"Students Want to Feel Safe, Safety Breeds Inclusivity": How Universities Implement Data Collection Methods for Undocumented Students

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Abstract

Inclusivity in data reports for undocumented students can be difficult to achieve. By nature of those students' status and livelihood, there is contention among academics and practitioners on whether this is a population that should not be formally tracked or identified, for a variety of reasons. Concerns about tracking arise because of the Freedom of Information Act, which is designed to ensure the public's access to government records. This law motivates higher education institutions to not document immigration status in an effort to protect students' identities, although the Family Educational Rights and Privacy Act policy emphasizes the protection of student data and privacy. Nevertheless, the fear of future policies that could implicate undocumented students has created an impermeable hesitancy among higher education administrators and undocumented students. Drawing from undocumented critical theory to center the varied experiences of undocumented (current and former) students, this study surveyed the study's authors and other higher education professionals to identify strategies that also center those most directly impacted. This article details existing strategies that intentionally and safely center undocumented students in replicable and standardized data. We found that major university

systems used a combination of three strategies: we found that university officials shared significant success in data collection when they (1) developed and institutionalized safe data collection methods specific to their population, (2) hired intentional and informed staff to focus on this population, and/or (3) expanded existing services such as scholarships and resources to create a safe space for students to share their status. Although not all practices may work on a single institution, it is the authors' hope that intentional and safe practices will breed inclusivity.

INTRODUCTION

While it is the responsibility of higher education institutions to identify creative and safe avenues for inclusion, no research or example studies of this effort exist. Since institutions rely heavily on data for funding and for prioritizing student-facing initiatives, undocumented students are often not included in these metrics. As a result, students toggle with an expectation to forgo inclusivity in exchange for their own safety (Mangual Figueroa, 2017). This situation emphasizes the importance of exploring and implementing safe and inclusive data practices. Without an informed and safe higher education administrator, the vulnerability of their status discourages students from disclosing in higher education (Reed et al., 2022). The authors of this article sought to address this gap in the research with the extensive work they have done in creating safe and inclusive data collection methods.

Therefore, the structure and methodologies of our article draws from our experiences and the experiences of other scholars who have incorporated their own lived and professional experiences as informed methods of practice. In particular, we drew from Nakae and colleagues'

(2022) chapter in *Critical Praxis in Student Affairs* titled "Critical Praxis with Undocumented Students in Medical Education." This chapter positions the authors' experience of "conscientization" as the foundation to their work and efforts as practitioner–activists cocreating resources with undocumented students who are navigating the medical field.

Similarly, our work is grounded in our personal and professional narratives. Drawing from our own experiences as well as from a survey of other practitioners, we sought to document strategies that have allowed universities to more accurately and more safely estimate the undocumented student population. Within each of these strategies, higher education staff implemented responsible data use to limit access, deidentify data, and communicate transparency for concerned students and community members. While none of the strategies accounted for every undocumented student, these strategies have resulted in university systems using a truer estimate of their student population, and this in turn has resulted in more funding allocation, more resource development, and more inclusion in strategic roadmaps, while simultaneously protecting students from capricious legislation.

The respondents' reactions to our questions and their apprehension about divulging strategies demonstrates that this is a sensitive topic, but one that it is necessary to explore. Without any existing research or guidance, higher education institutions are often left to their own devices and are hesitant to share strategies that are not tested or grounded in informed research. A continuing scarcity in funding and the politicization of undocumented students emphasizes the importance of research on this delicate but necessary subject.

AUTHORS' NARRATIVES

This article was developed and written by three higher education practitioners and researchers who have personal and professional experience at the intersection of immigration and education. As detailed in the "Methods" section, we initially intended to draw data only from colleagues and collaborators. It soon became clear, however, that our own practices and strategies influenced our writing and our engagement with the data. In a group epiphany, we agreed that our own narratives should be incorporated to include practices in our professional spaces. These are practices that span several states, are long-standing, and are intersectional to our own identities. The following narratives detail the authors' experiences developing inclusive practices for standardized data and expanding services for undocumented students.

Author 1

I immigrated to Boyle Heights/East Los Angeles, California, from Zapopan, Mexico, when I was 5 years old. My family and I originally came on a tourist visa to reconnect with my grandmother. We decided to stay in the United States after our visas expired. As my parents struggled to support my sister and me, there were often conversations about returning to Mexico. These conversations became more common when anti-immigrant legislation created by then-Governor Pete Wilson began to target undocumented youths in K–12. While the legislation was being settled in the courts, my parents continued to prioritize our education as an avenue for social mobility and eventually to U.S. citizenship. After my parents' divorce, my dad continued to raise me and my sister alone, focusing on our education by attending parent–teacher conferences and speaking to our counselors about our immigration status. My dad spoke to my counselors as if our status were not something that should be hidden, but rather as something we needed to communicate to ask for resources. My counselor spoke to us about California Assembly Bill 540 (AB 540), the in-state tuition legislation and private scholarships that could help us afford college at a time before the California Dream Act. Although I would speak candidly to my counselor about my status, it was not something I would speak about with my teachers or classmates. During my time in high school, I knew of only one other student who was undocumented.

It was through my dad's remarriage, which happened right before my sister and I turned 18, that we were able to adjust our status. Upon getting my green card, I shared the news with teachers because the day of my residency interview was the only time I missed class. They expressed how surprised they were that I was undocumented. I also began to share my status with my friends, and learned that two of my closest friends were also undocumented. We were completely shocked that we had never spoken about it to each other. We knew each other's parents and siblings, but even then, we never felt safe enough to share our struggles with our immigration status. We also realized that we could have supported each other and advocated for each other had we known.

I carry that feeling and experience with me in professional spaces I have navigated as I have advocated for undocumented and immigrant student resources. Throughout my time in Arizona, California, Massachusetts, New York, and Washington, DC, my roles in higher education have focused on how we can cultivate a space for undocumented students to access resources, regardless of whether they share their immigration status.

1| Create a proxy that does not use identifiers.

2| Invest in full-time staff who are content experts.

3| Normalize and embed immigrant resources with general resources.

WHO CAN IMPLEMENT THESE STRATEGIES?

These takeaway strategies have been implemented in public universities in states like Arizona, California, and New York. This means that, regardless of the political context, and when implemented safely by a content expert, these practices can be a successful assessment of the undocumented student population at a campus. It is important to cultivate a sense of trust at the campus to encourage participation and, in some instances, self-disclosure.

