

ANALYSIS OF EQUITY IN BOARD OF EDUCATION POLICIES

Prepared for Alexandria City Public Schools

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In the following report, Hanover Research evaluates the extent to which school board policies are framed with a lens towards equity at six school districts, including Alexandria City Public Schools. Using a rubric adapted from a policy analysis tool created by the Great Lakes Equity Center, this analysis reviews policies according to four dimensions of equity: Resource Distribution, Education Programs, School Climate, and Achievement.

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EXECUTIVE SUMMARY AND KEY FINDINGS

INTRODUCTION

Alexandria City Public Schools (ACPS) has expressed an interest in assessing the equity and fairness of district policies as they address the needs of students with a wide range of social identities. More specifically, ACPS has requested the assistance of Hanover Research (Hanover) in the evaluation of all **foundations and basic commitment, instructional program student, and school-community relations** policies and the extent to which they support an equity lens. With this central aim, ACPS is interested in understanding answers to the following research questions:

- *What are the components of high-quality district and school policies that focus on equity?*
- *How do districts include wording related to resources and services for student groups who are historically and repeatedly represented in achievement gap data?*
- *In what ways do ACPS policies compare to those of peer and/or exemplary school districts?*
- *How do ACPS policies address equitable practices for students in terms of socioeconomic status, religion, culture, race, gender preference, and gender identity?*
- *What next steps can ACPS take to support an equity lens in policy aligned with the district's 2020 Strategic Plan?*

The following report consists of a policy analysis performed by Hanover analysts in an effort to address these research questions, the results of which are organized into two primary sections. In **Section I: The Equity of Peer and Exemplary School Districts**, Hanover first synthesizes findings from a review of secondary articles and published reports that detail key components of high-quality district policies focusing on equity as well as a rubric for policy evaluation. Using this discussion as a framework for further investigation, Hanover analyzes policies of peer and exemplary school districts that relate to the following areas: basic commitment, school-community relations, instructional program, and students. In **Section II: Analysis of ACPS Policies and Recommendations for Enhancement**, Hanover applies the same policy framework to assess the equity of ACPS's policies. Comparisons are made between ACPS's policies and those of the districts reviewed in Section I to determine any improvements that may be made to promote fairness and to better align policies with the division's priorities.

KEY FINDINGS

- **Standalone equity policies focus primarily on promoting student equity and closing student achievement gaps.** Educational equity is achieved when all students are provided with the resources and conditions necessary to realize academic excellence across all valued indicators of success. To direct these efforts, equity policies protect against discrimination and harassment based on a wide array of student characteristics including, among others, race/ethnicity, socioeconomic status, language proficiency, disability, gender identity, and sexual orientation. In standalone

equity policies, districts state their commitment to educational equity, define relevant terms, identify existing inequities, and present a plan (of varying specificity) for correcting the existing inequities and closing the achievement gap.

- **Four dimensions of equity may be embedded in the framing of a school board’s policies.** These dimensions pertain to equity in the distribution of a district’s resources, access to programming and instruction, school climate, and student achievement outcomes. According to the California Department of Education (CDE), resource equity “addresses the distribution of, and access to, high-quality administrators, teachers, and other school personnel; funding; high-quality materials and equipment; technology; facilities; and community resources or partnerships.”¹ Program equity refers to “the policies and practices that lead to student participation in curricular and extracurricular courses, programs, or other activities, as policies and practices relate to student selection, enrollment, support, assessment, and completion.”² Equity in school climate “addresses student engagement, academic and other supports for students, and safety.” Finally, “[a]chievement equity addresses the academic outcomes and performance of all students on all indicators” in which policy outlines inclusive strategies for meeting the diverse needs of all students.³ Altogether, a district’s policies should address each of these dimensions.
- **The equity of school board policies and the wording used to describe resources and services for different student subgroups may be analyzed across six policy domains based on a policy analysis tool created by the Great Lakes Equity Center (GLEC).** These domains refer to policies’ inclusion of legal mandates, research-based evidence, contextual background, delineation of resources, decision-making criteria, and processes of accountability. Board policies centered on the distribution of resources and services for historically underserved groups are often organized under foundations and basic commitments as well as instructional policy sections. The language of these policies tends to be structured in terms of student need to accommodate barriers to learning. For example, at Springfield School District 186 (SSD), board policy states that the district shall “provide substantially equivalent educational opportunities for its students at each building, including but not limited to the availability of educational materials and supplies, curricular offerings, and personnel. This policy shall be implemented so as to provide flexibility in meeting the unique needs of the District’s students.”
- **Out of all six school districts profiled in this report, the extent to which ACPS’s policies incorporate a lens towards equity is comparable to most.** Using GLEC’s rubric and a four-scale policy language rating system, ACPS received a summative score of 45 out of a possible 108 points. This rating is marginally lower than the scores of SSD, Aldine Independent School District (AISD), and Roanoke City Public Schools (RCPS), and is higher than Farmington Public Schools’ (FPS) score of 39. However, Cambridge Public Schools’ (CPS) policies are ranked considerably higher than ACPS in

¹ “Equity - Equity and Access,” Op. cit.

² “Equity - Equity and Access,” Op. cit.

³ Ibid.

terms of the depth with which they discuss the equity of the district's educational practices.

ACPS may enhance the equity of its policies through four recommendations:

- **Make clear references to research or scholarly work to help highlight the importance of equity for student success:** Missing from ACPS's policies are references to research or evidence-based strategies for establishing equitable and fair practices for distributing resources, creating and implementing programs, establishing safe and welcoming school environments, and reducing gaps in achievement. Despite the relatively few references made to research among ACPS's and other districts' policies, literature suggests that incorporating evidence from research into policy helps to establish the legitimacy of claims that equity is essential to improving the educational outcomes of all students—particularly those that have faced historical disadvantages.
- **Provide clarity on the specific student subgroups that have historically been marginalized in school settings that may be eligible to receive additional resources or enroll in specialized programs:** While ACPS's policies provide some context about the equitable provision of resources, enrollment opportunities in programs for language learners or students with disabilities, and differentiated instruction for meeting the unique needs of all students, they notably lack more detailed information about the allocation of these resources for racially or socioeconomically disadvantaged students. By comparison, CPS's School Board offers a Controlled Choice Plan that explains the district's "core values of academic excellence and social justice for all students" as well as the procedures for "providing equal access to an array of highly attractive, excellent quality schools." **Create policy that protects against bullying in support of creating safe and welcoming school environments:** ACPS does not include a separate policy on bullying prevention or interventions and procedures to address reported bullying behavior, a policy that is often used to convey the importance of student safety and welcoming environments. Most other districts analyzed in this report include policies focused on bullying prevention.
- **Make the elimination of gaps in achievement a more clearly defined goal and identify steps the division will take to address these gaps:** Despite that gaps in achievement between different student subgroups signal barriers to learning and educational success, few districts, including ACPS, provide an in-depth discussion of educational equity for improving achievement and eliminating inequalities in educational outcomes. Further discussion of achievement gaps, how they are measured, and their linkages to educational barriers may benefit ACPS in its aim to establish a clear framework for addressing equity in education.

SECTION I: THE EQUITY OF PEER AND EXEMPLARY SCHOOL DISTRICT POLICIES

In the following section, Hanover first reviews best policy practices for equity as described by policy analysts using information synthesized from secondary articles and published reports. Careful consideration is given to a rubric created by the Great Lakes Equity Center (GLEC) for analyzing the equity of school and district policies. This discussion is followed by an analysis of the basic commitment, instructional program, student, and school-community relations policies of ACPS's peer and exemplary school districts. Results of this analysis are used to identify language that clearly articulates the importance of equity and fairness for school and district practices.

BEST POLICY PRACTICES FOR EDUCATIONAL EQUITY

DEFINING EQUITY AND STUDENT DIVERSITY

The equity of district policies refers to how transparent a local education agency is when describing access to educational programs and supports, the processes and practices a district implements to ensure fairness, and the educational outcomes of students with the aim of closing gaps in achievement.⁴ **Educational equity is achieved when all students are provided with the resources and conditions necessary to realize academic excellence across all valued indicators of success.**⁵ It should be noted that equity differs from equality in that it is "achieved when all students receive the resources they need so they graduate prepared for success after high school."⁶ Equality, on the other hand, is "achieved when students are all treated the same and have access to similar resources," describes the Center for Public Education (CPE).⁷

These and comparable definitions are promoted across a wide array of organizations affiliated with primary and secondary education. More importantly, leaders of education policy and practice emphasize the importance of ensuring equity as it applies to *all students with different identities*. According to the National School Boards Association (NSBA), for instance, public school districts must "ensure that all students have the knowledge and skills to succeed as contributing members of a rapidly changing, global society, regardless of factors such as **race, gender, sexual orientation, ethnic background, English proficiency, immigration status, socioeconomic status, or disability.**"⁸

Given these objectives, policies defining equity for the educational success of all students must recognize the meaning of *student diversity*. "Diversity is a multidimensional, broadly

⁴ "Equity Toolkit for Administrators." Colorado Department of Education, 2010.
<https://www.cde.state.co.us/postsecondary/equitytoolkit>

⁵ Ibid., p. 6.

⁶ "Educational Equity: What Does It Mean? How Do We Know When We Reach It?" Center for Public Education, January 2016. p. 6. <http://www.centerforpubliceducation.org/educationalequity>

⁷ Ibid.

⁸ Bolded emphasis added: Ibid., p. 2.

inclusive concept that acknowledges and embraces the richness of human differences,” writes the NSBA, highlighting that “attention to diversity is part and parcel of any meaningful conversation about improving the educational experience and outcomes for all students.”⁹ Subsequently, **the NSBA encourages school boards to clearly define diversity and the various identities it encompasses.** Accordingly, district policies typically include the following when outlining diversity and practices for equity: race, ethnicity, sex, socio-economic status, neighborhood, language status, special education needs, academic performance and potential, record of achievement, community or civic engagement or interest.¹⁰ Of course, the inclusion of student identities into a district’s definition of diversity should remain flexible and responsive to the student population and key priorities for future goals.¹¹

Districts typically institute equity policies in order to close achievement gaps between students that are predicated on a variety of inequities, which often stem from social, socioeconomic, cultural, or institutional factors. The Glossary of Education Reform, a database created by the Great Schools Partnership, notes that, once districts “identify disparities in educational performance or results,” they then attempt to correct these inequities through implementation of more equitable practices and programs. This may consist of “increasing funding levels, redesigning school programs, teaching students in different ways, or providing comparatively more educational services and academic support to students with greater needs.”¹²

A graphic titled "Equity-Related Laws" enclosed in a teal rounded rectangle. At the top is a teal icon of a classical building with three columns. Below the icon, the title "Equity-Related Laws" is written in bold teal text. Underneath the title is a bulleted list of five laws in teal text: "Titles VI and VII of the Civil Rights Act", "Title IX of the Education Amendments", "Section 504 of the Rehabilitation Act", "Equal Pay Act", and "The Americans with Disabilities Act".

