

The Liminality of Being:  
The Obfuscation of Race on Scholarship of Undocumented Students in Public Education

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15 June 2018

*Abstract*

*Plyer v. Doe* (1982) provided undocumented youth access to public education, and in delivering the opinion of the court, Justice William Brennan quoted the ruling of *Brown v. Board of Education*, saying, “Today, education is perhaps the most important function of state and local governments. ... It is the very foundation of good citizenship” (quoted in *Plyer v. Doe*, 1982). Much has been written to nuance our understanding of citizenship as more than just legal status in the United States. While many scholars have addressed how the cultural citizenship and liminal legality of undocumented students is a way to frame access to education, less has been written about the racialized experiences of undocumented youth within schooling institutions. This paper aims to consider how race is obscured in the literature and to make the case for scholarship that more intentionally develops an intersectional critique of how racism, immigration, and education collude to impact the experiences of undocumented students.

**Keywords:** undocumented students, liminal citizenship, critical race theory, public education

## Introduction

The body of the undocumented<sup>1</sup> immigrant is arguably a highly contested space of il/legality and non-citizenship, historically and legally rendered *alien*, often criminalized and Othered. The question of the undocumented immigrant has often perpetuated a discourse of criminality, constructing a language of transgression and illegality that is often complicated when undocumented youth are taken into account. Surrounding these discourses of criminality emerges a narrative of deservingness (Patel, 2015; Kibria et al, 2018) that further stratifies immigrants on who is constituted as “good” and who is constituted as “bad,” with undocumented students<sup>2</sup> often positioned as a kind of model minority within that framework in their pursuit of education (Buena Vista, 2018) and therefore more “deserving” of being granted access and rights (Patel, 2015). Surrounding these discourses is a movement to re-negotiate and nuance of what it means to be a citizen in America (Menjívar, 2006) and to acculturate and assimilate into mainstream society through schooling as a site of possible social and economic mobility (*Plyer v. Doe*, 1982).

A seminal court case on public education in the United States, *Plyer v. Doe* (1982) provided undocumented youth access to K-12 education, and in delivering the opinion of the court, Justice William Brennan said, “Illiteracy is an enduring disability. The inability to read and write will handicap the individual deprived of a basic education each and every day of his life.” As a warning to what the loss of education could do, the Supreme Court instead argued to position education as integral to advantaging individuals in their everyday lives and experiences,

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<sup>1</sup> Much has been said to critique the label of *undocumented* as insufficient for encapsulating the identities and experiences of those who are without “proper” legal status in the United States. I acknowledge the limitations and moves some scholars and writers have used toward using *unauthorized*. However, in conjunction with the undocumented youth and young people I have worked with, I have decided to use *undocumented* throughout this paper to acknowledge the words of identification they’ve shared with me as an aspiring ally.

<sup>2</sup> Regarding the scope of this paper, *undocumented* refers to those who have crossed the border illegally and/or overstayed their visas, therefore not having “correct” documentation for legal status.

thus implying education functions as a basic condition of participation in the United States. Quoting the ruling of *Brown v. Board of Education*, Justice Brennan went on to say, “Today, education is perhaps the most important function of state and local governments. . . . It is the very foundation of good citizenship” (quoted in *Plyer v. Doe*, 1982).

A pioneer of multicultural education, scholar James A. Banks (2008) once wrote that, “A universal conception of citizenship within a stratified society results in the treatment of some groups as second-class citizens because group rights are not recognized and the principle of equal treatment is strictly applied” (p. 131). Banks (2008) addresses citizenship in order to discuss what he calls *citizenship education*, a way of framing education as a space to teach values of full and effective civic participation within the nation-state. Banks (2008) argues that universalizing the conception of citizenship does not take into account how marginalized identities intersect with citizenship to produce differentially situated positions. That is to say, there is a presumption that everyone’s experiences as citizens are universal, without consideration of the organizing logics that reinforce and maintain stratification across social constructs such as race, class, and gender.

Universalizing also functions to embrace an assimilationist liberal ideology that only serves to prop the dominant cultural perspective through integration, such as favoring speaking Dominant English over native languages (Banks, 2008). Rather, Banks (2008) favors a differential conception of citizenship that engages in recognizing and understanding how difference especially affects the experiences of marginalized groups. In line with Banks’ critique, sociology scholar Mary Romero (2008) argued for the intersection of critical race theory and immigration studies, critiquing the field for typically focusing on “[t]he preoccupation with assimilation results in accepting White, middle-class standards as the norm” (p. 25).