1. Create a Proxy that Does Not Use Identifiers.

Admission and financial aid offices collect general data questions that can lend themselves to producing a proxy to determine estimates of the numbers of undocumented students at a campus. The use of data from data queries such as a FAFSA submission, country of origin, or Social Security numbers, can provide a sense of how many students could be undocumented or might have a precarious immigration status. Additionally, some campuses have questions about visa types or immigration status that can help this proxy include students with Deferred Action for Childhood Arrivals (DACA), while omitting international students. Importantly, proxies should be developed in collaboration with expert data analysts to remove identifiers that could create a list of possible undocumented students. While a proxy with identifiers could work at a private university that has more autonomy, public universities and their general counsel might

be more likely to submit requests from the federal government.

2. Invest in Full-Time Staff Who Are Content Experts.

These full-time staff can be a point of contact for students is the most effective way to collect data. More importantly, these staff will manage the proxy (Accessible Takeaways, #1), in a safe way. These staff can document unique points of contact and needs through one-on-one interactions and informal data collection from events, programming, and email lists. They would collect the data without identifiers and track what resources are needed, the dollar amounts students access through scholarships, and any barriers that students experience. This strategy has resulted in data that speak to the impact of programming, return on investment, and population sizes. Staff in these scenarios have created an informal tracking document to account for this population, which has proven to be particularly successful in public universities where campuses generally do not track or ask students to self-identify their immigration status. Additionally, these staff could access existing sensitive data they share with leadership at the campus.

3. Normalize and Embed Immigrant Resources with General Resources.

Normalizing resource dissemination to welcome self-disclosure is another method to include undocumented students in data collection efforts. Students hesitate to seek resources that require them to disclose their immigration status. As a result, campuses might assume there are no undocumented students. By sharing resources with undocumented students in general resources in key spaces like admission, financial aid, and career

opportunities, however, students understand that the campus has some knowledge base. This strategy has resulted in students seeking additional information, leading to a new level of awareness about the needs of this population. This is particularly important considering that non-Latin/x students are less likely to reveal themselves as undocumented and to seek resources for their immigration status. Normalizing these conversations across all institutional spaces can allow Black, Asian, and trans undocumented students to connect with spaces they already identify as safe for one of their identities, and to ask for more resources. Ultimately, this allows the campus to account for possible undocumented students without collecting identifiers through self-developed tracking tools.

Author 2

As a former higher education administrator, it was important for me to find ways to provide services, resources, and tools for undocumented students. In doing so, tracking those students was always critical to the support I could provide. Whether the data were financial, academic, social, or emotional, they were key for me to know how many students I was advocating for. Without the data, senior leaders, donors, faculty, and staff had an arduous time finding funds to allocate to programs and services. As a former undocumented student myself, however, I also understood the nuances of fear, contention, and anxiety around my status being formally documented.

I was born in a rural village in Jamaica, and migrated to the United States as an adolescent. In high school, I learned I was undocumented, a tough reality that shook my world. Without much knowledge of what it meant to be undocumented, I hid my status from teachers, counselors, and friends. Fortunately, I

had a counselor who provided a safe space for me to disclose my status. With his support, I received a sizable academic scholarship from California Lutheran University, and, because I lacked any other financial support, members in the administration and board of regents personnel supported my room and board expenses.

Within 3 years of starting my undergraduate education, the DACA policy was announced. DACA opened many doors for me, one of which was the ability to continue my higher education. While working multiple jobs, I went on to earn my master's in public policy, and later my doctorate in higher education. As a young professional, I served as a teacher, college counselor, and supporter of other marginalized and underserved students. After 7 years in the K–12 system, I transitioned to higher education, where I worked as director of undergraduate admission, with a personal mission to increase access to higher education for undocumented and other marginalized students. I left higher education in 2023, and now work at the intersection of higher education and immigration at the Presidents' Alliance on Higher Education and Immigration. Throughout my many professional roles, I have learned how to safely include, account for, and support undocumented students, while simultaneously understanding and balancing the fear of students, administrators, and families regarding data collection of this vulnerable population. Similar to the findings from this study, my personal and professional experiences have provided me with insight to posit to higher education professionals, students, and faculty. Below are three takeaways that higher education leaders, policymakers, practitioners, and students can use when thinking about how to safely track students; these strategies, in turn, are producing programs, support, and services for undocumented students.

1| Code.

2| Hire full-time staff to support undocumented students.

3| Create unique scholarship funds.

WHO CAN IMPLEMENT THESE STRATEGIES?

These takeaway strategies are well suited for small private liberal arts schools in California. Additionally, campuses that classify as a Hispanic Serving Institution or as a religious institution, have ample opportunities to implement some of these strategies. In order to justify additional support for undocumented students, it is important to account for them because data can lead to funding, programming, and support services that would otherwise not be available.

1. Code.

Small private liberal arts institutions can implement coding of undocumented students for the purposes of admission and financial aid. This would mean checking the common application for certain markers that would indicate that the student is undocumented (i.e., place of birth, years in the United States, whether they provide a Social Security number, information about their parents, whether they qualify for the Free Application for Federal Student Aid [FAFSA], etc.). In some cases, students openly disclose their undocumented status via common application or other application services, but in other cases students do not voluntarily divulge that information out of fear of the consequences. Therefore, smaller admission offices can code students before sending their application to the financial aid office. This will allow financial aid officers to know whether students

filed a FAFSA or any other financial aid applications. Institutions can add questions to their sections of the common application that can point them to this information. This type of information helps to provide admission staff with an opportunity to advocate for undocumented students in the financial aid rewarding process. This type of coding will also allow the institutions to have a basic idea of who the undocumented students are.

2. Hire Full-Time Staff to Support Undocumented Students.

Another practice that small private liberal arts schools can use is to hire or assign full-time personnel to focus on and support undocumented students. Admission offices can assign counselors to undocumented students or to recruitment areas that are heavily impacted by undocumented people. Through counselor interactions, there are also additional data on undocumented students that will support expanding services. Student affairs personnel can identify a staff member who could be a point person for undocumented students and make the information visible on the campus website. While some institutions might not have the finances to dedicate full-time staff to undocumented students, having someone who is focused on the population can provide access to the data. Once students feel supported on campus, they will openly seek those supports.

