



March 18, 2026  
Washington, DC

House Subcommittee on Constitution and Limited Government Hearing:  
*Immigration Policy by Court Order: The Adverse Effects of Plyler v. Doe*

Members of the House Subcommittee on Constitution and Limited Government,

Through its guarantee of equal access to free public K-12 education for all children, the Supreme Court's decision in *Plyler v. Doe* has quietly underwritten decades of economic advancement, social mobility, and public health, strengthening families and communities across the country. Every state in the country has benefited economically from the *Plyler* decision, yet we are seeing a resurgence of attacks on the right of all children residing in the United States to receive an education.

At FWD.us, a bipartisan advocacy organization with a focus on immigration reform, we recently published a report titled, *The Power of Plyler*, which outlines the incredible economic and societal benefits that have resulted from the *Plyler* decision. It also foreshadows the tremendous upheaval that would result if the decision were reversed and undocumented children were excluded from America's schools. Specifically, our research found that *Plyler* has:

- **Resulted in its beneficiaries paying more** in state and local income taxes over their lifetimes than the total cost of educating them by more than \$633 billion.
- **Alleviated child poverty**, preventing an additional 730,000 U.S. citizen children of adult *Plyler* beneficiaries from living in poverty.
- **Improved public health** across a number of health outcomes, including obesity, lifetime disability, infant mortality, infant health, childhood influenza, and mental health

By enabling undocumented children to complete high school regardless of their immigration status, Plyler has provided essential tools for social and economic integration and a foundation for basic public health.

We are submitting the entirety of this report to the Subcommittee for the record.

Mark Delich  
Vice President, Government Relations  
FWD.us



# The Power of *Plyler*

The societal and economic gains of equal access to education for undocumented children and the future losses if it is taken away

## *Report Highlights*

The guarantee of equal access to public education for *all* children enshrined in *Plyler v. Doe* has:

- **Grown state and local government bottom lines**, with total state and local income taxes paid by *Plyler* beneficiaries over their lifetimes exceeding the state and local costs of educating them by over **\$633 billion**.
- **Increased the income of its beneficiaries** by \$171 billion between 1982 and 2022 and will increase GDP by **\$2.71 trillion** over their lifetimes.
- **Alleviated child poverty**, preventing an additional **730,000 U.S. citizen children** of adult *Plyler* beneficiaries from living in poverty.
- **Strengthened the U.S. workforce**, allowing more than **350,000 adult beneficiaries to work in jobs typically requiring some college education**. Nearly one-fifth of them work in industries that typically require many college-educated workers, with 45,000 *Plyler* beneficiaries working in elementary and secondary schools and 42,000 in hospitals.
- **Improved public health** across a number of health outcomes, including obesity, lifetime disability, infant mortality, infant health, childhood influenza, and mental health—reducing healthcare costs by at least **\$28.9 billion** since 1982.

“It was in school that I first learned about how big the world is. We studied maps, cultures, and histories that were so different from my own. It made me dream bigger and realize there was more out there for me to explore.”

GLORIA, 23, IMMIGRATED FROM MEXICO AT AGE 6

“School wasn’t just about books; it was about opening doors. I learned English there, I learned to dream there, and I learned to work hard for the future I wanted. It gave me hope when my family was struggling.”

RAFAEL, 25, IMMIGRATED FROM COLOMBIA AT AGE 7

## Introduction

In June 1982, the Supreme Court issued its decision in [Plyler v. Doe](#), striking down a 1975 Texas law that allowed local school districts to exclude undocumented children from public schools. The Court’s decision put in place a cornerstone of the American education system that, for over 40 years, has protected equal access to public K-12 education for *all* children living in the United States, regardless of their immigration status. The Court in *Plyler* recognized the fundamental role education plays, not only in shaping individual lives, but also in our broader society and economy. Since then, at least 4.8 million children have benefited from access to *Plyler*’s protections, including approximately 1.8 million current school-age children.

Through its guarantee of equal access to free public K-12 education for all children, *Plyler* has quietly underwritten decades of economic advancement, social mobility, and public health, strengthening families and communities across the country. This report sets out to show how *Plyler* has served as an engine of economic growth and skilled labor in our workforce, and improved health outcomes for over 40 years. It also examines what would happen if *Plyler* were reversed and undocumented students were excluded from America’s public schools.

***FWD.us brought together leading economists, demographers, and sociologists to measure the retrospective gains of Plyler and the prospective losses if Plyler were reversed and undocumented children were excluded from public schools.***

By enabling undocumented children to complete high school regardless of their immigration status, *Plyler* provided essential tools for social and economic integration and a foundation for basic public health. At a high level, the FWD.us research team found that *Plyler*'s equal access to education:

- **Grew state and local government bottom lines**, with total state and local income tax paid by *Plyler* beneficiaries over their lifetimes exceeding the state and local costs of educating them by over **\$633 billion**;
- **Increased the income of *Plyler* beneficiaries** by \$171 billion between 1982 and 2022, contributing to the overall U.S. economy, and will increase GDP by **\$2.71 trillion** over their lifetimes;
- **Prevented an additional 730,000 U.S. citizen children of adult beneficiaries of *Plyler* from living in poverty**;
- **Strengthened the U.S. workforce**, allowing almost three-quarters of adult *Plyler* beneficiaries—over 1.6 million people—to work in occupations often requiring a high school education, including more than **350,000 in occupations typically requiring some college education**; and
- **Improved public health** across a number of health outcomes, including: obesity, lifetime disability, infant mortality, infant health, childhood influenza, and mental health—reducing healthcare costs by at least **\$28.9 billion** since 1982.

