

**School Counselors Working With Undocumented**

**Students in K-12 School Settings**

Anjanette Todd, Crystal Ayala, and Karen Barraza

University of Texas at El Paso

### **Abstract**

Undocumented students face many challenges while trying to navigate through the K-12 educational system. This article emphasizes the educational and personal challenges and traumas this vulnerable student population faces. Using the ecological systems theory (1977) developed by Urie Bronfenbrenner as a framework, two student vignettes will be presented. Both vignettes will provide information on laws and policies that apply to undocumented students as well as highlight counseling interventions to address the stress and trauma that impact their mental health.

*Keywords:* school counselors, undocumented students, immigrant youth, trauma, counseling

## **School Counselors Working With Undocumented Students in K-12 School Settings**

On November 8, 2016, the future of undocumented immigrant students in the United States became uncertain due to the number of immigration policies the U.S. government enacted. These anti-immigrant policies included the rescinded status of Deferred Action for Childhood Arrivals (DACA), mass deportations, limited access to asylum seekers, and family separation at the U.S. border (Pierce, Bolter, & Selee, 2018). According to a report by the Civil Rights Project at the University of California, Los Angeles, fear has permeated undocumented students' school experience and this vulnerable population are isolating themselves at an increasing rate (Gándara & Ee, 2018). School counselors must be provided with information about how this hostile rhetoric is impacting students within schools so that they are better able to advocate for these students and provide the necessary academic, behavioral, and social/emotional supports to students within these communities.

At the time of this publication, there are 10.5 million undocumented immigrants residing in the U.S.; of that number, there is an estimated 3.9 million K-12 students whose parents are undocumented, and approximately 1.3 % of them are undocumented themselves (Passel & Cohn, 2016, 2019). Undocumented students are a vulnerable group as they often attempt to remain undetectable in schools because of the fear that they have for themselves and their families being deported (Abrego, 2006; Gonzales, Suarez-Orozco, & Dedios-Sanguinetti, 2013). It is also widely accepted that their development is affected by multiple and complex factors, including those in their distal context (e.g., laws, institutions, policies) (Brabeck & Xu, 2010). In addition,

undocumented students may have experienced trauma in their home country and/or during their migration to the U.S. (Becker Herbst et al., 2018; Falcon, 2001).

Furthermore, in the U.S., all children have the right to a free and public education (Plyler vs. Doe, 1982) regardless of their immigrant status or their parents/guardians' status, but many undocumented students and their families remain unaware of this right. These students need an advocate who can help provide the support and counseling required to address their specific needs within the school environment. School counselors address the academic, social/emotional, and career needs of all students through the integration of counseling services that foster access and pathways for academic success (American School Counselor Association [ASCA], 2016) and can be a vital support for undocumented students.

### **Impact of Immigration Status on Undocumented Students**

Although the literature is sparse regarding how school counselors can support undocumented students in K-12 school settings, two articles incorporate the role of the school counselor when discussing undocumented immigrant children. For example, using a case study format, Chen, Budiarto and Wong (2010) provided strategies for school counselors using group work to advocate for undocumented students. More recently, Crawford, Aguayo, and Valle (2017) conducted a qualitative study exploring how school counselors advocate for immigrant students and what motivates counselors to advocate for educational access. Crawford et al. interviewed seven school counselors and a family intervention specialist, and the following themes emerged: sense marginalization, confronting discrimination and supporting survival activities, securing access to relationships, resources, and confidences. Studies have also been

conducted that examine the impact and challenges of immigration status on undocumented students. For instance, Brabeck and Xu (2010) investigated the impact that deportation and detention have on children's emotional well-being and academic performance. Brabeck and Xu (2010) developed a survey that was translated into Spanish, which was based on the participatory action research (PAR) project of the Post-Deportation Human Rights Project (PDHRP). A total of 132 participants completed the survey with 38% self-identified as undocumented. The majority of the participants (73.5%) had a child born in the U.S. and 41.7% had a child born outside the U.S. The survey included questions to measure parental legal vulnerability, the impact of deportation on family environment, and the impact of deportation on child well-being. Survey results indicated that deportation policies and practices, along with the looming threat of deportation, had negative social, emotional, economic, and academic impacts for undocumented Latino children and parents (Brabeck and Xu, 2010). Similarly, the threat of deportation may also impact undocumented students' decisions to disclose their legal status at school. In a related study, Figueroa (2017) interviewed fifth-grade undocumented students and explored ways in which these students decided to share or withhold their status. Results revealed that legal status impacted the ways in which students engaged and contributed within their educational settings. The students who had obtained resident status were open and willing to share their border-crossing stories with classmates; whereas the student who had undocumented status avoided participating in classroom activities, especially in the social-emotional lessons that focused on identity exploration.

## **Reasons for Migration and Challenges for Undocumented Students**

There are many reasons people may choose to leave their home countries and come to the United States. Some choose to cross the border in search of employment (Guarnaccia, Martinez, & Acosta, 2005), or in hopes of greater educational and economic realization in the United States. Others choose to leave in order to escape the escalating drug-related crimes and violence that have permeated their country of origin (Calderon, Ferreira, & Shirk, 2018). During migration, these individuals may also encounter violence that can leave long-lasting trauma. It has been reported that approximately sixty percent of women and girls are sexually assaulted on their way to the U.S. (Falcon, 2001). Being a victim of, or a witness to, violence can create lasting trauma to those exposed to these events, especially children who are still developing socially, emotionally, and cognitively. A study conducted by the United Nations High Commissioner for Refugees (UNHCR, 2014) provided a glimpse into the prevalence of violence that children in Mexico were experiencing. Researchers interviewed 400 children with approximately a quarter of the sample represented by children from Mexico. Of the children interviewed from Mexico, 32% reported violence within their community, 17% reported experiencing violence at home, and 12% spoke of experiencing both (UNHCR, 2014). Children who have experienced violence, may show signs of anxiety, depression, or post-traumatic stress disorder (PTSD) (Thabet, Abed, & Vostanis, 2004). When these mental health issues are combined with the fear of deportation, the trauma experienced by undocumented individuals may be further compounded. Ultimately, the exposure to such traumatic events can lead to further

challenges for these students and families who are seeking to create a life and obtain an education in the United States.