- *Titles VI and VII of the Civil Rights Act*
- *Title IX of the Education Amendments*
- *Section 504 of the Rehabilitation Act*
- *Equal Pay Act*
- *The Americans with Disabilities Act*

Aside from delineating the identities for which equity and fairness apply and closing gaps in achievement, policies for equity should provide some context with which to understand the importance of upholding such practices. Providing sufficient evidence of such practices as a means to sustain educational equity can help “enhance the potential legal sustainability of [equity] policies.”¹³ Figure 1.1 on the following page is reproduced from a report published by the NSBA and reviews actionable steps school boards may take to define diversity and the importance of maintaining equity in district practices.

⁹ Coleman, A.L., F.M. Negrón, Jr., and K.E. Lipper. “Achieving Educational Excellence for All: A Guide to Diversity-Related Policy Strategies for School Districts.” National School Boards Association, 2001. p. 20. <http://glec.education.iupui.edu/equity/EducExcellenceForAll-PrintFriendly.pdf>

¹⁰ Ibid.

¹¹ Ibid., p. 21.

¹² “Equity Definition.” The Glossary of Education Reform, May 15, 2013. <http://edglossary.org/equity/>

¹³ Ibid.

Figure 1.1: Steps to Define the Importance of Diversity and Equity in District Policy

- **School boards and other education leaders should ensure that diversity-related policies reflect an inclusive definition of diversity, tailored to specific district and/or school needs. Common factors considered include: race, ethnicity, sex, socio-economic status, neighborhood, language status, special education needs, academic performance and potential, record of achievement, and community or civic engagement or interest.**
- **School boards and leaders can enhance the potential legal sustainability of any policies in which educational opportunities or benefits are provided to students (at least in part) based on their race or ethnicity with evidence that establishes:**
 - **The specific and compelling interests in diversity that such policies further;**
 - **That the design and implementation of such policies is appropriately calibrated, so as to neither over-rely nor under-rely on race and ethnicity as factors in meeting those interests; and**
 - **A process pursuant to which such policies are periodically reviewed and evaluated, and where necessary, modified.**

Source: Coleman, Negrón, Jr., and Lipper¹⁴

POLICIES FOCUSED EXPLICITLY ON EDUCATIONAL EQUITY

In many cases, local education agencies will include policies or statements that directly reflect a district’s commitment to maintaining educational equity. The scope, language, and focus of these types of policies are reviewed below. Further information about the specific content of these policies is provided in Appendix A.

EQUITY POLICY SCOPE

While comprehensive equity policies typically identify and aim to remedy multiple forms of prejudice and discrimination, equity policies may vary in scope depending on local factors and needs. In an example of a more expansive approach to equity policy, the New Jersey Department of Education’s “Comprehensive Equity Plan” states that the first responsibility of local school boards is to “adopt, or re-adopt written equality and equity policies” that require districts to “identify and address all forms of prejudice and discrimination in all district, charter and renaissance school project programs, practices, curricula, instructional materials and assessments.”¹⁵

The literature indicates that **equity policies should focus on addressing the specific needs of an individual district, rather than taking the broadest approach to establishing equity.** For instance, when the Washington State School Directors’ Association considered crafting a state-level racial equity policy, it concluded that “a model policy could not address the broad range of the conditions of equity across our school districts.” Rather, “the development of such policy must be done at the local level to reflect the conditions and aspirations of the

¹⁴ Ibid.

¹⁵ “Comprehensive Equity Plan for School Years 2016-17 through 2018-19.” New Jersey State Department of Education. p. 8. <http://www.state.nj.us/education/equity/cep/cep.pdf>

community.”¹⁶ In order to assess equity needs and craft a policy reflective of the individual needs of a district, the CPE suggests that districts concerned with equity first examine performance by school and by student group.¹⁷

EQUITY POLICY LANGUAGE

District equity policies, especially when focused on promoting equity for specific student groups, often use detailed, explicit policy language in order to minimize ambiguity. Comprehensive equity policies clearly identify the various social, socioeconomic, cultural, and personal factors that the district will focus on to promote equity. For instance, in its “Nondiscrimination and Equity” policy, Tacoma Public Schools asserts:

Achievement gaps between students predicated on race, religion, color, national origin or ancestry, sex, gender identity, sexual orientation, age, marital or veteran status or disability status are unacceptable if we are to meet our mission and vision statements and our moral obligations to our students, their families and our community as a whole.¹⁸

The most detailed equity policies define specific terms pertaining to the protected group, lay out explicit rights for that group, and explain protocols surrounding such students. As an example, in its transgender policy guide, District of Columbia Public Schools (DCPS) defines terms such as gender expression and identity.¹⁹ Policies also often state, in varying levels of detail, explicit steps that the district plans to take in order to remedy identified inequities. For instance, Saint Paul Public Schools’ (SPPS) racial equity policy lays out a plan for eliminating racial inequities by, among other strategies, developing “the personal, professional, and organizational skills and knowledge of its employees to enable them to address the role and presence of racism.”²⁰

EQUITY POLICY FOCUS

Equity policies typically focus on promoting student equity and closing student achievement gaps. Policy may mention teacher equity in terms of hiring and professional development practices, but districts generally frame teacher equity as a necessary component of supporting student equity, rather than focusing on teacher equity as a distinct issue.²¹

¹⁶ Equity: Road toward Racial Equity Policy.” Washington State School Directors’ Association, 2016. p. 1.

<https://www.psed.org/wp-content/uploads/2016/03/WSSDA-Road-toward-Equity-Policy.pdf>

¹⁷ “Educational Equity: What Does It Mean? How Do We Know When We Reach It?” Op. cit., p. 8.

¹⁸ “Policy No. 3111: Nondiscrimination and Equity.” Tacoma Public Schools, 2014. p. 2.

<http://www.tacoma.k12.wa.us/information/departments/equity/SiteAssets/Pages/about/TPSD%20Nondiscrimination%20and%20Equity%20Policy.pdf>

¹⁹ “Transgender and Gender-Nonconforming Policy Guidance.” District of Columbia Public Schools, 2015. p. 2.

<http://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS%20Transgender%20Gender%20Non%20Conforming%20Policy%20Guidance.pdf>

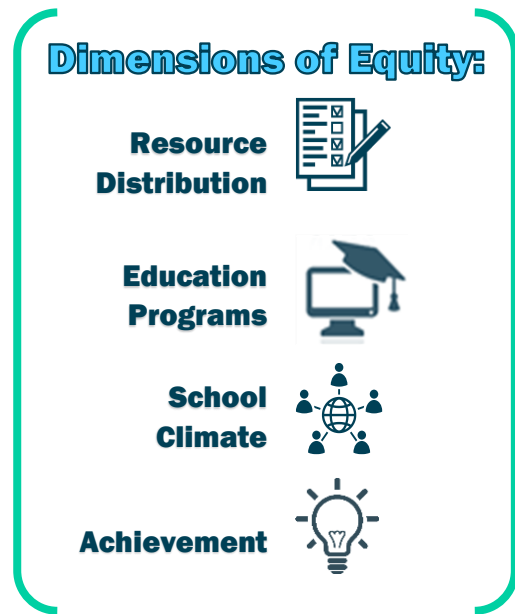
²⁰ “Racial Equity.” Saint Paul Public Schools Policy, June 16, 2013. p. 1. <https://equity.spps.org/uploads/racial-equity-policy.pdf>

²¹ “Educational Equity: What Does It Mean? How Do We Know When We Reach It?” Op. cit., pp. 5-6.

DIMENSIONS OF EQUITY FOR COMPREHENSIVE POLICIES

While districts are encouraged to create policies with an explicit focus on maintaining educational equity, equity may be embedded in the framing of all school board policies. In other words, a wide range of district policies should highlight how practices to promote student success will be implemented. In a document released by the Colorado Department of Education titled *Equity Toolkit for Administrators*, for example, contributing authors list several frameworks that can be used to guide equity practices in schools, including James A. Banks’s Framework of Cultural Competency; Paul Gorski’s Framework of Shifts in Consciousness; and Deborah Voltz’s Framework of Urban Teacher Competencies, to name a few.²²

While these and other frameworks focus on equity in practice, the California Department of Education (CDE) provides a number of resources that help define dimensions of equity for district policy.²³ In total, the CDE lists four dimensions of equity that can be used to frame school board policies as they communicate the district’s intent to implement fair educational practices. These dimensions include resource distribution, education programs, school climate, and achievement, each of which overlap with guidelines promoted by the National Education Policy Center (NEPC) for measuring school quality and inclusivity.²⁴



RESOURCE DISTRIBUTION

According to the CDE, resource equity “addresses the distribution of, and access to, high-quality administrators, teachers, and other school personnel; funding; high-quality materials and equipment; technology; facilities; and community resources or partnerships.”²⁵ Fair access to resources in the classroom and effective educators is crucial to ensuring that each student has the opportunity to succeed academically.²⁶ Policies that outline basic district goals, general school administration practices, financial management, support services, and personnel should each address how such resources will be made available to all students, particularly given their specific needs.

²² “Equity Toolkit for Administrators,” Op. cit., pp. 17–18.

²³ “Equity - Equity and Access.” California Department of Education. <http://www.cde.ca.gov/qs/ea/>

²⁴ For more information about the NEPC’s indicators of school quality and inclusivity, see: Penuel, W.R., E.J. Meyer, and M.R. Valladares. “Making the Most of the Every Student Succeeds Act (ESSA) – Helping States Focus on School Equity, Quality and Climate.” *National Education Policy Center*, November 15, 2016. <http://nepc.colorado.edu/publication/ESSA>

²⁵ “Equity - Equity and Access,” Op. cit.

²⁶ Ibid.

EDUCATION PROGRAMS

Across the nation, students of color and low-income students overwhelmingly face social disadvantages that pose challenges to their education, especially in comparison with their more privileged peers.²⁷ Socially disadvantaged students often have less access to educational resources and are concentrated more often in less rigorous courses with poorer instruction regardless of academic ability.²⁸ This not only causes students to remain segregated within schools as they advance in their educational pathways, but it reproduces inequalities on the basis of social background as disadvantaged students are placed in less academically challenging courses with fewer supports.²⁹ Indeed, gaps in academic achievement and graduation rates continue to persist across student race and income because of these inequalities.³⁰

In an effort to address these gaps, districts may outline policies for programmatic equity, or “the policies and practices that lead to student participation in curricular and extracurricular courses, programs, or other activities, as policies and practices relate to student selection, enrollment, support, assessment, and completion.”³¹ It is critical that schools and districts articulate policy goals and strategies for eliminating disproportionate and unequal access to programs, high-level curricula, and other educational services.³² Policies should also outline how families will be provided with opportunities for meaningful engagement with education programs, their development, and implementation.³³

SCHOOL CLIMATE

Researchers and leaders of education overwhelmingly agree that school climate, including student-student and educator-student relationships, is important for building supportive environments and enhancing students’ learning outcomes.³⁴ “One of the fundamentally important dimensions of school climate is relational and involves how ‘connected’ people feel to one another in school,” write Jonathan Cohen and his coauthors in a review of research on school climate.³⁵ On the whole, studies show that students learning in positive, engaging, and safe school climates are more likely to experience increased academic engagement and motivation, better socioemotional health, improved academic outcomes, and a decline in

²⁷ Loveless, T. “How Well Are American Students Learning?” Brown Center on Education Policy at Brookings, 2013. pp. 17–18. <http://www.brookings.edu/~media/research/files/reports/2013/03/18-brown-center-loveless/2013-brown-center-report-web.pdf>

²⁸ Burris, C.C., K. Welner, and J. Bezoza. “Universal Access to a Quality Education: Research and Recommendations for the Elimination of Curricular Stratification.” Boulder and Tempe: Education and the Public Interest Center & Education Policy Research Unit, 2009. p. 4. <http://epicpolicy.org/publication/universal-access>

²⁹ *Ibid.*, pp. 3–6.

