

Allocation, Inequity, and Accountability – A Social Justice Analysis of Federal School Improvement Policy

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Abstract

This study examines how state education agencies (SEAs) make funding decisions to support schools identified for comprehensive support and improvement under section 1003a of the Every Student Succeeds Act (ESSA). Despite the federal mandate that states reserve and strategically deploy Title I Part A funds for school improvement, little is known about the mechanisms through which SEAs translate that mandate into practice. Drawing on semi-structured interviews with ten SEA administrators across geographically and demographically diverse states, supplemented by document analysis of publicly available policy materials from California and New York, this study investigates two research questions: how SEAs determine funding levels for school improvement, and what criteria they apply when reviewing district applications. Thematic analysis of the data revealed four interconnected findings: 1) SEAs rely predominantly on enrollment-based and flat base allocation formulas that are structurally indifferent to school level need; 2) several states lack coherent or documented funding processes altogether; 3) funding decisions in multiple states are anchored to historical practices – including prior-year carryover – rather than differentiated need assessments; and 4) application review processes, even when formally elaborate, function as compliance mechanisms rather than instruments for equity-intentional resource distribution. The findings carry implications for federal oversight of Section 1003a, state-level SEA capacity investment, and the redesign of application processes as instruments of needs-based, funding determination.

Keywords: *School Improvement, K-12 education Policy, Resource Allocation, Education Policy, Critical Education Policy, Title I, and Critical Race Theory*

Introduction

The enactment of the Every Student Succeeds Act (ESSA) provided states with greater authority and autonomy when making decisions around several areas including school improvement. Through the ESSA law, states continue to be responsible for improving schools, as they are required to reserve 95% of the funds allocated by the U.S. Department of Education for school improvement (Elementary and Secondary Education Act, 2015). Despite this requirement, “precious little information” (Brown et al., 2011, p. 11) is available on the way state educational agencies (SEAs) help schools and districts to improve. These gaps in knowledge persist despite the US education system putting states in the “driver’s seat” (Brown & Benner, 2017) for improving their schools and districts. Furthermore, Brown et al. (2011) found that although state agencies spend millions, and in some cases, even billions of dollars of public funds every year, it is difficult to find basic information on the way agencies spend the money and the way they function, given that their websites are often difficult to navigate, and they rarely publish detailed information on SEA operations. The opacity is not incidental – it reflects an institutional condition in which the public resources are distributed to the nation’s most underserved schools have been shielded from the kind of critical scrutiny that equity-intentional policymaking requires.

In response to the gaps in knowledge about spending by state agencies, this study aims to better understand the mechanisms that SEAs follow while making funding decisions for school improvement. This study does not treat those mechanisms as neutral administrative procedures; rather it examines them as institutional expressions of power that either advance or foreclose educational

opportunity for the students most harmed by historically inequitable funding systems. Furthermore, improving standards of underperforming schools and districts is a relatively recent role and involves a set of responsibilities for SEAs (Ziebarth & Hassel, 2005). This study investigates those mechanisms not simply to describe them but to evaluate whether they are adequate to the equity demands that the populations served by ESSA's school improvement provisions have long been owed.

Purpose

The purpose of this study is to examine how state education agencies make funding decisions to support schools identified for comprehensive and targeted improvement under Section 1003a of the Every Student Succeeds Act. This paper centers around understanding the funding processes across state education agencies as they make decisions to support school improvement. While ESSA represented a significant federal commitment to improving the nation's most underserved schools, the mechanisms through which their commitment translates into actual resource distribution at the state level remain poorly understood. As such, this study addresses that gap directly, treating SEA funding processes not as neutral administrative procedures but as policy acts with racially and economically consequential distributional outcomes.

The need for this examination is grounded in well documented and persistent reality. Despite decades of federal school improvement legislation, poor and minoritized students remain concentrated in the least well-funded schools in the country – schools that are disproportionately located in central cities and rural areas and funded at levels substantially below those of neighboring suburban districts (Darling-Hammond, 2000; Baker, 2018). These disparities operate not only across district lines but within them. Federal school improvement funds, including those reserved under Section 1003a, are positioned rhetorically as a

corrective to these inequities. This study investigates whether the processes SEAs use to distribute those funds are designed to function that way in practice.

To do so, this study takes seriously the distinction between formal equality and substantive equity. As critical policy analysis scholarship demonstrates, policies that appear procedurally neutral can reproduce conditions of inequity when they are implemented through institutional structures shaped by historical and racial logics that predate the policy itself (Ball, 1994; Diem et. al. 2014). This study is therefore motivated by both an empirical and a normative concern. The empirical concern is descriptive and analytical: what processes do SEAs actually use to make funding decisions, and what do those processes reveal about the relationship between stated federal intent and institutional practice? The normative concern is equity centered: are the funding processes that SEAs have developed adequate to improve the schools they are designed to serve? By analyzing the mechanisms SEAs employ – and the equity implications of those mechanisms – this study contributes to the school finance equity literature, to the growing body of critical policy scholarship on ESSA implementation, and to the practical work of redesigning institutional processes so that federal school improvement resources reach the students they were intended to serve.