In 2017, approximately 226,000 undocumented immigrants were deported from the U.S. (Migration Policy Institute. U.S. Immigration and Customs Enforcement, 2017). The threat of deportation causes worry and anxiety for children who are undocumented and keeps many students living in the shadows (Nguyen & Kebede, 2017). Although legislation (Plyler vs. Doe, 1982) provided the legal standing for undocumented immigrant students to have equal access to a free public education, these students continue to feel stigmatized in their schools and communities (Abrego, 2011). Undocumented students miss many of those developmental milestones or *rites of passage* that their US born peers have access to, such as applying to their first part-time job, obtaining a driver's license, or being eligible for financial aid for college (Gonzales et al., 2013; Lopez, Taylor, Funk, & Gonzalez-Barrera, 2013). Many of these children and their families will struggle due to factors such as low socioeconomic status (Batalova & McHugh, 2010), stigma associated with being undocumented (Abrego, 2011), educational and language barriers, an inability to understand the U.S. educational system (Lad & Braganza, 2013), and limited access to federal funding and services (Batalova & McHugh, 2010). As a result, only approximately 65,000 undocumented students graduate each year from U.S. high schools (Gonzales, 2009). Consequently, a need exists within our society to place more focus on these students given that having an undocumented status can impact children greatly by constricting pathways and educational access as they transition through childhood, adolescence, and beyond (Gonzales et al., 2013).

Therefore, the purpose of this article is to emphasize the educational and personal challenges this vulnerable student population faces and to provide relevant information for school counselors to support their success in a K-12 educational setting. The following areas will be discussed: (a) undocumented students' right to public education, (b) the current political climate, (c) Bronfenbrenner's ecological systems theory, and (d) counseling interventions. Finally, two case vignettes integrating some common experiences of undocumented students at the primary and secondary levels will be presented and implications will be discussed.

### **Undocumented Students' Right to Public Education**

The U.S. Supreme Court case, *Plyler v. Doe* (1982), ensures that all children in the United States have the right to free and public education regardless of their immigrant status or their parents'/guardians' status. However, undocumented children and their parents/guardians may not be aware of these laws and as a result could face a number of challenges when enrolling in a public school. For example, schools may ask parents to provide proof of residency in their district (e.g., driver's license, utility bill, parent affidavit, rent payment receipts, or mortgage document) in order to enroll their child. Currently thirty-eight states in the U.S. do not allow an undocumented immigrant to obtain a driver's license or a driving permit. Therefore, it is important that parents are made aware that schools cannot require parents/guardians to present a driver's license or a state issued identification. In addition, many immigrant parents do not have a credit history and therefore do not qualify to buy/rent a house or an apartment (Intercultural Development Research Association [IDRA], 2019). Furthermore, schools cannot legally require parents/guardians to provide custody papers (IDRA, 2019) and schools cannot

deny parents/guardians from enrolling their children because they lack proof of custody. Although school districts may ask for a student's social security number, school officials need to inform parents/guardians that providing their child's social security number is voluntary and not providing it will not affect the child's enrollment. They cannot require a parent/guardian to provide their social security number to enroll their child. School districts may ask for a copy of the student's birth certificate or passport to verify their age and to place them in the appropriate grade level. Undocumented parents/guardians may be reluctant to provide their child's birth certificate because they may see it as a way to alert the school that the student is not a U.S. citizen. However, schools cannot prevent students from enrolling if they present a foreign birth certificate or passport. In addition, the Family Education Right and Privacy Act (FERPA) protects families by restricting schools from sharing information on immigration status to immigration agents and this also applies to the college/university settings that receive federal funds (Edwards, 2018).

The McKinney Vento Act is a law that has implications for undocumented students. Families who have immigrated to the United States have been found to struggle socioeconomically and as such may experience poverty and homelessness (National Center for Homeless Education, 2017). It is possible that undocumented students may meet the definition of homelessness based on their housing situation; such as a family where one parent has been deported and may need to move in with another family for financial reasons. Under this act, the child(ren) can stay in their current school with transportation and be eligible for additional supports based on their needs under this law. Special Immigrant Juvenile Status (SIJS) is another immigration

law that provides some youths with a pathway towards legal status if certain criteria are met (Junck, 2012). Undocumented immigrants under the age of 21, who have suffered abuse, abandonment or neglect by one or both parents, and if it is not in their best interest to return to their country of origin, have previously been able to apply for SIJS (Junck, 2012).

### **Current Political Climate**

At the time of this publication, the sociopolitical climate of uncertainty that surrounds immigration rules makes immigration-related topics especially relevant for school counselors since counselors are advocates for students and need to stay abreast of the most current laws and strategies for best practices when working with undocumented students. On September 5, 2017, the U.S. government ended the 2012 Deferred Action of Childhood Arrivals (DACA) program and the U.S. Department of Homeland Security stopped accepting first-time DACA applications. The original intent of DACA was to help eligible immigrant youth obtain a social security card, work authorization, and allow those enrolled in DACA a reprieve from deportation (Lindsey, 2014). Currently, the future of the approximately 800,000 participants enrolled in the DACA program is in jeopardy. On April 24, 2018, the U.S. District Court reversed the closing of the DACA program due to incomplete justification as to the reasons for its termination (National Immigration Law Center [NILC], 2018). On November 12, 2020, the Supreme Court will hear oral arguments regarding the current administration's decision to terminate DACA (NILC, 2018).