Despite these significant social gains, however, *Plyler*'s guarantee of equal access to K-12 education has recently come under increased scrutiny. This report also shows how a reversal of *Plyler* and the exclusion of undocumented children from America's schools would result in massive social and economic upheaval. Indeed, if *Plyler* were to be reversed and undocumented children were excluded from public schools:

- **The U.S. economy would shrink**, with income losses over the lifetimes of *Plyler* beneficiaries amounting to more than **\$1 trillion**;
- The future workforce for U.S. businesses would shift, with a **loss of more than 450,000 workers in occupations typically requiring a high school diploma and some 300,000 in industries typically requiring many college-educated workers**; and
- **Healthcare costs would increase** due to preventable conditions, with governments, individuals, nonprofits, and medical institutions incurring **\$24.2 billion** in additional health-related costs.

*Plyler*'s guarantee of equal access to K-12 education has not only provided educational opportunity, stability, and social mobility for millions of children, but it has made significant contributions to our economy, alleviated child poverty, grown state and local tax coffers, strengthened our workforce, and improved public health. And *Plyler* more than pays for itself. A reversal of *Plyler* and the exclusion of undocumented children from public schools would have disastrous consequences.

*\*Information on this report's methodology may be found below. Retrospective gains and prospective losses for specific states and jurisdictions may be found in the Appendix.*



## ***Plyler v. Doe* – A Brief History**

*Plyler v. Doe*, 457 U.S. 202 (1982), arose from a challenge to a 1975 Texas law that withheld state education funds for undocumented children and gave municipalities the option of charging undocumented children tuition to attend public schools or excluding them altogether. A number of students, represented by the [Mexican American Legal Defense and Educational Fund \(MALDEF\)](#), brought a legal challenge against James Plyler, then-Superintendent of the Independent School District in Tyler, Texas, and others, that ultimately made its way to the Supreme Court in 1982. In its decision, the Supreme Court held that the Fourteenth Amendment's Equal Protection Clause applied to undocumented children living in Texas and prohibited the exclusion of undocumented children from public education. Writing for the Court, [Justice William Brennan concluded](#), "By denying these children a basic education, we deny them the ability to live within the basic structure of our civic institutions."

Recently, the central constitutional tenet of *Plyler*—that the government must provide the same free public K-12 education for undocumented children that it does for U.S. citizen children—has been questioned. This scrutiny, however, merely marks a [new chapter in the opposition to \*Plyler\*](#), which reached its apex in 1994 when California passed Proposition 187. Proposition 187 required verification of the immigration status of parents and students to receive social services and the exclusion of undocumented children from public schools. Though Proposition 187 was ultimately deemed unconstitutional under *Plyler*, it presaged challenges to come and laid the groundwork for current attacks. Courts, however, have continually reaffirmed *Plyler*'s core holding and it remains a bedrock of constitutional law.

# The Beneficiaries of *Plyler*

Some 4.8 million people living in the U.S. have benefitted from *Plyler's* guarantee of equal educational access since 1982. The *Plyler* cohort is broken up into three distinct groups:

## Voices of *Plyler* Beneficiaries

*Plyler's* guarantee of universal equal access to public education plays a critical role in social integration and nurturing strong and healthy children with a sense of possibility and opportunity:

"School was where I could forget everything else. In the classroom, I was just a kid like everyone else. I didn't feel different, and that made all the difference. It gave me a sense of belonging that I carried with me through life."

**DIEGO, 24, IMMIGRATED FROM EL SALVADOR AT AGE 3**

"When everything else in life felt uncertain—when things at home weren't going well, or we had to move apartments again—school was always there. It was the one place I knew I'd have structure, friends, and a chance to focus on something good."

**MINJUN, 26, IMMIGRATED FROM SOUTH KOREA AT AGE 6**

"I was the quietest kid in class, but my teacher encouraged me to join the debate team. I was terrified, but she saw something in me. Speaking in front of people was the scariest thing I'd ever done, but it also gave me confidence I didn't know I had."

**PACO, 20, IMMIGRATED FROM PERU AT AGE 11**

"Once I learned enough English, I became my mom's voice. I'd go to the doctor with her, translate letters from the school, and even help her talk to our landlord. It was a lot of responsibility for a kid, but I was proud to be able to help my family."

**DANIEL, 21, IMMIGRATED FROM HONDURAS AT AGE 6**

## 1 ADULTS WHO BENEFITED FROM *PLYLER* AND HAVE SINCE ADJUSTED THEIR IMMIGRATION STATUS

This group includes approximately 430,000 people who arrived in the United States as undocumented immigrants and who subsequently became citizens or legal permanent residents (LPRs). The vast majority of this group gained legal status through the Immigration Reform and Control Act of 1986 (IRCA) during the Reagan administration, which provided a pathway for legalization for certain undocumented immigrants at that time. On average, this group arrived in the U.S. at age 7 with about 3 years of education. They have spent an average of 44 years in the U.S. and acquired, on average, 8 years of education under *Plyler*.

## 2 CURRENTLY UNDOCUMENTED ADULTS WHO PREVIOUSLY BENEFITED FROM *PLYLER*

This group includes approximately 2.6 million people who reached the age of 18 prior to 2022 and who remain undocumented. On average, this group arrived in the U.S. at age 10 with about 5 years of education. They have spent an average of 21 years in the U.S. and acquired at least 6 years, on average, of education under *Plyler*.

