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The legacy of *Plyler v. Doe*: A critical window of inclusion

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ABSTRACT

This study examines whether the 1982 *Plyler v. Doe* Supreme Court decision increased school participation among Latino K–12 students likely to be undocumented in Texas. The analysis asks whether removing tuition and enrollment barriers changed participation patterns relative to comparable states without similar exclusionary statutes. To address limitations in citizenship measurement in schools, we employ a dual-dataset strategy that triangulates district-level enrollment data from the Civil Rights Data Collection with individual-level demographic and school attendance data from the American Community Survey. Using quasi-experimental comparisons across states and age cohorts most likely affected by the decision, we find that Latino student participation increased in Texas following *Plyler*, with gains concentrated among age groups eligible for protection and broadly shared across gender, with suggestive evidence of larger effects among lower-income students. The study contributes suggestive evidence, from proxy-based quasi-experimental analyses, consistent with legal access to schooling shaping participation, informing current debates over immigrant educational rights and their broader social and economic returns.

Keywords: immigrant students; education law; Latinos; civil rights

I. Introduction

Fifty years ago, in 1975, the Texas Legislature enacted Texas Education Code §21.031, a statute containing two central provisions: it allowed school districts to (1) withhold state funds designated for educating children who were not "legally admitted" to the United States, and (2) deny enrollment or charge tuition to those same children. In response, four families of undocumented students in Tyler, Texas, filed suit under the pseudonym Doe, arguing that the law violated the Equal Protection Clause of the Fourteenth Amendment. Both state and federal courts ruled the statute unconstitutional, but the Tyler Independent School District, led by Superintendent John Plyler, appealed to the U.S. Supreme Court.
In 1982, the U.S. Supreme Court issued its landmark decision in *Plyler v. Doe*, striking down the statute and affirming that undocumented children could not be denied a free public education. The Court's narrow 5–4 ruling remains one of the most consequential decisions in U.S. educational and civil rights history, affirming equal access to public schooling regardless of citizenship status. Its legacy extends beyond the immediate plaintiffs, shaping the educational trajectories of Hispanic families, subsequent generations of both citizens and noncitizens, and the U.S. economy itself.[1]

Nonetheless, this right is once again under renewed legal and political threat. At least five states—including Texas—are actively challenging the *Plyler* decision, reviving efforts to restrict immigrant children's access to public schooling (Muñiz, 2021; Najarro & Franco Brown, 2025). These developments are not isolated; they are part of a broader rollback of legal protections for undocumented residents. Texas has also led efforts to eliminate Deferred Action for Childhood Arrivals (DACA) recipients' lawful work authorization (Texas v. U.S., 2025) and to bar undocumented graduates of Texas high schools from

receiving in-state tuition (U.S. v. Texas, 2025). Despite empirical evidence showing positive returns to the state's in-state tuition policy on college enrollment (Flores, 2010), the law was rescinded by judicial order, bypassing the legislative process and raising concerns about the durability of educational rights more broadly. Together, these actions signal a new phase in the erosion of immigrant educational protections, positioning the *Plyler* precedent itself as a potential target. Examining the effects of the *Plyler* decision on Texas and the students most likely affected therefore offers an opportunity to assess what this intervention did or did not accomplish for the welfare of the state's educational institutions and residents. It also provides a moment to reflect on whether the benefits anticipated by the Court were realized or whether unintended costs emerged.

The Supreme Court's opinion in *Plyler* warned that creating an underclass of uneducated residents would ultimately harm a state's civic and economic welfare (*Plyler v. Doe,* 1982). Ironically, the ban on free public education challenged in *Plyler* was largely unique to Texas among states with large Hispanic populations. In contrast, California's *Mendez* (1948) decision declared racial segregation in schools illegal, and the ruling went unchallenged, leaving segregation patterns primarily locally driven rather than mandated by state law as in Texas (Antman & Cortes, 2023).

Despite this landmark ruling, few quantitative studies have examined how students and schools directly affected by the *Plyler v. Doe* decision during that window in time fared in Texas classrooms or how their families might have been directly impacted by the decision. This paper addresses that gap by estimating the effects of *Plyler v. Doe* using both school-level and individual-level outcomes. By examining Texas as the policy-affected

("treatment") state and comparing it to states not directly influenced by the removal of legal barriers to public schooling ("counterfactual"), we ask:

1. Did *Plyler v. Doe* expand educational access in public K-12 schools for undocumented Hispanic youth in Texas?
2. How did it affect the classroom composition—specifically in terms of access, diversity, and segregation?

We employ a quasi-experimental comparison with states that had similar student populations but no statewide law barring undocumented students from free K–12 education. Specifically, we focus on a tight Plyler-eligible age window, students most likely to have benefited from the removal of tuition and enrollment barriers, using a dual-dataset design that combines the institutional strengths of the U.S. Department of Education's Civil Rights Data Collection (CRDC), which provides school-level district information, with the individual-level precision of the American Community Survey collected by the U.S. Census Bureau. Together, these data triangulate the educational effects of *Plyler v. Doe* on students likely to be undocumented in Texas before and after the 1982 decision.

Section II reviews recent literature on immigration-related laws and policies affecting educational and, in some cases, economic outcomes for students with undocumented immigrant status. Section III presents the theoretical motivation guiding the study. Section IV describes the data. Section V discusses the empirical strategy and presents results triangulating evidence across datasets. Finally, Section VI discusses implications for educators, policymakers, and researchers.

Section II: Demographic designation, legal battles for identity and inclusion, and the exclusion of undocumented children

"Hispanics" as a developing demographic category

The 1970s was a particularly polarizing decade for many states across the country due to major changes in immigration policy, economic restructuring, and new demographic measurement procedures implemented across several federal data systems—most notably the U.S. Census and the Civil Rights Data Collection (Siegel & Passel, 1979). The population most affected by these developments in migration, economic transitions, and measurement reform were Hispanics, a category formally introduced by the U.S. Census in 1970 to identify individuals by national origin and region of birth (Pew Research Center, 2015; Siegel & Passel, 1979).

This new classification added a distinct demographic dimension to U.S. population data just as large numbers of immigrants began arriving under the Immigration and Nationality Act of 1965 (the Hart–Celler Act), which ended national-origin quotas and opened the door to greater migration from Latin America. By 1980, the share of immigrants arriving from Mexico and Central and South America had risen dramatically (Pew Research Center, 2015). Census analyses later showed that the number of individuals identifying as of Hispanic origin grew by more than sixty percent from 1970 to 1980, although researchers also acknowledged substantial undercounts in 1970 when Hispanic identity was still estimated through a Spanish-surname proxy (Siegel & Passel, 1979).