Research Context: Strategic Resource Allocation

This study focuses on fund allocation processes under Section 1003a of the ESSA. The primary source of federal aid for elementary and secondary education is Title I-A of the ESEA, which authorizes federal aid for the education of disadvantaged students. Under Title I-A, the ESEA, amended by the ESSA, continues to hold public school systems and individual public schools accountable by SEAs for monitoring and improving achievement outcomes for students and narrowing achievement gaps, sustaining a focus initiated by amendments to the ESEA made by the No Child Left Behind Act of 2001 (NCLB P.L., p. 107-

110). Under Section 1003a of the ESSA, SEAs must reserve 7% of the amount that the state receives under Subpart 2 of Part A, and of those reserved funds, 95% must be used to grant local educational agencies, so that they may provide comprehensive or targeted support to improvement activities (Every Student Succeeds Act, 2015). This study contributes to the debate on school funding by analyzing the way decisions are made to allocate funds and improve standards of schools serving students in poverty. Funding for underperforming schools creates a shorter social mobility ladder for students in poor neighborhoods (Condrón, 2011; Marks et al., 2006). Experts have recognized that the way schools spend their money is as important as the amount of money they must spend (e.g. Hanushek, 1996). A holistic strategy to organize resources in schools and share leadership among stakeholders, including schools, students, families, and community-based organizations, appears critical (Johnston et al., 2020). Reforms accompanied by resources may enable schools to use their discretion to implement those. Furthermore, by analyzing the data for this study, I discuss lessons for practitioners (teachers, principals and superintendents) who do not intend to treat all schools and students in the same way.

Literature Review

The Role of SEAs

There is little information on the role of SEAs before 1965, when the landmark ESEA dramatically boosted federal involvement in kindergarten through 12th grade education, prompting a related shift in state capacity (Brown et. al, 2011). Yet the conditions that necessitated the ESEA were not politically neutral. The call for federal involvement was rooted in the Civil Rights Movement and decades of documented state sanctioned disinvestment in schools serving Black and Brown communities – a history that would continue to shape SEA institutional culture long after the legislation passed (Orfield, 2001; Black, 2020). In general,

SEAs – often referred to as Departments of Education or Public Instruction – are responsible for enforcing state and federal education laws, dispensing state and federal resources, and providing guidance to public districts and schools (Brown et al., 2011). However, as Weiss and McGuinn (2017) document, SEAs were not built for the equity mandate the ESEA implied. The federal government assigned SEAs with the responsibility to monitor the use of ESEA funds, and as Kober and Rentner (2012) observe, this compliance function came to define SEA identity. What is less often noted is that this compliance orientation emerged as precisely the same historical moment as white flight and the accelerating fiscal abandonment of urban schools – meaning that the bureaucratic habits SEAs developed in this era were formed in a landscape already deeply stratified by race and class (Orfield, 2001). The Civil Rights Movement and passage of the ESEA helped foster an effective schools movement that endeavored to identify the practices of high-performing schools (Smith & O’Day, 1990), but that movement largely centered on school level behaviors while leaving intact the funding structures that constrained what schools in poor communities could do.

Decades after the Civil Rights Movement, the role of SEAs continued to evolve with passing legislation. States crafted an array of policies during the 1970s and 1980s to assess and improve school and district performance (Benveniste, 1985), and the passage of Title V of the ESEA strengthened SEA administration of federal funds through the creation of set-asides. As a consequence, SEAs spent much of their energy ensuring that dollars were spent and records were tracked in accordance with federal requirements (Brown et. al., 2011) – reinforcing the compliance posture rather than a capacity building one.

While Brown et al., (2011) characterized early SEAs as “tiny departments primarily designed to funnel money,” more recent scholarship document a contested expansion of the SEA role toward improvement capacity (Weiss &

McGinn, 2017; Weinstock et al., 2019). As such in recent times, SEAs are expected to do much more, such as articulating curriculum standards, developing school accountability systems, aligning federal and state funding sources and programs, and helping schools and districts to improve (Weinstock et al., 2019). The ESSA further increased state roles, as the law increased flexibility with what some states and their SEAs were already doing, such as differentiating support for underperforming schools and managing statewide school districts of underperforming schools (Welsh et al., 2019).

Resource Allocation Studies

Whether equitable access to educational resources affects academic achievement is a topic of ongoing debate yet the evidence base has grown considerably more specific in recent years. Under the ESSA guidelines, states are expected to use available resources effectively to protect historically marginalized and high-poverty populations. They must focus on ensuring equitable education and distribution of resources in areas of school improvement, academic performance, and resource allocation (Della Sala et al, 2016; Knight, 2017; Uzzell et al., 2024). Della Sala et al.'s (2016) study used structural equation modeling to test the effects of education resource accessibility on student learning and achievement. Findings of this study suggested that states did not typically allocate additional funds to schools by considering poverty levels and the socioeconomic characteristics of students attending such schools. Furthermore, inadequate funding for these diverse populations of students reduced their access to qualified and culturally competent teachers, resulting in poor academic achievement outcomes (Della Sala et al., 2016). More recently, Baker et. al, (2022) demonstrated that state funding formulas structurally disadvantage high poverty districts even when the formulas are nominally designed to be equitable; the formal appearance of neutrality in formula designed masks the substantive inequity of its distributional outcomes. This distinction – between formal equality and

substantive equity – is central to both the critical policy analysis and critical race theory frameworks that guide this study.

