

MARCH 2, 2026 / IMMIGRATION RESEARCH INITIATIVE

# The Unforeseen Fiscal Cost of Verifying Student Immigration Status

Two bills currently before the Tennessee legislature would restrict the access of many immigrant children to K-12 education. Both bills have significant moral and human costs. Both face legal and constitutional hurdles. And both challenge the notion that all Tennessee children should have access to free public education from kindergarten through high school.

In addition to moral and human considerations, however, there are also administrative costs to each school district that have been brushed aside but that will not be trivial. Requiring that all students prove their citizenship or immigration status requires parents to assemble and show birth certificates, passports, green cards, or other documents that can prove a child's status. It would require school officials to be trained in how to evaluate this wide range of documents.

This state legislation would also create administrative costs for each local school district that have not been openly foreseen. [HB 1711/SB 2108](#) and [HB 793/SB 836](#) both would require students to “show their papers.” Both would have a powerful chilling effect that would result in many immigrant children missing out on a basic education. The bills would also create a significant hurdle for many children who are not immigrants, but whose parents may not have the necessary documents at hand.

The legislation would require local districts to gather, evaluate, and store citizenship and immigration records for very large numbers of children. H.B. 1711/SB 2108 would require school officials to evaluate the citizenship or immigration status of *all* 963,000 students in the Tennessee school system upon going into effect. [HB 793/SB 836](#) would require doing so for all *enrolling* students, which presumably would mean those newly in a school.

**IRI estimates that verifying the status of *all students* in the state would entail hiring, training and equipping 934 school personnel. For context, that is roughly half the number of school nurses in Tennessee public schools.<sup>1</sup> IRI estimates that the cost of hiring these 934 employees would total roughly \$55 million statewide.**

The cost of evaluating the status of only *newly enrolling students* would be lower. Verifying every 5-year-old coming to school for the first time the cost would cost roughly \$4 million statewide (1/13<sup>th</sup> of the total), and the cost of including all newly enrolling students could well be double or triple that amount, since students move into and out of districts at every grade level.

---

<sup>1</sup> [Annual School Health Services Report](#), 2023-2024 School Year, Tennessee Department of Education. Figure 2 shows 1,852 full-time equivalent (FTE) nurses working in Tennessee public school districts.

Calculated here are the costs for the first year of potential implementation. These are not one-time costs. The expense for each district would be highest in the first year of implementation but would continue to recur every school year.

Finally, there are also very significant long-term costs to the Tennessee economy if significant numbers of children are kept out of school. This analysis focuses just on the narrow question of administrative costs for the bills, not on the overall economic consequences for the state.

## Administrative Costs to School Districts Across Tennessee

In the 2024-2025 school year, there were 969,000 students in the state's public school system.<sup>2</sup> These students are spread out across 149 school districts, ranging in size from 106,000 students in Memphis-Shelby County Schools to fewer than 200 students in Richard City.

To evaluate the status of all students in the state would require the school system to establish an accurate accounting of the immigration status for all 969,000 students in Tennessee's public school system. Evaluating the status of only newly enrolling students would still be a significant burden. Either approach is a remarkably large and complex task that requires millions of taxpayer dollars that could be used for other much-needed purposes.

The burden will not fall only on immigrants. Many students who were born in the United States may not have documents verifying their citizenship status. Among those most likely to have difficulty locating documents are students born outside of hospitals, unhoused students, survivors of domestic violence or natural disasters, and students whose families have very low incomes. A report from the Center for Law and Social Policy (CLASP) suggests that a substantial number of students in Tennessee might fall into one or more of these categories. For instance, 31 percent of Tennessee students were found to be economically disadvantaged, a number that includes students who are homeless, runaways, or part of the foster care system.<sup>3</sup> In a related analysis looking at adults, the Brennan Center for Justice found that 21 million citizens of voting age nationwide do not have ready access to papers that prove their citizenship.<sup>4</sup> Children and their parents can be expected to have as much of a hard time finding appropriate documentation as voting-age adults.