While many scholars take up complicating the idea of “cultural citizenship” and “liminal legality” within the context of undocumented youth identity and schooling (Gonzales, 2011; Gonzales & Chavez, 2012; Gonzales et al, 2015; Mangual Figueroa, 2017; Ellis & Chen, 2013; Flores, 2016; Murillo, 2017), few have contended with how the racialized experiences of undocumented students also impacts how their cultural citizenship situates them within the United States. Following Banks (2008) and Romero (2008), this paper seeks to complicate the educational experiences of undocumented students and how schools as institutions are used to construct these differential experiences through a racialized perspective.

### **Reframing Citizenship**

*Plyer v. Doe* (1982) provides some implication of how the Supreme Court conceptualized citizenship within the context of public education. Although the Supreme Court does not further define what “good citizenship” (as Justice Brennan quoted from *Brown v. Board of Education*) constitutes, they state, “By denying these [undocumented] 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” (*Plyer v. Doe*, 1982). Thus, it may be presumed that part of the foundation of *good citizenship* is the ability to participate and contribute within civic institutions, which the Court argues is barred from undocumented children if they are unable to access to education.

Perhaps undergirding how *Plyer v. Doe* (1982) constructs citizenship is the implication that citizenship is *more than* legality; instead, citizenship becomes a loosely defined entity that plays a key role in what it means to participate within a democratic society. Rather than a binary of citizen vs. noncitizen, illegal vs. legal, documented vs. undocumented, citizenship becomes a

complicated space guided by varying and simultaneous levels of inclusion and exclusion that determines one's belongingness within a nation, and more specifically within the United States (Menjívar, 2006; Gonzales et al, 2015). However, *Plyer v. Doe* (1982) does spend a considerable part of the case negotiating the legality of whether an "illegal alien" status is covered under the Equal Protections Clause of the Fourteenth Amendment, which claims, "no State shall 'deny to *any person within its jurisdiction* the equal protection of the laws" (emphasis in original, quoted in *Plyer v. Doe*, 1982). The debate in itself becomes whether or not "*any person within its jurisdiction*" is about *anyone* within the boundaries of a state, regardless of legal status and/or presence, or if jurisdiction only applies for those who are legally present.

The court moves on to say that, "Legislation directing the onus of a parent's misconduct against his children does not comport with fundamental conceptions of justice" (*Plyer v. Doe*, 1982) as a method of shifting the responsibility of the "illegal alien" status from undocumented children who "can affect neither their parents' conduct nor their own status" to parents and/or legal guardians and therefore temporarily alleviating them of the responsibility of carrying that status. However, as these undocumented youth enter adulthood, they must navigating "learning to be illegal" (Gonzales, 2011). Thus, we see that while *Plyer v. Doe* (1982) does not necessarily offer a definitive idea of how citizenship is conceptualized, at the very least *legal status* becomes nuanced, which feeds into how liminal legality becomes constructed (Menjívar, 2006). Furthermore, by taking great pains to note that undocumented children are not necessarily implicated in their "parent's misconduct," the Supreme Court shows apparent restraint in reclassifying undocumented children as "illegal aliens," further adding to their liminal status.

*Liminality & Cultural Citizenship*

Many scholars whose work focuses on undocumented immigrants have made careful strides to note that citizenship is not merely legal status; notably Cecilia Menjivar (2006) theorizes the in-between status of individuals who are neither “fully legal” nor “fully illegal” in the court of law. Menjivar (2006) writes about the complicated and uncertain legal status of Salvadoran and Guatemalan immigrants, some of who qualify for Temporary Protect Status (TPS), and while granted the right to work and live in the United States, are unable to access social services.

