrative burdens as a means of policy implementation (Herd and Moynihan 2018) may also explain why burdens vary substantially across programs and localities. For instance, previous studies have found that state governments differ when imposing certain documentation and paperwork requirements to become eligible for the same welfare programs (Herd 2015; Herd and Moynihan 2018; Moynihan et al. 2013). Although there may be rationales at the state and institutional levels for establishing particular administrative



requirements and rules to receive benefits, some rules are not consistent with a particular policy's goal and eligibility criteria; instead, they include other evaluative criteria. Indeed, public administration scholars suggest that burdens reflect perception of deservingness (Baekgaard et al. 2021; Bell 2020; Mettler 1998; Schneider and Ingram 1993, 1997; Sidney 2003). When target groups with positive social constructions are considered deserving of public benefits, the level of burdens imposed is minimal. Instead, when negative social construction of target groups conveys an image of their being undeserving, those groups bear more burdens in accessing public benefits (Schneider and Ingram 1993, 1997). Thus, political actors will shape burdens according to their perceptions of the deservingness of a target group.

Whether administrative burdens are unintentional or intentional, they negatively affect eligible individuals by unjustifiably excluding them from accessing benefits. Then, organizational factors and political actors' attitudes rather than individuals' preferences or eligibility keep them from public benefits. Furthermore, the likelihood of exclusion is a function of the degree to which formal and informal organizational practices impose burdens on claimants, interacting with individuals' circumstances as well as their capacity to address those rules (Brodkin and Majmundar 2010, p. 830). Next, I suggest how college admissions requirements could affect undocumented students' desire and capacity to claim in-state tuition public benefits in those states where it is available.

### **When Undocumented Students Apply for College and Claim In-State Tuition**

Following the enactment of ISRT, enrollment rates in those states that grant this public benefit have increased by an average of only 2.5 to 4.0 percentage points (Amuedo-Dorantes and Sparber 2012; Kaushal 2008), which is less than what would be expected given previous findings

on enrollment responses when governments subsidize higher education for citizens (Chin 2010; Dynarski 2002; Hansen 1983) and low-income youth in two years college (Kane 1994). Other factors—not considered here—may explain why undocumented students do not attend college. For instance, given their limited family incomes and resources, undocumented youth may prefer to enter the labor market rather than invest money and time in postsecondary education (Amuedo-Dorantes and Antman 2017; Hsin and Ortega 2018). Besides, undocumented students consider their limited possibilities of joining the labor force upon completing college; because of their unlawful status, some may choose not to apply to college (Abrego and Gonzales 2010). Others do not receive accurate information and counseling during high school about their chances of attending college (Serna, Cohen and Nguyen 2017), and they do not apply. Indeed, Bettinger et al. (2012) suggest that giving accurate and timely information on college application and available financial resources impacts the college choices of disadvantaged groups.

Although numerous factors may help explain why undocumented students do not attend college (e.g., financial barriers, personal preferences, lack of high school counseling), this empirical manuscript focuses on administrative burdens in the form of learning, psychological, and compliance costs when applying at community colleges. As noted in previous chapters, ISRT policy for undocumented students is implemented differently at the state and institutional levels. States and institutions establish eligibility criteria and admissions requirements that may differ not only in their obligatory nature but also in the feasibility of meeting such requirements. How the ISRT policy “lands” at colleges and universities as well as the diverse political actors involved in its implementation may explain variation in admissions requirements for undocumented students when they apply for college.

Additional complexity flows from admissions officers' discretion in interpreting policy, checking requirements to validate "entitlement," and making decisions (See Chapters Four and Five). Examining an application from an undocumented student may reflect technical criteria (Flores 2016) and political preferences (Herd and Moynihan 2018; Moynihan et al. 2013). The technical element has to do with how admissions officers follow state and institutional rules to audit documentation and validate if an undocumented applicant is "legally" entitled to benefit from in-state tuition policy. The political element has to do with the principles and values that drive admissions officers to adjust and validate documentation from the applicants.

When undocumented immigrants apply for college and claim in-state tuition or financial aid benefits, their acceptance may be delayed or contested due to the lack of certain documents (e.g., SSN, tax forms, unexpired passports, and visas). Such documents are often presumed to be technical prerequisites for receiving the policy benefit. However, ISRT legislation does not require such documentation for undocumented students to receive the benefit. Cherlin et al. (2002) suggest that street-level bureaucrats sometimes became more concerned with satisfying organizations' procedural requirements than helping eligible individuals navigate systems that have become increasingly bureaucratic. Thus, undocumented students could experience administrative exclusion (Brodkin and Majmundar 2010), which could hamper them from receiving in-state tuition benefits even if they meet the policy requirements.

The level of burden likely increases when an undocumented student interacts with the college admissions staff, drops off an application, or is subject to questions. One might expect that undocumented students feel embarrassed about needing to provide evidence to explain their "illegal" status. Even more crucial, they may feel insecure talking with admissions staff, whom they have no reason to trust and who could disclose their status. Indeed, some studies point out

that undocumented youth report worries about detention and deportation of themselves and their families when applying for college (Benuto et al. 2018).

In states where undocumented students must provide immunization records for admission, some undocumented students may not apply because they do not have such records. That information may be impossible to secure from their countries of origin, or they may never have had health insurance coverage in the United States. In states that request proof of residency, such as a resident identification card or driver's license, undocumented students may be frustrated since such documentation depends upon lawful status, and only citizens or legal immigrants can supply it (e.g., Virginia, Florida, Maryland, Nebraska). In states where undocumented male students must register for the selective service simply to apply to college, complying is difficult since undocumented immigrants would need to take extra steps to do so (e.g., Minnesota, Colorado, Maryland). Furthermore, when undocumented students must provide tax forms or evidence of income either for themselves or for their parents, meeting this requirement may be difficult. Some undocumented immigrants do not have these documents as they work "under the table." Other undocumented immigrants work with fake SSNs, making providing evidence of income or tax forms risky.

The factors that may affect undocumented students' college applications and eligibility for ISRT suggest the following hypotheses:

H<sub>1</sub>: The admissions requirements associated with legal status and residency negatively affect undocumented students' enrollment rates.

H2: The underlying variables of language, admissions guidance, and staff dedicated to serving undocumented students are positively related to undocumented students' enrollment rates.

## **Research Context and Design**

To investigate college application requirements that might constitute administrative burdens for undocumented students during the admissions process, this study examined requirements in a stratified random sample of application forms from 273 public two-year community colleges in the 19 states that had in-state resident tuition policy (ISRT) in place for undocumented students between 2001 and 2019. Examination of these colleges' requirements took place from June through November 2020. Since college admissions forms are not standardized in some states, and some community colleges have discretion about admissions guidelines and procedures, it was necessary to analyze the application form at each community college—which is the unit of analysis.

Limiting the study to states that grant in-state tuition permits a focus on understanding requirements that may hamper the receipt of public benefits by eligible individuals: here, undocumented students who could benefit from paying in-state instead of out-of-state tuition. Previous studies also indicate that undocumented students' enrollment rates are notably higher in the states where this public benefit is available (Amuedo-Dorantes and Sparber 2014; Kaushal 2008). States that do not grant this benefit are not considered since undocumented students' likelihood of pursuing postsecondary education in these states is relatively low, given the higher costs.

- **Community Colleges as Unit of Analysis**

The study focuses on admissions to public community colleges since undocumented students primarily enroll in these institutions (Nienhusser 2014; 2018), which typically have higher acceptance rates for low-income applicants and those from communities of color (Abrego and Gonzales 2010; Suarez-Orozco et al. 2011). Community colleges are open-access postsecondary education institutions designed to democratize higher education and to serve more disadvantaged individuals (Roman 2007). Indeed, community colleges serve those individuals who could not access large universities or institutions with higher tuition costs and competitive selection processes (Dowd, Cheslock, and Melguizo 2016). By 2020, the average annual tuition and fees at community colleges for in-state students are \$3,412 compared to \$9,308 at four-year institutions<sup>12</sup>. The admissions requirements in community colleges vary, but overall, applicants must provide a high school diploma or GED, submit proof of residency, take the ACT or SAT—whose scores do not influence admissions decisions (Nienhusser 2014).

Because community colleges' acceptance rates are relatively high (85%) and most are open-access institutions (Villicana 2017; Wilson 2015), the expected differences among those who apply, who are admitted, and who enroll are expected to be minimal. Further, scholars report that nearly 70% of undocumented students enroll in community college (Nienhusser 2014; Teranishi and Suarez-Orozco 2011). Undocumented students also appear to be underrepresented in 4-year colleges, with 8% enrolled there (Butler, Madden, and Smith 2018).

Given community colleges nature as open-access institutions, it is expected that those institutions adjust their admissions policies to benefit from in-state tuition policy, considering undocumented immigrants' legal status. Yet, such adjustments have been contested, particularly

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12 Retrieved from EducationData.Org <https://educationdata.org/average-cost-of-college>

over the last decade, when community colleges have experienced state budget cuts and increasing application rates (Morris 2017). Some political actors have opposed allowing undocumented immigrants to access postsecondary education paying the same tuition rates that citizens and legal residents pay (Salsbury 2003). In states like Texas, Florida and Nebraska, political actors argue that community colleges struggle to provide for increasing numbers of citizens and legal residents; therefore, unlawful immigrants should be limited or at least they should pay out-state tuition rates (Aguilar 2017).

In this context, since community colleges do not have competitive admissions processes, these institutions may impose administrative burdens— learning, psychologist, and compliance costs—to limit undocumented immigrants' participation, even if they meet the requirements of the in-state tuition policy. With increasing demand for places in community colleges and ongoing debate about prioritizing public spending to serve the most “deserving,” community colleges could create "funnel policies" that filter the most deserving citizens and legal residents. Thus, selection criteria based on citizenship and lawfully residency may gain validity.

The sample of community colleges was drawn from U.S. Department of Education data (2020); it represents 43% of the 625 public community colleges in those 19 states that grant ISRT for undocumented students. The sample was stratified to produce statistical representativeness among the states (see Appendix D).

### Dependent Variable

To estimate the impact of administrative burdens and underlying variables on undocumented students' enrollment rates, this study uses a proxy for undocumented immigrants to operationalize the dependent variable. According to the Integrated Postsecondary Education

Data System (IPEDS), undocumented students are reported mainly as “non-resident alien” (which includes DACA students).<sup>13</sup> The dependent variable was then operationalized as an average of first-time enrollment rates of “non-resident aliens” for the years 2019-2020 at the institutional level. Although the cross-sectional data for administrative burdens are limited to 2020, averaging enrollment rates for 2019 and 2020 recognizes the possible impact of COVID on the propensity to apply for college and claim ISRT. It should be noted that COVID effects primarily hit low-income individuals, including Hispanics and undocumented immigrants (Bernstein, Gonzalez and Karpman 2021; Krogstad and Lopez 2020). Considering previous years' enrollment rates buffer the COVID impact on enrollment rates in 2020. Data for the proxy for undocumented students' enrollment at the institutional level come from the Integrated Postsecondary Education Data System (IPEDS).

### Independent Variables

The independent variables are each of the admissions requirements and underlying elements coded according to the burden level. Most community colleges require creating an online account to start the application process, and several community colleges' websites allow applicants to download the application form. When the application was online, I created an account using the pseudonym “Maria Gonzalez.” I identified the admissions questions and requirements that could be onerous particularly for undocumented students. The examination also considered underlying variables that may make the admissions process more or less challenging to navigate.

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<sup>13</sup> IPEDS Guidelines Higher Education Institutions.  
[https://surveys.nces.ed.gov/IPEDS\\_PY/VisFAQView.aspx?mode=reg&id=3&show=all](https://surveys.nces.ed.gov/IPEDS_PY/VisFAQView.aspx?mode=reg&id=3&show=all)



To test Hypothesis 1, I examined and coded eight requirements on the application forms that represent administrative burdens, tapped by the learning, psychological, and compliance costs they impose on undocumented students.<sup>14</sup> The administrative requirements were validated through interviews with undocumented students (IRB 18-689). For each admissions requirement identified as an administrative burden, I assigned values ranging between 0 and 3 (lowest to highest-burden) for SSN, application fee, residency, and citizenship; between 0 and 1 for tax forms, family information, vaccination records, and for a notarized affidavit. Coding is based on the level of obligation, availability, and feasibility of carrying out the online application process and the extent of difficulty in meeting certain admissions requirements (see Appendix E).

In coding the burdens indicators, I assumed that if an undocumented applicant cannot continue the online application without providing a SSN or information about citizenship or legal residency, they face a higher burden. I also assume that requiring an applicant to call, email, or visit the admissions office represents a higher level of burden, including costs in time and money. A higher application fee may discourage an applicant from applying. Similarly, more documentation of residency (e.g., state identification card, driver's license, utility bills) or certain documents to prove an applicant's citizenship and country of origin (e.g., visa, passport) may increase the level of burdens. A notarized affidavit—a written statement of intent to be a legal resident—increases the level of the burden as well.

To test Hypothesis 2, I also examined and coded three underlying variables that could make the application process easy or difficult to navigate. Since 80% of undocumented

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<sup>14</sup> The admissions requirements examined were application fee, Social Security Number (SSN), notarized affidavit of intent to become a permanent resident, citizenship and immigration documentation, proof of residency, family information, tax forms, and immunization records.

immigrants are Hispanic (Budiman 2020), I examined the application form's language; if the application form is available in both Spanish and English, the level of burden would be lower for those individuals who are less fluent in English (see Appendix E). I also coded if the college website displayed admissions guidelines about filling out forms and meeting requirements, and if the college designated admissions staff to serve undocumented applicants. I assume that colleges' websites that display the contact information of admissions staff dedicated to serve this population represent a lower burden for this population in terms of learning and psychological costs. Previous studies have found that guidance and support in completing application forms among those applying for public services resulted in substantial increases in applications (Bettinger et al. 2012; Bhargava 2015; Engberg and Aliza 2014; Saez 2009). Together, these indicators connote undocumented students' overall administrative burdens at the institutional and state levels.

## Methods

To explore the hypotheses, I used ordinary least squares regression (OLS) to estimate the effect of the independent variables (administrative burdens and underlying variables) on the dependent variable (a proxy of undocumented students' enrollment rates).

To test hypotheses 1 and 2, the specification is:

$$(1) Y_j = \alpha + \beta_1 \text{ApplFee}_i + \beta_2 \text{SSN}_i + \beta_3 \text{Affidavit}_i + \beta_4 \text{Citizenship}_i + \beta_5 \text{Residency}_i + \beta_6 \text{FamInf}_i + \beta_7 \text{TaxForms}_i + \beta_8 \text{ImmRecords}_i + \beta_9 \text{AdmissionsGuidelines}_i + \beta_{10} \text{StaffServedUnd}_i + \beta_{11} \text{Language}_i + \epsilon_i$$

Where:

$i=1, \dots, 273$  (community colleges)

$j=1, \dots, N$  (proxy undocumented students' enrollment)

$Y_j$  is a proxy for undocumented students' enrollment at the institutional level from 2019-2020.  $\beta_1 \text{ApplFee}_i$  is the categorical application fee variable as coded.  $\beta_2 \text{SSN}_i$  is the level of obligatory of the social security number as coded.  $\beta_3 \text{Affidavit}_i$  is a dummy variable that indicates if the college requires a statement of intent to become a permanent resident (1) or does not require it (0).  $\beta_4 \text{Citizenship}_i$  is the level of obligation to provide proof of citizenship (passport, visa).  $\beta_5 \text{Residency}_i$  is the amount of proof of residency required (e.g., resident alien card, driver's license, utility bills). The variables  $\beta_6 \text{FamInf}_i$ ,  $\beta_7 \text{TaxForms}_i$ , and  $\beta_8 \text{ImmRecords}_i$  are dummy variables that indicate if the online application requests them (1=yes, 0=no).  $\beta_9 \text{AdmissionsGuidelines}_i$ ,  $\beta_{10} \text{StaffServedUnd}_i$ , and  $\beta_{11} \text{Language}_i$  are dummy variables that indicate if the college websites display these features (1=no, 0=yes). In the case of language, the dummy variable indicates if the application form is in Spanish or English (1=English only, 0= both).

Since previous studies have found that tuition costs (Amuedo-Dorantes and Sperber 2014; Kaushal 2008), availability of state financial aid, and proportion of undocumented students in a state (Amuedo-Dorantes et al. 2013) may help explain the enrollment rates of undocumented students, I included such controls in a second regression model.

$$(2) Y_i = \alpha + \beta_{(1-11)} + \beta_{12} \text{InstTuitionCost}_i + \beta_{13} \text{StateFinAid}_i + \beta_{14} \text{Prop.Und.Students}_i + \epsilon_i$$

Where:

$\beta_{(1-11)}$  refers to each of the admissions requirements and underlying variables in Model 1.

$\beta_{12} \text{InstTuitionCost}_i$  is the institutional tuition cost.  $\beta_{13} \text{StateFinAid}_i$  is a dummy variable tapping whether the state grants state financial aid for undocumented students. Finally,

$\beta_{14} \text{Prop.Und.Students}$  is the estimated proportion of undocumented students in the state; the

estimates come from U.S. Citizenship and Immigration Services (2020), considering each state's DACA recipients.

## **Data Description**

Features of college application forms and admissions processes vary considerably across the community colleges and states in the number and obligatory nature of requirements, language, feasibility, complexity, and available response options. The differences are substantial and evident both between states and within them.

Variation in admissions requirements across states and colleges may reflect diverse factors. One, for instance, is how long the ISRT policy has been in effect. The first states that enacted the policy (e.g., California, New York, Washington, Illinois) may have more standardized rules and procedures that respond to undocumented students' realities than states that have recently adopted the policy (e.g., Connecticut, Kentucky, Virginia). The number of higher education institutions within a state and their coordination among higher education institutions matter. One might expect that in more decentralized educational structures—in which community colleges and other colleges and universities are more autonomous in making decisions—requirements may vary substantially (e.g., Florida, Maryland, New Mexico). In more centralized educational systems, states may create more standardized application forms to be used at the institutional level (e.g., New York, Illinois, Washington).

Variation in admissions requirements also may reflect the number of undocumented individuals residing in a state or region. Perhaps in areas with larger undocumented communities (e.g., California, Washington, Oregon) those involved in implementation are more aware of their legal realities and the admissions requirements are more likely to respond to such constraints.

The opposite could happen as well. For instance, Moynihan et al. (2013) suggest that in localities with more Medicaid beneficiaries, requirements and rules were more onerous to reduce the number of applicants and constrain public spending.

In states such as Colorado, New York, Washington, Illinois, and California -- states with large undocumented populations, more liberal politics, and more favorable social constructions of immigrants, the college admissions forms are standardized and seem relatively simple for undocumented students. If an undocumented student does not have an SSN, they can leave this checkbox blank or the online application instructs them to enter zeros. Information on residency and citizenship is quite simple and does not require rigorous scrutiny. If an applicant cannot report income for themselves or their families "officially," they can document it by a written statement from their own or their parents' employers. Undocumented applicants are also not required to submit tax forms if they lack them. High school transcripts and evidence of graduation are collected via administrative data to which the states already have access. It should be noted that in New York, the City University of New York (CUNY) has established notarized services within the community colleges to meet the affidavit requirement established by the state policy (Nienhusser 2014). This action clearly reduces psychological and compliance burdens for undocumented students interested in applying for college.

Yet, not all standardized application forms are simple. For example, in Connecticut, one of the states that grant both ISRT and state financial aid for undocumented students, the standardized application form requests provision of multiple documents and other paperwork. The application consists of 14 pages and 8 sections. It includes requirements such as a notarized affidavit of intent to become a legal resident, household information, individual and parental legal and financial information (including proof of taxed and untaxed incomes), information

regarding whether the applicant or their family received public benefits such as free or reduced-price school lunches, SNAP, TANF, or Medicaid. Certainly, meeting such requirements can be daunting for undocumented applicants.

In states such as Florida, Nebraska, New Mexico, the admissions forms and requirements are not standardized and seem quite onerous to meet across the community colleges. For instance, in most community colleges in Florida, students must present at least two items such as the following as proofs of residency: Florida identification number, driver's license, Florida voter's registration card, proof of permanent home, and Florida high school transcripts for multiple years. They also must provide at least one of the following documents: utility bill with proof of 12 consecutive payments, lease agreements, and 12 consecutive months of receipts or other documents evidencing family ties in Florida, among others. Applicants also must provide copies of immigration documents. Pulling together such documentation is complicated for undocumented individuals since most such paperwork is tied to legal status or they simply lack them. Furthermore, evidencing family ties likely is highly stressful for this population, given fear of deportation.

In states such as Florida, meeting admissions requirements appears quite burdensome, and it might well discourage individual applications, despite the benefit of in-state tuition. It is clear that requirements are designed to deal with selection bias by controlling for characteristics of individuals' deservingness (Moynihan et al. 2013, p. 500). In states such as California, Minnesota, and Maryland, male applicants must register with the U.S. Selective Service. This requirement could be overwhelming for undocumented individuals. First, undocumented male applicants who do not have SSNs—for instance, those who are not DACA recipients—cannot register for Selective Service (see Selective Service System guidelines). One might then expect

that they must follow extra steps and file more paperwork to even register for the Selective Service. Second, those who can register—for instance, DACA recipients that hold temporary SSNs— may be discouraged for fear of deportation. However, some states have taken action in this area. For instance, California has created a state electronic system ([www.caldreamact.org](http://www.caldreamact.org)) for registering undocumented male applicants who wish to apply to community colleges or other higher education institutions.<sup>15</sup> In this case, the states clearly facilitate applications from undocumented youth. It assumes the role of "buffer" between undocumented students and external requirements imposed at the federal and state levels.

### **Hypothesis results**

Turning to the quantitative results, Table 2 shows the distribution of administrative burdens among the sample's 273 community colleges. The columns show the percentage of colleges that require information about or documentation of each admissions requirement (see Appendix A). Variation exists for each of the indicators of administrative burdens. Application fees, a compliance cost, range from \$0 to \$50 ( $M=17.3$ ,  $SD = 19.1$ ). However, almost half of the community colleges have no application fees (See descriptive statistics for each administrative burden indicator in Appendix F).

Close to 38.1% of community colleges request social security numbers without guidance for applicants if they do not have them, with 7.37% not allowing applicants to continue the online application without this information. Although this study does not consider "what happens behind the window" (that is, how applicants resolve this feature in the online registration

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<sup>15</sup> See the California Dream Act Application, 2020 <https://dream.csac.ca.gov/>

system), the mere fact of calling or emailing admissions offices may represent psychological and compliance burdens.

About 76% of community colleges are highly flexible with citizenship and immigration documentation (coded as 0 and 1), which contrasts with the percentages that require documentation of residence (77.65%) and notarized affidavits (41.24%). This feature may be consistent with the in-state tuition policy, whose primary concern is to validate the state residency of undocumented youth. Although one might think that presenting a diploma or evidence of having studied in a state high school meets policy requirements, perhaps community colleges have required more documentation to avoid fraud or simply are following other institutional policies on residency. Indeed, according to a survey carried out by the American Association of Collegiate Registrars and Admissions Officers in 2018, 58.9% of admissions officers answered that they admit undocumented students only with evidence of a high school diploma under certain circumstances, while 41.1% responded that they requested more proof of residency. Simultaneously, 45.2% reported that they follow state policy requirements, while 37.8% said they follow their institutions' policy (AACRAO 2018).

Regarding underlying admissions variables, more than one-fourth of the institutions (26.01%) reported having designated admissions staff for undocumented students, and 47% note specialized guidance for undocumented students on their websites. One might expect that in community colleges, given their nature of open-access institutions serving diverse individuals, these percentages would have been higher. In the case of undocumented youth, given the amplified learning and psychological costs that this population faces, providing admissions guidelines and staff dedicated to serving them could positively affect enrollment rates.



**Table 2. Percentages (%) of Community Colleges by Level of  
Administrative Burden**

<b>Indicator/Level of Burden</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>
Application Fee	48.72	11.72	19.78	19.78
Social Security Number	16.12	38.46	38.10	7.33
Citizenship and immigration documentation	28.57	47.62	19.05	4.76
Residency	22.34	47.25	27.84	2.56
Tax forms	62.64	34.8	2.56	
Family information	65.2	33.7	1.1	
Vaccination Record/Health Records	69.23	30.4	0.37	
Notarized Affidavit	58.24	41.76		
Admissions Staff	26.01	73.99		
Guidance and Information Available Resources	47.62	52.38		
Form application language	29.67	70.33		

Application forms had total burden scores ranging from 4 to 18 ( $M = 7.7$ ,  $SD = 3.57$ ).

When examining administrative burden scores by state (Figure 1), the states with fewer requirements, more guidance, and overall, more flexible procedures are California (4.0), Colorado (5.6), and Illinois (6.0). In contrast, states with more administrative burdens in the admissions process are Maryland (11.8), Florida (11.7), and Nebraska (11.3). As mentioned earlier, many factors might account for these differences, including partisanship, with states that typically support Democrats and with more positive social constructions of undocumented immigrants (e.g., California, Illinois, Colorado, New York, Washington) differing from those more likely to support Republicans and with more negative social constructions of undocumented immigrants (e.g., Utah, Florida, Nebraska). Higher and lower administrative burdens are also evident in the estimated proportions of undocumented and whether the state has a standardized information system across the community colleges (e.g., New York, California, Illinois).

**Figure 1. Mean of Administrative Burden Score by State**

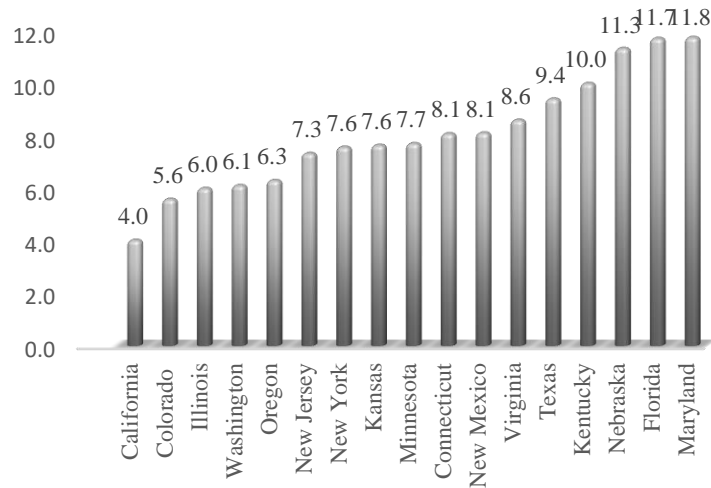


Table 3 presents the results of the regression models. Model 1 looks at the impact of indicators tapping the admissions requirements variables on enrollment rates. Model 2 adds underlying variables such as admission staff dedicated to serve undocumented students, website information displayed and language. Model 3 controls for tuition cost, availability of financial aid, and proportion of undocumented students at the college location. Notably, the SSN requirement is not associated with a decrease in enrollment rates. This finding, although unexpected, could be explained in several ways. First, most undocumented applicants to community colleges may be Deferred Action for Childhood Arrivals (DACA) recipients, who have temporary SSNs and residency status. Indeed, some studies suggest that undocumented youth who are not DACA recipients are less likely to apply for college; instead, they enter the labor market (Amuedo-Dorantes and Antman 2017). Second, one might expect that most community colleges have already adjusted their registration systems, considering the lack of SSNs for undocumented students.

Proof of residency and affidavits are requirements that are significantly associated with lower enrollment rates (30.59) and (63.02), respectively. These results suggest that higher documentation and residency requirements as well as notarized affidavits may be indicators of psychological and compliance burdens that affect undocumented students and could discourage them from applying for college. Model 3 shows that not having dedicated admissions staff serving undocumented students, forms in both languages (English and Spanish), and admissions guidelines are underlying indicators associated with decreased enrollment rates (36.94), (26.85), and (37.88), respectively. These findings also suggest that community colleges may shape administrative burdens through actions regarding what information to display online and share with undocumented students, what documentation validates residency, or if admissions officers

guide undocumented youth in completing the application process. These results also confirm previous studies' findings indicating the importance of guiding and supporting applicants when claiming public benefits (Bettinger et al. 2012).

**Table 3. Regression Models: Undocumented Student Enrollment Rates by Indicators of Administrative Burdens**

	(1)	(2)	(3)
Application Fee	11.02 (6.22)	9.56 (6.12)	13.23 (6.09)
Social Security Number	-9.06 (11.46)	-1.08 (11.43)	7.31(11.45)
Citizenship and immigration documentation	-14.28 (12.52)	-4.01 (12.43)	-5.44 (12.33)
Residency	-52.68 (10.21) *	-43.82 (10.60)*	-30.59 (11.05)*
Notarized Affidavit	-61.36 (17.16)*	-62.21 (16.85)*	-63.02 (16.67)*
Tax forms	-.81 (23.04)	2.30 (22.64)	-10.25 (22.88)
Family information	19.21 (23.65)	37.82 (23.60)	24.40 (23.89)
Vaccination or Health Record	-17.34 (17.63)	-12.34 (17.47)	-6.90 (17.98)
Admissions staff serving undocumented students		-34.39 (20.01)**	-36.94 (19.75)**
Admission guidance		-25.82 (18.77)**	-37.88 (18.45) *
Language of the application form		-39.17 (21.96)**	-26.85 (23.65)
In-state tuition cost			-0.01(0.02)
State Financial Aid			-61.31 (21.56)*
Proportion Und. Students			29.17 (11.21)*
Constant	66.34 (19.53)*	111.31 (22.92)*	156.48 (31.64) *
R <sup>2</sup>	0.16	0.21	0.25

Note. N = 273 Dependent variable = institutional first-time enrollment rate of nonresident alien students. Standard errors are listed in parentheses \* p < .05 \*\* p < .10.

Model 3 findings also show that not having state financial aid for undocumented students could also reduce the number of students enrolled by 61.3, which is expected considering that

financial constraints prevent undocumented students from attending college. Finally, a higher proportion of undocumented students in the state is associated with an increase in students enrolled by 29.17, which is consistent with previous studies that demonstrate positive relationships between potential claimants and acceptance rates (Herd et. al 2013).

It should be noted that not high correlation nor multicollinearity was found in independent variables. The results of the variance inflation factor (VIF) to analyze multicollinearity are presented in Table 4. All the results are less than 10, showing no multicollinearity between the explanatory variables (admissions requirements--administrative burdens for this study). See also correlation results (See Appendix G).

**Table 4. Analysis of Multicollinearity of Administrative Burdens**

Variable	VIF	1/VIF
Tax Forms	2.98	0.335993
Family Infor	2.8	0.35693
Citizenship	2.06	0.486203
Language	2.01	0.497842
SSN	1.83	0.546787
Information	1.69	0.592374
Admission	1.54	0.65088
Affidavit	1.38	0.725407
Health Records	1.35	0.740107
Residency	1.33	0.751631
Application fee	1.1	0.913145
Mean VIF	1.82	

However, in a bivariate analysis, the SSN requirement (IV) is statistically associated with a decrease in enrollment rates (DV) for 21 applicants ( $p < 0.05$ ). Yet, it should be noted that the r-squared is low in this bivariate analysis (see Table 7). But, when all the admissions

requirements are considered in the model, SSN requirement is not associated with a decrease in enrollment rates. This finding, although unexpected, could be explained in several ways. First, most undocumented applicants to community colleges may be Deferred Action for Childhood Arrivals (DACA) recipients, who have temporary SSNs and residency status. Indeed, some studies suggest that undocumented youth who are not DACA recipients are less likely to apply for college; instead, they enter the labor market (Amuedo-Dorantes and Antman 2017). Second, one might expect that most community colleges have already made adjustments to their registration systems, considering the lack of SSNs for undocumented students. Yet, in further research, it would be worthy to examine bivariate relationships for each individual admissions requirement.

**Table 7. Bivariate analysis: Undocumented youth enrollment rates and SSN**

```
. reg ProxyUndStudents SSN
```

Source	SS	df	MS	Number of obs	=	273
Model	84421.0791	1	84421.0791	F(1, 271)	=	5.13
Residual	4462720.05	271	16467.6017	Prob > F	=	0.0244
				R-squared	=	0.0186
				Adj R-squared	=	0.0149
Total	4547141.13	272	16717.4306	Root MSE	=	128.33

ProxyUndSt~s	Coefficient	Std. err.	t	P> t	[95% conf. interval]
SSN	-21.00335	9.276375	-2.26	0.024	-39.26627 -2.740428
_cons	114.261	14.86469	7.69	0.000	84.99603 143.5259

### Limitations

This study has the following limitations. First, the cross-sectional data gathered to examine and code the college admissions forms are from 2020. Since the application forms may vary from term to term, there could be minor changes in the administrative requirements, altering the findings if the study is replicated in the near future.

Second, no public data report undocumented immigrants. Therefore, scholars construct proxies for undocumented status, which could misrepresent such populations (Van Hook et al. 2015). For instance, this study uses a proxy for the enrollment rates of undocumented immigrants, which could confound legal immigrants classified as “non-resident aliens” who pay in-state tuition for different reasons (e.g., they have permit residency, hold green cards, are refugees, or live-in other states and study at community colleges as part of an interstate partnership).

Third, since no data at the institutional level shows applications vs. acceptances rates, this model assumes that the acceptance and enrollment rates are close. This assumption is made considering that the analysis was carried out in community colleges--open-access institutions--where the acceptance rate is 85%. This rate may imply that those who apply have a high chance of being accepted. Therefore, the enrollment rates (dependent variable in this model) should be close to the application rates. However, given the lack of evidence in public data in this regard, such an assumption could be erroneous and skew the results of the impact of burdens on the proxy of undocumented youth enrollment rates.

Fourth, not examining application forms for four-year colleges and universities could skew the results regarding burdens. One might expect that in four-year institutions, the admissions processes would be more selective, and perhaps the compliance and psychological barriers would be greater (Butler, Madden and Smith 2018; Zwick 2019). For example, questions and requirements associated with SSN, citizenship, residency, and taxed income could be more extensive. This is a major limitation when comparing burdens across two and four year institutions. Further research might look for patterns and differences in burdens among two- and four-year institutions. However, since undocumented youth primarily apply to community

colleges (Nienhusser 2014; 2018; Teranishi, Suarez-Orozco and Suarez-Orozco 2011), the findings in this study illuminate the administrative burdens that this population faces in institutions that are mainly called to serve underrepresented students.

Another limitation lies in the lack of comparison of enrollment rates of undocumented youth with other groups, such as U.S. citizens of varying races. It would also be meaningful to compare with first-generation college students who are citizens or permanent residents; however, there is not public data that count first-generation college students' enrollment rates at the institutional level. The analysis and comparison with different groups would help to clarify whether the colleges with fewer administrative burdens for undocumented students enroll higher percentages or other target groups, or this is a phenomenon that is specific to undocumented students.

## **Conclusion**

When implementing ISRT policy, higher education institutions become the epicenters tackling federal, state, and institutional policies. They, also, turn into the agents shaping administrative burdens when undocumented immigrants apply for college and claim ISRT benefit. The findings point to multiple approaches to compliance with ISRT policy, underscoring how power and administrative discretion can achieve or block policy goals.

Administrative burdens in the college application process evidently affect the desire and ability of undocumented students to access higher education. Although the requirements necessary to benefit from ISRT policy are relatively similar across the states, distinct admissions requirements evidence how those who manage policy implementation and access to benefits may limit participation, despite undocumented students' eligibility. How administrative burdens vary



considerably within states and institutions in providing the same policy benefit to undocumented students is a subject deserving of further research. Yet, variation in admissions requirements may be a means for hidden politics, a deliberate and intentional restriction to those benefiting from a public benefit (Herd and Moynihan 2018), here in-state tuition policy for undocumented youth.

Public administration scholars have highlighted the relationship between administrative burdens and perceptions of target groups' deservingness (Baekgaard, Moynihan, and Thomsen 2021; Bell et al. 2020; Mettler 1998; Schneider and Ingram 1993, 1997; Sidney 2003). As a result, higher education institutions may apply a criterion of "deservingness" (Baekgaard, Moynihan, and Thomsen 2021; Bell 2020; Schneider and Ingram 1997), particularly in a country where undocumented immigrants' access to public benefits is highly contested. Thus, political actors may shape what they perceive to be "appropriate" burdens in the admissions process that vary with the dominant perception of deservingness in particular states or institutions, regardless of the specific provisions of the ISRT policy. In states where undocumented students may be perceived as "undeserving" (e.g., Florida, Texas, Nebraska), the level of administrative burdens imposed for applying to college and benefiting from ISRT is higher. In contrast, in states that may perceive undocumented students as "deserving," admission rules and procedures show a lower level of burdens (e.g., California, New York, Washington, Colorado).

The changing landscape of national, state, and institutional policies affecting undocumented immigrants regarding providing or restricting ISRT will likely grow in the near future as reforms and policies continue to be enacted for a such population. Then, higher education institutions may continue to grapple with their role as policy implementers and mediators between requirements at different levels and undocumented population complexities.

Future scholarly work should explore the role of organizational environment constraints that could influence how higher education institutions establish rules. Indeed, the importance of an organization's, particularly rules imposed by other organizations when ISRT policy is implemented, frame actions.

## CHAPTER FOUR

### ADMINISTRATIVE BURDENS WHEN UNDOCUMENTED STUDENTS APPLY TO COLLEGE AND CLAIM ISRT

#### Abstract

Undocumented immigrants face learning, compliance, and psychological burdens when they apply to college. Navigating the college admissions process and claiming in-state resident tuition (ISRT) often can be onerous due to their unlawful status, general lack of social and cultural capital, and higher opportunity costs. Building on administrative burdens scholarship and using both qualitative and quantitative data from interviews and surveys of undocumented youth, this article examines and probes these costs. This study adds to administrative burdens scholarship by exploring how non-U.S. citizens experience administrative burdens when claiming a public benefit and the factors that may shape such experiences. The findings suggest that undocumented youth navigate multifaceted institutional contexts, including multiple rules at different organizational levels and interactions with admissions officers whose attitudes may facilitate or obstruct access. The study suggests that both policymakers and implementers should consider psychological factors that may affect most individuals and influence their behavior when they claim public benefits.

## Introduction

Policies aimed to grant public benefits to target populations often include administrative burdens. The mere fact that the policy design includes eligibility criteria implies establishing administrative procedures and rules for participants to apply. The rationale behind those rules may respond to calls for greater efficiency and effectiveness (Adams and Balfour 1998), fraud prevention, maximization of expenditures of public resources (Doughty and Baehler 2020), or heightened accountability and fairness (Goodsell 1977). Yet, some bureaucratic procedures and rules also may respond to value-based criteria and rationalize the allocation of scarce public resources to the most “deserving” individuals (Baekgaard, Moynihan, and Thomsen 2021; Herd and Moynihan 2018; Moynihan, Herd and Harvey 2015).

