

Rational Basis and the Legitimate Interests of the State

Name of Student

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5-1 Rational Basis and the Legitimate Interests of the State

The rational basis test is the most lenient form of judicial review used by courts to evaluate laws that affect constitutional rights. The test is applied when neither a fundamental right nor a protected class is involved. It requires that a law be rationally related to a legitimate government interest. The test's application is explored in three landmark cases: *Plyler v. Doe*, *City of Cleburne v. Cleburne Living Center, Inc.*, and *Kadrmas v. Dickinson Public Schools*.

Rational Basis Review in Supreme Court Cases

***Plyler v. Doe*, 457 U.S. 202**

In *Plyler v. Doe*, the Supreme Court struck down a Texas statute that denied funding for education to children who were illegal immigrants. The Court used a more exacting version of the rational basis test because it dealt with vulnerable individuals—children—whose status as illegal immigrants was not of their own making (*Plyler v. Doe*, 1982). The Court concluded that denying these children an education would not logically further the state's interest in limiting illegal immigration or reducing costs, as the long-term costs of undereducating these children would far outweigh the savings made by the statute.

***City of Cleburne v. Cleburne Living Center, Inc.*, 473 U.S. 432**

The case involved a city ordinance that required a particular use permit for the operation of a group home for mentally disabled individuals. The Supreme Court applied the rational basis test but with a more scrutinizing approach, often referred to as "rational basis with bite." The Court found that the city's justifications for requiring a special permit from this group home. In contrast, other similar group homes for different categories of inhabitants did not need one and were not a legitimate interest (*City of Cleburne v. Cleburne Living*

Center, 1985). The Court noted that irrational prejudice against the mentally disabled could not justify disparate treatment under the guise of a zoning ordinance.

Kadrmas v. Dickinson Public Schools, 487 US 450

In *Kadrmas*, the Court upheld a North Dakota statute that allowed school districts to charge fees for transportation to school. The decision was based on a standard rational basis review. The Court found that the fee system was rationally related to the state's interest in education and maintaining school budgets (*Kadrmas v. Dickinson Public Schools*, 1988). Unlike *Plyler*, where children's access to education was outright denied, *Kadrmas* did not involve an outright denial but rather a condition that could potentially make access to education more difficult for some.

Analysis of Rational Basis Application and Government Interests

City of Cleburne

The local government's interests, purportedly based on community concerns about the "suitability" of the mentally disabled for the neighborhood, were deemed not rationally related to the discriminatory zoning practice. The Court discerned that these concerns were rooted more in irrational prejudice than in any legitimate municipal planning objective.

Plyler v. Doe

The Court did not defer to Texas's interest in discouraging illegal immigration because the means chosen—denying education to children—was not appropriately related to the objective. The Court emphasized that the statute imposed a lifetime hardship on a discrete class of children not accountable for their illegal status, suggesting that the state's purported interest in fiscal savings and discouraging immigration was not advanced rationally by the law.

Kadrmas v. Dickinson Public Schools

The outcome differed from Plyler because the law did not outright deny a fundamental right but imposed a fee that, while potentially burdensome, did not preclude access to public education. The Court perceived this as a permissible local decision on resource allocation, not an unreasonable or wholly restrictive measure.

Efficacy of the Rational Basis Test

The rational basis test, while effective in allowing a broad exercise of governmental power, sometimes falls short in protecting individuals against laws that marginally advance a legitimate government interest. In the cases discussed, the test's flexibility helped protect vulnerable populations in Plyler and Cleburne. However, in Kadrmas, it allowed for a policy that could hinder access to education for less affluent children.

Personal Agreement with Case Holdings

I agree with the holdings in Plyler and Cleburne because both decisions appropriately scrutinized weak governmental interests that threatened to enforce prejudiced or economically punitive measures against vulnerable populations. However, I have reservations about Kadrmas, where the decision might be seen as underestimating the practical impact of the transportation fee on poorer families, potentially restricting their children's access to education.

References

City of Cleburne, Texas, et al., Petitioners v. Cleburne Living Center et al. (1985). LII / Legal Information Institute. <https://www.law.cornell.edu/supremecourt/text/473/432>

James Plyler, Superintendent of the Tyler Independent School District and Its Board of Trustees et al., Appellants, v. J. and R. Doe et al. Texas, et al., Appellants, v. Certain named and unnamed undocumented alien children et al. (1982). LII / Legal Information Institute. <https://www.law.cornell.edu/supremecourt/text/457/202>

Paula Kadrmas, et al., Appellants v. Dickinson Public Schools et al. (1988). LII / Legal Information Institute. <https://www.law.cornell.edu/supremecourt/text/487/450>