3. Create Unique Scholarship Funds.

Finally, another important strategy for small liberal arts schools is to create unique scholarship funds for undocumented students. To create scholarship funds for undocumented students, admission offices can partner with the university advancement offices and successful alumni who want to support

an undocumented student fund. The scholarship fund would also provide data on how many undocumented students need support at those institutions, and could lead to the expansion of funds and more-inclusive systems and processes.

Author 3

I started my professional journey in 2006 in the California State University system as an admission evaluator and residence specialist. In California, a law providing in-state tuition for undocumented students (AB 540) had passed 5 years before, in 2001. As an admission counselor and residence specialist, I met with prospective students, including undocumented students, some of whom were finding it difficult to navigate higher education.

In 2006 undocumented student programs, research around this topic, and UndocuAlly trainings were minimal, even in California. Grassroots organizations and activists in California had been working with undocumented communities, however, and those training sessions were a great place to learn. Over the years, and through research and conversations with community members, educators, and students, I helped create resources and training that increased the support for undocumented students on campus, then later did the same to provide statewide support.

In 2011 I added to my role and worked for the Educational Opportunity Program, which had just started admitting undocumented students. Even more important, the California Dream Act had been signed into law that year, making state financial aid available to undocumented students. As a residence specialist, admission Educational Opportunity Program counselor, and UndocuLiaison,[1] I worked with the financial aid and admission director to set up the admission and financial aid process for undocumented students. Through this experience, I learned about coding and running processes while ensuring confidentiality and compliance.

Through data collection, we learned that there were more than 800 undocumented students on campus. These data supported our efforts to establish an undocumented student club and Dream Center. Using the on-campus data, our team sent out an email to ask how many students were interested in starting a club for undocumented students, and 75 students showed up to the first meeting.

Everything I learned regarding processes and data collection was through research and collaboration. Students' voices were essential and, thanks to them, we were able to establish holistic support. Without knowing how many students there were on campus, it would have been difficult to prove the impact that funding allocated for undocumented students would have.

In 2019 I was hired as executive director of Pre-Health Dreamers, an organization that serves undocumented students pursuing health-related careers. This organization helps students navigate the obstacles of higher education. In the 18 years since I began my career, I have seen many undocumented students graduate. The support for undocumented students in California and across the country needs to be uplifted, and it is through constant learning, conversations, and advocacy that we can make it happen.

1. An UndocuLiaison is campus-based staff, designated by campus leadership, to include undocumented and immigrant student concerns in their portfolio.

ACCESSIBLE TAKEAWAYS STRATEGIES

1| Use responsible hiring and training.

2| Support directors and administrators.

3| Use partnership and collaboration.

WHO CAN IMPLEMENT THESE STRATEGIES?

These takeaway strategies have been implemented in public institutions over the years, especially in California and in other states where financial aid and/or in-state tuition is available to undocumented students.

1. Use Responsible Hiring and Training.

As institutions move forward in creating support for undocumented students and assessing whether tracking students is beneficial, it is essential to carefully select the staff leading the efforts. Hiring individuals with a background in working with undocumented students, and who understand the extreme importance of confidentiality, is vital in successfully and responsibly collecting and using data. Throughout my career, I have seen coordinators hired solely due to them having a Latinx background, although they frequently lack an understanding of the importance of confidentiality and sensitivity around this population. Even more important, training that reminds staff about the confidentiality of personal information is essential, especially when they work with undocumented students' data. Residence specialists are often individuals who have continuous training, and who have extensive access due to processing immigration documents and coding for tuition purposes. Individuals working with undocumented student data must be held to the same standard. Even more important, as students self-identify,

referring students to specialized individuals is essential rather than referring them without vetting them, and having students disclose their information to untrained individuals.

2. Support Directors and Administrators.

Working with undocumented students requires a high level of specialization. When serving undocumented students, staff will be entrusted with information regarding complex immigration questions that might need third-party intervention, specialization regarding background checks and professional licensure, advocacy, and collaborative efforts among departments. Liaisons, coordinators, and directors leading such efforts should be entitled to and entrusted with access to resources. The support of higher administration and decision-makers for staff to connect with the required resources is vital for those working with undocumented students to serve them appropriately. Serving students appropriately also means accessing the data that allow these individuals to understand the population and connect them with even more support. In-house data, surveys through email lists, and quotes from in-house conversations are all vital in creating support. Students must know that their quotes and non-identifying data are being reviewed but that they are also protected through the Family Educational Rights and Privacy Act (FERPA).

3. Use Partnership and Collaboration.

Given the complexity of undocumented students' needs, it is important to note that no single staff member will be able to provide all the answers a student needs, especially in a larger institution where admission, financial aid, and advising do not work closely together.

Collaboration and partnerships are important to create a safe and welcoming space for undocumented students, a space that promotes well-being, retention, and graduation. For example, holds on student accounts regarding tuition might need a different process and documentation for undocumented students than for students who are U.S. citizens. Because no two undocumented students' personal backgrounds are the same, different situations can require different documentation. At times, problem solving for a student requires creative solutions that require collaboration and buy-in from various departments. It is important for department liaisons working with undocumented students to collaborate to figure out the issues behind the scenes rather than sending the student to solve it on their own. Solving technical and nontechnical issues for undocumented students may need various individuals who have access and know how to solve an issue, possibly including the student's immigration status. Regardless of data collection, collaboration and proper funneling of each student's information is important to avoid ill-advising the student and elongating any issues the student might need to solve.

Administrators and directors must understand confidentiality and access to data and must be able to adequately train support staff who work with this population to meet goals that help retain and graduate students. Although administration does not work with undocumented students every day, liaisons with undocumented students need to have support from their higher-ups to do as required and to be entrusted with accessing data.

Theoretical Framework

We draw on undocumented critical theory (UndocuCrit), a sub theory of critical race theory (CRT). CRT can be traced back to critical legal studies (Kennedy & Klare, 1984), where legal scholars emphasize that law is intertwined with social issues and subsequently social biases. The development of CRT from critical legal studies further interrogated the impact of race in our society (Crenshaw et al., 1995). The application of CRT to both K–12 and higher education scholarship is integral to addressing racial inequities that persist in educational institutions (Ladson-Billings & Tate, 1995; Solórzano, 1998). Inspired by the work of CRT, subcategories were developed to expand on the nuanced epistemologies of socially constructed groups in society, such as tribal critical theory (Brayboy, 2005) and Asian CRT (Gotanda, 1995). Similarly, Aguilar (2021) introduces UndocuCrit, which is rooted in CRT and influenced by forms of CRTs, and is an effort to highlight the nuances within undocumented communities in the United States (Aguilar, 2021). In this article we use UndocuCrit to position the nuanced historical and geopolitical experiences of undocumented communities in spaces where those experiences are often excluded, and expand on existing scholarship that focuses on undocumented student literature. While we use UndocuCrit in this article, we directly link this theoretical framework to lived practices to link our work to the founding tenets of critical legal studies, an important facet of this work (Dixson & Rousseau, 2005). Through UndocuCrit, we are able to integrate not only the authors' lived experiences, but also the existing practices of responsible data use in conversation with institutional research.