In the United States, undocumented immigrants can access public higher education and benefit from in-state resident tuition (ISRT) policy in 19 states that have legislated such a public benefit. In some of those states, undocumented students also may receive state financial aid (see Chapter One). Further, some higher education systems located in states without legislation in place have granted ISRT benefits as well.<sup>16</sup> Overall, undocumented students can benefit from ISRT if they have lived in any of those states between two and three years, have attended and graduated from a state high school, and have a notarized signed affidavit stating that they will seek legal permanent residency when possible (Amuedo-Dorantes and Sparber 2014; Nienhusser 2014).

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<sup>16</sup> “University of Hawaii Board of Regents, Kentucky Council on Postsecondary Education, University of Maine Board of Trustees, University of Michigan Board of Regents, Ohio Board of Regents, Oklahoma State Regents for Higher Education and Rhode Island Board of Governors for Higher Education.” (NCSL, 2021, p.1)

Allowing undocumented students to pay ISRT or receive state financial aid constitutes a public benefit and a mechanism of equalization with citizens and legal residents who automatically pay in-state tuition rates in the states they have resided and studied. In states and institutions without such policies, undocumented students must pay out-of-state tuition, which can be three times the cost of in-state tuition. Since undocumented students regularly come from lower-income families and have higher poverty rates (Diaz-Strong et al. 2011; Kaushal 2008), in-state tuition constitutes a public benefit that extends higher education opportunities to such a population. Studies have demonstrated that if undocumented students cannot claim such public benefits, their ability to attend college is reduced (Kaushal 2008; Nienhusser 2013).

Although some states have adopted ISRT policies and the eligibility requirements seem simple to meet, bureaucratic procedures and rules at the institutional level may be highly burdensome for undocumented youth. Furthermore, specific bureaucratic procedures may keep them from applying, delay their educational opportunities, or result in higher learning, compliance, and psychological costs that citizens and legal residents do not confront. Such heightened burdens may result from individuals' features, organizational factors, and negative perceptions of undocumented immigrants' deservingness of public benefits.

Undocumented youth's unlawful status, their frequent condition as first-generation college students, their lack of financial resources, and generally lower cultural and social capital could intensify their perception of facing an overwhelming and frustrating process when navigating college applications and claiming ISRT. Moreover, the lack of synchronization between eligibility criteria for ISRT and the requirements at individual higher education institutions may make the experience especially daunting for undocumented immigrants claiming

ISRT benefits. These experiences also may reflect additional requirements or more stringent applications based on negative social constructions of this population.

Previous research discusses the challenges undocumented students face when accessing higher education and determining whether they qualify for ISRT or financial aid at the state and institutional levels (Enriquez 2011; Nienhusser 2014; Serna, Cohen and Nguyen 2017). Both the stigma and fear associated with their status may lower their propensity to claim ISRT (Abrego and Gonzales 2010; Abrego et al. 2017). Little scholarly work, however, focuses specifically on *how* they experience administrative burdens as learning, compliance, and psychological costs or the factors that may influence the variation of such experiences.

Building on administrative burdens scholarship, this manuscript examines learning, compliance, and psychological costs when undocumented individuals apply for admission to public colleges and claim in-state resident tuition benefits in the states where they are available. The analysis relies on information from undocumented students collected in 2020 through 19 semi-structured interviews and 136 online surveys. This study adds to the administrative burdens of scholarship by exploring how a distinct group—undocumented immigrants applying to colleges—experience administrative burdens when claiming a public benefit and the factors shaping such experiences. It also demonstrates how administrative burdens may reinforce existing social inequalities and disproportionately affect individuals who are less well-positioned to address such burdens.

The findings suggest that undocumented immigrants navigate multifaceted institutional contexts, including multiple rules at different organizational levels and interactions with admissions officers whose beliefs about undocumented immigrants may affect their commitment to facilitate or obstruct access during efforts to qualify for ISRT. The implications for public

administration scholarship and practice suggest that claiming public benefits is governed by psychological as much as by economic reasons, indicating that policy implementers and institutions should consider factors that influence individual behavior when claiming benefits.

In the following sections, I elaborate on the impact of administrative burdens on individuals when they claim public benefits. Then, I present the study's research design and discuss the qualitative and quantitative findings. In doing so, I also identify factors that may alleviate administrative burdens faced by them. Next, I briefly highlight recommendations made by undocumented youth regarding making less burdensome the college application process. Finally, I present conclusions and explore implications for theory and practice in public administration.

### **Individual Experiences of Administrative Burdens**

Some entitled individuals do not access public benefits from which they could participate (Currie 2006). Individuals entitled to certain program benefits may perceive associated bureaucratic rules and procedures as burdensome or feel discouraged from participating. Studies in both behavioral economics and social psychology suggest that the impact of administrative rules is subjective and depends on individual circumstances. Theoretical and empirical work has found several reasons for reduced numbers of those claiming public benefits and variation in individual experiences. Some reasons include lack of awareness of public benefits (e.g., Chetty, Friedman and Saez 2013), confusion about and poor understanding of requirements and procedures (Liebman, Erzo and Luttmer 2015; Christensen et al. 2020), higher transaction costs (Currie 2006), analysis of trade-offs between costs and benefits (Craig 1991), the stigma associated with participating (Baumberg 2016; Herd and Moynihan 2018), and emotional stress

of completing requirements and interacting with bureaucratic personnel (Bertrand, Mullainathan and Shafir 2006; Herd and Moynihan 2018).

These sorts of learning, compliance, and psychological costs that individuals experience when accessing public benefits are what public administration scholars have called administrative burdens (Herd and Moynihan 2018; Moynihan, Herd and Harvey 2015). Research on administrative burdens scholarship has focused on understanding why individuals who are entitled to public benefits do not claim them and how the established bureaucratic requirements and rules to access such benefits may affect non-participation (Burden et al. 2012; Herd and Moynihan 2018; Moynihan, Herd and Harvey 2015). Furthermore, scholars have explored how individuals' experiences when claiming public benefits may shape their civic engagement, political participation, and future interactions with the administrative state (Mettler 2002; Soss 1999).

*Learning* costs refer to the time and effort required to find out about a public program and associated eligibility criteria along with necessary supporting paperwork. *Compliance* costs involve the forms applicants should complete and the documentation they must provide as well as the fees they must pay to apply for public benefits. *Psychological* costs include the possible stigma of claiming a public benefit and the emotional stress and frustration of dealing with street-level bureaucrats who hold administrative power to accept or reject applications for benefits (Moynihan, Herd and Harvey 2015; Herd and Moynihan 2018).

Learning about public benefits is not necessarily straightforward. Not all individuals have the same cognitive resources; nor do they understand and interpret information in the same way. For instance, eligible individuals who could benefit from the federal earned income tax credit (EITC) do not claim it due to a lack of knowledge (Goldin 2018; Plueger 2009; TIGTA 2018).



Similarly, in signing up for health insurance, evidence shows that lack of program knowledge and misinterpretation may hamper coverage (Kenney, Haley, and Dubay 2001). In addition, some individuals lack the requisite cultural and social capital, which may shape their learning and limit their access to public benefits.<sup>17</sup>

Compliance costs can be both tangible and intangible. Tangible costs include the spending associated with applications, transportation to program' facilities, and acquisition of needed documentation. Intangible costs include the time required to gather documentation, wait in lines, and make calls and the associated loss of paid work hours. Both tangible and intangible costs disproportionately affect low-income individuals who may be more affected by opportunity costs, including the time needed to apply and meet requirements, varying incomes, tight budgets, and long commutes and transportation fees (Banerjee and Mullainathan 2010). Indeed, previous empirical studies show that potential beneficiaries of the Supplemental Nutrition Assistance Program (SNAP) decided not to participate because of the paperwork and documentation involved and the considerable amount of time to apply (Bartlett, Burstein, and Hamilton 2004; Herd 2015).

As noted previously, psychological costs refer to those associated with the stigma and emotional strain of participating in a public benefit and the frustration of dealing with street-level bureaucrats. Levinson and Rahardja (2004) found that attitudes about the stigma of receiving welfare are associated with lower participation rates. Allen et al. (2014) found, however, that in

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<sup>17</sup> Cultural capital refers to the transmission and accumulation of experiences, values, and familiarity with dominant social norms that allow people to make beneficial decisions (Wells 2008), while social capital refers to the skills that enable individuals to follow norms, formal guidance, and social controls (Dasgupta and Serageldin 2000; Christensen et al. 2020). Both contribute to increasing participation in public benefits.

some programs stigma was not associated with socioeconomic factors or the shame of being poor. Instead, stigma resulted from “demeaning” interactions between street-level bureaucrats and clientele.

Although psychological burdens are complex to measure, identifying them is crucial for understanding reasons for not applying for public benefits beyond compliance costs. For instance, some social psychologists observe that when disadvantaged individuals must make crucial decisions, they are more likely than others to become discouraged and sometimes avoid deciding at all (Beattie et al. 1994). Some individuals may make "irrational" decisions under uncertainty (Kahneman and Tversky 1979), or they may make inconsistent decisions—those far from their preferences—because of limited autonomy (Laibson 1997).

It should be noted that learning, compliance, and psychological burdens differ conceptually, but they cannot be understood separately. For example, when individuals apply for a public benefit, they may encounter confusing or insufficient information. In the process of learning about eligibility criteria, they also may discover the need to complete paperwork and provide specific documentation. Doing so may exacerbate their emotional stress and induce feelings of fear and frustration. Additionally, while learning and dealing with stress, they must gather the documentation, take time off work, approach the offices that issue needed documents, deliver the documentation, have interviews, and interact with street-level bureaucracies. Thus, they may experience learning, psychological, and compliance costs simultaneously.

#### *Unique Burdens Faced by Undocumented Immigrants*

Some target populations, including first-year generation and minority students, are more affected than others by learning, compliance, and psychological burdens when they apply to

college and seek a public benefit. The challenges and burdens for undocumented students, however, are unique. For instance, unlike first-generation students, many undocumented youth are highly discouraged by some of their high school counselors to pursue higher education given their unlawful status, as this study found in most of the interviews reports. That applying to college and claiming in-state tuition or financial aid are especially burdensome given their unlawful status and their perceptions of being "outsiders" despite their acculturation in the American system.

When applying for college, many undocumented youth confront their unlawful status for the first time. A first-generation student—who is a citizen or legal resident--will not experience emotional strain trying to figure out how to provide the SSN or how to prove citizenship. They, by right, already have SSN and birth certificates. Much less, a first-generation student will have to provide documentation related to a passport, visa, or some legal authorization document. In the end, first-generation students will not be exposed to the scrutiny that undocumented youth face. One might assume that for first-generation students, providing evidence of their high school transcripts and diploma prove their residency, and therefore, entitlement to ISRT. For undocumented immigrants, the story is different, as evidenced in chapter four of the dissertation. Furthermore, college personnel and admissions officers do not have to figure out "what to do with first-generation students' application" because first-generation students do not apply to an ISRT policy aimed at them; their citizenship and state residency automatically make them deserve to pay in-state tuition rates. For undocumented students, the story is totally different. The ISRT policy is ambiguous and subject to several interpretations. Despite having resided and studied in a state-high school, they have to make multiple efforts to demonstrate that they "deserve" to pay state tuition when such benefit is available.

Most important, undocumented youth propensity for applying for college is shaped by fear of deportation for themselves or their families. Many of the participants in this study highlighted this trade-off, questioning whether it was worth putting themselves and their parents at risk to seek higher education opportunities. It should be noted that no other population group experiences such fear and thinks about risks to themselves and others when applying to college. Beattie et al. (1994) found that individuals are more likely to not make decisions when their decisions might significantly affect loved ones or when there is a high chance of a negative outcome. This in turn leads one to expect that some undocumented youth will be deterred from applying at all.

Not only do the unique challenges and paperwork that undocumented youth confront shape their propensity to apply, but their acceptance also may be delayed or contested due to the lack of certain required documents (e.g., SSNs, residency identification cards, tax forms, unexpired passports, and visas). College admissions officers and others often may view such documents as technical prerequisites for receiving the ISRT policy benefit. In contrast, as noted previously, first-generation applicants who are citizens or permanent residents either do not have to provide this information, or it is relatively easy to acquire. For instance, in states where undocumented students must provide immunization records for admission, some undocumented students may not apply because they do not have such records. That information may be impossible to secure from their countries of origin, or they may never have had health insurance coverage in the United States.

In states that request proof of residency, such as a resident identification card or driver's license, undocumented participants may be frustrated since such documentation depends upon an individual's legal status (e.g., Virginia, Florida, Maryland, Nebraska), and it can be supplied only

by citizens or legal immigrant. Furthermore, when undocumented students must provide tax forms or evidence of income either for themselves or for their parents, meeting this requirement may be difficult. Some undocumented immigrants do not have these documents as they work "under the table." Other undocumented immigrants work with fake SSNs, making provision of evidence of income or tax forms risky.

At the same time, in the course of the application process, the deservingness and sense of belonging of undocumented applicants may be questioned in ways that other population groups do not experience or may experience differently. Undocumented youth realize that they are socially differentiated from citizens and legal residents through this official encounter with public organizations such as colleges and universities and the availability or absence of policies directed towards them.

Besides, other invisible barriers that matter exist in the college application process; Muñoz and Maldonado (2012), for example, found that factors such as language, phenotype, geographical origin, and level of acculturation result in additional obstacles to post-secondary education access. Nonetheless, the stigma that surrounds undocumented immigrants evidently differs from that affecting other target groups. For the undocumented, the stigma likely goes beyond the "shame" of asking for help or acknowledging that navigating the college process and meeting requirements is overwhelming as other lower-income or first-generation applicants might experience. For many undocumented youth, their presence suggests "otherness" and "being unfit." Further, stereotypical language and media narratives frequently reinforce that stigma. Perez et al. (2009) asserted that many undocumented immigrants face three stigma-linked burdens: Hispanic ethnicity and culture, lack of citizenship, and low socioeconomic

status. These conditions may magnify psychological burdens when this target group applies for college.

Considering the previous description of varying administrative burdens that undocumented youth may face when accessing ISRT public benefit, the following section describes the research design I used to study such burdens when a such population seeks college access and the public benefit in-state resident tuition.

### **Research Design**

To investigate the administrative burdens undocumented students cope with while applying for college and claiming eligibility for ISRT, I conducted 19 interviews with and administered 136 anonymous online surveys to undocumented students residing and/or studying in states that granted ISRT in 2020.<sup>18</sup> To locate potential participants, I contacted undocumented students through interactions with high school and college admissions counselors, and I sent invitations to Dreamer and DACA groups located in different states and registered on social media platforms, particularly Facebook.

The interview questions focused on undocumented applicants' experiences and challenges with college admissions, the procedures and rules they confronted in demonstrating eligibility for ISRT, and any social-emotional stigma from being undocumented. No in-person interviews were conducted; instead, interviews were carried out through Zoom meetings during 2020. All interviews were audio-recorded. The invitation to participate anonymously in the online survey posted on the VT Survey Qualtrics link was sent to groups of undocumented

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<sup>18</sup> The interviews followed IRB protocol 18-689, and the online surveys followed IRB protocol 20-477 (see surveys templates in Appendix H).

immigrants registered on Facebook such as “DACA Dreamers,” “United Dreamers,” “Undocumented and Unafraid,” and “Undocumented Students in Higher Education.” One hundred thirty-six (136) surveys were received, but the number of answered items per participant varies. The survey included questions about respondents' profiles, such as their country of origin, age, gender identity, U.S. state of residency, and time spent living in the United States. Most of the questions focused on undocumented students' perceptions of the admissions process, including the learning process, administrative steps involved in completing forms and their levels of concern about meeting requirements. Other questions asked about academic counseling in the admissions process, interaction with admissions officers, and suggestions for improving the admissions process.

## **Data Description**

- **Interviewees**

Table 1 presents the profiles of those interviewed. Eleven women and eight men participated; their average age is 22 years old. They arrived in the United States at the average age of 4 years old, and on average they had lived in the country for almost 18 years. The majority of the participants are from Mexico (70%), and most of those interviewed live in California, Texas, and Virginia. Eleven interviewees are currently enrolled in 4-year institutions, five attend community college, and three are not currently studying at any higher education institution. Sixteen (84%) are DACA recipients, and the remaining individuals had been rejected from the program. As Chapters One and Two mentioned, being a DACA recipient makes

attending college and getting a job more plausible options.<sup>19</sup> Seventeen (90%) of the participants are first-generation college students.

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<sup>19</sup> DACA status gives undocumented youth lawful temporary residence; it must be renewed every two years (Benuto et al. 2018).



**Table 1. Profile of Interview Respondents**

<b>No</b>	<b>Gender Identity</b>	<b>Age</b>	<b>Country Origin</b>	<b>Years Living in the U.S</b>	<b>Age Arrival</b>	<b>State Residency</b>	<b>College</b>	<b>Program</b>	<b>Type of Institution</b>
1	Woman	23	Mexico	23	1 month	California	University of California, Santa Barbara	Public Policy	4 yrs.
2	Man	22	Mexico	20	2	Utah	University of Utah	Political Science	4 yrs.
3	Man	25	France/Vietnam	24	1	Minnesota	University of Minnesota	Psychology	4 yrs.
4	Woman	23	El Salvador	19	4	Virginia	Don't want to say	Health Science, Nursing	2 yrs.
5	Woman	19	Mexico	18	1	Texas	Amarillo Community College	Radiology	2 yrs.
6	Woman	23	Mexico	16	7	California	Palomar CC/University of California San Diego	Political Science/American Politics	4 yrs.
7	Man	24	Mexico	15	9	California	University of California, Irvine	Psychology	4 yrs.
8	Woman	24	Canada	20	4	Virginia	Not enrolled yet	N/A	N/A
9	Woman	20	Mexico	9	11	Texas	Amarillo Community College	Elementary Education	2 yrs.
10	Man	23	Mexico	20	3	Illinois	Iowa CC/University of Illinois	Engineering	4 yrs.

11	Man	21	Mexico	10	11	Texas	University of Texas	Mechanical Engineering	4 yrs.
12	Woman	23	Mexico	21	2	Colorado	Colorado Mountain College	Nursing	2 yrs.
13	Woman	22	Mexico	17	5	Texas	Amarillo Community College	Business Administration	2 yrs.
14	Man	20	Mexico	13	7	Texas	West Texas A&M University	Music Education	4 yrs.
15	Man	20	Mexico	16	4	Texas	Ohio State University	Psychology	4 yrs.
16	Woman	21	Mexico	19	2	Texas	Amarillo Community College	Nursing	2 yrs.
17	Woman	23	Mexico	19	4	Utah	University of Utah	Political Science	4 yrs.
18	Woman	23	Venezuela	20	3	Virginia	George Mason University	Public Relations	4 yrs.
19	Woman	24	Venezuela	22	2	Virginia	Not yet enrolled	N/A	N/A

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## Survey Respondents

Tables 2 and 3 present descriptive statistics for the survey respondents. Over 60% are from Mexico; 17.65% and 8.82% are from South and Central America, respectively, with 3.68% from Asia and 1.47% from Europe.

**Table 2. Survey Respondents by Country of Origin**

<b>Countries of Origin</b>	<b>N</b>	<b>Percent</b>
Mexico	82	60.29
El Salvador	9	6.62
Bolivia	8	5.88
India	5	3.68
Colombia	4	2.94
Argentina	4	2.94
Peru	3	2.21
Venezuela	3	2.21
Costa Rica	3	2.21
Honduras	2	1.47
Spain	1	0.74
Brazil	1	0.74
Canada	1	0.74
Dominican Republic	1	0.74
Ecuador	1	0.74
France	1	0.74
Haiti	1	0.74
No answer	6	4.41
Total	136	100

The average age of those who responded to the survey was just over 23 years old, with 70% between the ages of 17 and 23. The majority of the respondents were women (74.4%). Around 91% are from Hispanic origin. About 71% of the participants have lived in the United States for more than 15 years, with fewer than 11% having lived in the country for less than five years.<sup>20</sup> Similar to the interviewees, most of the survey respondents (about 84%) are first-generation college students, consistent with previous studies (Gildersleeve and Ranero 2010; Ruth 2018). About 71.43% of the respondents are DACA recipients, with the remainder ineligible (11.90%), in process (3.97%), rejected (3.97%), and “other” (8.73%).

Of those who responded to the survey, 57.03% are currently enrolled in an institution of higher education. Of these, just under 40% attend community colleges, with the rest enrolled in 4-year institutions.<sup>21</sup> Of those who have attended or are currently enrolled in college, 22.92% have been enrolled less than a year and 37.5% between one and three years, with close to 5.21% having attended for more than five years.<sup>22</sup>

<b>Variables</b>	<b>N</b>	<b>Mean or %</b>
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<sup>20</sup> Respondents to both interviews and surveys are similar to those in previous studies that report that undocumented immigrants have resided in the country for a long time, between 10-15 years on average (Taylor et al. 2011).

<sup>21</sup> Some of those who currently attend a four-year institution may have been enrolled earlier in a community college, but the survey did not collect this information.

<sup>22</sup> This last result is higher compared with other population groups such as White and Asians whose enrollment in a higher education institution generally is not this long (Hsin and Reed 2020).

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<b>Age</b>	136	23.52 years
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**Gender Identity**

Woman	93	74.4
Men	27	21.6
Transgender	3	2.4
Prefer no answer	2	1.6
Total	125	100

**Ethnicity**

Hispanic	114	91.2
White	3	2.4
Asian	5	4
African American	2	1.6
Other	1	0.8
Total	125	100

**Time Lived in United States**

Less than 5 years	7	5.6
Between 5 - 10 years	7	5.6
Between 10-15 years	22	17.6
Between 15-20 years	54	43.2
More than 20 years	35	28
Total	125	100

**Parents Educational Attainment**

No schooling completed	61	50
High school graduate	30	24.59

College or some college	27	22.13
Graduate degree	4	3.28
Total	122	100

**DACA Status**

Yes	90	71.43
No	36	28.57
Total	126	100

If not DACA status,  
why?

Not eligible	15	11.9
In the application process	5	3.97
Rejected	5	3.97
Other	11	8.73
Subtotal	36	28.57

**Currently Enrolled  
Higher Education**

Yes	73	57.03
No	55	42.97
Total	128	100

**If enrolled, type of Institution**

Two-year community college	27	36.98
Four-year college or university	46	63.02
Subtotal	73	100

**Time Enrolled as student  
in higher education  
institution**

Less than 1 year	22	22.92
Between 1 - 3 years	36	37.5
Between 3 - 5 years	18	18.75
More than 5 years	5	5.21
Not enrolled yet	16	15.63
Total	96	100.01

### **Data Analysis**

The interview and survey responses were analyzed separately. In what follows, the findings are discussed together when they yield similar results or confirm common patterns. Examination of the interview data employs qualitative analysis, while most survey data are analyzed statistically. Both instruments focused on the learning, compliance, and psychological burdens that undocumented immigrants face when they apply to college and claim ISRT.

Following Moynihan et al. (2015) in examining features of administrative burdens facing individuals claiming public benefits, I identified and coded learning, compliance, and psychological costs in each interview, using questions aimed at identifying specific burdens.<sup>23</sup>

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<sup>23</sup> To tap learning costs, some of the following questions were asked: How do you describe the learning process when applying for college/university? Did you receive any academic counseling in high school? Who did guide you? What were your sources of information and guidance? How did you know/learn about the ISRT policy benefit and eligibility criteria requirements for undocumented youth? Did you receive any guidance from admissions officers? If so, how do you describe the information you received? For compliance costs, questions included: How do you describe the experience of meeting the ISRT requirements and following rules? What requirement/paperwork did you find challenging to meet? Did you have any inconvenience of being categorized as ISRT? If so, how did you face it? How long did you take to gather documentation and complete the process? To find out about psychological costs, I asked questions such as: What kind of feelings/emotions did you have when applying for college and claim ISRT? In general, what challenges, barriers, and concerns did you have when applying? How do you describe your interaction with the admission/staff officers? Did you get responses to your concerns in a reasonable time?

For learning burdens, I considered items such as sources of information about and guidance for applying to college and qualifying for ISRT, the time it took to understand criteria for policy eligibility, and the people involved in the learning process. I examined tangible and intangible costs of compliance burdens, including gathering documentation, meeting requirements, completing paperwork, paying fees, and the time spent running errands, having interviews, and waiting for responses from admissions officers. Psychological costs included fear of applying, emotional distress, interaction with admissions officers, and the social stigma of participating. I also noted individual and institutional factors that may have made the application process easier or more burdensome.

To analyze the survey data, I began with descriptive statistics and examined respondents' perceptions of administrative burdens for each type. Similar to the interviews, the surveys asked questions designed to identify the extent of learning, compliance, and psychological burdens. Individuals responded by rating on a five-point Likert scale their levels of stress, concern, or difficulty as they sought to meet requirements for application and eligibility for ISRT. (See Survey Template in Appendix A.)

Then, I examined relationships between and among these perceptions of burdens as well as the relationships between these burdens and respondent characteristics and the type of institution to which they applied. Participants in both interviews and surveys offered recommendations for fellow undocumented students pursuing higher education (See Appendix I).

## **Results**

Table 4 summarizes material from the interviews organized by learning, compliance, and psychological costs.



**Table 4. Interviews: Patterns of Administrative Burdens**

Burdens	Patterns
Learning	<ul style="list-style-type: none"> <li>• Lack of encouragement to pursue college.</li> <li>• Lack of high school guidance and information regarding ISRT.</li> <li>• Lack of information and guidance by admissions officers</li> </ul>
Compliance	<ul style="list-style-type: none"> <li>• Overlapping administrative requirements at different organizational levels.</li> <li>• Categorization as out-of-state instead of in-state</li> <li>• Additional documentation not required by ISRT policy</li> <li>• Back and Forth</li> <li>• High opportunity costs</li> </ul>
Psychological	<ul style="list-style-type: none"> <li>• Perception of an unfair admissions process</li> <li>• Fear of putting parents at risk</li> <li>• Complex interactions with admissions officers.               <ul style="list-style-type: none"> <li>○ Long waiting period</li> <li>○ Feelings of fear and frustration</li> <li>○ Feelings of being treated as undeserving</li> </ul> </li> </ul>

**Learning Burdens**

The learning process for undocumented students, including knowing about college applications and the possibility of benefiting from ISRT and state financial aid, does not begin at the college application stage. Rather, it starts in high school. Hossler and Gallagher (1987) found that the search stage of making college choices demands information and support from parents,

high school staff, and social networks. Some scholars argue that certain conditions should be met during the college learning process: encouragement from high school staff and deployment of all technical and financial information needed for the application process (McDonough and Calderone 2006).

Since most undocumented youths are first-generation college students (Alissa 2018) and they cannot take advantage of their parents' experience to navigate the college admissions process, one might expect that they would rely mostly on high school staff counselors, social networks, and admissions officers to help them make decisions about college. Participants noted how confusing learning about college options and processes is given their limited access to information, guidance, and assistance from parents, high school counselors, and admissions officers. One respondent observed:

*My parents didn't know anything at all about those types of stuff (college application). So it was it was pretty hard... Everything was me figuring out everything myself and not having someone to guide me through the process. That took me a long time, probably two months or so because there was a lot of confusion with them (admissions officers) not knowing what that is. That made it really confusing and they weren't sure what paperwork they needed for me. P#4*

*I couldn't ask for my parents help because “ellos no sabian” (They did not know it), and I also was too afraid to ask for help by any counselor or guidance from anyone else because I just did not want to be out there and disclose my status, or just have conversations in general about things like that, so it was very challenging P#7*

*I had a friend that was in the same situation as I was (applying for college). He was one year older than me, and so he had to go through it (the application process). But he didn't really go through it because when he approached a counselor at high school, the counselor basically called the patrol and they deported him and his family. That was shocking for me, and I was a little dramatic. P#11*

Studies also have shown that first-generation college students are less likely than their peers to interact with high school and college admissions staff (Terenzini et al. 1996; Nunez and Cuccaro-Alamin 1998). This lower level of interaction may affect persistence in the college application process.

In this study, most respondents emphasized that high school staff discouraged them from pursuing higher education; they also reported a lack of timely and accurate information about the college application process.

- **Lack of encouragement to pursue college**

Although it might seem that the learning stage has little to do with encouragement or individual motivation to learn, this matter. Social psychologists have found that individuals typically are not interested in learning about something that could benefit them if they previously did not have a "trigger" that impelled them to do so (Schie et al. 2015). Sixteen of the interviewees recalled instead that they were discouraged from pursuing higher education due to their unlawful status.

*Let me tell you it was horrible...my high school counselor, when I told her about my immigration status I had, she completely said: "Students like you do not attend higher education, they go to community college if they're lucky." I think it was a mixture of bias and ignorance because I told her the dream institution I wanted to go to, it is one of the top universities in California, and so I think that's where it came out of I told her I wanted to apply. It's called University of California, Santa Barbara and she told me that they didn't accept students like me, that you had to be documented in order to attend a college, because it was basically impossible for me to attend. I am a first-generation student, I'm undocumented as well, so I didn't question her (P#1).*

For another:

*During high school, I got not much guidance, honestly. I was discouraged. Looking back, I didn't know if I was going to be able to access college. And I think back the tuition charged was still out of state. So I just didn't think about going to college. And then, they (state level) passed the law that they let DACA immigrants, you know, had in-state tuition and that's when I started looking into it. I didn't remember I did receive some counseling back then. But most of them were for four years institutions only. And that wasn't going to be an option for me, because it wasn't something I was not going to afford (P#4).*

- ***Lack of awareness and information about ISRT***

Various studies have pointed out that undocumented youth do not receive reliable information about the college admission process (e.g., Nienhusser 2013). This lack of accurate information may be due to the lack of familiarity of high school counselors and college admissions officers with state or institutional policies for undocumented students, a lack of interest in helping such students, or bias. Seventeen interviewees did not know about college admissions processes and requirements for qualifying for ISRT. Most participants suggested that the learning process felt like walking "blindly" and "by themselves." One interviewee noted:

*The process itself is a little bit blurry because like I've said, it's kind of been different pieces. Some people would say: "Oh, you may be able to qualify for ISRT", but others said the opposite. So eventually, I figured it out right like I had to google things cause I had a counselor telling me things, I had teachers saying other things. So, I had to look for undocumented groups that I knew existed around San Diego to check it out. So I guess it was after a lot of research, but I think it wasn't as readily available as I had hoped (P#6).*

- **Lack of information from and guidance by admissions officers**

Several studies show that receiving information from those knowledgeable about program requirements and managing the procedures and rules to access public benefits are crucial in increasing participation. For instance, Chetty and Saez (2013, 3) found that providing

information about the Earned Income Tax Credit (EITC) from tax professionals had a greater impact on claimants than providing information informally such as in mailing brochures.

Similarly, Bettinger et al. (2012) found that providing both information and personal assistance about college financial aid increased college enrollments. Likewise, Aizer (2007) found that assistance with applications increased signing up for public health insurance coverage.

Schanzenbach (2009) found similar results for participants applying for SNAP benefits.

In this study, interview respondents consistently noted a lack of information and support from college admissions officers when they asked about requirements, procedures, paperwork, and information on financial aid or scholarships. Several such comments appear in Table 5.

**Table 5. Lack of information and guidance from admissions officers**

<b>No.</b>	<b>Selected Comments</b>
4	<i>They just honestly didn't know what they were doing. They were not familiar with DACA at all. So it was pretty frustrating. So they were asking for so many proofs for them to figure out if I was going to be in-state tuition or not.</i>
5	<i>They honestly didn't help me with guidance about in-state tuition information, state financial aid, or scholarships. They didn't give me the option to apply for scholarships or didn't even tell me about the actual college having a foundation of different scholarships for undocumented students. So I was kind of upset that they didn't tell me that.</i>
6	<i>It was really hard to get guidance. Every single time that I spoke to him (admissions officer) I would get a different direction. Then I felt like sometimes I needed to speak to a different person. They didn't know how to guide me in that direction. They said something contradictory to what the other person had already said. So It was kind of like, I had to piece together these different components to complete the application. It was a lot like figuring it out by myself. It was difficult.</i>

➤ Learning Burdens: Survey Respondents

The survey results also show that many undocumented students report not receiving guidance in high school about college options or information on the availability of ISRT. (See Table 6.) Only 51% of the respondents reported receiving high school counseling about college applications and ISRT benefits. About 40% of those surveyed indicated they were unaware of ISRT policy before applying for college. Fewer than 15% were “extremely” and “very” familiar with ISRT eligibility. Similarly, most respondents (71%) indicated that they were not familiar with any available financial aid, including state financial aid when it was available for this population.

Asked about the difficulty they had understanding admissions requirements and rules, about 16.4% perceived it to be “very” difficult and 39.62% “somewhat” difficult. Such perceptions are consistent with interviewees' experiences, and this may have been accentuated by so many being first-generation students and lacking social and institutional networks.

**Table 6. Learning Burdens (Survey respondents)**

<b>Learning Variables</b>	<b>N</b>	<b>Percentage</b>
<b>Knowledge about ISRT before applying for college</b>		
Extremely familiar	10	10.31
Very familiar	5	5.15
Moderately familiar	20	20.62
Slightly familiar	23	23.71
Not familiar at all	39	40.21
Total	97	100

**Knowledge about financial aid before applying for college**

Extremely familiar	5	5.21
Very familiar	8	8.33
Moderately familiar	16	16.67
Slightly familiar	23	23.96
Not familiar at all	44	45.83
Total	96	100

**Clarity of college/university information about ISRT requirements**

Extremely unclear	36	37.11
Slightly unclear	22	22.68
Neither clear nor unclear	19	19.59
Moderately clear	14	14.43
Extremely clear	6	6.19
Total	97	100

**Understanding Admissions Process and ISRT requirements**

Very difficult	17	17.71
Somewhat difficult	35	36.46
Neither easy nor difficult	23	23.96
Somewhat easy	14	14.58
Very easy	7	7.29
Total	96	100

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**Compliance Burdens**

Majorities of both those interviewed and those surveyed mentioned tangible and intangible compliance burdens.

- **Overlapping administrative requirements at different organizational levels**

Compliance costs may increase when administrative procedures and rules for accessing a policy benefit overlap across organizational levels. For instance, some undocumented students confront various state and institutional requirements in order to qualify for ISRT. Sometimes such requirements can be contradictory. Requirements established in the legislation granting ISRT to undocumented immigrants in Minnesota, Maryland, and Colorado, for example, do not mandate that males register for the Selective Service. At the institutional level, however, colleges and universities require it. A student from Minnesota expressed his frustration over the confusion:

*So one of the requirements was selective service. When I was younger, I tried to join the army, the Air Force, but I was told that because I was an immigrant and illegal, I was restricted... She (admissions officer) said that every man, once they turn 18 they can apply to Selective Service no matter what their immigration status is. I explained and explained to her what I was told by the recruiters who are from the military that I could not, and she said: "Okay, just write us a paper stating what happened, write a paper saying why you weren't able to apply for Selective Service, and I will try to use that to help you get into the program paying ISRT." P#3*

A student in California found herself with different state and institutional forms to complete and no help in doing so. Furthermore, admissions staffers did not respond to her questions or give reasons about the need to filling out forms for different levels of government. This situation increased her compliance costs:

*When I had just started, everybody told me that I had to put I was a DACA recipient. So, I looked, there was a citizen, there was an international student,*



*there was a resident and then there was this thing called AB540. I didn't know what an AB540 was. A B540 in the state of California is for you to receive in-state tuition, along with financial aid if you're applicable for it, but I didn't know that. So I was like, so I think I had to call three different offices and nobody wanted to help me. P#1*

Meanwhile, changing policies in different organizations also affected college applications and eligibility for ISRT:

*It was very difficult because there were a lot of the things that were implemented the year I was supposed to come into college. They (state level) were changing the policies and some institutions hadn't changed their policies. I know, for example, my institution when I was coming in, I didn't have a government identification number, I was in the process of still getting all my paperwork. I already had my Social Security Number because of my DACA status, but I didn't have my government ID. So they refused to help me in the beginning when I had just applied and said I was going to go there. They refused to help me because I didn't have a government ID. P#7*

In states like California and Texas, before undocumented applicants can claim in-state tuition and state financial aid, they must fill out FAFSA (Free Application for Federal Student Aid) forms, even though they cannot benefit from any federal financial assistance so that public colleges can determine financial needs. This requirement is overwhelming for many undocumented students. Applicants must create a federal student identification for both themselves and one parent. A common problem is that in order to create the account, the applicant and parent each need a Social Security Number and an email address. Both are daunting, since most parents have neither. If some parents have SSNs, those could be fake, making the application even more stressful. One also might anticipate that knowing an application shares data with federal officials would be distressing for undocumented immigrants

fearing deportation or legal action: “We don’t qualify for state financial aid or FAFSA, but we still have to fill that out; if you don’t do it, it doesn’t let you complete the application” (#6)

Further, a Minnesota respondent reported that he had to submit all documentation--including proof of residency--to the state higher education department first and then to the college of interest. Such duplication increases compliance costs.

*In order to apply for ISRT, you have to go through the higher education department and demonstrate you live in the state and provide all the proofs to them. Otherwise, if you aren't approved by the higher ed, they don't waive you that you're in state tuition. When I applied for it, I sent them everything that I could. P#3*

Previous studies have shown that when recipients of a public benefit must provide similar documents in different instances, their compliance (and psychological) burdens increase the likelihood of giving up (Herd and Moynihan 2018).

- **Categorization as out-of-state**

When undocumented applicants are accepted to college but classified as out-of-state students despite meeting all ISRT requirements, compliance costs increase. Such students typically come from low-income families; some work multiple jobs and get loans to afford college. If they are admitted to a public higher education institution but classified as out-of-state, tuition costs increase significantly, which may lead them not to enroll or drop out. It should be noted that in those cases where compliance costs increased significantly, psychological costs also matter. Having to demonstrate to admissions and financial aid officers that the out-of-state classification was a mistake could result not only in efforts to gather further documentation but also having to elaborate more explanations. (See Table 7.)

**Table 7. Compliance Costs: Misclassification as Out-of-State**

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No.