Scholarly frameworks for understanding resource allocation vary in their scope. Plecki et al. (2006) identified the three fundamental resources—money, human capital, and time—emphasizing that all resources and resource uses are linked and depend on others for intended outcomes. Pan et al. (2003) provided additional layers to the types of resources that drove allocation practices focusing on student learning, including money, staff, time, and additional resources, such as physical resources, parents, and the community. While both frameworks offer important conceptual grounding, they do not resolve the question of which resource type is most legible to and actionable by SEA policymakers operating under federal statute. This study focuses on fiscal resources because, as Baker (2017) argues the distribution of fiscal resources is the primary lever through which the quality of K-12 schooling is shaped at the system level – and because fiscal allocation decisions are the domain most directly governed by the Section 1003a provisions this study examines. Owings and Kaplan (2024) offer a useful bridge between these typologies through their equity audit framework, which positions fiscal resources distribution as both a technical question and moral one requiring explicit attention to race and class. This study adopts a similar posture: fiscal allocation is not merely a budgetary exercise but a policy act that either reproduces or disrupts existing patterns of educational stratification.

Despite this body of evidence fundamental questions remain about the mechanisms SEAs actually use when making funding decisions under Section 1003a. This study addresses two such questions:

- RQ1: How do you (SEA) determine funding for the purpose of improvement (based on the LEA application, primarily through Section 1003a)?
- RQ2: What do you look for in an application to determine the funding level?

Conceptual Framework

Critical policy analysis as methodology

Critical policy analysis refers to a form of education policy studies that exposing inconsistencies between what policy says and what policy does, particularly in the terms of power relationships in society (Diem, et al, 2014). CPA locates power in policymaking and challenges conditions of inequity embedded in those processes (Ball, 1994; Molla, 2021), and it examines how marginalized groups are produced and sustained through policy rather than protected by it (Cahill, 2015). Researchers who adopt a critical policy stance focus on uncovering and transforming conditions of inequity embedded in social and institutional life (Rogers, 2004), challenging assumption that privilege some while oppressing others (Willis, 2008).

For this study, CPA is operationalized through Ball's (1994) policy cycle framework, which distinguishes among the context of influence (where policy discourse is initiated and the elite interests shape the agenda, the context of policy text production (where legislation and formal guidance are written), and the context of practice (where policy is interpreted and enacted by practitioners). Applied to the present study, ESSA Section 1003a was shaped at the federal level in the context of influence, translated into state guidance in the context of text production, and then enacted – or resisted, or reinterpreted – by SEA staff in the context of practice. As such, this framework makes visible the multiple points at which technical sounding decisions about funding formulas and application criteria are actually political decisions with distributive consequences. The gap between what ESSAs school improvement provisions promise and what SEA funding process deliver is not simply a matter of bureaucratic inefficiency – it is the predicable result of policy processes that were never designed to

center the needs of communities most harmed by education inequality (DeLeon, 1988; Molla, 2021)

Critical Race Theory

This study is also grounded in Critical Race Theory or (CRT), a framework that examines how race and racism are embedded within legal systems, policies, and institutional structures (Delgado & Stefancic, 2017). CRT has been foundational to education research because it centers race as a structuring force in persistent educational disparities rather than as an incidental variable (Ladson-Billings & Tate, 1995; Ladson-Billings, 1998). Rather than applying CRT as a general orientation, this study draws on three specific tenets that are directly operative in the context of SEA resource allocation. First, the permanence of racism (Bell, 1975) grounds the analysis: the expectation that SEA funding process are racially neutral – that formula – based allocation, for example, is simply technical – ignores the historical record showing that funding structures in American public education have consistently produced racially stratified outcomes regardless of their formal design. Second, the tenet of interest convergence (Bell, 1980) explains why federal policy reforms like ESSA generate rhetorical commitments to equity without producing redistribution; equity gains for communities of color tend to advance only when they also serve the interests of dominant groups a logic that is legible in the flexibility ESSA grants states while leaving local property tax structures – and the racial tax structures – and the racial wealth gap they encode – entirely intact. Third CRT's critique of formal equality (Crenshaw et al, 1995) provides the sharpest analytical lens for this study: when SEAs apply the same formula or the same application rubric to all districts regardless of their histories of disinvestment, the appearance of neutral procedure masks profoundly unequal outcomes. Billings (2010) argues, citizenship and race interact in ways that determine whose education needs are treated as

urgent and whose are deferred – a dynamic that is visible in how SEA administrators describe and justify their funding decisions.

These CRT tenets are further sharpened by Banks' (2023) argument that public education systems operate under a racial capitalist logic – one in which state institutions systemically underfund Black and Brwon schools while extracting measurable value from those communities in the form of test scores, enrolment data, and compliance metrics for institutional proposes that primarily serve white institutional gains.

Methodology

Research Design

This study employs a qualitative research design to examine the processes through which state education agencies make funding decisions for school improvement under Section 1003a of the Every Student Succeeds Act. Qualitative inquiry is appropriate here because the central research questions concern the meaning SEA administrators make of their own decision-making processes – how they interpret federal statute, construct application criteria, and justify funding determinations - phenomena that are not reducible to numerical measurement (Willis, 2008). More specifically, this study draws on critical qualitative orientation, consistent with the CPA and CRT framework that guides the analysis. As Bogdan and Biklen (2007) argue, critical qualitative research does not treat participants' accounts as transparent windows onto reality but rather as data embedded in institutional, historical, and racial contexts that must be analyzed as part of the inquiry itself.