In fact, since standardized data for undocumented individuals rarely exist, UndocuCrit has been used to incorporate the narratives and practices for undocumented individuals across research. Within vocational psychology (Cadenas et al., 2018), disability justice (Padilla et al., 2021) and health

equity (Manalo-Pedro et al., 2023), UndocuCrit provides a lens to account for undocumented marginalized narratives and the impact of institutional practices.

While UndocuCrit and DACAdemics and undocumented scholars have made great strides in applying this framework across different fields, there continues to be a need to further incorporate the undocumented student lens. In an effort to bridge the conversation between institutional research and UndocuCrit, we found a similar need: there is no standardized, publicly available, educational data for immigrant students in the United States (Wiseman & Bell, 2022). With the use of UndocuCrit, our article aims to develop alternatives by including our experiences, and those of our colleagues, within higher education, policy, and data creation.

UNDOCUMENTED CRITICAL THEORY IN HIGHER EDUCATION

When exploring the impact of immigration status on educational mobility, scholars have defined *undocumented status* as either a master status (Gonzales & Ruszczyk, 2021; Valdez & Golash-Boza, 2020) or the final straw (Enriquez, 2017). In either definition, undocumented status is a determining factor in access to higher education that can be further augmented by other intersectional identities. It is important to note that the positioning on master status for undocumented students is mainly rooted within the UndocuLatinx perspective, thus possibly not accounting for other groups. This classification emphasizes the importance of UndocuCrit theory in higher education research and practice. It is imperative that looking at the inclusion and practices that impact undocumented students be done with and by directly impacted scholars (Aguilar, 2021). This becomes particularly important when institutions are

largely not trained to be Undocu-friendly (Marcial, 2023). Universities as educational institutions serve as a pinnacle space because of their potential to be a space of inclusion for undocumented students (Gonzales & Carvajal, 2015).

STRATEGIES IN POLICY ENACTMENT

The onset of the undocumented student rights movement shows that policies that help undocumented and other minoritized identities access resources are often not given willingly. In fact, it is always through advocacy and grassroots organizing that policies are passed and enacted by those in power (Escudero, 2020). As a result, policies can include limiting restrictions that exclude certain groups and populations, such as DACA. While DACA was a groundbreaking legislative action, its eligibility criteria favored individuals who arrived at a young age and who had experienced some level of integration into the United States, through either education or labor. Moreover, it favored those who have not been targeted or criminalized by the legal system. Therefore, the policy does not take into consideration that certain communities are more likely to be targeted by the police, and therefore are ineligible. UndocuCrit theory allows us to include the experiences of those most vulnerable and how to navigate and overcome restrictions in policies. Moreover, lived experiences with a precarious immigration status can help prevent complacent policy compliance in policy enactment (Castrellón, 2022). The authors and respondents in this article are actors in higher educational and immigrant justice spaces that are often tasked with creating accessible pathways when policy is either limited or exclusionary.

While the purpose of this article is to include undocumented individuals in standardized data sets, the nature of this experience already limits these data to those who self-identify. We must also be mindful, however, of how even intentional strategy could exclude the incorporation of non-Latinx individuals. For example, the experience at the intersection of immigration and race creates a unique experience for UndocuBlack students, and that calls for our strategies to bear that experience in mind (Hall, 2022; Meitzenheimer, 2020; Russell, 2022; Russell & Cisneros, 2023; Russell & Rivarola, 2023). Asian (Buenavista & Chen, 2013; Cho, 2017), Central American (Zimmerman et al., 2023), and transgender undocumented students (Fernández, 2018), among other statuses, can also be further invisibilized even when the initial effort is to include undocumented students. Through UndocuCrit theory, we hope to include the most vulnerable narratives in order to present practices for inclusive data. Moreover, UndocuCrit theory also provides a framework that allows us to safely and mindfully include individuals, while not exposing individuals who have chosen to not self-identify (Entigar, 2021).

METHODS

Our methods focused on a questionnaire with four open-ended questions. The questionnaire consisted of the following questions:

1| What practices do you have in place to account for undocumented students, to justify expansion and funding, and to build a more inclusive system?

2| What are safety protocols or training you have in place to maintain anonymity of data?

3| Is there something unique about your campus that allows you to implement these practices, protocols, or training?

4| Are there any consequences to breaking protocol and endangering students?

These questions sought to situate the current experiences of immigrant, undocumented, and formerly undocumented higher education professionals, as well as allies in the field.

Through convenience sampling, we identified colleagues in universities that each author of this article knows. Through our personal and professional work and our involvement in this field we reached out to individuals who have developed creative and safe ways to standardize data related to undocumented students. With convenience sampling in mind, we reached out to campus personnel who directly work in undocumented student affairs. While identifying our contacts, we also sought to connect with universities that represented a variety of student experiences, resources, and trajectories—such as private, public, 4-year, and 2-year colleges. While some individuals did respond to our questions, some of the responses introduced barriers to our process, including (1) concerns over identification of the institution, (2) lack of staff capacity to respond, and (3) lack of permission from their supervisors to share. Table 1 details the institutional participants, including the authors of this study. The table details the U.S. state where the respondents are based, the type of institution they represent or where have conducted their work, and whether they provided a response.