## 3 CURRENTLY UNDOCUMENTED SCHOOL-AGE CHILDREN

This group includes approximately 1.8 million undocumented school-age children who are currently covered by *Plyler*. On average, this group arrived at age 8 with 3 years of education. They have spent an average of 3 years in the U.S. and acquired about 2 years of education, on average, under *Plyler* so far.

# The Economic Contributions of *Plyler* Beneficiaries

*Plyler* laid the groundwork for the beneficiaries of those constitutional protections to attain, on average, an additional 5 years of education in the U.S. and, in many cases, to enter the workforce with a high school degree. This has had profound and positive effects on the incomes of *Plyler* beneficiaries and the economy as a whole:

- The additional educational attainment protected by *Plyler* increased the income of current adult beneficiaries by \$171 billion between 1982 and 2022, or approximately \$61,000 per beneficiary in 2023 dollars. Lifetime income gains for adult *Plyler* beneficiaries who are currently living in the U.S. are expected to be \$2.7 trillion, or nearly \$1 million per beneficiary.
- If *Plyler* were reversed and currently undocumented children were excluded from schools, it is estimated that their combined incomes would decrease by more than \$1 trillion—or nearly \$600,000 per beneficiary—over their lifetimes.
- With access to public K-12 education, adult *Plyler* beneficiaries living in the U.S. have been able to better provide for their families, preventing an additional 730,000 U.S. citizen children of current *Plyler* adults from going into poverty.

*Plyler*'s impact on income gains (and potential losses if *Plyler* is reversed) is significant at the state and local levels.

## Net Income Gains & Losses at the State & Local Levels

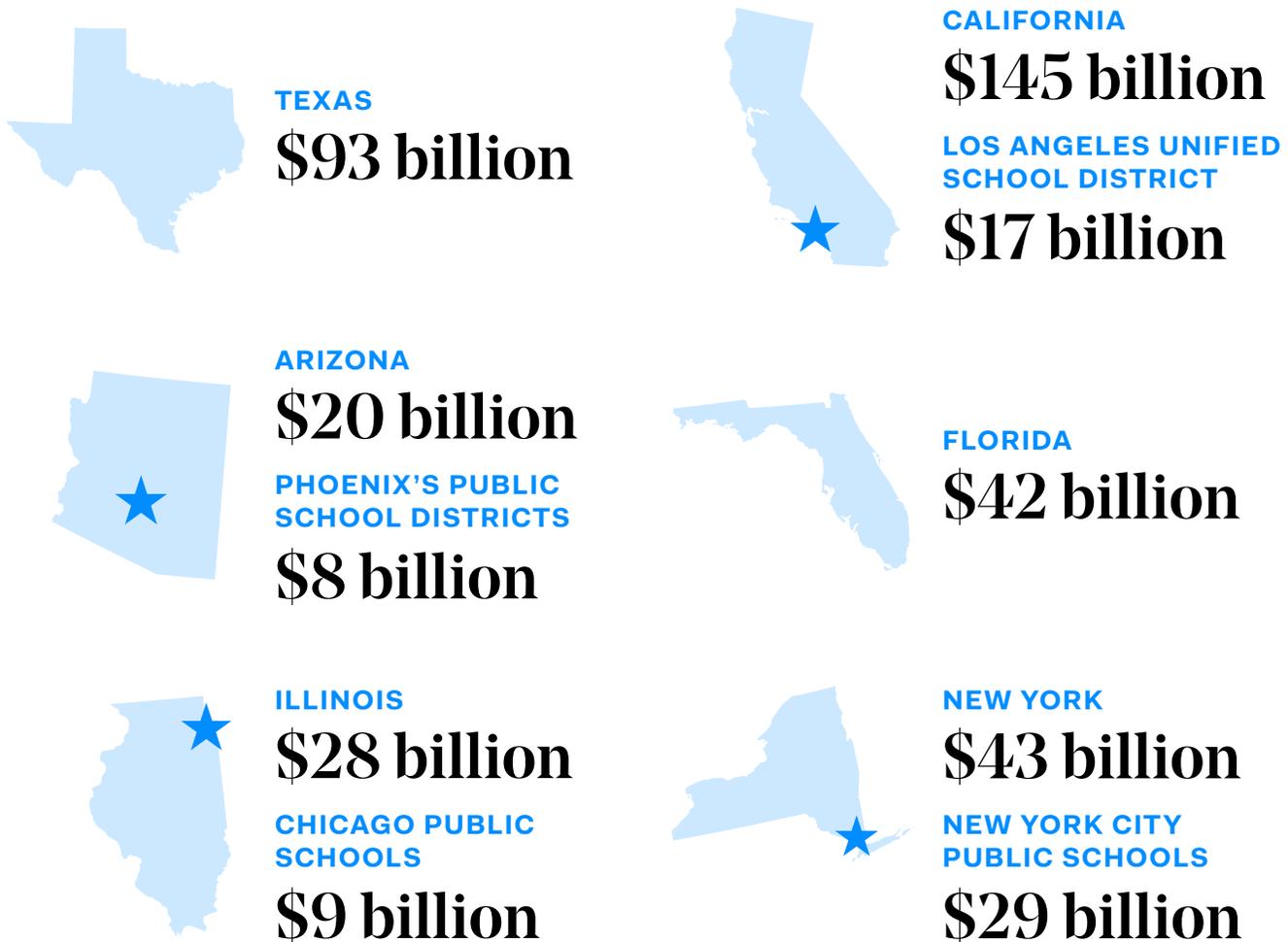
		Net Income <b>Gains</b> of Adult <i>Plyler</i> Beneficiaries over Their Working Lives	Net Future Income <b>Losses</b> if Currently Undocumented Children Were Excluded from Schools
	CALIFORNIA	<b>\$655 billion</b>	<b>-\$99 billion</b>
	LOS ANGELES METRO AREA	<b>\$240 billion</b>	<b>-\$32 billion</b>
	TEXAS	<b>\$373 billion</b>	<b>-\$237 billion</b>
	NEW YORK	<b>\$175 billion</b>	<b>-\$53 billion</b>
	NEW YORK CITY METRO AREA	<b>\$228 billion</b>	<b>-\$94 billion</b>
	FLORIDA	<b>\$146 billion</b>	<b>-\$172 billion</b>
	ILLINOIS	<b>\$121 billion</b>	<b>-\$11 billion</b>
	CHICAGO METRO AREA	<b>\$112 billion</b>	<b>-\$9 billion</b>
	ARIZONA	<b>\$89 billion</b>	<b>-\$29 billion</b>
	PHOENIX METRO AREA	<b>\$61 billion</b>	<b>-\$17 billion</b>