---

<sup>2</sup> From Tennessee Public School data available online at <https://www.tn.gov/education/districts/federal-programs-and-oversight/data/data-downloads.html>

<sup>3</sup> "Adverse Consequences of Increased Administrative Burden on All K-12 Students," Center for Law and Social Policy, March 10, 2025.

<sup>4</sup> Kevin Morris and Cora Henry, Millions of Americans Don't Have Documents Proving Their Citizenship Readily Available, Brennan Center for Justice, June 11, 2024.

---

**STATEWIDE ESTIMATE FOR VERIFYING STATUS OF ALL STUDENTS, AND JUST INCOMING 5-YEAR OLDS**

Cost for Verifying All Students

Payroll	\$51,344,000
Equipment and Materials	\$2,100,000
Training	\$1,867,000
<b>Total First Year Costs</b>	<b>\$55,311,000</b>

Cost for Verifying Just Incoming 5-Year Olds

Payroll	\$3,949,538
Equipment and Materials	\$96,750
Training	\$86,000
<b>Total First Year Costs</b>	<b>\$4,132,288</b>

**Fig 1.** A low-end estimate of the cost of verifying status of newly enrolling students is obtained by dividing the total of all students by 13 to get a rough estimate of the number of kindergarten students each year. There are also students who move into (and out of) the district in all grades, so this can be considered a low figure and the number of enrolling students might well be two or three times this number.

An analysis of Metro Nashville Public Schools in 2025<sup>5</sup> estimated that it would take 77 full-time employees one year to validate the 78,000 students in that district, making each employee responsible for 1,038 students. Scaling that out across the whole state, IRI calculates that it would take 934 full-time employees to validate the immigration status of every single student in Tennessee public schools over the course of a full calendar year. That is, the state would have to recruit, equip, train, and pay 934 people to evaluate 1,038 students each to cover the 969,000 students in Tennessee schools.

To consider the cost, IRI’s estimate follows the Nashville example and considers an average wage of \$44,000 per year and total personnel cost (including taxes and benefits) of \$55,000, resulting in \$51 million in payroll costs. Each of these new employees would have to be equipped with desks, computers, software licenses and other materials, which estimated at \$2,250 per employee. There would also be training required, which is estimated at \$2,000 per employee. Equipment and training for 934 new employees is estimated to come to \$2.1 million for supplies and \$1.9 million in training costs.

All told, IRI estimates that evaluating the status of all students in the state would cost Tennessee taxpayers roughly \$55 million in its first year alone.

Evaluating the status of *newly enrolling* students would require setting up many of the same processes for training and hiring, but the number of students being evaluated would be smaller. We do not have a good basis for estimating how many children are new to the schools each year, but we can assume it is at a bare minimum the number of new kindergarten students. As noted above, verifying every 5-year-old coming to school for the first time would be roughly \$4 million, and the number of new students, and therefore the

---

<sup>5</sup> IRI’s cost analysis is based on an internal study conducted by Metro Nashville Public Schools in 2025, which estimated the cost of verifying legal status for Nashville’s 78,000 public school students. The analysis estimated that each administrator could process 1,038 students per year. It assumed people would be hired at the starting wage for District Enrollment Assistants in the district of \$21.40 per hour or \$44,000 annually, and added roughly 30 percent for benefits and Social Security, Medicare, and unemployment insurance taxes, bringing the total cost per employee to about \$55,000.

cost, could be double or triple that amount when accounting for people newly moving into the schools at other grade levels. And, these are just the first-year costs. Recurring costs for evaluating incoming students would be roughly the same every year, and costs for evaluating *all* students would be lower after the first year.

Verifying status would be an untested new undertaking, so there are several variables that could make the cost higher or lower. The assumed salary of \$44,000 (and total personnel cost of \$55,000 including taxes and benefits) might be higher or lower in different districts. It is hard to know whether a single employee can process 1,038 students, and in what time period—again, the figure could be higher or lower. And, with HB 793/SB 836, it is not clear how many students would need to be enrolled each year and how many would already be processed. Additionally, IRI assumes here that districts can manage to hire staff readily on a part-time basis where needed, and we allocate training and equipment costs proportionately, though it may not be straightforward to find and train staff in this way.

