



February 17, 2026

The Honorable Kristi Noem
Secretary of Homeland Security
U.S. Department of Homeland Security
2707 Martin Luther King Jr Ave SE
Washington, DC 20528

The Honorable Todd Lyons
Acting Director, U.S. Immigration and Customs Enforcement
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20024

Re: Educational Implications of Immigration Enforcement Actions

Dear Secretary Noem and Acting Director Lyons:

We write on behalf of the Board of Directors of the National Academy of Education (NAEd) to request that the U.S. Immigration and Customs Enforcement (ICE) within the Department of Homeland Security (DHS) enact practices to ensure that all students feel safe and secure attending school and all parents and guardians feel safe bringing their children to and from school. Given our extensive history of working to ensure that high-quality research informs policy and practice, we write to (1) summarize the research evidence on the impact of ICE's enforcement actions on child development and school communities; and (2) offer research-informed recommendations to protect the well-being of children, families, and educators who represent our nation's future.

The NAEd is a nonpartisan, nonprofit organization that advances high-quality research to improve education policy and practice. Founded in 1965, the NAEd has approximately 350 members, including those in the United States and international associates, who are elected on the basis of their leading and trusted scholarship related to education. The NAEd membership includes some of the most distinguished scholars and leaders in education, such as current and former university presidents, provosts and deans; directors of research think tanks; presidents of foundations; presidents and members of distinguished scientific societies; and members of White House commissions. Among other things, the NAEd undertakes research studies to address pressing educational issues and provides research-based recommendations and guidance on such matters.



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Education has long been recognized as the backbone of our American democracy, and we have a strong legal and moral tradition of educating all children, regardless of their immigration status.¹ Historically, schools have been protected spaces in our society designed to nurture healthy development and educate and socialize future generations to democratic values. Moreover, while approximately 6.3 million children under the age of 18 live with at least one unauthorized immigrant parent, all but about 1 million of those children are U.S. citizens.² Research demonstrates, however, that the current immigration enforcement actions occurring across the country can have negative effects on *all* students in our schools.³

Educators are reporting plummeting student attendance, decreased enrollments, emotional withdrawal, and fear and trauma associated with enforcement actions, *regardless of the students' immigration status*.⁴ Research demonstrates that heightened immigration enforcement negatively affects student achievement, student attendance, and absenteeism.⁵ A recent study indicates that the raids in California's Central Valley coincided with a 22 percent increase in daily student absences, with particularly large increases among the youngest students.⁶ In addition to involuntary separations, persistent threats of separation have significant implications for the mental health of children and

¹ See, e.g., *Plyler v. Doe*, 457 U.S. 202 (1982).

² Gelatt, J., Ruiz Soto, A. G., & Bachmeier, J. D. (2025). *Changing Origins, Rising Numbers: Unauthorized Immigrants in the United States*. Migration Policy Institute. Retrieved from: <https://www.migrationpolicy.org/research/Unauthorized-immigrants-us-2025-fact-sheet>.

³ Pillai, D., Artiga, S., & Rae, M. (2025). *Potential Impacts of Increased Immigration Enforcement on School Attendance and Funding*. KFF. Retrieved from: <https://www.kff.org/racial-equity-and-health-policy/potential-impacts-of-increased-immigration-enforcement-on-school-attendance-and-funding/>; Ee, J., & Gándara, P. (2020). The Impact of Immigration Enforcement on the Nation's Schools. *American Educational Research Journal*, 57(2), 840–871. Retrieved from: <https://doi.org/10.3102/0002831219862998>.

⁴ See, e.g., Rogers, J., Kahne, J., La Torre, D., Castro, C., Stern, S., Bronstein, M. and Ishimoto, M. (2025). *The Fear is Everywhere: U.S. High School Principals Report Widespread Effects of Immigration Enforcement*. UCLA's Institute for Democracy, Education, and Access. Retrieved from: <https://idea.gseis.ucla.edu/publications/fear-is-everywhere/>; Alvarez, B. (2025). *The Trauma Immigration Raids Leave in Classrooms*, NEA Today. Retrieved from:

<https://www.nea.org/nea-today/all-news-articles/trauma-immigration-raids-leave-classrooms>.