Source: FWD.us estimates based on 2022 American Community Survey data. See Methodology for more information.

Not only has access to education increased Plyler beneficiaries' contribution to the U.S. economy writ large, but the total state and local income tax that will have been paid by current adult Plyler beneficiaries over their lifetimes exceeds the state and local costs of educating them by more than **\$633 billion**. When federal educational transfers to the states are added, that number jumps to almost \$690 billion.

The same is true at the state and school district levels.

### Net Fiscal Gain at the State & Local Levels



Note: Estimates are rounded to billions and are the net state and local revenue after the cost of their education for adult Plyler beneficiaries living in the U.S. as of 2022. See Methodology for more information.

Source: FWD.us estimates based on 2022 American Community Survey data and tax rates developed by the Institute of Taxation and Economic Policy.

# Workforce Contributions of *Plyler* Beneficiaries

*Plyler* guaranteed access to public education for undocumented children, reshaping their futures and, in turn, the fabric of the U.S. labor market. Access to universal public education not only impacted individual career opportunities, but also led to ripple effects across the composition of the labor force, influencing occupational trends, skill availability, and industry demands over time. *Plyler* provided the educational foundation that likely contributed to greater job stability, upward mobility, and overall workforce diversification, benefitting the broader U.S. labor market.

## OCCUPATIONS

**The vast majority of adults who previously benefited from *Plyler* were employed in occupations typically requiring at least a high school diploma in 2022:** more than half (56%, 1.3 million people) in jobs requiring a high school diploma and 15% (352,000) in jobs typically requiring some college education.

### *Plyler* Beneficiaries in Occupations Typically Requiring at Least a High School Diploma – Nationally

Jobs Typically Requiring Some College Education		Jobs Typically Requiring a High School Diploma	
Occupation	<i>Plyler</i> Workers	Occupation	<i>Plyler</i> Workers
Misc. Managers	36,000	Drivers & Truck Drivers	78,000
Software Developers	21,000	Carpenters	69,000
Computer Scientists & Analysts	15,000	Janitors & Building Cleaners	59,000
Sales Managers	12,000	Laborers & Handstockers	57,000
Financial Managers	11,000	Cashiers	54,000
General/Operations Managers	11,000	Waiters & Waitresses	51,000
Other Business Specialists	11,000	Supervisors of Sales Workers	47,000
Service Managers	10,000	Customer Service Reps	47,000
Registered Nurses	10,000	Retail Salespersons	46,000
Marketing Managers	10,000	Other Production & HVAC	37,000

Note: Estimates rounded to thousands. Jobs typically requiring some college education are those in which the overwhelming majority (75%) of all U.S. workers have some college education. Jobs requiring a high school diploma are those in which the overwhelming majority (75%) of all U.S. workers have finished high school. See Methodology for more information. Source: FWD.us estimates based on 2022 American Community Survey data.

California, Texas, Florida, Illinois, and New York all have large numbers of adult *Plyler* beneficiaries working in jobs typically requiring some college education. There are 4,000 registered nurses in Florida, 2,000 computer scientists and software developers in New Jersey, and 5,000 primary school teachers in Texas. Even in newer destination states like Colorado, Georgia, and North Carolina, sizable numbers of *Plyler* adults work in this category of jobs.

## ***Plyler* Beneficiaries in Occupations Typically Requiring at Least a High School Diploma – States**

State	Individuals in Jobs Typically Requiring Some College Education	Individuals in Jobs Typically Requiring a High School Diploma
California	96,000	323,000
Texas	49,000	229,000
Florida	20,000	73,000
Illinois	20,000	67,000
New York	20,000	61,000

Note: Estimates rounded to thousands. Jobs typically requiring some college education are those in which the overwhelming majority (75%) of all U.S. workers have some college education. Jobs requiring a high school diploma are those in which the overwhelming majority (75%) of all U.S. workers have finished high school. See Methodology for more information.  
Source: FWD.us estimates based on 2022 American Community Survey data.