Another immigration policy impacting immigrant youth was enacted on April 2018 (Chishti & Bolter, 2018). This was a "zero tolerance" U.S. border policy that was upheld

in which children were separated from their parents at the border (Chishti & Bolter, 2018). The zero-tolerance policy ended in June 2018; however, more than 3,000 children were forcibly separated. Consequently, many children may continue to suffer the effects of this trauma.

### **Ecological Systems Theory**

The ecological systems theory developed by Urie Bronfenbrenner (1977) could provide a helpful lens to better understand how environmental context and personal characteristics intersect in the lives of undocumented students as they navigate the K-12 school environment. This framework provides a means to understand how the inclusion of complex contextual factors such as culture, family, values, documentation concerns, fears, and trauma, are part (either directly and/or indirectly) of an undocumented student's school experience. Ecological systems theory is made up of five environmental systems that are nested within a layered concentric model, with the core being the student. The systems are microsystem, mesosystem, exosystem, macrosystem, and chronosystem (Bronfenbrenner, 1977). The microsystem level is where undocumented students would have the most immediate interaction with their environment. Such as, family, friends, peer group, counselors, and teachers. The mesosystem supports and facilitates communication between all of the different microsystems. An example can be when an undocumented student talks with a school counselor about their immigration status. The exosystem is more removed from an undocumented student's immediate environment; however, it still has the potential to impact their development. A mother and/or father who is in constant fear of deportation may transfer this stress onto the child within the home environment. The macrosystem

is the largest system and is comprised of values, beliefs, resources, culture, customs, and laws (Bronfenbrenner, 1989). The uncertain political climate surrounding immigration laws is an ongoing concern that affects the decisions parent(s) are making which concern their life circumstances. The chronosystem encompasses how the dimension of time impacts an undocumented child's development. For example, consider the case of undocumented students entering high school and seeing how other students are able to access opportunities such as obtaining driver's licenses and/or getting part-time jobs. Feelings of anger, confusion, and hopelessness regarding their immigration status may arise which may then influence their development over time.

### **Counseling Interventions**

There are several counseling interventions that currently exist to provide assistance to children and adolescents with some form of trauma, or who fall under the category of undocumented or immigrant individuals. Trauma systems therapy (TST) and trauma systems therapy for refugees (TST-R), focus on the child's social environment, their history of trauma, and their abilities to self-regulate their emotions and address the specific needs of this population through the incorporation of community-based services, culturally competent services, and the integration of evidence-based practice (Benson, Abdi, & Ford-Paz, 2017). Another intervention is trauma-focused cognitive behavioral therapy (TF-CBT), which has its roots in cognitive processing therapy, was adapted to focus on children with trauma (Cohen, Mannarino, Berliner, Deblinger, 2000). The focus of this article is on cognitive behavioral intervention for trauma in schools (CBTIS; Jaycox, Langley, & Hoover, 2018).

Cognitive behavioral intervention for trauma in schools (CBITS; Jaycox et al., 2018) is derived from trauma-focused cognitive behavioral therapy (TF-CBT) and was developed to address the mental health needs and concerns of multi-ethnic youth who have been or are currently exposed to stressful, traumatic, and violent events. A study conducted by Allison and Ferreira (2016) with Spanish speaking Latino youth utilizing CBITS, found that this intervention significantly decreased their symptoms of trauma and depression. CBITS focuses on individuals from 9-18 years old; the treatment consists of ten group sessions that last between 50-60 minutes each, and with one to three individual sessions, as well as one or two psychoeducation sessions for the parents/guardians and teachers of the students (Allison & Ferreira, 2016). This evidence-based intervention seeks to incorporate psychoeducation, relaxation techniques, cognitive therapy, trauma exposure, and social problem solving to aid in the child's trauma and depression symptomology (Santiago, Lennon, Fuller, Brewer, & Kataoka, 2014).

There have been limited studies that have explored the impact of immigration status on undocumented students (Brabeck & Xu, 2010; Figueroa, 2017) and only two previous studies included the role that school counselors have when examining challenges related to undocumented students in school settings (Chen et al., 2010; Crawford et al., 2017). Based on these factors, there is a need for school counselors to cultivate the necessary skills to address the specific challenges that undocumented students face as they navigate through their K-12 educational experience. This article captures common experiences undocumented students face using case vignettes. A vignette for an elementary and a high school student will be presented. Using ecological

systems theory as a framework, each vignette will include traumatic stressors that impact the mental health of undocumented students that lead to PTSD, anxiety, and/or depression. The case vignettes will offer counseling interventions that may assist school counselors in providing mental health services to K-12 undocumented students.

Furthermore, an additional goal is to highlight the current laws and strategies for school counselors working with undocumented students. The vignettes include applicable laws and policies that protect the educational rights of undocumented students and provide resources for school counselors to advocate for undocumented students.