³⁰ “Educational Equity: What Does It Mean? How Do We Know When We Reach It?” *Op. cit.*, p. 3.

³¹ “Equity - Equity and Access,” *Op. cit.*

³² “Educational Equity: What Does It Mean? How Do We Know When We Reach It?” *Op. cit.*

³³ Del Razo, J.L. et al. “Leveraging Time for School Equity: Indicators to Measure More and Better Learning Time.” Annenberg Institute for School Reform, 2014. pp. 20–21. <http://timeforequity.org/uploads/LeveragingTimeforSchoolEquity.pdf>

³⁴ Cohen, J. et al. “School Climate: Research, Policy, Practice, and Teacher Education.” *Teachers College Record*, 111:1, 2009. p. 183. <https://schoolclimate.org/climate/documents/policy/School-Climate-Paper-TC-Record.pdf>

³⁵ *Ibid.*, p. 185.

riskier behaviors.³⁶ Given the connections between climate and students’ well-being, it is important that schools and districts articulate an equitable approach to creating and sustaining positive learning environments. Overall, “[s]chool climate equity addresses student engagement, academic and other supports for students, and safety,” writes the CDE. Ultimately “[...] effective school leaders ensure that every student enjoys a schooling experience that is conducive to learning and thriving, with school leaders providing everything students need in order to achieve academically.”³⁷

ACHIEVEMENT

In addition to the above dimensions for policy equity, schools and districts should emphasize equitable instructional practices and access to supports with the aim of achieving high academic outcomes across different student groups.³⁸ “Achievement equity addresses the academic outcomes and performance of all students on all indicators” in which policy outlines inclusive strategies for meeting the diverse needs of all students.³⁹ As such, policies should articulate any barriers students may face to academic achievement, the seriousness with which the district aims to eliminate those barriers, and how the school or district proposes to measure progress towards equity in academic achievement.

RUBRIC FOR ASSESSING EQUITY OF DISTRICT POLICIES

Altogether, a comprehensive set of basic commitment, instructional program, student, and school-community relations policies should incorporate the four dimensions of equity described above. However, measuring the extent to which district policies incorporate these dimensions of equity requires further analytical scrutiny. The rubric displayed in Figure 1.2 on the following page is adapted from a policy analysis tool created by the GLEC designed to rate the equity of district policies. In brief, GLEC is a regional center funded by the U.S. Department of Education with the mission to:

[...] ensure equity in student access to and participation in high quality, research-based education by expanding states' and school systems' capacity to provide robust, effective opportunities to learn for all students, regardless of and responsive to race, sex, and national origin, and to reduce disparities in educational outcomes among and between groups.⁴⁰

³⁶ More information can be found at: [1] Smerdon, B.A. “Students’ Perceptions of Membership in Their High Schools.” *Sociology of Education*, 75:4, 2002. [2] Shochet, I.M. et al. “School Connectedness Is an Underemphasized Parameter in Adolescent Mental Health: Results of a Community Prediction Study.” *Journal of Clinical Child and Adolescent Psychology*, 35:2, 2006. http://www.tandfonline.com/doi/pdf/10.1207/s15374424jccp3502_1 [3] Cohen et al., Op. cit. [4] McNeely, C.A., J.M. Nonnemaker, and R.W. Blum. “Promoting School Connectedness: Evidence from the National Longitudinal Study of Adolescent Health.” *Journal of School Health*, 72:4, 2002. <http://www2.gsu.edu/~wwwche/Promoting%20School%20Connectedness%20Evidence%20from%20the%20Nat%20Longitudinal%20Study%20of%20Adolescent%20Health.pdf> [5] Whitlock, J.L. “Youth Perceptions of Life at School: Contextual Correlates of School Connectedness in Adolescence.” *Applied Developmental Science*, 10:1, January 1, 2006.

³⁷ “Equity - Equity and Access,” Op. cit.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ “Policy Equity Analysis Tool.” Great Lakes Equity Center, May 2015. p. 1.

http://glec.education.iupui.edu/Images/equity_tools/2015_06_30_Policy_Equity_Analysis_Tool_clw.pdf

Figure 1.2: Great Lakes Equity Center Policy Equity Analysis Rubric

POLICY DOMAINS	RATING CATEGORIES			
	NOT AT ALL	VERY LITTLE	SOMEWHAT	TO A GREAT EXTENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 				
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 				
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 				
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 				
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e., disproportionality in participation and outcomes of particular student groups)? 				
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 				
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 				
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 				
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 				

Source: Great Lakes Equity Center⁴¹

The equity analysis tool developed by GLEC includes “six analytical domains to support the examination of regulatory documents (e.g., policies and procedures) with a particular focus on educational equity,” and in this report, is used to assess how well ACPS and other school districts address the four dimensions of equity outlined in policies.⁴² These domains refer to policies’ inclusion of legal mandates, research-based evidence, contextual background, delineation of resources, decision-making criteria, and processes of accountability.

⁴¹ This rubric is replicated nearly entirely verbatim from a tool created by: “Policy Equity Analysis Tool,” Op. cit.

⁴² Ibid.

For every domain, GLEC recommends that policies are rated along a four-category Likert Scale: “not at all,” “very little,” “somewhat,” and “to a great extent.” Unfortunately, GLEC does not define these rating categories in any of the organization’s resources made publically available. In an effort to clearly define methods for policy evaluation, Hanover builds on GLEC’s tool and uses the following categories (and assigned scores) to measure the incorporation of content in each of the policy domains:

- **Not at All (Hanover score of 0):** no mention of the domain’s content is made in the policy.
- **Very Little (Hanover score of 1):** approximately one to two sentences address the domain’s content in the policy. The reference to this content is brief and does not include citations or examples of the content discussed. References to equity are vague and indirect.
- **Somewhat (Hanover score of 2):** approximately three to five sentences and/or one paragraph that addresses the domain’s content in the policy. The reference to this content includes citations and/or examples of the content discussed. Policy may receive a score of 2 if fewer sentences are included but the discussion of equity is more direct as it addresses inequalities or efforts to reduce barriers to education.
- **To a Great Extent (Hanover score of 3):** multiple paragraphs address the domain’s content in the policy. The reference to this content includes citations and/or examples of the content discussed in great detail. If only several sentences are included, a policy may still receive a score of 3 if a district has made a clear, conscious effort to articulate equity in educational practices, specifically emphasizing the importance of equity for supporting all students.

These scores rank policy content both in terms of *quantity* (the number of sentences included to discuss equity) as well as *quality* (the clarity with which equity is emphasized as important to educational practices). As a result, there is likely to be some variation in how analysts interpret and rank policies based on the combination of these two elements. Appendix B includes a discussion of researchers’ reflections on the policy evaluation, the use of this rubric and ranking system to measure equity in policy, and notes about the school districts researchers feel have exemplary policies with a lens towards equity. To further illustrate the use of this rubric and the ranking system, however, consider Hanover’s analysis of the excerpt reproduced in Figure 1.3 taken from Cambridge Public Schools’ foundations and basic commitments policy on nondiscrimination on the basis of sex (Policy File ACA):

Figure 1.3: Cambridge Public Schools, File ACA: Non-Discrimination on the Basis of Sex

The Cambridge School Committee, in accordance with Title IX of the Education Amendments of 1972, declares that the school district does not and will not discriminate on the basis of sex in the educational programs and activities of the public schools. This policy will extend not only to students with regard to educational opportunities, but also to employees with regard to employment opportunities. The School Committee further incorporates as if fully set forth herein its policy entitled Cambridge Public Schools Non-Discrimination Policy and Prohibition Against Sexual Harassment.

The School Committee will continue to ensure fair and equitable educational and employment opportunities, without regard to sex, to all of its students and employees.

The School Committee directs the Superintendent to designate an individual to act as the school district's Title IX compliance officer. All students and employees will be notified of the name and office address and telephone number of the compliance officer.

LEGAL REFS.: Title IX of the Education Amendments of 1972, 20 U.S.C. §1681 as amended

45 C.F.R. Part 86, as amended

M.G.L.c. 76, §§5 & 16 (Chapter 622 of the Acts of 1971)

Access to Equal Educational Opportunity, 603 C.M.R. 26.00 as amended

Using the rubric, this policy would be rated as a dimension of school climate as it directly addresses equity in terms of student experience, protection, and safety. While the policy makes clear linkages to legal mandates such as Title IX legislation, it only states that students/employees will not be discriminated on the basis of sex with regards to “educational programs and activities of the public schools” or “employment opportunities.” Indeed, this policy provides no further context about the conditions of nondiscrimination, information on how resources are to be allocated in support of nondiscrimination, and examples of compliance or procedures for handling complaints. Terms for accountability remain vague since the policy only states that the superintendent is responsible for designating a compliance officer. As is, this policy would be rated a score of ‘1’ given the rating system. However, if the Cambridge Public Schools’ School Board was to include additional policies related to school context that delve deeper into these policy domains, scores for this dimension of equity would increase.

Indeed, not all policies that fall under those for ‘basic commitment,’ ‘instructional programs,’ ‘students,’ and ‘school-community relations’ will address every dimension of equity (i.e., resource distribution, education programs, school climate, and achievement), nor will they necessarily require the incorporation of every policy domain. Where appropriate, Hanover uses the abbreviation ‘N/A’ to indicate when a domain for a particular equity dimension might not fit with a school district’s policies or goals. Thus, the rubric’s comprehensive set of criteria enable Hanover to measure a wide array of district policies and their equity at large. Prior to reviewing findings from the policy equity analysis, Hanover first details methods for selecting peer and exemplary districts in greater detail.