## **INDUSTRIES**

*Plyler* beneficiaries actively contribute to various sectors of the economy. Nearly two-thirds (64%) are employed in industries requiring an overwhelming majority of workers to have a high school diploma, and nearly one-fifth (18%) are in industries requiring an overwhelming majority of workers to have some college education. *Plyler* adults are present in industries like education, the medical sector, banking, consulting, and real estate, and have strong representation in industries like construction, where they make up 4% of the total workforce. California has over 116,000 *Plyler* adults working in industries requiring many workers with some college education. *Plyler* beneficiaries also contribute significantly to the public school system in Texas, where more than 18,000 *Plyler* adults work in elementary and secondary schools.

## ***Plyler* Beneficiaries by Top Industries of Employment – Nationally**

Requiring Many Workers with Some College Education		Requiring Many Workers with a High School Diploma	
Industries	<i>Plyler</i> Workers	Industries	<i>Plyler</i> Workers
Elementary & Secondary Schools	45,000	Construction	444,000
General Medical Hospitals	42,000	Building Services	56,000
Computer Systems Designs	27,000	Supermarkets	47,000

Colleges & Universities	25,000	Truck Transportation	39,000
Outpatient Care Centers	20,000	General Merchandise Stores	36,000
Banking	18,000	Warehousing & Storage	35,000
Consulting Services	16,000	Auto Repair & Maintenance	32,000
Real Estate	14,000	Couriers & Messengers	29,000
Physicians Offices	13,000	Travel Accommodation	28,000
Insurance Carriers	12,000	Private Households	26,000

Note: Estimates rounded to thousands. Industries requiring many workers with some college education are those in which the overwhelming majority (75%) of all U.S. workers have some college education. Industries requiring many workers with a high school diploma are those in which the overwhelming majority (75%) of all U.S. workers have finished high school. See Methodology for more information.

Source: FWD.us estimates based on 2022 American Community Survey data.

### ***Plyler Beneficiaries by Top Industries of Employment – Top States***

<b>State</b>	<b><i>Plyler</i> Workers in Industries Requiring Many Workers with Some College Education</b>	<b><i>Plyler</i> Workers in Industries Requiring Many Workers with a High School Diploma</b>	<b>Top 3 Industries</b>
California	116,000	368,000	Elementary & Secondary Schools, General Medical Hospitals, Computer Systems Designs
Texas	63,000	260,000	Elementary & Secondary Schools, General Medical Hospitals, Computer Systems Designs
Florida	27,000	83,000	Other Healthcare Services, General Medical Hospitals, Motion Pictures
Illinois	23,000	69,000	General Medical Hospitals, Elementary & Secondary Schools, Colleges & Universities
New York	23,000	67,000	Colleges & Universities, Computers Systems Designs, General Medical Hospitals

Note: Estimates rounded to thousands. Industries requiring many workers with some college education are those in which the overwhelming majority (75%) of all U.S. workers have some college education. Industries requiring many workers with a high school diploma are those in which the overwhelming majority (75%) of all U.S. workers have finished high school.

## IMPACT OF ENDING *PLYLER* ON THE WORKFORCE

The projected workforce impact of a potential reversal of *Plyler* and the exclusion of undocumented students from American schools is striking, representing a profound shift in the occupational futures of school-aged *Plyler* beneficiaries and a considerable loss of potential college-educated workers for the U.S. economy. The exclusion of undocumented children from U.S. schools would result in an estimated future loss of 341,000 people working in jobs typically requiring some college education and 110,000 people working in jobs typically requiring a high school education, with the largest losses occurring in Texas and Florida. It would also result in an estimated loss of over 310,000 jobs in industries that typically require many workers with some college education.

### Estimated Losses in Occupations Typically Requiring Some College Education from Ending *Plyler* – Nationally and Top States

	Expected Losses in Occupations Typically Requiring Some College Education
Total U.S.	-341,000
Texas	-60,000
Florida	-58,000
California	-30,000
New Jersey	-20,000
New York	-20,000

Source: FWD.us estimates based on 2022 American Community Survey data. See Methodology for more information.



## Health Contributions of *Plyler* Beneficiaries

Access to education is an important factor in determining numerous health outcomes over the course of a person's life, and exclusion from schools during a person's youth can have devastating consequences. Analyses indicate that the access to education guaranteed by *Plyler* is linked to health benefits across a variety of outcomes to individuals and society at large. Only a select list of examples is presented here, and it is anticipated that the future reversal of *Plyler* would have much larger, deeper, and more dramatic health effects.

### **GENERAL HEALTH AS SEEN THROUGH OBESITY**

The relationship between access to education and obesity is a powerful window into how *Plyler* can impact the general health of a population. Obesity is a predictor of several chronic conditions, including type 2 diabetes, coronary heart disease, hypertension, selected cancers, and musculoskeletal disorders, and is linked to worse economic outcomes throughout life. And the broader economic impact of obesity in the United States is substantial. Research suggests that access to education and school-based obesity prevention programs have reduced obesity levels among children and subsequently lowered obesity risks in adults.

We estimate that:

- Without *Plyler*, there would have been more than 46,000 additional adults who may have been overweight without access to schools between 1982 and 2023, averting approximately \$303 million (2023 dollars) in medical costs; and
- Reversing *Plyler* and excluding undocumented children from schools nationwide would result in over \$156 million in increased medical costs for governments, individuals, non-profits, and medical institutions resulting from over 23,000 additional overweight adults.