⁵ See, e.g., Mumma, K. S. (2025). *Absent and Afraid? Immigration Enforcement and Student Attendance in the Second Trump Administration*. (EdWorkingPaper: 25-1265). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/vxtn-r577>; Pillai, D., Artiga, S., & Rae, M. (2025). *Potential Impacts of Increased Immigration Enforcement on School Attendance and Funding*. KFF. Retrieved from: <https://www.kff.org/racial-equity-and-health-policy/potential-impacts-of-increased-immigration-enforcement-on-school-attendance-and-funding/>; Dee, T. S. (2025). *Recent Immigration Raids Increased Student Absences*. (EdWorkingPaper: 25-1202). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/a62e-h526>; Bellows, L. (2019). Immigration Enforcement and Student Achievement in the Wake of Secure Communities. *AERA Open*, 5(4), 1–20. <https://doi.org/10.1177/2332858419884891>; Ee, J., & Gándara, P. (2020). The Impact of Immigration Enforcement on the Nation's Schools. *American Educational Research Journal*, 57(2), 840–871. Retrieved from: <https://doi.org/10.3102/0002831219862998>.

⁶ Dee, T. S. (2025). *Recent Immigration Raids Increased Student Absences*. (EdWorkingPaper: 25-1202). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/a62e-h526>.

families, interfering with healthy development.⁷ For children, these mental health harms of forcible separation and the threat of separation include toxic stress, long-term risk for psychiatric disorders, chronic anticipatory anxiety, disengagement, and heightened emotional distress.⁸

These enforcement actions harm not only students in immigrant families but also classmates and schools more broadly through disrupted learning environments; fear for themselves, friends, and classmates; strained student supports; and attendance-linked funding impacts in many states.⁹ As the research and news reports demonstrate, immigration enforcement actions in communities, regardless of where they occur, have a chilling effect on student attendance, harm students' well-being, and impact the school climate of the entire school.

First, we ask that DHS and ICE seriously consider these educational implications when making enforcement decisions in light of the substantial body of research evidence.

Second, we write to urge DHS and ICE to restore and publicly reaffirm a clear policy that civil immigration enforcement actions will not occur at, or be focused on, schools and school-related settings—except in the narrowest circumstances. For decades, DHS and its predecessor agencies recognized that schools occupy a special place in our civil society and that fear of enforcement in or near schools undermines access to education and harms children's well-being.¹⁰ In 2021, DHS issued “Guidelines for Enforcement Actions in or Near Protected Areas,” restricting law enforcement activities “to the fullest extent possible” in or near “protected areas.” The directive indicated that it is a fundamental principle to refrain from law enforcement actions in or near locations that would “restrain people’s access to essential services or engagement in essential activities,” including but not limited to schools, childcare facilities, shelters, medical facilities, social services establishments, and places of worship.¹¹ In addition to specifically identifying the examples of “[a] school, such as a pre-school, primary or secondary school, vocational or

⁷ Fortuna, L., Gutierrez, K., Mendoza, P., Abbas, O., Nguy, A., & Vega-Portler, N. J. (2025). Special Report: U.S. Immigration Policy and the Mental Health of Children and Families. *Psychiatric News* 60, 8. Retrieved from: <https://doi.org/10.1176/appi.pn.2025.08..8.19>.

⁸ *Id.*

⁹ Pillai, D., Artiga, S., & Rae, M. (2025). *Potential Impacts of Increased Immigration Enforcement on School Attendance and Funding*. KFF. Retrieved from: <https://www.kff.org/racial-equity-and-health-policy/potential-impacts-of-increased-immigration-enforcement-on-school-attendance-and-funding/>; Ee, J., & Gándara, P. (2020). The Impact of Immigration Enforcement on the Nation’s Schools. *American Educational Research Journal*, 57(2), 840–871. Retrieved from: <https://doi.org/10.3102/0002831219862998>.

¹⁰ See, e.g., James A. Puleo, Acting Associate Commissioner of the Immigration and Naturalization Service (INS), the predecessor agency to DHS). (May 17, 1993). *Enforcement Activities at Schools, Places of Worship, or at Funerals or Other Religious Services* (HQ-807-P). Retrieved from: https://www.ice.gov/doclib/foia/policy/10029.1_EnforcementActivitiesSchoolsPlacesWorship_05.17.1993.pdf; John Morton, Director of U.S. Immigration and Customs Enforcement. (Oct. 24, 2011). *Enforcement Actions at or Focused on Sensitive Locations*. (ICE Policy No. 10029.2). Retrieved from: <https://www.ice.gov/doclib/ero-outreach/pdf/10029.2-policy.pdf>.