### **Case Vignette: Elementary School**

Carlos is an eleven-year-old student in the fifth grade. He crossed the border with his family and entered the United States from Mexico one year prior. Carlos and his family fled Mexico to escape the increasing violence and instability in his home country. Upon crossing the border, Carlos was separated from his family as a consequence of the zero-tolerance immigration policy enforced during this time. It took approximately two months before Carlos was finally reunited with his parents. Carlos and his parents then moved into a home with a family already living in the United States and he was enrolled in a local public school. Over the past year, Carlos has significantly improved in his English and feels comfortable speaking at school; however, his teacher referred him to the school counselor because he has trouble focusing on assignments and keeps falling asleep during class. During the first meeting with the counselor, Carlos seemed anxious and on the verge of tears. To help Carlos feel safe, the counselor discussed confidentiality, and the limits of confidentiality, in order to create an accepting environment where Carlos felt safe and had the space to open up about his feelings and

fears. Carlos then disclosed that his parents told him to avoid speaking to school personnel other than his teacher because of his immigration status and shared his story with her. Carlos reported he had experienced anxiety and extreme worry that he and his parents may possibly be deported. Carlos disclosed the reason why they moved to the U.S. and stated that he has trouble falling sleep at night. He also mentioned that he has intrusive memories of a burglary that he and his family experienced while living in Mexico and the memory that is most present is seeing his father with a gun pointed at his head. As a result of these experiences, Carlos does not have many close friends because he fears that he will disclose his immigration status. When asked where he was born, he always tells his classmates that he lived in Mexico but was born in the U.S.

### **Counseling Considerations for Carlos**

Using ecological systems theory as a framework, Carlos' feelings of isolation surrounding his immigration status demonstrated the influence his microsystem (groups in close contact) may have on his environment. In order to address this area, the school counselor may invite Carlos to participate in a small group designed to help students who may be experiencing similar feelings and fears of deportation and/or immigration concerns. Broadening the sphere of Carlos' microsystem may be helpful as it may aid in easing feelings of isolation. Another area of concern that is affecting Carlos, as observed through his descriptions of flashbacks and nightmares, is the unresolved trauma surrounding the burglary and violence against his family. Incorporating a more specific group treatment intervention such as CBITS may be helpful in order for Carlos to process the trauma he has experienced. This trauma-informed treatment protocol

consists of group sessions, as well as psychoeducational sessions, for both parents/caregivers and teachers (Santiago et al., 2014). Utilizing CBITS, the school counselor could integrate a relaxation technique such as a peaceful visualization exercise asking Carlos to visualize a peaceful or happy place/atmosphere where he felt safe. As a therapeutic relationship is built, the counselor could ask Carlos to discuss his trauma narrative, while encouraging him to integrate the positive coping/relaxation techniques he is learning, in order to process and better manage his feelings of anxiety surrounding the trauma. It is also important to highlight that not all students may be open to participating in group counseling. For this reason, school counselors can work to adapt this CBITS intervention and expand on the individual sessions. It is also important to highlight some of the challenges found when using small groups in this capacity (i.e., identification of students, reluctance of students to disclose status, lack of understanding in the purpose of the group), as well as some of the benefits (i.e., builds feelings of hopefulness and a sense of belonging, fosters resilience) (Chen et al., 2010).

Carlos' anxiety surrounding his immigration status is further compounded by the struggle he has between his promise to his parents of not disclosing his status, and his need to talk to someone without fear of negative consequences for him or his family. With respect to the mesosystem (factors that help facilitate communication between systems), the counselor serves an important role helping to process the transaction between the microsystem and the macrosystem (i.e., between his promise to his parents [microsystem] and his legal rights [macrosystem]). A school counselor can help Carlos to understand that the counselor is a safe adult within the school with whom he can confide. For example, a school counselor might: (a) help Carlos fully understand the

role of confidentiality within the counseling relationship (ASCA, 2016); (b) make him aware that it is not legally allowed for anyone employed within the school district to ask him about his immigration status (U.S. Department of Education, 2015); and (c) reinforce that public schools are designated “sensitive zones” which means that immigration enforcement actions, such as deportations, are generally avoided in school settings (U.S. Department of Education, 2014).

Carlos’ fears surrounding deportation demonstrate how his exosystem (factors outside of his direct control that impact his mental health) influences his social-emotional development. For example, undocumented students often do not want to reveal their undocumented immigrant status fearing that they, or their families, may be deported to their country of origin (Abrego, 2011; Gonzales et al., 2013). Their fear may also be compounded by parents/guardians telling their young children to avoid speaking to school staff members, in order to keep their status a secret. This demonstrates how aspects of a child’s exosystem can negatively impact their mental health and may result in feelings of isolation and anxiety at school. Counselors can play an integral role in addressing these feelings of isolation and anxiety by creating a welcoming and inclusive environment where students, such as Carlos, can feel safe to express their concerns. Research has shown the positive impact that a caring bond from an educator can have on an undocumented student’s current and future success (Enriquez, 2011). Thus, a counselor can work to build a strong, trusting, and caring relationship with Carlos, as this nurturing bond may help to ease some of the worries that are out of his immediate sense of control. When students are in a trusting and supportive environment where they feel they can share the struggles and difficulties that are inherent in living with this

undocumented status in the United States, they are more likely to stay in school and feel less emotional distress (Gonzales et al., 2013).

At a macrosystem level (cultural/legal aspects), the school counselor can inform Carlos and his parents of their legal rights which include Plyler v. Doe and FERPA, as this may help ease some of the fear and anxiety that their family is experiencing. School counselors can also advocate for the student and the family by providing information regarding resources within the community that may be helpful to undocumented families (i.e., resources to find out about pro bono legal aid, flyers provided in the primary language spoken at home on educational rights for all students in regard to immigration law). Additionally, different cultures may have perceptions that mental health services are stigmatizing (Leong & Lau, 2001); therefore, counseling interventions such as CBITS could be expanded to incorporate parent engagement in treatment in order to demystify the counseling process and reduce the stigma surrounding these services.