As such a cross-state comparative design was used to capture variation in how SEAs operationalize federal guidance. Rather than examining a single state policy while also surfacing meaning differences in how formula-based and

competitive allocation processes are implemented. This design is particularly well suited to policy research because federal law creates a shared statutory context.

Sampling and Participants

Participants were selected through purposive sampling, a strategy appropriate when the research goal is to access individuals with specific knowledge or institutional roles relevant to the study's questions (Saldana, 2013). The targeted population included state education agency staff with direct responsibility and oversight of the school improvement process for low-achieving school districts. Eligible participants included State Title I Directors, Directors of School Improvement, etc.)

Data Collection

The data was collected through two complementary sources semi structured interviews and publicly available state policy documents. Semi-structure interviews were conducted with each of the ten participants via Zoom and lasted approximately one hour. This format was chosen because it allowed the research to pursue consistent lines of inquiry across participants while preserving the flexibility to probe unexpected responses and follow emerging threads – a feature essential when participants' accounts vary considerably in depth and candor, as is common in policy research involving institutional actors (Willis, 2008).

The interview protocol centered on two questions directly tied to the study's research questions: how SEA administrators determine funding for school improvement purposes under Section 1003a, and what criteria they apply when reviewing district applications to determine funding levels. Follow up probes were used to elicit specificity around process, decision criteria, and contextual constraints.

The interview protocol was developed through a systematic process designed to ensure that the questions were both conceptually grounded in the study's theoretical framework and practically relevant to the institution's roles of the participants.

Questions were developed through an iterative process that began with a close reading of Section 1003a of ESSA and the federal guidance documents issued by the U.S. Department of Education governing school improvement funding. This statutory grounding was essential: because all ten participating states operate under the same federal requirements to reserve 7% of Title I Part A funds for school improvement, the protocol needed to be specific enough to access variation in how states implement that requirement while remaining open enough to surface unanticipated practices and constraints.

To compliment and contextualize the interview data, the researcher also reviewed publicly available documents from two of the country's largest state education agencies – California and New York – accessed through their respective agency's websites between February 2024 and June 2024. More than 25 documents were reviewed, including policy guidelines, district application templates, scoring rubrics, budget planning tools, and state legislative guidance for schools and districts identified as low performing.

Furthermore, document analysis served two functions: it provided independent verification of the processes participants described and it surfaced features of the formal policy architecture – application criteria, funding thresholds, scoring weights – that interview data alone could not capture. Together, these two data sources allowed for a fuller account of how funding decisions are shaped by both the written policy environment and the interpretive judgements of the administrators who implement it.

Data Analysis

Data analysis followed a thematic analysis approach as outlined by Braun and Clarke (2006), adapted to reflect the critical theoretical framework guiding this study. Thematic analysis is appropriate here because it provides a systematic, replicable method for identifying patterns across qualitative data while remaining flexible enough to accommodate theoretically-informed interpretation rather than purely inductive coding (Braune & Clarke, 2006).

Analysis proceeded in six phases. First, as the researcher I familiarized myself with the data through repeated reading of interview transcripts and document materials, noting initial observations and questions. Second, initial codes were generated systemically across the dataset using qualitative analysis software, with a codebook developed to ensure consistency in how patterns were identified and labeled (Saldana, 2013). Third and fourth, codes were grouped into candidate themes and then reviewed iteratively against the dataset to ensure that themes were coherent internally and meaningfully. Fifth, themes were defined and named with attention to both their descriptive content and their theoretical significance – that is, what each theme reveals about the relationship between SEA funding practice and the equity commitments embedded in federal law. Finally, themes were developed into findings that speak directly to the research questions and to the CPA/CRT framework. The analysis yielded three organizing categories: funding processes that were substantively in place, funding processes that were notably absent or inadequate, and funding processes that were constrained by historical and contextual limitations. These categories structure the findings section that follows.

Findings

The findings presented in this section are organized around two research questions guiding this study: (1) How do SEAs make funding decisions for the

purpose of school improvement under Section 1003a? and (2) What do SEAs look for in district application to determine funding levels? Data were drawn from semi-structured interviews with ten state education agency administrators and from document analysis of publicly available policy materials from California and New York. Analysis proceeded through an iterative thematic process in which initial codes were generated close to the language of participants – capturing terms like “carryover,” “base allocation,” “enrollment factor,” and “evidence-based lens” – and then grouped into clusters that revealed deeper patterns across states. As clusters were reviewed against the full dataset and the CPA/CRT framework, three themes emerged that cut across both research questions: outdated and enrollment-driven funding processes, the absence of coherent or equitable funding mechanisms in several states, and the persistence of historical practices that reproduce harm for schools serving students of color. A fourth theme, surfaced primarily through document analysis, concerns the gap between the formal rhetoric of application review processes and their actual function in funding determinations.

Importantly, the themes did not emerge as discrete categories but as analytically related dimensions of a single underlying problem: SEA funding decisions for school improvement are largely decoupled from the needs of schools and communities they are designed to serve. This interpretive conclusion – that the processes described by participants reflect institutional habit rather than equity – intentional design – is grounded in the CRT tenet of formal equality masking substantive inequity (Crenshaw et al., 2005) and in Ball’s (1994) observation that policy in the context of practice is always reinterpreted shaped by institutional history and organizational culture. The following themes elaborate that argument through the participants’ accounts.