## **GENERATIONAL HEALTH AS SEEN THROUGH INFANT MORTALITY AND PRETERM BIRTHS**

Access to education for future parents also impacts *their* children's health and life outcomes. Maternal education is strongly linked to infants' health and later life outcomes, including their education, earnings, and socioeconomic outcomes. Moreover, maternal education is linked to infant mortality rates. Mothers with less education are more likely to experience the death of an infant than mothers with more education. Access to universal public education for future parents is a direct investment in the health and well-being of future generations.

We estimate that:

- *Plyler* may have averted 1,038 U.S.-born infant deaths and reduced preterm births by about 147,000 among women who benefitted from *Plyler* between 1982 and 2023, avoiding medical expenditures in excess of \$9.2 billion; and
- Excluding undocumented children from schools would result in an additional 766 infant deaths and 108,000 preterm births in the future among those currently benefiting from *Plyler*, leading to \$6.8 billion in additional medical expenditures.

## **PUBLIC HEALTH AS SEEN THROUGH INFLUENZA VACCINES**

Influenza is a significant driver of acute respiratory disease, a leading cause of healthcare visits and hospitalization for children in the U.S. Studies have linked access to education and school-based influenza vaccination programs to declines in influenza-like illnesses.

We estimate that:

- Educational access guaranteed by *Plyler* averted about \$1.58 billion in medical costs for *Plyler* beneficiaries between 1982 and 2023; and
- Overturning *Plyler* and excluding undocumented children from U.S. public schools would result in an increase of almost \$600 million during current *Plyler* beneficiaries' remaining school-age years.

## **LONG-TERM HEALTH AS SEEN THROUGH PHYSICAL DISABILITY INTO OLD AGE**

Access to education has health-related consequences that impact a person throughout their life and into old age, when healthcare costs tend to increase. The incidence of “disability”—which for these purposes is defined as a condition that prevents a person from performing activities of daily living such as bathing, dressing, walking, eating, and grooming—is a lens through which to assess the impact of *Plyler* on long-term health. Education attainment is strongly associated with the timing of disability onset in life. People with more education not only live longer on average, but also live more years without a disability.

We estimate that:

- The educational access guaranteed by *Plyler* resulted in a combined 1.1 million additional person-years—the number of impacted persons multiplied by the number of years impacted—lived without disability, saving over \$15 billion between 1982 and 2023; and
- Reversing *Plyler* and excluding undocumented children from schools would result in a collective increase of 725,000 person-years living with a disability and almost \$10 billion in additional costs.

## MENTAL HEALTH AS SEEN THROUGH DEPRESSION

Educational attainment also impacts mental health and, in particular, the extent to which people experience depression, with more education corresponding to a lower incidence of depression and fewer related health costs. For instance, people with depression are more likely to experience arthritis, stroke, diabetes, and asthma.

We estimate that:

- As a result of their U.S. educational attainment, *Plyler* beneficiaries cumulatively and collectively experienced almost 300,000 fewer person-years of depression, saving \$2.1 billion in healthcare costs; and
- If *Plyler* were to be reversed and current undocumented students excluded from schools, current *Plyler* beneficiaries would experience an additional almost 950,000 person-years of depression, resulting in over \$6.6 billion in additional healthcare costs over their lifetimes.

*“My teacher would always tell me, ‘You have a gift. Don’t let anything stop you.’ Those words stayed with me. I don’t know if I would have discovered my love for painting without that support.”*

**JADE, 19, IMMIGRATED FROM GHANA AT AGE 3**

## Conclusion

As these results show, *Plyler*’s guarantee of equal access to public K-12 education has underwritten more than 40 years of economic, health, and societal gains that go far beyond the 4.8 million people who have benefitted from it. These gains, and the security and stability that they provide, further reveal the profound role that education plays in securing the health and well-being of families, communities, and our country as a whole. Universal free public education is an investment in our future.

Reversing *Plyler* and excluding undocumented children from American schools would squander that investment and, as this report shows, wreak havoc on America’s economy, work force, and public health.

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# Methodology

**Demographic estimates** for the number of individuals living in the U.S. as of 2023 who have potentially benefitted from *Plyler* since 1982, and could do so in the future, is based on a combination of three accessible and known populations:

1. Previously undocumented individuals, who are now lawful permanent residents or U.S. citizens and who benefited from *Plyler* protections during the 1980s until they were legalized as part of the 1986 Immigration Reform and Control Act (IRCA);
2. Currently undocumented adults who entered the U.S. before age 18 and who would have had access to public education in the U.S.; and
3. Currently undocumented children who were ages 5 to 19 years old in 2023 and who currently benefit from *Plyler*.

For the first group of current permanent residents and U.S. citizens that legalized under IRCA, [data](#) from the Immigration and Naturalization Service were consulted to obtain the number of individuals, according to their year and age of entry into the U.S., who would have benefited from *Plyler* between 1982 and their year of lawful status. Some 430,000 individuals meet these criteria as being covered by *Plyler's* guarantees prior to legalization. This total target number was used to randomly select individuals according to age, year of entry, and nationality characteristics in the 2022 ACS. This is likely an overcount, as the target population was not reduced by emigration or mortality. As a robustness check, the ratio of those with LPR vs. U.S. citizenship mirrored findings in the [uptake of U.S. citizenship](#) for this population more than a decade after obtaining LPR through IRCA.