Moving to a different country is an example of a change in Carlos' chronosystem (environmental events and transitions), which can be stressful for children or adolescents who typically migrate to the U.S. because of their parent(s) decision (Perreira et al., 2006). Many immigrant children who were brought to the U.S. have no recollection of living in their country of origin and some may not even be able to communicate in their native language (Gonzales et al., 2013). Carlos is able to communicate in both English and Spanish; however, it is important for counselors to be aware that some immigrant children may not be fluent in English or may not speak English at all. Families immigrating from South America and Mexico speak indigenous languages such as Q'anjob'al, K'iche', Quechua, Guarani, and Aymara. In 2018, two

children who spoke indigenous languages, died while under the custody of Border Patrol (Perez, 2018). This underscores the importance of understanding the student's worldview, being culturally sensitive and integrating appropriate skills and interventions to help all students. As such, school counselors can reach out to students who speak a foreign language in order to help support a caring and welcoming environment. School counselors can also connect with the school board in order to request a translator be available in order to be culturally sensitive to the language preference needs of students and parents/caregivers. The Multicultural and Social Justice Counseling Competencies (MSJCC) outline several key areas that guide culturally competent counseling, such as in the development of the attitudes and beliefs, knowledge, skills, and action competencies that aid counselors in effectively working with individuals from a multicultural and social justice framework (Ratts, Singh, Nassar-McMillan, Butler, & McCullough, 2016).

### **Case Vignette: High School**

Gabriela is a seventeen-year-old in her junior year of high school, is in the top 10% of her class, and is involved in extracurricular activities. Gabriela immigrated to the U.S. with her mother and brother when she was eleven years old. Gabriela's father stayed in Mexico to continue working; however, due to the escalating violence in her community, he was the victim of a robbery and was murdered when Gabriela was thirteen years old. Gabriela received DACA when she was sixteen years old. Since then the current administration announced the end of DACA. Gabriela's brother is attending the local university because the state offers in-state tuition to undocumented students. The local university does not offer the major that Gabriela wants to pursue and there are

a limited number of states that offer in-state tuition to undocumented students. Gabriela is feeling distressed and overwhelmed. Additionally, Gabriela recently overheard her mother saying she was worried about their finances and they may need to move in with an extended relative to help pay the bills. Gabriela is wondering if this means she may need to switch schools. All of these factors have contributed to Gabriela's feeling of stress and anxiety and she can barely sleep and has lost her appetite. Gabriela had a panic attack during class, and she was then taken to the school counselor. Gabriela reported that she "feels hopeless about her future" and that she can't help but think that all her hard work won't pay off because her future education will not be decided by her.

### **Counseling Considerations for Gabriela**

Gabriela's world has been impacted as she has experienced grief and trauma from losing her father. Using ecological systems theory as a reference, the school counselor could invite Gabriela to participate in a small group using a trauma-informed intervention such as CBITS. This intervention is designed to help students who have been, or are currently, exposed to stressful, traumatic, and/or violent events. With respect to Gabriela's microsystem (groups in close contact), the school counselor could work with Gabriela in a small group setting in order to help process the trauma that she experienced. Some examples of sessions within this CBITS treatment protocol include problem-solving skills, coping-skills, reframing of negative cognitions, and relaxation techniques (Jaycox et al., 2018). As a result of working with the school counselor in this capacity, Gabriela's microsystem may broaden and she may move towards a new understanding of the event and/or trauma which could then provide her with a greater sense of ease over her current situation (Jaycox et al., 2018).

Concerning the mesosystem (factors facilitating communication), the school counselor can play an instrumental role in teaching the faculty/staff about immigration laws that impact the student community through school-wide trainings, as well hold similar informational nights (sensitive not to identify specific families) for all parents in the community.

Although Gabriela's mother is not specifically talking with her about their financial situation, the mother's worry, along with the possible school change, may be compounding Gabriela's own feelings of stress. The school counselor can assess Gabriela's exosystem (external factors that impact her well-being) by talking with her about her home situation and providing information for the mother on the McKinney-Vento Homeless Assistance Act (2002). If Gabriela's family must move in with another family, Gabriela may meet the definition of homelessness and be eligible for the supports provided under this act. For example, Gabriela could be provided with transportation so she could continue to attend her current school in order to promote a sense of stability and this may also then ease some of her and her mother's stress. When a school counselor provides informational resources, such as the McKinney Vento Act, it is important to provide it in the families' primary language spoken at home to ensure the information is fully understood.

With respect to Gabriela's macrosystem (cultural/legal aspects), a factor that is negatively impacting Gabriela's mental health is the ending of the DACA program. As a result, Gabriela has expressed increasing feelings of uncertainty and anxiety regarding her future. As in Gabriela's case, the mental health of undocumented students can be affected due to feelings of despair over their undocumented status. Anxiety and

depression are among the most prevalent conditions Latino undocumented students experience (Potochnick & Perreira, 2011). After the inception of DACA, 40% of undocumented students who were eligible for DACA reported that their mental health quality improved (Patler & Laster Pirtle, 2018). However, rescinding DACA may exacerbate symptoms of anxiety, despair, and hopelessness among undocumented students due to not knowing what the future may bring. As DACA recipients, such as Gabriela, wait for the final Supreme Court ruling in 2020, it is more important than ever for school counselors to take time to build rapport and trust with these impacted students in order to provide emotional support and resources.

With respect to the chronosystem (environmental events and transitions), Gabriela believes her friends will be able to attend their preferred college and pursue majors of their choice when they finish high school; however, due to her undocumented status, she believes these same milestones will be restricted for her. As a result, Gabriela has reported feelings of hopelessness about her future. Gabriela's experience is not an isolated one, as undocumented students have expressed similar concerns regarding limited opportunities as a result of their undocumented status (Gonzales et al., 2013). Furthermore, since undocumented students are unable to receive federal financial aid, other concerns arise surrounding paying for college. Thus, some students may assume attending college may not be an option for them, or as in Gabriela's case, transitioning to a community college may be the only option. School counselors can address some of these concerns by providing students with various private scholarship opportunities/resources which may not require the stipulation of legal status. More specifically, the school counselor can provide Gabriela with information pertaining to

states that offer in-state tuition for undocumented students. For example, currently nineteen states allow in-state tuition rates for undocumented students (National Conference of State Legislatures, 2019). By providing resources such as these, counselors create opportunities for students to increase their range of available options, which in turn, may increase their hopefulness about their future.