**Selected Comments**

2 *I had to apply as an international student. At first, they (admissions officers) label you an international student until you've got that House Bill (HB) 144 approval. Once you send that HB 144 application that you are indeed a Utah resident, then your status gets changed too, but it takes a lot of time. I remember my first year at slick. It was actually kind of scary cause I first got that bill out of state tuition because it (ISRT) hasn't been approved yet (by the university). It was about double the price of what I would have paid in state. I was like: "Oh my gosh, my friends do not go through like what's going on and so they just hadn't gotten it yet." Then I got the new bill which was the in-state tuition, and it was much better, but it took a lot of time, about one term.*

3 *So, in the beginning, when I went to enroll in college, I thought it was pretty easy. And I thought it was going to be easy like every other student. So I went there, they (admissions staff) scheduled the time for all applicants to be there. I went there. I put my glasses on, I saw myself and when I noticed the pricing, they were charging a different price than other students. And when I applied for ISRT, I realized that it (application process) was much different because I was undocumented, and they charged me out of state. Because of that, I looked at the Minnesota higher Ed, I saw all the list of requirements, and a few of them made me think maybe I cannot apply quite because of who I am. So I almost gave up. I could not apply for school. I talked to a counselor. I also talked to the people who work for the financial area of the school, but they did not help me.*

11 *After I filled out the forms, then two weeks later, they're like: " Oh you're not a citizen, we can't do that (charging ISRT) anymore, and so that to me was very heartbreaking because I went from not having to worry about tuition to all of a sudden, I needed more money for tuition, you know.*

12 *I remember they tried charging me out-of-state tuition at a community college in Colorado<sup>24</sup>. I was trying to explain to them the mistake because someone who is DACA should be in-state or in-district. I went over a few weeks, I was just kind of going back and forth, and they were trying to, you know, like, charge me like a lot for it. And eventually, like, I guess, they educated themselves.*

- **Additional documentation not required by ISRT policy**

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<sup>24</sup> Community college name omitted to avoid participant identification.

Administrative burdens scholarship has continually pointed out how increased documentation and paperwork requirements result in more compliance and psychological burdens for participants, possibly discouraging participants and negatively affecting policy outcomes (Herd and Moynihan 2018; Moynihan et al. 2015). One of the central questions that scholars and practitioners have investigated are criteria for defining "reasonable" requirements that do not delegitimize individuals or deviate from the policy goal when a person claims public benefits (Doughty and Baehler 2020). During the interviews, undocumented participants routinely complained about having to provide documentation that was not required by existing ISRT policy. As the comments in Table 8 illustrate, for some, those required documents made the experience genuinely daunting.

**Table 8.**

**Requirements for Additional Documentation: Selected Comments**

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1 *I did not take my Social Security number with me [temporary DACA SSN], but you need an actual identification document (ID) with your picture on it. So, I took my high school ID and they didn't want to help me because they said: "it wasn't an official ID." My mom came with me, and she said loudly: "Como asi que no te van ayudar?" (Why won't they help you?)" and I said: "I don't know, they don't wanna help me", I am Maria<sup>25</sup>, I am providing everything you need for me to tell you I'm Maria, I have lived, studied and graduated in a California high school. I just don't have an "official" ID on me. We were very feisty. We were making this scene in the room, and then somebody from one of the offices came and listened to us. She helped me. I gotta help, I needed it, and so it worked out for me. Just with my school ID.*

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<sup>25</sup> Name changed to protect participant identity.

4 *The license [driver] is a proof of residence, but they (admissions offers) were asking for more. They were asking for tax forms, they were asking for utility bills, extra paperwork that I feel like was not necessary to prove that I was, that I had been here for a while. They had my transcript from high school, they had my high school diploma. So that was not enough. That extra paperwork definitely wasn't necessary.*

5 *They asked for proof of health insurance coverage. I just had to explain that there was no way I could get health insurance. They do not admit you if you do not have health insurance. I explained to them, it's just not everybody is going to have health coverage.*

12 *I remember it was just for the in-state tuition and all of that. I had to take taxes, and it wasn't just taxes (forms), that was like bills, trying to prove that I was living where I was, and that I had been there. So I think I had to go and show them like bills of my cell phone. I remember it was like a stack of paperwork and there was a bunch of it. It was like kind of like legal documents and stuff. I just remember the taxes and a lot of bills. I also brought them all my transcripts from the high school.*

14 *I remember they also asked for proof of residence. I told them: "I have been here since fifth grade", but apparently, my high school diploma was not enough. So, I brought those two utility bills and my bank statement (Deep breath). They also asked me for my driver's license, I don't know why. I guess that it demonstrated that I was residing here according to them. That is odd, there are folks out-state tuition 'cause' they do not have a driver's license.*

Some undocumented students also complained about how compliance burdens increased when they were asked for proof of parental or other relatives' income. Previous studies have found that participation in public benefits drops when additional reporting of income or taxes is requested (Brien and Swann 1999; Herd and Moynihan 2018). According to one participant, for example:

*The most difficult part was just filling out that economic stuff where they ask you for each family member, how much money that family member makes. I've never really had that conversation with my parents, 'cause I only have my dad who works. My mom is kind of stay at home and so. We never really had that yearly salary. That question how much do you make in a conversation was hard. We really had to go into the records of getting his (father) pay stubs to be able to figure out that exact number*

*that we needed. So I think that was the most challenging part, it was trying to identify information that I've never had to use before. At public school you don't ever have to use that. For them (parents) to require all these different forms was a little bit harder to track down, especially just 'cause like I'm the first in my family to go to college and my parents weren't really prepared to do so (P #2). 26*

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- **Back and Forth**

Scholarship in behavioral economics and social psychology suggests how compliance burdens increase when individuals move "back and forth" when completing paperwork and gathering documentation to access public benefits (Craig 1999; Riphahn 2001). Public administration scholars also point out that one of the tactics of street-level bureaucrats to discourage potential beneficiaries is to use the qualification process to "wear down" claimants (Herd and Moynihan 2018). In interviews with undocumented applicants, close to 90% of respondents expressed feeling exhausted and frustrated when completing admissions paperwork to benefit from ISRT. As one reported,

It was like a lot of back and forth, and then once I get to the school, they were like: "Oh, we need this other document too." I drop off those documents; and I

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26 Another respondent recalled: Because I got married recently to my husband... Well, because of that, actually, that made it more complicated because my husband is Mexican. Because he is Mexican, he is an immigrant, he does not have DACA, or anything. And when I applied for ISRT, they told me "Well, if you have a husband, show me his taxes", but he was in Dallas, Texas. And I explained it to them, also that he doesn't have anything to prove, for the taxes in the last two years. And they said, but you have to show us his taxes for the last two years since you're married to him. And I asked, how am I going to do that? Because he doesn't have any ITIN number or he does not have any SSN. He told me "But he is married to you, you have to figure out how to do it, go talk to the tax person, and they will help you" So I had to figure out how to fix his (husband) papers and then try to do the taxes from the last years. And then, after that, I could move on to my own stuff (P#3).

still needed another document, so it was pretty, pretty long. The whole process was like two months or so. (P#4)

For another,

At the university, I felt like they didn't really try and reach out to help me. Like it was, it was very hard. They made it very, very hard for me, just because they kept asking me for more and more and more documents, and then I would give them those documents and they would ask me for more and more and more documents. And then it was just like a back and forth back and forth, back and forth, you know, in it. It was starting to become very, very, very stressful and, and just like heartbreak. (P#13)

- **High Opportunity Costs**

Undocumented students are more affected than others are by opportunity costs, often reflecting their scarcity of financial and other resources. An opportunity cost is the value given up for making one decision instead of another (Earl 1988). Although one might expect that individuals make the "most advantageous" decision for themselves, when facing a shortage of resources individuals may make less advantageous decisions. The literature evaluating this so-called "vulnerability bias" argues that those in situations of extreme deprivation tend to privilege resolution of daily emergencies over investing resources in medium- or long-term actions (Bhargava and Manoli 2015).

Scarcity of resources can bias an individual's decisions and influence whether they claim public benefits. Each action can involve significant cognitive demand when considering how a particular decision may affect budgets (Bertrand, Mullainathan, and Shafir 2004). Most undocumented students make decisions balancing spending time, money, and effort applying to college or looking for a job or working. Applying for college may result in more costs than benefits, at least in the short term, but getting a job may result in fewer costs and more benefits

in the short term, allowing them to "survive." Applying for college and meeting requirements for ISRT eligibility involves higher opportunity costs that could influence their desire to participate and discourage them from applying.

Moreover, without certain legal documents, some undocumented youth, such as those who are not DACA recipients, cannot obtain drivers licenses. Not having a driver's license severely restricts their mobility, increases daily costs, and restricts their ability to seek public benefits. For instance, an undocumented immigrant—who meets all the ISRT policy requirements in Virginia—but lacks a driver's license, had to prioritize taking Uber to get to her job as a babysitter instead of going to a college admissions office to obtain information and complete an application.

*So for me, I think the biggest thing that has been frustrating is not being able to drive or have my driver's license. Not being able to drive has been hard because for people, you know, that I watched their kids, they would want me to come to their house and so, I would have to get a ride or Uber, and I have spent so much money on Uber. Um so, I cannot save money for going to college and figure out the programs I want. P#8.*

Another participant noted that she had to sacrifice wage-hours worked while completing requirements.

And then I had to call off work one day, and yeah, I had to call off work one day.... Use the day... I don't know whatever excuse I gave them and I went to the IRS.

P#1, undocumented student in California

### ➤ Compliance Burdens: Survey Respondents

The survey asked respondents to assess the difficulty of meeting admissions requirements. Table 9 presents their views of tangible and intangible compliance costs. Similar



to the interviewees' responses, about 62% perceived meeting the requirements to be “very” or “somewhat” difficult. Since common requirements for qualifying for ISRT include having studied and graduated from a state high school and (in some states) signing affidavits, most respondents evaluate the process as being demanding could suggest that higher education institutions ask for documentation and have requirements that may have little to do with the benefit of ISRT as some interviewees pointed it out.

In terms of intangible costs, for instance the time needed to complete the application process, about 38% of those surveyed reported taking between 4 and 8 weeks to complete the requirements, and about 40% more than 4 weeks. Both figures are relatively close to the 70% of interviewees who estimated that it took between two and three months to complete the process. The latter also emphasized that their counterparts did not take so long.<sup>27</sup>

Close to half of the survey respondents reported visiting college admissions offices between one and three times to complete the application process. This result is also consistent with the experiences the undocumented participants described in interviews when they referred to going “back and forth” to with documents needed for ISRT eligibility. Although there are few comparable results for other populations, for undocumented students, who come from low-income families, traveling to an admissions office or sacrificing work hours may be quite costly in terms of both financial and opportunity costs.

**Table 9. Compliance Burdens**

<b>Compliance Variables</b>	<b>N</b>	<b>Percent</b>
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<sup>27</sup> In general, it takes a citizen or legal resident an average of two to four weeks to complete admissions requirements (Goodman et al. 2015).

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<b>Difficulty Meeting Admission Requirements</b>		
Very difficult	14	14.58
Somewhat difficult	42	43.75
Neither difficult nor easy	15	15.63
Somewhat easy	17	17.71
Very easy	8	8.33
Total	96	100
<b>Time to complete admissions and ISRT requirements</b>		
Less than a week	17	22.37
Between 1 and 4 weeks	29	38.16
Between 4 and 8 weeks	18	23.68
More than 8 weeks	12	15.79
Total	76	100
<b>Numbers of times on average went to admissions office to drop off a document</b>		
Never, I completed everything online	35	45.45
Between 1 and 3 times	35	45.45
More than 3 times	7	9.09
Total	77	100

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### **Psychological Burdens**

Numerous participants mentioned psychological burdens in both interview and survey responses. Next the most mentioned.

- **Perception of an unfair admissions process**

Social psychologists note s that individuals have a basic human need to be treated fairly and respectfully for their well-being and self-esteem (Lind and Tyler 1988). When participating in public benefits, being treated with respect and fairness legitimizes the process and the policy outcomes—regardless of whether one benefits—and encourages individuals to continue interacting with the administrative state (Stone 2012). Policy feedback theory suggests that individuals value and find legitimate government procedures they perceive as fair and respectful, but reject procedures and outcomes they consider to be unfair, excluding and belittling (Bruch, Marx-Freere, and Soss 2010, cited by Moynihan, Herd, and Harvey 2015).

Most of the undocumented students interviewed (17) found the admissions process and claiming ISRT to often be unfair and demeaning. (See illustrative comments in Table 10) In their view, they must follow the rules, meet requirements, and experience deeper scrutiny to benefit from ISRT than their citizen and legal resident counterparts. Indeed, some participants complained about navigating an admissions process created for citizens and legal residents and not for them. When individuals believe that they have received unfair treatment, the level of psychological burden may intensify because it makes them feel “undeserving” and not “belonging.” Such perceptions may result in later reluctance to interact with the administrative state or engage in civic participation (Mettler 2002).

**Table 10. Perceptions of Admissions Processes as Unfair**

2 *Well, I think it was like going in blind, having a completely different experience than most of my Caucasian friends because they didn't have to go through providing proof that they were actually Utah citizens or residents. When you are undocumented, you have that feeling you have to prove you also deserve it. I've lived here since I was two years old, and I went from preschool through the senior year here, and I still have to show them that I was a Utah... You need several documents that a regular US citizen wouldn't need to provide.*

5 *It was kind of tough. I was just a little embarrassed about saying, I don't know how to answer these questions. I just felt I was separated from other people because all my other friends were able to fill it out quick and easy. But I had to go through this tough process for just being undocumented. It was asking me if I had any proof of residency, or if I came with the visa, if I had a green card. It was just asking me all these other questions that nobody else also experiences.*

7 *I was very good friends with one guy (a U.S. citizen) and we were both applying at the same time and I told him like: "Hey, why are they making us sign so many papers?" And then, he told me that he did not have to sign any of the papers that I had to fill out, so the affidavit, residency forms, all that stuff.*

12 *We cannot have driver's licenses. We just have "Driving privilege cards," it is how they're called, and we only get it for a year. With DACA, when it was a two-year program like the part-time resident kind of thing, we got it for two years instead of the one year, it is the same for college. So we would get it for two years. We cannot get it for five years, which ordinary citizens get it. It's like we are kind of in the middle. So that's a good example of being part time or part residents. I mean, I think that just like the name also is a little wacky, the privileged card.*

- **Fear of putting parents at risk**

Studies of economic behavior show that individuals frequently do not make decisions based on self-interest but on the welfare of others. (Andreoni and Miller 2002). In the case of undocumented students, their decisions about going to college nearly always are influenced by considering the risk to their parents' well-being. Although some undocumented youth may be protected by temporary legal residence under DACA, their undocumented parents are not. When

submitting information to admissions officers or uploading it to a database, most fear legal actions against their relatives. One might expect that in this case, the psychological burden is carried by both undocumented youth and their parents. (See illustrative comments in Table 11)

**Table 11.**

**Risks of College Application to Parents**

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2	<i>Providing my parents' information was always the difficult part for us, because since they're undocumented, they're working on their fake Social Security numbers and so it's always that worry of those questions. I wondered if it was worth it to even try to continue higher education if it' was possibly going to put me at my family at risk.</i>
7	<i>Well, there was definitely fear, but the fear was not for me because I knew I was protected because of DACA. The fear was for my parents, for my family, because they were not protected. So, you know, giving away all my freaking information to random strangers to an institution, I have no clue what they would do with that, you know. Yeah, they were going to use my information to just keep it in for me to enroll, but I just I do not know what they could have used it.</i>
5	<i>That actually worries me in that risk or when we're going out of town for something (paperwork). For example, because I have to go back to get my photo taken and to get my thumbprint. So every time we travel and I see a state trooper or a cop, I just get really nervous because I just don't want them to stop my parents and have my dad's in a bad situation because of me or my college paperwork. So that's the point that always puts my parents at risk. He (father) can't renew his license because he would have to get the passport renewed for, and when we have to fill out college forms or do errands, it is a huge risk.</i>

In this context, Beattie et al. (1994) found that individuals are more likely to not make decisions when their decisions might significantly affect loved ones or when there is a high chance of a negative outcome. This in turn leads one to expect that some undocumented youth are deterred from applying at all because such action could put their parents at risk.

- **Complex interactions with admissions officers**

Much scholarship on administrative burdens has explored how interactions with street-level bureaucrats influence individuals' behavior, reactions, and decisions when they claim public benefits (e.g., Barnes and Henly 2018; Hattke, Hensel and Kalucza 2020; Herd and Moynihan 2018). As Chapter Five discusses, admissions officers are SLBs as they interact directly with undocumented immigrants who apply to college and claim ISRT. They are the first face of ISRT when undocumented applicants apply for college. Admissions officers are the main source of information; they review and validate documents that entitle undocumented immigrants to ISRT, and they constantly interact with such applicants. Admissions officers are institutional agents with considerable administrative power to shape admission requirements and to decide on admission and ISRT eligibility for undocumented applicants (Nienhusser 2018).

Empirical studies show that SLBs' values and beliefs drive their work and decisions when shaping administrative rules and allocating public benefits (Bell et al. 2020). Some SLBs -- influenced by perceptions of certain individuals' deservingness of public benefits--may be more or less reluctant to ease administrative rules so that such individuals benefit. For instance, some SLBs could omit eligibility information or provide it inaccurately to potential recipients. They also could increase requirements such as documentation and paperwork for target groups; some may be reluctant to clearly explain procedures, answer calls or other communications from potential beneficiaries, or display helpful attitudes. In short, some SLBs may use their administrative discretion to make access to public benefits more onerous for some target groups.

Although this manuscript does not examine factors that influence SLBs' attitudes and decisions (but they are discussed in Chapter Five), it is important to note that their values and beliefs may shape how they interact and make decisions affecting different population groups.

At the same time, the work of SLBs work may be affected by contextual factors that restrain their ability to exercise discretion. SLBs working in the same policy area may act differently for numerous reasons, including varying levels of knowledge about policy requirements and organizational rules or differing organizational protocols. Finally, individual traits of SLBs may dispose them to act in more or less rule-oriented ways (Brehm and Hamilton 1996; Tummers and Bekkers 2014).

In what follows, discussion examines several notable patterns in interviewees' reports of their interactions with admissions officers when applying for college and claiming public benefits.

⇒ *Long waiting period*

Waiting is one way of experiencing the effects of power (Auyero 2012). Reid (2013, p.754) notes that “waiting is a socially constructed medium through which power relations are made.” Some scholars argue that making people wait and delaying procedures and responses are common practices in public service, particularly with powerless groups (Auyero 2012; Schwartz 1974; Soss 1999; Wacquant 2009).

Most of the undocumented students interviewed complained about waiting many hours at admissions offices and having phone calls go unanswered. Some scholars assert that such experiences systematically communicate that an individual's time is of little value and must be endured to receive the benefit (Goodsell 1977; Mettler 2002; Mettler and Soss 2004; Soss 1999). Long waiting times also reinforce a lack of power and standing and make people tired and frustrated (Piven and Cloward 1971).

Meeting admissions requirements while interacting with admissions officers "teach" undocumented applicants that they will have to comply by persisting and waiting if they want to attend college and benefit from ISRT. Auyero (2012) suggests that while waiting, powerless groups learn to be "patients" of the state. Similarly, Soss (1999) claims that some bureaucratic procedures and interactions with SLBs "train" people to subordinate themselves to the authorities. In this sense, undocumented students absorb the message that they should be patient and keep waiting because nothing else can be done, drawing attention to a significant dynamic that has received relatively little scholarly attention in public administration. A participant noted:

*Then, when I did it (submit all the required documentation), I had to wait. I had to wait a few weeks. I called them and they said "Oh, yeah, we have it" (his package). And then, I had to wait again. Then, they said: "We haven't opened up files because there's so many students." P#3*

Long waiting times also include mistakes such as delays produced caused by system crashes and errors in interpreting policy. As one interviewee observed:

*The (admissions officer) told me: "You can either email it (documentation) but they will have a lot of emails so they don't even pay attention." She told me that they don't have time to check all of them, so it is better you can send a hard copy. So it's because it goes into a pile or you can also fax it that goes into the fax machine, which is also file. I did both just in case they lost my documents again. P#4*

Furthermore, unlike the possible reactions of more powerful groups to similar situations of lengthy waiting and mistreatment, undocumented students try to show absolute compliance and submission. They must submit and wait instead of complaining about admissions officers' authority and requirements. Undocumented students evidently learn that, despite delays, arbitrary



changes, and meaningless paperwork, they must comply without complaining. Some participants observed:

*It depends on who you talk too. So there was this, one guy, he was always rude. He's like "oh, you're back, you shouldn't even be here, you do know it, right? You're taking someone's spot" Yeah, and I didn't tell that to anyone 'cause I didn't know who to complain to. I was like I'm already in, it's like I'm very lucky to be here. I'm not going to be complain. P#1*

*It was a very hectic time. You know, applying for college and resident rates, not just because I didn't know what to do or what I was doing, but because there was a lot of back and forth. I remembered that I went one day, and then, they asked me to bring other things, other documents. So I had to go back home, look for documents, go back and it was repeated like three times in one day, and you know, I lived like 15 minutes away, so it wasn't too bad, but you know, it was a lot of back and forth a lot of miscommunication, a lot of hectic going on at that time, and it was a lot of fear. P#7*

Submission to the will of admissions officers limits the autonomy of undocumented students. Autonomy is an individual need that shapes individual decisions and identity (Deci and Ryan 1985). When complying with administrative rules and requirements that are unconnected to individual preferences and decision-making power, psychological burdens may be exacerbated through a loss of autonomy. Undocumented students may experience such loss of autonomy. They do not believe they have a "choice." They persist if they want to go to college and benefit from in-state tuition. To whom could they complain if an admissions officer mistreats them or if required documentation is beyond their means? They do not have power at all. One participant observed:

I just did what they told me to do. And I just did not know what the hell I was signing at the time. I was just like: "OK, you are telling me to sign this and this," I'll sign it whatever, I was kind of just going with the flow, honestly. I

had no clue what I was doing. So you know, I guess my defense mechanism was to sign everything. I was losing myself. P#7

Moreover, respondents conveyed a generalized feeling of not knowing what to expect about the admissions process while waiting. Overall, undocumented students reported not knowing the “right” documentation and paperwork they needed to apply for college and claim ISRT. They simply waited and returned to college offices as many times as necessary to complete the process. They also reported having little certainty about the final decision. They saw the process as full of obstacles and complained that the admissions process was too bureaucratic.

*He (admissions officer) told me: “Call me back, I will try to figure out some way to help you. I understand that I was able to help your sister when she was younger, but every rule has changed, and it is more restrictive for someone like you.” He was referring to me to actually get into college and get the in-state tuition. It was a shit, there was like a lot of red tape. P#3.*

### ⇒ **Feelings of fear and frustration**

Most of the participants saw the college admissions process as steeped in uncertainty, fear, and frustration. Indeed, the emotional stress and fear that some individuals experience when claiming public benefits is one of the most difficult aspects to measure, and public administration has mostly neglected it. Why do undocumented students endure an admissions process full of fear, frustration and uncertainty? In part, it is because they are powerless and in a disadvantaged position in many ways. They have no other option if they want to achieve a certain social mobility. Their lives have been built amid constant uncertainty and fear. When they are applying to college, they must come out of the shadows. It may be the first time they disclose their

undocumented status openly. They likely attended K-12 schools without much difficulty, since they could do so without documentation or immigration status being scrutinized. But the transition to postsecondary education is different. For most, it evidently seems like groping down a road without knowing what will happen. They may have already risked their lives. So it may well appear as if there is little to lose if life is about accessing postsecondary education and achieving social mobility in the future.

Once they begin to navigate the admissions process, the uncertainty and insecurity only increase. It is uncertain how much time it will take to apply for admission and to learn about decisions. About 80% of the interviewees reported not knowing how long the process would take, if they would be accepted, or if they would be eligible for in-state tuition. Not knowing what to expect exacerbates frustration and fear. As Herd, Moynihan and Harvey (2015, p. 50) note: " In situations where the individual depends upon the state for vital resources — for example, the provision of health services, income, immigration status — uncertainty about the receipt of those benefits, as well as frustrations in the process of seeking may elevate stresses among individuals." Some participants recounted:

I did not enroll at any other institution. I was too scared of getting denied because of my legal residency. So, I figured a kind of set my own boundary on there. Of course, people around me and the government told me what I could or couldn't do, but because of that (uncertainty), I didn't want to go further. (P#14).

Whenever I see any of those questions such as SSN, residency status, and so on, I just I don't finish the form, I just don't fill it out because of I feel I don't have it. I can't pretend to have it, so I just don't want to go through the process of being frustrated [when] I've been rejected for something else, for another thing. (P#8).

### ⇒ **Feelings of being treated as undeserving given their unlawful status**

In the United States, being undocumented sometimes is associated with being a criminal and perhaps more frequently a freeloader on public benefits. Undocumented immigrants are constructed as illegitimate, immoral, invisible, and guilty (Ackerman 2014; Chavez 2013). Such social construction of illegality matters when implementation of ISRT for undocumented youth. It could make political actors, including street-level bureaucrats, impose more requirements, exercise deeper scrutiny, and treat undocumented youth in degrading ways.

Some scholars suggest that the administrative state has systematically fostered a social construction of undeservingness for certain target groups (De Genova 2002). For instance, Coutin (1993) argues that U.S. law and policies perversely label individuals as citizens, legal aliens, and asylees. Those categories distinguish "pure" natives from foreigners and distinguish citizens from non-citizens. At national and state levels, governments reinforce these distinctions among different membership categories through language. Furthermore, these distinctions are made between "deserving" (e.g., citizens) and "undeserving" (e.g., undocumented immigrants) groups. As Table 12 show, several respondents reported experiencing these apparent classifications.

**Table 12. Reports of Experiences of Being Treated as Undeserving**

- 
- 
- 4 *I interacted with an admissions officer; I felt like since she knew that I was an immigrant and undocumented, I feel in a way, she made it harder for me by asking all of that stuff that I felt it was unnecessary. Her attitude was pretty demeaning. So, what actually I ended up doing was that instead of going to that campus, I went to a different campus and they treated me better.*

5 *I had a feeling that they're gonna charge me or give me a few ugly looks because we don't know how people are going to react when you say that (you are undocumented). I haven't had anybody that would be rude. To me, but again, like I've heard different stories that these don't go here because these people are rude and they're gonna judge you. Don't go here because they're going to be real mean to you. You can go here because they're really nice and they treat everybody equally. Yeah, so there everybody. There's some places (colleges) that are known to be pretty ugly for that for being really judgmental.*

13 *I noticed she did not treat badly someone that was in front of me. Whereas when she was seeing me and my mom, you know, because I would also translate for my mom to whatever she was telling me that I needed, I would notice her attitude, demeaning (long breath) and she just asked for documents that were unnecessary.*

These experiences affect undocumented youth who feel frustrated and unequally treated and shape their future interactions with the state. Undocumented students also often communicate these experiences to others who begin to select colleges based on reputations for better treatment. This undoubtedly reinforces a system of exclusion and marginalization. Further, public administration scholars maintain that previous experiences with the state build citizenship and civic engagement (Mettler and Soss, 2004), shape individual participation (Campbell, 2012), and transmit messages about the role each person has in society and the way governments work (Wichowsky and Moynihan, 2008; Bruch et al., 2010). Interactions and experiences with bureaucracy may result in feedback mechanisms through direct interactions or anecdotes shared in social networks (Aizer 2007; Moynihan and Soss 2014).

Undocumented immigrants are also associated with criminality (Chavez 2013; Flores 2017; Warner 2005). Former President Donald Trump repeatedly referred to undocumented Mexican immigrants with comments such as “They are bringing drugs, they are bringing crime, they are rapists” (Trump 2015). Although immigrants are among those convicted of the fewest crimes (Martinez 2008), such a negative narrative still may influence some members of the

public and shape attitudes of SLBs (Bell et al. 2020; Schemer 2012; Moynihan et al. 2020). U.S. citizens, for example, distinguish immigrants based on legality, and most of them strongly dismiss the “illegals” (Flores and Schachter 2018). A participant noted:

I definitely believe that there's biases, and a lot of times it's not that the person is racist. I think that it's just biases that we learn because society teaches us do things just like in terms of you see it in movies. You see movies where every time you see a Latino, the Latino is always a gang member, you know... and so we have these perceptions in the back of our head. We see a Hispanic name and we automatically make assumptions just because this is what we know. This is what society teaches us, and so. I definitely think that there's biases in admissions officers. P#2

Individuals perceived as being in the country illegally may experience more burdens when they try to access public benefits. Based on stereotypes, some scholars argue that immigrants may engage in protective behaviors to avoid being categorized as “illegals” (Flores and Schachter 2018). They may try to camouflage accents and show themselves to be "Americanized." This behavior produces frustration and a detachment from their true origins. Wanting to appear "other" and not wanting to reveal "who you are" when interacting with the administrative state and claiming public benefits increases psychological burdens. A participant noted:

I definitely could tell the racism there with my accent. Now my accent isn't so bad. I've worked a lot on it. I worked on this so hard. I used to have a very strong accent. It used to be very hard with the “R.” I had to every single time I spoke I had to think about what I was saying. Even now I remember they asked my name and I said quickly because you know that's how we speak in Spanish is very fast, and then he made fun of me for not being able to speak very clearly, slow and all that stuff. P#14

Undocumented immigrants also may be concerned about being identified as some form of "alien." Others, as in the case of DACA recipients who have "partial resident status," are in

limbo when they fill out admissions forms that allow selection among "legal resident," "citizen," but not "partial resident."

*...Answering other questions like, if I was an alien, or if I had, or I came with a visa or nothing, but that I was considered an alien. DACA is my "alien card." It's just unbelievable how people can say that we are aliens. P#5*

Another common but inaccurate narrative that echoes public opinion is that undocumented immigrants abuse welfare programs and take away benefits from citizens (Brown 2013). Some opponents of inclusion policies towards immigrants argue that public benefits are magnets for immigrants who therefore should be prohibited from receiving public benefits (Borjas 1999). Yet, undocumented immigrants are ineligible for government benefits and cannot benefit from them (Drachman 2006; Haider et al. 2004). As a participant noted:

I feel that that they're not in favor of immigrants getting an education here. Yeah. Yeah. In Virginia. Yeah. It feels like we were a burden to them in a way. Like, they think that, you know, we take away from, from their benefits, which is not we, which we don't get benefits at all. That's how it feels like, that's how I read on Facebook post. You know, that's how comments, a lot of comments, they say like, oh, like: "Why are they coming here to study and taking away our kids' financial aid, benefiting from the college system, and they're not even from here." P#4

Survey respondents also identified psychological burdens, complementing the interview findings.

#### Psychological Burdens: Survey Respondents

Tables 13 and 14 present the survey results associated with psychological burdens. Table 13 focuses on interactions with admissions officers, while Table 14 shows levels of concern respondents reported about each requirement for applying to college and qualifying for ISRT. Undocumented students indicated they preferred to interact with admissions officials either in

person (26.04%) or by phone (26.04%). However, a considerable percentage (39.58%) indicated “other method,” which one could be a “third party,” as interviewees mentioned.

Given the frequent ambiguity and lack of clarity of requirements to complete the admissions process and benefit from ISRT at the institutional level, one might assume that undocumented students must interact more frequently with college admissions officers to address questions. As previous chapters indicated, the admissions process for undocumented applicants is not the same as that citizens and legal residents complete; rather it requires extra documentation and paperwork, which could result in frequent interaction with admissions officers. In-person interaction also is consistent with the greater need to "show up" to navigate the admissions process. Yet, some studies also have found that undocumented immigrants prefer face-to-face interaction to protect their privacy (Gleeson and Gonzales 2012). Preferences for face-to-face interaction could be due as well to cultural factors. Studies in social psychology have shown that Hispanic culture is deeply rooted in a more collectivistic approach that values personal interactions (Ortiz 2020).

Unlike interviewees, some survey respondents (about 30%) found interaction with admissions officers to be stressful and moderately stressful, and about 28% felt dissatisfied with the guidance they received about the steps they needed to take to qualify for ISRT. However, still almost 46% of respondents reported they were somewhat satisfied or completely satisfied with the guidance they received. This large difference in perception between interviews and respondents may be due to the fact that individual experiences--whether positive or negative—are highly subjective and depend on individual characteristics (of both applicants and SLBs) as well as on cultural, social, and organizational factors. For instance, an undocumented applicant may feel dissatisfied with the guidance given by an admission officer or affected by the



treatment received. This may be the result, however, of an admissions officer’s lack of awareness of and training about the policies affecting undocumented immigrants, rather than an intentional behavior to prevent the applicant from qualifying for ISRT. Similarly, staffers’ "slowness" or “negligence” may reflect their lack of control over workloads and insufficient resources (Barnes and Henly 2018; Lipsky 1980). Although some interview and survey respondents may implicitly blame college personnel involved in policy implementation rather than a particular admissions officer, the officer is the face of the “institution.” As street-level bureaucracy scholarship points out, for clients SLBs will always be the culprits in any denial of public benefits (Keiser 2010; Barnes and Henly 2018).

**Table 13. Psychological Burdens: Interactions with Admissions Officers**

<b>Psychological variable</b>	<b>N</b>	<b>Percent</b>
<b>Preferred method of interaction with admissions officers</b>		
Face-to-face	25	26.04
By email	12	12.5
By phone	19	19.79
By online chat	1	1.04
Other methods	38	39.58
I did not interact with any college staff	1	11.43
Total	96	100
<b>Perception of the Interaction with Admissions Officers</b>		
Very stressful	11	13.1
Moderately stressful	15	17.86
Neutral	20	23.81

Slightly stressful	25	29.76
Not stressful at all	13	15.48
Total	84	100

**Satisfaction with guidance by admissions officers**

Completely dissatisfied	10	11.9
Somewhat dissatisfied	15	17.86
Neither satisfied nor dissatisfied	21	25
Somewhat satisfied	22	26.19
Completely satisfied	16	19.05
Total	84	100

**Perception of the language used by admissions officers**

Inappropriate	1	1.19
Slightly inappropriate	10	11.9
Neutral	27	32.14
Slightly appropriate	13	15.48
Appropriate	33	39.29
Total	84	100

Other psychological costs may flow from specific admissions requirements. Table 14 shows reported levels of concern undocumented youth expressed. Among the documents about which respondents were “very concerned” were those related to citizenship (40.91%), information about parents (33.83%), proof of residency (27.82%), Social Security number (26.47%), and affidavit (21.8%). Concern about exposing information about their parents and

putting them at risk appeared to be less than what interviewees commented on. Yet, some of the open-ended responses on the survey, communicated similar worries.

One of my concerns was not being accepted for being undocumented and having to share my personal information about my parents and myself.

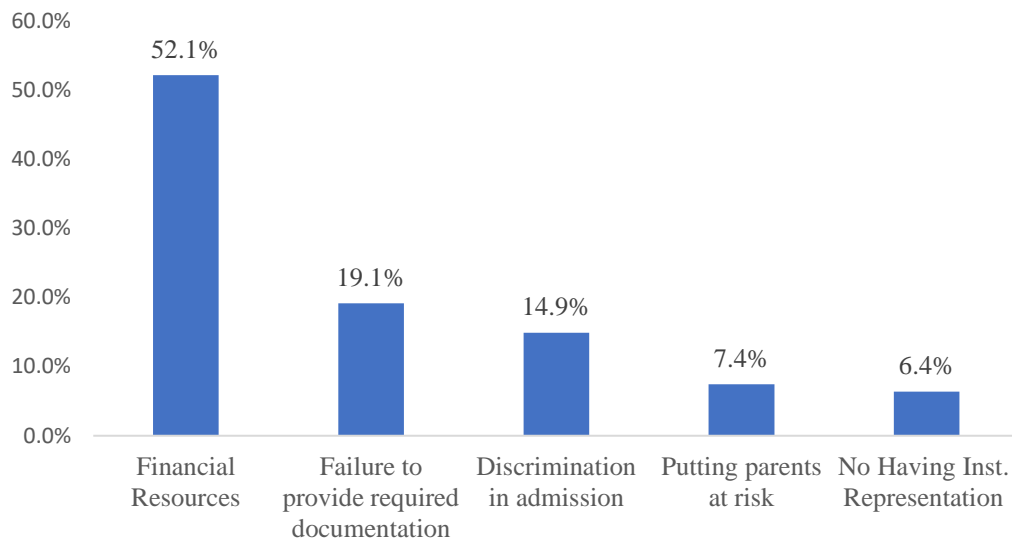
*Survey respondent #96*

**Table 14. Levels of Concern about Admissions Requirements**

Likert scale	SSN		Citizenship		Proof Residency		Affidavit		Taxes Forms		Driver License		Health Records		Parents Inf.		In person Int.	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Very concerned	35	28.69	54	44.26	23	19.01	18	14.75	18	14.88	20	16.53	9	7.38	34	27.87	14	11.48
Concerned	19	15.57	27	22.13	25	20.66	18	14.75	20	16.53	17	14.05	16	13.11	24	19.6	19	15.57
Somewhat concerned	14	11.48	14	11.48	18	14.88	22	18.03	34	28.1	15	12.4	12	9.84	16	13.11	16	13.11
Slightly concerned	23	18.85	15	12.3	15	12.4	9	7.38	13	10.74	13	10.74	20	16.39	15	12.3	20	16.39
Not all concerned	29	23.77	12	9.84	39	32.23	25	20.49	28	23.14	51	42.15	60	49.18	31	25.41	43	35.25
Not applicable (N/A)	2	1.64			1	0.83	30	24.59	8	6.61	5	4.13	5	4.1	2	1.64	10	8.2
Total	122	100	122	100	121	100	122	100	121	100	121	100	122	100	122	100	122	100

When open-ended questions asked about respondents' primary concern when applying to college, their answers can be placed in five broad categories: financial resources, failure to provide required documentation, being discriminated against in admission, putting their parents at risk, and not having college personnel dedicated to serve them. Figure 1 shows that the major concern of undocumented participants when applying for college was financial resources (52.1%). This is consistent with other studies that conclude that financial barriers are the main reason why undocumented youth do not attend college (Abrego 2006; Abrego and Gonzales 2010; Amuedo-Dorantes and Sparber 2014). Not surprisingly and consistent with the interview comments, failure to provide the documentation required in the admissions process also was among the concerns. Then, gathering documentation suggest both compliance costs and psychological costs, implying that administrative burdens cannot be understand separately, but instead an individual experience of policy implementation that involve multiple costs. Such burdens can hamper eligible individuals from accessing public benefits much as administrative burdens scholarship contends (Herd and Moynihan 2018).

**Figure 1. Major Concerns When Applying for College and Claiming ISRT: Survey Respondents**



Both interview and survey respondents reported the learning, compliance, and psychological burdens that as undocumented applicants they faced when applying to college and seeking to qualify for ISRT. Clearly, undocumented immigrants seeking access to higher education experience clearly experience magnified learning, compliance, and psychological burdens. In terms of learning burdens, the biggest complaints were around the lack of information and guidance from admissions officers. Scholars assert that the "consequential decision of claiming a benefit is highly sensitive to the manner, and frequency, with which public benefits information is presented" (Bhargava and Manoli 2015, 3493).