Similarly to this, undocumented students are granted access to K-12 public education, and so are given educational access and inclusion (Gonzales, 2011). However, they are unable to access particular services like federal financial aid, and thus may need to rely on academic success in order to receive and maintain private aid (Flores, 2016), though within the last two decades, many states, like California (Gonzales, 2011; Gonzales & Chavez, 2012), have enacted legislation to provide in-state tuition and/or financial aid to undocumented students. In contention with this lack of access, Mangual Figueroa (2017) delineates the difference that legal citizenship provides a form of juridical legitimization, while cultural citizenship is tied to a sense of belonging through participation in civic life. Many undocumented youth often address how they grew up in the United States yet find themselves frustrated by the legal limitations they encounter as they grow older, ultimately encountering a suspended adulthood (Gonzales, 2011)

Citizenship as constructed within the domain of education is complicated, but many scholars have worked to nuance these conversations, through ethnographies that detail the everyday lived realities of undocumented students as simultaneously included and excluded (Gonzales, 2011; Flores, 2016; Gonzales & Chavez, 2012; Buenavista, 2018; Dao, 2017;

Gildersleeve & Ranero, 2010) to analyses of the agentic methods wherein undocumented students make choices of when to remain silent and when to disclose (Ledesma, 2015; Mangual Figueroa, 2017; Murillo, 2017). College access and retention often play a significant role as well (DeAngelo et al, 2016; Ellis & Chen, 2013; Sahay, et al, 2016; Suárez-Orozco et al, 2015), particularly in that for undocumented students with postsecondary educational aspirations, an unawareness of their legal status leads to financial aid inaccessibility, inability to confirm residency, and even a lack of knowledge and awareness of the different statewide policies that may ease that inaccessibility (Gonzales & Chavez, 2012; Murillo, 2017; Flores, 2016). The limitations of cultural citizenship with out a legalized status lead Gonzales and colleagues (2015) to say, “And though meaningful, [undocumented students’] participation in schools neither suspends their undocumented status nor guarantees broader societal integration, social membership, and opportunities for civic and political engagement” (p. 320).

### **Undocumented Urban Interstitial Spaces**

Sociologist Thomas Swerts (2017) makes the argument for the consideration of what he calls *urban interstices*, “the spaces in between legality and illegality, visibility and invisibility and formality and informality that allow unrecognized actors to simultaneously stay ‘out of sight’ and ‘be seen’” (p. 381). Accordingly, Swerts (2017) classifies schools and universities as an urban interstitial space, arguing that due to the partial inclusion of undocumented students, these institutions can provide pockets of “safe spaces” wherein students are ensured a “certain level of comfort, secluedness, and invisibility in order to convince others that participation is safe” (p. 384). The site of schooling becomes a sort of “backstage,” where undocumented students engage in a political training, experimentation, and innovation that becomes

foundational to the performative “frontstage” political work of activism within urban interstitial spaces as a stage (Swerts, 2017). This kind of participation within schooling institutions and in urban spaces can be read as another kind of cultural citizenship, with undocumented students becoming reframed not merely as victims of policies that happen *to* them, but as critical players in how these policies are received and how they engage with what effects their everyday lives. “These legal and spatial ambiguities [provide] symbolic cracks and openings for the rise of undocumented youth activism” (Swerts, 2017, p. 385).

Just as Swerts makes the case for how schools as interstitial spaces provide an opening for civic participation through activism, Mangual Figueroa (2017) addresses how the immigration law system and the public school system operate to “simultaneously integrate and isolate classes of children based on a variety of factors including legal migratory status” (p. 489). Ultimately, *Plyer v. Doe* creates a “don’t ask, don’t tell” policy, wherein educators are encouraged to not ask about legal status and students are discouraged from addressing it, thereby creating a palpable space of silence (Mangual Figueroa, 2017). However, this silence can be read as a key interactional resource and thus reframed as agentive and act of survival, with Mangual Figueroa’s (2017) research focusing specifically on elementary-age children interacting in a classroom with their peers.

On a relational level between undocumented students and institutional agents, Murillo (2017) focuses on how school structures support or limit educational trajectories. According to Murillo (2017), institutional agents play key roles in providing resources, support, and opportunities that are not accessible to everyone; institutional agents can act in ways that benefit marginalized students, or in ways that reify hierarchal social structures within schools. Thus, while undocumented students have some degree of agency to create and define interstitial spaces

within the structure of schooling (Swerts, 2017) they are also engaged within a power dynamic between institutional agents and themselves, where the decision to disclose (Murillo, 2017) or remain silent (Mangual Figueroa, 2017) impacts the kinds of responses, support, and/or services they may possibly receive. The lack of verbal address does not negate what exists and takes up spaces in undocumented students' everyday realities and thus there are long-term implications to how cultural citizenship in itself is only conditionally existent and are often most reliant on how those in power choose to include and/or exclude at any given moment.