### **Implications for School Counselors**

This article highlights some of the challenges that undocumented youth experience and demonstrates how school counselors are in the unique position to support these students in the K-12 school environment. The sociopolitical climate and current events in the United States underscore the need to address these issues now more than ever. Ecological systems theory (Bronfenbrenner, 1977) provides a holistic lens to better understand the experiences of undocumented students in schools. The five nested sub-systems (microsystem, mesosystem, exosystem, macrosystem, and chronosystem) helps to describe how a school counselor may impact an undocumented student's school experience either directly or indirectly. For example, at the microsystem level, counselors may provide opportunities for undocumented students to participate in small group counseling (related to an area of need). This can help students to broaden their peer group while also helping to ease some of the feelings of isolation at school. At the mesosystem level, counselors may facilitate the interaction between two or more of the sub-systems (such as the microsystem and the exosystem) that impact the undocumented student's lived experience. For example, the counselor could work with the school district/school leadership to establish a safe environment "sensitive zone" where a student's family members (microsystem) may be invited to

participate in their child's campus events. At the same time, counselors may organize parent night workshops (exosystem) in order to support the family/school connection. Some sample topics for workshops that support the child's exosystem may include updates on immigration policies/laws, psychoeducation on depression, anxiety, and PTSD, and family preparedness plans (for emergencies such as ICE raids). A family preparedness plan is a plan that is in place if a parent/guardian is not able to care for a child due to ICE deportation/detainment. The Immigrant Legal Resource Center (2014) web site provides family preparedness plans (in English and Spanish) that may be useful to school counselors. The macrosystem consists of cultural and legal factors that impact an undocumented student's life. For example, school counselors can work to establish trusting and confidential relationships with students who are awaiting the final Supreme Court decision regarding the DACA program's future. Regardless of the ruling, school counselors should be prepared to provide counseling and resources to support the students' social and emotional lives as they navigate through this difficult time of uncertainty. The chronosystem focuses on events and transitions that may be withheld/postponed due to the undocumented status of the student. An example could include the inability to receive federal financial aid for college. At this level, the school counselor could provide students with specific educational/legal resources such as scholarships for undocumented students and advising students to take Advanced Placement (AP) courses in high school to lessen the cost of college. Furthermore, school counselors may link students with legal aid, such as the Mexican American Legal Defense and Educational Fund (MALDEF) and the NILC (Long, 2020), in order to increase awareness and provide options for their future.

## **Suggestions for Future Research**

The future of undocumented K-12 students remains uncertain. Future research may include case studies with undocumented elementary, middle, and high school students and their mental health. In addition, the ramifications of immigrant children separated from their parents at the border may be another area of further exploration. Undocumented students have been hearing constant threats of deportation, derogatory comments about immigrants, and new anti-immigration policies that have been enacted. Undocumented students have been made to feel that they do not belong in the U.S. and that no one is on their side. Therefore, school counselors are needed to be advocates and allies for undocumented students who are in a vulnerable position.

## **Summary**

While undocumented students in the United States anxiously await comprehensive immigration legislation reform that will provide a pathway to legal status, many young people continue to live in fear of being deported. Two case vignettes were presented to provide school counselors with depictions of realistic situations that undocumented students may encounter. Laws and policies were addressed that could impact immigrant youth. The constant state of flux of immigration policies highlight the importance for school counselors to keep abreast of immigrations laws while also advocating for undocumented students' rights. Ecological systems theory, which highlights both individual backgrounds and environmental influences, is used to help school counselors conceptualize the students' experience from a systemic perspective. As described in the case vignettes, CBITS has been shown to be an effective form of treatment when working with immigrant youth (Jaycox et al., 2018) and may be one way

for school counselors to address the mental health needs of undocumented students who have experienced stressful and traumatic events. The continual threat of deportation and changing laws may increase the risk of anxiety, depression, and substance abuse (Potochnick & Perreria, 2010). It is important for school counselors to educate students and families on their educational rights. Students may be unaware of their rights and therefore do not access their school counselor out of fear their undocumented status will be reported. Students need someone on whom they can count to advocate for them and guide them. School counselors can be integral in this capacity as they work to build rapport with all students in order to create inclusive environments where students feel safe to self-disclose their experiences and background in order to receive the supports needed to learn and thrive.

## References

- Abrego, L. J. (2006). "I can't go to college because I don't have papers": Incorporation patterns of Latino undocumented youth. *Latino Studies, 4*, 212-231.  
doi:10.1057=palgrave.lst.8600200
- Abrego, L. J. (2011). Legal consciousness of undocumented Latinos: Fear and stigma as barriers to claims-making for first and 1.5 generation immigrants. *Law and Society Review, 45*(2), 337-369.
- Allison, A. C., & Ferreira, R. J. (2016). Implementing cognitive behavioral intervention for trauma in schools (CBITS) with Latino youth. *Child Adolescent Social Work Journal 34*(2), 181-189. doi 10.1007/s10560-016-0486-9
- American School Counselor Association. (2016). *ASCA ethical standards*. Retrieved from <https://www.schoolcounselor.org/asca/media/asca/Ethics/EthicalStandards2016.pdf>
- Batalova, J., McHugh, M. (2010). *DREAM vs. reality: An analysis of potential DREAM Act beneficiaries*. Migration Policy Institute. Retrieved from <https://www.migrationpolicy.org/research/dream-vs-reality-analysis-potential-dream-act-beneficiaries>
- Becker Herbst, R., Forooz Sabet, R., Swanson, A., Suarez, L. G., Marques, D. S., Ameen, E. J., & Aldarondo, E. (2018). "They were going to kill me": Resilience in unaccompanied immigrant minors. *The Counseling Psychologist, 46*(2), 241-268.
- Benson, M. A., Abdi, S. M., Ford-Paz, R. E. (2017). Practice applications with immigrant and refugee youth. In A. Hilado & M. Lundy (Eds.), *Models for practice with immigrants and refugees: Collaboration, cultural awareness and integrative theory*, (pp. 339-361). Thousand Oaks, CA: Sage.