Since higher education institutions have control over the information they provide to applicants, the content and tone used influence their reactions and decisions (Cochrane 2010). In the case of public benefits such as ISRT and financial aid options in higher education, employing inclusive language, explaining why extra documentation may be needed, clarifying

ways to address problems, and avoiding confusing information could help motivate more students to complete the admissions and financial aid procedures (Cochrane 2010).

Compliance costs increase for undocumented students given the higher level of documentation and paperwork they must provide and follow. In some cases, other institutions at the national level mediate such requirements. Proof of residency and documentation of income and taxes is one of the most onerous requirements for this population. In order to reduce compliance costs, some scholars have called for simplifying processes for college admissions, financial aid and verification for undocumented students. Dynarski and Scott-Clayton (2006) demonstrated that up to 80% of the financial aid application's questions could be removed without impacting the efficiency and effectiveness of the process. Some questions, particularly those related to taxes, income, and net worth, frequently trigger frustration and anxiety.

Although the admission process and ISRT classification can become daunting for undocumented applicants, some factors positively affect college navigations and reduce the level of burdens this target population experienced. Among the factors that can significantly shape the experiences of undocumented students is social and cultural capital. Christensen et al. (2020) argue that individual differences in human capital can affect their interactions with the state and how they address bureaucratic procedures.

Those participants who found the admissions and ISRT process to be smoother had parents who had attended college. Previous studies have found that parental knowledge and familiarity with higher education were key factors that buffered applying for college (Enriquez 2011). More generally, individuals whose parents attended college were the most likely to go to college. As one interview participant observed:

So it was pretty smooth because I have been working on the process since I was ten. When I got into the country, my parents were very adamant that I was going to go to college, and they started to look for resources for me since I was 10 and so by the time I was set to apply for University. Then, we met a counselor that works with undocumented students at the University of Utah, and so she walked me through the process. She read all the personal statements that I had to submit to the University, and she also transferred the credits from high school that I took. P#17

Those participants who were encouraged to pursue higher education and received information and guidance also experienced a smoother application process. School staff play a crucial role in influencing the college choices of undocumented youth (Nienhusser, 2013). For example:

I am a first-generation student. I was in a program called AVID28 which works in California. This program is specifically to assist students who are low-income, first-generation students who have the potential to attend higher Ed, but they just need guidance. My AVID teacher, I told her, well, I'm not applying to any colleges anymore. I didn't want to go to higher education and she told me: "You're going to apply" and I applied. I got into all the institutions. I applied for it (ISRT and financial aid), and I got both and scholarships. (P#1)

Similarly, another interviewee reported:

She (high school counselor) is the one that helped me out a lot. She always kept me motivated to apply for all these schools, for all these scholarships. Even if I wanted to talk to her about personal business, she would always be there to help me out. She just honestly, she was just there at the right time when I needed somebody, not because she was pressured or because she was told that she needed to help me, but because as a human being, she was there and she also understood my situation, you know, she is Hispanic. (P#3).

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28 AVID refers to the Advancement Via Individual Determination Program in California which aims to prepare students for college eligibility.



This is consistent with previous work that has found that students who received high school counseling about the college application process were most successful in ultimately enrolling in college (Castlemant et al. 2014).

For some participants, building and getting involved in social networks is a way of accumulating cultural and social capital and accessing institutional resources (Perna 2006). Although many might view being undocumented as an additional burden, it also might help build cultural and social capital from which the families and acquaintances of undocumented students might benefit.

Another factor that evidently was important in helping undocumented applicants be admitted and complete ISRT requirements was associated with support from an admissions officer who identified with the circumstances of undocumented youth and who represented their interests. Many observers believe that colleges should recruit staff at different levels who reflect the diversity of the groups they serve. Scholarship on public administration argues that representative bureaucrats tend to be more receptive to seeking mechanisms that remedy organizational rules that affect individuals with whom they share identities (Larson and Ovando 2001). Interview respondents who found the process of meeting admissions and ISRT requirements easier had support from admissions officers who seemed more representative of and empathetic with their needs. For instance,

When I was applying for the childcare scholarship, the lady who was head of all that was the one who told me about the ISRT eligibility and all the different scholarships I could apply for just being undocumented. But I was upset with the admissions officers, they didn't tell me, just that lady, and she was Hispanic. P#5

Finally, interviewees and respondents offered several recommendations for assisting applicants in better navigating the admission process and accessing ISRT. (See appendix B.)

## **Limitations**

However provocative the findings just presented may be, the numbers of undocumented youth interviewed (19) and the completed surveys (for key items, an average of 122) do not yield statistically generalizable results. However, as Luker (2008) suggests, qualitative research, although not generalizable in statistical terms, measures voices of those experiencing the phenomenon being investigated and allows us to find evidence that quantitative data cannot "count."

Another limitation is that the samples for both the interviews and completed surveys were unrepresentative. Participants were primarily women, and most of the participants in both the survey and the interviews live in states with large populations of undocumented immigrants (California and Texas), which could obscure significant factors associated with burdens faced by undocumented students in other states. More importantly, appropriate sampling frames of undocumented youth between the ages of 17 and 25 simply do not exist. The findings, then, are best seen as exploratory and instructive.

Another limitation relies on the fact that most of the participants interviewed for this study are currently enrolled in a higher education institution. Only three were not able to attend college due to burdens associated with their unlawful status. Although the participants talked about the barriers of applying and of qualifying for ISRT, not having a greater number of participants who were not able to access higher education may well overlook other unexplored administrative burdens. It may be that many of undocumented youth who do not attend college

face higher compliance and psychological costs compared with those undocumented youth who finally do enroll and benefit from ISRT.

In addition, not comparing learning, compliance, and psychological burdens of undocumented youth with those experienced by other groups, such as first-generation, African American, and Asian American applicants, risks both overemphasizing the distinctiveness of the burdens of undocumented students and overlooking burdens experienced by other groups. Further research should consider how administrative burdens affect other population groups in order to find patterns and possible similarities and differences with undocumented youth.

## **Conclusion**

Undocumented immigrants face unique burdens when seeking access to higher education and eligibility for ISRT. They navigate several complex institutional contexts, including multiple rules at different organizational levels and interactions with college admissions officers. Both administrative rules and admissions officers' attitudes may facilitate or obstruct this population's access to college and their eligibility for ISRT.

The experiences of undocumented students reflect feelings of exclusion. Undocumented youth must provide extra documentation and cope with circumstances that most of their counterparts do not confront in order to benefit from ISRT and state financial aid, demands that pose significant learning costs. The need for documentation of residence, income, and taxes from applicants and their parents and interaction with multiple government entities produce higher compliance costs. Furthermore, for many undocumented applicants, being exposed to deeper scrutiny of their documentation reinforces feelings of unfairness and not belonging, generating higher psychological costs.

Institutional requirements to qualify for ISRT reflect implicit standards about what constitutes a “deserving” recipient. In some colleges, the admissions process reflects a model of an individual applicant who possesses characteristics such as being white, a citizen or full legal resident, and a taxpayer (or one’s dependent). Although the admissions process appears fair—since it is the “same” for everyone--undocumented youth see meeting requirements to benefit from ISRT as a burdensome experience that demands meeting extra documentation and paperwork due to their unlawful status. Scholars have long observed that policies or procedures that seem neutral may have unequal impacts on various target groups (Chudnovsky and Peeters 2021), which may reinforce social inequalities.

Substantial differences in the ease of addressing burdens emerged between respondents who are DACA recipients and those who are not. Having DACA status does not guarantee that participants avoid having to provide extra documentation, despite temporary legal permission to study and work. During the interviews, DACA recipients highlighted that they are considered “part-residents” and not “full-residents,” making claiming ISRT eligibility difficult since the required application forms and documents design do not include a temporary resident option. Yet, those undocumented youth who are not DACA recipients face even greater barriers. They could be considered “more illegal” without temporary residency cards and temporary SSNs, making their paths to higher education rockier. Two of those interviewed who are not DACA recipients have not attended college because they lacked documents even though they reside in states with ISRT and have graduated from state high schools. As Warner (2005) argued, U.S. immigration policy, by identifying different categories of individuals and their relationships to the country, affects the roles and rights of every individual, and their role in society.

When undocumented immigrants apply for public benefits, one of the most significant negative features is associated with psychological costs, which are intertwined with a deep sense of fear. Public administration scholarship has not devoted much attention to this aspect of administrative burdens. This unique feeling of fear about being undocumented--not experienced by other target groups (e.g., African Americans, LGBTQ people, low-income individuals)--magnifies the administrative burdens that this population faces. In this study, most of the undocumented applicants evidently had an encompassing fear of the administrative power that public higher education institutions and admissions officers may have over them. It is a constant fear and anxiety about not knowing if they will be admitted and be able to benefit from ISRT. The fear also is about consequences for their families. Furthermore, their expressions often evoke feelings of total surrender.

Public administration generally has paid little scholarly attention to the psychological burdens undocumented immigrants confront (Sullivan and Rehm 2005). Moreover, some studies have found that such populations normalize the emotional strain that comes from their unlawful immigration status (Cha, Enriquez and Ro 2019). The fear that some disadvantaged groups experience when they participate in public benefits and face bureaucratic procedures and public servants' discretion is an aspect that deserves more attention in public administration scholarship. Furthermore, whether and how powerless groups may be more susceptible to feelings of fear, resulting in a lack of autonomy when coping with bureaucratic procedures, calls for additional research.

Together, the findings from interviews and surveys with undocumented students provide numerous insights into the administrative burdens that undocumented youth face when applying to college and claiming ISRT. Until higher education policies for undocumented students

become less discretionary at the state and institutional levels, bureaucratic procedures and required documents and paperwork may become mechanisms of educational and civic exclusion. Those administrative procedures may become policy instruments (Herd and Moynihan 2018) that mediate their integration and shape their role in society.

The implications of this study for public administration suggest the importance of more fully understanding individual behavior and reasons for decision-making. Investigating the actions of those claiming public benefits may help illuminate for policymakers the nature of the problems that the policies they design address. Decisions to seek public benefits are shaped not only by economic needs but also by more psychologically based rationales. Therefore, public resources may be used more effectively and equitably if policymakers considered factors influencing individuals' behavior. Designing policies and administrative rules that consider individual behavioral factors may improve policy outcomes and better allocate resources to target groups that would benefit most from them.

More research also might examine the role of social and institutional networks in providing undocumented youth with accurate information that may influence and support college choices. High schools and institutions of higher education play critical roles in providing accurate information and supporting undocumented youth and other less advantaged individuals as they navigate the college application process and locate resources to achieve their educational aspirations. Institutions and admissions officers should be more transparent and purposefully communicate about ISRT rules and available resources.

The debate over undocumented immigrants and higher education has largely been limited to access. Although designing policies that enable access to higher education for this population

is critical, it arguably is not enough. Policies such as ISRT show that the availability of public benefits does not guarantee access to it.

## CHAPTER FIVE

### HOW ADMISSIONS OFFICERS PERCEIVE ADMINISTRATIVE BURDENS WHEN UNDOCUMENTED STUDENTS APPLY FOR COLLEGE

#### Abstract

Current public affairs scholarship has explored how the political values and perceptions of deservingness of street-level bureaucrats shape administrative burdens during policy implementation when eligible citizens claim public benefits. Extant research, however, has not investigated such phenomena with non-citizen target groups. Drawing from scholarship on street-level bureaucracy and administrative burdens and on analyses of quantitative and qualitative data, I examine the perceptions of deservingness of admissions officers in U.S. public colleges and universities, probing for possible associations with the extent of officer support for admissions requirements when undocumented students claim in-state resident tuition benefits in states where they are available. The findings suggest that admissions officers' political ideology, perceptions of deservingness, ethnicity, and interaction with undocumented youth as well as the type of institution are associated with officers' support for requirements when undocumented applicants claim in-state tuition. Such factors, however, are not sufficient to frame admissions officers' decisions. Such decisions also are affected by constraints from state laws and organizational rules.



## Introduction

*I interacted with a woman (admissions officer), I felt like since she knew that I was like an immigrant, and undocumented, in a way, she made it harder for me by asking for all of these documents that I felt like it was unnecessary.*

*Undocumented student in Virginia (#4)*

*Honestly, a lot of the paperwork depends on the admissions staff you come across. I definitely believe that there is bias. They automatically make assumptions.*

*Undocumented student in Utah (#2)*

These quotes illustrate how the administrative discretion of college admissions officers may reflect their beliefs about undocumented students. In the United States, considering whether undocumented immigrants should benefit from in-state resident tuition (ISRT) has produced ongoing debate. ISRT policy for undocumented students touches two streams of public discussion: illegal immigration and the growing costs of higher education.

In the U.S., undocumented youth can attend public colleges and pay in-state resident tuition (ISRT) in 19 states that passed legislation providing this public benefit between 2001 and 2020. Undocumented youth also can benefit from paying in-state rates in states with policies set by boards of regents or statewide higher education institutions (see Chapters One and Two). The cost of ISRT generally is about one-third to one-half of the cost of out-of-state tuition—the cost that undocumented immigrants otherwise would have to pay. ISRT is a public benefit because

states subsidize public higher education access by allowing undocumented youth to pay lower tuition, the same tuition rate that a state's citizens and legal residents pay. Under U.S. law, ISRT is public tuition assistance that is subsidized in part with state money. 29

States with ISRT have established requirements (e.g., attendance at and graduation from a state high school, signed affidavit of intent to become a legal resident) that seem straightforward to meet when undocumented students apply for college and claim such benefit. When the policy is implemented at the institutional level, however, several actors can affect how such requirements are applied (see Chapter Two). Ultimately, higher education personnel and street-level bureaucrats (SLBs), particularly admissions officers, shape admissions requirements and validate documentation when undocumented youth apply for college and claim ISRT benefits (Flores 2016; Nienhusser 2018; Nienhusser and Connery 2021).

Although SLBs' decisions are expected to be based on statutory requirements and to be consistent with organizational rules (Romzek and Dubnick 1987; Weissert 1994), in some cases, their decision-making may be value-based (Bell et al. 2020; Jilke and Tummers 2018; Keizer and Miller 2020; Soss, Fording and Sandford 2011). Previous work has examined the relationship between SLBs' political ideology, values, and perceptions of the deservingness of target groups and the officials' imposition of burdens when eligible individuals claim public benefits (Baekgaard, Moynihan, and Thomsen 2021; Bell et al. 2020; Nicholson-Crotty, Miller and Keiser 2021). No scholarly work has explored such relationships between SLBs and undocumented individuals when the latter claim public benefits to which they are legally

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29 8 U.S.C. § 1621 (2004).

entitled. Furthermore, no studies explore how other factors may influence the administrative discretion of SLBs in such circumstances.

Building on scholarship on street-level bureaucracy and administrative burdens, I explore the relationships between admissions officers' attributes, job tenure, race-ethnicity, political ideology, perceptions of the deservingness of undocumented applicants, and frequency of interaction with such population, and the extent of SLB agreement with admissions requirements when undocumented youth apply for college and claim ISRT. The analysis is based on qualitative and quantitative data from admissions officers' surveys collected in 2020.

The findings suggest that college admissions officers who describe themselves as non-white, politically liberal, and who show higher levels of agreement with granting ISRT benefits for undocumented youth are less likely to support stringently applied administrative requirements when undocumented students claim ISRT. These admissions officers tend to recommend "particularized" rather than "standardized" admissions procedures and rules for undocumented applicants. They support admissions requirements that respond to the distinctive circumstances of undocumented immigrants. In contrast, admissions officers who identify themselves as white, politically conservative, and have lower levels of agreement with granting ISRT benefits to undocumented youth are more likely to support more standardized admissions requirements and rules that reward merit. At the same time, the findings suggest that admissions officers also face constraints at the state and institutional levels that frame their decisions regardless of their willingness to facilitate the paths of undocumented youth to higher education.

This article makes two main contributions. First, it adds to administrative burdens scholarship by empirically exploring the hypotheses that SLBs' political ideology and perceptions of the deservingness of target groups are related to their support for specific policy

implementation requirements in a relatively unexplored policy area—higher education—and a distinctive group—undocumented youth. Second, it examines other variables that may help explain SLB interpretation and administrative discretion in shaping burdens that differ across states and higher education institutions.

In the following sections, I first elaborate on the role of SLBs in policy implementation. Then, I suggest how perceptions of deservingness may influence SLBs' support for administrative burdens. I next present hypotheses about factors that may influence admissions officers' perceptions of administrative burdens and describe the context of ISRT. I then present the research design and the findings. Finally, I conclude and discuss the implications for theory and practice in public administration.

### **Factors Influencing the Role of Street-Level Bureaucrats in Policy Implementation**

Numerous political actors shape administrative rules and procedures, from those who design a policy to those who implement it. Those policy designers, however, often do not pay much attention to the details that other actors—particularly street-level bureaucrats—may shape during implementation. Although "bureaucracy" typically is associated with established rules, organizational goals, and authority structures, "street-level" refers to what happens daily, where actions may be quite different from what happens in spaces of formal authority and established routines (Lipsky 1980; Smith 2003; Tummers and Bekkers 2014).

SLBs include those officials who interact directly with the public (e.g., teachers, police, social workers, trial judges, immigration officers) and who have broad discretion over delivering benefits (Lipsky 1980, p. xi). SLBs have administrative discretion in part because policy designs and goals may not always be stated clearly before implementation. In addition, SLBs must

exercise discretion when responding to challenges presented by the environment, by organizations implementing the policy, and by the public, all of which may be unpredictable (Brodkin 2012).

When SLBs exercise discretion, they affect policy implementation by interpreting policy and organizational rules and allocating scarce resources (Evans and Harris 2004; Tummers and Bekkers 2013). In effect, their discretionary practices concretely define the policy, and their decisions become the "true policies" (Lipsky 1980, p. xii). Hence, the role of the SLB is crucial since they personalize the administrative state in daily public experiences. The quality of the service they offer may shape the behavior of individuals and mark their experiences with the state (Auyero 2012; Barnes and Henly 2018; Burden et al. 2012; Soss 2005). Thus, they become mediators among the state, institutions, and the public.

Although SLBs occupy one of the last places in the command chain, their discretion can influence policy outcomes substantially. They establish routines, create means to deal with uncertainties, and make decisions (Lipsky 1980; Tummers and Bekkers 2013). However, such power is constrained by multiple factors, including authorizing legislation, organizational structures, rules, and procedures. Moreover, at the institutional level, time, information, financial and physical resources, and objectives may limit SLBs; these variables may be ambiguous and contradictory and include idealized expectations of what SLBs should and can do (Lipsky 1980).

Although most SLBs are committed to their work, their environment frequently demands more pragmatic responses that may affect the attainment of policy goals and outcomes. SLBs' jobs, then, frequently are complex, since they respond to rules at different organizational levels and act in contexts that require interpretation, improvisation, and responsiveness to particular cases. They often must cope with ongoing tensions among increasing demands for public

benefits or services, scarcity of resources, and ambiguous policy and institutional goals (Lipsky 1980; Smith 2003). Thus, bureaucrats may respond to pressures in ways that, although their actions may be "well-intentioned" and consistent with policy and organizational rules, the responses may have unpleasant effects for recipients (Evans and Harris 2004; Lipsky 1980; Tummers and Bekkers 2014).

In addition, when it comes to the margin of discretion of SLBs to grant public benefits, potential recipients may label them "fairy godmothers" or "villains." Relationships between SLBs and members of the public are not always easy, and they may become conflictual. The interests and expectations of individuals who claim public benefits and those of SLBs differ and may even be contradictory. Potential beneficiaries come from distinctive contexts, and they typically expect to be treated in personalized ways. Instead, SLBs follow organizational rules and seek to treat individuals in more standardized ways, which they may view as being consistent with acting fairly. In doing so, SLBs classify individual problems and demands into simplified categories (Lipsky 1980; Hasenfeld 1981) that can result in administrative exclusion (Brodkin and Majmundar 2010). Yet, SLBs do not exercise administrative discretion by simply complying with institutional rules. Instead, SLBs typically interact with and respond to large numbers of individuals from varying backgrounds and experiences. Rather than make "standard" decisions, their responses become particularized as they decide on a case-by-case basis. Since rules and procedures rarely fit each individual or every circumstance, SLBs must exercise discretion in responding.

Public administration scholarship contends that SLBs' beliefs and values often drive how they exercise administrative discretion (Baekgaard, Moynihan and Thomsen 2021; Bell and Smith 2019; Bell et al. 2020; Jilke and Tummers 2018; Keizer and Miller 2020; Peeters 2019;

Weissert 1994). Further, SLBs' decisions may be influenced significantly by their perceptions of participants' deservingness (Baekgaard, Moynihan and Thomsem 2021; Bell et al. 2020; Gilke et al. 2018). Recent empirical work also has explored factors such as SLBs' personal experiences and traits that may influence policy actors' tolerance of administrative burdens (Aarøe et al. 2021).

Perceptions of the deservingness of claimants matter when SLBs exercise discretion, make decisions and allocate resources. Such perceptions of deservingness may be reinforced by public narratives and rhetoric associated with a political ideology (Bell et al. 2020, 3) or subculture in which policy implementation is embedded (Elazar 1984; Morgan and Watson 1991). How SLBs manage procedures and requirements may respond to their social constructions of potential recipients, particularly perceptions of deservingness of public benefits (Baekgaard, Moynihan and Thomsen 2021; Herd and Moynihan 2018; Bell et al. 2020). In this context, SLBs' shaping of burdens and decisions can be viewed as political instruments, since they allocate public benefits to claimants based on political values and beliefs (Bell et al. 2020; Herd and Moynihan 2018).

SLBs shape administrative burdens by choosing what information to give to eligible individuals, the amount of paperwork they ask for, or how helpful they are when applicants ask questions or complete forms (Herd and Moynihan 2018; Bell et al. 2020). Further, SLBs' administrative discretion may magnify burdens in several ways. Officials may, for instance, demand face-to-face meetings beyond what regulations require, set appointments at inconvenient times, or over-schedule appointments, producing long waiting times (Brodkin and Majmundar 2010, 831). SLBs also may misinterpret rules, lose paperwork, or fail to return phone calls from potential recipients (Barnes and Henly 2018; Thomas 1986). Clearly, these difficulties may

discourage claimants' participation and shape future interactions with the administrative state (Bruch et al. 2010; Campbell, 2012; Moynihan and Herd 2010; Moynihan and Soss, 2014; Schneider and Sidney 2009).

Unpleasant experiences with street-level bureaucrats may generate negative feedback mechanisms through anecdotes shared in social networks (Auyero 2012; Mettler and Mallory 2014). For example, slow or unresponsive assistance transmits a message that the government does not value claimants' time (Mettler and Soss 2004). When bureaucratic procedures appear to be applied arbitrarily, they may generate and reinforce mistrust and fear (Heinrich 2016). These unpleasant experiences and attitudes disproportionately affect disadvantaged individuals who tend not to be well positioned to bear burdens (Chudnovsky and Peeters 2020; Herd and Moynihan 2018).

The following section describes institutional and individual variables that might influence how admissions officers perceive the deservingness of undocumented students and the decisions the officers make when such individuals apply to college and claim in-state resident tuition.

### **The Role of Admissions Officers in ISRT Implementation**

In the United States, undocumented youth can benefit from ISRT policy when they enroll in colleges or universities. This benefit is available in 19 states through legislation and in seven states at the discretion of boards of regents or higher education agencies (NCSL 2021; see Chapter One). In general, to access the benefit, undocumented youth must have studied consecutively between 2-3 years in a state high school, have graduated or received a GED, and sign an affidavit stating their intention to legalize their immigration status.



When seeking access to higher education, undocumented students must interact with admissions officers—SLBs here—when they apply for college and claim ISRT. The role of admissions officers is significant; they become the first "gatekeepers." They have a good deal of discretion to shape admissions rules and, in some cases, the power to grant or deny admission (Flores 2016; Nienhusser 2018; Nienhusser and Connery 2021). Further, admissions officers play crucial roles as mediators among state policies, institutional rules, and the circumstances of undocumented applicants (Enriquez et al. 2019). Such staffers decide if the documents undocumented applicants supply meet the criteria for qualifying for ISRT and align with institutional rules. They may be more flexible in some cases and less so in others. Indeed, scholarship investigating how higher education personnel implement ISRT policies for undocumented youth has demonstrated how variations in interpreting requirements result in substantial differences in policy outcomes (Nienhusser 2014; 2018; Nienhusser and Espino 2016).

Differing institutional interpretations, administrative practices, and application by college personnel and admissions officers can affect policy outcomes within and among states and institutions. For instance, a state high school diploma and a school certification that the applicant has studied for between two and three consecutive years in a state meet ISRT residency requirements for some higher education institutions and admissions officers. For others, such evidence is not enough, and they require that undocumented applicants provide extra documentation such as utility bills, evidence of property ownership or leases, or driver licenses. In still other cases, some institutions and admission officers may require documents associated with immigration, citizenship, and tax payments.

Although admissions officers may have good intentions, some scholars suggest that they often act as compliance officers for ISRT and other state and institutional financial aid policies for undocumented youth (Castrellon 2021). In following rules, they will avoid violating state and institutional policies and seek to safeguard fairness and transparency. For instance, Nienhusser (2018, 435) found that “community colleges in Connecticut were grappling with fines from the Internal Revenue Service (IRS) for discrepancies in Social Security numbers on 1098 Forms. Many of these disparities, officials surmised, were from students who lacked permanent status.” Then, these IRS auditing practices prompted admissions officers to revisit verification practices and make decisions that could sometimes affect undocumented students whose SSNs did not match the official forms.

Nonetheless, although most requirements established at the state and institutional levels are beyond the administrative discretion of admissions officers, the officers have the power to shape some ISRT requirements and decide about the validity and necessity of documents (Flores 2016; Nienhusser 2014; 2015; 2018). For example, Nienhusser (2018) found that a Connecticut admissions officer allowed an undocumented applicant to benefit from ISRT without attending the required number of years in a state high school. Likewise, admissions officers in California assisted undocumented students in overcoming changing state requirements and processes to help them qualify for ISRT (Nienhusser 2018). More recently, Nienhusser and Connery (2021) highlighted the margin of discretion that some college personnel have in facilitating or obstructing the access of undocumented youth in their institutions with qualifying for in-state tuition. Similarly, when the survey asked admissions officers how the admissions process might be made easier for undocumented youth, some noted actions to facilitate the access of undocumented applicants:

We eliminated the need to have a SS#. We don't need it for admissions purposes, this way students don't feel they have to have one or lie and falsify info.  
Admissions officer in Illinois #62

We have done our best to limit items that would exclude undocumented students from being able to apply such as not requiring proof of residency, making SSN an optional field, and reforming our responses to questions about citizenship.  
Admissions officer in Washington #206

Other admissions officers may appear less empathetic, which could result in less effort to facilitate admission, and in some cases, thwart college access. Such comments included a suggestion that applicants should “[ask] for money in their countries (Admissions officer, Florida #77). An officer in Texas (#80) noted: “It's already a smooth process. Why should it be easier for undocumented folks? Shouldn't it be equal across the board?” Admissions officers play important roles in shaping undocumented immigrants' experiences: they hold key information to guide and support them through unfamiliar college admissions processes. Moreover, several studies demonstrate that interactions with college personnel shape undocumented youth' attitudes and influence their choices as they navigate admissions processes and access ISRT and state financial aids (Flores 2016; Nienhusser 2014; 2018). In this context, in which ISRT is subject to various institutional interpretations and discretion, one might conclude that the level of animosity that undocumented students face in the admissions process and their access is determined in part by the "good" or "bad" will of admissions personnel. As an undocumented student in Utah pointed out, "Honestly, a lot of the paperwork depends on the admissions staff you come across" (Undocumented student # 2).

Yet major questions remain. Which factors might influence some admissions officers to show more empathy and provide help than others in assisting undocumented youth who are

applying to college and hope to benefit from ISRT? How do admissions officers grapple with technical and political criteria when they examine the applications of undocumented students? How do admissions officers handle an undocumented student's application that meets state policy requirements but not those imposed at the institutional level? What might influence the decisions of admissions officers? The following section briefly examines some of the factors that might influence admissions officers' attitudes when implementing ISRT for undocumented youth.

### **Factors Influencing Admissions Officers**

Many factors may shape the administrative discretion of admissions officers when undocumented youth apply for college and claim ISRT. Levels of organizational control, organization culture, workloads, external environment, and claimants' characteristics all may affect SLBs' attitudes and interpretations and shape how they allocate public benefits (Hupe and Buffat 2014; Scott 1997). In addition, admissions officers' political beliefs, values, levels of interaction with applicants, and perceptions of claimants' deservingness may be associated with the decisions they make.

Differing admissions requirements and rules across institutions (e.g., two-year v. four-year public colleges) may substantially influence admissions officers' decisions. For example, in four-year colleges and universities, along with verifying requirements such as state residency and graduation from high school, admissions staff also must assure applicants meet other standards (e.g., SAT or ACT scores, high school grade point averages, recommendations, writing samples). Some institutions may require criminal background checks. In contrast, in community colleges, given their nature as open-access institutions, admissions criteria are less selective, and they can

simply be limited to verification of high school graduation and residency in a state (see Chapter Three).

How long admissions officers have had their positions also could affect how they apply requirements. Previous studies show a positive relationship between SLB job tenure and support for more administrative requirements when individuals claim public benefits (e.g., Honig 2006). This may result from adhering to existing organizational rules or from "getting used to doing things one way" without always considering applicants' differing contexts. One might expect that admission officers with longer tenures would consider specific admissions requirements and rules necessary regardless of changing policy environments or differing applicant circumstances, reflecting both the greater ease of following routines and possible concerns with being efficient or providing "fair" treatment.

The amount of interaction between admissions officers and undocumented immigrants may also play an important role in decisions. Fussel (2014) found that public officers who interact more frequently with immigrants tended to show greater tolerance and empathy for them. Similarly, other studies suggest that increased interactions between native- and foreign-born residents are associated with more positive views of immigration (O'Neil and Tienda 2010). Then, one might expect that admissions officers who interact with undocumented applicants more frequently would show greater empathy and have greater flexibility in applying admissions requirements.

The race and ethnicity and previous immigration status of admissions officers also may be relevant when shaping burdens and granting admissions. According to theories of representative bureaucracy, SLBs who identify with the race, ethnicity, gender, or other characteristic of a target group member will be more likely to take actions and make decisions

that address the needs and the interests of the group members (Bradbury and Kellough 2008; Meier 1993b; Miller and Keiser 2021). For instance, Nienhuser and Connery (2021) point out that some admissions officers with family immigration histories show greater willingness to facilitate the college application of undocumented immigrants. In the study reported here, since most of undocumented immigrants are Hispanic, it might be expected that admissions officers who self-identify as Hispanic/Latino/a would be more supportive of reducing admissions requirements and offering greater flexibility in applying requirements when undocumented applicants claim ISRT benefit (Passel and Cohn 2019).

Public opinion and narratives around undocumented immigrants may affect admissions officers' attitudes toward undocumented youth when they apply for college and claim ISRT benefits. Since 2001 when states began to enact ISRT statutes, some legislators and advocacy groups have questioned whether it is fair to give taxpayer-funded subsidies and public services to undocumented immigrants—individuals they consider to be undeserving given their lack of citizenship or legal residency (Spakovsky and Morrison 2019). Such sentiments may be especially common in states where social constructions of immigrants evoke images of criminality (Flores and Schachter 2018; Warner 2005, Tosh 2019; Wang 2012) or freeloading on public benefits (Hayness, Lee Merolla and Ramakrishnan 2016; Viladrich 2012, 2019; Yoo 2008).

Negative narratives contend that "[g]ranting ISRT [is] encouraging illegal immigration and forcing taxpayer parents to subsidize the education of illegal immigrants while disadvantaging students who are citizens; that is fundamentally unfair" (Spakovsky and Morrison 2019, 1). For instance, in states such as Texas and Florida, legislation has been introduced to

return to past in-state tuition policies that excluded undocumented applicants (Vargas 2011; Canizales 2021).

In contrast, more positive narratives contend that granting ISRT benefits to undocumented immigrants contributes to the U.S. economy and society. Advocates point out as well that expanding educational opportunities for undocumented youth does not exclude citizens or legal residents. One might expect that narratives both for and against ISRT echo in public opinion and might influence or reinforce admissions officers' perceptions and decisions.

Public administration studies have examined how SLBs' political ideology and perceptions of deservingness of target groups are associated with their support of administrative rules when different groups apply for benefits (Baekgaard, Moynihan, and Thomsen 2021; Bell et al. 2020; Pierce et al. 2014). More liberal SLBs are more likely to perceive increasing administrative burdens as being unjust, with negative impacts on claimants (Baekgaard, Moynihan, and Thomsen 2021; Bell and Smith 2019; Bell et al. 2020). In contrast, more conservative SLBs tend to view administrative requirements as necessary to increase efficiency and reward individual merit and deservingness (Baekgaard, Moynihan, and Thomsen 2021; Bell et al. 2020; Keiser and Miller 2020). Thus, one might expect that admissions officers' political ideology and their perceptions of deservingness would be associated with their support for administrative requirements and rules when undocumented youth claim ISRT.

Admissions officers may impose what they perceive to be "appropriate" levels of burden in the application process that vary with and depend on their perceptions of the "deservingness" of undocumented students when they apply for college and claim ISRT. Jilke and Tummers (2018) suggest, for example, that for some SLBs, perceptions of hard work, contribution, and "earned" deservingness influence the prioritization of claimants and allocation of public benefits.

One might expect that admissions officers who view undocumented students as brave, potential entrepreneurs, and not involved in their parents' decisions to immigrate may be more inclined to provide guidance or be more flexible with admissions requirements. On the contrary, those who perceive undocumented applicants to be lawbreakers or freeloaders on public benefits, with little academic or personal merit, will tend to impose more burdens, not address their concerns, or deny admission or eligibility for ISRT.

The factors that may influence college admissions officers and how they might respond to undocumented applicants suggest several hypotheses:

### **Hypotheses**

*Hypothesis 1:* More conservative admissions officers are more likely to perceive as important requirements that increase the level of administrative burdens on undocumented applicants (provision of, e.g., social security numbers, residency, citizenship, and immigration documentation). In contrast, admissions officers identifying as more liberal are less likely to support requirements that increase the level of administrative burdens on undocumented applicants.

*Hypothesis 2:* Admissions officers with a more positive perception of the deservingness of undocumented youth to access higher education are less likely to perceive as important requirements that increase the level of burdens on those students. In contrast, admissions officers with more negative perceptions of the deservingness of undocumented youth will be more likely to perceive administrative requirements as being more important.

*Hypothesis 3:* Admissions officers who interact more frequently with undocumented applicants will be more likely to perceive administrative requirements as being less important. In



contrast, admissions officers who interact less frequently with undocumented students will be more likely to perceive administrative requirements as being more important.

## **Research Design**

To examine the perception of admissions officers regarding requirements when undocumented youth apply for college and claim ISRT and examine these hypotheses, I conducted an online survey of admissions staff at public two-year community colleges and four-year colleges and universities located in the 19 states that grant ISRT through legislation. The surveys were administered from August through December 2020.<sup>30</sup>

Limiting the study to admissions officers who work in states that grant ISRT to undocumented immigrants permits examining administrative burdens that focus on the policies, programs, and jurisdictions that grant public benefits to entitled individuals. Furthermore, previous studies have suggested that undocumented students' enrollment rates are notably higher in the states where this public benefit is available (Amuedo-Dorantes and Sparber 2014; Kaushal 2008).

Based on a list of public community colleges and four-year colleges and universities located in states that grant in-state tuition to undocumented students (U.S. Education Department, 2020), I searched the institutions' website directories for the admissions officers and emailed 2070 invitations to participate in the study. As of January 25, 2021, I received 216 surveys, but this study considers only complete surveys to carry out the data analysis, it is between 205 and 208 surveys.

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<sup>30</sup> This followed the IRB 20-477 approval in July 2020.

Clearly, it would have been better to have received more responses; at least 30% for each of the 19 states would have increased the sample's statistical power (Dattalo 2008). Since I cannot provide such response rates at this time, in what follows I treat the results as exploratory and instructive instead of statistically conclusive and representative.

Since the survey design contained closed and open-ended responses, both quantitative and qualitative analyzes are presented. Quantitative analysis aims to test the hypotheses proposed earlier. Qualitative analysis examines the observations of the admission officers regarding the ISRT requirements that undocumented applicants must meet, their perceptions of whether the application process should be more particularized or more standardized, and their recommendations.

### **Testing Hypotheses**

To examine whether there are associations between the political ideology of admissions officers, their perceptions of the deservingness of undocumented immigrants to access higher education and benefit from ISRT, the frequency of interactions with such applicants, and their level of support of the administrative requirements and rules when undocumented youth apply for college, I first carried out bivariate analyses. Then, I ran ordinary least square regressions (OLS) considering three independent variables (political ideology, perceptions of deservingness, and frequency of interactions with undocumented applicants). Finally, I control for other variables that also could be associated with levels of support for administrative burdens (e.g., admissions officers' gender, ethnicity, job tenure, and type of institutions).

### Dependent Variable

To test hypotheses 1, 2 and 3, the dependent variable--“level of support for admissions requirements”--is an index of the admissions officers’ perceptions of the importance of ISRT requirements when undocumented youth apply for college and claim in-state tuition.<sup>31</sup> The level of importance that admissions officers gave to each requirement was measured on a five-point Likert scale, which ranged from very important (5) to not important (1).<sup>32</sup> Following Bell et al. (2020) and Baekgaard et al. (2021), creating an index of ordinal responses to such items is appropriate. An index is the best tool to aggregate items and can measure the relative change in a sample (Little et al. 1998). The index was constructed by adding the item responses for each individual and weighing them based on the range between the maximum and minimum possible values of the items. For example, if an admissions officer rated each of the six requirements to access ISRT with the minimum value [“not important” (1)], the total value for that individual would be 6 (1\*6). On the other hand, if an admissions officer rated the six requirements as “very important” (5), the total value would be 30 (5 \*6). Then, the range is 24 (30-6). The index value per individual would be reflected in the following equation, whose values always range from 0 to 1:

$$LSAdm.ReqIndex_i^{33} = \frac{\text{Admissions officer } \sum R_i - \text{Min (6)}}{30 - 6 [\text{range}]}$$

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31 The admissions requirements asked were: “i. Attending an in-state high school for a specified period (e.g. 1-3 years), ii. Graduating from a high school or receiving a GED, iii. Providing a Social Security Number, iv. Providing citizenship documentation (e.g., visa), v. Proof of state residency, and vi. Signing an affidavit.”

32 A Likert scale is used to measure the strength/intensity of a perception, attitude, or agreement.

33 This index is similar to those in Bell et al. (2020) and Baekgaard et al. (2021).

Where: Admissions officer  $\sum R_i$  is the sum of the officer's rating of each requirement. According to this equation, for the first admissions officer, the index score would be 0, and for the second it would be 1.