### **Assimilation within School Institutions**

In a large-scale study done by scholar Roberto Gonzales (2011; Gonzales & Chavez, 2012; Gonzales et al, 2015) between 2003 and 2008, 150 undocumented 1- and 1.5 generation undocumented youth in Southern California were interviewed on their experiences of “learning to be illegal.” Gonzales’s (2011) study does address assimilation to indicate how schools become primary sites of socialization, where these mechanisms are “also powerful catalysts for promoting the acculturation processes of the children of immigrants” (p. 604). However, primarily due to the scope of Gonzales’s (2011) research, this assimilative process is not necessarily taken up and critiqued; rather, he looks at life-course scholarship, which is research that looks specifically at different lifetime periods (such as childhood, adolescence, adulthood), in order to assess how the experiences of undocumented youth diverge from their documented counterparts because of the shift from protected status through legitimization in public education to illegal status through restrictions from many “milestones”, such as getting a driver’s license, applying for postsecondary schooling, and getting jobs.

Of course, of note within Gonzales's (2011) study is that this was done prior to the policy memo that institutionalized Deferred Action for Childhood Arrivals (DACA), wherein so long as particular conditions were met, undocumented youth were given temporary social security numbers, relief from deportation, and two-year renewable work permits (Gonzales et al, 2014). In a survey implemented in 2013 of the short-term effects of DACA, Gonzales and colleagues (2014) tentatively found that DACA did indeed reduce some challenges that undocumented immigrants encounters; however, they also argued that when intersected with socioeconomic status (SES), they found that those with a lower SES still accessed less benefits than those with a higher SES. Interestingly, in a study that focused on the experiences of undocumented Asian Americans, education scholar Tracy Lachica Buenavista (2018) noted that Asian Americans had a higher DACA approval rate, though they often underutilized DACA and were thus less likely to apply. In the some of the studies that were written post-DACA, none have significantly addressed whether or not DACAMENTATION<sup>3</sup> impacts inclusion and/or belongingness for undocumented students.

In other studies, just as Gonzales does (2011; Gonzales & Chavez, 2012; Gonzales et al, 2015), Ellis & Chen (2013) also focus on undocumented identity, with specific attention to the salience of bicultural identity for undocumented college students, as does DeAngelo and colleagues, who also look at undocumented activism (similarly to Swerts, 2017). Several other studies focus on college access (Gildersleeve & Ranero, 2010; Flores, 2016; Murillo, 2017; Cortes, 2013). Mangual Figueroa (2017) and Murillo (2017) address the aforementioned moves to disclosure/silence that undocumented students engage in. Two studies I found specifically look at the experiences of undocumented Asian American students (Buenavista, 2018; Dao,

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<sup>3</sup> DACA + un/documentation = DACAMENTATION

2017), whereas most other studies look at the experiences of undocumented Latinx student populations, with many coming specifically from Mexico.

To what extent does the scope of the literature this paper pursues on undocumented students take up the implications of assimilation into the cultural mainstream? Scholars take up an analysis of cultural citizenship as a tool for acculturation used to perpetuate a sense of belongingness. There seem to be implications around having legal status as bringing about a sense of “belongingness,” but how do scholars negotiate the different ways students become marked as Other, often through the collusion of not only nationality, but of race, gender, ability, sexual orientation, and socioeconomic status (in addition to other systems of power unnamed in this text)?

### **The Racialized Experiences of Illegality**

In consideration of the assimilative and meritocratic nature of schooling in the United States, education scholar Leigh Patel (2015) provides a critique of deservingness that underpins immigrant narratives, with attention to undocumented student narratives. Patel (2015) argues that what emerges when we perpetuate this discourse are “tropes of innocence, youth, and non-criminality” (p. 11) that are leveraged against different groups to maintain a larger settler colonial structure. That is to say, the critique lies in the act of positioning undocumented students as deserving because they are “DREAMers<sup>4</sup>” or “have done everything right,” while criminalizing their families (think of how *Plyer v. Doe* positions the “misconduct of parents” in

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<sup>4</sup> This term has been critiqued, but memorably at an UndocuAlly training I attended over a year ago, the facilitators (both of whom identified as undocumented Latinas) said, “Calling [undocumented students] DREAMers assumes that our parents and families don’t have dreams.” This term in itself has been taken from the Development, Relief, and Education for Alien Minors (DREAM) Act, which, if passed, would provide a pathway for legal residency and citizenship for immigrants who illegally came to the U.S. as minors. This legislation, first introduced in 2001, has been reintroduced and failed to pass in Congress several times.

