

**The Promise and Limits of Sanctuary School
Policies for Undocumented Students**

Introduction

Since President Trump's Inauguration in January 2025, school districts across the United States have reported an increase in Immigration and Customs Enforcement (ICE) activity surrounding K–12 school campuses. The increase in ICE activity occurred following the federal government's rollback of the sensitive locations and protected areas policies that were established through Department of Homeland Security (DHS) memos in 2011 and expanded in 2021. Almost immediately after the rescission, educators in California, Texas, Georgia, and Florida reported multiple appearances by ICE officers near school entrances, requests for student or caregiver information, and visible patrols during drop-off and dismissal. These patterns were consistent with national data, which showed an increase in community-level enforcement during the first months of 2025. The American Immigration Council noted that just the presence of immigration agents near schools could lead to students in mixed-status families missing school, disengaging from learning, or experiencing heightened anxiety and trauma (American Immigration Council, 2025).

With the federal protections removed, schools can no longer rely on national guidelines to serve as de facto safe zones. For example, in April 2025, ICE officers attempted to enter two Los Angeles elementary schools, which prompted teachers and administrators to physically intervene and demand judicial warrants (Harvard Immigration Initiative, 2025). As a result of incidents like the Los Angeles elementary schools, sanctuary school policies have become both more essential, as educators are now responsible for constructing local protections in an environment where federal policy no longer provides a floor of safety for undocumented children. For undocumented students, many of whom already live in a state of ongoing vigilance,

this surge in enforcement has transformed the schoolhouse into yet another site of possible exposure and threat.

Therefore, sanctuary school policies have emerged as an increasingly important reform intended to preserve undocumented students' right to learn without the constant threat of detention or family separation. This paper examines how sanctuary policies were designed to support undocumented students, the extent to which they succeeded, the adverse or unintended consequences they produced, and what further supports are needed to make such policies substantively protective rather than primarily symbolic.

Historical and Policy Context: Why Sanctuary Schools Emerged

Sanctuary schools originally emerged in response to a long-standing structural inconsistency in U.S. law. On one hand, the *Plyler v. Doe* (1982) ruling affirmed that undocumented children have a constitutional right to attend public school, free of discrimination. On the other hand, federal immigration enforcement has consistently treated those same children as 'deportable'. This contradiction led to students exercising their educational rights being potentially exposed to immigration enforcement. As educational rights and immigration policy were fundamentally misaligned on this matter, federal immigration agencies attempted to manage this contradiction. In 2011, under the Obama Administration (2009 - 2017) ICE issued its Enforcement Actions at or Focused on Sensitive Locations memorandum. This policy instructed ICE agents to avoid K–12 schools, early childhood programs, school bus stops, medical facilities, and places of worship, except under extraordinary circumstances, to not deter individuals from accessing essential services (Morton, 2011). Although the memo did not

eliminate all risks, it helped establish schools as de facto safe zones where undocumented children could participate in daily school life with some degree of protection.

Even though the 2011 Sensitive Locations memo technically remained in place, the first Trump administration (2017–2021) issued executive orders that expanded interior enforcement priorities and effectively designated nearly all undocumented individuals as targets for removal. This shift deepened fear across mixed-status communities and undermined trust in institutions, even when local school officials sought to reassure families. In response to actions by federal agencies, many school districts in states such as California, New York, Illinois, and Oregon passed formal sanctuary school or safe-zone resolutions to limit cooperation with federal authorities and protect student information (Southern Poverty Law Center, 2018). These local policies aimed to restore a sense of safety that federal guidance had previously provided.

During the Biden administration (2021 - 2025), the Department of Homeland Security issued the Guidelines for Enforcement Actions in or Near Protected Areas. This policy expanded and clarified the earlier Sensitive Locations framework by designating schools, preschools, playgrounds, school bus stops, social service centers, hospitals, and places of worship as 'Protected Areas'. The issued memo emphasized that enforcement in these locations would undermine public trust and deter community members from accessing essential services, similar to the 2011 memo (Mayorkas, 2021). For undocumented families, the Protected Areas policy reinstated some of the stability lost during the previous administration and reaffirmed that fundamental rights, such as education, were to be preserved.

