

January 20, 2023

Dear Beacher,

Thank you for your June 30, 2022 letter. We appreciate the complex challenges involved with revisions to these headings; however, we also believe additional information about how LC made decisions about these revisions is crucial for libraries to make choices in their own local catalogs. With that in mind, the following two consequential questions still require a response."

Why did LC decide to use "Illegal immigration" and not "Unauthorized immigration," as it announced it would in March of 2016?

Your June 2022 letter states that the results of your research demonstrated that “the most commonly used phrase across the sources was ‘illegal immigration.’” In the context of a subject heading that is being changed specifically because formerly widely-accepted terminology has recently come to be viewed as pejorative, it does not make sense for frequency of use to be the exclusive or even the primary criterion. Avoiding prejudicial language is clearly a factor that should be given high priority.

The use of the word "illegal," whether it has been a commonly used phrase or not, contributes to the criminalization of undocumented immigrants. As the SAC Working Group on the LCSH “Illegal aliens” stated in its [July 2016 report](#), the use of the word “illegal” denies due process, inappropriately declaring the outcome of immigration status before it has been ruled upon. As of today, there are multiple examples in LC’s catalog where catalogers have inappropriately judged the legality of actions described or depicted within resources. For example, the 2017 novel [Dream of another America](#) has the summary “A Salvadoran father attempts the perilous journey to America while his wife and son stay behind in El Salvador to await his return.” There is no indication in the publisher’s description that indicates that the action of the character has been judged illegal, yet this heading has been given the LCSH “Illegal immigration--United States--Fiction.”

Why did LC reject "Undocumented immigrants" as the replacement subject heading for "Illegal aliens"?

The details shared by LC have not significantly or adequately addressed this question, and the challenges involved with implementing the split of “Illegal aliens” into two headings call into question the rejection of this solution.

LC’s [March 22, 2016 announcement](#) explained why “undocumented” was not chosen:

The rationale was twofold. First, while undocumented immigrants is often used as a synonym for illegal aliens, the phrases are not synonymous. Not all “undocumented” people are, or intend to be, immigrants, and many of them do in fact have documents of some type. Second, the authoritative sources for legal terminology that are generally referenced by PSD when establishing or revising headings, including Black’s Law

Dictionary, use illegal aliens as their established term. Since Dartmouth's proposed terminology was problematic, PSD chose to retain the established heading and to study the situation further.

The argument that the LCSH replacement term can't refer to immigrants because not all "illegal aliens" are immigrants no longer stands, given that LC has replaced it with "Illegal immigration."

The notion that "undocumented" is commonly taken to mean literally without any documents is easily disproven. As explained by the SAC Working Group on the LCSH "Illegal aliens" in the "Definitions of 'undocumented'" section of its [July 2016 report](#):

In current usage, it is most common for "undocumented" to refer to foreign-born persons residing in a country without the legal authorization required by that country. For example, the ERIC Thesaurus defines "Undocumented Immigrants," which it uses as a preferred term, as "Persons residing in a foreign country without proper authorization, having entered that country by unlawful means or having violated the provisions of their visas." The National Library of Medicine's Medical Subject Headings (MeSH), which also uses "Undocumented immigrants" as a preferred term, defines it as "Foreign nationals residing in a country without legal immigration status, or in violation of the immigration laws of that country."

LC did not respond to the SAC report or provide any further clarification on why "Undocumented immigrants" was rejected, but the 2016 LC rationale for why "undocumented" was unacceptable seems to be irrelevant or inconsistent with LC's later decisions.

While LC representatives have stated that survey results were analyzed and that policy specialists did repeated research, in the absence of information about what they found, libraries are still left without the information they need to proceed with decisions about their own local catalogs. We urge LC to consider sharing information about the decision-making process it followed to revise these headings. Furthermore, we urge LC to recognize that using the phrase "Illegal immigration" is not in keeping with H 204's guidance to use "unbiased" terminology.

Thank you,
Adolfo R. Tarango
Chair, PCC Diversity, Equity, and Inclusion Advisory Committee
Cataloging & Metadata Librarian
University of British Columbia Library