relation to their children). Furthermore, as im/migrants (regardless of status) cross national borders, they inevitably enter what Eve Tuck and K. Wayne Yang (2012) call the triad structure of the settler-native-slave that undergirds the United States. This triad structure outlines European contact (settlers) with native peoples that resulted in the process (rather than event) of settler colonialism that led to the institutionalized erasure of indigenous people, and the propagation of Atlantic Slave Trade that resulted in the profoundly dehumanizing use of chattel slavery to profiteer off the labor and dehumanization of African peoples taken from their own lands (Tuck & Yang, 2012). More explicitly, Tuck & Yang (2012) say, “We are referring here to the colonial pathways that are usually described as ‘immigration’ and how the refugee/immigrant/migrant is invited to be a settler in some scenarios, given the appropriate investments in whiteness, or is made an illegal, criminal presence in other scenarios” (p. 17).

Scholars have devoted studies on how schools are implicated as White, settler structures that prop and maintain Whiteness (and other normative structures) through socially regulatory methods that often result in negative experiences from minoritized student populations (to name a few: Lewis et al, 2001; Solórzano, 1998; Langer-Osuna, 2011; Delpit, 1988; Ladson-Billings & Tate, 1995; Leonardo, 2004). Ethnic studies scholar Dylan Rodríguez (2012) critiques the academy as founded on racial/colonial genocide that, “illustrates the systemic logics, institutional techniques, rhetorics, and epistemologies of violence and power that undergird the academy’s racial and colonial foundations” (p. 809) and that “some of us are subject to eviction and evisceration, alongside the surveillance, discipline, and low-intensity punishment that accrues” (p. 811).

Just as Rodríguez critiques higher education’s foundation, arguably a similar logic can be applied to K-12 public education, wherein Black and Brown bodies are often rendered deviant

and criminal, often resulting in higher rates of in-school punishment<sup>5</sup>. In Buenavista's (2018) study of undocumented Asian/Americans through a critical race theoretical approach (one of the only studies to explicitly use Critical Race Theory), she examines how carcerality, or how the threat of criminalization and mass deportation for undocumented immigrants (and other punitive immigration laws and policies), is central to understanding the experiences of undocumented youth. Similar to carcerality, Gonzales & Chavez (2012) develop the idea of abjectivity for undocumented students, which integrates subjectivities with Judith Butler's theorizing of the abject, or that which is excreted, "cast away" or expelled from the body of the nation. Thus, it is important to critique the structure that assimilates and acculturates undocumented students into cultural citizenship and conditional belongingness when incarceration and abjectivity remain everyday threats; thus, perhaps the question becomes: cultural citizenship and belongingness to what ends? Educational access and policymaking (especially reform policies) does not necessarily transform institutional structures that are meant to punish and/or exclude, creating a pipeline that affirms and rewards "good" behavior, while abjecting and casting away what does not "fit."

Just as Romero (2008) argues for a stronger intersection of critical race theory and immigration studies, I believe that a stronger critical race theoretical approach is needed to analyze the experiences of undocumented students within school institutions. Arguably, scholars also need a critical Whiteness theoretical approach to analyze how schooling institutions operate on White racial hegemony (Leonardo, 2004) and an examination of how schools and their institutional agents are implicated by and complicit to White supremacy. Focus on how

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<sup>5</sup> While the scope of this paper does not look at research on school discipline and Black and Black students, a brief search yields reports such as this that show the prevalence of this narrative of overrepresentation of Black and Brown students suspension rates: <https://www.brookings.edu/research/2017-brown-center-report-part-iii-race-and-school-suspensions/>

undocumented students receive educational access and/or resources without a critical examination of the ways that institutional agents choose whom to provide resources and/or access to do not take into account how we as institutional players also take up a significant role in the gatekeeping of these resources and information.