Table 1. State Where Institution Is Located, Type of Institution, and Responses

State	Type of Institution	Responses
Massachusetts	Private and comprehensive institution. It treats undocumented students the same as domestic students. It has a range of 2–3 support systems, including student organizations and clubs.	Response provided, with concerns about identifying the university
Illinois	Private and comprehensive institution. It treats undocumented students the same as domestic students. It has a range of 2–3 support systems, including student organizations and clubs.	Response provided
California	Public university system. Legislation provided a Dream Center, state aid, and funding to provide resources mandated by the state.	Response provided
California	Primarily private universities. They treat undocumented students the same as domestic students. They provide scholarships opportunities and a safe tracking method.	Response provided
California	Primarily public universities. Legislation provided a Dream Center, state aid, and funding to provide resources mandated by the state.	Response provided
New York	Public university system. It receives state aid. Funding is not provided for resources, but instead funding is up to the individual campus to provide.	Response provided
New York	Public 4-year institution. It receives state aid. Funding is not provided for resources, but instead funding is up to the individual campus to provide. It has a safe tracking method.	No response, did not receive approval from supervisor
California	Public 4-year institution. Legislation provided a Dream Center, state aid, and funding to provide resources mandated by the state. It has a tracking system in place.	No response, lacked capacity
California	Public 4-year institution. Legislation provided a Dream Center, state aid, and funding to provide resources mandated by the state.	No response, lacked capacity
Utah	Public community college. It has a Dream Center and dedicated staff.	No response, lacked capacity
New York	Public university system. It receives state aid. Funding is not provided for resources, but instead funding is up to the individual campus to provide.	Response provided
New York	Public 4-year institution. It receives state aid. Funding is not provided for resources, but instead funding is up to the individual campus to provide. It has a safe tracking method.	No response, did not receive approval by supervisor

State	Type of Institution	Responses
California	Public community college. It has a catalyst grant that propelled Dream Centers to establish support. Assessment efforts to continue to understand student population and need.	No response
California	Public community college. It has a catalyst grant that propelled Dream Centers to establish support and how much support is needed.	No response
California	Public 4-year university. It has comprehensive assessment efforts to continue to understand student population and need.	No response
Utah	Public community college. It has a Dream Center and dedicated staff.	No response, lacked capacity

Table 1 details 14 prospective participants, seven of whom responded and seven who did not. Regardless of where they exist, some universities were hesitant to identify themselves out of concern that their practices were for internal purposes only or concerns that they could be targeted by the Freedom of Information Act. Moreover, many of the individuals are situated at the intersection of immigration and education at their institutions, are directly impacted by immigration legislation, and lack capacity to answer our questions. While we knew that their strategies were creative and protected by FERPA, we also understood that the strategies were not easily replicated due to restrictions and the concerns they highlighted. The hesitancy to participate and the lack of capacity demonstrated the importance of properly supporting, informing, and funding support structures of this population and the staff that serve them.

In our sharing we realized our article could benefit from our own professional and personal experiences in this field. We were inspired by our colleagues who incorporated their professional and lived experiences as valid and potent data. From the work of Pre-Health Dreamers (Nakae et al., 2022) to Latina Sister Scholars (Espino et al., 2010), we used our knowledge and expertise in this field to inform and expand on responses we received to our questionnaire. Our methods were grounded in critical pedagogy (Freire, 1972) to frame and situate our professional and personal lived experiences within the pre-collected data.

Once our responses had been documented, they were coded into one of eight categories: (1) guidance, (2) data collection, (3) information development, (4) collaboration, (5) personnel and hiring, (6) direct involvement, (7) expanding services, and (8) policies. We then categorized these codes into three overarching themes that spoke to the campus efforts to develop safe and reliable data for undocumented students in higher education. Table 2 clarifies how the eight categories were organized into three themes: (1) developing and managing safe and inclusive data collection, (2) intentional personnel hiring, and (3) expanding existing and needed services.

Table 2. Coding Survey Responses

Theme	Code	Example Quotes	Frequency
Developing and managing safe and inclusive data collection	Guidance	"During the last presidential administration, the California attorney general released guidance to K–12 schools on protecting students' privacy, [the guide] was mirrored in the practices of higher education institutions in the state."	4
	Data collection	"We now only use the receipt of a [California Dream Act Application] CADAA to identify students as undocumented. Those data have the same levels of protection as our FAFSA filers."	20
	Information development	"Provide extra training regarding FERPA to all staff working with undocumented students."	8
	Collaboration	"The admissions office formed partnerships with community-based organizations and local schools that have large numbers of immigrant students and we facilitate "warm handoffs" so that a student is aware of who is safe to share their status with at the University and where to go for resources."	6
Intentional personnel hiring	Personnel and hiring	"When hiring, create interview questions and requirements that recruit well-rounded employees with a background in the undocumented and/or immigrant community, have a passion for serving this population, understand the high level of confidentiality needed to serve this population, etc."	12
	Direct involvement	"Invite students to a private [email list] that is only controlled by key players."	3
Expanding existing and needed services	Expanding services	"Budgeting for our non-employment-based experiential learning fellowship."	9
	Policies	"The University of California has advocated and supported the expansion of services and financial support cited above, but it is also a credit to the student and other activists in California that we are where we are."	10

FINDINGS

Through the responses and narratives we collected, we identified three key findings with regard to inclusivity, safety, and reliability of data for undocumented students in higher education:

1. Developing and managing safe and inclusive data collection methods through safe estimates via proxies, deidentifying data, coding, and positive evidence

2. Intentional personnel hiring such as staff with personal and professional experience working

with this population who can coordinate individual interactions to better account for this population

3. Expanding existing and needed services for this population to better assess the needs of this population, because this population often does not share their status because they do not have access to safe or informed individuals.

Takeaways

Creating safe and inclusive data collection method through

1| Assessing undocumented student populations,

2| Ensuring safe measures,

3| Using positive evidence data, and

4| Collecting data through departmental collaboration.

1. ASSESSING UNDOCUMENTED STUDENT POPULATIONS

While institutions of higher education seek to create and establish resources for undocumented students, many of them also wonder how they can count students who are undocumented and enrolled on their campus. Some institutions might need to determine the number of undocumented students on campus to evaluate the support this population needs. Some institutions might also want to prepare to enroll their first undocumented students. Currently, there are "more than 408,000 undocumented students enrolled in postsecondary education" (American Immigration Council and Presidents' Alliance on Higher Education and Immigration, 2023). California with 83,000, Texas with 59,000, and New York with 30,000 are the states with the most undocumented

students. Moreover, practitioners have witnessed more students enrolling without employment authorization and Social Security numbers through DACA, calling on more-informed advisors and holistic support, which could also mean that administrators seek data to be able to allocate funding. How can institutions account for students to justify expansion and ensure safety protocols? Some practitioners have already implemented data collection practices to account for students and to justify expansion.

2. ENSURING SAFE MEASURES.

One of the questions that we asked participants was, "What practices do you have in place to account for undocumented students, to justify expansion and funding, and to build a more inclusive system?" Various respondents mentioned that data of undocumented students were being collected on their campus, but that perimeters, coding, and access to these data was kept confidential from the rest of the campus community such as staff, faculty, and students.