For example, in this study, admissions officer #85 rated requirements i, ii, v, and vi as "very important" (5), while rating items iii and iv "not at all important" (1); subtracting 6 from the total (22-6 = 16) and dividing by 24 yields an index score of 0.66. Index scores that are closer to 1 mean that admissions officers view the six admissions requirements as being more important. In contrast, values closer to zero suggest that the officers considered requirements as being less important compared to other respondents.

### Independent Variables

For hypothesis 1, the independent variable taps admissions officers' self-reports of political ideology. Since this is a nominal variable, following similar work (Bell et al. 2020), it was operationalized as a dummy variable (conservative and slightly conservative=1; liberal, slightly liberal and middle on the road=0). The initial bivariate test was:

$$\text{LevelSupportAdmReq}_{i\text{index}} = \alpha + \beta_1 \text{DummyPol.Ideology}_i + \text{error} \quad (i)$$

In hypothesis 2, the independent variable, "Perception of deservingness of ISRT benefit for undocumented youth," is an index that taps respondents' level of agreement with four statements about granting ISRT benefit. The perceptions were measured using Likert-scales ranging from strongly agree (5) to strongly disagree (1).<sup>34</sup> The index was constructed by adding

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<sup>34</sup> The items were selected from the statements of supporters and opponents of ISRT reported in National Conference of State Legislatures (2020, p. 1): "i. Granting in-state tuition rates to undocumented students gives an incentive for attending college, and eventually contributing to a state's society and economy"; ii. "Granting in-state tuition rates to undocumented students provides incentives

the responses for each individual and weighing them based on the range between the maximum and minimum possible values of the items. For example, if an admission officer rated the four statements with the minimum value ["strongly disagree" (1)], the total value for that individual would be 4 (1\*4). If an admissions officer responded "strongly agree" (5) to all four statements, their total value would be 20 (5 \*4). The range, then, is 16 (20-4). The index value for each individual would be reflected in the following equation:

$$\text{Perc.DeservignessIndex}_i = \frac{\text{Admissions officer} \sum \text{Statement}_i - \text{Min (4)}}{\text{Range (20 - 4)}}$$

Where:

Admissions officer  $\sum$  Statement<sub>i</sub> is the sum of the responses to each statement by each admissions officer.<sup>35</sup>

Based on the index of deservingness, hypothesis 2 is tested using:

$$\text{LevelSupportAdmReq}_{i\text{Index}} = \alpha + \beta_2 \text{Perc.Des}_{i\text{Index}} + \text{error} \quad (\text{ii})$$

In hypothesis 3, the independent variable is the level of reported interaction with undocumented youth, with survey responses including often (3), sometimes (2), or seldom (1).

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for people to immigrate illegally to the U.S, or to remain in the U.S. after their visas have expired;" iii. "Undocumented students who came to the U.S. with their parents as young children should not be deprived of higher education and ISRT benefit because of their parents' choices"; and iv. "Allowing undocumented students to pay in-state tuition takes opportunities away from U.S. citizens and legal immigrants."

35 The index scores range between 0 and 1. Values closer to one indicate that admissions officers strongly agree with the statements. On the other hand, values closer to zero mean that admissions officers strongly disagree with the statements.

Even though this is an ordinal variable, it was treated here as continuous (cf. Winship and Mare 1984), with the bivariate specification:

$$\text{LevelSupportAdmReq}_{i\text{Index}} = \alpha + \beta_3 \text{Int.Undc.Students}_i + \text{error} \quad (\text{iii})$$

Following the bivariate analyses, I included all three independent variables (political ideology of admissions officers, perceptions of the deservingness of undocumented immigrants when they claim ISRT benefit, and the frequency of interactions with such applicants) in an OLS regression.

$$\begin{aligned} \text{LevelSupportAdmReq}_{i\text{Index}} = \alpha + \beta_1 \text{DummyPol.Ideology}_i + \beta_2 \text{Perc.Des}_{i\text{Index}} + \\ \beta_3 \text{Int.Undc.Students}_i + \text{error} \end{aligned} \quad (\text{iv})$$

Finally, in order to control for other possible influences on levels of admissions officers' support for administrative requirements, I added officers' gender, race/ethnicity, job tenure, and the type of institution where they work in a fourth model.

$$\begin{aligned} \text{LevelSupportAdmReq}_{i\text{Index}} = \alpha + \beta_1 \text{DummyPol.Ideology}_i + \beta_2 \text{Perc.Des}_{i\text{Index}} + \\ \beta_3 \text{Int.Undc.Students}_i + \beta_4 \text{Gender}_i + \beta_5 \text{Race/Ethnicity}_i + \beta_6 \text{TenureOffice}_i + \beta_7 \text{TypeInst}_i + \\ \text{error} \end{aligned} \quad (\text{v})$$

Where:

$\text{Gender}_i$  is a dummy variable (1=women, 0=men, non- binary, other).  $\text{Race/Ethnicity}_i$  is a dummy variable (1=non-white [Hispanic, Asian, African American, Other], 0=white).

$\text{TenureOffice}_i$  is a continuous variable that taps the number of years the respondent has

been an admissions officer. TypeInst<sub>i</sub> is a dummy variable (1=two years community college, 0=four year college or university).

## Data Description

This section provides an overview of the survey responses. It reports general descriptive statistics on admissions officers' locations, attributes, and frequency of interaction with undocumented applicants. Included as well is information about admissions officers' perceptions about the importance of each of the admission requirements when undocumented youth apply for college and claim ISRT and about their views of the deservingness of this target population. Although 216 surveys were received, the number of admissions officers (N) varies for each item on the survey, since respondents were not required to answer all questions.

According to Table 1, more than half of the respondents (57.41%) were from Texas, California, Illinois, Florida, Virginia, and Washington. The third part (33.8%) from Oregon, Nebraska, Utah, Colorado, Georgia, New Jersey, New York, Connecticut, Kansas, Maryland, New Mexico and Rhode Island. The remaining 8.8% of respondents did not identify a state. 36

More than 60% of the respondents were women, with men making up most of the others. Approximately 61% of the respondents describe themselves as white, followed by close to

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36 Since the survey was anonymous, some admissions officers did not identify the state, city, or institution where they worked. Although the location could be found through the numbers of latitude and longitude displayed by the platform used for the surveys (Qualtrics), such numbers are not decisive in identifying the state of the respondent. In addition, it could also be the case that an admissions officer who did not identify the state, answered the survey in "Pennsylvania" according to the location latitude and longitude number, but works at a college located in another state. Also, and most important, the location does not affect the results in this study.

30%Hispanic/Latino/a, and almost 7% African Americans. Many respondents describe themselves as “liberal” (45.83%) or “slightly liberal” (22.22%).

More than half of the admissions officers who responded to the survey work at four-year public colleges or universities. Close to half of the respondents have been admissions officers for fewer than five years, while almost 27% have served for more than ten years.

**Table 1. Descriptive Statistics: Attributes of Respondents**

<b>Variables</b>	<b>N</b>	<b>Percentage (%)</b>
Location		
Texas	37	17.13
California	27	12.50
Illinois	22	10.19
Florida	14	6.48
Virginia	14	6.48
Washington	10	4.63
Oregon	8	3.70
Nebraska	7	3.24
Utah	7	3.24
Colorado	6	2.78
Georgia	6	2.78
New Jersey	6	2.78
New York	8	3.70
Connecticut	8	3.70
Kansas	5	2.31
Maryland	4	1.85
New Mexico	4	1.85
Rhode Island	4	1.85



No answer	19	8.80
Total	216	
Gender		
Women	132	61.68
Men	77	35.98
Non-binary	3	1.4
Prefer not to answer	4	1.85
Total	216	100
Race/Ethnicity		
White	131	60.64
Hispanic or Latino/a	59	27.31
Black or African American	15	6.94
Asian	7	3.24
Other	4	1.85
Total	216	100
Reported Political Ideology		
Liberal	99	45.83
Slightly Liberal	48	22.22
Middle of the Road	38	17.59
Slightly Conservative	13	6.01
Conservative	12	5.55
No answer	6	2.77
Total	216	99.97
Type of Institution		

Public two-years	91	42.13
Public four-years	122	56.48
No answer	3	1.38
Total	216	

#### Job Tenure

Less than 1 year	8	3.72
Between 1 - 5 years	100	46.29
Between 5 - 10 years	50	23.14
More than 10 years	57	26.85
No answer	1	0.04
Total	216	100

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According to Table 2, almost 70% of the admissions officers reported that they interacted with undocumented applicants “often” (23.61%) or “sometimes” (45.83%). The officers also noted that somewhat more undocumented students preferred to contact the admissions office via email rather than in person.<sup>37</sup> Almost 67% (143) of the respondents indicated that they preferred to follow more particularized admissions processes with undocumented youth compared to more standardized ones, consistent with other scholarship on street-level bureaucracy scholarship that finds that SLBs prefer to examine individual cases.

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<sup>37</sup> Similarly, other scholarly work has found that this target population prefers to interact with public organizations in more impersonal ways, given their perceptions of risk and desires for greater protection (Guberek et al. 2018).

**Table 2. Descriptive Statistics: Respondent Reports of Interactions with Undocumented Youth**

Variables	N	Percentage (%)
Frequency of Interaction with Undocumented Students		
Often	51	23.61
Sometimes	99	45.83
Seldom	64	29.62
No answer	2	0.009
Total	216	100
Preferred contact method		
By phone	42	19.44
By email	76	35.18
In-person	54	25.00
Third party	6	2.77
Other	31	14.35
No answer	7	3.24
Total	216	100
Preferred Application Process for Undocumented Applicants		
Standardized	63	29.16
Particularized	143	66.2
No answer	10	4.63
Total	216	100

Table 3 turns to the dependent variable, which taps perceptions of the importance of several administrative requirements when undocumented youth apply for college and claim ISRT. As noted earlier, values closer to 5 indicate that admissions officers rated the requirement as being more important than those who rated it closer to 1. Of the six requirements, graduating from high school was most important (Mean=3.15, SD=1.58), followed by attending a state high school (M=2.86, SD=1.62) and providing residency documentation (M=2.43, SD=2.68).<sup>38</sup> This suggests that overall admissions officers considered these requirements to be slightly to moderately important; the three also are those included in requirements to qualify for ISRT in most states and higher education institutions. Providing documentation of residency, however, has a notably larger standard deviation than any of the other requirements. This might suggest that some admissions officers would validate residency if an applicant meets the requirements for having attended and graduating from a state high school. Others, however, also might require other documentation such as utility bills, driver license, or payments of taxes that prove residency. These additional requirements—not formally part of ISRT policy— might help reinforce an applicant’s entitlement to and deservingness of the benefit, perhaps based on a criterion of belongingness to an area (see Chapter Two).

Also of note, respondents rated providing a SSN, a requirement that for some undocumented youth (e.g., non-DACA recipients) may represent a greater burden, as the least

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<sup>38</sup> When a means difference test (t-test) is done for all requirements by the reported political ideology of the respondent, the difference is statistically significant at  $p < .05$ . When a means difference test (t-test) is done for each admissions requirement, the differences between political ideology (Conservative and Non-Conservative) are statistically significant for all the requirements except graduating from a state high school or receiving a GED. Conservative admissions officers tend to give higher levels of importance to requirements associated with benefits from ISRT than non-Liberal admissions officers. See Appendix M, Complementary quantitative analysis.

important requirement. This could reflect admissions officers' awareness that some undocumented youth not having such documents.

When medians are examined, values are below the means for the requirements of SSN, citizenship documentation, proof of residency, and signing an affidavit. This suggests that for these requirements, more than 50% of the respondents considered their importance to fall between slightly important and not at all important (data skewed to the right). On the other hand, for the requirement to attend a state high school, the median is higher than the mean; more than 50% of the admissions officers rated this as a more important requirement (data skewed to the left). Those results are also reported in Appendix M.

**Table 3. Descriptive Statistics: Levels of Support for Administrative Requirements**

<i>Variables</i>	<i>N</i>	<i>Mean</i>	<i>Median</i>	<i>SD</i>	<i>Min</i>	<i>Max</i>
Attending a state high school	210	2.86	3	1.62	1	5
Graduating from a state high school	209	3.15	3	1.58	1	5
Providing SSN	208	1.48	1	1.06	1	5
Providing citizenship documentation	209	2.09	1	1.46	1	5
Providing residency documentation	211	2.43	2	2.68	1	5
Signing an affidavit	210	2.02	1	1.47	1	5

Table 4 turns to admissions officers' perceptions of the deservingness of undocumented youth to benefit from ISRT. On these items, admissions officers tend to strongly agree that undocumented students contribute to society and that they should not be excluded from public higher education because of having immigrated at a young age or because of decisions made by a relative. There was less agreement, though, that granting ISRT to undocumented students could

be an incentive for other immigrants to come to the U.S. or that undocumented individuals take opportunities away from citizens.

In general, although admissions officers show relatively high levels of support for undocumented students' access to higher education and acknowledge their contributions to society, they also recognize possible tensions and impacts of ISRT policy on immigration. (For greater detail, see Appendix L.)

When medians are considered, values are below the means for the statements i, ii, and iv. This indicates that more than 50% of the respondents strongly agreed with the statements. Yet, for statement iii, the median is slightly higher than the mean; more than 50% of the admissions officers either strongly or somewhat disagreed disagree (data skewed to the left). Those results are also clear in Appendix L.

**Table 4. Descriptive Statistics. Perception of Deservingness of ISRT for Undocumented Youth**

<i>Statements</i> <sup>39</sup>	<i>N</i>	<i>Mean</i>	<i>Median</i>	<i>SD</i>	<i>Min</i>	<i>Max</i>
i. Granting in-state tuition rates to undocumented students gives an incentive for attending college, and eventually contributing to a state's society and economy. (NCSL, 2020)	209	4.43	4	0.95	1	5
ii. Granting in-state tuition rates to undocumented students provides incentives for people to immigrate illegally to the U.S, or to remain in the U.S. after their visas have expired. (NCSL, 2020)	210	2.16	2	1.41	1	5

<sup>39</sup> Each of the statements come from the National Conference of States Legislatures, 2020. <https://www.ncsl.org/research/education/undocumented-student-tuition-overview.aspx>

iii. Undocumented students who came to the U.S. with their parents as young children should not be deprived of higher education and ISRT benefit because of their parents' choices. (NCSL, 2020)	210	4.63	5	0.95	1	5
iv. Allowing undocumented students to pay in-state tuition takes opportunities away from U.S. citizens and legal immigrants. (NCSL, 2020)	209	1.54	1	1.08	1	5

### Testing the Hypotheses

Table 5 reports the results of examining the hypotheses about admissions officers' views of the admissions and ISRT requirements for undocumented applicants. In each of the specifications, the key independent variables are statistically associated with higher levels of support for administrative requirements when undocumented youth apply for college and claim ISRT. In model 1, for example, admissions officers who describe themselves as conservative are more likely to perceive admissions requirements as being important when this target population applies. In model 2, those admissions officers who perceive undocumented youth as being less deserving of ISRT are more likely to view admissions requirements as being more important. Admissions officers who interact less frequently with undocumented applicants are more likely to perceive requirements as important the admissions requirements. Even so, despite these relationships being statistically significant at  $p < 0.05$ , each of the  $R^2$  is quite low, explaining less than 2% of the variation in officers' views of the importance of admissions requirements. When the three independent variables are considered simultaneously (Model 4), the  $R^2$  is somewhat higher.

The findings in model 4 weakly support hypotheses 1, 2 and 3. Since the independent variable (level of support of admissions requirements) is measured as an index-range, its value is

interpreted as a percentage. (See interpretations when using Likert-scale index from Baekgaard, Moynihan and Thomsen 2021, p 193). Then, according to the results admissions officers who self-report as conservative are more likely to support admissions requirements for undocumented youth in a 14.9 point increase. Similarly, those admissions officers who perceive providing ISRT for undocumented youth more negatively are more likely to support admissions requirements when this population claim such benefit in 29 percentage point increase.. Finally, those admissions officers who interact less with undocumented youth also increase their level of support for undocumented youth by 5.1%.

These results are consistent with previous studies that suggest greater support for administrative requirements by more conservative public officers (Bell et al. 2020), by SLBs with more negative perceptions of the target population (Aarøe et al. 2021; Baekgaard, Moynihan, and Thomsen 2021), and by SLBs who interact less often with target groups (Baekgaard, Moynihan, and Thomsen 2021; Howard 2017). These partial findings also indicate the level of officers’ support for admissions requirements cannot be attributed to a single variable.

**Table 5. Regression Results: Relationships between Support for Administrative Burdens and Political Ideology, Perception of Deservingness, and Frequency of Interaction with Undocumented Youth**

Independent Variables	Model 1		Model 2		Model 3		Model 4	
	Coef	SE	Coef	SE	Coef	SE	Coef	SE
Conservative	0.155*	0.037					0.149*	0.038
Perception of Deservingness			-0.394*	0.144			-0.298*	0.142



Frequency of Interaction with Undocumented Youth					-0.043**	0.024	-0.051*	0.230
Constant	0.290	0.020	0.083	0.093	0.419	0.050	0.202	0.978
N	208		205		208		205	
R-squared	0.07		0.03		0.015		0.121	

Standard errors are listed in parentheses \* p < .05 \*\* p < .10.

Table 6 reports regression results when control variables are added. Similar to Model 4, for hypothesis 1, college admissions officers who identify as conservative are more likely to support administrative requirements when undocumented youth claim ISRT benefits. Support for hypothesis 2 also remains: admissions officers who perceive undocumented youth as deserving ISRT are less likely to support administrative requirements. Yet, when controls are added, support for hypothesis 3 disappears.

Meanwhile, it is notable that variables such as race/ethnicity and type of institution are statistically significant in predicting level of support for administrative requirements, though the gender and job tenure of admissions officers are not. Admissions officers who are non-white (Hispanic, African American, Asian) are somewhat less likely to support administrative requirements when undocumented applicants apply for college and claim ISRT. This is consistent with previous scholarly work demonstrating that SLBs from minority groups are less likely to support application requirements when eligible individuals seek to access public benefits (Grissom, Kern and Rodriguez 2015; Watkins 2011). Admissions officers working at four-year colleges and universities are more likely to support administrative requirements. This result may be consistent with institutional rules and practices that demand more selective admission processes and higher requirements for admissions.

**Table 6. Regression Results: Relationships between Support for Administrative Burdens and Political Ideology, Perceptions of Deservingness, and Frequency of Interaction with Undocumented Youth and Control Variables**

Support for Adm. Requirement	Coef	SE
Conservative	0.143*	0.037
Index of perception of deservingness	0.289*	0.135
Frequency of interaction with undocumented applicants	0.026	0.023
Women	-0.015	0.033
Non-White	0.090*	0.035
Tenure	-0.022	0.018
Type of Institution	0.145*	0.033
Cons.	0.177	0.111
N	205	
R-squared	0.227	

Standard errors are listed in parentheses \* p < .05 \*\* p < .10.

## Qualitative Results: Admissions Officers' Open-Ended Responses

The survey also included an open-ended question aimed at eliciting admissions officers' arguments for and against establishing more *standardized* admissions requirements and procedures (for all applicants regardless of citizenship or resident status) compared to more *particularized* ones (with requirements that would be adjusted to undocumented applicants' circumstances). Regardless of their political ideology, most respondents considered the admissions requirements and documents to have been designed for citizens and legal residents. Most observed that trying to follow ISRT requirements and institutional admissions policies is complex and frequently results in excluding undocumented applicants. The respondents generally supported a more particularized admissions process for undocumented students (see appendix D). Two respondents supported a more particularized process:

As a community college, we need to be the MOST open access for education to everyone in the community, but we use standardized admissions' requirements and paperwork that limit undocumented student's access to education.

Admissions officer in Florida (#95)

I work with specialized populations of students in the admission process. Whenever standardized/universal policies are implemented they hurt different populations. Therefore, I am more inclined to create particularized admission requirements to meet the needs of specialized populations. Admissions officer in Florida (#206)

Those who supported more particularized applications and documents for undocumented immigrants frequently grounded their view in the principle of equity. For them, equal treatment is far from being fair. Admissions processes and requirements should respond to individuals' contexts. A self-identified liberal admissions officer noted:

To create equity it is not sufficient to treat each applicant equally. Rather, it is important to provide personalized service to underrepresented populations of students, including first-gen and undocumented students. Admissions officer in Florida (#149)

Admissions officers who reported they were “conservative” or “moderate” were more likely to support more standardized college application procedures, while more liberal admissions officers favored more particularized procedures. The most common reasons for supporting standardized applications evidently were based on the principles of efficiency, fairness, and rewarding merit. Some officers noted: “Standardized form[s] create fairness” (Texas,#136); “Standardized admission is more efficient” (Florida, #77); “You need standard requirements, otherwise you risk discrimination or favoritism if you allow a case by case basis” (Washington #166).

These criteria align with previous empirical studies that show that conservatives are more likely to value merit and equal treatment over adapting to individual circumstances. In the context here, more liberal SLBs may care more about the impact of increasing administrative burdens on disadvantaged individuals, which compromise policy goals to enhance equity (Bell et al. 2020; Rudolph and Evans 2005).<sup>40</sup> Appendix N shows responses organized by self-reported ideology.

### **Admissions Officers’ Recommendations**

To analyze responses to the survey’s request for suggestions and recommendations to address administrative burdens for undocumented applicants, I followed both Strauss and

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<sup>40</sup> Here, equity implies adjusting processes and rules for gaining access to public benefits so that these processes recognize the particular circumstances of individuals.

Corbin's (1998) methodology to code open-ended responses and recent work by Bell et al. (2020) examining perceptions of SLBs about administrative burdens in Oklahoma's Promise Program. I divided data into categories that included common terms and patterns. From that analysis, I identified seven thematic categories: i. Training for high school and college staff about ISRT policies and educational opportunities, ii. More counseling and staff dedicated to serving undocumented students, iii. Provision of accurate information, iv. Increases in financial support, v. Decreases in requirements, documents, and paperwork, vi. Implementation of a more equitable process in the admissions process, and vii. Efforts to reduce the fear that undocumented immigrants experience. See Appendix O.

Table 7 reports the percentages for each category. Among the respondents' top suggestions were providing accurate information (19.3%), offering more financial resources (19.3%), providing counseling and staff dedicated to serving undocumented applicants (16.9%), reducing the number of requirements, documents, and paperwork (15.7%), and building trust with undocumented youth to reduce fear (15.1%). These recommendations suggest an awareness of gaps in the admissions and ISRT qualification processes. These SLBs view offering accurate and timely information, designating staff to serve this population, and offering more financial resources as the most important steps to improve the access of undocumented youth to higher education.

**Table 7. Recommendations to Reduce Administrative Burdens, by Category and Frequency**

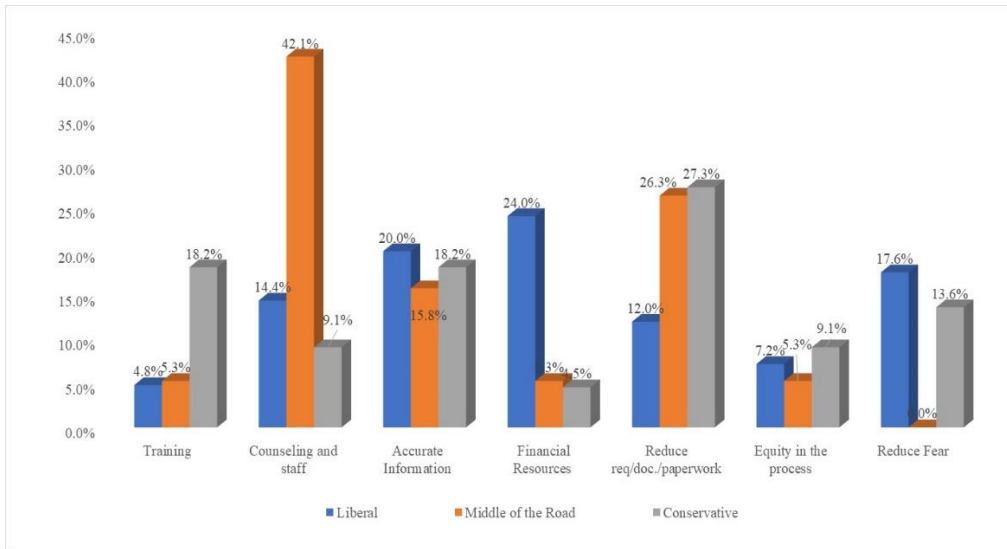
<b>Category</b>	<b>N</b>	<b>Percentage</b>
Provide accurate information	32	19.30
Provide financial resources	32	19.30
Offer counseling and staff dedicated to serving und. Students	28	16.90
Reduce the amount of requirements/documents/paperwork	26	15.70
Build trust to reduce fear	25	15.10
Equity in the admissions process	12	7.20
Training for high school and college staff about ISRT policies and educational opportunities	11	6.60
N	166	100

In three cases, comments overlapped categories; in these instances, responses were counted in each category.

Responses and self-reported ideology appear to be related. (See Figure 1 and Table 8.) Twenty-four percent of the admissions officers who responded to this question and who identify as politically liberal see providing financial resources as being most important consideration in easing barriers for undocumented youth; followed by providing accurate information (20.0%) and building trust (17.6%). Strikingly, 27.3% of conservative admissions officers recommended reducing the requirements, documentation, and paperwork needed to access and benefit from ISRT; this is followed by providing accurate information (18.2%). Among moderates, 42.1%

recommend counseling and having more staff dedicated to serving undocumented youth (compared with more than 14% of liberals and 9% of conservatives).

**Figure 1. Recommendations to Reduce Administrative Burdens by Category and Ideology**



**Table 8. Recommendations to Reduce Administrative Burdens by Category and Ideology**

Category/Ideology	Training for high school and college staff about ISRT policies and educational opportunities		Offer counseling and staff dedicated to serving und. Students		Provide accurate and timely information		Provide Financial Resources		Reduce the amount of requirements/docu ments/paperwork		Equity in the admissions process		Build Trust and reduce fear		Total
	N	Percent	N	Percent	N	Percent	N	Percent	N	Percent	N	Percent	N	Percent	
Liberal/Slightly Liberal	6	4.8%	18	14.4%	25	20.0%	30	24.0%	15	12.0%	9	7.2%	22	17.6%	125
Middle of the Road	1	5.3%	8	42.1%	3	15.8%	1	5.3%	5	26.3%	1	5.3%	0	0.0%	19
Conservative/Slightly Conservative	4	18.2%	2	9.1%	4	18.2%	1	4.5%	6	27.3%	2	9.1%	3	13.6%	22
Total	11	6.6%	28	16.9%	32	19.3%	32	19.3%	26	15.7%	12	7.2%	25	15.1%	166



## **Limitations**

Both the quantitative and qualitative findings, then, offer insight into how admissions officers view their work with undocumented youth. Yet, one should view the results as exploratory. The findings are not statistically generalizable given the relatively low number of participants (216) and the lack of representative responses from community colleges and universities in the 19 states in which ISRT is available. In addition, although 2,070 emails were sent to admissions officers in two-year community colleges and four-year colleges and universities, the response rate was barely 10%. This is not especially low for a study that did not have funding compared to similar studies with such support (e.g., Bell et al. 2020). The limited response may be due to numerous factors, including lack of interest in participating in this type of study, organizational adjustments in higher education institutions due to the uncertainty linked to COVID-19 restrictions during much of 2020, and reluctance to comment about support for ISRT policies that aim to extend higher education opportunities for undocumented youth.

Another limitation is that admissions officers' responses may not reflect their actual views of the deservingness of undocumented students or their assessments of the need to ask for certain information. Although the survey was anonymous, some still may have feared being identified or have been wary of showing bias toward or against undocumented students. Since the study did not offer any type of compensation, perhaps those who responded may have certain levels of empathy for undocumented students. Indeed, most of those who responded to the survey identified themselves as at least slightly "liberal," which also may have skewed responses, given previous studies demonstrating that more liberal SLBs are less likely to support bureaucratic procedures and rules that hamper participation from eligible individuals in public benefits.

## Conclusions

SLBs play critical roles in addressing administrative burdens and allocating public benefits to eligible individuals. They wield discretionary power to ease or increase the administrative burdens that policy claimants experience (Bell and Smith 2019; Bell et al. 2020). This power is framed by formal and informal practices that effectively "make the policy," constituting an "extra layer" of administrative rules. Ultimately, they are agents who interpret and manage policy implementation, becoming the visible face of government work (Keiser and Miller 2020; Lipsky 1980; Smith 2003).

Admissions officers who identify as being politically liberal are more likely to perceive undocumented youth as deserving, and non-white are less likely than others to support requirements when undocumented youth claim ISRT. They tend to agree that requirements such as having graduated from a state high school and resided in the state for a period of time suffice as requirements for qualifying for ISRT. As a Florida admissions officer (#95) wrote "For high school students, if they have graduated in the past year from a public high school and were there for a year, and maybe (provide) a photo ID should be all that is needed for admission."

Admissions officers who self-described as more liberal also tend to recommend more particularized admissions procedures and rules. They support admissions requirements that respond to the contexts of undocumented immigrants. Such respondents evidently recognize that many of the administrative requirements to qualify for ISRT may affect undocumented applicants disproportionately. This is consistent with scholarship that has demonstrated how administrative burdens affect highly disadvantaged target groups who are less well-positioned to address the burdens (e.g., Heinrich 2016; Herd and Moynihan 2018).

Conservative admissions officers are more likely to support more admissions requirements and to advocate for applying more meritocratic standards. They favor more standardized admissions procedures and rules that select “best matches” between institutions and students and reward deservingness based on merit. Yet, based on the open-ended responses, this evidently does not necessarily mean that more conservative admissions officers would impose further administrative burdens in order for undocumented youth to go to college and be eligible for ISRT. Instead, their rationale and interpretations appear to be more consistent with principles of fairness and efficiency and values rooted in legitimacy, rather than reflect views that such individuals are not deserving of ISRT.

Indeed, most of the more conservative officers’ recommendations include extending financial resources, providing information about the policy, and implementing strategies to reduce the fear that undocumented youth experience when they apply. For instance, one such respondent noted:

Not having to self-identify as undocumented in the application process, but find an easier way for them to self-identify earlier in the process without causing fear or anxiety. Not having to provide SS# or citizenship status. We want to ensure that they know of the resources that are available in the institution to support them (academic, financial and personal).

Admissions officer in Texas (#140).

This study also found that the administrative discretion of college admissions officers is constrained by state and institutional rules that restrict their flexibility. Some officers’ open-ended responses, regardless of their political ideology, highlighted a role conflict in their daily practice. This conflict arose between their desire to help undocumented youth enroll in their colleges and benefit from ISRT and the demands of state and institutional policies that may

discourage undocumented youth from applying to college. Illustrations of such sentiments include:

I feel so bad when I turn them away. They're already here, why make them miserable asking needless docs. The deeper issue should be preventing them from coming illegally in the first place. Admission officer in California #114

I see how uncomfortable students are when they first apply and they say they do not have a social. They are ashamed. Isn't that so sad that they want to better themselves and they are embarrassed? I only hope that somehow this is corrected and addressed. My heart aches for these students.

Admissions officer in Texas #93

Colleges have been making it more and more complex for undocumented students to enroll. If we can specify exactly what is needed from the students and try to make it as easy as possible I think we would have a better rate of success. Those students are overwhelmed and confuse with meaningless paperwork. Then discouraged and abandon their college plans. That is the biggest failure.

Admissions Officer in Washington (#86)

Investigating how SLBs' perceptions of target groups' deservingness are related to their support for administrative burdens is difficult. The findings here do not allow me to conclude that variations in support for admissions requirements are related to perceptions of the deservingness of undocumented youth. Additional theoretical and empirical work is needed to elucidate other possible characteristics of both undocumented applicants and admissions officers that could influence perceptions of deservingness and their relationships to administrative burdens surrounding ISRT policy implementation. Future scholarly work also should explore the role of organizational environmental constraints that influence SLBs.

College personnel, including admissions officers have discretion that may affect the experiences of undocumented youth and their access to ISRT when applying for college. Analyzing variables that may influence their perceptions and preferences is significant to better understanding how SLBs shape administrative burdens that influence policy outcomes. Even if state legislatures establish overall admissions and ISRT requirements for undocumented youth and institutions impose additional rules, ultimately the admissions officers' role in facilitating or making the process more difficult is crucial for this population. More scholarly work would help in better understanding how admissions officers interpret admissions requirements and ISRT and how they justify their discretion in managing burdens.

## **CHAPTER SIX**

### **CONCLUSIONS**

This dissertation has explored theoretical perspectives and empirical evidence to understand better whether and how administrative burdens, as experienced as learning, compliance, and psychological costs, might affect undocumented youth who sought to attend college access and who could benefit from paying lower tuition as state residents. In doing so, the study contributes to understanding of the factors associated with such burdens at the state and institutional levels as well as how those burdens impact undocumented youth. This chapter integrates empirical evidence from three lenses of ISRT policy implementation: admissions applications at the institutional level, undocumented students' reports of their experiences, and perceptions of college admissions officers about requirements surrounding ISRT. First, the chapter begins by summarizing the empirical findings and discussing their implications for public administration theory and practice. Second, it points out the limitations of the study. Finally, it proposes steps for further research.

### **EVIDENCE AND IMPLICATIONS FOR PUBLIC ADMINISTRATION**

Since 2001 when the first U.S. states began to enact in-state resident tuition (ISRT) for undocumented immigrants--seeking to extend higher education opportunities for such individuals--scholars and policymakers have examined the rationales for such policies and their impact on college enrollment and completion rates of undocumented youth. The availability of ISRT, which allows undocumented youth to pay tuition costs as a citizen and legal resident of a state, is the only real possibility that this population has to attain higher education. The reasons for enacting ISRT policies typically rely on narratives of deservingness as well as economic

arguments. For some policymakers, extending opportunities to undocumented youth is the duty of governments and society; these young people mostly have lived in the country since childhood, and they have benefited from free public elementary and secondary education. Thus, they “belong” since they have assimilated the American system's values, culture, and functionality. Moreover, since governments have invested public resources in educating them, it is inconsistent and inefficient not to extend educational opportunities in higher education, enhancing their social mobility and their potential economic and social contributions to their communities and the country.

On the other hand, contending views favor prohibiting, limiting or revoking ISRT for undocumented youth. Such advocates rely on legal reasons, values rooted in fairness, and perceptions of non-deservingness. Legally, some policymakers believe state ISRT policies applying to undocumented students are inconsistent with federal law, maintaining that states cannot grant higher education public benefits to undocumented immigrants if citizens or legal residents of other states cannot access them.<sup>41</sup> Opponents also question whether it is right or fair to subsidize higher education for individuals who have entered and remain in the country in violation of federal law. Furthermore, such "aliens" do not “belong” in the country.

These competing views have influenced state policies on the availability of ISRT and how it is implemented. Even so, although a state's political leanings may be related to enactment of ISRT laws, partisanship evidently is not decisive in whether ISRT is available for undocumented youth. Democrats tend to favor ISRT policies for such a population, but also Republicans have led and supported the initiative in states such as Utah. The political subculture

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<sup>41</sup> See 1996 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA), Section 505.

in an area may be more likely to affect the availability of ISRT and the environment surrounding its implementation. In states and regions with prevalent moralistic political subcultures, requirements and rules seem designed to integrate undocumented populations into their institutions.

Most discussion of ISRT policy has focused on the rationale for and the legality of in-state resident tuition for undocumented immigrants instead of on policy implementation at the institutional level. Most studies have found that the availability of ISRT is not enough to increase enrollment rates of undocumented youth (Amuedo-Dorantes 2014; Florez 2010). Along with financial barriers, other factors linked to implementing ISRT policy may be relevant to the low enrollment of undocumented youth in colleges and universities. This study generally supports this expectation: administrative procedures and rules established when undocumented students claim ISRT benefits appear to be far from transparent or equitable.

The findings of this study generally support other research that has found inconsistencies between the design and implementation of ISRT at the institutional level (Nienhuser 2014; 2018). The ambiguity of ISRT policy and the general absence of guidance about implementation leave considerable space administrative discretion--driven by organizational practices and political values--at the institutional level that may favor or disfavor the ability of undocumented immigrants to go to college.

### **State and Institutions Implementing ISRT Requirements**

As has been shown, states differ in the availability and stringency of ISRT policies for undocumented immigrants. In some states, public colleges and universities rely on state legislation to authorize ISRT for undocumented students; other public colleges and universities



rely on decisions by state attorneys general, state agencies, or individual institutions in granting ISRT. Furthermore, institutions play crucial roles as policymakers in shaping state laws and requirements. Public colleges and universities vary in admissions requirements and rules when undocumented youth apply and claim ISRT benefits.

The requirements for undocumented applicants to qualify for ISRT are relatively straightforward and similar across states and public higher education systems. Nevertheless, the availability of ISRT in some states and higher education institutions does not guarantee undocumented immigrants' access to state-funded colleges and universities. Distinct institutional admissions requirements and rules show how those who manage ISRT policy implementation may limit participation, despite the formal eligibility of undocumented immigrants.

Varying rules and bureaucratic procedures result in part from overlapping policies at different organizational levels, standardized institutional practices, the extent of administrative capacity, and inconsistent college staff knowledge about ISRT policy. Such these factors may constrain the ability of institutions and admissions officers to help undocumented immigrants to integrate in their institutions. College admissions officers perform tasks within the confines of federal, state, and institutional policies. As an admissions officer in Virginia commented: "These decisions are rarely made by the admission office. Unfortunately, the board of visitors, the state government, AND the federal government make the rules we have to abide by." (#73).

Nonetheless, some states (e.g., California, New York, Utah, Washington) and individual educational institutions have made multiple efforts to buffer inter-organizational rules and ease institutional admissions requirements that could discourage undocumented applicants from going to college. In those states, meeting general requirements, such as graduating from a state high school and residing in the state, suffices for admissions and qualification for in-state tuition rates.

Yet other states and institutions have established stringent requirements and rules that may hamper college access.

Based on examination of application forms from individual colleges, this study finds that requirements such as providing evidence of residency and shortcomings like unclear instructions and lack of admissions staff designated to serve undocumented students appear to be important to decisions by undocumented youth about whether to apply to college. Analysis at the organizational level showed that only 40% of colleges provide information about ISRT policy and requirements on their websites. In addition, only 30% of admissions officers perceive the information provided on their college websites about ISRT to be helpful. Similarly, 60% of the undocumented survey participants reported not finding accurate and timely information about ISRT policies and requirements on institutional websites, and 17 of the interview respondents complained about the lack of information and guidance from colleges and admissions officers.