California reported the largest number of residents of Hispanic origin, followed by Texas, whose economy was then experiencing an energy and industrial boom supported by increased labor supply from both internal and international migration (De León, 2023; Federal Reserve Bank of Dallas, 2015). In Texas, rising Hispanic birthrates and immigration simultaneously fueled economic growth and heightened public visibility in sectors such as education, health, and politics—generating an atmosphere of both opportunity and anxiety (Gonzales, 2022). During this same period, demand for bilingual education increased, creating pressing needs for qualified teachers, culturally responsive curricula, and expanded resource allocations across school districts (Funk & Lopez, 2022).

Although the federal government did not formally recognize Hispanic identity until 1970—previously categorizing such families primarily by surname—the schooling experiences of Latino students long reflected multidimensional and enduring discrimination. This history includes racial and linguistic segregation, inequitable school funding, misuse of standardized testing for high-stakes tracking and graduation decisions, and limited access to postsecondary education (Kauffman, 2019)

Legal battles for inclusion

Legal challenges mounted by Mexican American families in defense of their children began as early as the 1930s in Texas. In *Del Rio Independent School District v. Salvatierra* (1930), courts reviewed the segregation of Mexican children in public schools (Orozco, 2011). Although the plaintiffs lost—the decision effectively legalizing segregation of Mexican students through the third grade—the case ignited growing momentum among Mexican

American civil-rights organizations. This advocacy culminated in *Delgado v. Bastrop Independent School District* (1948), when a federal district court in Texas ruled that maintaining separate schools for children of Mexican descent violated the Equal Protection Clause of the Fourteenth Amendment (Orozco, 2011).

Yet enforcement lagged for more than two decades. Not until *Cisneros v. Corpus Christi ISD* (1971) did courts formally extend *Brown v. Board of Education* (1954) protections to Mexican Americans, recognizing them as a minority group subject to unconstitutional segregation and discrimination (Allsup, 2020). The racial ambiguity and legal uncertainty surrounding Latino identity delayed equal-protection enforcement for what would become the nation's fastest-growing minority—one poised to become the majority in Texas public schools and eventually in the state overall.

The onset of the 1970s marked a dual recognition in both law and data. With *Cisneros v. Corpus Christi Independent School District* (1971), Mexican Americans were legally acknowledged as a discriminated-against group despite more than a century of documented prejudice and exclusion. Simultaneously, the 1970 Census introduced the formal ethnic identifier "Hispanic," making visible a population long obscured in official statistics. Legal battles over the educational rights of Mexican-origin children had primarily focused on race. Only after *Cisneros* established Mexican Americans as a protected group did Texas enact the 1975 statute requiring undocumented children to pay tuition to attend public K–12 schools, shifting exclusion from racial segregation toward restrictions based on citizenship status.

Transition toward Plyler and empirical focus

It is to the complex measurement of Hispanic student identity, both before and after *Plyler v. Doe*, that we now turn. Drawing on two key datasets that capture classroom composition and school participation, the analysis examines how the *Plyler v. Doe* (1982) decision influenced educational access and participation among Hispanic students in Texas during this pivotal period. This moment represents a convergence of developments: the formal introduction of "Hispanic" as a demographic identifier across federal datasets and the legal affirmation of schooling rights for all children regardless of race or citizenship status.

The Plyler Projection Reports

Two recent studies estimate the economic effects of the *Plyler* decision warrant attention, as they project the long-term benefits and potential costs associated with the ruling.

In *The Power of Plyler* (2025), the authors estimate that schooling protections established by the 1982 Supreme Court decision generated more than $630 billion in net benefits after accounting for educational costs. Framed as a national investment with long-term returns extending beyond education into labor market participation, tax revenues, and health outcomes, the report links contemporary data on immigrant individuals who would have benefited from *Plyler* to ACS and IRS records to estimate economic effects through imputation-based counterfactual models applied to recent cohorts. In sum, the authors model schooling access under *Plyler* in terms of economic and social outcomes for individuals potentially covered by the decision and residing in the United States in 2023.

In a related methodological report, Ortega (2025) models how removing *Plyler*

protections—and thereby reducing schooling participation—would alter earnings trajectories and life-course outcomes for current undocumented students. Ortega estimates that approximately 4.8 million children have been exposed to or covered by the *Plyler* decision since its inception, including roughly 1.8 million children in 2023. Nearly three million adults have benefited from the ruling, providing insight into economic contributions accumulated across states and nationally and highlighting the contemporary urgency of this issue.

While these studies do not offer analyses focused on the initial implementation window of the *Plyler* decision, their projections underscore the substantial

economic and social implications of educational access. They also highlight the potential loss of human capital formation, civic participation, and intergenerational mobility that could result from reversing such protections. These reports therefore establish the contemporary importance of *Plyler* while leaving open the need for evidence consistent with how participation changed when the law was first implemented.

The following section presents the theoretical framework guiding this study, focusing on how undocumented families are likely to respond to legal barriers and access constraints when making schooling decisions for their children.

Section III: Theoretical Motivation

Frameworks explaining the academic performance or participation of immigrant students in U.S. schools have evolved since the 2000s. Many of these frameworks focus on achievement

patterns, resilience processes, and incorporation or adaptation to the contexts in which immigrant students and their families settle in the United States (Feliciano & Lanuza, 2017; Portes & Fernandez-Kelly, 2008; Portes & Rumbaut, 2006; Suárez-Orozco, Pimentel, & Martin, M., 2009). Generational status, citizenship status, or lack of citizenship upon arrival has also been shown to play a large role not only in educational attainment but also in wages, employment status, and occupational entry (Flores, Carroll & Lyons, 2021; Oreopoulos, 2011). Gonzales's (2011) work, *Learning to be Illegal,* is one of the first pieces to incorporate the role of the effect of immigration law realities on the life stages of college-aged young adults. Noting the benefits of the *Plyler* decision as a foundation for the opportunity for students to believe they will have the same opportunities as others to attain a college degree, Gonzales documents the stark realizations regarding work and education that undocumented students who are college-eligible and ready must now mediate as a result of their liminal and uncertain statuses based on where they live. In this case, however, our focus is on participation behavior among immigrant students and, by extension, their families or parents who send students to school in response to shifts in legal access and to the perceived benefits or threats associated with attending school or avoiding participation altogether. To explain this participation, we focus on four components of a framework.

The first component describes the schooling environment prior to *Plyler* through the concept of liminal legality. From legal scholarship, legality, introduced widely by Cecilia Menjívar (2006), and utilized by various scholars since, refers to an ambiguous and precarious legal status in which immigrants inhabit a gray area where they are neither fully documented nor hold permanent residence or citizenship (Gonzales, 2011; Shaw, 2016). Menjívar's &

Agadjanian (2022) recent work assigns this form of legal liminality to individuals holding temporary protected status, primarily from Central America, who may live and work in the U.S. with authorization but without a pathway to citizenship. Students who applied for DACA are similarly situated in this liminal space, where they can reside and sometimes work but lack permanent status, resulting in prolonged uncertainty regarding their future in the U.S. in various ways.

