

UNDOCUMENTED STUDENTS AND STRATEGIC ENROLLMENT MANAGEMENT: GUIDANCE AND CONSIDERATIONS FOR FINANCE, POLICY, AND INCLUSIVE PRACTICE

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This article addresses concerns related to college going and access for undocumented students related to the strategic enrollment management (SEM) function on college and university campuses. Utilizing theory and research related to college choice, SEM, and undocumented student issues, this review seeks to identify a set of guidelines aimed at helping SEM leaders and practitioners better serve undocumented students through the college choice process by highlighting considerations associated with finance, policy, and inclusive practice. Applying broad lessons from research to practice, the primary aim of this article is to better enable SEM professionals, some of whom may have little experience working with undocumented students, to better serve this population and the underlying goals of equity, access, and diversity.

Introduction

In higher education, the ability of students to access information relevant to college going and choice process is essential. This is evidenced by the sizeable

number of theories explaining how students go about this process (DesJardins, Ahlburg, & McCall, 2006; Hayes, 2015; Hossler, 2015; Hossler, Bean, & Associates, 1990; Hossler, Schmidt, and Vesper, 1999;

Perna, 2006, 2013; Serna, 2015; Serna & Birnbaum, 2015). Additionally, institutions spend significant resources providing information about the admissions process. However, an understudied and often overlooked area of SEM practice and research relates to how this function can work to support undocumented students throughout the enrollment process. It is with this in mind that a few potential approaches are provided for supporting undocumented students by bringing together research on this population and areas related to the enrollment management function, in order to inform practice. The goal of this article is to present SEM leaders and practitioners with sound guidance in terms of student financial support, institutional and state policy, and direction as relates to inclusive practice for this growing population of students based on their specific needs, concerns, and constraints.

Background and Significance to SEM

Chen and Rhoads (2016) note that the only certainty facing undocumented students is the uncertainty of their educational opportunities. Research has shown that providing needed support, advice, and information to these students can help remove barriers to access (Burkhardt et al., 2012; Frum, 2007; Gildersleeve, 2010; Perez, 2010). Indeed, as higher education decision makers seek to serve the unique needs of this group, their ability to properly serve undocumented students is often compromised by the legal constraints within which they must operate. Because reliance is placed upon local discretion in terms of interpreting law and policy, this can and often does result in limited if any support for this underserved population. Moreover, federal and state legislation has been slow to respond to the needs of these students and their communities in terms of not only education but their right to be part of society (Abrego & Gonzales, 2010; Chen & Rhoads, 2016; Gonzales, 2007, 2016; Nguyen & Serna, 2014; Olivas, 2009, 2012; Teranishi, Suarez-Orozco, Suarez-Orozco, & Associates, 2015). Because there are over 11 million undocumented immigrants in the United States (Passel & Cohn, 2012), of whom over 65,000 graduate from high schools each year (Gonzales, 2007; Passel, 2005), this is clearly a subject that ought to matter to campus leaders and SEM professionals.

With this context as the backdrop, this article takes up the conversation from the perspective of the SEM function on campuses to provide strategies for supporting these students as they engage in the college going and choice processes with special emphasis on the financial, policy, and student support and inclusive campus culture concerns facing undocumented students across the higher education landscape. The major theme throughout this piece is that campus SEM offices can play a pivotal role in supporting access to higher education for this population while engaging in inclusive practice. Undeniably, the SEM function, through its multitude of responsibilities and direct interaction with students, can deliver important resources, information, and environmental signals that indicate to undocumented students that they belong on campus via deliberate financial choices, policy, and inclusive practices (Gildersleeve & Ranero, 2010; Ovink, Ebert, & Okamoto, 2016; Perez, 2010; Perez, Cortes, Ramos, & Coronado, 2010). These three are the topic of each of the following sections, which seek to outline some guidelines that may help those charged with SEM duties and become more responsive to the needs and contexts facing undocumented students wishing to enroll in higher education.