Variation of ISRT policies requirements between and within states and across institutions may reflect how state political actors socially construct undocumented immigrants. Restrictive policy environments and narratives of deservingness --at the national, state, and local levels-- may influence the availability and the institutional rules established to benefit from ISRT.

### **Deservingness Based on Belonging to a State/Locality**

Public administration scholars have highlighted the relationship between administrative burdens and perceptions of the deservingness of target groups (Baekgaard, Moynihan, and Thomsen 2021; Bell et al. 2020; Mettler 1998; Schneider and Ingram 1993, 1997; Sidney 2003). Bureaucratic procedures and rules may respond to political purposes by limiting access to public benefits that are in high demand and politically off-limits to groups considered undeserving

(Herd and Moynihan 2018; Soss et al., 2011). The requirements imposed on a target group to access public benefits frequently are subtle, but they may be more effective than enacting legislation or designing policies that explicitly limit participation and access. Indeed, most scholarly discussion of policy implementation revolves around policy eligibility criteria. Still, details such as the amount of documentation and paperwork requested of particular target groups are often overlooked. Yet, these details are meaningful and may convey diverse political values and leanings. Furthermore, political actors, including SLBs, may shape burdens and make deliberate decisions by weighing perceptions of deservingness.

A social construction of deservingness is not questioned for undocumented children since federal laws as the Supreme Court in *Plyler v. Doe* (1982) ruled access to public education regardless of their unlawful status. Their access does not go through high scrutiny, the provision of documents, or some demonstration of “entitlement.” However, the social and political context for undocumented youth abruptly shifts when they graduate from high school. Undocumented youth encounter restrictive policies in both applying to college and entering the job market (Gonzales, 2011). Particularly when facing the college application process, many confront their unlawful status for the first time. Further, their deservingness and sense of belonging are questioned. Undocumented youth realize that they are socially differentiated from citizens and legal residents through this official encounter with public organizations such as colleges and universities and the availability or absence of policies directed towards them. Gonzales (2011, 605) notes: “For undocumented youth, the transition into adulthood is accompanied by a transition into illegality that sets them apart from their peers.” Feeling excluded and not belonging is inevitable. A sense of belonging influences an individual’s behavior, social and state-administrative interactions, political participation, and civic engagement (Schildkraut et al.,

2018). A sense of belongingness exists beyond legal definitions of citizen or noncitizen. A sense of belonging implies an "emotional attachment" to the country and its institutions.

The perception of deservingness and its impact on an undocumented youth's inclusion and sense of belonging is not only determined by national or state law. Higher education institutions and their bureaucratic practices also mediate deservingness and belongingness. State agencies, higher education institutions, and admissions officers serve as "arbitrators" of deservingness. They ultimately are the ones that decide how and who enters their institutions. Belongingness intersects with race and legal status and shapes immigrants' identities and role in an area (Nelson and Hiemstra, 2008); it is closely associated with a sense of reception and integration (Mallet-García and García-Bedolla 2021). Thus, belongingness reflects both an individual's feelings of membership in a state or locality as well as the acknowledgment from society that the individual belongs (Huddy, Mason and Aarøe 2015).

The overall design of ISRT policies is tied to broad requirements of time spent living, studying, and finishing secondary school in a state. Additional requirements established in some states and institutions imply criteria of belonging, membership, and contribution to the country and the state. For instance, some states and institutions request government identification numbers, driver licenses, vehicle registration, and income tax forms from undocumented applicants and their parents. Meeting requirements imply that undocumented applicants must demonstrate that they belong and therefore deserve ISRT benefits because they have been socially involved and at least minimally acculturated to the American system. The college admissions requirements and documentation that undocumented students must meet are the evidence through which they demonstrate their belonging and "right" to be included in the state

and country. Coutin (2000) suggests that some documents that immigrants must provide indicate whether people "deserve" to be included in civic life.

### **Experiences of Undocumented Youth**

Undocumented students face multiple administrative burdens as a function of their unlawful status. While undocumented youth assume the consequences of their unlawful status in other areas (e.g., health coverage, driver licenses, work opportunities) (Gonzales 2011, 603-609), the administrative burdens related to attending college access highlight their status, influence their senses of belonging, and may determine their access, social mobility, and inclusion in society. For many, the college application process is their first direct encounter with the administrative state. It is an experience that undocumented students describe using terms like debilitating, full of red tape, frustrating, stressful, unfair, and excluding. Government bureaucracies "are emotive dimensions where documents are capable of carrying, containing, or inciting affective energies when transacted of social relation" (Navaro-Yashin; 2007, 81).

The experiences of undocumented students who face administrative burdens are related to factors linked with state policies, institutional rules at different organizational levels, and the discretion of admissions officers. Both administrative rules and the attitudes of admissions officers can facilitate or obstruct college access and qualification for ISRT. The circumstances of undocumented youth vary, with many reflecting their status as first-generation college students in families with high poverty rates who may lack social and cultural capital. In order to qualify for ISRT, most also confront daunting institutional rules and additional requirements that their counterparts do not. This exacerbates their feelings of exclusion. Similarly, admissions officers' comments underscore that undocumented youth face an application process designed for citizens

and legal residents, despite compliance with the requirements of ISRT legislation. Some admissions officers noted the fear the applicants experienced. As one elaborated:

I think when a process or requirements are formatted to one particular population, too much opportunity for further segmentation of that particular student population can occur. Even in our current system where undocumented students provide a notarized affidavit to qualify for in state residency for tuition purposes, those students and their families often experience concern or confusion since the reason they have to complete that additional form is because they are undocumented (potentially feeling singled out or worried about possible implications associated with being identified as having submitted that form).

Admissions officer in a four-year university in Texas #147

On its face, the admissions process appears fair--all applicants complete the "same" form. Yet the undocumented participants in this study routinely pointed out that meeting requirements for ISRT turned into a burdensome experience due to their unlawful status. Policies or procedures that seem neutral may have unequal impacts on various target groups (Peeters 2020; Ray, Herd and Moynihan 2020), which may reinforce social inequalities.

The findings from interviews and surveys with both undocumented participants and admissions officers also suggest the significance of the amplified psychological costs that some target groups experience when applying for public benefits and interacting with the administrative state. Although psychological costs are complex to measure and demonstrate, they may be the most relevant (compared to learning and compliance costs) in shaping individual behavior and interaction with the state when accessing public benefits. Further, how some target groups may be more affected by stigma and fear when applying is significant for public administration theory and practice. Fear can result in not interacting with the administrative state and depriving oneself of involvement in any space for participation. In the case of target

populations such as undocumented students, their unlawful status may amplify psychological, learning, and compliance costs. For undocumented students, it is not only applying for a public benefit that may turn onerous; applying itself also has a very high psychological cost. The psychological costs that result from interacting with the administrative state's power is an area that deserves more attention in public administration scholarship.

### **Perceptions of Admissions Officers**

College and university admissions officers work in a changing policy environment surrounding ISRT. As has been noted, although admissions officers have varying amounts of discretion to validate documentation and accept undocumented applicants, their administrative power is bounded by state policies and institutional rules that may overlap or be inconsistent when undocumented youth apply. An admission officer noted:

My office doesn't have consensus on how to handle undocumented students. As such, functionally, it is difficult to advise students on the process. It is almost as if we have a don't ask don't tell policy. A student could complete the application without notifying us that they were undocumented. Our residency is often based on the address of the application or high school. However, if a student selects that they are not a U.S. citizen on the drop down, then it gets tricky. I have asked for clarification for what to do multiple times and have been told just to pass the student to a higher up. It is kind of mysterious what actually happens. But, functionally, I don't know if the student would be eligible for in-state tuition and financial aid, so could many attend? I am not sure.

Four-year college, Admissions Officer in Oregon (#10)

Despite administrative constraints on admissions officers, their attitudes, actions and inactions can be crucial in affecting the behavior of undocumented applicants and in identifying mechanisms and options that facilitate or hamper their access. Indeed, policy ambiguity and overlapping rules may make room for greater administrative discretion that may favor or

disfavor undocumented immigrants. As the interviews with undocumented youth and the comments of admissions officers' suggested, admissions officers who support greater access to higher education undocumented applicants may be more cooperative, capitalizing on political ambiguity in the immigrants' favor.

The factors that drive SLBs like admissions officers to be more empathetic in facilitating participation and access to public benefits remains an area that deserves additional research. Such tendencies appear likely to reflect individual values and personality traits, which are challenging to investigate empirically. In this study, variables such as the race/ethnicity and political ideology of admissions officers, the types of institution in which they work, their perceptions of deservingness, and the extent of interaction with undocumented students are associated with their support for requirements when applicants claim in-state tuition. Such factors, however, appeared insufficient to frame admissions officers' decisions fully.

Although the political ideology of an individual can be important in understanding their attitudes and behavior, it rarely determines actions or inactions. For instance, this study finds that more conservative admissions officers are *not* less likely to support extending educational opportunities to undocumented immigrants than their more liberal counterparts.<sup>42</sup> However, the results do suggest that more conservative admissions officers are more likely to support more administrative requirements to qualify for ISRT. Yet, their assessments and comments may reflect adherence to rules instead of desire to hamper the educational opportunities of this population. Indeed, their comments do not reflect perceptions of the undeservingness of undocumented students; rather, they underscore strong values associated with efficiency,

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<sup>42</sup> It should be emphasized, though, that such results may be a function of the limited proportion of admissions officers who described themselves as conservative.



fairness, and merit in order to access higher education. Then, one might expect that such admissions officers are influenced by values rooted in legitimacy that push them to reject decisions that go beyond institutional rules.

### **Administrative Burdens as Consequential**

Administrative burdens respond to systemic factors of policy implementation. Although administrative burdens have been studied through the examination of interactions between entitled citizens/individuals and the administrative state, the causes and consequences of the burdens are related to the broader social and administrative context that surrounds policy implementation. As ISRT policy for undocumented students indicates, applicants' characteristics and contexts, a conflictual debate about the deservingness of undocumented youth, policy vagueness at the federal and state levels, and sometimes arbitrary institutional rules may exacerbate administrative burdens and hamper the agency of undocumented youth and their receipt of benefits.

Although administrative burdens may be unintentional, resulting from benign negligence or the consequences of coping mechanisms by overloaded street-level bureaucrats, who should interpret multiple rules and do their job within dysfunctional structures, such burdens lead to unintended consequences (Peeters 2020). Ultimately, burdens are a fundamental default in organizational structures and daily bureaucratic practices (Herd and Moynihan 2018; Chudnovsky and Peeters 2021). Further, the claimants are those who assume the consequences of these burdens, while organizational practices remain unquestioned and without accountability (Herd and Moynihan 2018; Chudnovsky and Peeters 2021).

Both the reports of undocumented participants and the comments of some admissions officers suggest that even if some burdens are accidental and unintentional, their consequences are not. They tend to affect disproportionately undocumented youth seeking higher education. Because of administrative burdens, some undocumented participants complain about giving up or postponing their educational plans, experiencing extreme fear and anxiety for themselves and their families, assuming additional monetary costs (e.g., having to pay out-state tuition for a time, extra costs to gather documentation), having to comply with procedures that represent higher opportunities costs, and experiencing discriminatory and demeaning treatment when applying. Similarly, some admissions officers noted the negative effect of institutions actions or inactions.

Every institution should make it clear that legal residency does not have to be what stops you from coming to college. I have experiences with undocumented students who were able to enroll in higher education and complete their degree, who had no idea this was a possibility because no one ever told them.

Admissions officer #36

Moreover, many of these burdens could be avoided if organizations evaluated how their practices affect participation in public benefits. Scholars argue that some disadvantaged groups enroll in public benefits at lower rates than would be predicted by their socioeconomic need, often because of onerous and demeaning processes of demonstrating eligibility (Campbell 2005; Soss, 1999; Herd and Moynihan 2018). For undocumented youth, it is not a matter of normalizing that administrative burdens affect them negatively when they apply for college and claim ISRT benefits. Instead, it is necessary to identify the roots of the burdens and track the chain of actions and inactions from higher education institutions. Administrative burdens scholarship has illuminated the importance of considering formal and informal organizational

practices that may discourage access to benefits and produce systematic patterns of administrative exclusion (Brodkin and Majmundar 2010, 844).

This study highlights the distributive impact of burdens on individuals entitled to ISRT. The burdens associated with applying to college and qualifying for ISRT do not affect all applicants (e.g., citizens, legal residents); many undocumented applicants were at a disadvantage and more likely to suffer administrative exclusion since they do not meet the "standard requirements" to access public benefits (Brodkin and Majmundar, 2010: 828). Procedures and rules that appear neutral may have unequal impacts on different target groups (Hattke 2020; Herd and Moynihan 2018; Rose 2021). Such administrative burdens can result in less participation in and negative experiences with targeted public policies or programs (Barnes and Henly, 2018). The factors involved in the unequal effects of administrative burdens suggest the importance of exploring more systemic vulnerabilities and inequalities when individuals claim public benefits.

Rules imposed at the organizational level have historically been used to normalize and reproduce social inequalities in the rhetorical discourse of the public sphere as being fair and guaranteeing equal treatment. Ray, Herd, and Moynihan (forthcoming 2021, p.1) note: "Racialized burdens are the experience of learning, compliance, and psychological costs, which serve as tools to reinforce racial inequality; they are the handmaidens of the racialized state." Further, Diaz-Strong et al. (2011, 108) comment: "Denying access to higher education has historically been a strategy to further disenfranchise vulnerable communities." Admissions requirements then may become arbitrary and meaningless, overlooking the higher education civic purpose (Long and Riley 2007). An admissions officer recognizes how practices and the language used in their institutional application processes may affect undocumented youth:

From my experience they seem to have a difficult time navigated the admission process or are fearful they will be reported to immigration. Honestly, we in part contribute to it. From the college perspective, it only takes us a few additional forms to assist these students..., [but] they become frustrated by the process or fearful to even start the process. The climate surrounding immigration policies and the use of certain terms (ex: illegal aliens) leads to many prospective students feeling stigmatized and keeping them from pursuing higher education.

Admissions officer in Texas #85

Admissions officers play crucial roles in influencing undocumented youth behavior and choices. The SLBs have both information and social capital to help undocumented youth to navigate the admissions process, locate resources, and connect them with other offices to assist in qualifying for ISRT and other aid. Instead of undocumented students having to navigate alone, learning about and applying to college can shift substantially with assistance from college staff. In interviews, undocumented participants highlighted how their applications succeeded when they received assistance from admissions officers. As an admissions officer elaborated:

In my experience, it isn't so much the rules or requirements that make as much as an impact on undocumented students being able to navigate the admissions process as so much as issues with information and support being provided in a way that is helpful to undocumented students..., but I think knowing where to start or how to navigate the admission process is challenging - especially for many of our undocumented students who often are first generation students. Improvements to information availability, communication and support are always needed to ensure undocumented students are able to navigate the admissions and enrollment process.

Admissions officer in Texas #147

Although this study does not offer systematically evaluate access to higher education for undocumented students, the results suggest that equity should be an embedded value in the

polycymaking process. In order to provide equal opportunities, political actors, including those who implement policy, should pay greater attention to individuals who, due to adverse socioeconomic and political circumstances, may lack the cultural and social capital to cope with many of the burdens they face. Teixeira et al. (2017) contend that higher education policies that aim to extend coverage should provide grants and loans to students while also adopting administrative procedures that prevent exclusion, particularly for those who traditionally have struggled to access higher education. How state governments and academic institutions address equity and inclusiveness in community college admissions for undocumented individuals is evidently critical to ISRT policy outcomes.

If the value of equity is a principle that drives public administration practice, then more systematic efforts must be made to consider the particular conditions and contexts of individuals who need public benefits. If public community colleges and universities seek to respond to the needs and circumstances of undocumented youth, they should reexamine rules addressing persistent educational inequities (Felix and Ramirez 2020).

### **Requirements and Bureaucratic Procedures Mediate Immigration Status**

Undocumented immigrants' integration into the U.S. at the national and subnational levels is shaped not only by law, but also by social membership. Inclusion may be seen as embedded in providing access to public programs establishing criteria of membership (Hochschild, Chattopadhyay, and Jones-Correa 2013). Therefore, policies such as ISRT shape the membership of undocumented youth and influence a sense of belongingness and inclusion.

Connotations surrounding being undocumented in the United States are influenced by prevailing social constructions and policies that vary among states, localities, and institutions.

ISRT eligibility requirements and institutional rules differ and likely produce different experiences of unlawfulness. As noted previously, some states and institutions try to ease rules and support access to and integration of undocumented youth in their institutions of higher education. Other states and institutions implement requirements and rules that appear more onerous and may marginalize and exclude this target group. Further, the latter send explicit messages of "undeservingness" and "non-belonging." Thus, the status of being undocumented results in differing senses of belongingness and in "categories" of membership.

**It is one thing to be an undocumented youth in California, Washington, or New York, and another to be an undocumented youth in Texas, Florida, or Nebraska. In the former, being undocumented typically does not limit integration and access to ISRT benefits and other financial aid available to citizens and legal residents. In the latter states, being undocumented often results in exclusion and being seen as an outsider who is unworthy to receive public benefits, even though ISRT is available. The differences in admissions requirements result in a variety of inclusion standards and differing levels of civic membership among states and localities. Mettler and Soss (2004) identify a similar phenomenon affecting U.S. citizens, suggesting how governmental action and inaction shape different categories of citizenships and thus memberships for individuals. Then, an individual's roles, rights, civic engagement, political participation, policy priorities, and problems reflect their spatial locations and constructions rather than their rights as individuals.**

Variation in state ISRT policies and institutional rules has significant implications for public administration and policy. Such policies and rules are intertwined, and they implicitly shape the status of undocumented youth at the national level. States and institutions indirectly make paths towards legality, facilitating or restricting the participation of this population in their institutions and in the integration in society. In doing so, states and institutions mediate intergovernmental tensions surrounding the legalization and inclusion of undocumented youth.

## RECOMMENDATIONS

Administrative burdens should be reduced at the institutional level. For instance, extending training for high school counselors and college officials, having more diverse admissions officers, reviewing application forms and information technology platforms where applications are carried out. Furthermore, it is needed to examine and adjust admissions processes when the ISRT policy is implemented, considering the participation of undocumented students.

Policy design and implementation changes often take place at the meso and macro levels. However, those who implement the policy and those affected by it are the main actors in any implementation process that demands transformation and adjustments. College administrators and personnel should strive to make a difference in the undocumented immigrants seeking higher education access. That achievement cannot be accomplished without the active participation of undocumented immigrants in the process. It may be necessary to do many experimental studies of application designs, admissions processes, and examination of documentation and other paperwork that would allow identifying less burdensome processes for such a population. A collaborative process is needed and is part of professional responsibility and ethical duty for college personnel. This duty is perhaps best expressed by illuminating the challenges that undocumented participants reported encountering, both individually and collectively. Future interventions should include a representative group of undocumented immigrants that feels empowered and supported despite administrative burdens when navigating the admissions process.

Among many of the short-term actions that evidently would affect impact the likelihood that undocumented youth apply to college is *institutional* communication that ISRT is available.

The communication should be accompanied by systematic tracking of information provision and procedures at the state and inter-organizational levels. When college administrators and other personnel change some institutional admissions and financial aid policies that may become administrative burdens, they certainly reflect a clear commitment to extend educational opportunities to undocumented immigrants.

Furthermore, it is crucial to develop empirical research about undocumented students' perceptions that allows comparing different approaches to policy implementation to identify potential learning, compliance, and psychological burdens. Indeed, in a wide range of current research in public administration, experimental studies seek to examine policy designs that simplify requirements and fields of information on application forms and that respond positively to the behavior of individuals who are eligible for public benefits. In such research, the inclusion of undocumented students is crucial to enhance ISRT policy outcomes. This type of research may result in adjustments and improvements to reduce the administrative burdens that undocumented students face. In doing so, the public administration theory and practice can move beyond expressing the importance of concepts such as "equity and inclusion" as mere buzzwords.

## **LIMITATIONS**

The general findings of the three manuscripts offer numerous insights into the experiences of undocumented youth who are legally eligible for in-state resident tuition but who face varying learning, compliance, and psychological costs. They point to numerous avenues for further research.



Yet these findings are not statistically generalizable. First, the sizes of the survey (136 undocumented students, 216 admissions officers) and interview (19) samples were small. More importantly, respondents were not representative of the undocumented youth or the college admissions officers in the states and public institutions that provide ISRT for undocumented students. The interview and undocumented survey respondents came mostly from California and Texas. Undocumented youth in different locations (e.g., Arizona, Connecticut, Florida, Nebraska, New Mexico, New York, Connecticut) may well have different insights and perceptions about racialized and politicized experiences. The participants also are mostly Hispanic students, with only two respondents from Canada and Vietnam / France). Clearly this limits examination of experiences from backgrounds, for instance, undocumented immigrants from Asian, African, or eastern European countries.

Similarly, higher response rates from admissions officers located in Texas, California, and Washington and lower ones from other states also may skew the results. Greater participation by admissions officers who describe themselves as at least “slightly” politically liberal compared to those describing themselves as “conservative” and “slightly conservative” may have some effect. Together, this may have resulted in not including the insights and perceptions of burdens from SLBs in other contexts and locations.

Finally, the examination of institutional application forms to tap administrative burdens (Chapter Three) was limited to community colleges, since they tend to be open-access institutions and because those institutions are the primary places that undocumented youth at least begin postsecondary education. Examination of applications for four-year colleges and universities may result in different findings, reflecting distinct requirements and organizational practices that influence administrative burdens. However, interviews with and surveys of

students attending four-year institutions as well as admissions officers who work in such institutions yielded similar reports about administrative burdens that result in exclusion.

## **FUTURE RESEARCH**

The role of college administrators and admissions officers in implementing ISRT for undocumented immigrants remains a significant area to explore (Nienhusser and Dougherty 2010). Although scholarly attention to the impact of administrative burdens on individual participation in public benefits has grown, greater focus needs to be placed on the nature and variation of administrative burdens at the organizational level. Further research at this level might explore the rationales behind decisions by individual states and public colleges and universities that affect access for undocumented immigrants and determine ISRT eligibility. Central concerns also include fuller understanding how states frame higher educational policies for undocumented students and how and why institutions create certain bureaucratic procedures when implementing policy.

Better understanding of how higher education institutions implement ISRT policies could significantly impact opportunities for undocumented youth. Scholars and practitioners in public administration and higher education policy should both identify mechanisms that reveal patterns of administrative exclusion and devise ways of responding. Including contextual factors is significant when examining complexities inherent in implementing higher education policies (Felix and Ramirez, 2020).

Administrative practices frequently result in normalizing and reinforcing, rather than compensating for, structural and growing inequalities among diverse groups in the allocation of public benefits in the United States (Jacobs and Soss 2010; Herd and

Moynihan 2018). Future studies then should investigate distinctions between reasonable and unreasonable burdens (Moynihan et al. 2015) that higher education institutions have established as well as the relationships between the features of policy implementers and the burdens they impose.

The reluctance of some higher education institutions to act in ways that expand and enhance the opportunities of undocumented young people to go to college access likely perpetuates inequity. Limiting the access of undocumented youth due to institutional practices, not existing law or individual choice, is a form of administrative exclusion. Future research might examine the actions and mechanisms that mediate institutional rules for compliance with state ISRT policy and recognition of the distinctive circumstances of undocumented youth.

The experience of coping with administrative burdens experience is affected by individual, contextual, and organizational factors. Scholars should systematically explore and compare the causes and consequences of administrative exclusion that undocumented youth face when meeting college requirements. In doing so, it will be important to expand the range of states, the race and ethnicity of undocumented youth, and the locations and types of institutions included. This would allow further identification of possible patterns and permit additional examination of the effects of exclusion that reproduce structural social inequalities.

The behavior of SLBs is always important to investigate since they play crucial roles in implementing and ultimately in shaping policies. Future research might look for characteristics of SLBs in higher education settings (e.g., admissions and financial officers), besides their political ideology, policy support, and perception of deservingness of target groups. Although those factors undoubtedly are important, others related to individual traits, such as personality,

religious values, and life experience, could help in understanding SLBs' attitudes and behavior in shaping burdens and making decisions.

The economic and psychological rationales that influence individual behavior when claiming public benefits are also important areas to investigate. Understanding why similar administrative rules affect individuals differently is an ongoing concern in public administration (Chudnovsky and Peeters 2020; Herd and Moynihan 2018). Investigating the motivations and actions of undocumented youth when they try to qualify for ISRT may illuminate policymakers' understanding of the nature of burdens and the “right” policies that need to be implemented. Public resources might be used more effectively and fairly if policymakers considered diverse factors that shape individual behavior. Furthermore, better understanding the behavior of undocumented youth might shape policy outcomes and allocate resources to those that would most benefit.

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**APPENDICES**

**APPENDIX A.**

**IN-STATE TUITION AND FINANCIAL AID FOR UNDOCUMENTED IMMIGRANTS BY STATE AND YEAR (NCSL 2021)**

<b>“State</b>	<b>In-State Tuition</b>	<b>Effective Year</b>	<b>Requirements</b>	<b>Financial Aid</b>	<b>Effective Year</b>	<b>Requirements</b>
California	AB 540	2001	<ul style="list-style-type: none"> <li>• Have attended a California high school for at least three (3) academic years.</li> <li>• Have graduated from a high school in California or attained a GED.</li> <li>• Have filled an affidavit with the institution stating that the student has applied for lawful immigration status if required by the individual institution.</li> </ul>	AB 131	2011	California DREAM Loan Program (SB 1210)
Texas	HB 1403	2001	<ul style="list-style-type: none"> <li>• Have graduated from a public or private high school or received the equivalent of a high school diploma in Texas.</li> <li>• Have resided in Texas for at least three (3) years as of the date the person graduated from high school.</li> <li>• Have registered at an institution of higher education not earlier than the 2001 fall semester.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	HB 1403	2001	Same ISRT requirements

Utah	HB 144	2002	<ul style="list-style-type: none"> <li>• Have attended a Utah high school for at least three (3) academic years.</li> <li>• Have graduated from a high school in Utah or received the equivalent (GED) before the start of the school term.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	SB 253	2015	<p>Access to privately-funded scholarships administered by public universities, regardless of immigration status.</p>
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New York	S.B.7784	2002	<ul style="list-style-type: none"> <li>• Have attended a New York high school for at least two (2) academic years.</li> <li>• Have graduated from a high school in New York or attained a GED.</li> <li>• Have applied for attendance at a higher education institution within five (5) years of receiving a diploma.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	A00782	2019	Same ISRT requirements
Washington	HB 1079	2003	<ul style="list-style-type: none"> <li>• Have graduated from a Washington high school or attained a GED.</li> <li>• Have resided in Washington for at least three (3) consecutive years as of the date the person received a diploma or GED.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	HB 1817, SB 6523, SB 6561	2013	Same ISRT requirements
Illinois	Public Act 093/	2003	<ul style="list-style-type: none"> <li>• Have graduated from an Illinois high school or attained a GED.</li> <li>• Have resided in Illinois for at least three (3) consecutive years after receiving a diploma or GED.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	HB 2691	2019	<ul style="list-style-type: none"> <li>• Have resided in Illinois for at least three (3) consecutive years as of the date the person received a diploma or GED. Continually lived in the state since receiving a diploma or GED.</li> <li>• Have filed an affidavit with the</li> </ul>

						institution stating that the student has filed an application for lawful immigration status, or will file such an application as soon as he or she is eligible to do so.
Kansas	HB 2145	2004	<ul style="list-style-type: none"> <li>• Have attended a Kansas high school for at least three (3) academic years.</li> <li>• Have graduated from a high school in Kansas or attained a GED.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> <li>• At the time of enrollment, the student is not eligible for resident tuition at a postsecondary school in another state.</li> </ul>			
New Mexico	SB 582	2005	<ul style="list-style-type: none"> <li>• Have attended a New Mexico high school for at least one (1) academic year.</li> <li>• Have graduated from high school or received their GED in the State of New Mexico.</li> </ul>	S.B. 582	2011	Same ISRT requirements

Nebraska	L.B. 239	2006	<ul style="list-style-type: none"> <li>• Have graduated from a public or private high school in Nebraska or attained a GED.</li> <li>• Have resided in Nebraska for at least three (3) years prior to high school graduation.</li> <li>• Have applied at an institution of higher education not earlier than the 2006 fall semester.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> <li>• Have lived with a parent or guardian while attending high school. If the parent ceases to reside in Nebraska, the student can retain resident status if the student fills out a form of intention to reside in Nebraska.</li> </ul>			
Maryland	S.B. 167	2011	<ul style="list-style-type: none"> <li>• Have attended a Maryland high school for at least three (3) academic years.</li> <li>• Have graduated from a Maryland high school or received a GED.</li> <li>• Have register at a Maryland community college within four (4) years of high school graduation or receiving a GED.</li> <li>• Have provided documentation that the student or the student's parent or legal guardian has filled out a Maryland income tax return annually for three (3) years the individual attended a high school in the state.</li> </ul>	SB 532, HB 420	2018	They must fill out the Maryland State Financial Aid Application.

- Have registered for selective service (Males 18-25 years old).

Colorado	S.B. 13-033	2013	<ul style="list-style-type: none"> <li>• Have attended a Colorado public or private high school, for at least three (3) academic years.</li> <li>• Have registered or already attended a public college or University in Colorado within twelve (12) months of graduating or completing a GED.</li> <li>• Have filled an affidavit stating the seeking of lawful residency</li> </ul>	H.B. 19-1196	2019	Each college/university in the State of Colorado manages funds differently and has different requirements for ASSET, DACA, and College Opportunity Fund.
New Jersey	S.2479	2013	<ul style="list-style-type: none"> <li>• Have attended a New Jersey high school for at least three (3) academic years.</li> <li>• Have graduated from a high school in New Jersey or received the equivalent of a high school diploma.</li> <li>• Have registered as an entering student or is currently enrolled in a public institution of higher education no earlier than Fall 2013.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>	SB 699	2018	<ul style="list-style-type: none"> <li>• Immigration Status. Student will file an affidavit to the college or University stating that the student has filed an application to legalize their lawful status or</li> </ul>

			<ul style="list-style-type: none"> <li>• Meets the DACA eligibility criteria and has submitted a request to USCIS to benefit from such program.</li> </ul>			will file an application when eligible.
Minnesota	SF 1236	2013	<ul style="list-style-type: none"> <li>• Have attended a Minnesota high school for at least three (3) academic years.</li> <li>• Have graduated from high school in Minnesota or attained a GED.</li> <li>• Provide selective service registration (Males 18-25 years old).</li> </ul>	SF 1236	2013	They must fill out the M.N. Dream Act application form and meet resident requirements.
Oregon	HB 2787	2013	<ul style="list-style-type: none"> <li>• Have attended an Oregon primary and high school, for at least three (3) academic years, prior to receiving a high school diploma or equivalent.</li> <li>• Have attended a primary and high school in the United States for at least five (5) academic years, before receiving a high school diploma or equivalent.</li> <li>• Have registered at public college or University in Oregon within three (3) years of earning a high school diploma or equivalent in Oregon.</li> <li>• Have demonstrated intention to become a</li> </ul>	SB 9932	2015	Same ISRT requirements



citizen or lawful permanent resident in the United States.

Florida H.B. 851 2014

- Have attended a Florida high school for three (3) consecutive years immediately prior to graduation. The applicant must submit an official Florida high school transcript(s) as evidence of attendance and graduation.
- Have registered at an institution of higher education within twenty-four (24) months of high school graduation. In addition, upon admissions to a Florida public higher education institution, students must submit a completed out-of-state/non-resident fee waiver form.
- Anyone who receives an out-of-state fee waiver is ineligible for state aid.

Connecticut HB 6844 2015

- Have attended a Connecticut high school for at least two (2) academic years.
- Have graduated from high school in Connecticut, or the equivalent thereof.

PA 18-2 2018

- Students should fill out a standardized application form (14 pages).

- The immunization record is mandatory but Medicaid or health assistance is not available for undocumented students.

Kentucky	13 KAR 2:4054	2015	<ul style="list-style-type: none"> <li>• Have graduated from a Kentucky high school or received a GED in the state.</li> <li>• Have attended high school in the Commonwealth for at least two (2) academic years.</li> </ul>
Virginia	H.B. 1547	2020	<ul style="list-style-type: none"> <li>• Have graduated on or after July 1, 2008, from a public or private high school or program of home instruction in the Commonwealth or, passed, on or after July 1, 2008, a high school equivalency examination approved by the Secretary of Education.</li> <li>• Have provided documentation that the student or the student's parent or legal guardian has filled out--unless exempted by state law income--Virginia income tax returns for at least two (2) years before the date of registration or enrollment.</li> </ul>

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Source: Author based on information from National Conference of State Legislatures 2021, selected years

**APPENDIX B.**  
**PUBLIC COLLEGES AND STATE UNIVERSITIES SYSTEMS OFFERING IN-STATE TUITION BY STATE AND YEAR**

State	In-State Tuition	Effective Year	Requirements	
1	Hawaii	U.H. Board of Regents Policies Ch 6, S 6-9	2013	<ul style="list-style-type: none"> <li>• Have attended a public or private high school in the United States for at least three (3) academic years, and graduated from or attained the equivalent of such from a U.S. high school.</li> <li>• Have established residency by being physically present in Hawaii for twelve 12 months (demonstrating intent to make Hawaii the place of permanent residency).</li> <li>• Have filled a request for Deferred Action for Childhood Arrivals from the United States Citizenship and Immigration Services (USCIS).</li> <li>• Have filled out an application for legal immigration status or an affidavit with the college/university confirming intent to seek lawful residency.</li> </ul>
2	Maine	U.M.S. Board of Trustees	2017	<ul style="list-style-type: none"> <li>• Have received temporary protections under federal programs for unauthorized students such as those with DACA status.</li> </ul>
3	Michigan	U.M. Board of Regents	2013	<ul style="list-style-type: none"> <li>• Have attended for at least three (3) years an accredited Michigan high school.</li> <li>• Have graduated from a Michigan high school, or obtained a Michigan (GED).</li> <li>• Will start their education at the university within forty (40) months of high school graduation or receipt of a</li> </ul>

				GED.
				<ul style="list-style-type: none"> <li>• Demonstrated permanent legal resident of the State of Michigan.</li> </ul>
4	Oklahoma	H 1804 Oklahoma State Regents for Higher Education Policy Manual Ch 3, S 17.6	2007	<ul style="list-style-type: none"> <li>• Have graduated from a public or private high school in Oklahoma.</li> <li>• Have resided in Oklahoma while attending high school classes for at least two (2) years before graduation.</li> <li>• Have secured admission to, and enrolled in, an institution within the Oklahoma state system of higher education.</li> <li>• Have provided to the institution a copy of an application or petition to the U.S. Citizenship and Immigration Services to legalize the student's status.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>
5	Rhode Island	S 5.0 Residency Policy	2011	<ul style="list-style-type: none"> <li>• Have attended a Rhode Island high school for at least three (3) academic years or more.</li> <li>• Have graduated from a Rhode Island high school or received a (GED) from the state.</li> <li>• Have filled an affidavit stating the seeking of lawful residency.</li> </ul>
6	Arizona	Prop 300	2006	<ul style="list-style-type: none"> <li>• This law states that undocumented students are not entitled to classification as in-state student or entitled to classification as a county resident.</li> </ul>

		S 492	2008	<ul style="list-style-type: none"> <li>• The University of Arizona allows undocumented students benefit from ISRT in the following cases: <ul style="list-style-type: none"> <li>• Who attended an Arizona high school for at least three 3 years.</li> <li>• Who graduated from an AZ high school or GED program.</li> <li>• Who have applied for DACA status.</li> </ul> </li> <li>• This law states that undocumented immigrants cannot be classified as in-state for tuition purposes unless the board of regents determines it.</li> </ul>
7	Georgia	State Board of Regents Policy Manual	2010	<ul style="list-style-type: none"> <li>• The State Board of Regents passed rules regulating the admission of certain undocumented students, particularly DACA students. The 35 institutions in the University System of Georgia must verify the lawful presence of all students seeking in-state tuition rates.</li> </ul>

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Source: Author based on information from National Conference of State Legislatures 2021, selected years

**APPENDIX C.**  
**STATES BARRING OR LIMITING IN-STATE TUITION BENEFITS FOR UNDOCUMENTED STUDENTS**  
**BY STATE AND YEAR**

State	In-State Tuition	Effective Year	Requirements	
1	Alabama	H 56	2011	<ul style="list-style-type: none"> <li>• This law bars undocumented students from enrolling in or attending any public postsecondary education institution in the State of Alabama. The law contends that an immigrant attending any public postsecondary education institution must either possess lawful permanent residence or an appropriate non-immigrant visa.</li> </ul>
2	Indiana	H 1402	2011	<ul style="list-style-type: none"> <li>• This law states that undocumented students are ineligible to pay the in-state tuition rate.</li> </ul>
		S 207	2013	<ul style="list-style-type: none"> <li>• This law amended existing regulation to exempt undocumented individuals who enrolled in a high school state on or before July 1, 2011.</li> </ul>
	Missouri	H 3	2015	<ul style="list-style-type: none"> <li>• This law prohibits providing funds to higher education institutions that grant in-state tuition rates to undocumented immigrants.</li> </ul>

2016 The law also bars scholarships to students without lawful immigration status.

3 H 2003

4 South Carolina H 4400 2008

• This law prohibits undocumented students from attending a public higher education institution. Educational institutions must verify lawful presence in the United States. The law also states that undocumented students are not eligible based on residence for public higher education benefits including, but not limited to, scholarships, financial aid, grants.