Theme 1: Outdated and Enrollment-Driven Funding Processes

The most consistent pattern across participating states was the use of formula-based funding processes that allocated dollars primarily based on student enrollment figures or school size – criteria that are technically neutral but structurally indifferent to the depth or concentration of educational need in a given school or community. During the coding process, references to enrollment, school size, based allocations, and per-pupil expenditure were among the most frequent initial codes across the dataset. When these codes were grouped and examined together, what emerged was not simply a picture of formula variation, but a portrait of funding systems designed around administrative convenience rather than equity informed need assessment.

In reviewing the data, several states reported giving CSI schools a flat base allocation regardless of contextual factors. In an interview with State H in April the participant stated:

.... We give our CSI schools a base allocation of funding of \$100,000 each...in some instances, targeted support improvement (TSI) schools received lower amounts, but enrollment was still a factor.

This approach treats schools as fungible units rather than as institutions embedded in communities with distinct histories of disinvestment. As Baker et. al, (2022) demonstrate, flat base allocation applied uniformly across schools with vastly different resource contexts produce formally equal but substantively inequitable distributions – an outcome this study’s data consistently reflects.

Other funding decisions included an alternate method in the funding decision-making process that targeted prioritizing funding for smaller districts with a population below 20,000. The following excerpt from an interview with Kathy from State C emphasizes an additional layer centered on enrollment – driven

logic, with the participant describing a legislatively mandated alternate method for smaller districts:

...the process, there's an alternate method we use, legislatively for smaller districts with a census population under 20,000, so for our bigger districts,... which, we're a pretty rural state, there's a smaller amount for bigger districts, we're required by law to use census data to determine how much funds to give them from the Title pool we get.

While this process acknowledges demographic variation, it does so through direct assessment of educational need, poverty concentration, or the specific improvement requirements of identified school size or other characteristics

In another example, State I provided a base allocation set for a certain amount of funding. For example, in State I, certain schools receive \$100,000 per school. Jan from State I reported,

“...we would use an average amount that it provided to certain schools which take into account school size or other characteristics.” – language that gestures toward differentiation without specifying how race, poverty, or historical underinvestment factored into the formula's design.

Several states reported using competitive or in-place processes to make funding decisions. In these examples, the states focused on the criteria established to target the local education agency. For example, some states reported using a process to review district applications. The review showed that the grant application review process was aligned with the school improvement planning process, including budget, narrative, and a review of evidence-based pieces included in the application.

A more elaborated example came from State F, where the application review process was formally structured around evidence-based criteria as an excerpt from an interview with Jen from State F states:

.... So they (the district) do a school improvement plan and a school improvement application and of course, those grant applications everything has to align what's in the grant or what's in the budget, and what's in the narrative has to be aligned, there has to be the evidence-based pieces there...

Yet even here, the participant confirmed that award amounts were ultimately calculated on per-pupil expenditure based on school size – meaning the evidence-based review shaped the application's content but did not drive the funding determination itself. The application became a compliance ritual rather than a needs' assessment tools. This pattern – where procedural rigor in application design coexists with enrollment-based funding formulas – is among the most analytically significant findings in the dataset, because it reveals how the appearance of intentional process can mask the persistence of equity-indifferent practice.

State D represented the most structured approach among participating states, using an annual data review to identify key priorities and a guidance document organized into required and optimal funding categories for identified schools. A participant explained:

“...we then put all that into one application and then have two buckets that we call optional or required for a school system...In order to get an approved plan, they have to either met all of the required options or required elements of that set plan or present an alternate evidence-based option form that then is vetted and reviewed and approved by department personnel.

While this model reflects greater intentionality around improvement strategy, it remains structured around compliance with categorical requirements rather than a differentiated response to school level needs - and the funding amounts tied to compliance were not reported as calibrated to the severity or specificity of improvement challenges each school faced.

Theme 2: Absent or Incoherent Funding Processes

A second cluster of codes – including participants’ use of phrases like “we don’t have it in place yet,” “we couldn’t confirm the mechanism,” and “not necessarily based on what they need” – coalesced into a theme that is perhaps the most direct evidence of the structural problem this study examines. In several participating states, no coherent or documented funding process existed for allocating school improvement dollars under Section 1003a. The absence of process is not a neutral finding. Read through a CRT lens, it reflects the permanence of institutional neglect toward schools and communities that have historically been under-resourced – the same schools ESSA’s school improvement provisions were designed to support.

A participant from State E acknowledged the gap directly: Mark from State E stated the following during an interview.

...so we don’t have it in place yet, like I said, but it is something that we’ve been trying to get put together.... It would be an application process that the building district would need to lay out the evidence behind what it is that they’re asking for.

The conditional framing – what the process “would” look like – reveals that years after ESSA’s passage, this state had not yet developed a functional mechanism for making needs-based funding determinations. Several other participants described formula processes developed outside the school improvement department, with funding decisions disconnected from the district application process altogether. In these cases, administrators could not confirm the exact mechanism by which allocation decisions were made or how year-to-year funding was aligned with root cause analyses. One participant’s account is particularly instructive as he stated:

“...when we made the decisions to fund only elementary schools and, in this case, the funding will be based on enrollment and priority/need of the school and/or district.”