Financial Constraints

Evident in the undocumented student literature are the hurdles these students face when attempting to access higher education (Abrego & Gonzales, 2010; Chen & Rhoads, 2016; Chin & Juhn, 2010; Flores, 2010a, b; Garcia & Tierney, 2011; Nguyen & Serna, 2014; Olivas, 2009; Teranishi et al., 2015). In many instances, state and federal financial aid are not options for undocumented students (Cohen, 2014; Gildersleeve, 2010; Perez, 2010). In fact, Olivas (2009) notes that students with undocumented status are many times constrained by vague definitions of immigration categories and that these same individuals must rely on local interpretation and applications of ambiguous Internal Revenue Service (IRS) provisions related to financial aid.

Moreover, the often labyrinthine financial aid system across higher education can impact whether undocumented students apply to and access college (Frum,

2007). This is because although they may not fill out a Free Application for Federal Student Aid (FAFSA), they must nonetheless work through other, more obscure options to finance their education. This is a substantive concern for many undocumented students. This notion is supported by a survey of 909 undocumented students from the University of California, Los Angeles (Teranishi et al., 2015, p. ii). In the study, 57.9% reported being extremely concerned about how they would finance their education, while of those who had reported stopping out, 73.9% did so due to financial concerns. These concerns track closely to SEM's larger concerns around calls for accountability, degree outputs, and raising persistence and retention rates. Helping these students succeed is, in fact, an investment in the public good and the good of the institutions that serve this group.

On another note, financial aid policy and its interpretation for undocumented students has been left primarily to state and institutional actors. This is where SEM can play a pivotal role in providing needed access to resources and information and, where possible, financial support. However, financial aid is not the only economic limitation facing this group.

A second major constraint for undocumented students is their ability to qualify for in-state tuition. As of June 2014, at least 22 states had adopted some form of tuition policy aimed at undocumented students. Of these states, 18 have sought to extend some form of in-state tuition benefits, whereas 3 others have restricted access to or repealed in-state tuition by adopting exclusionary policies for undocumented students (National Conference of State Legislatures [NCSL], 2014; Nguyen & Serna, 2014; Vargas, 2011). Even under conditions where in-state benefits have been granted, this does not mean that access to higher education by these groups is now unencumbered, though recent studies provide evidence that these types of policies are closely related to increased enrollments from undocumented students (Amuedo-Dorantes & Sparber, 2014; Conger & Chellman, 2013; Dickson & Pender, 2013; Flores, 2010a, b; Kaushal, 2008). Nonetheless, these policy actions can set the stage for institutional and system-wide responses to the constraints facing undocumented students. For example, the community college systems of Alabama and North

Carolina have adopted policies that either prohibit enrollment by undocumented students at these institutions or require them to pay out-of-state tuition. Another set of examples comes from the university systems of Rhode Island, Georgia, Hawaii, and Michigan, all of which have implemented tuition policies regarding undocumented students, with Georgia's being the only one explicitly stating that institutions must verify "lawful presence" and the others allowing system policymakers to make these decisions (NCSL, 2014; Nguyen & Serna, 2014).

And while some states, colleges, and university systems have been proactive in creating a more inclusionary policy environment for students around financial aid and in-state tuition benefits (Cohen, 2014; Olivas, 2009, 2012), it must be reiterated that this should not be taken to mean that unfettered access to higher education is occurring for this group. Instead, it is better understood as a signal within states and systems that undocumented students are welcome within the education landscape; even if the underlying policies and legal requirements related to *Plyer v. Doe*¹ are not applicable to higher education at this point (Conger & Chellman, 2013; Garcia & Tierney, 2011; Garibay, Herrera, Johnston-Guerrero, & Garcia, 2016; Nguyen & Serna, 2014; Ovink et al., 2016; Perez, 2010; Suarez-Orozco et al., 2015). With this in mind, the scholarly literature provides some guidance for those who work in SEM and its component areas (Burkhardt et al., 2012; Frum, 2007; Gildersleeve, 2010; Kruger, 2016; Perez, 2010). Based on this research, there are several possible responses from SEM offices:

1. Help undocumented students find financial resources. Though headway has been made in some states and systems, the reality remains that these students must contend with a highly bureaucratic system. As Perez (2010, p. 34) points out, embedding a mechanism within the financial aid process that *actively* helps undocumented students find resources to fund their education or understand how they might become eligible for state or other funds is imperative. This includes engaging

¹Please see Olivas (2015) for an excellent overview of both state and federal court cases involving higher education and immigration from 2004 to 2014 at http://www.law.uh.edu/ihehg/documents/Cases2004-2014cases1621_1623/homepage.asp

with high schools, local community groups, and national organizations (Nienhusser, 2013a, 2015).