METHODS FOR PEER AND EXEMPLARY DISTRICT SELECTION

PEER SCHOOL DISTRICTS

To create an initial list of peers to ACPS, Hanover first consulted the National Center for Education Statistics' (NCES') Public School District Search tool. This database allows users to search for public school districts using data reported in the Common Core of Data (CCD) file, a dataset containing a range of demographic and fiscal information on all U.S. public school districts from the 2014-2015 academic year. Using available search criteria, Hanover analysts identified all urban midsize, regular public school districts serving anywhere between 14,000 and 15,000 total students. Hanover then cross-referenced all listed districts with individual district profiles available on the NCES website to assess the racial diversity of resident populations. **In total, Hanover identified nine peers to ACPS using these criteria, one of which was randomly selected to investigate its district policies: Springfield School District 186, IL.**

EXEMPLARY SCHOOL DISTRICTS

Beyond this initial list of districts comparable in size and diversity to ACPS, Hanover took additional steps to identify other public school districts with more detailed, publically available information on equity policies and/or those districts that have been recognized for their equity initiatives. Hanover analysts conducted an online scan to collect information on these districts using Google, GoogleScholar, EBSCOHost, and ProQuest databases, applying several variations of keyword searches including terms such as “equity,” “policy,” and “education.”

Hanover identified several districts that been recognized for their efforts towards equity and diversity. These districts include Aldine Independent School District, TX, and Roanoke City Public Schools, VA, both analyzed in this report. In addition to these exemplary school districts, two others that are members of the Minority Student Achievement Network (MSAN)—Farmington Public Schools, MI; and Cambridge Public Schools, MA—are profiled as well at the request of ACPS's inclusion of MSAN district members.

ANALYSIS OF THE EQUITY OF PEER AND EXEMPLARY DISTRICT POLICIES

Using the rubric outlined above, in the remainder of the section, Hanover analyzes basic commitment, instructional program, student, and school-community relations policies of a subsample of randomly selected peer and exemplary school districts. For every district profile, Hanover explores the extent to which each of the four dimensions of equity policy incorporates the six policy domains defined in GLEC's analytic tool. Scores ranging from 0 to 3 are assigned to each domain for all dimensions of equity. A summative score that adds these ratings is provided for every district followed with an in-depth discussion of the district's policies. Hypothetically, a district could receive a summative score of 0 (if no policies addressed any dimension of equity) or a top score of 108 (if all dimensions of equity are described to a great extent across all six policy domains).

SPRINGFIELD SCHOOL DISTRICT 186, IL

One of ACPS’s national peers, Springfield School District 186’s (SSD) School Board organizes district policies into eight sections. The four sections that correspond with those areas of policy for investigation include “School District Organization,” “Instruction,” “Students,” and “School Community Relations.” Together, these sections include seven, 55, 66, and 15 separate policy “Files.” After reviewing the extent to which these policies are framed in terms of equity, SSD received a summative rating of 50 (Figure 1.4). Each policy may be viewed [here](#).

Figure 1.4: Summary of the Equity of Springfield School District 186’s Policies

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	2	2	1	0
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	0	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	2	3	3	1
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	0	3	3	0
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	0	3	3	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	3	3	3	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	0	1	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	0	1	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	1	2	3	1
Summative Score: 50	8	18	22	2

RESOURCE DISTRIBUTION

On the whole, a close reading of SSD's policies sheds light on the district's stance towards sharing resources across schools and students. Most of SSD's legal references to the distribution of resources based on student need are made for students with disabilities, such as policy stipulations made in File 630.01 under the Individuals with Disabilities Educational Act. Legal information is also reviewed at length for homeless students and their enrollment in the district as reviewed in File 630.05. Non-legal context is further provided in File 127 under the district's policies for organization. One of the district goals outlined in this policy is to ensure the recruitment of educators and staff that can "address the needs of all students in accordance with Board policies." Another goal is to "[r]egularly assess the needs and allocate resources to support students, staff, and achievement." While these highlight the importance of providing all students with the resources they need to learn, they do not elucidate any further on the need to do so in order to level inequities among students that face historical disadvantages or special needs.

Several policy files provide more specific information about the types of resources provided to students that face disabilities or other disadvantages, including Files 630.01 through 635. As an example, students at risk of dropping out of school may be offered services ranging from counseling with social workers or psychologists; credit recovery, graduation incentive, or alternative placement programs; or services through community agencies, as listed in File 630.03. Yet, noticeably few policies detail the roles and responsibilities of the district or staff for monitoring and ensuring fair access to these resources. Perhaps the most relevant policy for accountability is listed in File 645.01 on instructional materials. According to this policy, **the Curriculum Council is responsible for approving of classroom materials that are "free from gender/gender identity, ethnic and sectarian biases."** Aside from the policy recorded in this file, however, SSD's policies tend to rarely refer to those accountable for ensuring equity in the use of the district's resources.

EDUCATION PROGRAMS

While nondiscrimination to programming is referred to in several policy files, the legal basis for which these practices are promoted is infrequently referenced. For instance, Files 600.021 and 600.022 overview the specific programs and activities aligned with gender non-discrimination policies but make no reference to Title IX legislation. Moreover, these policies lack a research-based perspective for ensuring equity in programming among student groups who face different barriers to learning. Nonetheless, SSD provides ample context to nondiscrimination, explaining the importance of doing so for ensuring fair educational opportunities. Policy File 115 explicitly states that **the district shall not make assignments and educate students with regard to "race, color, creed, national origin, gender (including identity), age, marital status, sexual orientation or disability, recognizing that students may be grouped for special educational purposes in order to meet particular student needs."** This policy also states that SSD will engage in continual review of the curriculum as a means to **"promote multi-culturalism and positive relationships" meanwhile encouraging "the cultural competence of all staff at all times."** In a separate policy filed under those for instruction (File 600.01), the School Board states that the district is "committed to the

concept of equal access to quality education for every student in the District regardless of race, creed, color, gender (including identity), national origin, sexual orientation or disability.”

With regard to the use of resources for equitable programming, SSD’s policy listed in File 115 specifies that all programs and activities must be made accessible to those with limited mobility, visual impairments, other disabilities, or language difficulties to the greatest extent possible. Perhaps the most expansive set of policies related to equity in educational programming are those that detail instruction and resources provided to students with disabilities (File 630.01), students who are identified as gifted and talented (File 630.02), and students at risk of dropping out (File 630.03). When explaining the rationale behind these policies, the School Board emphasizes the need to offer equal opportunities for all students across all schools. Although, the language of these policies leaves considerable room for interpretation. Policy File 600.03, for example, states that SSD will:

[...] provide substantially equivalent educational opportunities for its students at each building, including but not limited to the availability of educational materials and supplies, curricular offerings, and personnel. This policy shall be implemented so as to provide flexibility in meeting the unique needs of the District’s students.

Indeed, this policy does not specify how instruction, programs, or materials will be distributed among students with different needs nor how practices for equitable enrollment in such programs will be implemented. Instead, the School Board leaves room for the “flexible” use of the district’s resources and program offerings across schools to meet the “unique” needs of different student bodies.

For the most part, SSD’s policies clearly articulate accountability practices for equity in programming. Should students or other public community members take issue with the selection of instructional materials or a program’s curriculum, they may file an official complaint with a school principal as highlighted in File 645.03. However, this policy—or any other listed in a separate file—does not clearly establish a process for ensuring equity in programming across schools or student groups.

SCHOOL CLIMATE

While the assessment of equity in policies centered on school climate led to high ratings using the rubric, most of the policies reviewed focus on context rather than incorporating a legal or research perspective to positive school environments. For example, Files 116 and 600.02 reference Title IX compliance for nondiscrimination on the basis of gender; however, few other legal references are made to discriminatory protections by law. File 115 listed in the district’s organizational policies, on the other hand, lays the groundwork for providing equitable and inclusive educational environments. Foremost, **the district is prohibited from discriminating “against any employee or prospective employee, student, parent or any other citizen on the basis of race, color, creed, national origin, gender (including identity), age, marital status, sexual orientation or disability.”** Taken further, this policy states that the district shall “maintain an atmosphere conducive to the development of attitudes and skills

for effective cooperative living.” Here, SSD lists four objectives aligned with cultural competency and respect. These include:

- Respect for all individuals regardless of economic status, intellectual or physical ability, race, color, creed, national origin, gender (including identity), age, sexual orientation or marital status;
- Respect for cultural differences;
- Respect for the rights of others to seek and maintain their own identity;
- Respect for economic, political and social rights of others.

Further references to equity in school climate are made in File 120, in which equity is made part of the district’s overarching mission to educate and empower students “in a climate that promotes high expectations, strives to meet individual needs, and values diversity.” Safety and the wellbeing of all students are also reiterated in the social and emotional development goals listed in File 600.05.

These goals aside, several student policies acknowledge the importance of access to resources for sustaining equitable environments that serve the needs of all students. For example, in File 705.10, the School Board states that students who qualify for Title I supplemental services will be offered additional services if they attend a district that did not make adequate yearly progress. Many policies also provide a rationale or examples of maintaining equitable and safe school climates. Information about grievances against acts of discrimination on the basis of gender, for instance, are reviewed in File 116. Another policy included in File 625.04 recites rules for respecting student expression and perspectives when teaching controversial topics, while the policy listed in File 640.02 discusses grouping students for instruction “in an appropriate and comfortable learning situation.”

More extensively, however, policies listed in Files 635, 710.063, 710.065, 710.067, and 710.069 review in detail the district’s procedures for safety. This includes practices for: communicating with parents of Title I students to encourage stronger relationships between families and schools; student safety and protection from the use of alcohol; student safety from bullying and harassment; student protection from gang violence; and student protection from weapons. From the perspective of health and wellbeing, policies listed in Files 720.01 through 720.09 record procedures for student health care and social welfare. Accountability for the provision of such services and accountability of the district to actively support parents and the community are delineated in these policies and discussed in Files 800.01 and 810.

ACHIEVEMENT

At large, SSD’s policies seldom touch on strategies to eliminate achievement gaps. While SSD excludes mention of student achievement when reviewing the district’s main goals and educational objectives in File 126, the policy listed in File 127, however, deliberately makes the “achievement and opportunity gap” the focal point for educational improvement. Additional academic achievement policies reviewed in Files 655.06 through 655.15 review

rules for promotion and retention based on student performance but do not address gaps in or barriers to achievement. Subsequently, SSD policies would gain from further discussion of gaps in achievement and how to ensure that all students are provided with equitable opportunities to improve academic outcomes.

ALDINE INDEPENDENT SCHOOL DISTRICT, TX

Aldine Independent School District's (AISD) commitment to equity and achievement has been documented by several organizations. Education First, for instance, recently released a profile on AISD and the strategies the district has taken to address inequalities in achievement.⁴³ As it relates to this study, AISD's policies are organized into seven main categories. The sections that correspond to those for investigation include "Basic District Foundations," "Instruction," "Students," and "Community and Governmental Relations." Respectively, these sections include 10, 53, 63, and 22 separate policies, some of which are segmented even further into legal, local, and exhibit files. Upon analyzing the equity of the content of these policies, AISD has received a summative score of 47 (Figure 1.5). Each of these School Board policies may be reviewed [here](#).