**By David Dyssegaard Kallick and Anthony Capote.**

---

David Dyssegaard Kallick is director of Immigration Research Initiative.

Anthony Capote is senior data and policy analyst at Immigration Research Initiative.

**COST TO SCHOOL DISTRICTS ACROSS TENNESSEE (PART 1)**

School District	Number of Students in 2024-25 School Year	Employees Needed to Verify Immigration Status	Cost (Statewide and per District)
<b>Tennessee State Total</b>	<b>969,000</b>	<b>934</b>	<b>\$55,312,000</b>
Achievement School District	1,400	1	\$81,000
Alamo	500	1	\$30,000
Alcoa	2,200	2	\$125,000
Alvin C. York Agricultural Institute	500	-	\$28,000
Anderson County	5,800	6	\$329,000
Arlington	4,300	4	\$248,000
Athens	1,600	2	\$92,000
Bartlett	8,600	8	\$493,000
Bedford County	8,800	9	\$505,000
Bells	400	-	\$20,000
Benton County	2,100	2	\$118,000
Bledsoe County	1,500	1	\$84,000
Blount County	10,000	10	\$570,000
Bradford	600	1	\$34,000
Bradley County	9,900	10	\$565,000
Bristol	3,900	4	\$224,000
Campbell County	4,800	5	\$276,000
Cannon County	1,700	2	\$98,000
Carter County	4,200	4	\$239,000
Cheatham County	5,300	5	\$304,000
Chester County	2,700	3	\$156,000
Claiborne County	3,800	4	\$216,000
Clay County	1,000	1	\$56,000
Cleveland	5,700	5	\$325,000
Clinton	900	1	\$53,000
Cocke County	4,100	4	\$234,000
Coffee County	4,200	4	\$237,000
Collierville	9,100	9	\$521,000
Crockett County	1,900	2	\$109,000
Cumberland County	6,700	6	\$381,000
Dayton	800	1	\$47,000
Decatur County	1,400	1	\$81,000
DeKalb County	3,600	3	\$203,000
Department Of Children's Services Education Division	30	-	\$2,000
Dickson County	7,600	7	\$431,000
Dyer County	3,400	3	\$196,000
Dyersburg	2,400	2	\$139,000
Elizabethton	2,600	2	\$147,000
Etowah	300	-	\$18,000
Fayette County Public Schools	2,700	3	\$154,000
Fayetteville	1,000	1	\$58,000
Fentress County	2,100	2	\$118,000
Franklin County	4,700	5	\$271,000
Franklin SSD	3,000	3	\$173,000
Germantown	Less than 100 students	6	\$339,000
Gibson Co Sp Dist	3,700	4	\$212,000
Giles County	3,500	3	\$198,000
Grainger County	2,800	3	\$162,000
Greene County	5,700	6	\$327,000
Greeneville	2,900	3	\$163,000
Grundy County	1,600	2	\$92,000
Hamblen County	10,000	10	\$569,000
Hamilton County	44,900	43	\$2,560,000
Hancock County	800	1	\$48,000
Hardeman County Schools	3,000	3	\$169,000
Hardin County	3,200	3	\$180,000
Hawkins County	5,900	6	\$338,000
Haywood County	2,300	2	\$129,000
Henderson County	3,700	4	\$213,000
Henry County	2,800	3	\$161,000
Hickman County	2,900	3	\$165,000
Hollow Rock - Bruceton	600	1	\$34,000
Houston County	1,200	1	\$68,000
Humboldt City Schools	1,000	1	\$56,000
Humphreys County	2,500	2	\$145,000
Huntingdon Special School District	1,300	1	\$72,000
Jackson County	1,300	1	\$75,000
Jefferson County	6,700	6	\$384,000
Johnson City	7,600	7	\$435,000
Johnson County	4,800	5	\$275,000
Kingsport	7,400	7	\$422,000
Knox County	58,300	56	\$3,329,000

Fig 2a. Numbers are independently rounded and columns may not sum to total. Costs might be higher or lower in individual districts; see text for details. Costs related to verifying only newly enrolling students rather than all students would be lower, though not necessarily proportionately lower.