Undocumented students and their families have faced this liminal legality, and in many cases complete uncertainty due to lack of citizenship for many decades. Prior to the 1975 statute, however, undocumented students were still able to attend school without a formal law requiring

tuition payments. However, once the statute passed, Texas created a legal financial requirement that led to a climate of exclusion that persisted at least until the law was dismantled by the 1982 *Plyler* decision.

This leads to the second component of the framework: the chilling effect. A chilling effect, as it pertains to schools and families, occurs when policies or laws generate enough fear or uncertainty to discourage individuals from engaging in lawful behavior—in this case, school attendance—even when participation is legally permitted (Sykes, 2021). This is particularly harmful in the context of education, where children lose access to schooling. The chilling effect may also extend to teachers and administrators who operate within uncertain legal environments. After the 1975 law went into effect, legal ambiguity was replaced with formal

exclusion: undocumented students could attend school only if tuition was paid although some districts barred attendance based on citizenship status alone. Because undocumented parents were often limited to low-wage employment, many families could not afford tuition. Even when tuition could be paid for one child, families often could not afford to pay for all children. Moreover, families may have feared that children attending school—even with paid tuition—could expose household immigration status and increase risk for the family.

Matthew Shaw (2016) utilizes liminal legality with Becker's human capital theory, our third framework component, to explain educational decisions under legal barriers faced by immigrant students (Shaw, 2016; Becker, 1993). Under Becker's model, individuals decide whether to invest in education by weighing expected benefits against costs. If benefits exceed costs, enrollment is likely. Shaw argues that this calculation operates differently for undocumented

students because schooling costs include not only tuition but also risks of deportation, uncertainty surrounding legal status, potential family risks, and social stigma.

When the 1975 law passed, K–12 education, previously free, became financially and socially costly for undocumented families. For households with multiple children, schooling costs likely exceeded perceived benefits, reducing participation. However, once the *Plyler* decision removed tuition requirements and schools no longer needed to inquire about documentation status, schooling again became free and, for many families, safe to access. As a result, the benefits of school attendance increased while perceived costs declined. This restored access also reopened the pathway toward high school completion, which in turn

served as the gateway eligibility milestone for college attendance in the United States.

The concepts of liminal legality, behavioral response to a chilling atmosphere against immigrant students and their families, individual decisions on the benefits and costs to risk attaining an education in uncertain local and state contexts, and our fourth component, the centrality of the family in educational decisionmaking related to schooling, play an outsized role in whether an undocumented student ultimately is likely to participate in public schooling environments such as the one in Texas. This latter component, family-based decisionmaking, has been identified as a central element within Latino families ranging from reasons of cultural understanding, financial support and risk, and issues of safety (Gandara and Contreras 2009; Pérez & Ceja, 2015; Rios-Aguilar & Kiyama, 2012). Although this period represented highly complex and courageous circumstances, in its simplest form, when access becomes costly or legally uncertain, participation declines; when barriers are removed, participation should increase among those most exposed to those constraints, if families see the value of the decision together.

The *Plyler v. Doe* decision offers an opportunity to test this prediction. By eliminating tuition requirements and clarifying undocumented students' right to public education, the decision reduced both the direct and perceived costs of schooling. The question then becomes whether these legal changes produced observable changes in school participation among Latino students likely to have been undocumented in Texas. The following section outlines the research design and data used to examine this question.

Section IV: Data Description

This study employs a two-part design to study individual-level and classroom-level analyses

to evaluate how *Plyler v. Doe* (1982) shaped educational access and attainment among Hispanic students in Texas. We employ a complementary dual-dataset design that leverages the institutional strengths of the CRDC and the individual-level precision of the ACS to triangulate the educational effects of *Plyler v. Doe*. Together, these datasets allow us to identify changes in school access, validate the affected population, and estimate quasi-experimental, suggestive impacts on educational participation and attainment as a result of the 1982 U.S. Supreme Court decision. The first component draws on the U.S. Census and the American Community Survey (ACS) microdata (1980–1990) to estimate individual-level enrollment outcomes while the second utilizes Civil Rights Data Collection (CRDC, 1968–1992) to examine classroom-level access patterns. We begin with the Census datasets to validate the population of interest since the CRDC does not collect information on citizenship. With the census and ACS, however, we are able to use foreign-born, non-citizen Hispanics as a proxy for undocumented students, confirm school-age composition, and demonstrate that Texas differs meaningfully from comparison states used as a comparison group. In part II, the CRDC allows additional triangulation by providing critical institutional evidence of the changes in school participation in Texas as compared to states that did not experience the restricted legal statutes, patterns in enrollment by race and ethnicity, as well as concentrated enrollment by race and ethnicity by district in an already highly segregated state. In sum, this triangulated dual-dataset strategy links institutional enrollment shifts to individual educational outcomes.

Summary of Design and Data Limitations

Each dataset in this two-part analysis offers distinct methodological strengths and unavoidable constraints shaped by its purpose and design. The Civil Rights Data Collection

(CRDC), administered by the U.S. Department of Education's Office for Civil Rights, provides the earliest nationally comparable data on school-level racial and ethnic enrollment, bilingual education participation, and linguistic indicators relevant to Latino students before and after *Plyler v. Doe* (1982). Its administrative precision enables identification of district and regional variation in access and school composition, especially in South and Central Texas, where enrollment growth was steepest. However, the CRDC does not capture citizenship or immigration status, limiting its ability to directly identify undocumented students. Furthermore, pre-1992 CRDC surveys include inconsistent definitions for Limited English Proficient (LEP) and bilingual education categories, complicating cross-year comparability. Despite these constraints, the dataset provides a useful institutional record of school access by race, ethnicity, and other factors related to educational opportunity. Although not the subject of interest for this analysis, various authors have examined the status of segregation patterns by operationalizing exposure and evenness indices to capture Latino-White, Black-White, and Asian-White segregation dynamics (Reardon and Firebaugh, 2002).

The American Community Survey (ACS) and historical decennial Census microdata (1980, 1990, 2000), accessed through IPUMS, complement these institutional data by providing individual-level demographic, nativity, and educational attainment variables unavailable in CRDC files. The ACS analysis focuses on foreign-born, non-citizen Latinos aged 18–28 who resided in Texas five years prior to the survey, using years of education completed as the outcome measure. We are looking at individuals between 18 and 28 years of age at the time of the survey. These individuals are old enough to have finished high school, but not

too old so we can use their state of residence five years before the survey (when they were 13 to 23) as a proxy for the state they went to school in (we only study individuals who were in one of the US states five years before the survey years). These people were born between 1953-1982, and under 23 (or unborn) in 1975 (beginning of tuition collection) and already born when Plyler started (1982).