The phrase “priority/need” appeared in the account without elaboration – no participant interviewed was asked to specify how need was operationally defined, measured, or weighted in relation to enrollment. This ambiguity in the data is itself analytically significant: if SEA administrators cannot articulate how need is defined in their funding process, it is unlikely that need – rather administrative habit – driving allocation decision. Rothstein’s (2004) observation that weaker education is systematically provided in high-poverty schools finding institutional confirmation in the absence of documented, need-responsive processes across multiple participating states.

State J offered a partial exception – a two – part process combining formula allocation with a competitive grant cycle involving a rubric of more than thirty items and interview component. A participant described its rationale: “The allocation of grants allowed us to be more intentional around funding decisions as it allowed them access their state and federal funding collectively.... Providing a better sense of what was available collectively across both funding streams.”

Yet the same participant acknowledged that the resulting allocations were “not necessarily based on the districts and schools saying this what they need” but rather on available dollars and characteristics like school size and the number of schools in improvement status. Even the most structured process in the dataset remained enrollment – and availability – driven rather than need -responsive.

Theme 3: Historical Harm Embedded in Institutional Practice

As codes related to past practice, carryover, predetermined amounts, and regional intermediaries were examined together, a third and more interpretively layered theme emerged: several state funding processes are not merely inadequate – they actively reproduce historical patterns of inequity by anchoring current allocations to prior- year decisions, prior-year decisions, priory-year spending capacity, and institutional arrangements that predate ESSA. This theme

addresses the first research question – how SEAs make funding decisions – at a deeper level than process description alone can reach. It surfaces the way institutional memory functions as a mechanism of harm.

State B’s carryover practice is the clearest illustration. A participant explained: “We focus heavily on carryover when making funding decisions.... In those cases of carryover, we use those funds to support other schools, but carryover will have an impact on how to fund a current application.”

Carryover unspent funds from prior grant year – is typically treated in federal education policy as an administrative management issue. But when it becomes a primary driver of the following year’s allocation decisions, it means that districts with the least organizational capacity to spend their improvement funds efficiently – often those serving the highest concentrations of students in poverty, where principal turnover, staff instability, and procurement challenges are greatest – receive less funding in subsequent cycles. The districts most in need of consistent, sustained investment are penalized for the very conditions that make improvement difficult. This is the interest convergence dynamic Bell (1980) describes operating in reverse rather than equity advancing when it serves dominant institutional interests, here institutional convenience actively works against the equity interests of the most marginalized schools.

Several states further complicated the equity picture by routing improvement funds through regional intermediaries – county office or intermediate regional agencies – rather than directly to school districts. In one such case, a participant explained that awards were based on the number of CSI schools a regional entity served and the number of schools in improvement status, with practice used by the regional entity to make final determinations. This layered structure inserts an additional institutional actor between federal stature and school-level need, one whose decision-making criteria are even less transparent than the

SEA's own process and whose historical relationships with local districts may themselves carry patterns of differential treatment. As Banks (2023) argues the racial capitalist logic governing public education operates precisely through such institutional arrangements – ones that appear administratively rational while consistently producing outcomes that extract measurable compliance metrics from Black and Brown schools without delivering commensurate resources.

Theme 4: The Gap Between Application Rhetoric and Funding Reality

The fourth theme emerged primarily from document analysis of California and New York's publicly available school improvement materials triangulated against interview accounts describing application processes across multiple states. Initial codes drawn from the documents – including “budget narrative,” “evidence-based requirement,” “review protocol,” “flagged items,” and allowable activities” – pointed to highly elaborated formal processes. But when these codes were examined alongside interview data describing how funding amounts were actually determined, a consistent gap appeared between the procedural sophistication of application systems and their actual influence on funding decisions. For example, New York's consolidated application review protocol instructed reviewers to flag items and request additional information across a detailed rubric. The NYSED also provided a budget template requiring a budget narrative that explained expenditures. Yet, despite this infrastructure, no evidence emerged in the protocol itself or in participants accounts that the review process was connected to a differentiated funding determination – that a stronger plan resulted in more funding, or that identified weaknesses triggered additional targeted resources. The application served as an approval mechanism, not a needs-assessment instrument. Similarly, California's application materials outlined an extensive process including webinars, expenditure tools, and guidance on evidence-based activities – but required only that districts document

allowable activities and costs rather than demonstrate that funding amounts were calibrated to scale or nature of identified needs.

Across both states, and consistent with interview data from other participating states, the application process functioned as a compliance ritual: it structured what districts were required to say about their improvement efforts without structuring how much they would receive in return. This finding speaks directly to the second research question – what SEAs look for in applications to determine funding levels – by revealing that in most cases, what SEAs look for is evidence of procedural compliance rather than evidence of need. Red through a critical policy lens, this is precisely the gap Ball (1994) identifies between the context of policy text production – where ESSA’s language of evidence-based improvement implies a tight coupling between demonstrated need and resource response – and the context of practice, where institutional capacity, administrative habit, and the path dependencies of prior funding cycles determine what actually happens. The formal rhetoric of rigorous application review coexists with funding processes that remain largely indifferent to the differentiated needs of the schools and communities the law was designed to serve.