⁴³ "Pursuing Equity for Two Decades (and Counting)." *Education First*. <http://education-first.com/wp-content/uploads/2016/03/DistrictsRising-Aldine-FINAL.pdf>

Figure 1.5: Summary of the Equity of Aldine Independent School District’s Policies

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	2	3	3	1
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	1	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	0	0	0	0
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	1	2	3	0
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	1	0	3	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	1	2	N/A	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	0	3	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	N/A	3	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	3	3	3	3
Summative Score: 47	8	16	19	4

RESOURCE DISTRIBUTION

While not AISD’s strongest equity dimension, several of the district’s policies emphasize the importance of maintaining fair access to resources and programming. From a legal standpoint, policies filed under “Instruction” and “Community and Governmental Relations” address equal access to district resources for all students. For example, Files FDA, FDB, FDC, and FDD include laws and policies centered on fair access to admissions and enrollment for inter-district transfers, homeless students, and military dependents. Nondiscrimination in

access to programs is more broadly addressed, however, in Legal Files FB and GA: **“No person shall, on the grounds of race, color, or national origin, be excluded from participation, be denied the benefits of, or be subjected to discrimination under any district program or activity. 42 U.S.C. 2000d.”** While these policies establish criteria for nondiscrimination and equal access to resources and programs, they do not delineate the importance of distributing resources equitably among students that face external challenges to education, nor do they provide a research basis for doing so.

AISD’s policies centered on the distribution and management of resources provide some context to the importance of student access; however, this context is minimal. Exhibit File AE, for example, simply states that AISD’s educational mission is to **“ensure that all Texas children have access to a quality education that enables them to achieve their full potential.”** While this mission statement is vague, the policy does go on to list 10 educational objectives and four district goals to ensure the offerings of high-quality opportunities. As it relates to equity in resources, several objectives mention the use of enhanced dropout prevention efforts to support attrition, initiatives to provide access to effective teachers and personnel, and the use of technology for meeting diverse learning needs. More specifically, Legal and Local Files EJ address the role of guidance and counseling services for providing “ongoing assistance to enhance the educational development of all students.” Additional guidance and counseling resources for students from socially disadvantaged backgrounds is not included in this policy, however, nor is equity mentioned in student access to these types of resources more broadly.

Accountability is made part of the district’s commitment to fair access and is outlined in several policies. Most notably, Legal File AIC holds the commissioner of education accountable for monitoring the use of financial resources and taking action when an excessive number of students are absent, placed in alternative education programs, and even when “a disproportionate number of students of a particular demographic group is graduating with a particular endorsement.” This policy, then, holds higher authorities accountable for monitoring the district’s engagement in fair practices across student subgroups.

EDUCATION PROGRAMS

Across most domains, AISD’s policies highlight equity in educational programming. Foremost, many policies filed under “Instruction” contain legal references to fair and equitable programming. Legal Files EF and EFAA make multiple references to legal codes on the use of instructional materials and fair access to all students. File EF also details the importance of informing parents of the types of materials used in class as well as the protection of student identity in data collected in class that disclose students’ political affiliation, mental health status, sexual behavior or attitudes, self-incriminating evidence, religious practices, income, and other background factors. Legal Files EHAA and EHBA provide further explanation of Common Core standards for learning as well as criteria for curriculum development for students with special needs.

Without reference to research-based strategies for equitable instruction or programming, some context is provided about the importance of cultural inclusivity. In reference to instructional materials, for instance, Local File EFA states that AISD “**shall provide a wide range of instructional resources for students and faculty that present varying levels of difficulty, diversity of appeal, and a variety of points of view.**” This policy goes on to list core objectives when selecting instructional materials, including those that represent “many ethnic, religious, and cultural groups and their contributions to the national heritage and world community.” Beyond cultural acceptance and inclusivity, some policies shed light on the use of resources to meet the instructional and programmatic needs of marginalized student populations. For example, Files EEH and EEL detail policies for the use of resources for homebound students as well as those for meeting the needs of special education students through collaborative partnerships.

Perhaps one of AISD’s strongest policy domains related to education programs is the extent to which policy adequately informs stakeholders about the rationale, purpose, and scope of its decision-making and practices. Local File EG notes that instruction is to be delivered through techniques that challenge all students to think more critically and at higher levels. However, this policy does not address the importance of doing so for students that have historically been exposed to less rigorous instruction in the past and ensuring their fair access to programs. This limitation aside, AISD’s School Board includes 16 separate files (Files EHBAB through EHBL) that review eligibility and offerings for students with a wide range of learning needs. For example, File EHBAA notes that AISD “shall ensure that all children residing within the district who have disabilities, regardless of the severity of their disabilities, and who are in need of special education and related services are identified, located, and evaluated.” As it relates to students from disadvantaged groups, file EHBD explicitly addresses the importance of using Title I funds to diminish barriers to learning and to support parental engagement “**with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background.**” In accordance with accountability, Legal File EHBAB describes in detail the responsibilities of the Admission, Review, and Dismissal (ARD) committee for overseeing placements in special programs and ensuring fair access.

SCHOOL CLIMATE

Equitable practices for maintaining welcoming and inclusive school climates are largely discussed in student policies. Nondiscrimination laws form the legal core of these policies. Most notably, Legal File FB under student policies consists of eight pages of federal and state laws prohibiting the discrimination of students on the basis of “**race, religion, color, sex, or national origin.**” More specifically, educators are prohibited from using these identifiers as a means to exclude students from participating in educational programs or receiving federal funding. File FB also states that the district “**shall not coerce, intimidate, threaten, retaliate against, or interfere with any person who attempts to assert a right protected by the above laws or cooperates with investigation and enforcement proceedings under these laws.**” Aside from the legal aspects to these policies, some research basis is attributed to equity in school climate as well. Local File FFA states that the district shall “consider evidence-based

strategies and techniques” for supporting students’ health and wellness. Ensuring equity in the implementation of these practices, specifically for students who may lack wellness resources outside of school, is not discussed, however.

While AISD’s policies do not provide any context about the district’s school climate directly, many policies address the importance of student safety and wellness for maintaining safe, positive, and engaging school climates. As noted in Legal File FDE, for example, the policy states that the state education agency “shall establish and implement a statewide policy requiring that a student be allowed to attend a safe public elementary or secondary school.” In a similar vein, Local File FFA discusses the importance of establishing a high-quality health and wellness program. More specific to student behavior, Legal File FNA acknowledges the importance of students’ self-expression, stating that “[S]tudents do not shed their constitutional rights to freedom of speech or expression at the schoolhouse gate. At school and school events, students have First Amendment rights, applied in light of the special characteristics of the school environment.” To this end, the district must respect the expression of all students with different cultural identities and backgrounds.

Many policies related to school climate are educative about their purpose, with added examples of their violations. Legal File FFAE, for instance, discusses the importance of designing a cooperative health care program to reduce student absenteeism, increase all students’ academic potential, and stabilize the wellbeing of each student. Files FFAA, FFAB, FFAC, FFAD, and FFB provide further detail on steps to ensure student access to health exams, immunizations, medical treatment, and crisis intervention supports. Perhaps the most relevant policies related to school climate, however, are those that address student freedom from discrimination and bullying (Files FFH and FFI). In Local File FFH, the policy states that the district “**prohibits discrimination, including harassment, against any student on the basis of race, color, religion, sex, gender, sexual orientation, national origin, disability, age, or any other basis prohibited by law.**” Examples of such discrimination and investigative procedures are then illustrated in the remainder of the policy. In Local File FFI, AISD defines bullying and procedures for investigating violations to bullying policy. Additional stipulations are made in files FNCC, FNCD, FNCE, FNCF, FNCG, and FNCH which review policies against hazing, drugs, alcohol use, weapons, and assault.

As with most districts, AISD clearly articulates policies for accountability in relation to instances of discrimination. Specifically, Local File FB outlines the roles and responsibilities of the district and key personnel accountable for ensuring nondiscrimination, equal protection, referrals, consent, and due process in the reporting of any violations to laws against discrimination. Exhibit File FB also lists the names and contacts of the administrators tasked with coordinating efforts to comply with nondiscrimination laws.

ACHIEVEMENT

Reducing gaps to achievement and supporting the achievement of historically disadvantaged groups are not key goals outlined in AISD’s policies. AISD has 10 policies that focus explicitly on student achievement, performance acknowledgment, grading, and other

processes and practices for student advancement (these include policies listed under Files EI through EIF). None of these policies, however, identify gaps in achievement, the importance of measuring these gaps, or taking action to eliminate inequalities in student outcomes. Legal File AID touches on standards for accountability as defined in the Every Student Succeeds Act; nevertheless, it is unclear how these standards are applied to ensure the success of all students regardless of identity or background.

Accountability for student achievement is perhaps the most central to policies that center on these areas. Legal File AIB details the accountability on the part of the district to report performance data segmented by student subgroups. Clear descriptions of the types of data included in performance reports, publication processes, report uses, distribution practices, and additional rules for accountability compliance are reviewed in detail.

ROANOKE CITY PUBLIC SCHOOLS, VA

Roanoke City Public Schools (RCPS) recently received media attention for its equity-focused policies.⁴⁴ As reported by *The Roanoke Times* last winter, Norfolk Public Schools had considered adopting an equity policy based on RCPS's School Board policies.⁴⁵ Most notably, RCPS monitors and reports student performance across different student subgroups and schools in an "Equity Scorecard."⁴⁶ Overall, the School Board sorts district policies into 11 categories, four of which include "Foundations and Basic Commitments," "Instructional Program," "Students," and "School-Community Relations" sections. In total, these sections are composed of 7, 54, 73, and 30 separate files, respectively. After analyzing the extent to which these policies incorporate an equity lens, RCPS received a summative rating of 46 (Figure 1.6). Hanover discusses the analysis of these policies in greater detail below, each of which may be viewed [here](#).

⁴⁴ Gregory, S. "Norfolk schools consider equity policy based on Roanoke's." *Roanoke Times*, January 5, 2016. http://www.roanoke.com/news/education/norfolk-schools-consider-equity-policy-based-on-roanoke-s/article_98d69a9e-7625-5433-bac5-547fb045c735.html

⁴⁵ Ibid.