2. Where possible, use institutional scholarships to help make enrollment more affordable. Of course, in an era of limited resources, this may mean providing funds to this group from institutional coffers—a decision in the current political environment that may be unpopular. However, if the goal is to fully engage this community and enhance access for them, then institutions will need to redirect some scholarship funds to help defer the expenses, not just cost of attendance, that undocumented students face.
3. Consider their labor and home situations when providing financial guidance. Many of these individuals have financial responsibilities that do not mirror other students' (Canedo-Sanchez & So, 2015). Hence, it is essential that the financial resources and guidance provided account for the working conditions in which many may find themselves and how this relates to college going. Gildersleeve (2010, p. 8) and Gildersleeve and Ranero (2010) note that the familial and personal labor context for undocumented students is often characterized by long hours, low pay, unsafe conditions, and instability. Hence, the financial advice given to undocumented students should consider how their own financial responsibilities and conditions may impact their ability to obtain a college education by including these factors.
4. Make sure financial aid offices and others charged with helping undocumented students to secure resources for attending college are well versed in the intricacies of IRS policies facing this group. The ambiguity facing these students, as noted previously, requires a deliberate investment of time and resources into a concrete expression of inclusive practice (Munoz & Escalante, 2015).
5. Finally, while it may not be understood as a typical financial concern, the transfer process can introduce new or lengthier cost considerations. Hence, it is necessary to help facilitate transfer of both credit hours and institutional types so that they do not incur unnecessary expenses or extended

time to degree. Because many students begin at the community college (Frum, 2007; Nienhusser, 2013b; Perez, 2010), the transfer function often housed within SEM offices is an ideal place to help ease this process and help lower the total financial burden. A first step in this process is to urge undocumented students to complete a Transfer Admission Guarantee, if available, and to provide assistance for completing these documents (Perez, 2010).

While many of the practices presented here can aid undocumented students' access to higher education, there are other considerations that SEM professionals must take into account when working with this group. In closing this section, it is necessary to once again highlight the fact that SEM offices are often at the nexus of the financial concerns for students, generally speaking. This means that the SEM function can serve as a catalyst for increased access, retention, persistence, and graduation of this often marginalized group with regard to financial concerns. With this in mind, the next section continues this discussion by outlining some of the major policy concerns facing these students.

Policy Context and Concerns

Closely coupled with undocumented students' financial concerns are the legal and policy conditions of the state and institution as related to their undocumented status. Decision makers within the SEM area on campus are often faced with unclear, ambiguous, or in some instances contradictory policies at the state, federal, and system level, to say nothing of institutional policies (Burkhardt et al., 2015; Frum, 2007; Gildersleeve, Rumann, & Mondragon, 2010; Vargas, 2011). Again, it is this reliance on local discretion for policy interpretation that introduces a great deal of uncertainty into the enrollment management process. Under these conditions, SEM practitioners are in a particularly relevant role to effect change. For example, although policies related to undocumented immigrants and their rights, residency, and eligibility to access higher education such as the IIRIRA, DACA, and PRWORA² are often unclear, Burkhardt et al. (2015, p. 9) note, "States do not admit and register students. Colleges and univer-

sities do.” This brings into plain view the fundamental responsibility that SEM offices have in this process.