Discussion and Conclusion

The findings of this study present a troubling portrait of how federal school improvement resources reach – or fail to reach – the schools and communities they were designed to serve. Across ten states, SEA administrators described funding processes for Section 1003a that were variously enrollment-driven, historically anchored, procedurally elaborate but substantively hollow, or in several cases simply absent. Taken together, these patterns are not only evidence of bureaucratic failure in isolated agencies; they are evidence of a systemic condition that the federal architecture for school improvement funding has been built upon and delivered through state institutional structures that were never designed to

center the education needs of Black, Brown, and low-income students. This discussion situates those finding within three intersecting bodies of scholarship – school finance equity research, contemporary policy analysis, and critical race theory – and argues that the gap between ESSA’s equity commitments and SEA funding practice is not a problem of implementation that better guidance can solve. It is a structural problem that requires structural remedy.

Enrollment-Based Allocation and the Limits of Formal Equity

The most prevalent finding in this study – that SEAs allocation Section 1003a funds primarily through enrollment-based formulas and that flat base allocation rather than differentiated need assessments – has a direct parallel in the school finance equity literature. Baker (2017, 2018) demonstrates that the distribution of fiscal resources is the primary lever shaping the quality of k-12 schooling at the system level, and that funding systems which apply formally equal criterial to schools with vastly unequal histories of investment produce structurally inequitable outcomes. Baker et. al, (2022) extend this argument specifically to state funding formula design, showing that even formulas constructed with equity intentions routinely disadvantage high – poverty districts because they fail to account for the compounding cost of serving students whose educational needs are intensified by concentrated poverty, inadequate housing, under-resourced neighborhoods, and historically underpaid teaching workforces.

The present study’s finding makes this dynamic visible at the school improvement level specifically. When State H allocates a flat \$100,000 base to every CSI school regardless of the depth or concentration its improvement challenges, and when State I calculates award amounts based on school size “or other characteristics” without specifying how poverty, race, or historical disinvestment factor into the formula, these agencies are applying the logic of formal equality to conditions that are substantively unequal. As Darling-Hammond (2013)

documents, school serving high concentrations of low-income students and students of color already receive fewer resources than their more affluent counterparts at the local and state levels – meaning that federal school improvement funds, if distributed through enrollment -based formulas rather than needs-weighted mechanisms, are being layered onto a pre-existing inequity rather than counteracting it. The result is a federal investment in school improvement that cannot do what it claims to do because its delivery mechanism is incompatible with the stated purpose.

This finding has salience in the context of contemporary school finance reform debates. Candelaria and Shores (201) provide compelling evidence that court-ordered school finance reforms have produced meaningful long-term improvements in student outcomes, particularly for students in poverty – precisely because those reforms compelled states to move away from enrollment-based and property-value-based allocation toward needs-weighted distributions. The school improvement funding decisions documented in this study move in the opposite direction: they apply enrollment weights to a federal program whose statutory language explicitly requires funds to support the most underperforming schools, suggesting a misalignment between what the law intends and what the institutional delivery mechanisms produces.

The Absence of Process as a Policy Condition

The second major finding – that several states lacked coherent or documented funding processes for Section 1003a at all – demands interpretation beyond the administrative. It would be tempting to read the accounts of participants from State E and B, who described process that were underdeveloped, disconnected from the application review, or driven by prior-year carryover, as evidence of organizational incapacity – agencies that simply have not yet built the infrastructure needed to implement ESSA’s intent. However, this interpretation

would miss the structural interpretation conditions it describes. Weiss and McGuinn (2017) document that SEAs have been given expanded mandates under successive education laws without commensurate investments in the organizational capacity needed to fulfill those mandates. The result is what Weinstock et al., (2019) describe as an institutional gap between the roles SEAs are formally expected to play and capabilities they actually possess – a gap that, critically, is not distributed equally across the student populations SEAs are meant to serve.

Ball's (1994) policy cycle framework is particularly illuminating here. ESSA was written in the context of influence and text production with language that implies a tight coupling between demonstrated school need and resource response – the law's provisions for comprehensive and targeted support interventions, its evidence-based activity requirements, and its directive that funds be used for “meaningful work” all presuppose an intentional, need responsive allocation process. However, in the context of practice, where SEA administrators with limited capacity, competing demands and longstanding institutional habits are translating that language into operational procedures, the coupling breaks down. The participant from State E who described a process that “we don't have in place yet” was not describing a personal failure but an institutional condition shaped by cases of federal underfunding of SEA capacity – a condition that, as Banks (2023) argues, is not accidental but structural, produced by a racial capitalist logic in which the state institutions responsible for improving Black and Brown schools have been systematically starved of the resources needed to so intentionally.

Application Review as Compliance Theater

The third major finding – that even states with elaborate application review process, funding decisions remained decoupled from application content –

represents the most direct evidence of what Ball (1994) identifies as the gap between policy text and policy practice. New York and California, two of the nation's largest and most resourced state education agencies, maintained detailed application infrastructure: consolidated review protocols, budget narrative templates, scoring rubrics and guidance documents. Yet in neither state did the evidence support the conclusion that application quality, demonstrated need, or the specificity of a district's improvement strategy influenced the amount of funding awarded. The application process, in both cases, functioned as a compliance mechanism – a way for SEAs to document that districts had engaged with the formal requirements of ESSA – rather than a needs-assessment instrument capable of differentiating funding responses.

