

Q&A: Undocumented Nursing Students in California

This document focuses on California policies, Pre-Health Dreamers (PHD) encourages individuals from other states to use it as a foundation for research and advocacy within their regions.

The information below regarding Individual Taxpayer Identification Numbers (ITINs) and background checks can be implemented in any state. However, policies supporting undocumented students and professionals vary; some states or programs may impose additional barriers.

Can undocumented students enroll in a nursing program in California without a Social Security Number (SSN) or immigration status?

Yes, it is possible. In California, legislation prevents higher education institutions, including nursing programs, from denying admission to students based solely on their immigration status. California Education Code § 66270 protects individuals under the following immigration categories, and others, from discrimination when applying to California nursing programs:

- Undocumented individuals without employment authorization or an SSN
- Deferred Action for Childhood Arrivals (DACA) recipients
- Temporary Protected Status (TPS) holders
- Individuals with pending asylum cases, U-Visas, T-Visas, or other "in-between" statuses
- Students with T or U visas

While immigration status does not preclude admission, students must still meet all standard admission requirements, such as completing prerequisite courses, meeting GPA thresholds, and passing entrance exams.

What barriers do students face without a Social Security Number (SSN)?

Although nursing programs cannot deny admission based on immigration status, undocumented students may face challenges in completing clinical requirements if they lack an SSN.

To provide nursing students with clinical experience, nursing programs must form partnerships with hospitals and clinics facilitating clinical rotations. However, clinical sites set the onboarding requirements that students must meet, and sometimes, that requirement is to have an SSN, creating obstacles for some undocumented students.

Some clinical sites, however, will accept an **Individual Taxpayer Identification Number (ITIN)** in place of an SSN. [Click here](#) to learn more about ITINs and nursing programs or visit phdreamers.org/resource-nursing

Additional challenges include:

- Nursing programs may not know how to advocate for undocumented students when hospitals refuse to onboard them due to a lack of an SSN.
- Fear of losing partnerships. This fear prevents nursing programs from advocating on behalf of undocumented students.
- Lack of awareness of alternative identification methods, such as using a student identification number for onboarding.

What students can do:

- **Ask nursing programs about their clinical partners** and whether an SSN is required.
- **Inquire if the program will help educate and advocate** for students who lack an SSN.
- **Seek alternative clinical placements** within the program's network of contracted hospitals.
- **Educate programs about ITINs and alternative onboarding options** to support undocumented students.

To improve student access, nursing programs should proactively develop partnerships with clinical sites that welcome undocumented students and use alternative identification methods for onboarding.

What is an ITIN?

An **Individual Taxpayer Identification Number (ITIN)** is a tax processing number issued by the **Internal Revenue Service (IRS)** for individuals who do not qualify for an SSN but must file taxes.

An ITIN **does not** provide employment authorization, eligibility for Social Security benefits, or legal immigration status. However, undocumented individuals **with an ITIN can:**

- Apply for a **professional nursing license** in California and other states with similar policies. [Click here](#) to learn more about licensing in other states or visit phdreamers.org/licensure
- Take the National Council Licensure Examination (NCLEX) exam
- File taxes, apply for loans, and more

Q&A: Undocumented Nursing Students in California (Cont...)

Resources for ITINs:

- Nursing programs should familiarize themselves with ITINs to provide accurate guidance to students.
- Students should consult their campus **Dream Center** or **Undocumented Student Program** for assistance with the ITIN application process.
- **USCIS does not issue ITINs**, and referring students to USCIS for an ITIN may cause confusion or can have consequences for a student.

Are there protections for undocumented students in California nursing programs?

Yes. **California Senate Bill (SB) 1139 (Lara, 2016)** prohibits hospitals and clinical sites from denying undocumented nursing students access to unpaid "healing arts" training programs based on their immigration status. This includes **unpaid clinical experiences** required for completion of the nursing program.

To be protected under **SB 1139**, students must have an **ITIN**.

California Education Code § 66270 also ensures that undocumented students can pursue higher education and the programs within these institutions, such as nursing and other health-related programs, without discrimination. Students must still meet other admission requirements such as GPA, prerequisites, etc.

Can undocumented students obtain a professional nursing license without an SSN or Employment Authorization Document (EAD)?

Yes. **SB 1159 (2014)** allows individuals with an ITIN to obtain professional licenses in California regardless of immigration status, provided they meet all educational and training requirements.

Undocumented students can:

- Take the **NCLEX exam** using an ITIN instead of an SSN (Reference: [BRN Examination Application Fees & Instructions, page 4, section IV](#)).

Can undocumented students be employed as nurses without an SSN or EAD?

No. **SB 1159** and **SB 1139** do not provide employment authorization (EAD).

Without an SSN and EAD, individuals cannot be employed as traditional nursing staff. However, they may explore alternative options, including:

- **Sole proprietorship**
- **Freelance work & independent contracting**
- **Entrepreneurship**, with business opportunities increasing based on the type of nursing degree

Why do nursing programs and clinical sites block undocumented students?

Common reasons include:

- There is a **lack of awareness** that background checks can be conducted without an SSN (using LiveScan fingerprinting). [Click here](#) to learn more about California Department of Justice (DOJ) Background Checks and Undocumented Students.
- An **increase in awareness** may be needed. Clinical sites have implemented identical onboarding processes for students and employees, not differentiating between paid employees and non-paid students (volunteer, clinical experience, etc.). Because of this, undocumented students are subjected to additional unnecessary requirements for educational purposes.
- **Clinical sites may be limited** to training, reassessing, and regularly updating company policies as needed.
- **Being out of compliance**. Nursing programs and clinical sites must follow many rules and regulations to comply with regulatory boards. Because of this, programs may be hesitant to change processes without thorough research and permission.
- **Concerns about losing clinical partnerships** as a result of advocating for undocumented students.

How can nursing programs and clinical sites better support undocumented students?

- **Develop early and proactive clinical partnerships** with facilities that accept undocumented students.
- **Train faculty and staff** on ITINs, background checks, and legal protections for undocumented students.
- **Advocate for policy changes** to ensure fair access to clinical rotations.
- **Foster transparent communication** so students understand clinical site requirements before enrolling.
- **Create a structured referral process** from nursing programs to campus **Dream Centers** and **Undocumented Student Programs** to assist students.

Final Call to Action:

- Students should **initiate early conversations** about clinical partnerships and advocacy support with nursing programs.
- Hospitals and clinics should **review background checks, SSN requirements, and ITIN policies** to ensure they comply with policies such as **SB 1139** and are not inadvertently blocking qualified students from completing their education.
- Nursing programs should **familiarize themselves and their clinical partners** with how they can support undocumented students in achieving their career goals.

By working together, institutions can create an inclusive and supportive environment that allows undocumented students to complete their education and contribute meaningfully to healthcare.