This stability was short-lived as in January 2025, the Department of Homeland Security rescinded the 2021 Protected Areas policy under the second Trump Administration (2025 -

present). Boggs (2025) noted that new DHS guidance issued in late 2024 had already begun expanding ICE's ability to enter schools or obtain student information, but the 2025 rescission fully eliminated federal expectations for restraint. As a result, educators in multiple states reported a rise in ICE visibility near school entrances, bus routes, and administrative offices, leaving families fearful and schools unprepared to respond. The abrupt withdrawal of federal protections revealed that the safety of undocumented students has always been shaped by the ways institutions interpret, enforce, or resist federal policy on the ground. With the continuous changes to immigration enforcement, it is important to note that enforcement is inseparable from the racial politics of the United States at the time. Bobo and Dawson (2007) illustrate how immigrants, particularly Black, Latino, and Asian migrants, are positioned within a racial hierarchy, then portrayed as cultural, economic, or security threats. This pattern was unmistakable when Benjamine Huffman, Acting Deputy Commissioner of U.S. Customs and Border Protection, defended rescinding the Protected Areas policy by declaring that "we will no longer allow dangerous individuals to exploit schools and churches as places to hide from arrest." By framing spaces, which are central to children's safety and learning, as potential shelters for 'dangerous individuals', Huffman's statement reproduced the longstanding racialized narrative that immigrant communities pose inherent security risks, which reinforces the kinds of discourses Bobo and Dawson (2007) warn against. Against this backdrop of shifting federal protections, institutional contradictions, and racialized enforcement, sanctuary schools arose as acts of institutional resistance within a political landscape where immigrant communities are routinely marginalized, surveilled, and scapegoated.

Intended Purpose and Positive Outcomes of Sanctuary School Policies

Gleeson and Gonzales (2012) argue that undocumented life in the United States is fundamentally structured by institutions, such as schools, workplaces, hospitals, courts, and each institution recognizes and responds to legal status differently. This has produced uneven forms of vulnerability or protection for students over the last few decades. Because schools have historically been one of the few institutions where immigration status was not supposed to matter, sanctuary school policies emerged to reinforce the principle that schools must operate based on educational missions rather than federal enforcement priorities. Sanctuary schools intend to protect and affirm undocumented students, but have limitations in the reality that schools alone cannot counteract the structural forces at the state or federal level. Even so, districts crafted sanctuary policies with several interconnected goals: to reduce fear, protect educational access, support students' psychological safety, and rebuild trust between immigrant families and schools.

One of the most immediate and measurable impacts of intensified immigration enforcement on undocumented students is declining school attendance. A growing body of research shows that immigration raids, workplace enforcement actions, and visible ICE activity near schools significantly depress daily attendance for children in immigrant households. Amuedo-Dorantes and Arenas-Arroyo (2019) and Kuka et al. (2020) found that immigration raids were associated with substantial increases in absenteeism among Latino students, particularly in elementary grades. These trends held true for older sets of students in areas with high percentages of immigrant families. These declines are driven largely by fear as families may keep children at home to avoid potential exposure to enforcement during the commute to school or because they fear that schools are no longer protected environments (Cervantes et al., 2021).

On the ground, educators have reported schoolwide drops in attendance following local raids or rumors of ICE activity, losing as much as one-third of their students on days when enforcement actions occurred nearby (Cervantes et al., 2021). Anecdotally, teachers describe students expressing fear that a parent might be detained while they are in class, and many families avoid school-based services, including tutoring, meals, or counseling, during periods of heightened enforcement (Gándara & Ee, 2018). These attendance disruptions thus reduce access to essential social supports that schools provide. Sanctuary school policies were designed precisely to interrupt this pattern. By clearly communicating that schools will not share information with ICE, will require judicial warrants before granting access, and will not collect unnecessary data, sanctuary policies aim to stabilize attendance by restoring families' trust in the school environment.

A second purpose of sanctuary schools was to promote psychological safety and identity development. Charmaraman and Grossman (2010) emphasize that adolescent well-being is closely tied to students' perceptions of belonging and identity affirmation. Many undocumented youth identify as Latino, Asian American, Black, or multiracial, and their experiences of immigration enforcement are deeply entangled with racialization. Sanctuary policies, along with public affirmations, visible signage, and staff training, signal that students' identities and backgrounds are valued rather than stigmatized. For communities that have experienced discrimination or surveillance from state institutions, schools can be perceived as extensions of government authority. Sanctuary policies can counter this perception by making clear that schools exist to protect and serve students, not to expose them to enforcement. This trust-building work includes multilingual communication, transparent commitments to data privacy, and clear limitations on cooperation with immigration authorities. Therefore, the

creation of sanctuary schools has allowed schools to affirm dignity, reduce harm, and strengthen community connections for populations navigating extraordinary structural and political barriers.

Finally, sanctuary schools link schools with community networks that can support immigrant families. Sanctuary schools frequently partner with religious organizations, immigrant-led nonprofits, legal aid groups, or mental health providers to offer legal clinics, counseling, and material support. At the very least, sanctuary schools provide information on where immigrant families can find these resources. These partnerships are a valuable resource as Park, Dizon, and Malcolm (2020) explain that communities of color often rely on 'spiritual capital', which is resources derived from faith, community resilience, and collective identity, to navigate structural hardships. These partnerships reinforce resilience and provide holistic support to students whose lives are shaped by uncertainty and vulnerability.