For the main results, we limit our sample to Foreign-born non-citizen Latinos who arrived in the United States before 1990 and were born in the Ame990ricas (or country of birth is unknown).[4] We further limit our sample to individuals who did not go to college since (1) they can be potentially international students, and (2) we cannot observe their final level of education yet (since they are still 18-28).

Definition of treatment and control group

Since *Plyler v. Doe* went into effect in 1982, we assume that undocumented students who were six years old or younger at that time did not face tuition and/or admission barriers to attending a K-12 public school. However, students who were of school age in 1982 were at least partially affected by the decision. In the main analysis, we define students who were 12 or younger in 1982 (born in or after 1970) as the treatment cohorts. Although defining treatment and control cohorts appears challenging, we run robustness checks to show that our results are not sensitive to this choice. Additionally, we estimate cohort-specific treatment effects to ensure that all cohorts born in or after 1970 were similarly affected.

We define individuals who lived in Texas five years before the survey year (used as a proxy

for the state where they attended school) as the treatment group. Although undocumented students in other states may also have benefited from *Plyler v. Doe*, we are unable to estimate its effect on those individuals because the extent of restrictions on undocumented students likely varied across districts and schools. Texas, however, was the only state with a statewide law requiring tuition payments from undocumented students. Our difference-in-differences identification strategy compares changes in educational attainment between undocumented students in Texas and those in other states before and after *Plyler v. Doe*. Therefore, any potential increases in educational attainment in other states would attenuate our estimates, implying that our estimates represent a lower bound of the actual treatment effect.

In addition, because we cannot perfectly identify treated (undocumented) individuals in the data, the estimated treatment effect reflects an average effect across undocumented students and some documented students (who should not be affected by *Plyler v. Doe*), further attenuating our results.

We note that while the ACS enables a direct approximation of *Plyler*'s immediate and long-term human capital effects, its sampling design limits geographic precision. That is, school districts cannot be directly linked to respondents, and treatment assignment by state of schooling is inferred from prior residence rather than observed directly.

Together, these datasets create a triangulated analytic framework: the CRDC captures the institutional effects of *Plyler* on school entry, while the ACS captures the individual-level participation outcomes by age, gender, and income level. This dual design situates *Plyler v. Doe* within both the structural and human dimensions of educational access—triangulating the policy's immediate outcomes in Texas public K-12 classrooms to individual participation

patterns of students likely to be the most likely beneficiaries of this monumental legal decision.

Part I: ACS – Individual-Level Attainment and Policy Outcomes (1980 and 1990)

The ACS analysis employs IPUMS microdata from the 1980 and 1990 Census 5% state samples to estimate the educational effects of *Plyler* among undocumented immigrant children. While being an undocumented immigrant is not directly observable, we use foreign-born, non-citizen Hispanic as a proxy. The analytic sample includes individuals at school age (5 to 18 years old) at the time of the survey, and the goal is to compare the average changes in school attendance among the sampled students before and after *Plyler v. Doe (1982)* between Texas and the rest of the states. More details about the estimation strategy are provided in section V.[2]

Table 1 presents covariate balance between Texas and other states for foreign-born, non-citizen Hispanics, the population most directly affected by Plyler v. Doe. Panel A reports pre-treatment covariate levels in 1980, while Panel B reports pre–post changes between 1980 and 1990. Because the treatment consists of a single state, normalized differences are computed relative to the dispersion across control states and are intended as descriptive measures rather than formal hypothesis tests.

Table 1 about here

Panel A shows that Texas differed from other states along several baseline dimensions prior to the policy. Most notably, school enrollment among foreign-born non-citizen Hispanics was substantially lower in Texas in 1980 than in other states. Texas also had lower median

income and larger average family size, reflecting socioeconomic differences that are relevant for educational participation. In addition, the composition of the Hispanic population in Texas was markedly different: a much larger share of individuals was born in Mexico, and correspondingly smaller shares were born in Central America, South America, or the Caribbean. These differences reflect long-standing migration patterns and underscore that Texas represents a distinct educational and demographic context rather than a marginally treated unit.

Panel B focuses on pre–post changes in covariates, which are more informative for assessing the plausibility of the difference-in-differences design. School enrollment increased sharply in Texas between 1980 and 1990, while declining in other states over the same period, resulting in a large positive normalized difference. This pattern is consistent with a positive effect of Plyler v. Doe on school participation among undocumented immigrant children in Texas. Changes in age composition and family size also differ somewhat across groups, while changes in median income are broadly similar, suggesting that the enrollment gains in Texas are unlikely to be driven solely by differential income trends. Changes in place-of-birth composition are modest relative to level differences, indicating that the sharp enrollment increase in Texas is not simply due to compositional shifts within the foreign-born Hispanic population. Taken together, the table highlights two key points relevant for the educational interpretation of the results. First, Texas differed substantially from other states in baseline characteristics, particularly in enrollment levels and immigrant-origin composition, which is expected in a single-state policy analysis. Second, and more importantly for identification, enrollment trends diverged sharply after the policy

change in a manner consistent with expanded access to public education following *Plyler v. Doe*. These patterns motivate the difference-in-differences approach used in the analysis and support interpreting post-1980 enrollment gains in Texas as reflecting the policy's impact rather than pre-existing trends.

Figure 1 plots age-specific school enrollment rates for foreign-born non-citizen Hispanics in Texas and in other states, comparing 1980 (pre–*Plyler v. Doe*) to 1990 (post). The left panel shows trends for Texas while the right panel shows corresponding trends for other states. In Texas, enrollment rates increased between 1980 and 1990 for nearly all school-age children. The gains are visible across the core compulsory schooling ages, roughly ages 6 through 14, where enrollment was already high in 1980 but rose further by 1990. Importantly, the largest increases appear at younger ages, particularly among children around ages 6 to 8, where enrollment rates in 1980 were substantially lower and increased sharply by 1990. Enrollment also rose at older ages, including among adolescents approaching the upper bound of compulsory schooling, although levels remain lower than for younger children. These patterns suggest a broad-based increase in school participation following *Plyler v. Doe*, rather than changes concentrated at a single age.

In contrast, the right panel shows that enrollment trends in other states were comparatively stable over the same period. Enrollment rates were already high for most school-age children in 1980 and exhibit only modest changes by 1990, with declines at older ages that mirror typical age-related dropout patterns. The absence of comparable upward shifts in other states

highlights the distinct post-1980 enrollment gains observed in Texas. Taken together, the figures indicate that for almost all ages, school enrollment among foreign-born non-citizen Hispanics increased in Texas after *Plyler v. Doe*, while enrollment patterns in other states remained largely unchanged. The age-profile evidence is consistent with the interpretation that expanded access to public education following the Supreme Court decision led to higher school participation across a wide range of ages, reinforcing the difference-in-differences findings reported in the main analysis.