- Brabeck, K., & Xu, Q. (2010). The impact of detention and deportation on Latino immigrant children and families: A quantitative exploration. *Hispanic Journal of Behavioral Sciences, 32*(3), 341-361.
- Bronfenbrenner, U. (1977). Toward an experimental ecology of human development. *American Psychologist, 32*(7), 513-531. doi:10.1037/0003-066X.32.7.513
- Bronfenbrenner, U. (1989). Ecological systems theory. In R. Vasta (Ed), *Annals of child development, Vol. 6: Six theories of child development* (pp. 187-249). Greenwich, CT: JAI Press.
- Calderon L., Ferreira O. R., & Shirk, D. A. (2018). *Drug violence in Mexico*. San Diego, CA: University of San Diego. Retrieved from <https://justiceinmexico.org/2018-drug-violence-mexico-report/>
- Crawford, E. R., Aguayo, D., & Valle, F. (2017). Counselors as leaders who advocate for undocumented students' education. *Journal of Research on Leadership Education, 14*(2), 119-150.
- Chen, E. C., Budianto, L., & Wong, K. (2010). Professional school counselors as social justice as advocates for undocumented immigrant students in group work. *The Journal for Specialists in Group Work, 35*(3), 255-261.
- Chishti, M., & Bolter, J. (2018). *Family separation and "zero-tolerance" policies rolled out to stem unwanted migrants but may face challenges*. Retrieved from <https://www.migrationpolicy.org/article/family-separation-and-zero-tolerance-policies-rolled-out-stem-unwanted-migrants-may-face>
- Cohen, J. A., Mannarino, A. P., Berliner, L., & Deblinger, E. (2000). Trauma-focused cognitive behavioral therapy for children and adolescents: An empirical update.

*Journal of Interpersonal Violence*, 15(11), 1202-1223. doi.org/10.1177/08862600015011007

Edwards, T. (2018). I would like to request your academic records: FERPA protections and the Washington public records act. *Washington Law Review*, 93(2), 1057-1088.

Enriquez, L. E. (2011). "Because we feel the pressure and we also feel the support": Examining the educational success of undocumented immigrant Latina/o students. *Harvard Educational Review*, 81, 476-499.

Falcon, S. (2001). Rape as a weapon of war: Advancing human rights for women at the U.S. Mexico border. *Social Justice*, 28(2), 31-50.

Figueroa, A. M. (2017). Speech or silence: Undocumented students' decisions to disclose or disguise their citizenship status in school. *American Educational Research Journal*, 54(3), 485-523.

Gándara, P., & Ee, J. (2018). U.S. immigration enforcement policy and its impact on teaching and learning in the nation's schools. The Civil Right Project, University of California at Los Angeles. Retrieved from <https://www.civilrightsproject.ucla.edu/research/k-12-education/immigration-immigrant-students/u.s.-immigration-enforcement-policy-and-its-impact-on-teaching-and-learning-in-the-nations-schools/Immigration-enforcement-on-schools-093018.pdf>

Gonzales, R. G. (2009). *Young live on hold: The college dreams of undocumented students*. New York, NY: College Board. Retrieved from <https://files.eric.ed.gov/fulltext/ED532871.pdf>

- Gonzales, R. G., Suarez-Orozco, C., & Dedios-Sanguinetti, M. C. (2013). No place to belong: Contextualizing concepts of mental health among undocumented immigrant youth in the United States. *American Behavioral Scientist*, 57(8), 1173-1198.
- Guarnaccia, P. J., Martinez, I., & Acosta, H. (2005). Mental health in the Hispanic immigrant community: An overview. *Journal of Immigrant and Refugee Services*, 3, 21-46.
- Immigrant Legal Resource Center. (2014). Family preparedness plan. Retrieved from <https://www.ilrc.org/family-preparedness-plan>
- Intercultural Development Research Association (IDRA). (2019). *Immigrant students' rights to attend public school*. Retrieved from [https://www.idra.org/education\\_policy/immigrant-children-education/](https://www.idra.org/education_policy/immigrant-children-education/)
- Jaycox, L., Langley, A., & Hoover, S. (2018). *Cognitive behavioral intervention for trauma in schools (CBITS)* (2<sup>nd</sup> ed.). Santa Monica, CA: RAND.
- Junck, A. (2012). Special immigrant juvenile status: Relief for neglected, abused, and abandoned undocumented children. *Juvenile and Family Court Journal*, 63(1), 48-62.
- Lad, K., & Braganza, D. (2013) Increasing knowledge related to the experiences of undocumented immigrants in public schools. *Educational and Administration: Teaching and Program Development*, 24 1-15.
- Leong, F. T., & Lau, A. S. (2001). Barriers to providing effective mental health services to Asian Americans. *Mental Health Services Research*, 3(4), 201-214.