The findings resonate with Cohen and Ball's (2007) analysis of the relationship between policy specification and practitioner use. They argue that the degree to which policy elaborates action – the specific with which it describes what practitioners should do and how – determines whether the policy is likely to be enacted in ways that substantively faithful to its intent. ESSA's guidance on section 1003a is specific about what kinds of activities are allowable and what evidence-based requirements must be met: it is much less specific about how funding amounts should be calibrated to the nature and depth of a school's improvement challenge. This gap in specification creates space for SEAs to develop application processes that satisfy the letter of the federal requirement – reviewing application, approving plans, documenting evidence-based alignment – without developing the equity intentional decision-making logic that the law's purpose implies. As Martinez and Spikes (2020) and Knight (2017) document, inequities in school resources are more complex and intractable than previously understood, in part because they are reproduced through procedural mechanisms that appear rigorous while producing outcomes that are inequitable.

The implication of this finding extends to the contemporary policy debate around ESSA's effectiveness as an equity tool. Uzell et al., (2024) demonstrate that ESSA's devolution of authority to states has not produced more equitable school improvement outcomes in practice, in part because the law's flexibility provisions create space for states to design processes that prioritize administrative manageability over equity intentional practice. The application review processes documented in this study illustrate that finding at the level of funding mechanism specifically: flexibility without equity accountability produces procedural compliance without substantive change.

Historical Harm and the Racial Capitalist Logic of School Improvement Funding

Across all four findings, a deeper interpretive pattern emerges that the school finance equity literature and contemporary policy analysis illuminate but do not fully explain on their own. The enrollment-based formulas, the absent processes, the carryover dependencies, and the compliance-oriented application reviews documented in this study are not isolated technical failures. They are institutional expressions of what Banks (2023) identifies as the racial capitalist logic governing public education – a logic in which the state institutions responsible for improving schools serving Black and Brown students systematically extract measurable compliance metrics from those communities' while delivering resources designed for administrative convenience rather than equity-intentional purpose. As such, the funding processes documented here are precisely the kind of institutional arrangements that interest convergence theory predicts they satisfy the organizational interests of SEAs, they satisfy the compliance interests of federal oversight, and they fail the improvement interests of the school they were designed to serve.

The implications for school finance equity scholarship are significant. Baker (2018) argues that the evidence base for money's effects on student outcomes is now sufficiently strong that the burden of proof has shifted – the question is no longer whether adequate and equitably distributed funding matters but whether the political will exists to deliver it. This study suggests that the problem operates at a level below the political: even when federal law creates a funding mechanism specifically designed to direct resources to the most underserved schools, the institutional delivery system through which those resources flow can reproduce the same patterns of inequity that the law was designed to address. The adequacy and equity of school improvement funding is not only a question of how much money is appropriated at the federal level but of how institutional architecture of state-level distribution is designed, whose interests that architecture serves, and whether equity accountability mechanisms are sufficiently specific to prevent the gap between policy intent and policy practice that this study documents.

Implications for Policy and Practice

These findings carry direct implications for federal and state policymakers, SEA leaders, and the researchers who study them. The current framework allows states to satisfy their reporting requirements through process compliance—demonstrating that an application was reviewed, a plan was approved, a budget was submitted – without demonstrating that the funding amount was calibrated to the scale or nature of the school's improvement challenge. A need weighted accountability mechanism, analogous to those that have produced equity gains in state court-ordered finance reforms (Candelaria & Shores, 2019), would create the structural incentive for SEAs to move from enrollment-based to need-responsive allocation.

For SEA leaders and school improvement practitioners, this study's findings suggest that the application process – currently functioning in most states as a compliance ritual – represents an unrealized opportunity. If application review were redesigned to generate information that actually informed differentiated funding decision, the application could become the equipment instrument it is nominally present as. This would require SEAs to move from reviewing applications for procedural compliance to analyzing them for depth of need they reveal – a shift that requires both organization capacity and a deliberate institutional commitment to equity-intentional practice that the current federal framework does not compel.

Conclusion

Education policy in the United States has long been positioned as a tool for promoting equity, accountability, and improvement. ESSA represented a genuine federal commitment to improving schools that have historically been most underserved. Yet, as this study demonstrates, the institutional architecture through which those resources are delivered has been redesigned to match the law's equity ambitions. Enrollments-based formulas, carryover-dependent allocation, absent process, and compliance-oriented application reviews are the intuitional expressions of a deeper structure conditions: the SEA systems through which school improvement funds flow were built for compliance monitoring not equity-intentional resources distribution, and ESSA's expanded mandate has not been accompanied by the capacity investment, equity accountability mechanisms or structural redesigned needed to change that.

Critical scholarship on racial capitalism in education (Banks, 2023; Robinson, 1983) reminds us that this condition is not accidental. The persistent underfunding of schools serving Black and Brown students, and the persistent absence of institutional mechanisms – formulas, rubrics, compliance reviews – that appear

neutral. Narrowing the gap between what ESSA promises and what SEA funding processes deliver will require more than better guidance or improved organizational capacity, though both matter. It will require a deliberate, equity-intentional redesign of the institutional delivery system itself – one that is accountable not to the administrative convenience of state agencies but to the education needs of the students those agencies were created to serve.

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