Adverse and Unintended Outcomes

Despite the intentions and positive outcomes, sanctuary school policies also produce several adverse or unintended outcomes, which emerge from the structural constraints of the policies themselves. One significant challenge is the risk of false security. Bertrand et al. (2015) showed how policy language can obscure structural inequalities by using vague or depoliticized terms. Due to many sanctuary policies describing schools as 'safe' or 'inclusive', families may believe sanctuary provides complete protection from immigration enforcement when, in reality, schools cannot override federal law. When enforcement occurs despite sanctuary commitments, the resulting breach of trust can be devastating. Therefore, any district creating sanctuary schools must fully acknowledge the legal limitations of local protections. Alongside political language, sanctuary school policies have inherent structural limits. They cannot provide legal status,

prevent deportation outside school boundaries, secure financial aid eligibility, or guarantee safety during transit to and from school. Gleeson and Gonzales (2012) argue that undocumented individuals confront institutionalized disadvantages across multiple systems, and sanctuary policies that are focused only on the school environment cannot offset the cumulative effects of housing insecurity, employment challenges, or limited access to postsecondary opportunities.

A second adverse outcome is unequal implementation. Gleeson and Gonzales (2012) highlighted that institutional variability shapes undocumented individuals' experiences. In practice, this variability would manifest as some schools rigorously implementing sanctuary procedures, while others include sanctuary school in name only. This uneven implementation means that sanctuary protections often vary by school building, principal, or staff awareness. As a result, immigrant students with parents who speak English, have access to information, or possess higher levels of social capital often benefit more from sanctuary policies than those from linguistically or socially marginalized families. Sanctuary policies can also trigger political backlash. Deckman (2002) shows how religious and ideological beliefs strongly shape attitudes toward education policy, including issues involving marginalized groups. Bobo and Dawson (2007) demonstrate that immigration debates are deeply racialized and often weaponized politically. For example, in July 2025, the Federal government sued the city of Los Angeles over its sanctuary policies, and other cities have faced similar threats of funding cuts or lawsuits claiming that schools are obstructing federal law. This backlash can create a negative effect on educators, who may become hesitant to explicitly support undocumented students. These adverse outcomes highlight that sanctuary policies, while well-intentioned, cannot fully deliver on their promises in isolation of structural reform.

What Else Was Needed: Solutions and Policy Recommendations

While sanctuary school policies are a necessary stopgap in this current political climate, they are insufficient reforms in their current state. As sanctuary policies require legal precision and systematic implementation to be effective, districts must provide detailed guidance on exact steps for responding to ICE inquiries, and ensure all personnel receive annual training. This transforms sanctuary from symbolic commitment into actual procedural protection, addressing the institutional gaps highlighted by Gleeson and Gonzales (2012), and ensures that students are safe within any school in the district.

Second, sanctuary schools must adopt anti-racist and truthful policy language. Sanctuary policies should explicitly acknowledge that immigration enforcement disproportionately targets communities of color, and that sanctuary is part of a broader commitment to racial equity. This framing is necessary to build an honest and ethically grounded policy foundation. One way to so do would be to extend identity-affirming curriculum and counseling to their students. Schools should integrate immigrant narratives across subject areas and provide trauma-informed counseling that specifically addresses fears related to immigration enforcement.

Finally, a sanctuary must be connected to multi-level policy advocacy. Schools cannot eliminate undocumented students' precarity on their own. Districts need to advocate for state policies that protect sensitive locations, limit inter-agency data sharing, expand in-state tuition eligibility, and support financial aid access for undocumented students. Through advocacy, states should then join coalitions pushing for federal immigration reform, recognizing that a sanctuary cannot reach its full potential without structural change at higher levels of governance. As schools or districts alone cannot counteract federal pressure, the states themselves must commit

to protecting undocumented students. These strategies reimagine sanctuary as a sustained, multi-layered commitment to ensuring undocumented students can learn, thrive, and learn beyond fear.

Conclusion

Sanctuary school policies are a morally urgent and educationally necessary reform in an era of increased immigration enforcement and rising political hostility toward immigrants. Sanctuary school policies offer undocumented students important forms of symbolic, emotional, and procedural protection that create pockets of safety, affirm marginalized identities, strengthen community networks, and reduce fear-based barriers to schooling. However, without clear legal protocols, consistent implementation, explicit anti-racist framing, and systemic reforms beyond the schoolhouse, sanctuary risks becoming more symbolic than protective. As a result, sanctuary must be reconceptualized not as a single policy but as a multi-layered strategy requiring legal clarity, identity-affirming practices, community partnerships, and broader state and federal advocacy. In the current climate, where ICE presence around schools has intensified, symbolic sanctuary is not enough. For schools to fulfill their fundamental responsibility of ensuring that every child, regardless of immigration status, has the safety, dignity, and freedom to learn, they must adopt a more expansive and integrated approach to protecting undocumented students.

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