Figure 1 about here

Part II: CRDC – Classroom-Level Access and Composition (1968–1992)

The CRDC analysis documents the changes in school enrollment and racial/ethnic composition in different public schools across the United States before and after *Plyler*. Using school-level data, we examine whether classroom access expanded for Latino students following the 1982 *Plyler* decision. The data suggest that *Plyler* effectively and quickly increased school entry for Latino children, including a number of them who may have been undocumented. We note that while the primary advantage of the CRDC data is that it allows for analysis of racial composition at the school level, inconsistencies in data collection across years prevent the consistent identification of schools, districts, and cities over time. As a result, our analyses using the CRDC are necessarily conducted at the state level.

Figure 2 shows the national share of students by race from the Civil Rights Data Collection (CRDC), where the Hispanic share of all U.S. K–12 students rose from approximately 4.4

percent in 1968 (labeled “Spanish surname”) to 12.8 percent in 1992 (labeled “Hispanic”). That is the percent of Latino identified students tripled from 1968 to 1992. Moreover, the overall demographic expansion of the Latino population continued to experience significant growth that continued into the 2000s (not shown here).

Figure 2 about here

Figure 3 plots the share of Latino students over time in Texas and in other states, with the dashed vertical line marking the 1982 *Plyler v. Doe* decision. Prior to 1982, when Texas Education Code §21.031 restricted access to public K–12 schooling for undocumented children by either barring enrollment or charging tuition, the Latino student share in Texas rose gradually and largely in parallel with trends in other states. In contrast, immediately following the Supreme Court’s decision, the Latino share in Texas increased sharply, rising from approximately 25 percent in 1982 to over 40 percent by 1984. Over the same period, other states experienced only a modest increase of less than three percentage points.

The abrupt divergence after 1982 suggests a discrete change in school participation among Latino children in Texas that is not mirrored elsewhere. This timing and magnitude are consistent with *Plyler v. Doe* expanding access to public education for previously excluded undocumented students, leading to a rapid increase in Latino enrollment in Texas schools. While longer-run demographic trends may also influence Latino shares, the sharp post-1982 break in Texas relative to other states highlights the importance of the policy change in shaping educational participation during this period.

Figure 3 about here

Section V: Empirical strategy and results

Part 1: The effect of *Plyler* on school enrollment of undocumented immigrant children

This part of the analysis uses the American Community Survey (ACS) microdata 5% state samples in 1980 and 1990 (the earliest samples before and after *Plyler v. Doe 1982).* We limit the sample to children at school age (5 to 18 years old). Since the immigration status of individuals is not reported in the data set, we proxy undocumented immigrant children by identifying individuals who are Hispanic, foreign-born, and non-citizen. We cannot perfectly identify affected (undocumented) individuals in the data. So, the estimated treatment effect reflects an average effect across undocumented students and some documented students (who should not be affected by *Plyler v. Doe*), attenuating our results.

As previously noted, we define children living in Texas as the treatment group. Although undocumented students in other states may also have benefited from *Plyler v. Doe*, we are unable to estimate its causal effect on those individuals because the extent of initial restrictions on undocumented students likely varied across districts and schools. Texas, however, was the only state with a statewide law requiring tuition payments from undocumented students.

Our difference-in-differences identification strategy compares changes in school enrollment between undocumented students (proxied by Hispanic, foreign-born, and non-citizen) in Texas and those in other states before and after *Plyler v. Doe*. Therefore, its potentially

positive causal impact in enrollment in other states would attenuate our estimates, implying that our estimates represent a lower bound of the actual treatment effect, and they should be interpreted as suggestive quasi-experimental evidence on undocumented status.

We use the following regression specification for the difference-in-differences identification strategy:

$$y_{st} = \alpha + \delta_t + \gamma_s + \beta D_{st} + X_{it}.\theta + \epsilon_{st}$$

Where y_{st} is the average enrollment rate among studied children in state s at year t, δ_t represents the fixed effect for each census year, γ_s indicates the state-level fixed effects, D_{st} is the treatment indicator which is equal to one only for children in the school age during the 1990 census and residing in Texas, X_{it} captures state-level demographic controls, and ϵ_{st} represents a mean-independent error term. The main parameter of interest as the *treatment effect* is β which captures the additional changes in school enrollment in Texas relative to other states after *Plyler v. Doe*. This *difference-in-differences* coefficient is interpreted as the suggestive evidence of the effect of Plyler *v. Doe* on the school enrollment of the affected children in Texas.

To improve the signal-to-noise ratio of the results, we only keep the states with at least 100 samples in both sampling periods, so we end up with 17 states in the analysis[1]. We use three different estimation models. In the first model, only state and time fixed effects are used. In the second model, state-level average demographics (age, sex, median income) are added, and in the third one, country of birth controls (share of children born in Mexico, Central

America, Cuba, West Indies, and South America) are added. The estimated treatment effects are shown in Table 2. This table shows that the effect of *Plyler v. Doe* on school enrollment of undocumented children in Texas is positive and significant in all specifications, and the estimated effect ranges from 7.8% to 9.5%.

Table 2 about here

To assess robustness, we re-estimate the treatment effects after excluding states with immigrant populations that differ substantially from Texas. As shown in Appendix A, the results remain unchanged.

Treatment Effect Heterogeneity Analysis

To examine heterogeneous effects of *Plyler v. Doe* across student characteristics, we estimate the difference-in-differences specification introduced above, including only state and time fixed effects, separately for each subgroup. To reduce estimation noise, we restrict the sample to states with at least 20 students in the relevant subgroup for each analysis. Figure 4 presents the estimated treatment effects, β, for each group. The results indicate that the treatment effect is positive and statistically significant for most age groups, with the largest effect observed at age five, where enrollment increases by approximately 30 percent.

Figure 4 about here

We also study the heterogeneity of the treatment effect based on children's country of birth.

Since 62.23% of the sampled children are born in Mexico, we study the treatment effect heterogeneity among students born in Mexico vs. other countries. The estimated treatment effects are shown in figure 5. This figure shows that while the average treatment effect is larger than 10% and statistically significant among children born in Mexico, it is not statistically different from zero for those born in other countries. This could potentially be because children born in Mexico are more likely to be undocumented and therefore also more likely to be affected by *Plyler v. Doe*. Mexico remains the country of origin of most undocumented immigrants in the U.S. as of 2024 (Migration Policy Institute, 2024).