> We are very tight with data access permissions. Not only do we not use any clear "undocumented" markers in our student information system, but any immigration data (which could be interpreted/distilled in order to identify those who are not US citizens/ permanent residents and who do not hold another status in the US) is available to a very small group of staff. Immigration status is, as a rule, never included in shared data unless absolutely necessary.

Respondents have stated that, if they collect and code data, they also use safe markers, omitting words that identify a student's undocumented status in any data input within the system, even

for admission, financial aid, or tuition purposes. "Undocumented," "DACA," and "Dreamer" are words that should be omitted from coding. Running and requesting processes are also held to strict confidentiality with coding that omits these terms for requests. Respondents also stated that any data collected regarding undocumented students should be limited to key players.

> The admission and financial aid director and the lead who serves undocumented students work with the system to create a non-identifying code. This code can help create a report that provides numbers that do not identify info such as name, immigration status, address, etc.

Another respondent mentioned an even higher level of confidentiality: "Aggregated data is considered highly sensitive and only provided to college presidents and the chancellery for internal purposes.

3. USING POSITIVE EVIDENCE DATA.

In most cases, as students enroll in higher education institutions, the admission and financial aid offices are vital to the enrollment success for undocumented students and have access to the data that could be available for practitioners who are leading undocumented students' resource centers, hence why admission and financial aid directors are vital in partaking in data collection. Other practitioners noted that they use positive evidence data from state financial aid: "[We] only use the receipt of a [California Dream Act Application (CADAA)] to identify students as undocumented. Those data have the same levels of protection as our FAFSA filers." CADAA provides access to financial aid to undocumented students with and without DACA and to students with temporary protective

status in the state of California. CADAA has allowed many California public higher education institutions to use positive evidence to estimate the number of undocumented students on their campuses. These numbers are not precise, however, since not all undocumented students apply for CADAA due to fear; many also find it challenging to complete the form, some do not know the application exists, and some assume they are not eligible.

Even though it is an estimate, institutions from states that provide access to state financial aid to undocumented students can also assess whether using their financial aid application numbers as data could be beneficial in creating support: "24 states and D.C. provide in-state tuition to the states' undocumented students. Of those states, 18 and D.C. ('Comprehensive Access') also provide access to state financial aid. Massachusetts, which just passed in-state tuition for undocumented students, brings the number of states with access to in-state tuition to 24" (Higher Ed Immigration Portal, 2023).

One of the respondents served as a residence specialist and UndocuLiaison of the university, where they worked closely with the vice president of student affairs, the financial aid director, and the research institute to create coding that allowed their campus to run a process to create estimates of undocumented students in the university.

> Dream Center Coordinator, Director, or undocu-liaison works closely with the school Residence Specialist, Financial Aid Director, and Admission Director to strategize processes to estimate the number of undocumented students based on financial aid applications, non-resident tuition exemption forms submitted (ex. AB 540), students visiting a dream center or undocumented student program.

This above-named respondent worked closely with the financial aid director to pull the number of CADAA applications submitted. Moreover, the respondent also created a non-identifying report that helped assess the number of students who applied for the non-resident tuition exemption, an affidavit that non-residents who had graduated from a California high school could submit to be evaluated for in-state tuition. Many undocumented individuals submitted this form, providing the respondent with a closer estimate. Due to the sensitivity of this document, only two staff members had the privilege of processing and knowing the codes for this form. Even though it was not exact, this number would help get a precise number of students on campus.

4. COLLECTING DATA THROUGH DEPARTMENTAL COLLABORATION.

Data collection without identifiers helps staff and administrators identify the number of students who are undocumented and enrolled on their campus while keeping the student's identifying information confidential. The examples noted above also highlighted that, through collaboration with other offices, practitioners were able to collect data without identifiers. Additionally, with liability being a significant priority for administrators and legal counsel, setting restrictions on who has access to the data among department spaces, restrictions on coding, and contracts that preserve confidentiality, and training can lessen individuals' uncertainty about collecting data on undocumented students.

Takeaways

Accounting for undocumented students leads to better

1| access to dedicated personnel,

2| expansion of institutional aid,

3| legal services support, and

4| additional institutional support

1. INTENTIONAL HIRING

One of the primary findings is the necessity of hiring intentionally. Assigning full-time staff to support undocumented students requires data collection.

Due to the sensitive nature of working with data that include data for undocumented students, personnel was an area of importance within the findings of this research. One practitioner from a public university stated, "I would hire directly impacted individuals who understood the sensitivity of this data and how to maintain anonymity. Additionally, these individuals had the professional and personal experiences to inform future practice."

When establishing efforts to implement undocumented student resources and programming, some institutions hire a part-time or full-time coordinator or director to be the lead. Other institutions employ or designate a task force of key players to lead the efforts. Regardless of which option is best for the institution, practitioners noted that hiring an individual has allowed for the centralization and confidentiality of data regarding undocumented students. A director of undocumented and immigrant student programs at a 4-year public university stated,

> My role at the centralized level allows me to engage with the data in a safe way and positions me to justify and provide information on how we can expand resources across the campuses. …The creation of this position has created an educational opportunity for campus leaders to get a better sense of estimated student population sizes, which they otherwise may have assumed were much smaller or not present at their campuses.

The staff of undocumented student centers or liaisons who were respondents in this research also noted the importance of staff in data collecting and sharing among departments that could lead to hiring of full-time staff. A practitioner from a liberal arts college stated,

> I never refer to a student's status in writing, if at all. I may at times refer to "students without US work authorization" more generally in conversations about our non-employment-based experiential learning fellowship. We have a diverse group of students without US work authorization—from those on dependent visas, to those waiting for an EAD [Employment Authorization Document] renewal, to those without access to US work authorization—so referring to a student as someone without US work authorization can mean a lot of things and does not convey anything specific about their immigration status.

Within institutions, departments often share details or documentation with other departments only if the student provides permission. Justly so, data on immigration has been reserved only for individuals who are processing documentation necessary for admission, in-state tuition, financial aid, and the departments that work with international students. This information is often also provided to coordinators of undocumented student programs or Dream Centers that keep the data secure only for their use. Practitioners noted that they provided only "Figures aggregated at the college or system level when necessary. Therefore[,] the amount of people who have access to any numerical data is extremely limited."