⁴⁶ An example of this scorecard can be found here: "Roanoke City Public Schools – Equity Scorecard, School Year 2014-2015." Roanoke City Public Schools. https://www.rcps.info/UserFiles/Servers/Server_468571/Image/Roanoke%20City/Community/Equity%20Scorecard%20December%202015.pdf

Figure 1.6: Summary of the Equity of Roanoke City Public Schools

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	1	0	3	0
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	0	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	2	2	3	0
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	1	1	3	2
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	0	0	3	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	2	3	1	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	2	1	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	2	1	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	3	0	3	1
Summative Score: 46	13	8	22	3

RESOURCE DISTRIBUTION

Among RCPS’s policies that address equity in access to resources, the district provides little to no legal- or research-basis. That is, very few references are made to federal or state laws for the equitable distribution of resources nor are references to research made that address the importance of doing so to support the learning and achievement of historically disadvantaged groups of students. Albeit, several policies provide context about the importance of student access to resources. Most of these policies, however, focus only on

students with disabilities. In File ACA, for example, RCPS is required to provide **“facilities, programs, and activities that are accessible, usable, and available to qualified disabled persons [as well as] free appropriate education at elementary and secondary levels, including nonacademic and extracurricular services and activities, to qualified disabled persons.”** Similar background is provided in File IGBA which explains the importance of individualized education for students with disabilities.

In addition to these policies, several skim the importance of providing learning opportunities unique to the needs of each student. The policy listed in File AE makes the district’s stance clear for supporting students who differ in their backgrounds and learning needs:

Roanoke City Public Schools is committed to excellence in education, equality of educational opportunity, and the recognition of each student’s commonality as well as individuality. **Inasmuch as students differ in their rate of physical, mental, emotional and social growth and vary in their needs and abilities, learning opportunities are provided that are consistent with personal development and potential.**

The district’s policy listed in File IGBH is similar in that it outlines RCPS’s use of alternative programs for “meeting the needs of all students.” However, both policies in Files AE and IGBH offer few details that explain how these resources or programs are to be accessed by students with special needs. Nonetheless, Files IGBEA, IGBF, and IGDA that include policies on the district’s remedial recovery program, programs for English language learners, and student organizations help to establish criteria for student enrollment in special programs or opportunities for enrichment. In fact, File IGDA states that students cannot be discriminated against “on the basis of the religious, political, philosophical, or other content of [their] speech” when participating in enrichment programs or student meetings. However, few examples are provided that detail violations of these policies.

In terms of accountability, policies listed under File IGBC hold the district responsible for ensuring that both students and parents are aware of access to needed resources. More specifically, this file specifically calls attention to keeping parents informed about special programming, including parents of students with a Title I status or who have limited English proficiency.

EDUCATION PROGRAMS

Similar to policies on student access to resources, those that delve deeper into educational programming provide little insight on the laws or education research verifying the importance of equity in offerings. Most legal references to educational programs and instruction are made as separate citations at the end of a file, and rarely are these law described in detail. Rather, RCPS’s policies are framed in a broader context as they respond to the general programming needs of various student groups. File IA, for example, acknowledges the importance of equity in instruction and education programs, specifically as it relates to those with disabilities, gifted students, students with difficulty meeting learning standards, students with limited English proficiency, and those who are at risk. **Policy outlined in File IB adds that**

the district must educate students in a “democratic tradition” in which students may “express their beliefs about religion in homework, artwork, and other written and oral assignments free from discrimination based on the religious content of their submissions.”

While these practices are important for implementing programming and instruction that is inclusive to the perspectives of students, neither policy explicitly addresses how they are informed by the disadvantages some groups of students have historically faced.

When analyzing the content of RCPS’s policies, several emphasize the specific resources needed to deliver equitable programming. Files IGBA, IGBB, IGBF, and IGBE list a number of procedures for screening and making special program placements for students with disabilities, gifted abilities, limited English proficiency, and those who may require extended learning or remedial education, respectively. File IGBG also ensures fair access to instruction and district resources among students that are homebound. Finally, File KA under policy for school-community relations, articulates the importance of regularly communicating with parents about programs and planning. These attributes aside, policies on equity in programs and curriculum planning notably lack a rationale for and examples of cultural inclusivity and sensitivity to the needs of diverse students. File IF, which states policy on curriculum development and adoption, does not acknowledge the importance of ensuring access to culturally inclusive programming. Files IIA, IIAA, and IIAB on the selection of instructional materials also exclude this language for ensuring that all students and educators have opportunities to select material that is inclusive. Only policy described in File IIAB states that “[m]aterials used by students under the guidance of teachers to extend, expand, and supplement basal materials constitute an integral part of the instructional program.”

Ultimately, schools are responsible for making decisions about the use of classroom materials and programming. Yet, rarely do RCPS’s policies address the parties responsible for ensuring equitable access to instruction and programs. For instance, in File INB, the district includes the following policy on the teaching of controversial subjects: “The preparation for effective citizenship includes the study of issues that are controversial. Such study will be carried out in an atmosphere free from bias, prejudice, or coercion.” No mention is made, however, about how such content is to be delivered or which personnel are responsible for monitoring such instruction.

SCHOOL CLIMATE

Under File AC in the district’s foundational policies, RCPS makes six legal references to the district’s nondiscrimination policy, the core of which describes the School Board’s commitment to:

[...] nondiscrimination with regard to sex, gender, race, color, national origin, disability, religion, ancestry, age, marital status, genetic information or any other characteristic protected by law. This commitment will prevail in all of its policies and practices concerning staff, students, educational programs and services, and individuals with whom the Board does business.

Indeed, extensive legal references are made as well to the district's policy against harassment included in File JFHA (including Title IX legislation).

Legal references aside, many of RCPS's policies provide in-depth descriptions of the district's stance on nondiscrimination and student safety as well as equity in promoting parental involvement to support students' educational experiences. In File AE under the district's policies on basic commitments, the School Board states that the **"school environment should be responsive and conducive to learning [...] A responsive environment includes competent, dedicated teachers using a variety of techniques and a classroom atmosphere where students can function and develop according to their abilities."** File AD, which recites the district's educational philosophy, also notes that the School Board shall treat **"all members of the school community equitably with the highest degree of respect."** Taken further, Files JB, JFB, JFC-R, and JHCF record policies on equal educational opportunities and nondiscrimination, student involvement in decision making, standards for student code of conduct, and student wellness. Under File JB, for example, the district states that:

Equal educational opportunities shall be available for all students, without regard to sex, race, color, national origin, gender, ethnicity, religion, disability, ancestry, or marital or parental status. Further, educational programs shall be designed to meet the varying needs of all students.

In a similar vein, instructional policies IGBC and IKA highlight RCPS's stance on supporting parents and their involvement in educational practices and decision making, particularly those of children eligible for Title I funding or of limited English proficiency.

While the district provides immense background on nondiscrimination and equal protection, little detail is offered on how resources will be shared fairly and equitably to maintain a safe and positive school climate. That is, students identifying with historically marginalized or disadvantaged groups may require additional resources or opportunities to encourage their inclusion in the school community. **Yet, File JB is the only file to include a policy that addresses the differential provision of resources for sustaining equitable school environments.** As listed in this policy, the School Board is responsible for providing "facilities, programs and activities that are accessible, usable and available to qualified disabled persons." There is no mention of securing additional resources for nondisabled students that face other inequalities.

While clarification about the provision of resources for maintaining an equitable school environment is needed, on the other hand, a number of policies do list the procedures for ensuring nondiscrimination, student safety, and wellbeing. Files JFC-R, JFCB, and JFCD through JFCI report regulations for student code of conduct; student ethics and integrity; and the prevention and sanctions against the use of weapons, gang activity, drugs, and other substances. In other examples, policies listed in Files JHCA through JHCF clarify the steps the district will take to ensure students' health and wellness and equal protection for those with health complications. Several key policies hold the district accountable for providing these services and for maintaining student safety at large. As noted in File AE, student "[s]afety, physical comfort, and appearance [...] are vital environmental components." To protect students, File JB lists the procedures for reporting discrimination and those responsible for

overseeing these reports. File JBA extends this policy and reviews the process for addressing complaints and grievances regarding the discrimination of students with disabilities. Likewise, File JFHA lists the actions taken to address acts of harassment and retaliation.

ACHIEVEMENT

Overall, little attention is made to eliminating gaps in achievement and student outcomes. Policy that recognizes the need for a strategic plan as outlined in File AF states that, as part of the RCPS’s learning objectives, the district must focus on improving student achievement, “particularly the achievement of educationally at-risk students.” However, this policy does not list gaps specific to any student groups, including students of color and those from low-income backgrounds. Policy outlined in File IA states that the district shall formulate a “plan to make achievements for students who are educationally at risk a division-wide priority that shall include procedures for measuring the progress of such students.” Thus, the district is held accountable for developing a plan that targets the achievement of students who are missing performance targets. However, the policy lacks clarity in its description of these strategies and their importance for eliminating inequalities in achievement.

FARMINGTON PUBLIC SCHOOLS, MI

The Farmington Public Schools (FPS) Board of Education organizes district policies according to eight categories; only three of these include policies related to ACPS’s sections of interest: “Instruction” (21 files), “Students” (74 files), and “Community” (53 files). FPS does not include a policy section similar to that of foundations and basic commitments. Based on Hanover’s scan of all 148 policies, FPS has received a summative score of 39 (see Figure 1.7). Online web-links to all of FPS’s School Board policies may be found here.⁴⁷

⁴⁷ All references to policy articles listed in the profile may be found at the following site unless otherwise noted:
“Board of Education: Policies and Procedures.” Farmington Public Schools.
<https://www.farmington.k12.mi.us/Page/164>

Figure 1.7: Summary of the Equity of Farmington Public Schools’ Policies

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	3	1	3	0
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	2	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	0	2	2	0
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	0	0	2	0
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	0	0	0	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	2	1	1	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	3	2	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	3	1	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	0	2	3	0
Summative Score: 39	11	9	19	0

RESOURCE DISTRIBUTION

Among the six domains of policy equity, policies that outline the distribution of materials, personnel, support services, facilities space, and other resources for learning are predominately discussed in a legal and educative manner. For instance, article 6330 under FPS’s instruction policy delineates all district procedures for the fair and legal use of Title I funds for students that qualify. Articles 5112 and 5119 also provide some legal context to the distribution of resources: Article 5112 addresses the nondiscrimination of homeless students

and their eligibility to enroll in the district's schools as defined by No Child Left Behind (NCLB), while Article 5119 describes Michigan law for the eligibility of students' use of transportation services. Beyond these legal criteria, FPS's policies pertaining to the distribution of resources sufficiently inform stakeholders about the purpose, scope, and decision-making procedures for the equitable use of such resources. Foremost, Article 5180 outlines all procedures for students that are interested in choosing a select school within the district so that students have the opportunity to enroll in a school that may better fit their needs. For example, this policy states:

Based upon the Board's approval of the Intra-District School of Choice Study Committee recommendations and in accordance with Board Policy #5180, the District will continue to offer choice to its resident students. However, **to support the District's goal of excellence and equity for all students, the granting of choice is balanced with the need to provide an equitable and appropriate utilization in all of our school buildings.**

This article continues to outline all the regulations and procedures for making decisions in response to students' preferred school requests. In sum, these steps "allow the District to provide for equity in programs and equal opportunity for all students regardless of which school building they attend." While these policies are clearly articulated throughout the article, they do not provide any research basis for their inclusion nor do they specify clear procedures for accountability.