One could argue that by focusing on Whiteness, this ultimately serves to reify and/or center Whiteness as normative. However, it is significant to note that in all the papers I did read on undocumented students, none focus at all on undocumented European immigrants. This in itself has historical implications and signifies that there is a presumption of who *is* undocumented and who *isn't* undocumented, or who *is* or *is not* il/legal. History scholar Mae N. Ngai (1999) provides a critical analysis of how the Immigration Act of 1924, which allocated quotas based on national origin, had profound impact on the construction of race. The implication tying quotas to “national origin” is related to the preferential treatment of peoples of European (and particularly of Northern and Western European countries) origins and the discriminatory treatment of people whose national origins are from Asian or Latin American countries (Ngai, 1999). Interestingly, Ngai (1999) also addresses how the Immigration Act of 1924 had a significant effect on the racial formation of Mexican/Americans, who although were not subject to quotas, were subject to restrictions based on other policies, including the development of Border Patrol to mitigate Mexican immigration. Thus, even in the 1920s, “‘Illegal’ became constitutive of ‘Mexican,’ referring, not to the citizens of Mexico, but to a wholly negative racial category, which comprised both Mexican immigrants and Mexican Americans in the United States” (Ngai, 1999, p. 91).

Furthermore, when race and undocumented status are simultaneously taken into account, Buenavista (2018) addresses how undocumented Asian/Americans, though subject to much of

the same forces that non-Asian (i.e. Latinx) undocumented student immigrants also face, will sometimes position themselves as superior. One student in Buenavista's (2018) research says that he and his family "came [to the United States] the *right* way [emphasis added]. We had visas. We didn't enter illegally" (p. 87). This in itself also speaks to the argument Tuck & Yang (2012) make that when im/migrants come to the United States, they enter the settler-native-slave triad structure, which in itself is about the racial/colonial [genocide] structure (Rodríguez, 2012), and are thus also implicated in how these structures operate to maintain a racial and colonial hegemony. Additionally, the experiences of undocumented Black im/migrants<sup>6</sup> is also obscured within research and thus there is a lack of analysis on the experiences of the intersection of how undocumented status and anti-Blackness interact with one another to also create a kind of "dual liminality" (Dao, 2017, who conceptualizes this to think about how undocumented Asian Americans exist in a dual liminality as well).

### **Implications**

One of Critical Race Theory's tenets is the centrality of experiential knowledge and an emphasis on the use of counterstorytelling (Solórzano & Yosso, 2005), thus it is still important for scholars to do the work of opening spaces for undocumented youth (as well as other racially minoritized and marginalized populations) to share their lived experiences. However, there is a danger in falling into a discourse of deservingness (Patel, 2015) that only serve to reify structures that wind up propping a good immigrant/bad immigrant narrative (Kibria et al, 2018) as a way to categorize and stratify different groups of people. Increasing educational access without taking into account whether and how these structures actually operate to equitably support minoritized

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<sup>6</sup> Some news outlets have reported on undocumented Black im/migrants, for example: <https://www.theatlantic.com/politics/archive/2017/12/the-double-punishment-for-black-immigrants/549425/>

student populations (specifically undocumented students within the scope of this paper) does little to redress the future harm that institutions will continue to perpetuate, especially if institutions continue to uphold a meritocratic and assimilative stance toward education without negotiating the implications of propping a continued myth of meritocracy. I cannot help but think about how the assimilative nature of schooling still produces a sense of abjectivity, a sense of unbelongingness that as we increasingly intersect it with nationality, gender, sexuality, still exhausts and fatigues minoritized students, who must negotiate their own experiences of abjectivity.

Scholars, researchers, teacher educators, educators (both in schools and in out-of-school contexts), and even activists and organizers, or generally anyone with a vested interest and commitment to equity, regardless of position, must contend with our social structures and the ways we are implicated in the maintenance of these structures; thus as much as we are capable of reification, we are also capable of acts of disruption. Education scholars Lois Weis and Michelle Fine (2012) introduced the necessity of utilizing critical bifocality as a way to understand circuits of privilege and dispossession, a “a theory of method in which researchers try to make visible the sinewy linkages or circuits through which structural conditions are enacted in policy and reform institutions as well as the ways in which such conditions come to be woven into community relationships and metabolized by individuals” (p. 174). Said another way, critical bifocality calls for simultaneous attention to be paid to the macro (global and systemic) and micro (local and everyday) structures and how these structures impact lived realities, through the circuits of privilege and/or dispossession that simultaneously benefit and marginalize us.