Once more, if the SEM function is decidedly focused on the inclusion and engagement of this group, then it must dedicate resources, adopt policies, and model practices that offer direct support, which are often found in frameworks and policy positions of national groups and professional associations. Moreover, much like the financial concerns mentioned before, faculty, staff, and administrators must each be part of the development of campus culture and policies aimed at providing an entry point for undocumented students (Kruger, 2016). This means developing expertise around government and institutional policies that impact and intersect with the student’s finances, status, enrollment eligibility, and residency requirements. A good example around status concerns is highlighted in Teranishi et al.’s (2015, p. i) study, which shows that of the 909 respondents, 65.9% had applied for and received DACA. Hence, some familiarity with this and other policies might be useful to those in SEM.

Finally, and most importantly, from an undocumented student’s point of view, their status often serves as the primary legal, emotional, and developmental impediment in higher education. As Gildersleeve (2010, p. 6) underscores when speaking about Carlitos, an undocumented student in California, “For the first time in his life, he was afforded the opportunity to safely indulge in the development of his mind.” The need to feel safe in higher education spaces requires thoughtful and deliberate action, resource allocation, and policies. Following are a few policy-oriented strategies outlined in the research literature (Burkhardt et al., 2015; Gildersleeve et al., 2010; Kruger, 2016) that SEM offices can adopt to meet these students’ needs:

1. Take advantage of existing frameworks and policy positions espoused by leaders and professionals as well as professional associations in the policy formulation process for undocumented students locally, statewide, and nationally. Moreover, SEM offices should consider adopting the National Association of Student Financial Aid Administra-

tors’ (Draeger, 2011) policy position on undocumented students. Additionally, the College Board provides useful policy guidance for admissions, financial aid, and advising professionals (College Board, 2016).

2. The ambiguity of the current policy environment, for better or for worse, offers broad interpretive capacities to campus actors and decision-makers in some instances, though this is not to suggest that this is the case across the board. Though institutions in states with more inclusive policies are more likely to share a similar policy position, the inverse may also be the case: system-wide and institutional policy decisions could influence how state legislatures choose among policy alternatives aimed at this group. Indeed, some states have left policy decisions related to undocumented students to the institution or public higher education systems (NCSL, 2014; Nguyen & Serna, 2014).
3. Provide policy training for those who will work with this group. Additionally, resources must be allocated to help facilitate enrollment. Because intersecting policies come to bear on the enrollment management process for this group, it is necessary for professionals and leaders to remain up to date with this often, variable policy environment. This includes sensitivity training around undocumented status, private financial resources, residency requirements, in-state tuition and state financial aid policies, and state enrollment policies. The U.S. Department of Education has compiled a list of resources available to higher education professionals.³
4. Likewise, the precollege conditions for undocumented students must be accounted for when considering the types of policies that SEM offices seek to adopt (Gildersleeve & Ranero, 2010; Gildersleeve et al., 2010). For example, a student may come from a family with differing legal statuses, family structures, or modes of entry into the country (Degiuli, 2011). All of these pose substantive concerns for their precollege characteristics and how they intersect with policy.

²IIRIRA is the 1996 Illegal Immigration Reform and Immigrant Responsibility Act; DACA is the 2012 Deferred Action for Childhood Arrivals; and PRWORA is the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (Cebulko & Silver, 2016; Degiuli, 2011; Olivas, 2012; NCSL, 2011).

³Available for free at <http://www2.ed.gov/about/overview/focus/supporting‐undocumented-youth.pdf>

5. Similarly, Kruger (2016) suggests taking up the application process from the perspective of an undocumented student. This recommendation is an excellent one in that it is often through understanding the jumble of policies and rules applicable to undocumented students' enrollment, financial aid, residency, and so on that SEM professionals can provide invaluable information during the college choice process.
6. Leaders must set the groundwork for policy discussions and adoption. It is up to SEM leaders to model how the institutions will facilitate not only the external components of the college choice process, but also how they expect staff, faculty, and administrators alike to provide policy guidance.
7. On a larger level, SEM can serve to advocate on behalf of these students for policies such as a federal or state DREAM Act to help facilitate more equitable access to higher education for this group (Kruger, 2016). However, it is local, long-term policies that can have the largest impact on undocumented student access and college-choice. While federal or state DREAM Acts would be ideal, the reality is that this may still be a long way off. Hence, the importance of institutional or system-wide policy decisions (Chen & Rhoads, 2016).