**COST ESTIMATE BY SCHOOL DISTRICT FOR DOCUMENT VERIFICATION OF ALL STUDENTS (PART 2)**

School District	Number of Students in 2024-25 School Year	Employees Needed to Verify Immigration Status	Cost (Statewide and per District)
<b>Tennessee State Total</b>	<b>969,000</b>	<b>934</b>	<b>\$55,312,000</b>
Lake County	700	1	\$40,000
Lakeland	2,500	2	\$141,000
Lauderdale County	3,100	3	\$177,000
Lawrence County	6,600	6	\$377,000
Lebanon	4,400	4	\$251,000
Lenoir City	2,600	2	\$147,000
Lewis County	3,700	4	\$208,000
Lexington	800	1	\$48,000
Lincoln County	3,700	4	\$213,000
Loudon County	4,900	5	\$277,000
Macon County	4,100	4	\$235,000
Madison County	12,300	12	\$702,000
Manchester	1,500	1	\$87,000
Marion County	3,700	4	\$211,000
Marshall County	5,300	5	\$300,000
Maryville	5,600	5	\$321,000
Maury County	12,800	12	\$728,000
McKenzie	1,200	1	\$70,000
McMinn County	4,800	5	\$275,000
McNairy County	3,600	3	\$204,000
Meigs County	1,700	2	\$97,000
Memphis-Shelby County Schools	105,900	102	\$6,042,000
Metro Nashville Public Schools	78,000	75	\$4,455,000
Milan	1,900	2	\$110,000
Millington Municipal Schools	2,500	2	\$140,000
Monroe County	4,900	5	\$280,000
Montgomery County	38,600	37	\$2,206,000
Moore County	800	1	\$48,000
Morgan County	2,700	3	\$154,000
Murfreesboro	8,900	9	\$510,000
Newport	700	1	\$39,000
Oak Ridge	4,900	5	\$277,000
Obion County	2,800	3	\$162,000
Oneida	1,300	1	\$75,000
Overton County	2,800	3	\$160,000
Paris	1,500	1	\$83,000
Perry County	1,000	1	\$60,000
Pickett County	600	1	\$33,000
Polk County	2,100	2	\$118,000
Putnam County	11,300	11	\$644,000
Rhea County	3,800	4	\$217,000
Richard City	200	-	\$10,000
Roane County	6,000	6	\$342,000
Robertson County	10,900	11	\$624,000
Rogersville	600	1	\$36,000
Rutherford County	51,300	49	\$2,929,000
Scott County	2,300	2	\$131,000
Sequatchie County	1,900	2	\$107,000
Sevier County	14,000	14	\$802,000
Smith County	2,900	3	\$167,000
South Carroll	300	-	\$18,000
Stewart County	1,900	2	\$107,000
Sullivan County	7,700	7	\$438,000
Sumner County	30,200	29	\$1,726,000
Sweetwater	1,500	1	\$83,000
Tennessee Public Charter School Commission	6,800	7	\$387,000
Tennessee School for Blind	100	-	\$6,000
Tennessee Schools for the Deaf	Less than 100 students	-	\$7,000
Tipton County	9,600	9	\$546,000
Trenton	1,300	1	\$73,000
Trousdale County	1,400	1	\$78,000
Tullahoma	3,500	3	\$200,000
Unicoi County	1,900	2	\$111,000
Union City	1,500	1	\$86,000
Union County	5,400	5	\$308,000
University Schools	1,000	1	\$55,000
Van Buren County	700	1	\$40,000
Warren County	6,000	6	\$344,000
Washington County	7,800	8	\$447,000
Wayne County	1,900	2	\$110,000
Weakley County	3,900	4	\$220,000
West Carroll Sp Dist	700	1	\$39,000
West Tennessee School for the Deaf	-	-	\$1,000
White County	3,600	3	\$203,000
Williamson County	41,000	39	\$2,340,000
Wilson County	20,400	20	\$1,165,000

**Fig 2b.** Numbers are independently rounded and columns may not sum to total. Costs might be higher or lower in individual districts; see text for details. Costs related to verifying only newly enrolling students rather than all students would be lower, though not necessarily proportionately lower.