¹¹ Alejandro M. Mayorkas, Secretary of the U.S. Department of Homeland Security. (Oct. 27, 2021). *Guidelines for Enforcement Actions in or Near Protected Areas*, at pp. 2-3. Retrieved from: <https://www.ice.gov/doclib/news/guidelines-civilimmigrationlaw10272021.pdf>.

trade school, or college and university,” it also calls for protections for “[a] place where children gather, such as a playground, recreation center, childcare center, before- or after-school care center, foster care facility, group home for children, or school bus stop.”¹²

On January 20, 2025, Acting Secretary of the U.S. Department of Homeland Security Benjamine Huffman rescinded the 2021 guidelines.¹³ The then-Acting Director of ICE, Caleb Vitello, determined not to issue any “bright line rules” and left discretion to the field office directors and assistant special agents in charge.¹⁴

We are concerned that the removal of clear “protected areas/sensitive locations” constraints has created predictable, systemwide harms for students, families, and schools. Increased ICE enforcement actions, including at and near formerly protected areas, are reported daily in the media and confirmed by the Trump administration.

We know that enforcement activities and the threat of such activities harm students’ learning and physical and mental health and have negative schooling implications. Further, research demonstrates that schools with “safe-zone policies” – similar to the federal policies adopted by DHS in 2021 – can mitigate some of the harm, including reducing educational disruption, protecting academic progression, and supporting student well-being.¹⁵

Taken together, this evidence supports a straightforward conclusion: when schools are perceived as enforcement-adjacent spaces, families make decisions to avoid risk – regardless of their children’s immigration status – keeping children home, reducing engagement with educators, and disengaging from critical school-provided services. And when schools are sites of enforcement actions, students are traumatized. As demonstrated above, these actions harm not only students in immigrant families but also classmates and schools more broadly.

For all of these reasons, we respectfully request that ICE:

1. **Reinstate and publicly publish a clear directive** that civil immigration enforcement actions will not occur **at or near schools**, except under tightly defined exigent circumstances.
2. **Define “near” schools** in operational terms (e.g., bus stops, drop-off/pick-up zones, school events, sidewalks, entrances, parking areas, and adjacent spaces

¹² *Id.* at pp. 2-3.

¹³ Benjamine Huffman, Acting Secretary of U.S. Department of Homeland Security. (January 20, 2025). *Enforcement Actions in or Near Protected Areas*. Retrieved from: https://www.dhs.gov/sites/default/files/2025-03/25_0120_S1_enforcement-actions-in-near-protected-areas.pdf.

¹⁴ Caleb Vitello, U.S. Immigration and Customs Enforcement Acting Director. (Jan. 31, 2025). *Common Sense Enforcement Actions in or Near Protected Areas*, at pp. 1-2. Retrieved from: <https://www.ice.gov/doclib/foia/policy/CommonSenseEnforcementActInNearProtectedAreas.pdf>.

¹⁵ See, e.g., Amuedo-Dorantes, C., & Bucheli, J.R. (2026). *Safe-Zone Schools and the Pursuit of Equity for Immigrant Youth*. William T. Grant Foundation. Retrieved from: <https://wtgrantfoundation.org/digest/safe-zone-schools-and-the-pursuit-of-equity-for-immigrant-youth>.

commonly used by students and caregivers such as playgrounds), so families and school leaders can rely on the policy in practice, not just in principle.

3. **Require written, trackable supervisory approval** for any proposed enforcement action implicating school settings, with prompt post-action reporting and meaningful accountability mechanisms.
4. **Issue training and implementation guidance** for ICE personnel and relevant partners to ensure consistent compliance nationwide.

Schools and educators will continue to confront the impact of enforcement actions in their communities when they enter their schools and classrooms. Implementing these policies, however, will allow educators the ability to focus on their important work and not have to prepare for potentially disruptive and traumatizing enforcement actions in schooling spaces. Moreover, *all* children can attend schools and childcare facilities without worrying that they, their friends, or their family members will be targeted, and *all* parents can drop their children off at schools and childcare centers without worrying that they will be caught up in a law enforcement raid.

Our membership includes highly regarded education scholars who are experts in schooling; pedagogy; and student achievement, safety, and well-being. We stand ready to review with your team the research evidence, provide additional research findings, guidance, and resources, facilitate connections with experts, discuss practical implementation details, and identify a path to restoring public confidence that schools will remain places where all children can learn without fear.

Sincerely,

A handwritten signature in cursive script, appearing to read "Artiles J".

Alfredo J. Artiles
President, National Academy of Education
On behalf of the NAEd Board of Directors