Among currently undocumented adults who have benefited from *Plyler* in the past, the number of individuals is determined by [immigration status assignments](#) assigned by FWD.us researchers in the 2022 ACS and projected through the end of 2023. An estimated 2.6 million adults still living in the U.S. meet this criteria as having been covered by *Plyler*. This is certainly a substantial undercount of the total number of once-undocumented adults benefiting from *Plyler* as there were likely other undocumented students with access since 1982, but who have since died, left the U.S., or adjusted status through means other than IRCA.

Undocumented children who are currently benefiting from *Plyler* and who will do so in the future were also determined by FWD.us researchers' immigration status assignments. Particularly important for this estimated population of 1.8 million children are the projections through to the end of 2023 to account for the population of new arrivals, including children, who do not appear in the 2022 ACS.

In all, an estimated 4.8 million individuals have benefited from, or are currently benefiting from, access to free public K-12 education since the *Plyler* decision and lived in the U.S. in 2023. These estimates describe access and not actual use. It is possible that many undocumented individuals who came to the U.S. as teenagers never went to school and thus never benefited from public education in the U.S. Overall, the estimates are considered conservative, particularly regarding *Plyler's* retrospective gains.

Undocumented individuals include those with a protected status, such as DACA, TPS, parole, people seeking asylum, or other protections from deportation. All estimates for the retrospective gains and prospective losses from *Plyler* rely on these demographic assignments in the 2022 ACS, projected to 2023, including any relevant individual-level characteristics that can be of use to estimation. Consequently, 2023 is the pivot year whereby all measures, past and future, hinge, including constant 2023 dollars for economic outcomes.

*Demographic estimates were prepared by Phillip Connor, Research Fellow at Princeton University's Center for Migration and Development.*

**Retrospective economic gains from *Plyler*** are based on synthetically constructed income histories of *Plyler*-benefiting individuals going back to 1982 when each individual turned 18 and likely entered the workforce. A series of counterfactual

income histories in the without-*Plyler* scenario were calculated based on their educational attainment frozen in the past, reducing their likely actual income by about 6% for every uncompleted year of education. Individuals for the without-*Plyler* scenario, now without schooling, are assumed to enter the workforce at age 14. The *net* retrospective economic gains are the total aggregate cumulative incomes for the without-*Plyler* scenario subtracted from the *Plyler* scenario, reported in 2023 dollars.

**Prospective economic losses if Plyler were overturned** are first based on predicted income for each current *Plyler*-benefiting individual in 2023, based on the educational attainment of similar, undocumented adults in 2023. Assuming employment after 12 years of schooling, the future incomes of current *Plyler*-benefiting individuals are allowed to follow an inverted U-shaped earnings curve to accommodate the likely peak of earnings by their mid-fifties and decreasing through to retirement at age 70. By contrast, the predicted income for the same group, but under the without-*Plyler* scenario, are allowed to enter the workforce at age 14, following a similar earnings curve, but without the premium of additional education beyond their frozen level in 2023. The *net* prospective losses are the aggregate cumulative incomes for the *Plyler* scenario subtracted from the without-*Plyler* scenario.

*Plyler* and without-*Plyler* scenario totals, for both the past gains and the future losses, were reduced by the proportion of current *Plyler* adults who were not employed (24%) as of 2023. This allows for a more conservative set of estimates, as we would expect not all individuals to be in the labor force.

*Economic estimates were calculated by Francesc Ortega, Professor of Economics at City University of New York (CUNY). More details on the methods used in preparing these estimates, as well as additional analyses, can be found in [this methodological paper](#).*

**State fiscal estimates** were calculated as the likely total taxes paid by those benefiting from *Plyler* since 1982 according to the same income histories developed for the economic analyses. Tax rates, which included all forms of taxation, were drawn by state from the Institute on Taxation and Economic Policy's (ITEP) [2024 tax tables](#). All individuals benefiting from *Plyler* were assumed to pay state and local taxes according to percentile cut-points for family income. (According to the 2022 ACS, family income distribution was similar to individual-level income distribution). To simplify this exercise, tax rates were considered constant prior to and following 2024 tax rates. Past income histories were projected through to age 70 and discounted by 24% to conservatively assess the aggregate, cumulative income of working persons only.

For the cost of *Plyler*-benefiting individuals, the 2023 cost of educating a student in each state, according to the 2022 Census of Governments, was calculated according to the number of years they would have benefitted from *Plyler*. Individuals were assumed not to have moved states during their educational attainment or working lives. The aggregate, cumulative costs of their public education, conservatively assuming all went to school for all 12 years, were calculated and subtracted from their total tax contributions for each state. The *net* result is the additional tax revenue in each state from the *Plyler*-benefitting population for their lifetimes beyond the cost of educating them for K-through-12 school years.

*State fiscal estimates were calculated by Joshua Miraglia, Ph.D. candidate in economics at City University of New York Graduate Center, under the supervision of Francesc Ortega, Professor of Economics at City University of New York (CUNY). More details on the methods used in preparing these estimates, as well as additional analyses, can be found in [this methodological paper](#).*

**Children pushed into poverty without Plyler** is based on the number of dependent children (less than 18 years old) in 2023 who fall below the family poverty level after the replacement of without-*Plyler* income in 2023 of their *Plyler*-benefitting parents, as calculated for retrospective income histories described above. Children pushed into poverty are the additional number of children who would live below the 100% family poverty level in 2023 after these income adjustments without *Plyler*.

