

Plyler v. Doe Case Explainer

On June 15, 1982, the U.S. Supreme Court [ruled](#) that it was a violation of the Equal Protection Clause of the Constitution for a state to discriminate against undocumented children by denying them access to a state’s system of free public K-12 education. [Plyler](#) is a watershed case that is critical in protecting access to public education and preventing policies and actions that chill that access.

Issues before the U.S. Supreme Court

The issue before the Court was whether the State of Texas could deny undocumented children access to the free public education it provides to children who are U.S. citizens and lawfully residing immigrants. Also, whether the Equal Protection Clause of the Constitution, which guarantees equal treatment under the law, was violated by the state’s refusal to reimburse local school boards for educating undocumented children or by allowing school districts to charge tuition to those families.¹

Undocumented children of Mexican descent filed a case in the Eastern District of Texas seeking injunctive and declarative relief. They asked the court to stop the Tyler Independent School District from excluding undocumented children from public schools pursuant to (1) a Texas statute and (2) a school district policy (hereafter collectively referred to as the “Texas’ actions”).

- ▶ The Texas Legislature revised its education laws to include a statute withholding from local school districts any state funds for educating children not “legally admitted” to the country and allowed school districts to deny their enrollment (Tex. Edu. Code. Ann. section 21.031).
- ▶ The school district policy implementing the Texas statute.

The U.S. Supreme Court Ruling

The U.S. Supreme Court found that Texas’ actions violate the Equal Protection Clause of the 14th Amendment. The U.S. Supreme Court held that all children, regardless of immigration status have constitutionally protected access to a free public K-12 education.

¹ 457 U.S. 215-216

Additionally, *Plyler* held that states cannot withhold funding for the education of undocumented students or deny enrollment of students based on their or their parents/guardians immigration status.

Analysis and Findings by the U.S. Supreme Court

The U.S. Supreme Court reached this conclusion after finding that:

1. **Undocumented children could bring a claim under the Equal Protection Clause providing that no state shall deny to any person the benefit of jurisdiction in the equal protection of the laws.** Undocumented children are both persons and within the territorial jurisdiction of the state.
2. **Texas' actions were not rationally related to a substantial state interest.** The record did not show a substantial state interest justifying the denial of "a discrete group of innocent children the free public education that it offers to other children residing within its borders." ² SCOTUS acknowledged that public education is unlike other government benefits in that education plays "a pivotal role in maintaining the fabric of our society and in sustaining our political and cultural heritage: the deprivation of education takes an inestimable toll on the social economic, intellectual, and psychological well-being of the individual, and poses an obstacle to individual achievement." ³
3. **A child's immigration status alone does not create a rational basis to deny them benefits.** The U.S. Supreme Court notes that children had no control over their immigration status. Furthermore, a state cannot know if an undocumented child will in fact be deported and the child may be granted permission to stay or even become a citizen one day.
4. **There is no national policy justifying the state denying these children a K-12 education.**
5. **There was no finding that Texas' actions would help meet its stated objective of preserving its limited resources.** The record did not show that the exclusion of undocumented children is likely to improve the overall quality of education nor that charging school tuition would reduce unlawful immigration (no basis to say that they're less likely to stay in the U.S. if charged tuition since the main motivating factor to enter the U.S. is the availability of employment). The U.S. Supreme Court found that "...whatever savings might be achieved by denying these children an education, they are wholly insubstantial in light of the costs involved to these children, the State, and the Nation."

² 457 U.S. 230

³ 457 U.S. 203