Finally, it is necessary to underscore that the guidance presented here is limited in nature. However, the hope is that it can serve as a foundation for more inclusive policy discussion and implementation for undocumented students from the perspective of the SEM office. This leads to the last set of considerations around inclusive practice and student perceptions.

Inclusive Practice and Student Perceptions

In describing the financial and policy environment for undocumented students on campuses, in systems, and across the states, at least two topics warrant further discussion: inclusive practice and undocumented student perceptions and fit on campus. This is particularly relevant for SEM offices since they are the gatekeepers of higher education. They are the primary conduit of information about campuses and higher

education in general. Hence, advising undocumented students through the college choice process is decidedly related to how professionals and leaders in SEM responsibly frame and represent the campus climate for, and resources and support available to, undocumented students. The technical components highlighted earlier in this article simply set the stage for how students perceive higher education and their place within it. Inclusive practice is where the rubber meets the proverbial road.

If the "mantra" of higher education (Munoz & Escalante, 2015, p. 165) is indeed to support diversity, inclusion, and equity, the result is that SEM, like any other part of higher education, must engage in careful, reflexive practice. By taking the research literature and translating it into actionable strategies, individuals who work with this population can engage in a much more developmentally appropriate fashion when seeking to support undocumented students based on the common obstacles they face in terms of safe spaces and relationship building across the educational landscape and with nontraditional allies. Moreover, this would mean that inclusive practice would include undocumented student leadership and voice within institutional discourses, careful consideration of contradictory policy stances, and the symbolic nature of larger policy actions for the sense of inclusivity this group might feel on campus. Each of these is considered in turn.

1. Provide social support and a safe space for undocumented students to engage in discussions around their status and the fears associated with them (Canedo-Sanchez & So, 2015; Suarez-Orozco et al., 2015). The inclusion of such a space in the college choice process can help alleviate some of the fear many undocumented students feel when seeking to participate in higher education. Moreover, SEM offices should also seek to understand what Serna (2015) describes as the insider/outsider narrative that dominates this discourse and which Gonzales (2016) and King and Puntí (2012) note can lead to discouragement, anger, and frustration among undocumented students.
2. Reaching out to high schools and other higher education institutions can result in meaningful relationship building and set in place clear

pathways to college access and college-going literacy (Nienhusser, 2013a; Perez, 2010). In fact, a largely untapped resource for SEM offices seeking to engage undocumented students is teachers (Zarate & Burciaga, 2010). Since they work so closely with students, they can serve as an ideal partner in facilitating the college-going process for this group of students. Furthermore, teachers are generally familiar with the fact that these students have high aspirations, face many social and political obstacles, and that their liminal status can work to form conflicted identities, especially in terms of insider and outsider identities (Gonzales, 2016; Torres & Wicks-Asbun, 2014).

3. Develop a set of nontraditional allies in the SEM office and its work. As noted previously, external groups can often play an instrumental role in making students feel like they belong in higher education. Canedo-Sanchez and So (2015) and Chen and Rhoads (2016) each underscore that working with organizations and communities outside of the institution can be highly beneficial for supporting undocumented students. However, this does not suggest that intra-institutional relationships should be ignored. Indeed, students themselves are sometimes an overlooked group of allies.
4. In that vein, it is essential that the SEM office recognize that undocumented students' social activism is a way to harness their leadership abilities and pursue self-empowerment. In fact, research has shown that student activism can lead not only to better outcomes, but to enhanced concern for social justice overall (Chen & Rhoads, 2016; DeAngelo, Schuster, & Stebleton, 2016; Munoz & Escalante, 2015).
5. Remain mindful when facing contradictions within the institution. SEM offices, like any other part of higher education, are made up of people. In this instance, SEM leaders and practitioners can help to raise consciousness and confront inconsistencies in the college-going process that arise in SEM for undocumented students (Chen & Rhoads, 2016). Canedo-Sanchez and So (2015, p. 472) suggest creating a red-, yellow-, and green-light system

that helps institutional leaders examine their own policies and processes. This can easily be adapted to SEM by determining which areas do not require status information, those that might but do not clearly outline this information, and, finally, those that unequivocally require such information.