Intentional hiring encourages hiring of individuals who understand the level of confidentiality undocumented students require and who are able to perform their jobs with a high sense of sensibility. A practitioner from a private liberal arts college stated that they "offer confidential drop-in advising hours, advising appointments, and bi-weekly dinners for our students in fragile statuses. From these conversations, I get a sense of the size of our population each year and can advocate accordingly."

Even more, many of the positions that have been filled to serve undocumented students have been filled by staff who are DACA recipients, creating a greater connection and sense of confidentiality (Cisneros & Valdivia, 2018). Whether or not institutions have established an undocumented student resource center, hiring or appointing staff to work with this population should be intentional.

Based on the authors' experiences and the responses from the participants of this study, administrators are always worried about liability. Promoting that the campus is DACA-friendly, creating Dream Centers, gathering data, and providing resources seem like a task that comes with fear of putting students in danger and putting the institution in a sticky situation.

Hiring knowledgeable people and setting perimeters through which staff can access data can enhance

the support provided to undocumented students. It is beneficial that staff with access to data about this population have a background in working with this population and should understand why confidentiality is vital. This finding was pertinent in understanding the need for data collection to accurately support undocumented students.

2. EXPANDING SERVICES

Another major finding noted by the authors' experiences as well as the participants is that, to expand services, data collection continues to be important. Another of the questions we asked participants was, "What practices do you have in place to account for undocumented students, to justify expansion and funding, and to build a more inclusive system?" What we found was that practitioners were clear that, even without the accurate data of undocumented students on campuses, it was imperative to expand services and needed services for this population to better assess their needs, since this population often does not share their status because they do not have access to safe or reliable support. Expanding services for undocumented students also leads to the retention of this student population. Based on the respondents' answers to the questions, there were two overall themes: (1) access to legal services and institutional aid, and (2) expanding the role of institutional agents.

3. ACCESS TO LEGAL SERVICES

One of the main services that was evident from the respondents was expanding legal and financial aid services on campuses. According to Pérez (2010), with campus support programs and opportunities, undocumented students can mitigate

the barriers they face within higher education. When undocumented students have access to legal resources, they can renew their DACA or seek advice from lawyers on campuses. Students want to feel safe, and safety breeds inclusivity and leads to retention. A current executive director of student experience and inclusion at a private institution in Illinois said, "We provide access to legal advice and financial support and a bilingual Family Program is available for all students and their families that allows for families to earn free courses and save money."

Through legal services, practitioners can account for the undocumented students on campus because students will use the resources. Furthermore, students want to feel safe, and safety breeds inclusivity and leads to retention. It was also evident that expanding access to institutional aid can better account for undocumented students. An executive director of student financial aid support from the University of California system said,

> Starting in 2000, the State of California created the "AB 540" exemption, which allows students who have attended and graduated from a high school in the State to qualify for in-state tuition levels. Starting in 2011, the State provided UC [University of California] the authority to provide both State- and University-funded financial aid. UC's financial aid philosophy is that all students should contribute the same amount towards their own education. For our undocumented students, that means "backfilling" for missing Federal Pell Grants and providing State-funded Dream Loans.

For this practitioner, the expansion of access to financial aid led to accounting for undocumented students. Since cost is a major barrier to higher education, institutions can use their own financial aid

policies that would provide undocumented students with access to other funding opportunities for their education. The University of California system can serve as an example and mirror for other public school systems that do not have comprehensive financial aid options for students.

4. EXPANDING THE ROLE OF INSTITUTIONAL AGENTS

One other service that practitioners noted expanding was non-employment-based opportunities for undocumented students. Since undocumented students without DACA cannot legally work, providing access to on-campus employment-based opportunities can contribute to accounting for undocumented students. According to the American Immigration Council and Presidents' Alliance on Higher Education and Immigration (2023), undocumented students can qualify for scholarships because scholarships are defined by the Internal Revenue Service as an amount paid for the purpose of study. Additionally, "Institutions may be able to provide internship stipends to students who accept off-campus internships. For example, students who accept an unpaid internship to further their study/training can be eligible to receive a living stipend to help offset living costs associated with being in an unpaid status" (Higher Ed Immigration Portal, 2023). Even more, a director of immigration services at a private institution in Massachusetts stated the following:

> An important trend within this population that we and many institutions are seeing currently is the shift from undocumented students predominantly holding DACA to undocumented students predominantly not holding DACA. This impacts resources. So, while our overall numbers of students in fragile statuses has

> stayed relatively consistent, our number of DACA holders is dwindling. This impacted, for example, the budgeting for our non-employment-based experiential learning fellowship.

According to the American Immigration Council and Presidents' Alliance on Higher Education and Immigration (2023), undocumented students can qualify for fellowship grants because they are paid for purposes of study and research and are considered non-employment based. Additionally, according to Immigrants Rising (n.d.), "Fellowships are generally defined as short-term opportunities, lasting from a few months to several years, that focus on the educational and/or professional development of the fellow." Therefore, expanding non-employment-based internships and fellowships are a great way to expand financial aid access and services within higher education for undocumented students.

The second theme for expanding services is the intention to hire full-time personnel to support those who are on campus, which is one of the findings we highlighted above. Many institutions cannot afford to hire a full-time staff member, however, so others have found ways to expand support for undocumented students. A director of immigration services at a private institution in Massachusetts stated, "I offer confidential drop-in advising hours, advising appointments, and bi-weekly dinners for our students in fragile statuses. From these conversations, I get a sense of the size of our population each year, and can advocate accordingly."

Offering listening sessions as a space of service to undocumented students will provide them with a sense of support on campus. This support leads to disclosing hardships, legal status, and other barriers to success within higher education. Undocumented students who feel supported and can openly

disclose their status are more likely to graduate and persist (Gonzales et al., 2013). By expanding the role of institutional agents to support undocumented students, it improves campus climate and retention (Cadenas et al., 2018; Cisneros & Lopez, 2016).

Finally, expanding services are all important for accounting for undocumented students because knowing the estimated number of undocumented students can influence services such as emergency grants, non-employment-based experiential learning fellowships, hiring of full-time staff, DACA funds, and broadening support on campuses.

LIMITATIONS

Our data collection consists of experiences and narratives from higher education professionals creating and navigating ways to include undocumented students in data accountability efforts. As we collected and analyzed the data, we came across limitations to this study. As stated above, there is no prior research on this topic. Due to the vulnerability of this population, data collection is not explored as a method of inclusion. Universities default to the perceived safety of the students and their own plausible deniability. As a result, there have been no efforts to document and assess data collection methods for undocumented students with sensitive immigration statuses. The result is a lack of available data to analyze existing practices.