*Poverty estimates of dependent children for the without-*Plyler* scenario were prepared by Phillip Connor, Research Fellow at Princeton University's Center for Migration and Development.*

**Past labor force gains through Plyler** were calculated using the educational attainment for the total U.S. working population, creating groups of occupations and industries where the overwhelming majority (75%) achieved a certain education threshold for a particular occupation or industry. Three categories are included: (1) jobs requiring at least some college education; (2) jobs requiring at least a high school diploma; and (3) jobs requiring less than a high school diploma. Using *Plyler* status assignments listed earlier in the 2022 ACS, the analysis aggregates the number of adult *Plyler* beneficiaries who have been gained in occupations typically requiring some higher education and in occupations requiring at least a high school education.

**Potential future labor force losses without Plyler** were calculated using a random forest algorithm to predict the occupational and industrial skill levels that children currently benefiting from *Plyler* might possess as adults. The model is trained on data from previous adult beneficiaries of *Plyler* who are prime working age, using a range of predictor variables, including years of education, age at arrival, country of birth, sex, race, Hispanic ethnicity, state of residence, and protected legal status.

*Labor force estimates were calculated by Matthew Hall, Professor and Director of the Cornell Population Center at Cornell University. More details on the methods used in preparing these estimates, as well as additional analyses, can be found in [this methodological paper](#).*

**Health outcomes with and without Plyler** are based on educational attainment, usually in the completion of secondary school, assessing the gains and losses with and without *Plyler* for *Plyler* beneficiaries. Since most health outcomes are based on annual events, the total number of person-years for *Plyler*-benefitting individuals is assessed both for the *Plyler*-benefitting adult population from 1982 to 2023 and also for *Plyler*-benefitting adults and children for future years. All metrics are calculated for lifetime health outcomes, with education typically presenting greater influence in later years of life, long after completing their education in public schools.

Although immigrants tend to be healthier than their counterparts in the U.S. and their origin countries, their health advantage may not persist. Research shows that immigrant health converges with the health of the U.S.-born population over time, particularly for immigrants who arrive as children.

Each health outcome calculation relies on a different set of studies to estimate health-related impacts of *Plyler*. A limited number of studies are available for health-related outcomes by education and associated lifetime impacts on health, particularly for the undocumented immigrant population. Thus, the outcomes presented here are meant to be *indicators* of the potential retrospective gains and prospective losses associated with *Plyler*. The negative health outcomes averted through *Plyler*'s guarantees are not meant to be exhaustive, but a sampling of potential outcomes. The analyses offer a window into the devastating lifetime health consequences that a generation of immigrant school children could experience throughout their lifetimes without access to public education.

**Obesity.** A randomized controlled trial of an obesity prevention program among middle schoolers found that participation in the program lowered the risk of adulthood obesity. The report applied the results of this experiment to the number of individuals with and without access to school-based programs to derive the number of overweight adults averted through *Plyler* in the past and in the future. Total medical costs associated with excess obesity are based on the average cost per capita published in the same study.

**Lifetime disability.** Educational attainment has a direct relationship with the onset of disability in later life. Disability is defined as being unable to conduct activities of daily living like bathing, dressing, walking, eating, etc. A recent study found that people without a high school diploma spent more years in disability than people with a high school diploma, and differences were more pronounced among women. Rates of lifetime disability years from this study were applied by sex to the *Plyler*-benefitting population to estimate the potential impact of *Plyler* on disability. Excess expenditures associated with increased disability were estimated using costs published in a separate study.

*Infant mortality and preterm births to Plyler Women.* Studies consistently find that women with less education have a greater risk of preterm birth and infant mortality than women with more education. The report estimates excess infant mortality and preterm births by applying the increased risks in the absence of *Plyler's* guarantees to the expected number of births projected by the total fertility rate for Hispanic women living in the U.S.

*Childhood influenza.* School-based immunization programs improve vaccination rates and health outcomes for students and their immediate family members. The analysis drew on clinical trial studies of school-based influenza immunization programs to calculate healthcare cost savings associated with greater school access through *Plyler*, net of costs to administer vaccines.

*Lifetime depression.* A twin study that controlled for genetic and environmental factors found that depression decreased with greater educational attainment. The analysis applied the excess depression rates associated with lower education from the twin study to the *Plyler*-benefitting population to estimate excess lifetime depression in the absence of *Plyler's* guarantee of equal access to public education. Excess healthcare costs due to increased depression were calculated using depression-associated health expenditures published in a separate study.

*Health outcome estimates were calculated by Heeju Sohn, Assistant Professor of Sociology at Emory University. More details on the methods used in preparing these estimates, including underlying studies used to calculate the incidents of health events and related costs, can be found in [this methodological paper](#).*

**Quotes** are part of an extensive mixed-methods research project of undocumented immigrants enrolled in higher education institutions throughout New York City, and were an undocumented K-12 student at some point in their educational careers. The research was funded by the William T. Grant Foundation and Russell Sage Foundation. A more complete analysis of findings from the study can be found in Amy Hsin and Sofya Apketar's book, *Beyond Dreamers: School, Work and Identity among Diverse Undocumented New Yorkers*, which will be published by the Russell Sage Foundation. To protect the confidentiality and anonymity of those interviewed, pseudonyms are used and any identifying information was not included.

*Quotes were provided by Amy Hsin, Professor of Migration at Keogh School of Global Affairs, University of Notre Dame.*

# *Appendix*

- [The Power of Plyler in Arizona](#)
- [The Power of Plyler in California](#)
- [The Power of Plyler in Colorado](#)
- [The Power of Plyler in Florida](#)
- [The Power of Plyler in Georgia](#)
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