June 30, 2022

Acquisitions and Bibliographic Access Directorate

Dear Jennifer:

Thank you for your June 1<sup>-</sup>letter regarding the Library of Congress's decision on Illegal aliens as a *Library of Congress Subject Heading* term. As you know, the process in revising the heading has a long and somewhat tortured history.

In 2014 and again in 2016, the subject headings of *Aliens* and *Illegal aliens* were proposed for change to support improved access points for library materials on these topics. These proposed changes came through the normal LCSH change request process. After analyzing the requests, as well as going to extraordinary additional lengths such as a community survey, the Library was poised to create new subject headings to update these terms. *Aliens* was to be revised to "Noncitizens," and two headings were to cover the concept *Illegal aliens* —"Noncitizens" and "Illegal immigration."

In 2017, Congress directed the Library to put on hold the proposed changes until the Library took certain steps. The Library was to make publicly available its process for changing or adding subject headings "that is clearly defined, transparent, and allows input from stakeholders including those in the congressional community." Additionally, the process should "consider appropriate sources of common terminology used to refer to a concept, including current statutory language and other legal reference sources; and other sources, such as reference materials; websites; and, titles in the Library of Congress' collection." We took those steps.

Because we had provided for open discussion and gone through the normal vetting process that occurs during our monthly tentative list reviews during these years, we did not open up the process to another such vetting process. We determined to proceed with the decisions that we had reached prior to Congress's mandating us to hold off until we had a clear process in place to accept external views on subject terminology. As you are well aware, no decision that we make satisfies all our constituencies, both within the Library and within the broader library community.

In 2017, the Library met the requirement to make its process publicly available to stakeholders, including the congressional community. (See <a href="https://www.loc.gov/aba/cataloging/subject/lcsh-process.html">https://www.loc.gov/aba/cataloging/subject/lcsh-process.html</a>). Over subsequent years, the Library consulted with congressional committees (the latest on August 6, 2021), as requested, and completed multiple reviews of sources of common terms in support of creating the new subject headings, including legal sources (as mandated by Congress), other sources, websites, and the Library of Congress collections.

In response to why the Library diverged from "Unauthorized immigration" to "Illegal immigration," I note that our policy specialists did repeated research in the sources cited above using the phrases "illegal immigration," "unauthorized immigration," and "undocumented immigration." The results

were conclusive: the most commonly used phrase across the sources was "illegal immigration." The proposal <i>Unauthorized immigration</i> was therefore replaced with <i>Illegal immigration</i> .
Again, thank you for your letter; hopefully, I have responded.
Sincerely,
Beacher Wiggins, Director