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Source: Author based on information from National Conference of State Legislatures 2021, selected years”

**APPENDIX D.**  
**SAMPLE OF COMMUNITY COLLEGES LOCATED IN STATES OFFERING IN-STATE TUTION**

No	State	Community College	City
1		Allan Hancock College	Santa Maria
2		American River College	Sacramento
3		Antelope Valley College	Lancaster
4		Bakersfield College	Bakersfield
5		Barstow Community College	Barstow
6		Berkeley City College	Berkeley
7		Butte College	Los Angeles
8		Cañada College	Redwood
9		Cerritos College	Norwalk
10		Cerro Coso Community College	Ridgecrest
11	California	City College of San Francisco	San Francisco
12		College of the Siskiyous	Weed
13		Cuesta College	San Luis
14		Cypress College	Cypress
15		De Anza College	Cupertino
16		Diablo Valley College	Pleasant Hill
17		Feather River Community College District	Plumas County
18		Glendale	Glendale
19		Golden West College	Huntington
20		Irvine Valley College	Irvine
21		Lake Tahoe Community College	South Lake Tahoe
22		Las Positas College	Livermore



23		Los Angeles City College	Los Angeles
24		Los Angeles Trade Technical College - LATTC	Los Angeles
25		Los Medanos College	Pittsburg
26		Mendocino	Ukiah
27		Mission College	Santa Clara
28		Moorpark College	Moorpark
29		Mt San Antonio College	Walnut
30		Napa Valley College	Napa
31		Ohlone	Fremont
32		Orange Coast College	Costa Mesa
33		Palo Verde College	Blythe
34		Pasadena City College	Pasadena
35		Porterville College	Porterville
36		San Bernardino Valley College	San Bernardino
37		Santa Barbara City College	Santa Barbara
38		Santa Rosa Junior College	Santa Rosa
39		Solano Community College	Fairfield
40		Taft College	Taft
41		Ventura College	Ventura
42		West Hills College-Coalinga	Coalinga
43		Aims Community College	Greeley
44		Arapahoe Community College	Littleton
45		Colorado Northwestern Community College	Rangely
46	Colorado	Community College of Aurora	Aurora
47		Community College of Denver	Denver
48		Front Range Community College	Westminster
49		Lamar Community College	Lamar

50		Morgan Community College	Fort Morgan
51		Pikes Peak Community College	Colorado Springs
52		Pueblo Community College	Pueblo
53		Red Rocks Community College	Lakewood
54		Trinidad State Junior College	Trinidad
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55		Asnuntuck Community College	Enfield
56		Capital Community College	Hartford
57		Gateway Community College	New Haven
58		Goodwin University	East Harford
59		Housatonic Community College	Bridgeport
60	Connecticut	Manchester Community College	Manchester
61		Middlesex Community College	Middletown
62		Naugatuck Valley Community College	Waterbury
63		Northwestern Connecticut Community College	
64		Quinebaug Valley Community College	Danielson
65		Three Rivers Community College	Norwich
66		Tunxis Community College	Farmington
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67		Broward College-Weston Center	Lauderdale
68		Chipola College	Chippola
69		College of Central Florida Ocala Campus	Ocala
70		Daytona State College	Daytona Beach
71		Eastern Florida State College	Cocoa
72	Florida	Florida Gateway College	Lake City
73		Florida State College at Jacksonville	Jacksonville
74		Gulf Coast State College	Panama City
75		Hillsborough Community College - Plant City Campus	Tampa
76		Indian River State College	Fort Pierce
77		Miami Dade College	Miami
78		North Florida College	Madison

79		Palm Beach State College	Lake Worth
80		Pasco-Hernando Community College	New Port Richy
81		Pensacola State College	Pensacola
82		Polk State College	Winter Haven
83		Santa Fe College	Gainesville
84		Seminole State College	Sandford
85		SPC - St. Petersburg/Gibbs Campus	Clear Water
86		Tallahassee Community College	Tallahassee
87		Valencia College	Orlando
88		Carl Sandburg College	Galesburg
89		College of DuPage	Glen Ellyn
90		College of Lake County	Grayslake
91		Danville Area Community Clg	Danville
92		Elgin Community College	Elgin
93		Frontier Community College (Illinois Eastern Community Colleges)	Fairfield
94		Harry S Truman College	Chicago
95		Highland Community College	Freeport
96		Illinois Central College - East Peoria	East Peoria
97	Illinois	Illinois Valley Community College	Oglesby
98		John A. Logan College	Carterville
99		Lincoln Land Community College	Springfield
100		Lincoln Trail College (Illinois Eastern Colleges)	Robinson
101		Malcolm X College	Chicago
102		McHenry County College	Crystal Lake
103		Moraine Valley Community College	Paolo Hills
104		Oakton Community College	Des Plaines
105		Olive-Harvey College	Chicago
106		Prairie State College	Chicago Heights
107		Richard J. Daley College	Chicago

108		Rockford Career College	Rockford
109		William Rainey Harper College	Palatine
110		Allen County Community College	Lola
111		Barton County Community College	Great Bend
112		Butler Community College	El Dorado
113		Central Christian College of Kansas	Mcperson
114		Cloud County Community College	Concordia
115		Coffeyville Community College	CoffeyVille
116	Kansas	Colby Community College	Colby
117		Cowley County Community College	Arkansas
118		Dodge City Community College	Dodge city
119		Fort Scott Community College	Fort Scott
120		Flint Hills Technical College	Emporia
121		Kansas City Kansas Community College	Kansas city
122		Neosho County Community College	Chanute
123		Pratt Community College	Pratt
124		Ashland Community and Technical College	Ashland
125		Bluegrass Community and Technical College	Lexington
126		Elizabethtown Community and Technical College	Elizabethtown
127	Kentucky	Hopkinsville Community College	Hopkinsville
128		Madisonville Community College (North Campus)	Madisonville
129		Maysville Community & Technical College	Maysville
130		Southcentral Kentucky Community & Technical College	Bowling Green

131		Southeast Kentucky Community and Technical College	Cumberland
132		Allegheny College of Maryland	Cumberland
133		Allegheny College of Maryland	Baltimore
134		Anne Arundel Community College	Arnold
135		Aveda Institute Maryland	Bel Air
136		Carroll Community College	Westminster
137	Maryland	Cecil College	North East
138		Chesapeake College	Wye Mills
139		College of Southern Maryland	La Plata
140		Frederick Community College	Frederick
141		Harford Community College	Bel Air
142		Prince George's Community College	Largo
143		Wor-Wic Community College	Salisbury
144		Alexandria Tech and Community College	Alexandria
145		Anoka College	Cambridge
146		Avalon School of Cosmetology	Worthington
147		Century College Minnesota	White Bear Lake
148		Hennepin Technical College	Brooklyn Park
149		Institute of Production and Recording	Minneapolis
150		Lake Superior College	Duluth
151	Minnesota	Leech Lake Tribal College	Cass Lake
152		Minnesota State Community and Technical College	Fergus Falls
153		Minnesota west community college	Mendota Heights
154		Pine Technical & Community College	Pine City
155		Rainy River Community College	International Falls
156		Riverland Community College	Austin
157		Rochester Community and Technical College	Rochester
158		Saint Paul College	Saint Paul

159		St Cloud Technical and Community College	Saint Cloud
160		White Earth Tribal and Community College	Mahnomen
161	Nebraska	Central Community College	Gran Island
162		Metropolitan Community College	Ohama
163		Mid Plains Community College	North Platte
164		Nebraska College of Technical Agriculture	Curtis
165		Nebraska Indian Community College	Macy
166		Southeast Community College	Lincoln
167	New Jersey	Atlantic Cape Community College	Mays Landing
168		Bergen Community College	Paramus
169		Brookdale Community College	Lindcroft
170		County College of Morris	Randolph
171		Essex County College	Newark
172		Hudson County Community College	Jersey city
173		Middlesex County College	Edison
174		Rowan College at Burlington County- Pemberton Campus	Mont Laurel
175		Rowan College of South Jersey Cumberland Campus	Vineland
176	New Mexico	Central New Mexico Community College	Albuquerque
177		Clovis Community College	Clovis
178		Luna Community College	Las Vegas
179		Mesalands Community College	Tucumcari
180		New Mexico Junior College	Hobbs
181		New Mexico Military Institute	Roswell
182		San Juan College	Farmington
183		Santa Fe Community College	Santa Fe
184	Southwestern Indian Polytechnic Institute	Albuquerque	
185	New York	American Academy McAllister Institute	New York
186		American Academy of Dramatic Arts	New York
187		ASA College	Brooklyn

188		Borough of Manhattan Community College	New York
189		Fashion Institute of Technology	New York
190		Guttman Community College	New York
191		Hostos Community College	Bronx
192		Kingsborough Community College	Brooklyn
193		LaGuardia Community College	Long Island
194		Nassau Community College	Garden city
195		Queensborough Community College	Bayside
196		Rockland Community College	Suffern
197		Suffolk County Community College	Selden
198		Westchester Community College	Valhalla
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199		Blue Mountain Community College	Pendleton
200		Central Oregon Community College	Ben
201		Clackamas Community College	Oregon city
202		Clatsop Community College	Astoria
203		Columbia Gorge Community College	The Dalles
204	Oregon	Lane Community College	Eugene
205		Mt. Hood Community College	Gresham
206		Oregon Coast Community College	Newport
207		Tillamook Bay Community College	Tillamook
208		Treasure Valley Community College	Ontario
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209		Alvin Community College	Alvin
210		Amarillo College	Amarillo
211		Angelina College	Lufkin
212		Austin Community College	Austin
213	Texas	Blinn College	Brenham
214		Central Texas College	Killeen
215		Cisco College	Cisco
216		Clarendon College	Clarendon

217		Coastal Bend College	Beeville
218		College of the Mainland	Texas
219		Collin College	McKinney
220		Dallas College Brookhaven Campus	Farmers Branch
221		Del Mar College	Corpus Christi
222		Frank Phillips College CA&I Building	Borger
223		Galveston College	Galveston
224		Grayson College	Denison
225		Howard College	Big Spring
226		Jacksonville College	Jacksonville
227		McLennan Community College	Waco
228		Northeast Texas Community College	Mount Pleasant
229		Northwest Vista College	San Antonio
230		Palo Alto College	San Antonio
231		Ranger College	Ranger
232		Remington College - Greenspoint Campus	Houston
233		San Jacinto College Central	Pasadena
234		Tarrant County College District Office	Fort Worth
235		Vernon College Student Center	Vernon
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236		Ameritech College of Healthcare	Draper
237		Broadview University - West Jordan	West Jordan
238		Davis Applied Technology College	Kaysville
239		Dixie State University	Saint
240	Utah	Eagle Gate College-Murray	Salt Lake city
241		Latter-Day Saints Business College	Salt Lake city
242		Mountainland Applied Technology College	Lehi
243		Salt Lake Community College	Salt Lake city
244		Snow College	Ephraim
245		Uintah Basin Applied Technology College	Roosevelt
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246		Blue Ridge Community College	Weyers Cave
247		Bryant & Stratton College	Virginia Beach
248		Central Virginia Community College	Lynchburg
249		Community college in Chesterfield County	Chesterfield
250		Reynolds Community College (Parham Campus)	Richmond
251		New River Community College	Dublin
252	Virginia	Northern Virginia Community College - Alexandria Campus	Alexandria
253		Northern Virginia Community College - Medical Education Campus	Annandale
254		Southwest Virginia Community College	Cedar Bluff
255		Virginia Western Community College	Roanoke
256		Bates Technical College: Downtown Campus	Tacoma
257		Belevue college	Tacoma
258		Bellevue College	Bellevue
259		Bellingham Technical College	Bellingham
260		Big Bend Community College	Moses Lake
261	Washington State	Cascadia College	Bothel
262		Centralia College	Centralia
263		Clark College	Vancouver
264		Clover Park Technical College	Lakewood
265		Edmonds Community College	Lynnwood
266		Grays Harbor College	Aberdeen

267	Green River College	Auburn
268	Highline College	Des Moines
269	Lower Columbia College	Longview
270	North Seattle College	Seattle
271	Pierce College Fort Steilacoom	Lakewood
272	Shoreline Community College	Shoreline
273	Spokane Community College	Spokane”

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**APPENDIX E.**  
**CODING OF ADMISSIONS REQUIREMENTS**

Coding administrative requirements: Administrative requirements such as application fee, Social Security Number, evidence of legal residency, tax forms or tax identification number, notarized affidavit, citizenship documentation (e.g. passport, visa), driver's license, parents' information, immunization records were coded as follows:

➤ **Application Fee:**

0- No application fee.

Fee is between:

1- \$0 and \$20USD

2- \$20 and \$40USD

3- Above \$40USD

➤ **Social Security Number (SSN):**

0- SSN not required

1- Required, but guidance to fill out the checkbox.

2- Required but no instructions for completing the checkbox.

3- Required and not possible to complete the online application without providing it.

# Screenshots Examples of SSN Coding:

0.

**ANOKA TECHNICAL COLLEGE** Anoka Technical College - College Connect Application

\*This application must be turned in at the same time as other admissions materials required for the College Connect Early Middle College program.

**Required Information (Please print clearly)**

Full Name: (Last, First, Middle) \_\_\_\_\_ Email: \_\_\_\_\_

Current Mailing Address: (House/Apt. Number, P.O. Box) \_\_\_\_\_ City: \_\_\_\_\_ State: MN Zip Code: \_\_\_\_\_

County you live in: \_\_\_\_\_ Length of Residency: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Current High School: \_\_\_\_\_ Expected Graduation Year: \_\_\_\_\_

\*Gender:  Male  Female \*Birthdate: \_\_\_\_\_

What term do you intend to start taking courses? (choose only one and indicate the year)  
 Fall Semester \_\_\_\_\_ Spring Semester \_\_\_\_\_

\*Gender and Birthdate is Confidential Information that is required by the Minnesota Department of Education.

**Request for Confidential Information (Optional)**

What is the highest level of education for your parent(s) guardian(s)?

Parent/Guardian #1:  No high school diploma  High School Diploma  Some College  Two-year college degree/diploma  Bachelor's degree or higher  Not sure/Don't know

Parent/Guardian #2:  No high school diploma  High School Diploma  Some College  Two-year college degree/diploma  Bachelor's degree or higher  Not sure/Don't know

Are you Hispanic or Latino (a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture, regardless of race)?  Yes  No

Racial background (select one or more)

American Indian or Alaska Native - A person having origins in any of the original peoples of North and South America (including Central America) who maintains cultural identification through tribal affiliation or community attachment.

Asian - A person having origins in any of the original people of the Far East, Southeast Asia or the Indian subcontinent.

Black or African American - A person having origins in any of the black racial groups of Africa.

Native Hawaiian or Other Pacific Islander - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White - A person having origins in any of the original peoples of Europe, the Middle East or North Africa.

I certify that the information provided on this application and all other admissions materials is complete, accurate, and true to the best of my knowledge.

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

[www.anokatech.edu](http://www.anokatech.edu)

Anoka Technical College is an affirmative action, equal opportunity employer and educator.

1.

**Personal Demographic Information**

Your response to the following will in no way affect your admission status. This information is requested in compliance with Federal Regulations.

Academic Plans

Education History

Residency Information

Submit Application

**Gender \***

**Birth Date \*** Please use this format: mm/dd/yyyy

**Social Security Number \***  
 While a SSN is not required for admission, it is used to match qualifications records and is required for education tax credit and most financial aid.  
 Please enter your Social Security Number as 9 numbers, with no dashes. If you do not have a SSN, please enter all nines in this box (999999999).

Are you a veteran, active duty service member, or military dependant?

2.

## PERSONAL INFORMATION

**LEGAL FIRST NAME \***

**LEGAL MIDDLE NAME**

**LEGAL LAST NAME \***

**MAIDEN NAME**

**DATE OF BIRTH \***

**SOCIAL SECURITY NUMBER**

**Your social security number is important for tax credit purposes \***

**EMAIL ADDRESS \***

3.

**Online Application** Privacy

**Personal - Social Security Number (SSN) and Date of Birth:**

Providing your SSN and Date of Birth is voluntary and failing to do so will have no effect on the processing or consideration of your application. This information is requested to help identify your record within the system and ensure that all of your data is matched together, including financial aid application information, if applicable. If you provide your SSN and Date of Birth, it will be used by school officials for positive identification, institutional research, and required state and federal reporting. It may also be used within the system for purposes such as system consumer and alumni relations and to create summary data about system programs through data matches with other state agencies.

**Incorrect SSN entered. Please re-enter.**

**Social Security Number** (The following formats are acceptable: 333-22-4444, 33322444)

Show Social Security Number

**Date of Birth**

(mm/dd/yyyy)

## ➤ Residency

0 = The form asks a simple question: if the individual live in the state, but they do not ask for proof of residency.

**Profile Tab: Residency Section**

Are you a New York State resident?  Yes  No

If yes, what is your New York State county of residence? \_\_\_\_\_

If yes, but for less than one year, how many months? \_\_\_\_\_

**Profile Tab: Demographics Section**

Does one or more of the following apply to you; you are or were in foster care at any time after the age of thirteen; you are an orphan who was not adopted before the age of thirteen?  Yes  No

Military/Veteran Status:  Active Duty Military  Dependent of Veteran  Veteran  
 National Guard or Active Reserve

Are you Hispanic/Latino?  Yes  No

If Hispanic/Latino, is your background:  Central American  Cuban  Dominican  Mexican  
 Puerto Rican  South American  Other

1 = The form asks for proof of residency. The form allows to provide different options.

### \*RESIDENCY STATUS:

*NOTE: Your residency status will not affect your admission to the College. It is used only to determine your tuition based on state and federal laws. For additional residency information, visit bartonccc.edu/prospective.*

Are you a U.S. citizen?  Yes  No If no, please provide Alien Registration Number \_\_\_\_\_

*\*Citizenship is used to determine tuition rate. Students must provide alien resident card or refer to "Non U.S. Citizens" procedures in the Kansas residency statement and request an affidavit if applicable.*

Student Visa  Permanent Resident  Other Visa  Other \_\_\_\_\_

If yes, are you a Kansas resident?  Yes  No

Date Kansas Residency Began: \_\_\_\_\_  
 Month/Day/Year

Legal County of Residence: \_\_\_\_\_ Date County Residency Began: \_\_\_\_\_  
 Month/Day/Year

### \*HIGH SCHOOL INFORMATION:

2 = They ask for residency and individuals must provide specific documentation.

Student Name: \_\_\_\_\_ EMPL ID# \_\_\_\_\_  
 Term: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

The State of Florida requires both immigration documents and residency documents to establish Florida residency for tuition purposes.

- **U.S. Immigration Documents**- Students and persons claiming residency if they are not US citizens.
- **Florida Residency Documents- Minimum of two Florida documents required** dated one year before the first day of the term. At least one of the documents submitted must be from the first group. Three documents required for reclassification.

**Dependent Status** - Students under 24 years  
**Independent Status** - Students age 24 and over. Students who claim to be "independent" and are under the age of 24 must provide documents supporting claim.

**ACCEPTED DOCUMENTS**  
 Picture ID Required

Person Claiming Florida Residency: \_\_\_\_\_ Student \_\_\_\_\_ Parent/Legal Guardian/Spouse \_\_\_\_\_

First Group	Second Group
<input type="checkbox"/> Florida ID or driver's license	<input type="checkbox"/> Utility bill and proof of 12 consecutive payments
<input type="checkbox"/> Florida vehicle registration	<input type="checkbox"/> Lease agreement and proof of 12 consecutive months of payment (receipts)
<input type="checkbox"/> Florida voter's registration card	<input type="checkbox"/> Florida professional or occupational license
<input type="checkbox"/> Florida Prepaid recipient card or letter	<input type="checkbox"/> Documents evidencing family ties in Florida
<input type="checkbox"/> Proof of permanent home in Florida (Homestead Exemption, warranty deed, or multiple years lease contracts)	<input type="checkbox"/> Florida incorporation
<input type="checkbox"/> Florida H.S. Transcripts for multiple years if Florida HS Diploma/GED was earned within the last 12 months	<input type="checkbox"/> Membership in FL-based charitable organizations
<input type="checkbox"/> Proof of full-time employment in Florida (at least 30 hours per week for a consecutive 12 month period)	<input type="checkbox"/> Declaration of domicile in Florida

➤ **Citizenship**

0= They ask for citizenship information, but they do not ask for documentation.

The screenshot shows a web form titled "Citizenship/Military". Under the heading "Citizenship & Immigration Status", there is a dropdown menu with the following options: "-- Select Status --", "U.S. Citizen", "Permanent Resident", "Temporary Resident / Amnest", "Refugee / Asylee", "Student Visa (F-1 or M-1)", and "Other".

1= They ask for citizenship information, and individuals must provide documentation.

The screenshot shows a web form with several fields:
 

- 5. County of Residence: \_\_\_\_\_
- 6. Email Address: \_\_\_\_\_
- 8. Primary Phone:  Cell  Home  Business
- 9. Other Phone:  Cell  Home  B
- 11. Citizenship: (Check as appropriate.)
  - U.S. Citizen  Permanent Resident/Asylee/Refugee (Must bring in original card.)
  - Non-U.S. Citizen (Must submit copy of immigration document.)
  - Visa Type \_\_\_\_\_
- 13. Race: Select one or more of the following categories (See definitions at left).

2= They ask for citizenship information, and individuals must provide information to continue with the process.

The screenshot shows a web form titled "Citizenship Information". It includes the following fields:
 

- \* Citizenship Status: [Dropdown]
- Permanent Resident Number: [Text]
- (The following is to be completed by VISA Holders only.)
- Visa Type: [Dropdown]
- Visa Issue Dates: [mm/dd/yyyy]
- Visa Expiration Dates: [mm/dd/yyyy]
- Military Service:
  - Are you an active-duty service member?  No  Yes
  - Are you a veteran of the U.S. Military?  No  Yes If Yes, did you serve on or after 09/11/2001?  No  Yes
  - Are you eligible to receive VA educational benefits as the spouse or dependent child of a veteran?  No  Yes

**Section A: CITIZENSHIP (Complete in black or blue ink.)**

Name of Student \_\_\_\_\_ Date of Birth \_\_\_\_\_

Student is a  U.S. Citizen  Non-U.S. Citizen  Permanent Resident  Other

Alien Registration Number \_\_\_\_\_ Issue Date \_\_\_\_\_ Visa Category \_\_\_\_\_

All non-U.S. citizen students seeking classification as a Florida resident for tuition purposes are required to submit documentation of their legal status in the U.S. as issued by the U.S. Citizenship and Immigration Services office.

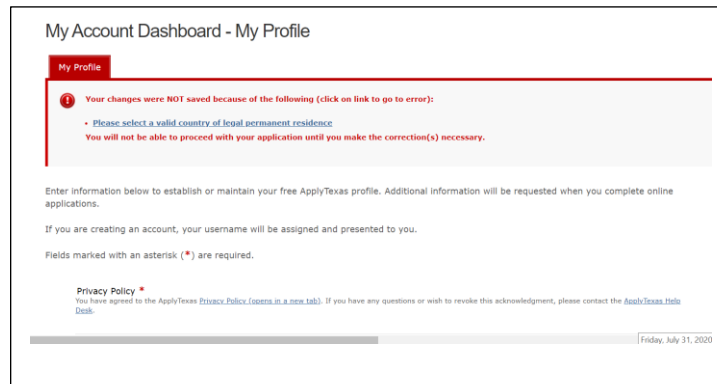
**NEXT - If you are a Non-Florida, Non-Alabama, or Non-Georgia Resident continue to Section B.**

**- If you are a resident of Florida, Alabama, or Georgia continue to Section C.**

➤ **Tax Forms:**

0 = Not required

1 = It is mandatory, and the system does not enable to continue the application.



➤ **Immunization Records**

0= Not required

1= Required

**Students must comply and return this completed document to the Admissions Office prior to registration.**

If you were born after December 31, 1956, Connecticut State Law requires that all full-time (degree seeking and non-degree/non-matriculating) and part-time matriculating students enrolled in postsecondary school be adequately protected against measles, mumps and rubella. In addition, beginning on August 1, 2001, all full-time and matriculating students degree those born in the operational 12 birth months prior to January 1, 1980, must provide proof of immunization against measles (black ink pen). Students must have two (2) doses of each vaccine administered at least one (1) month apart to insure adequate immunization.

**If you are not exempt, please complete one of the options below and attach the necessary documentation.**

Name of Student \_\_\_\_\_ SSN \_\_\_\_\_ Date of Birth \_\_\_\_\_

Address \_\_\_\_\_ Street \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

OPTION 1: RECORD OF IMMUNIZATION				OPTION 2: LABORATORY EVIDENCE OF IMMUNITY OR CONFIRMED CASE OF DISEASE		
<small>This section must be completed by either a physician or someone operating under the direction of a physician (e.g. School nurse, physician assistant, or nurse practitioner).</small>				<small>This section (Form for lab evidence) must be attached to the form or document that you have already had the done(s). If you cannot document a confirmed case of the disease(s), then you must submit laboratory results from a trained laboratory.</small>		
Vaccination Type	1 <sup>st</sup> Dose	2 <sup>nd</sup> Dose	Date of Test	Result of Test	Date of Disease	
Measles	mo/day/yr -/-/	mo/day/yr -/-/	mo/day/yr -/-/			
Mumps	mo/day/yr -/-/	mo/day/yr -/-/	mo/day/yr -/-/			
Rubella	mo/day/yr -/-/	mo/day/yr -/-/	mo/day/yr -/-/			
OR						
MMR	mo/day/yr -/-/	mo/day/yr -/-/	mo/day/yr -/-/			
AND						
Varicella <small>(that also lists MMR)</small>	mo/day/yr -/-/	mo/day/yr -/-/	mo/day/yr -/-/			

**OPTION 1 & 2:** This must be completed by your physician. I hereby certify that this student has received the immunization(s) or has laboratory evidence of immunity as indicated.

Signature of physician or authorized person \_\_\_\_\_ Date \_\_\_\_\_

➤ **Website information:**

0 = Website provides information for undocumented students, including available financial and legal resources.

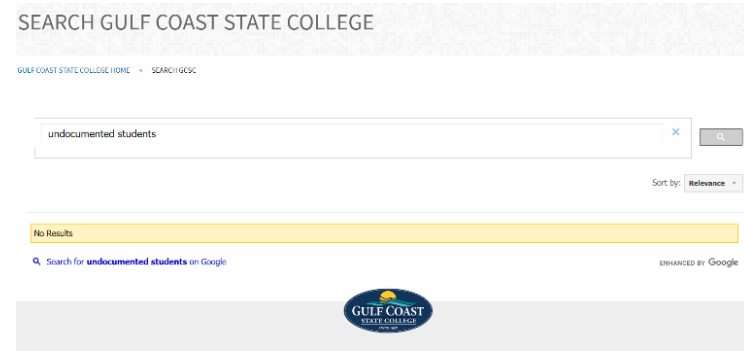
1 = Website does not provide information for undocumented students.



0= The website provides information



1= The website does not provide information



➤ **Admissions staff designated for undocumented students:**

0 = CC has designated staff

1 = CC has no designated staff

**UNDOCUMENTED STUDENTS**

North Seattle College is committed to supporting undocumented students.

It is important to remember that the Family Education Rights and Privacy Act (FERPA) (1974) prohibits schools from providing any outside agency—including the Department of Homeland Security (DHS) or U.S. Citizenship and Immigration Services (USCIS)—with any information from a student's school file that would expose their immigration status. Immigration status should be treated like other student information, such as participation in Running Start or receiving accommodations from Disability Access Services.

Contact:  
Lareina Redwoman  
[lareina.redwoman@seattlecolleges.edu](mailto:lareina.redwoman@seattlecolleges.edu)  
(206) 934-4702

➤ **Language Form:**

0 = English and Spanish

1 = Only English

Minnesota Dream Act Application  
Solicitud de la Ley Dream de Minnesota

Are you a U.S. citizen? [help](#)  
¿Es usted ciudadano de EE.UU.? [ayuda](#)

Select

next

**APPENDIX F.**  
**DESCRIPTIVE STATISTICS ADMINISTRATIVE BURDENS**

	Mean	SD	Min	Max
Social Security Number	1.36	0.83	0	3
Citizenship and immigration documentation	1.12	0.81	0	3
Residency	1.10	0.77	0	3
Notarized Affidavit	0.41	0.49	0	1
Tax forms	0.39	0.54	0	2
Family information	0.35	0.50	0	2
Vaccination or Health Record	0.31	0.47	0	2
Admissions staff serving undocumented students	0.73	0.43	0	1
Admission guidance	0.52	0.50	0	1
Language of the application form	0.70	0.45	0	1
State Financial Aid	0.70	0.45	0	1
Application Fee	17.32	19.17	0	50
In-state tuition cost	4,945	3,595	1,095	8,160
Proportion Und. Students	49,876	64,460	2,710	184,000

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**APPENDIX G.**  
**CORRELATIONS BETWEEN ADMISSIONS REQUIREMENTS**

	Application Fee	SSN	Citizenship	Residency	Affidavit	Taxes Forms	Family Information	Health Records	Admission Staff	Information	Language
Application Fee	1										
SSN	0.117	1									
Citizenship	0.1779	0.498	1								
Residency	0.0822	-0.12	0.2039	1							
Affidavit	0.1957	0.002	0.1819	0.1725	1						
Taxes Forms	0.1482	0.301	0.5155	0.2505	0.4472	1					
Family Information	0.0879	0.271	0.5719	0.2424	0.2822	0.7554	1				
Immunization	0.0448	0.408	0.1334	-0.0609	0.1815	0.2604	0.147	1			
Admission Staff	0.0727	0.349	0.3579	-0.0483	0.0618	0.1911	0.2409	0.0905	1		
Information	-0.0375	0.356	0.3773	0.0363	0.0935	0.3113	0.3603	0.1943	0.5048	1	
Language	0.0305	0.418	0.3928	-0.2019	0.0459	0.3915	0.4324	0.2932	0.4558	0.5207	1

**APPENDIX H.**  
**UNDOCUMENTED STUDENTS SURVEY**



*Postsecondary Education Access for Undocumented Students: Administrative Burdens in the Admission Process*

**HRPP Protocol # 20-477**

This is a survey about how administrative rules and procedures affect undocumented students' experiences in the college application process. This study may promote a reflection upon significant ways in which the higher education policy design and admission process could improve for undocumented students. This page contains important information about this study as well as what to expect if you decide to participate.

This survey is open to undocumented students in the United States of America, who have applied or are applying to any 2 or 4-year college/university. If you decide to participate, the survey will display questions about your experiences as an undocumented student in applying to a postsecondary education institution. Completing the survey should take approximately 15-minutes. You may choose to skip any questions and you may terminate the survey at any time without penalty.

Your responses will be confidential and will not be released to anyone. There are NO personal questions that could reveal your identity or the identities of your relatives. You may experience some emotional stress with questions that may remind you of unpleasant comments or situations that you faced during the admission process, particularly related to your legal status.

If you have any questions at any time, you may contact Andrea Briceno, Ph.D. Student in Public Administration and Policy (CPAP) at Virginia Tech: [bandream@vt.edu](mailto:bandream@vt.edu). You may also contact the VT-IRB office ([irb@vt.edu](mailto:irb@vt.edu)) with any questions regarding this study (**IRB#20-477**).

By proceeding with this survey, you affirm that you are or have been an undocumented student, that you are between 18-23 years old, residing in the United States of American, and that you consent to participate in this study.

In which state do you currently reside?

In which city do you currently reside? (Optional)

What is your age?

What is your country of origin?

How long have you been living in the United States?

- Less than 5 years
- Between 5 - 10 years
- Between 10-15 years
- Between 15-20 years
- More than 20 years

What is your race/ethnicity? (Check all that apply):

- White
- Black or African American
- American Indian or Alaska Native
- Asian

- Native Hawaiian or Pacific Islander
- Hispanic/Latino
- Other

What is your gender identity? (Check all that apply):

- Woman
- Man
- Transgender
- Nonbinary
- Prefer to self-describe
- Prefer not to answer

What is your parents' educational attainment?

- No schooling completed
- High school graduate
- College or some college
- Master degree
- Doctorate degree

Are you a DACA recipient?

- Yes
- I am not eligible
- I am in the application process
- I was rejected
- Other

How did you find out about your undocumented status?

- As a young child
- In high school
- During the college application process
- Other

Did you receive counseling/guidance in high school about attending college?

- Yes
- No

If you did not receive counseling/guidance in high school about attending college, who or what were your main sources of information about the college application process? Choose two (2) options:

- A high school teacher/counselor
- A relative
- A friend
- An organization
- Searched on my own
- Other

If you received counseling/guidance in high school about attending college, how would you rate the quality of that advising?

- Extremely effective
- Very effective
- Moderately effective
- Slightly effective



- Not effective at all

Are you currently enrolled in a 2-year community college or 4-year college/university in the U.S?

- Yes
- No

What attributes does have the institution you attend? (Check all that apply)

- |                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> Two-years college             |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> Four-years college/university |

What are you studying?

How long have you been studying in that program/enrolled in this institution?

- Less than 1 year
- Between 1 – 3 years
- Between 3 and 5 years
- More than 5 years
- I am not studying yet

Before starting the college application process, how familiar were you with the requirements for benefiting from In-State Resident Tuition?

- Extremely familiar
- Very familiar
- Moderately familiar
- Slightly familiar
- Not familiar at all

Before starting the college application process, how familiar were you with the requirements for benefiting from the State's financial aid and/or other financial aids?

- Extremely familiar
- Very familiar
- Moderately familiar
- Slightly familiar
- Not familiar at all

How clear was your current institution's admissions website in displaying information about the requirements for undocumented students interested in applying?

- Extremely clear
- Moderately clear
- Neither clear nor unclear
- Slightly unclear

- Extremely unclear

How would you rate your overall understanding of the college admission process?

- Very easy
- Somewhat easy
- Neither easy nor difficult
- Somewhat difficult
- Very difficult

If you paid an application fee, how much was the cost?

- I did not pay an application fee
- Less than \$25 dollars
- Between \$25 and \$50 dollars
- More than \$50 dollars

How was the process to navigate the admissions process? (For example, meeting paperwork, procedures, requirements, scheduling interviews, etc.)

- Very easy
- Somehow easy
- Neither difficult nor easy
- Somehow difficult
- Very difficult

If you interacted with any college staff during your admissions process, how did you most often do so?

- I did not interact with any college staff member
- By phone
- By email
- By online chat
- Face-to-face
- Other

Powered by Qualtrics

How would you describe your interaction with college admission/staff officers?

- Not stressful at all
- Slightly stressful
- Neutral
- Moderately stressful
- Very stressful

How satisfied were you with the guidance you received from college staff members?

- Completely satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Completely dissatisfied

In your view, during any interactions (including interviews) with college staff members, how appropriate were the questions and comments?

- Appropriate
- Slightly appropriate
- Neutral
- Slightly inappropriate
- Inappropriate

On a scale of 1-5 (where 1 is not all concerned, 2 slightly concerned, 3 somewhat concerned, 4 concerned, and 5 very concerned), indicate your reactions to the following potential kinds of information required in the admission process:

	Not all concerned (1)	Slightly concerned (2)	Somewhat concerned (3)	Concerned (4)	Very concerned (5)	Not applicable (N/A)
Social Security Number	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Citizenship information/visa status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ethnicity/Race	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proof of State residence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Not all concerned (1)	Slightly concerned (2)	Somewhat concerned (3)	Concerned (4)	Very concerned (5)	Not applicable (N/A)
Fill out an affidavit form and take it to a public notary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taxes forms/Individual Tax Payer Identification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Driver License	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health/Vaccination Records	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parents/Guardian information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application fee	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Face-to-face interaction/interviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall, when applying to college, what if anything concerns you the most?

How long did it take to complete the admission?

- Less than a week
- Between one (1) and four (4) weeks
- Between four (4) weeks and eight (8) weeks
- More than eight (8) weeks

How many times on average, did you go to the college to drop off any admission paperwork?

- Never, I completed everything online
- Between one (1) and three (3) times
- More than three (3) times

What recommendations do you have to improve the college application process for undocumented students?

If you face financial barriers to gaining access to higher education, what strategies are you using to address them as an undocumented student? (Check all that apply):

- Family resources
- Institutional Aid
- Private scholarships
- Loans
- Others?

## **APPENDIX I.**

### **RECOMMENDATIONS FROM UNDOCUMENTED PARTICIPANTS**

In both the interviews and open-ended survey responses, participants suggested ways in which college admissions and ISRT processes might be improved. Scholars in higher education highlight the important role that high school counselors play in the trajectories of undocumented youth in higher education. Undocumented youth, first, rely on school personal when seeking college access and financial aid before seeking external assistance (Roth 2017). High school staff, then, evidently should learn about the policies and resources available to support undocumented youth pondering college (Cisneros and Lopez 2016). One interviewee recommended:

“... more counseling during your high school period, especially like your senior year, counseling that is specially aimed towards someone with an immigration status like mine (long breath). If they had more training, high school counselor admission and records from the college. If they had more training if they were more familiar with how DACA works, or how we deal with so many barriers... I think that a lot of barriers could be avoided. Also, with the financial aid office, I think that's another place where training would be good for them. They need to know that, what DACA is and offer more help towards scholarships. But, I feel they are not willing to make a path for us.” (P#1)

Public administration scholars suggest that state governments could reduce compliance burdens significantly if they established administrative data systems that imported and shared information from and with institutional networks. Such arrangements could quickly transfer information and enroll individuals who meet eligibility criteria for particular programs (Herd et al. 2013; Herd



and Moynihan 2015). In the last decade, for instance, the state of California implemented an information synchronization system for public education (Warren and Hough 2013). The system assigns a unique identification number (ID) to information about individual students from elementary through high school. When an individual applies to any state public higher institution, the data are transferred to the application forms, making the process easier. According to two interviewees, this practice substantially lowered compliance and psychological costs. A California respondent praised the state system:

That is why we just need AB540. You literally just need to put your name, the institution, how long you were, how long you were in state school in high school, and then after that they verify it, because we all have a California student ID, since we started education, and so they have to put in your California student ID that you've had you've the moment you're into the California system. You have that same number up until from kindergarten until you graduate high school. So that number you put it in an, then they'll verify that you are you. Then it goes away. P#1

Another participant recommended a similar system for undocumented applicants more generally.

I also think what universities could do is maybe just assign like student numbers to undocumented students so that they don't have to apply with their names, you know and being labeled, and just you do it utilizing these numbers and looking at their high school grades and resumes, that way because I think that... When you see someone's last name, you can automatically make assumptions. You know it's very obvious when it's Hispanic, last name, or when it's an Asian last name, so that alone makes an assumption and you're already prejudging this application without even looking at it. I am pretty sure more undocumented folks would be accepted, assign it that way if they are admitted, give it to them and keep that, but yeah. P#2

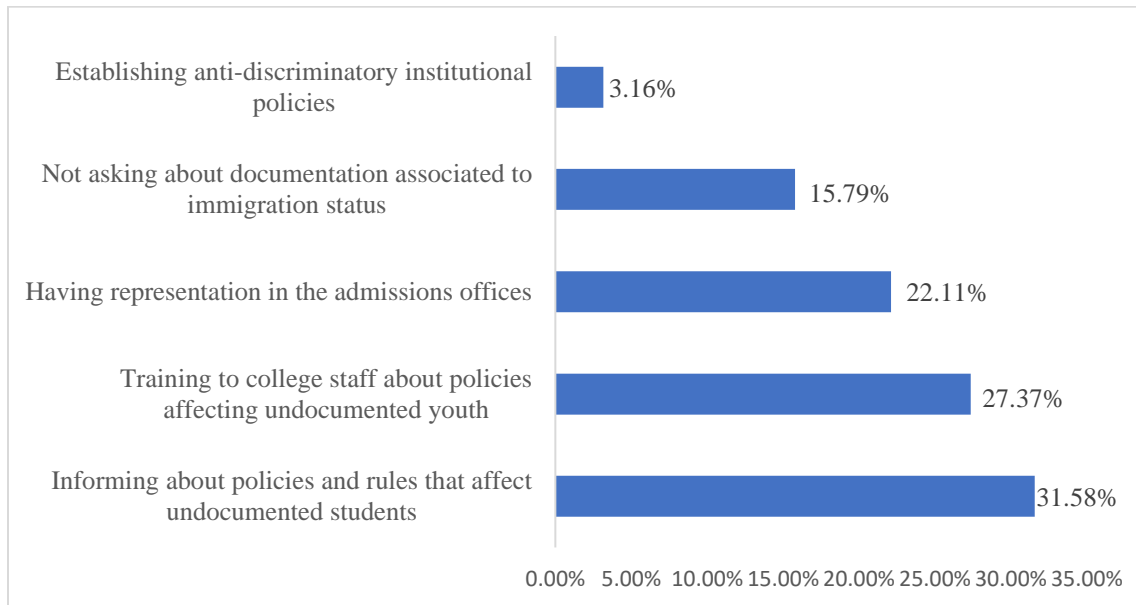
Undocumented youth also found it extremely helpful when institutions had staff trained to serve them.