Lindsey K., (2014). *Access to education: Challenges and opportunities for immigrant students*. Retrieved from First Focus <https://firstfocus.org/wp-content/uploads/2013/12/Education-Access-for-Immigrant-Students-2014-06-10-2.pdf>

Lopez, M. H., Taylor, P., Funk, C., & Gonzalez-Barrera, A. (2013). *On immigration policy, deportation relief seen as more important than citizenship: A survey of Hispanics and Asian Americans*. Washington, DC: Pew Research Center. Retrieved from <https://www.pewresearch.org/hispanic/2013/12/19/on-immigration-policy-deportation-relief-seen-as-more-important-than-citizenship/>

Long, J. (2020). *Pursuing the American dream: Expert advice & resources for undocumented college students*. Retrieved from <https://www.affordablecollegesonline.org/college-resource-center/undocumented-college-student-resources/>

McKinney-Vento Homeless Assistance Act. (2002). McKinney-vento homeless assistance act. 42 U.S.C. § 11431 et seq.

Migration Policy Institute. U.S. Immigration and Customs Enforcement (2017). *Fiscal year 2017. ICE enforcement and removals operations report*. Retrieved from <https://www.ice.gov/removal-statistics/2017>

National Conference of State Legislatures. (2019). Undocumented student tuition: An overview. Retrieved from <https://www.ncsl.org/research/education/undocumented-student-tuition-overview.aspx>

National Center for Homeless Education. (2017). Best practices in homeless education brief series. Retrieved from [https://nche.ed.gov/downloads/briefs/imm\\_lia.pdf](https://nche.ed.gov/downloads/briefs/imm_lia.pdf)

National Immigration Law Center (2018). Status of current DACA litigation. Retrieved from <https://www.nilc.org/issues/daca/status-current-daca-litigation/>

- Nguyen, C., & Kebede, M. (2017). Immigrant students in the trump era: What we know and do not know. *Educational Policy*, 31(6), 716. doi:10.1177/0895904817723740
- Passel, J. S., & Cohn, D. (2016). Children of unauthorized immigrants represent rising share of K-12 students. Washington, DC: Pew Research Center. Retrieved from <https://www.pewresearch.org/fact-tank/2016/11/17/children-of-unauthorized-immigrants-represent-rising-share-of-k-12-students/>
- Passel, J. S., & Cohn, D. (2019). Mexicans decline to less than half the U.S. unauthorized immigrant population for the first time. Washington, DC: Pew Research Center. Retrieved from <https://www.pewresearch.org/fact-tank/2019/06/12/us-unauthorized-immigrant-population-2017/>
- Patler, C., Laster Pirtle, W. (2018). From undocumented to lawfully present: do changes to legal status impact psychological wellbeing among Latino immigrant young adults? *Soc. Sci. Med.* 199, 39-48.
- Perez, S. (2018). Guatemala village mourns child who died in U.S. border patrol custody. PBS.org. Retrieved from <https://www.pbs.org/newshour/world/guatemala-village-mourns-child-who-died-in-u-s-border-patrol-custody>
- Pierce, S., Bolter, J., & Selee, A. (2018, July). *U.S. immigration policy under Trump: Deep changes and lasting impacts*. Retrieved from <https://www.migrationpolicy.org/research/us-immigration-policy-trump-deep-changes-impacts>.
- Plyler v. Doe, 457 U.S. 202 (1982).
- Potochnick, S., & Perreira, K. M. (2010). Depression and anxiety among first-generation immigrant Latino youth: Key correlates and implications for future research.

*Journal of Nervous & Mental Disease*, 198(7), 470-477. doi:10.1097/NMD.0b013e3181e4ce24

Ratts, M. J., Singh, A. A., Nassar-McMillan, S., Butler, S. K., McCullough, J. R. (2016). Multicultural and social justice counseling competencies: Guidelines for the counseling profession. *Journal of Multicultural Counseling and Development*, 44, 28-48. doi:10.1002/jmcd.12035

Santiago, C. D., Lennon, J. M., Fuller, A. K., Brewer, S. K., & Kataoka, S. H. (2014). Examining the impact of a family treatment component for CBITS: When and for whom is it helpful? *Journal of Family Psychology*, 28(4), 560-570.

Thabet, A. A., Abed, Y., & Vostanis, P. (2004). Comorbidity of PTSD and depression among refugee children during war conflict. *Journal of Child Psychology and Psychiatry and Allied Disciplines*, 45(3), 533-542.

United Nations High Commissioner for Refugees (UNHCR). (2014). *Children on the run: Unaccompanied children leaving Central America and Mexico and the need for international protection*. Washington, DC: Author. Retrieved <http://www.unhcr.org/en-us/about-us/background/56fc266f4/children-on-the-run-full-report.html>

U.S. Department of Education (2014). *Fact sheet for families and school staff: Limitations on DHS immigration enforcement actions at sensitive locations*. Retrieved from <https://www2.ed.gov/about/overview/focus/safe-spaces-fact-sheet.pdf>

U.S. Department of Education. (2015). *Resource guide: Supporting undocumented youth*. Retrieved from <https://www2.ed.gov/about/overview/focus/supporting-undocumented-youth.pdf>

### **Biographical Statements**

Anjanette Todd earned her Ph.D. in curriculum and instruction with a concentration in counselor education, from the University of South Florida. Dr. Todd is an assistant professor of school counseling at the University of Texas at El Paso. Dr. Todd is a certified school counselor and a national board-certified teacher in the area of school counseling. Her 13 years of experience working as a school counselor includes pre-K through college level students. School counselor self-care, counselor wellness and multicultural counseling are areas of research interests.

Crystal Ayala is a licensed professional counselor intern (LPC-I). She received her master's degree in mental health counseling from the University of Texas at El Paso. Her research interests include, mental health of undocumented immigrants, PTSD in children and adolescents, mindfulness-based treatments, and trauma in ethnic minorities.

Karen Barraza is a graduate student in the master's in mental health counseling program at the University of Texas at El Paso. Karen's research interests include mental health treatment interventions within the judicial system, trauma in minority groups, and treatment interventions with individuals with substance use disorders.