Figure 5 about here

Figure 6 shows that the treatment effect was relatively similar across male and female students in our sample. The nearly identical treatment effects across gender suggest that participation gains associated with the *Plyler* decision were not concentrated on one gender after and perhaps neither before the decision. However, we are not able to examine if there were any participation differences during the period when the tuition requirement was in effect and parents were placed in the position to decide which child to send to school at the new tuition rate. Although we did not directly test the role of gender, one interpretation from these results is that access constraints rather than gender-specific preferences, beliefs, or labor needs, drove school participation changes after the *Plyler decision.*

Figure 6 about here

Figure 7 depicts the treatment effect for children with income levels below and above the

sample median in each period. It shows that the treatment effect was larger for those with lower income levels. However, the difference is not statistically significant, potentially due to small sample size.

Figure 7 about here

The role of cost is critically important for low-income families regardless of citizenship status. Unsurprisingly, Figure 7 shows that treatment effects are larger among children from households with income below the sample median, although the difference between income groups in our sample of undocumented families is not statistically significant. Nonetheless, these results suggest that removing tuition and admission barriers were likely to have been incredibly consequential for families with larger financial constraints and other risks related to being that more financial support could not mediate. However, we interpret these results with caution as they are not statistically significant although signal that more research in this area would be of great benefit to understanding the role of financial stability even among families with uncertain citizenship statuses.

At the same time, because the difference across income groups is not statistically distinguishable, these results should be interpreted cautiously. The pattern may reflect limited sample size or variation in how families responded to policy changes across districts and time periods.

Discussion

This study examined the educational impact of the 1982 *Plyler v. Doe* decision on Hispanic

students likely to be undocumented in Texas, focusing on access to public K–12 schools. The case arose after a 1975 Texas statute denied undocumented children the right to attend public schools. Civil-rights attorneys from the Mexican American Legal Defense and Educational Fund represented sixteen parents seeking to restore their children's constitutional rights under the Fourteenth Amendment. After a lengthy legal battle, the U.S. Supreme Court, in a narrow 5–4 decision, ruled that the Amendment's protections extend to all persons within U.S. borders, regardless of citizenship. Writing for the majority, Justice Brennan warned that denying children an education would impose a lifetime of hardship, creating a permanent underclass of illiterate individuals brought to the country as children and burdened with a status of illegality for which they were not responsible (*Plyler v. Doe*, 1982).

Our analysis provides evidence that the decision translated into measurable participation changes in Texas public schools. We first established the viability of the relevant population as an eligible treatment group using ACS data. We then examined the share of Latino students across Texas school districts before and after the decision, identifying institutional and structural shifts consistent with increased participation. Finally, we measured individual-level changes by age and gender, confirming that gains were concentrated among students in cohorts most likely to benefit from the removal of tuition requirements and admissions barriers related to citizenship status. Taken together, these results provide suggestive evidence that the removal of legal and financial barriers contributed to increased participation of Latino foreign-born noncitizen students in Texas public schools following the decision.

Research on the later passage of the 1987 IRCA law indicates that individuals who benefited from federal amnesty—primarily undocumented immigrants rather than refugees or asylees—faced fewer barriers to employment and college attendance after legalization. Considered alongside our findings, it is plausible that the *Plyler* decision increased the number of undocumented Latino students able to enter, re-enter, or remain in school, eventually becoming eligible high school graduates and thus potential college enrollees by the time the IRCA legalization window opened. While we do not directly test whether *Plyler* cohorts later benefited from IRCA legalization, our analysis is consistent with a relationship between the 1982 decision and the increase in the share of Latino foreign-born noncitizen students in Texas public schools.

This study has two important limitations. First, undocumented status is not directly observed in the Census data, and the analysis relies on foreign-born non-citizen Hispanic children as a proxy group likely to include undocumented students; the results should therefore be interpreted as suggestive rather than definitive evidence of causal effects on undocumented children. Second, the policy variation occurs in a single treated state, which limits statistical power and complicates inference. Accordingly, the findings provide quasi-experimental evidence consistent with Plyler v. Doe expanding school participation in Texas, but should be interpreted with appropriate caution.

These findings carry important implications for ongoing policy debates about the return on investment of providing free public education regardless of citizenship status. The results

indicate that when access barriers to schooling are removed, educational participation among vulnerable student populations increases—supporting the Supreme Court's concern in *Plyler v. Doe* that excluding children from education would impose substantial long-term social and economic costs. Conversely, policies that increase uncertainty or reinstate barriers to access risk undermining these gains in participation and attainment, particularly for families navigating precarious legal conditions. Recent estimates of the benefits associated with *Plyler*, along with projections of the potential losses from its retrenchment, reinforce these conclusions. What can be established from the historical record is that undocumented students, on average, have taken advantage of the educational opportunities made available to them. The evidence further suggests that the benefits of providing this basic education substantially exceed its costs, and that when access has been restricted and later restored, families have consistently ensured their children's return to school.

Because Texas has long had—and continues to have—the second-largest Latino and immigrant population in the United States, changes in educational access within the state carry implications that extend well beyond its borders. Increased educational participation among this population affects family well-being, workforce preparation, and state economic development, with downstream consequences for the national economy. As debates over immigrant access to education persist, evidence from past legal interventions such as *Plyler* offers a critical benchmark for evaluating future policy decisions. Although contemporary immigration patterns may differ from those of the 1970s and 1980s, the role of education as a cornerstone of self-determination and economic and social mobility remains central to the

American project.

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[1] We use the term Hispanic and Latino interchangeably for the purposes of this analysis. As we note in this manuscript, the federal government has altered the identity of the "Hispanic" ethnic identity over time from "Spanish surname" to Hispanic while many school districts use Latino in their own publications.

[2] While previous years of the ACS data could be useful for studying parallel trend assumption for the difference-in-differences analysis, unfortunately, there is no previous sample which includes both school enrollment and citizenship status.

[3] These states are Arizona, California, Colorado, Connecticut, Florida, Illinois, Louisiana, Maryland, Massachusetts, Nevada, New Jersey, New York, Pennsylvania, Texas, Virginia, and Washington.

[4] Numerous studies use the foreign-born non-citizen (FBNC) classification as the best available proxy for individuals most likely to be undocumented, particularly when analyses focus on respondents of Latin American—and more specifically Mexican—origin (Flores, 2010; Kaushal, 2008; Potochnik, 2014). Van Hook and Ro (2021) reaffirm that many datasets estimating legal status, often through imputation methods, produce more accurate estimates for Latino populations than for Asian populations. They therefore caution against applying the same proxy measures to Asian-origin individuals that are used for Latino-origin respondents, given differences in reliability across groups.

Table 1: Covariate balance of Latino students likely to be undocumented by panel.