It depends on the campus size, but it should at least have five representatives. Because if I can say one, that person will be overwhelmed but helping all those students. For example, in California at the university where I work at currently, I want to say there's 800 undocumented students, and there's two people. And yes, there's only two people on that campus that's overwhelming. And then for my institution where I'm at right now there's no one. P#1

Figure 2 categorizes the recommendations of survey respondents. Almost one-third pointed out the importance of informing staffers about the policies and rules that affect undocumented students' access to higher education. This consistent with both the high percentage of respondents who indicated that they face high learning burdens and the continuous complaints of undocumented interviewees about facing a process without having information or guidance about ISRT policy or the requirements and administrative procedures they would face.

Next, survey respondents suggest that college staff should be trained in policies that directly affect undocumented immigrants (27.3%). Similarly, in the survey, admissions officers recommended greater training in higher education policies affecting undocumented immigrants (see Chapter Four). Relevant as well is Chapter 3's finding that community colleges with designated personnel to serve undocumented immigrants enrolled such applicants at higher rates.

**Figure 1. Survey Respondents Recommendations about Admissions Process**



**APPENDIX J.**

**ADMISSIONS OFFICERS' PERCEPTIONS OF USEFULNESS OF THE COLLEGE WEBSITE INFORMATION**

Information <sup>43</sup>	Very useful		Useful		Moderately useful		Slightly useful		Not at all useful		This information is not provided for und. Students		Total	
	n	Percent (%)	n.	Percent (%)	n	Percent (%)	n	Percent (%)	n	Percent (%)	n	Percent (%)	N	%
Admissions policies, requirements, and procedures	39	18.4	65	30.66	40	18.87	21	9.91	7	3.3	40	18.87	212	100
Criteria for Admission	50	23.58	63	29.72	39	18.4	18	8.49	3	1.42	39	18.4	212	100
Paperwork needed	39	18.48	49	23.22	46	21.8	31	14.69	8	3.79	38	18.01	211	100
Available financial options	25	11.79	44	20.75	37	17.45	38	17.92	30	14.15	38	17.92	212	100
Institutional benefits	23	10.85	55	25.94	39	18.4	43	20.28	16	7.55	36	16.98	212	100
Admissions guidance and counseling options (e.g., online chats, email contacts)	79	37.62	56	26.67	22	10.48	15	7.14	4	1.9	24	16.19	210	100

43 On a scale of 1-5, where 5 is very useful, 4 is useful, 3 is moderately useful, 2 is slightly useful, and 1 is not at all useful, please rate your institution's admissions features on the college website from the perspective of an undocumented person interested in applying. How useful is the website information in displaying each of the features that follow?

**APPENDIX K.**  
**ADMISSIONS OFFICERS' PERCEPTIONS OF THE IMPORTANCE OF ADMISSIONS REQUIREMENTS**

<b>Admissions Requirements<sup>44</sup></b>	<b>Very important</b>		<b>Important</b>		<b>Moderately important</b>		<b>Slightly important</b>		<b>Not at all important</b>		<b>Total</b>	
	<b>n</b>	<b>Percent (%)</b>	<b>n</b>	<b>Percent (%)</b>	<b>n</b>	<b>Percent (%)</b>	<b>n</b>	<b>Percent (%)</b>	<b>n</b>	<b>Percent (%)</b>	<b>N</b>	<b>Percent (%)</b>
Attending an in-state high school for a specified period (e.g. 1-3 years),	53	25.24	33	15.71	28	13.33	25	11.9	71	33.81	210	100
Graduating from an in-state high school or receiving a General Educational Development (GED)	62	29.67	41	19.62	26	12.44	27	12.92	53	25.36	209	100
Providing a Social Security Number	11	5.29	5	2.4	11	5.29	20	9.62	161	77.4	208	100
Providing citizen information/visa status	29	13.88	15	7.18	15	7.18	38	18.18	112	53.59	209	100
Providing proof of state residency	39	18.48	23	10.9	28	13.27	22	10.43	99	46.92	211	100
Signing an affidavit stating that they have applied for lawful	21	14.76	6	2.86	26	12.38	21	10.01	126	60.00	210	100

<sup>44</sup> On a scale of 1-5, (where 5 is very important, 4 is important, 3 is moderately important, 2 is slightly important, and 1 is not at all important), please indicate in your view how important each of the following admissions requirements should be for applicants who are undocumented

presence or will apply as soon as they are eligible

**APPENDIX L.  
ADMISSIONS OFFICERS' PERCEPTION OF DESERVINGNESS**

Statements <sup>45</sup>	Strongly disagree		Somewhat disagree		Neither agree nor disagree		Somewhat agree		Strongly agree		Total	
	n	Percent (%)	n	Percent (%)	n	Percent (%)	n	Percent (%)	n	Percent (%)	N	Percent (%)
“Granting in-state tuition to undocumented students gives an incentive for attending college, and eventually contributing to a state's society and economy.” (NCSL 2021)	9	4.31	1	0.48	13	6.22	54	25.84	132	63.16	209	100
“Granting in-state tuition for undocumented students provides incentives for people to immigrate illegally to the U.S, or to remain in the U.S. after their visas have expired.” (NCSL 2021)	105	49.53	34	16.04	24	11.32	29	13.68	20	9.43	212	100

<sup>45</sup> On a scale from 1 to 5, where 1 is strongly disagree, 2 is somewhat disagree, 3 is neither agree nor disagree, 4 is somewhat agree, and 5 is strongly agree, indicate your agreement with each of the following statements.

<p>“Undocumented students who came to the U.S. with their parents as young children should not be deprived of higher education because of their parents' choices.” (NCSL 2021)</p>	9	4.25	4	1.89	8	3.77	16	7.55	175	82.55	212	100
<p>“Allowing undocumented students to pay in-state tuition takes opportunities away from U.S. citizens and legal immigrants.” (NCSL 2021)</p>	155	73.46	23	10.9	15	7.11	8	3.79	10	4.74	211	100

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Graduating from a High School or Receiving a GED	60	3.43	1.46	149	3.04	1.62	-0.039	0.105
Providing SSN	60	1.96	1.42	148	1.29	0.81	-0.676*	0.000
Providing Citizenship status	60	2.61	1.58	149	1.88	1.36	-0.73*	0.001
Providing Proof of Residency	61	2.93	1.69	150	2.23	1.5	-0.701*	0.003
Providing Affidavit	61	2.44	1.65	149	1.85	1.36	-0.59*	0.008
Adm.Req Index	60	0.44	0.27	148	0.29	0.23	-0.15*	0.001

### T-Test Mean Differences Perceptions of Deservingness, by Ideology

Variable	Conservative			Non-Conservative			Mean Difference	P-Value
	N	Mean	SD	N	Mean	SD		
i. "Granting in-state tuition rates to undocumented students gives an incentive for	60	3.98	1.08	149	4..6	0.84	0.62*	0.000

attending college, and eventually contributing to a state's society and economy.”

ii. “Granting in-state tuition rates to undocumented students provides incentives for people to immigrate illegally to the U.S, or to remain in the U.S. after their visas have expired.”

61 2.98 1.51 151 1.84 1.22 -1.13\* 0.000

iii. “Undocumented students who came to the U.S. with their parents as young children should not be deprived of higher education and ISRT benefit because of their parents’ choices.”

61 4.18 1.24 151 4.8 0.76 0.620\* 0.000

iv. “Allowing undocumented students to pay in-state tuition takes opportunities away from U.S. citizens and legal immigrants.”

61 2.09 1.32 150 1.33 0.89 -0.765\* 0.000

Index Perc. Deservingness

60 0.66 0.18 148 0.61 0.098 -0.47 0.01

### Correlations

There is a positive relationship (0.28) between admissions officers who identify themselves as politically conservative and a higher level of support for administrative requirements. Further, confirming similar scholarly work in this matter, the results show a negative relationship between the perception of deservingness and the level of support for administrative requirements. Those admissions officers who perceive undocumented youth as more undeserving of ISRT benefit are associated with higher support for administrative requirements when they apply for such benefit. This confirms how the policy-making process embedded more burdens for those groups perceived as powerless and undeserving of public benefits (Schneider and Sidney 2009). The correlation between the level of support for admissions requirements and the frequency of interaction with undocumented youth is negative (-0.12). In practical terms, the less interaction with undocumented youth, the higher the level of support for requirements. This could confirm previous empirical works that show that higher levels of interaction with target populations result in less support of administrative requirements when such population claim public benefits (Gielens, Roosma and Achterberg 2019; Jilke and Tummers 2018).

**Admissions Officers' Levels of Support for Administrative Burdens, Political Ideology, and Social Construction**

Variable	Support Adm Req	Ideology	Index Social Construction	Frequency Interaction
Level of Support Administrative	1			

Ideology (Conservative)	0.2874	1		
% Deservingness	-0.1876	0.2138	1	
Interaction	-0.1247	-0.0527	-0.0722	1

Note: Values are Pearson's rs. N = 209. Correlations between conservative political ideology, perception of deservingness and level of support of admissions requirements are statistically significant ( $p < .005$ ). Correlation between perceptions of deservingness and frequency of interaction is not statistically significant at  $p < .05$ .

**APPENDIX N.  
STANDARDIZED VS. PARTICULARIZED ADMISSIONS PROCESSES**

**Preferences around establishing standardized or particularized admission processes for undocumented students by political ideology (n=154)**

<b>Conservative and Slightly Conservative</b>	<b>Middle of the Road</b>	<b>Liberal and Slightly Liberal</b>
<b>More Likely to Support Standardized Application</b>		<b>More Likely to Support Particularized Application</b>
Standardized admission is more efficient	Students need to be serviced on a one on one basis based on their needs. Everyone's need is different.	It is unreasonable to expect undocumented students to provide the same "universal forms" as others
We all have different forms and processes. It would be easier to navigate one process.	I think it needs to be a combination of both, with a holistic approach to each applicant, for both documented and undocumented students.	Not every student will have access to the same kind of documents. If we standardize the documents across the board, it will disenfranchise some students.
I think it takes a little bit of both. You need standard requirements, otherwise you risk discrimination or favoritism if you allow a case by case basis. I think each college should	A standardized/universal form will create a clear expectation of information from each	Standardized requirements are based on the majority which ignore minority groups, which collectively could make up a portion of university.

have their own terms for applying and documentation, but when it comes to state funding and financial aid you would have to adhere to a universal guideline.

Uniformity ensures that treatment will be the same at every institution

Uniformity ensures that treatment will be the same at every institution

All students should meet the minimum requirements to attend an institution and the standardized forms should be simple enough that all students should be able to complete them.

student. It will aid the student with gathering needed information and streamlining the application process for multiple submissions to various institutions.

Standardized form create fairness

Standardized requirements ensures that all students are given the same rights and access to the same level of education. I think for the state system, it's a great option since the schools all fall under the same umbrella. It could create a stronger divide between the public and private higher education options.

Nationally standardized requirements will be woefully unresponsive to individual states' needs

If you make standards universal, these will always benefit one group more than another.

Creating a single admissions process does not create equity. Undocumented students may need additional documents for financial aid eligibility or to access additional resources that they don't have.

Students need to be serviced on a one on one basis based on their needs. Everyone's need is different.

To provided equity to all student undocumented or domestic seeking admissions into a higher education institution

I think it needs to be a combination of both, with a holistic approach to each applicant, for both documented and undocumented students.

I would like to see higher education available to everyone. If it was a simple process and removed barriers it would be better. Because we have open enrollment, I would like to see other schools do so. I guess it may depend if they are strict requirements or forms.

A standardized/universal form will create a clear expectation of information from each student. It will aid the student with gathering

You can't make something standard when you are working with various groups of people with different stories. We would ask for slightly different requirements to measure academic success.

Undocumented students would be assessed with what that individual has and then work with them. They can have a HS diploma equivalency from another country even and it is likely that the international admissions counselor would be able to guide them.

I'm not sure I completely understand the question, but I do feel that the institution should be able to have individualized policies that reflect their population of students.

Because students with different identities and backgrounds have different needs and require different supports through the process.

Each institution operates a little differently and has different policies, even state institutions.

Not every student has the same access and opportunities within their local education system. Standardized guidelines will limit access for students from less wealthy schools.

We can tailor applications for specific pops. Can cut down on confusion or roadblocks

needed information and streamlining the application process for multiple submissions to various institutions.

Standardized form create fairness

Standardized requirements ensures that all students are given the same rights and access to the same level of education. I think for the state system, it's a great option since the schools all fall under the same umbrella. It could create a stronger divide between the public and private higher education options.

I think it it's important to standardize equity policy but have flexibility in the system to account for difference

I think it is more important to be consistent so students have similar experiences and can choose from various options rather than having to learn or deal with individual processes that may pose additional barriers.

For the earlier scale, I find rhetoric that blames parents to be problematic, and is best avoided. On the above question, you and I both know even with standardized forms, implementation can be uneven. Sometimes this flexibility allows for equity, and sometimes it is used for

I do agree that Undocumented students may need more advising/assistance when looking at college and should have procedures that reflect this need.

I think every student should be looked at on an individual basis.

Students are not all the same and as a result any requirement, procedures in order to be truly equitable would need to consider that students full story and background and flex accordingly.

There is no standard for humanity and human experience.

Every situation and every student is different. We already don't require the same thing from the same people, we may as well tailor it.



certain actors to be more restrictive. Speaking as a representative at a public institution, I think SUNY would benefit from system-wide guidance on admission procedures and in-state tuition steps.

All students should meet the minimum requirements to attend an institution and the standardized forms should be simple enough that all students should be able to complete them.

I chose standardized from the standpoint of thinking about public institutions, and I selected it because a universal application process may make navigating the application process less burdensome for students/families with less familiarity with the US college application process.

Because some colleges and universities may be unfair to undocumented students.

Each institution has different capacities, target populations, community demographics, etc. which all impact admission requirements. Additionally we tailor our forms to our prospective student population so that they are written in a way to ensure they are understandable. As a 2-year institution with an open-door policy we have a much different experience for students than that of a 4-year selective admission institution, therefore having state mandated requirements and forms would either make our standards stricter or make the universities lower, which serves neither of us.

As a community college, we need to be the MOST open access for an education to everyone in the community, but we use standardized admissions' requirements that limit student's access to education.

All student have different experiences whether it be academically, financially, or socially. Grouping all student under one standard admissions practice is a disservice to all students regardless of privilege or background.

No one should be singled out by an application or put through more steps or barriers because of their status or who they are.

It's more equitable

Absolutely. Every state should also have a way to apply to every public school using one application, whether it is their own or that all members join Common App.

It is easier for student to complete. This is important from an equity standpoint for students who may be first generation or do not have a lot of experience with the college application process.

I don't know the right answer. But if there is more than one form, students might not know and fill out the wrong thing. I think having undocumented students apply the same way all other students apply, and then making sure we have staff to follow up and help them along is best.

This will help streamline understanding and opportunity while eliminating the potential of discrimination within individual college application and recruitment practices.

Different institutions have different target populations with different educational backgrounds and needs. Standardized admissions requirements may be equal, but it is not equitable.

Equitable does not mean same or an identical experience.

We are test-optional and understand the cultural biases and systemic oppression that comes with standardized applications forms. We see significantly greater results focusing on particularized admission requirement.

Each student has a unique application path and should be approached on a case by case basis.

Standardized admissions are proven to be biased

Particularized admissions forms may allow us to identify appropriate resources to assist these populations; their needs and requirements may be different than other students.

I think one standardized process would help all students have access to higher education.

Admissions requirements should be standardized that apply to everyone and do not discriminate regardless of status in the US

I believe standardized policies and procedures make higher education more accessible to students. The transparency of what a student needs to accomplish before applying is apparent.

Particularized requirements and forms would cause confusion among the State's 3 public institutions, so it is more efficient standardized.

For first generation and undocumented students a streamlined standardized admission process would be easier to navigate. Having different requirements at different institutions is confusing and off putting. For example, undocumented students may apply and be

Standardized requirements does not make equitable admission because it doesn't address the fundamental issue.

Every demographic has different needs and each should be able to tailor admissions processes

Asking all students to fill out the same forms and the same documentation can cause inequity. For example at my current institution one population that has to fill out specific forms with the help of their guidance counselors are students with conduct issues. It would be unfair to ask all students to fill out those forms since many underrepresented/marginalized students may attend schools that are understaffed with guidance counselors or other people who can help them navigate these forms.

We should be meeting students where they are - if they need additional information to succeed & submit then we should be providing that. Creating a standard form only allows us to connect with the most "average" student.

Standardization always reinforces structural inequalities

admitted to some public colleges in Georgia, but not all.

Transparency and cohesiveness. Less confusion from the student if all colleges use the same guidelines, if the student decides to apply elsewhere.

I think when a process or requirements are formatted to one particular population, too much opportunity for further segmentation of that particular student population can occur. Even in our current system where undocumented students provide a notarized affidavit to qualify for in state residency for tuition purposes, those students and their families often experience concern or confusion since the reason they have to complete that additional form is because they are undocumented (potentially feeling singled out or worried about possible implications associated with being identified as having submitted that form).

I believe that in order to serve all students in the State of Texas, the public universities and colleges need to have standard admissions requirements and forms in order to make the process easy and streamlined.

At the end of the day, we need to make sure this student will be academically successful at

I think that schools should meet their students where they're at and provide them with ways to get in that are suited for the methods they would use.

The starting line is different for everyone, we should not expect their finish line to be similar

I believe it is impossible to create a standardized admission form in a country with as much institutionalized racism as we have. We need to curate a solution for the populations we are trying to help.

The same reasons that standardized tests fail students every day. Students who lack the same resources as others will have even fewer choices to navigate the

our institution. These academic requirements can be standard for all students.

Particularized admission requirement for specific groups can lead to special treatment and legal issues, also it is unfair.

I don't know the right answer. But if there is more than one form, students might not know and fill out the wrong thing. I think having undocumented students apply the same way all other students apply, and then making sure we have staff to follow up and help them along is best.

Hard work pays off

It's already a smooth process. There are rules in place for everyone. Why should it be easier for illegals? Shouldn't it be equal across the board?

admissions process, if any at all, for their college experience. One size shoe does not fit all.

We have to look at students in a holistic lens. Undocumented students already face many barriers and challenges that affect their daily lives but attaining an education should not be one of them.

Standardized admission requirements are often not a good measure of someone's aptitude for success

Each program and individual are unique. Standardizing/universal admissions requirements do not fit all situations. Undocumented students cannot meet some standards forms.

Standardized admissions doesn't mean equality, in a society that harbors institutional racism and micro-aggressions a equalized standardized form and process could be hard to achieve

Having one standard for every school in the state will most likely raise minimum requirements at certain schools, preventing enrollment of entire groups of once-viable applicants. Most admissions standards are based on standardized testing, which in its current state does not accurately represent a student's ability

to achieve success. The system would be "equal," but not equitable.

There may be different state assembly bills that may have varying requirements, which may be removed if we decide on cookie cutter fits all response.

Every student is different. Standardized requirements allow for people to fall through the cracks because they tend to be too broad.

Each person is unique. No allowance for their situation may not benefit them and may have unintended consequences.

All students are different, regardless of their status. Admission requirements should be as fair as they can be, but also should take into account the different situations a student may be facing as much as the institution possibly can.

Each student is different, and oftentimes relying too heavily on standardized procedures and forms disenfranchises entire groups of people.

I believe that centering the most marginalized populations when thinking about forms and requirements is the best approach to providing the most inclusive experience for all users.

Knowing your population is incredibly important to the admissions process, we cannot have a standard application that only fits a majority of students because then the minority students will feel ignored and that defeats the entire purpose of higher education.

I work with specialized populations of students in the admission process. Whenever standardized/universal policies are implemented, they hurt different populations. Therefore, I am more inclined to create particularized admission requirements to meet the needs of specialized populations.

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**APPENDIX O.**  
**RECOMMENDATIONS REGARDING ADMISSION PROCESSES FOR UNDOCUMENTED STUDENTS**

**Recommendations regarding admission processes for undocumented students by category and political ideology (N=166)**

Category	Ideology	Answers
Training for High school's and college' staff about ISRT policies and educational opportunities	Conservative	Training about policies/admission requirements for high school counselors.
	Slightly Liberal	Better information from high school counselors and teachers, especially in larger public schools. Most students in large public high schools are left to fend for themselves. Every school says it wants to develop a college going culture, but we're not honest with our kids. We have seniors who think they can get into any school they want, even the Ivy League, but they have no chance. We are not honest about the wide variety of schools that exist.
	Liberal	Training for high school counselors
	Conservative	Policies and institutional rules training
	Liberal	Transparency on online platforms and training for front line staff. Institutional audits of paperwork and forms to check for all the places that the citizen- international student dichotomy is assumed.
	Liberal	Forms in multiple languages and staff who speak more than one language to explain the process
	Slightly Liberal	Better guidance at high schools.
	Middle of the Road	That everyone on campus know the processes so that proper information can be provided to students and their families
	Slightly Conservative	Better guidance from their high schools, without question. More informed high school counselors and teachers. Less myth and hype and more practical, real advice and understanding. High Schools need to stop creating a college going culture and start creating a college-ready culture. These two are not the same.



	Liberal	Better training for admissions staff so they don't tell students incorrect information.
More Counseling and Staff Dedicated to Serve Und. Students	Middle of the Road	Offer help undocumented students to come in and we can help them apply or they may have a third party working with.
	Liberal	Using clear and simple language, taking the stigma away from being undocumented, offering bilingual staff, and grouping relevant information together on institution webpages.
	Middle of the Road	Having more one-on-one help from an Admissions Recruiter in person to be able to understand how the college works and to feel more welcomed and accepted in the college.
	Liberal	Close relationships with the family and admissions/financial aid staff to foster trust and comfortability in the process.
	Slightly Liberal	Making it less tedious and cumbersome would be helpful - with more language options so parents and/or guardians can be more involved and knowledgeable
	Middle of the Road	Counseling and guidance
	Middle of the Road	Clear guidance on expectations and easier pathways to afford a college education, especially those that do not qualify for in-state tuition or financial aid covered by the state.
	Liberal	Having guidelines that reviews them individually. I.e. a student who's spent their last year in the US, academic outcome will be different from a student who was brought here as a young child or born in the US.
	Liberal	More transparent advertisement of costs and financial aid, and a more direct FAQ/office contact for undocumented students.
	Middle of the Road	More information in multiple languages, a dedicated advisor in the admissions process and after they enroll admissions can transfer them to get useful information about travel to and transitioning to campus
Liberal	Streamline it with regular admissions application but provide clear options for undocumented students to discuss with available staff.	
Liberal	Having someone on our campus who is assigned to undocumented immigrants to help them complete the admissions requirements and start college.	

Middle of the Road	A dedicated admissions counselor and financial aid officer assigned to them who can better understand their situation and provide more specialized support.
Conservative	Personal case management and guidance when inquiries are made
Liberal	To have a specific office to assist these students so they can be successful. Or at the very least a contact person that will be able to walk them through the process.
Slightly Liberal	Financial aid information sessions to help undocumented students access the right forms they will need.
Slightly Liberal	Undocumented student competency among admission staff as a whole and explicit support and help for undocumented students
Liberal	While admission requirements and processes should ideally be standardized, I think the communication and the support provided should be tailored to the student population it serves - and making sure undocumented students and their families have the resources they need to be successful.
Middle of the Road	Having a specific department who is trained to navigate the complexities that undocumented citizens face.
Liberal	I would love to see a specific point of contact with the admissions office for helping undocumented/ DACA-mented students. Being able to focus on niche issues and hone in on the specifics of qualifications would be helpful.
Liberal	Target outreach to this population.
Liberal	Early outreach and education, so that undocumented students and their families know and understand that college access is available for them.
Liberal	Providing students with a designated contact at the institution
Liberal	Transparency, admissions contact, and accurate timelines.
Liberal	More admission offices need to understand more about undocumented students
Liberal	Less legal language and more friendly language. create a page specifically for Undoc students to navigate the website and have one person assigned to only work with undocumented students.

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Middle of the Road	Undocumented students would benefit in the admission process by having a central advisor or point of contact in the admission process. I am not saying having one individual in the admission office specifically designated for undocumented students but having advisors that understand the needs and concerns of undocumented students and provide service accordingly.
Slightly Conservative	Having a specific admissions counselor assigned to help them

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Middle of the Road	Website information and forms in Spanish, which is our biggest group of undocumented students.
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Liberal	Providing CLEAR instructions on HOW to apply for admission AND financial aid. Also, improving the FAFSA to better understand the fears of undocumented students and parents in terms of supplying personal information to the federal government.
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Provide Accurate Information

Liberal	Clear information on websites about what funding students can qualify for, how the application process works, and so on.
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Slightly Liberal	Clear steps and instructions.
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Liberal	More information in multiple languages, a dedicated advisor in the admissions process and after they enroll admissions can transfer them to get useful information about travel to and transitioning to campus
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Liberal	A separate application or at least wording included those outlines what/how they should apply to college. A Retention contact within the Admissions Office would be helpful to ensure that from start to finish these students have all the necessary resources and tools to be successful-this includes family planning nights, FAFSA workshops, monthly check-ups and more.
Liberal	Having a specific webpage as part of the Admissions/Financial aid suite dedicated to Undocumented students. Having regular PD for staff on how to work with Undocumented applicants.
Liberal	Clear information; financial aid that's not private loans
Liberal	Our website could provide additional, more explicit information for undocumented applicants. However, this is a conscious decision by the university - by not tracking this information, we can never be asked to provide it to ICE/INS.
Slightly liberal	More transparent advertisement of costs and financial aid, and a more direct FAQ/office contact for undocumented students.
Liberal	Using clear and simple language, taking the stigma away from being undocumented, offering bilingual staff, and grouping relevant information together on institution webpages.
Liberal	What would make the process easier is having a specific page for undocumented students, sharing resources in major events and information sessions, and having one main contact on the website to know where to direct questions (who preferably should be bilingual).
Liberal	Clear information online that students can access without speaking to a university representative, as students are sometimes concerned about sharing their undocumented status.
Middle of the Road	Our state does provide in-state tuition for undocumented students. More information about that and the WASFA (Washington FAFSA) would be helpful.
Liberal	Dedicated pages specifically for undocumented students. My institution effectively puts it in as a disclaimer on various pages. Information on what it's like to be an undocumented student here isn't even contained on the admissions portion of our website. No student would think to navigate to the page that does house it.

Liberal	Having a specific webpage as part of the Admissions/Financial aid suite dedicated to Undocumented students. Having regular PD for staff on how to work with Undocumented applicants.
Liberal	Clear information on websites about what funding students can qualify for, how the application process works, and so on. Better training for admissions staff so they don't tell students incorrect information.
Liberal	More resources and specific web-links for admissions for undocumented students
Liberal	More transparent communication about scholarship/financial aid opportunities.
Conservative	Clearer information for undocumented students on college admissions websites. Clearer information about financial aid too.
Slightly Liberal	Clear language and instructions
Slightly Liberal	Clear guidelines of what documentation they will need to apply and become students. Easy access to ESL programs if English is not their first language.
Liberal	More clear information on college websites and more active non-profit organizations in support of students during their secondary school/HS years.
Slightly Conservative	Inviting students to participate in workshops, having a landing page specifically for undocumented students and better legislation and policies to have more than two paths to citizenship.
Liberal	Having clear policies on an institution's view/requirements/financial support for undocumented students.
Liberal	Communication about eligibility for aid (merit, talent, and need).
Middle of the Road	The biggest issue in my opinion is lack of clarity regarding financial support & realistic expectations of cost. We are known for being "affordable" but that term means so many different things to different people.
Slightly Conservative	Providing CLEAR instructions on HOW to apply for admission AND financial aid. Also, improving the FAFSA to better understand the fears of undocumented students and parents in terms of supplying personal information to the federal government.
Liberal	Translations of website and documents
Liberal	Clear information and simple admission processes

	Conservative	Specific resources or websites that are developed specifically for undocumented students, including FAQ sections. This way they can access the information that is specifically to their situation and then they do not have to be embarrassed by disclosing that information if they are uncomfortable. Also the ability for students to connect to other students is extremely helpful.
	Liberal	Access to information.
	Liberal	More resources
	Slightly Liberal	Financial aid that's not private loans
	Slightly Liberal	Federal funding and anti-racist immigration policies at the state and federal levels
	Slightly Liberal	State financial aid access
	Liberal	We only require an I-797 as an additional requirement for undocumented students, which hasn't (at least in my experience) proven to be an issue of note. What would help most is having financial aid or state financial aid available to this group of students.
	Liberal	Greater availability of federal aid.
Provide Financial Resources	Liberal	Granting them in-state tuition if they meet all requirements for state residency other than being documented. Cost is the greatest barrier.
	Conservative	Allow for financial aid opportunities, even if it is only loans.
	Liberal	Go to a community college to get started and save a ton of money
	Liberal	Financial resources
	Slightly Liberal	Transparent funding
	Slightly Liberal	Easily finding resources and qualifying for financial aid
	Slightly Liberal	Federal regulations that allow undocumented students the opportunity to study in US HE institutions. As well as allowing federal funding to support cost of education.
	Slightly Liberal	Our current process I believe does not discourage undocumented students from applying or being admitted. The biggest issue we face is typically AFTER the acceptance on the financial side, though we do give all accepted students institutional aid regardless of their documentation status.

Slightly Liberal	Allowing them to apply for federal financial aid.
Liberal	Our process isn't very different from traditional admissions. The only difference is that a student must provide an I-797 form in conjunction with their transcript and test scores. I believe awarded state aid (and affiliated scholarships) SHOULD be implemented.
Liberal	Admissions is generally the easy part... in our experience undocumented students will be admitted to multiple schools without any discrimination. Financial aid is the entire hurdle as FAFSA is not obtainable without a SS#.
Slightly Liberal	Federal Financial Aid eligibility.
Slightly Liberal	Financial aid. Bright kids that need funds.
Liberal	If states provided in state funding for them.
Liberal	Allowing financial aid opportunities that are not contingent upon completion of the FAFSA
Middle of the Road	If they could receive the in-state tuition rate. My school does not provide the in-state tuition rate to undocumented schools.
Liberal	Linking them to outside financial resources that are legitimate.
Liberal	free tuition for all as even in state tuition is still too expensive for them
Liberal	Automatic consideration for House Bill 144 (In-state tuition).
Liberal	The admission process is not the issue for us, it is a matter of funding. Undocumented students are typically not eligible for federal or state grant programs, which makes it significantly more difficult for an institution to adequately fund them so they can afford to enroll. Otherwise, they face the same admission barriers as all other low-income students regardless of citizenship status.
Liberal	More funding from the states and the federal government
Liberal	Make the financing easier.
Slightly Liberal	Provide federal financial aid to all students enrolled regardless of their status
Liberal	Each institution should offer more scholarship money undocumented students, especially those who show excellent merit in high school.
Liberal	More scholarship opportunities for them.

	Slightly Liberal	Providing financial resources.
Reduce the amount of requirements/documents/paperwork	Liberal	Less requirements such as state IDs to show residency, guidance on applying for additional funding.
	Liberal	Ensuring undocumented students understand that immigration documents are not needed nor are they part of the admissions process and that they understand that we will not share their information with immigration authorities.
	Liberal	Removing making certain questions on the application required fields. (i.e. do not require students to fill out the SSN question.)
	Liberal	Admissions processes should not make decisions on admissions based off of citizenship. If the student meets the requirements for academic success, you work with them on enrollment after being admitted...not before.
	Liberal	Just to ask for the state residency proof.
	Liberal	If SSN numbers weren't required for college applications.
	Conservative	An easier path to citizenship in the U.S. Or at least an ability to be considered a resident of the state in which they live.
	Slightly Conservative	Clarifying the residency sections of application. State residency proofs should be a priority instead of citizenship or country of origin.
	Middle of the Road	We have eliminated requirements and paperwork due to COVID and I hope we maintain this policy moving forward.
	Middle of the Road	We eliminated the need to have a SS#. We don't need it for admissions purposes and this way students don't feel they have to have one or lie and falsify info.
	Slightly Liberal	Quit asking for their status, if they can meet residency requirements for the state (live for more than 3 years in the state, and parents pay taxes in the state), they can pay in-state tuition rates.
	Slightly Liberal	Access to state IDs to show residency, guidance on applying for additional funding.
	Liberal	For high school students, if they have graduated in the past year from a public high school and were there for a year and photo ID should be all that is needed for admission and in-state tuition.
Middle of the Road	Not requiring a verification of selective service (this is a requirement in the State of Colorado)	



	Liberal	A simple free application for admission without meaningless forms.
	Middle of the Road	Not asking for so many requirements
	Slightly Conservative	If states provided in state funding for students and if SSN numbers weren't required for college applications.
	Slightly Conservative	Removing the need for 3 years of NJ High School for financial aid eligibility
	Slightly Liberal	Less paperwork
	Slightly Liberal	Not asking for requirements
	Middle of the Road	Less residency documents but we know they are necessary to submit.
	Conservative	Other than requiring them to obtain legal status, nothing.
	Liberal	Not asking for affidavit, or residency pieces to determine tuition rate
	Liberal	Not requiring a social security number
	Liberal	Provide explicit information that a SSN is not required and explicit instruction as to what financial resources may be available since FAFSA is not.
	Slightly Conservative	No require citizenship status
Equity in the Admissions Process	Conservative	Getting a new president who's not an immigration idiot and understands equity
	Middle of the Road	We shouldn't have differential forms of tuition. People are people. International students shouldn't have differential tuition either. We should also have high-tuition/ high-aid models that meet EFC. Functionally, these aid pots might need to be separate for US and non-US students. Undocumented students should be included as US students. But, overall, US borders reinforce colonial structures.
	Slightly Liberal	Undocumented students should NOT have to fulfill the same requirements as international students to be admitted.
	Slightly Liberal	More social movements advocating for their needed presence in higher ed spaces. That not only the best and brightest attend these spaces. That undocumented students can be provided funding and belong in these spaces.

	Slightly Liberal	Standardized admissions processes regarding admissions entry
	Liberal	Federal funding and anti-racist immigration policies at the state and federal levels
	Liberal	More equitable access to educational opportunities when going through the K-12 system and society at large.
	Conservative	Universal checklist for undocumented students to complete. This will ensure a level playing field. It should not be a hinderance for these students to find and complete these steps.
	Slightly liberal	Providing more funding to undocumented students; ensuring undocumented students are treated like domestic students (so if you're need-blind for domestic students, you should be need-blind for undocumented students).
	Liberal	Treat them the same as your state's residents
	Liberal	Treat them the same as U.S. Citizens.
	Liberal	Provide funding equal funding, scholarships, and assistance equally for documented or non-documented.
Reduce Fear When Applying	Slightly liberal	Getting undocumented students and their families to believe us when we say we won't reveal their status after they apply (we're seeing fewer and fewer undoc students apply for admission despite our friendly policies after the 2016 election); include undocumented students in your fly-in and travel grant programs; be visible in your support (we have developed a laminated placard for college fair tables saying we support undoc students and have our undoc policy on our admissions website)
	Liberal	Being informed and knowing they can disclose their status.
	Liberal	If undocumented students understood that we are here to help them and we will not report them even though we work for the state/county governments.
	Conservative	Ensuring undocumented students understand that immigration documents are not needed nor are they part of the admissions process and that they understand that we will not share their information with immigration authorities.

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Liberal	Not having to self-identify as undocumented in the application process, but find an easier way for them to self-identify earlier in the process without causing fear or anxiety. We want to ensure that all students know of the resources that are available in the institution to support them (academic, financial and personal).
Liberal	First is notifying them that applying to college is a realistic possibility. Many undocumented students are not even aware that they can come to college out of fear.
Slightly Liberal	Providing CLEAR instructions on HOW to apply for admission AND financial aid. Also, improving the FAFSA to better understand the fears of undocumented students and parents in terms of supplying personal information to the federal government.
Slightly Liberal	It would be easier if there was less stress and fear. Unfortunately, these are contributed by the wider society in addition to colleges
Liberal	Clarity, knowledge that they are safe when they speak to us, and their options given up front on a website.
Slightly Conservative	A federal government that isn't driven towards making undocumented immigrant students lives hell.
Liberal	Creating a culture of transparency without fear of repercussion so they feel honest about sharing the fact that they are undocumented would make this easier for everyone. It's really not a problem for us to have undocumented students attend our college. The problems arise when the applicants are not truthful up front about their visa status, or lack thereof.
Liberal	Taking away the fear to disclose their status
Slightly Liberal	Students should now that colleges will not release status information
Conservative	Explicitly stating that their presence is welcome and desired, and encouragement to apply
Slightly Liberal	I believe it is very easy now, but there is still some "fear" from undocumented students to potential barriers
Liberal	It would be easier to help these students if we could take the fear out of the process. Schools tend to be fearful of clearly outlining their willingness to help undocumented students and students tend to fear sharing their status.

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Liberal	To remove the stigma that undocumented folks cannot receive scholarships
Slightly Liberal	Using clear and simple language, taking the stigma away from being undocumented, offering bilingual staff, and grouping relevant information together on institution webpages.
Liberal	On the webpage explain they are welcome even if they have to pay the higher fees.
Liberal	Assurance that their status is kept private and secure and will not be shared with any agency including the government.
Liberal	Clearer ways to identify as undocumented securely.
Liberal	To have a process for helping them get documented status without jeopardizing their ability to remain in the country as long as they stay in school. Much like our F-1 program.
Liberal	If we signed a contract as employees stating that we will never discuss a student's immigration status outside of their presence to establish some sort of trust.
Liberal	Statements clarifying their safety in sharing this information
Liberal	Being informed and knowing they can disclose their status.

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