### *Limitations*

By no means is this paper truly a comprehensive look into how undocumented students have been narrated in the field of education scholarship, and thus it is absolutely feasible that scholars I have not addressed here have been making this move to integrate a more intersectional analysis of legal status. Not only that, but the onus of this paper turns on the presumption that the reader buys into race (and even settler colonialism to an extent) as being the central construct and organizing logic we must contend with, as I do. For myself as a woman of color, specifically as a first generation Filipina American U.S. citizen in the Diaspora, I will most often center race, gender, and class in my critical scholarship, meaning that there are other constructs that I will fail to center and is the result of my own privileges as cis- and able-bodied, non-Black person of color. This is why diverse perspectives, when legitimized within a space as more than just “diversity of thought,” are necessary to critical dialogue and scholarship.

### **Future Considerations**

Immigration is and will continue to be an ongoing topic of conversation, whether in scholarship or news media, and as community organizers and activists continue to build resistance against the state-sanctioned criminalization of immigration and separation of families. Within the past few weeks of May and June 2018, there has been strong, vocal outcry and criticism against the current administration’s forced separation of immigrant children from their families who’ve illegally crossed the border<sup>7</sup>. In 2017, I visited the Northwest Detention Center (NWDC) in Tacoma, WA due to a call for allies sent out by the grassroots organization NWDC Resistance, in support of a hunger strike that several female-identifying detainees were carrying

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<sup>7</sup> One such article can be found here: [https://www.washingtonpost.com/local/inside-casa-padre-the-converted-walmart-where-the-us-is-holding-nearly-1500-immigrant-children/2018/06/14/0cd65ce4-6eba-11e8-bd50-b80389a4e569\\_story.html?noredirect=on&utm\\_term=.c70ae2dd079c](https://www.washingtonpost.com/local/inside-casa-padre-the-converted-walmart-where-the-us-is-holding-nearly-1500-immigrant-children/2018/06/14/0cd65ce4-6eba-11e8-bd50-b80389a4e569_story.html?noredirect=on&utm_term=.c70ae2dd079c)

out for better working and living conditions within the detention center. In April 2018, after a major Immigration and Customs Enforcement (ICE) workplace raid in Morristown, TN, hundreds of children were left without their parents<sup>8</sup>. In early June 2018, a direct action against ICE in Seattle, WA took place that resulted in nine anti-ICE activist arrests<sup>9</sup>; they were later released, especially after a large grassroots response demanding for their release. In California, 43 Cambodians, many of whom were reported to be refugees, were deported back to Cambodia<sup>10</sup>. Just recently, Secretary of Education Betsy DeVos was criticized for responding to a question of whether or not school administrators should report to ICE if they learn a student and/or their family is undocumented; she had responded it was ultimately up to schools and local communities to decide, which many viewed as in contention with the ruling of *Plyer v. Doe*<sup>11</sup>.

The threat of second-class citizenship and/or the maintenance of an underclass have often been leveraged as an ethical and moral imperative to push for the redress of inequities within institutions, with schools most often becoming the sites of redress. However, when we speak to the multiple underclasses that are created in an increasingly segmented and stratified society that is organized by the collusion of White supremacy, patriarchy, cis-heteronormativity, and neoliberalism without acknowledgement how these systems rely on one another to maintain power, then who do we really serve and who do we really protect? Thus, if there is an ethical imperative to abolish (Rodríguez, 2012), how may we also open up sites of possibility to *liberate* and *transform*, and furthermore, are schools a catalyzing space for such work?

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<sup>8</sup> See a news report here: <https://www.newyorker.com/news/dispatch/in-rural-tennessee-a-big-ice-raid-makes-some-conservative-voters-rethink-trumps-immigration-agenda>

<sup>9</sup> <https://southseattleemerald.com/2018/06/05/anti-ice-activists-lock-down-and-block-traffic-on-2nd-ave/>

<sup>10</sup> See here for more information: [https://www.huffingtonpost.com/entry/cambodians-deported-trump-immigration\\_us\\_5ac77dd9e4b07a3485e3da6c](https://www.huffingtonpost.com/entry/cambodians-deported-trump-immigration_us_5ac77dd9e4b07a3485e3da6c)

<sup>11</sup> See here for the Southern Poverty Law Center's response to DeVos's comments: <https://www.splcenter.org/news/2018/05/23/splc-statement-devos%E2%80%99-suggestion-schools-can-report-undocumented-students-ice>

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