When we did identify individuals who developed data sets and reliable practices, the suggestions often came from individuals who were leading these efforts at their campus and were at capacity and often underpaid. This resulted in several individuals sharing that they did not have the capacity to participate in this study. Time and capacity constraints, therefore, limited our data collection efforts.

IMPLICATIONS FOR RESEARCH AND PRACTICE

Higher education institutions continue to struggle with incorporating and accounting for undocumented students in their demographics data. Our research methods resonate with the struggles of the higher education institutions and our respondents; institutions are not sure how they can safely account for undocumented students. In fact, institutions are worried about the safety of both the students and the university. Concerns over identifiable markers for the staff as well as students went hand in hand. Historically, some institutions have been able to engage in fugitive work to include undocumented students in resources when state legislation prohibits access to certain state benefits (Carvajal, 2020). These were creative tactics to include undocumented students in higher education due to extreme anti-immigrant legislation. Although the work we described above is not considered fugitive work, many individuals treated it as such and were concerned about identifying themselves or their campus when sharing because they were unsure about the legitimacy of the practice they implemented.

Currently there is no existing research on safe and inclusive data collection practices that universities can look to accurately account for their undocumented student population. The findings in this research can help create an opportunity for universities to implement safe methods to account for undocumented students. Moreover, they can also vacillate between a choice of practices that work best for their institutions, depending on state legislation and opportunities in their state. For example, a state like California has made significant legislative efforts to support undocumented students. This has created an opportunity for higher education practitioners to expand their services and use affirmative markers to account for

undocumented students from state data. As a result, states like Illinois and New York, with similar in-state and state aid legislation, could learn from California, a state that advocates for the expansion of state services. Moreover, a state like Massachusetts, which just recently started expanding its education legislative efforts for undocumented students, can use California as a roadmap for what is possible.

Data collection allows funding to be disbursed appropriately. In the past decades, individuals such as coordinators or directors of Dream Centers and undocumented student programs have been underpaid compared to directors and staff of other departments or programs. Being underpaid can be a result of administrators not understanding the specialty and knowledge required to serve undocumented students, the amount of time it takes to research and work with each student, and not knowing exactly how many students on campus will need the resources of a Dream Center or UndocuLiaison over time.

Overall, not knowing or acknowledging the number of undocumented students attending the institution can lead to underfunding of staff, programming, and resources, creating a non-inclusive campus for undocumented students.

Even more important, knowing the number of undocumented students or setting a goal to enroll more undocumented students can increase the impact an institution can report when applying for grants that fund programs for underrepresented groups or diversity efforts. Funding is often tied to impact, such as, "How many individuals benefited from the funding provided?" Programs can be underfunded if there is no proof of impact.

With regards to research, this study can also create an opportunity to continue researching safe data collection practices to normalize them. As previously stated, there is no literature on data collection efforts to account for undocumented students across educational institutions. Academic discussion on these data can create a space to further explore and evaluate the effectiveness of data accountability efforts and practices. Findings from studies can situate institutions to begin having difficult discussions on practices to incorporate with this population.

Ultimately, by sharing the practices that account undocumented students as recognizable voices in their institution, we create an important level of accountability for institutions to do better and to do more for their undocumented students (Jach & Carvajal, 2023). This level of accountability could result in the difference between sustainable advocacy, funding, and inclusion of a population that is often undercounted and undervalued.

CONCLUSION

This article sought to document university practices to account for undocumented students in demographic and data collection efforts. Our findings suggest that effective practices currently exist and that there is a clear benefit to hiring personnel to focus on this population. Campus attempts at safe data collection often depend on the political context of the state and whether the university is public or private. As one of the authors of this article notes in their personal narrative, private universities often already collect the number of possible undocumented students due to their smaller numbers, financial aid application forms, and

need-based scholarships. Some public universities also implemented this practice through existing information tied to legislation such as in-state tuition and state aid.

Regardless of whether the campus was in a conservative or progressive state, however, and regardless of whether it was private or public university, the key determining factor for safe and inclusive data collection was the existence of a trusted and highly informed staff member who would manage the data. Rationale for hiring informed staff has been clear from previous studies that focus on undocumented student and student affairs services (Cisneros & Valdivia, 2020; Cisneros et al., 2022). However, the findings of this study position that hiring staff can also help create safe data accounting practices which can lead to expanding services and allocating funds toward undocumented student needs. As general undocumented student data continue to show that 98,000 undocumented students graduate from high school every year (Zong & Batalova, 2019), it is necessary for university systems to begin developing practices that properly account for and allocate resources for a population that so often pays out of pocket for their education.

RECOMMENDATIONS FOR REFLECTION AND PRACTICE

Through our practice and speaking with practitioners working with undocumented students, we remain convinced that gathering data regarding undocumented students is vital to strengthening resources and support. We also know, however, that a high level of confidentiality and sensitivity must be maintained throughout the data collection

of this population. This means that designated officials should be actively learning and integrating their knowledge base on this population across their work, and not collecting data for the sake of collecting them.

We recommend that the campus administration be informed of the needs of undocumented students and understand best practices for serving this population. The language used, the individuals involved, coding, and maintaining information are essential in keeping students' safety and confidentiality at the highest level. Without administration support, staff can go only so far in data collection, reporting, and implementing support services based on data.

Campus administration supporting the launching of initiatives can also be followed by implementing initiatives to ensure other staff and faculty are trained. Training on state and federal policies affecting undocumented students, the chilling effect, and practices that maintain confidentiality when advising students and collecting their data must also be frequent, if possible annual or bi-annual collection. When collecting data, understanding what degrees and careers undocumented students pursue is vital, since a student's immigration status can affect clinical experience, background checks, internship and fellowship attainments, clinical and financial aid, and more.

As part of responsible data collection, administrators, staff, and faculty must also know if any anti-immigrant laws have been passed in the state, which would require an increase in keeping the student's information confidential. Such anti-immigrant laws would also require stricter gatekeeping from any task force. We recommend that the departments housing

undocumented student information ensure that there are non-identifying markers and language in any database. Individuals must ensure that words like "undocumented" or "Dreamer" are omitted from systems and data, and be replaced with non-identifying markers.

Through training, additional contracts can also be created where staff state their understanding of the level of confidentiality needed and emphasize FERPA and its importance in the safety of students.

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