EDUCATION PROGRAMS

On the whole, FPS's policies for instruction and students briefly provide information on the fair and equitable access to high-quality curricula and extracurricular activities to enhance student engagement. From a legal perspective, Article 6120 mentions the district's use of Michigan's Curriculum Framework Standards and Benchmarks to guide the curriculum, but does not provide any further legal context with which all students are to have access to rigorous curricula. Some context for equity in student access to programming, however, is provided in Article 5126, which "recognizes the need for schools to engage in activities that complement the District's curriculum and the diverse interests and talents of its student population." Yet, this article does not specify which activities will be offered by the district to meet the interests of diverse student groups. Rather, it only states that "[s]tudents are to be encouraged to achieve in all areas of school life as well as in endeavors which enhance the curriculum." On the other hand, Article 5175, which outlines policies related to extracurricular offerings, acknowledges that "[d]uring non-instructional time, **no group of students will be denied an opportunity to meet because of religious, political, philosophical, or other viewpoint related tenets of the group.**"

A few articles under student policy describe processes for accountability to ensure that students are, in fact, being held to rigorous learning standards and opportunities. Article 5120, for example, mentions that all district professional staff are:

[...] directed to devise and maintain a variety of assessments and reporting formats that demonstrate student academic achievement and progress toward the

characteristics of the Student Profile as described in the Farmington Curriculum Framework. Teachers will assist students in the development of individual assessments which showcase evidence of their knowledge, skills and growth including demonstrated achievement of core curriculum standards.

In another example, Article 6120 under instruction policy states that “[i]t is the responsibility of teachers and administrators to guide and counsel all students and present core curriculum based on research and best practice. Academic excellence shall be emphasized and encouraged.” Nonetheless, no articles that outline district practices for accountability emphasize the importance of doing so for any student groups in particular, nor do any policies support the importance of programming equity with research.

SCHOOL CLIMATE

A number of articles and procedures for maintaining an equitable, positive, and safe school climate are filed under policies for students, and many of these address the six domains of policy equity to some extent. Articles 1260, 5125, 5125.1, and 5125.3, for instance, list all legal procedures for collecting student data and securing records for student safety. Other legal procedures for student safety, including safety drills and facilities maintenance, student medication use, prevention of communicable diseases, and food allergy protection are described in separate articles (Article 5155 lists laws specific to child protection procedures). Article 5150 is perhaps the most critical for addressing equity and refers to those laws that outline student nondiscrimination and procedures for complaints of discrimination. Student identities referred to in this policy include **“race, color, religion, national origin or ancestry, sexual orientation, gender, age, disability, height, weight or marital status.”**

Aside from meeting legal criteria, several policies provide a research-basis and/or greater context for understanding the importance of maintaining a positive and safe school environment for all students. For example, policies on bullying use comprehensive definitions to define bullying (Article 5131.3) and include the latest definitions of cyberbullying to address its prevention. In Article 5131.4, some context is provided about the importance of student expression: “[s]tudents have the opportunity to express themselves in ways which do not interfere with nor create a substantial disruption to the educational process.” Some attention is also given to policies on wellness. For example, Article 5141.6 notes that FPS “is committed to creating a healthy school environment that enhances the development of lifelong wellness practices to promote healthy eating and physical activities that support student achievement.” Additional policies for safety are described in detail in Articles 1234, 1235, and 1251 included in FPS’s “Community” section.

One area of school climate in which FPS may benefit from stronger language refers to those policies on the importance of family and parent involvement in children’s education. While Articles 1311 and 1311.1 address procedures for handling parental concerns and Article 6329 discusses parent or guardian involvement in support of school-wide planning, minimal information is provided about the importance of this involvement or the steps educators can take to help engage parents. Article 5122.1 similarly states that “[s]tudents and

parents/guardians are encouraged to become involved in making those curricular choices that will be of greatest benefit to the individual student.” However, no mention of how this decision is to be made within the context of the school’s offerings is provided. Consequently, FPS’s policies are unclear regarding how the district will encourage parental involvement and reduce barriers to this involvement.

ACHIEVEMENT

Hanover did not identify any specific articles under policies for instruction and students that directly address indicators for student achievement or eliminating barriers to achievement. However, in a subsequent review of FPS’s website and publically available documents, the district demonstrates an overall mission to increase student achievement and reduce gaps as described in the District Improvement Plan. According to this plan:

The District’s mission statement was updated and strengthened by adding the commitment to ‘engage every student’ in quality learning experiences empowering ‘each student’ to become ‘thoughtful, contributing citizens in a changing world.’ A new vision statement was also developed and is guided by the overarching commitment to ‘high achievement for all students where learning is our most important work.’⁴⁸

In further review of the district’s online materials, FPS includes a webpage specifically devoted to “Instructional Equity.”⁴⁹ According to the information provided, FPS reiterates its mission to create equitable language programs for students learning English as a second language. A variety of tiered English classes are offered to students who vary according to their language ability and proficiency. Moreover, extensive training is offered to educators with the English Language Department “intended to enable teachers to include bilingual students in classroom activities, taking into consideration their language backgrounds and varying abilities.”⁵⁰

CAMBRIDGE PUBLIC SCHOOLS, MA

The Legal Counsel Department at Cambridge Public Schools (CPS) provides a number of documents that outline all district and school policies on the “CPS Policies and Procedures” webpage. While CPS’s policies are also provided via a separate online server,⁵¹ the Legal Counsel Department includes an alphabetical list of approximately 109 select policy files as well as a downloadable document titled *2016-17 Guide to Policies for Students and Families*, a guidebook that summarizes policies and procedures for students. Using these resources, Hanover conducted a comprehensive analysis of the district’s policies most relevant to foundations and basic commitments, instruction, students, and community relations. Overall,

⁴⁸ “District Improvement Plan.” Farmington Public Schools, October 8, 2015. p. 13.

http://www.farmington.k12.mi.us/district/school_improvement/district_sip_1516.pdf

⁴⁹ “Curriculum: Instructional Equity.” Farmington Public Schools.

http://www.farmington.k12.mi.us/curriculum/instruction_equity.php

⁵⁰ Ibid.

⁵¹ “Online Policy Manual.” Cambridge Public Schools.

<http://z2policy.ctspublish.com/masc/Z2Browser2.html?showset=cambridgeset>

CPS received a summative score of 69 using the rubric (see Figure 1.8). Online web-links to all of CPS’s policies may be found [here](#).⁵²

Figure 1.8: Summary of the Equity of Cambridge Public Schools’ Policies

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	3	3	3	0
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	2	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	3	3	3	3
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	3	3	3	0
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	3	3	3	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	0	2	0	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	3	3	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	2	3	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	0	3	3	3
Summative Score: 69	17	23	23	6

⁵² All references to policy articles listed in the profile may be found at the following site unless otherwise noted: “CPS Policies and Procedures.” Cambridge Public Schools. http://www.cpsd.us/departments/legal_counsel/c_p_s_policies_and_procedures

RESOURCE DISTRIBUTION

CPS's policies that outline the distribution of and access to the district's resources and facilities provide in-depth background information about the district's goal to serve historically underrepresented student groups. One file that outlines this aim is CPS's Controlled Choice Plan, a 26-page document that explains the district's "core values of academic excellence and social justice for all students" and the procedures for "providing equal access to an array of highly attractive, excellent quality schools." Notably, the Plan incorporates a detailed description of the racial and income composition of CPS's student body and the progress the district has made in the last decade to ensure more racially and socioeconomically balanced schools. In addition to providing this information, the Plan is transparent in its description of a variety of factors used to make student assignments to programs and schools:

The CPS will use a variety of diversity factors and assignment preferences in assigning students to schools and programs [...] The diversity factors and assignment preferences include Socioeconomic Status, Siblings, Proximity, Special Education Status, English Language Learner Status, Gender and Language Dominance. **The CPS believes that the use of a range of diversity factors and assignment preferences will result in a multi-faceted diversity in each school that will provide all students with equitable educational opportunities and with improved achievement.**

Each of the identities described above are defined in significant detail (at least one paragraph used to define each) throughout CPS's Plan. Aside from ensuring that all students have equitable access to schools and resources, a separate policy listed under File IJOA notes that no student will be denied access to participate in field trip opportunities because of a financial inability to pay trip dues. Other policy files incorporate relevant legal language to describe students' access to resources, including Files JFABD and EEAA, which disclose homeless students' rights to services provided by the district and rights to transportation services. These policy criteria aside, the district is limited in its description of accountability and oversight for ensuring the provision of more specific materials and resources for select student groups, particularly those who have faced historical disadvantages.

EDUCATION PROGRAMS

CPS's policies exhibit many references to equity and fairness across nearly every policy domain recorded in the rubric for those policies addressing education programming. From a legal perspective, multiple references to state and federal law are made in File JB, which describes the protection of all students and their right to participate in all educational opportunities afforded to them. Files GBGAA/JLCCA, ACE, ACA-1, ACA, and ACAB also address the legal protection and nondiscrimination of all students on the basis of health (i.e., those living with HIV/AIDS), disability, gender identity, and sex, among other characteristics, respectively, all of whom have the same rights and access to programs as any other student group. Accordingly, policy under File JB states that:

In recognition of the diversified characteristics and needs of our students and with the keen desire to be responsive to them, the School Committee will make every effort to protect the dignity of the students as individuals. It also will offer careful

consideration and sympathetic understanding of their personal feelings, particularly with reference to their race, color, sex, religion, national origin, ethnicity, gender identity, sexual orientation, and disability.

As it relates to the delineation of resources for equity in programming, CPS's policies under File JRA-1 note that all students should have access to information and guidance to help them plan for their education and postsecondary options. However, the policy does not explicitly mention how such resources are to be distributed to students with various identities and backgrounds. Regardless, CPS's Controlled Choice Plan specifically calls attention to the strategies in place to ensure that all students are offered "excellent quality schools which offer students the benefits of learning alongside and engaged with a diverse group of students." Beginning in 2013, **the Plan states that administrators and other professional staff must work to design or make changes to programs that are "under chosen" by students in given socio-economic categories or other "under-represented groups."** As such, the "Superintendent will monitor the implementation of this plan, including the effectiveness of the new programs in accomplishing the goals of this Plan and improving educational outcomes for students."

Similarly, File IHBE also "recognizes the importance of establishing an environment for second language learners that celebrates diversity and learning" in which the district offers "a comprehensive, system-wide plan for the education of English Language Learners is designed and implemented." According to CPS's policy, the Superintendent is responsible for monitoring the representation of different student groups in programs that have historically been underrepresented and for developing "administrative guidelines defining strategies to create and maintain strong family connections and involvement" in the programs offered by the district.