Panel A: Pre-treatment covariate levels (1980)

Variable	Other States	Texas	Norm. Diff.
Enrolled	0.876	0.772	-0.774
Age	13.074	12.416	-0.331
Female	0.478	0.467	-0.074
Family Size	4.662	6.331	1.315
Median Income	16.782	11.620	-0.838
Place of Birth:			
Mexico	0.347	0.911	1.590
Central America	0.148	0.018	-0.795
South America	0.247	0.021	-1.042
Cuba	0.055	0.010	-0.414
West Indies	0.030	0.001	-0.452
Other	0.043	0.024	-0.439

Panel B: Pre–post covariate changes (1980–1990)

Variable	Other States	Texas	Norm. Diff.
Enrolled	-0.056	0.058	0.528
Age	-0.408	0.328	0.290
Female	-0.053	0.010	0.246
Median Income	7.942	4.230	-0.358
Family Size	-0.024	-0.551	-0.440
Place of Birth:			
Mexico	0.095	-0.081	-0.910
Central America	0.033	0.090	0.288
South America	-0.063	0.003	0.331
Cuba	-0.043	-0.009	0.420
West Indies	0.019	0.000	-0.203
Other	0.008	0.007	-0.006

Notes: Panel A reports covariate means in the pre-treatment period (1980). Panel B reports pre–post changes (1990 minus 1980). Sample restricted to foreign-born non-citizen Hispanics. Only states with at least 100 observations in both 1980 and 1990 samples are included. Normalized differences are computed as *(Mean_Texas - Mean_Other) / SD_Other*, as the treatment group consists of a single state. This table is descriptive and does not constitute a formal test of the difference-in-differences identifying assumptions. Median income is measured in thousands of U.S. dollars.; *Source:* American Community Survey.

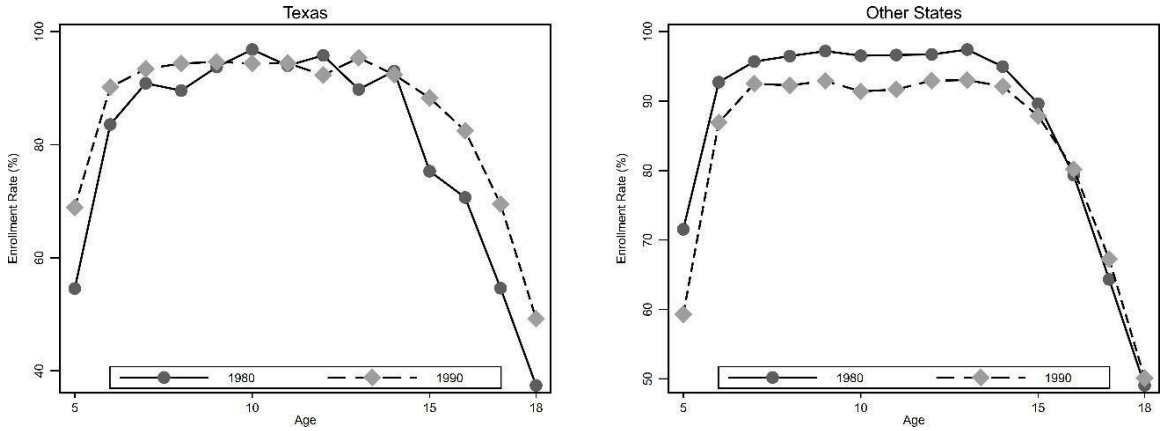
Table 2: The effect of *Plyler v. Doe* on the school enrollment of undocumented Latino students in Texas:
Treatment effect estimates using
difference-in-differences[3]

VARIABLES	(1) Model 1	(2) Model 2	(3) Model 3
Treatment Effect	0.0949***	0.0829***	0.0778***
	(0.0165)	(0.00988)	(0.0171)
Observations	34	34	34
State FE	YES	YES	YES
Demographics Control	NO	YES	YES
Birthplace Control	NO	NO	YES

Robust standard errors in parentheses
*** p<0.01, ** p<0.05, * p<0.1

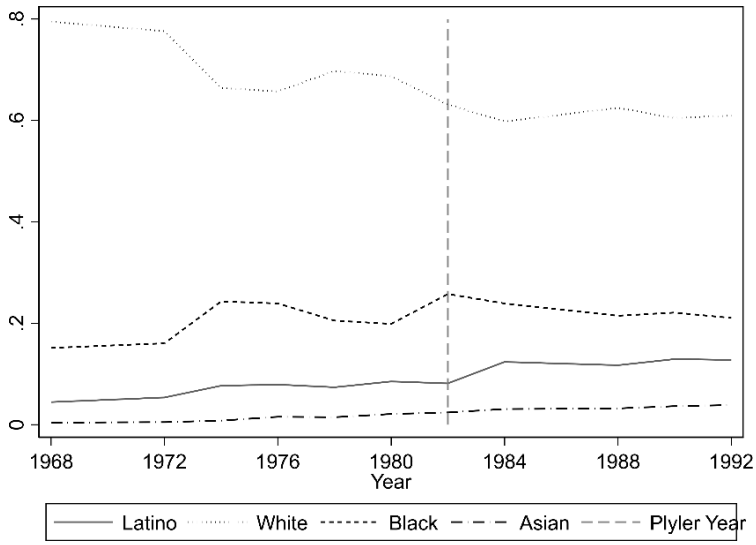
Source: American Community Survey

Figure 1: Average enrollment of foreign-born non-citizen Latinos by age in 1980 for Texas (left); other states (right).



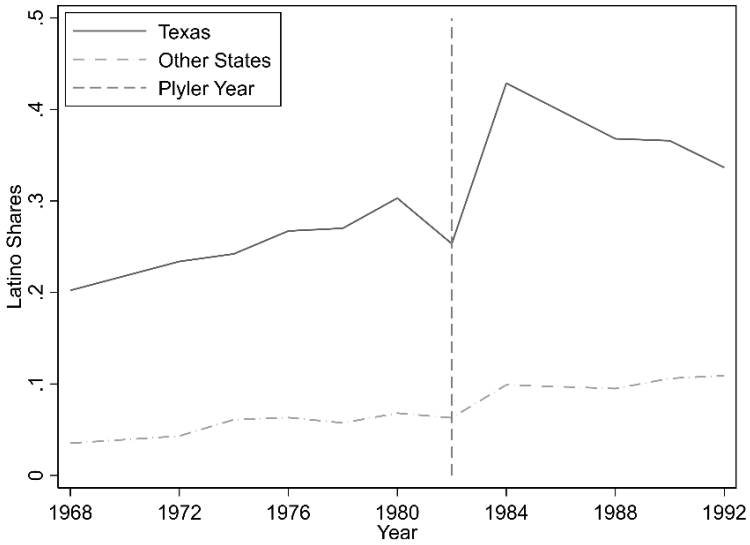
Source: American Community Survey.