6. Recognize the effects of "symbolic" state and institutional policies on the perceptions of undocumented students. The sociopolitical environment of the states has been shown to clearly influence how students view their place in higher education, especially when restrictive state or institutional policies are employed (Burkhardt et al., 2012; Cebulko & Silver, 2016; Frum, 2007; Garibay et al., 2016; Gildersleeve et al., 2010; Nguyen & Serna, 2014; Ovink et al., 2016). Indeed, research has shown that these in-state tuition policies for undocumented students have resulted in increased enrollments (Flores, 2010a, b; Kaushal, 2008).
7. Finally, work to develop an "Undocuwelcoming" campus (Suarez et al., 2015). This means acknowledging that undocumented students are not a monolithic population. Though a significant number of undocumented students come from Latin America and Mexico (Flores, 2010a, b; Passel & Cohn, 2012), the number coming from other parts of the world is on the rise (Abrego & Gonzales, 2010; Buenavista & Tran, 2010; Degiuli, 2011; Passel, 2005), hence the significance of recognizing these differences. Still, on the whole, developing a welcoming campus environment for undocumented students has been shown to matter a great deal in their college choice process (Suarez-Orozco et al., 2015). Indeed, a useful model for SEM offices is presented by Richards and Bohorquez⁴ (2015), who suggest holding an "undocuweek" to help create a more welcoming environment in addition to other possible activities.

To help make undocumented students feel welcomed on college campuses across the country, it is becoming ever more clear that the SEM function has a critical part to play. The advice given in this section

⁴Freely available at http://unitedwedream.org/wpcontent/uploads/2015/01/UWDN_InstitutionalToolKit_final-1.pdf

only begins to scratch the surface of what SEM can do. However, by engaging in soundly supported, inclusive practice, SEM leaders and practitioners can proceed with confidence when working toward changing undocumented students' perceptions of their place in higher education and on campus, as well as in society.

Implications for SEM and Beyond

The numerous financial and policy obstacles impacting higher education access for undocumented students can often result in limited educational opportunities for this population. Given that the federal efforts around comprehensive immigration legislation have been hindered and that some states have taken up policy positions with regard to undocumented students, this article has attempted to present a research-based direction for SEM offices struggling with how to support this population. This brief analysis has outlined these actions and highlighted some ways in which SEM can help undocumented students to overcome many of the sociopolitical obstacles facing them, while including guidance around how campuses can help them feel more welcome through inclusive practice.

Another primary aim of this article is to expose those who have limited experience working with undocumented populations to the factors and obstacles they encounter in the college choice process. This article will hopefully assist SEM leaders and practitioners to relate their work back to the social justice implications of this topic. Because these students are often some of the most marginalized, research focusing on their experiences within SEM is sorely lacking. Indeed, even high-level decision makers are often uncertain how to make their inclusion in campus communities a priority. It is hoped that this article will set the groundwork for deeper conversation that only begins with SEM, to be continued on campuses and in offices across higher education.

Finally, because the SEM function serves as the gateway for student entry and access to higher education, it is ever more important that those leading and working in SEM are familiar with the policies and laws governing undocumented students' status and ability to access resources at colleges and universities. What is generally concerning is that many undocumented students grew up in the United States, are decidedly part

of their communities, and graduated from local high schools (NCSL, 2011, 2014; Nguyen & Serna, 2014). In other words, these are *our* students. Most grew up in the United States; speak English; attended elementary, middle, and high school; wish to attend college; and wish to become U.S. citizens (Educators for Fair Consideration, 2012). It is in this context that as a mechanism for social inclusion, equity, and financial well-being, higher education has a responsibility to this group like any other. Given that nearly 65,000 undocumented students graduate from U.S. high schools each year (Abrego & Gonzales, 2010; Dougherty, Nienhusser, & Vega 2010; Passel, 2005), the plight of this population should be of interest to those charged with SEM duties across the board but especially those associated with the college choice process.

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