Figure 2: Shares of different racial groups among K-12 students in the United States from 1968 to 1992.



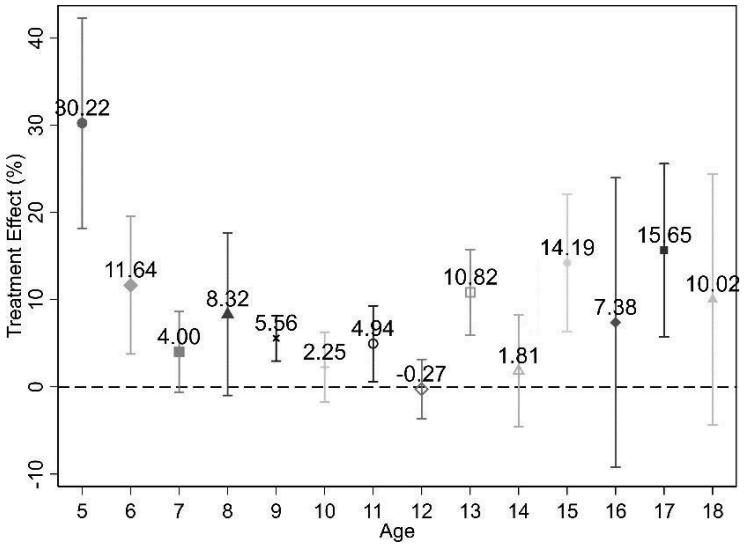
Source: Civil Rights Data Collection.

Figure 3: Share of Latino students in Texas and in other states from 1968 to 1992



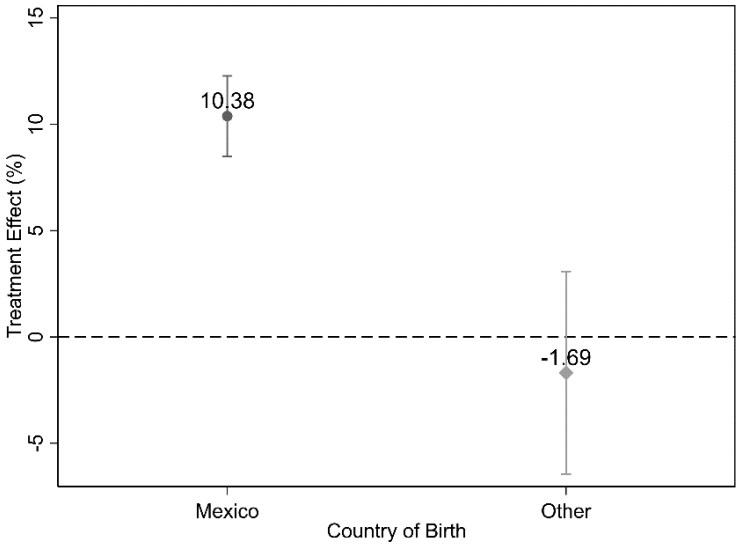
Source: Civil Rights Data Collection.

Figure 4: Treatment effect size by age



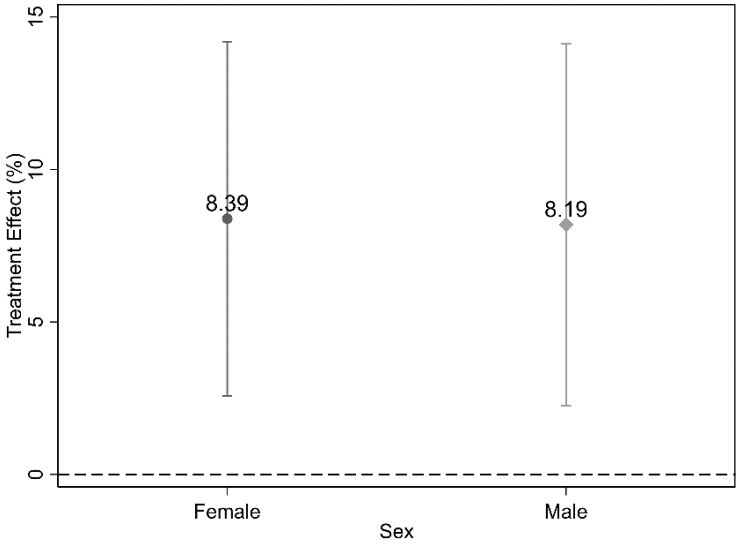
Source: American Community Survey.

Figure 5: Treatment effect size by country of birth



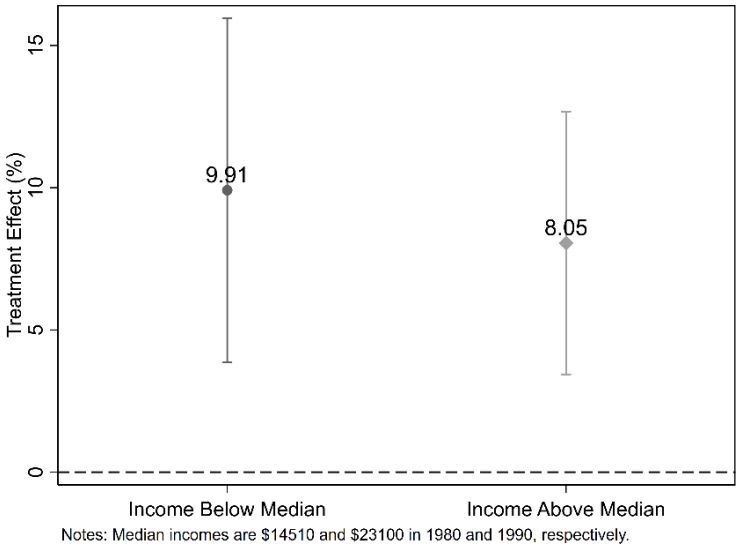
Source: American Community Survey.

Figure 6: Treatment effect size by sex.



Source: American Community Survey.

Figure 7: Treatment effect size by level of income



Source: American Community Survey.

APPENDIX A

The effect of *Plyler v. Doe* on the school enrollment of undocumented Latino students in Texas as compared with control group excluding non-traditional way immigration states of LA, MA, and VA:

Treatment effect estimates using difference-in-differences

VARIABLES	(1) Model 1	(2) Model 2	(3) Model 3
Treatment Effect	0.0948*** (0.0178)	0.0857*** (0.0130)	0.0900*** (0.0180)
Observations	28	28	28
State FE	YES	YES	YES
Demographics Control	NO	YES	YES
Birthplace Control	NO	NO	YES

Robust standard errors in parentheses

*** p<0.01, ** p<0.05, * p<0.1

We find similar results when excluding non-traditional gateway immigration states of Louisiana, Massachusetts, Virginia: results are even larger.