SCHOOL CLIMATE

Similar to the district's policies on programming, CPS's policies referring to factors that impact school climate are, to a large extent, equitable. Foremost, CPS addresses nondiscrimination on the basis of sex, gender identity, and disability status in Files ACA, ACA-1, and ACE with detailed references to federal law. Affirmative Action Policies under File AC provide a full account of all the laws that support the "policies and practices established to remedy the under representation of people of color, women, and other underutilized groups [...]" Aside from taking action to ensure that the school's educators are representative of the student body's diversity, policies under File JICFB refer to several laws to prevent bullying and discrimination on the basis a wide range of characteristics and identities. Likewise, policies under File JICFB provide comprehensive and up-to-date definitions of bullying. In fact, File JICFB-1 consists of a four-page document that recounts immense details of the issues surrounding cyberbullying, the harm it can do to a victim, and the seriousness with which the district takes to prevent and respond to allegations of cyberbullying.

In addition to these legal and research-based frameworks, **the district provides a lengthy description of its commitment to "equal education opportunity" and the importance of**

providing students with a “multicultural education” in File AC. Subsequently, CPS makes clear its stance on affirmative action to **“provide sufficient role models among the staffs who reflect the various racial and cultural backgrounds of the students.”** This file adds that efforts will be made to ensure that no student faces discrimination or harassment on the basis of “race, color, national origin, ethnicity, sex, religion, age, sexual orientation, disability, veteran, genetic information, gender identity, or marital status.” Moreover, policies listed under File EFK note that CPS “recognizes the relationship between student well-being, health and wellness and student achievement as well as the importance of a comprehensive district wellness policy” for promoting healthy environments for all students.

Beyond this more general set of equity goals, taken together, Files JLCD, JICA, JIFC, JICFA-E, JICFA-E-1, JRA, and JRA-2 provide a comprehensive set of regulations and guidelines for medication and food allergy safety, dress code and student self-expression protection, prevention of gang activity, sanctions for hazing violations, rejection of hate crimes, and protection of student records, respectively. An extensive number of measures that are taken to address acts of bullying and/or discrimination are also stipulated by the district in File JICFB. Personnel responsible for taking action as well as accountability procedures are also described in this file with the aim of ensuring victims’ safety and wellbeing.

ACHIEVEMENT

While equity in student achievement policy is not stipulated in a legal or research-based framework, policy outlined in File IK clearly states the district’s mission on student achievement, stating that the “philosophy of the School Committee concerning academic achievement, as well as children’s social growth and development, is based on the premise that **children have diverse capabilities and individual patterns of growth and learning.**” Providing further detail of this overarching mission, the policy under File IK adds that all teachers must strive to understand the needs of each individual student, adapting an education plan that meets those specific needs. This policy concludes by listing six requirements for communicating and reporting students’ progress towards achievement so that both students and their parents are kept informed of students’ learning.

SECTION II: ANALYSIS OF ACPS POLICIES AND RECOMMENDATIONS FOR ENHANCEMENT

In the following section, Hanover evaluates the extent to which ACPS’s policies address the four dimensions of equity. Following this analysis, Hanover draws comparisons between ACPS’s policies and those analyzed in Section I above, offering insight for policy enhancement.

THE EQUITY OF ACPS’S POLICIES

Overall, the ACPS School Board organizes the district’s policies under 11 main section headings, four of which are labeled “Foundations and Basic Commitments,” “Instructional Program,” “Students,” and “School-Community Relations.” In total, 183 policies are filed under these sections—six are listed under basic commitments, 73 under instructional program policies, 71 under student policies, and 33 under school-community relations. The equity of all 183 policy files has been analyzed and coded using GLEC’s rubric. Figure 2.1 on the following page presents a breakdown of ACPS’s summative rating for policy equity, a score of 45. Hanover discusses key findings from this analysis below.

Figure 2.1: Summary of the Equity of Alexandria City Public Schools’ Policies

POLICY DOMAINS	POLICY DIMENSION RATINGS			
	RESOURCE DISTRIBUTION	EDUCATION PROGRAMS	SCHOOL CLIMATE	ACHIEVEMENT
Legal				
<ul style="list-style-type: none"> To what extent does the policy satisfy/meet relevant legal mandates? 	1	0	3	0
Research-Based				
<ul style="list-style-type: none"> To what extent does the policy reflect principles derived from scholarly research that will likely bring about effective outcomes for all students? 	0	0	0	0
Responsive to Context				
<ul style="list-style-type: none"> To what extent does the policy respond to the current district/school context and issues? 	2	2	3	1
<ul style="list-style-type: none"> To what extent does the policy enumerate specific student groups to be responsive to students who have been historically marginalized in school settings? 	0	0	3	0
<ul style="list-style-type: none"> To what extent does the policy address disparities in treatment between and among student groups (i.e. disproportionality in participation and outcomes of particular student groups)? 	0	0	3	0
Efficient				
<ul style="list-style-type: none"> To what extent does the policy provide or call for, the development of procedures that delineate use of personnel, time, financial, and other resources? 	2	3	1	0
Educative				
<ul style="list-style-type: none"> To what extent does the policy adequately inform stakeholders about the rationale, purpose and scope of its application for appropriate decision-making and practice (i.e., afford and constrain decision making)? 	2	1	3	0
<ul style="list-style-type: none"> To what extent does the policy provide examples of behaviors that demonstrate violation of the policy and examples of behaviors demonstrating compliance? 	2	0	3	0
Accountable				
<ul style="list-style-type: none"> To what extent does the policy specify responsibilities and provide clear lines of accountability? 	3	1	3	3
Summative Score: 45	12	7	22	4

RESOURCE DISTRIBUTION

The equitable distribution of resources is primarily addressed in policies for instructional programs, and many of these exclude *legal references* or *references to research* in support of equitable practices. In most cases, legal references are made at the conclusion of policy files, as is the case in File JECA, which specifies the enrollment and provision of resources for students that are homeless, for example. Nonetheless, several instructional program policies provide some context about the equitable provision of division resources. File IGBJ, which

addresses policies for academic excellence and educational equity, for instance, states that the “School Board will provide leadership and resources that support constructive and life-affirming educational outcomes for our students. Through an individualized approach to monitoring students’ interests and progress, ACPS will build on the strengths and gifts of each student.” Here, the division recognizes the importance of providing resources to students to meet “individualized needs.” However, no further details are provided about how such resources will be distributed to groups of historically marginalized students in the pursuit of educational equity.

Beyond this context, several files delineate steps for the distribution of resource (i.e., *policy efficiency*). For example, File IGBGA-R enumerates policies for students’ enrollment in and the delivery of the ACPS Online Learning Program. The policies state that ACPS will “[p]rovide students with required supplemental course materials if applicable.” Aside from online learning opportunities, policies under File IGBH establish a set of criteria for proposing the use of the division’s resources for the implementation of alternative school programs: “When ACPS determines that students with special needs require special programs, the School Board may establish alternative programs within existing schools or at separate sites that are within the jurisdiction of the school division.” While these policies indicate the division of resources for specific programs, they provide few details that explain which and how such resources are to be distributed to students that use these services. More specific criteria for the distribution of resources are, however, touched on in Files IHB-R and IICA as they outline regulations for caps on class size and providing students access to field trips (including those who may lack available funds).

Several of ACPS’s policies are *educative* about the rationale and purpose for equity in the distribution of resources. Under File JC–R/JCD-R, students may choose to select into a school for programmatic transfer. However, this policy does not frame program transfer opportunities as critical for equitable access to resources and programs. To a similar extent, File IGBJ stipulates that “[a]ccess to educational programs, services, and opportunities does not depend on eligibility criteria other than those prescribed by ACPS policies, or local, state, or federal law.” While this policy recognizes nondiscrimination in access to education, it does not make explicit the scope nor the importance of providing equitable access to resources to students on the basis of identities that have faced historical disadvantage. Further clarification, on the other hand, is provided in another set of policies included in File IGDA, which states rules for membership with student organizations:

Student organizations may establish academic qualifications for membership where necessarily related to the purposes of the organization. Student organizations shall not deny a student membership on account of his or her race, color, national origin, or religion. An organization may only impose membership qualifications based on sex where based on competitive athletic skill or where the activity involved is a contact sport. However, **membership shall not be denied solely on the basis of gender identity, gender expression, or sexual orientation.**

Here, nondiscrimination is made more readily apparent in access to student organizations on the basis of specific identities.

Beyond these domains, several of ACPS’s policies delineate clear plans of **accountability** to ensure that all students are provided with equitable access to important information and resources. File IGBC, which lists policies for parental involvement, names six division responsibilities to confirm that parents of students who receive Title I funds have access to materials and training necessary for fostering the academic growth of their children. In addition, the policies outlined in File IIA state that an evaluation committee is responsible for reviewing the selection and evaluation of instructional materials. Files IIAA and IIAB also refer to the School Board for negotiating tasks for the selection of supplemental materials and textbooks for program implementation.

EDUCATION PROGRAMS

Similar to policies that touch on resource distribution, policies that address equity in programming rarely refer to any **legal** or **research-based** evidence for policy support and tend to fall under the basic commitments and instructional program sections of School Board policy. Foremost, equity in policies for education programming is written within the context of division goals. According to ACPS’s Educational Philosophy outlined in File AD, in order to provide “equal opportunity for every student to achieve maximum intellectual, social, emotional and physical growth,” the School Board shall:

- Provide “the necessary trained and dedicated leadership, qualified personnel, equipment and materials to assure an appropriate education for every student,”
- Treat “all members of the school community equitably with the highest degree of respect,” and
- Allocate and use “funds fairly and efficiently.”

When reviewing instructional goals and objectives, the policy outlined in File IA states that a “responsive environment includes competent, dedicated teachers using a variety of techniques and a classroom atmosphere where students can function and develop according to their abilities.” While both policies outlined in Files AD and IA recognize the importance of tailoring instruction to students’ different ability levels, and while File IA describes the inclusion of programs for students with disabilities and limited English proficiency to prioritize individualized learning, they fall short of identifying more specific goals for creating instruction and programming that meet the needs of historically disadvantaged student groups. Policy in File IFA for assessment and evaluation is similar in its description of providing instruction that is “challenging and engaging for all students, ensuring that they perceive their education as relevant, authentic, and purposeful.” Again, little attention is given to the importance of offering programs that target the needs of marginalized students.

With ACPS’s aim to offer comprehensive programming to meet the needs of all students, some policies do go into greater detail in the **efficient use** of the division’s resources in line with this overarching goal. Policies outlined in Files IGBA, IGBB, IGBF, IGBD, and IGBE summarize the use of division resources to screen for and meet the learning needs of students with disabilities, gifted abilities, limited English proficiency, and those who may require

extended learning or remedial education, respectively. File IGBG also stipulates guidelines for allocating resources for the instruction of homebound students.

With regard to the extent that ACPS's program policies adequately inform stakeholders about the rationale, purpose and scope of their application (i.e., how **educative** they are), Hanover ascertained few policies with such depth of information. For example, policies listed in File IF review the goals and purposes of curriculum development. One such purpose for adapting curricula that adhere to the division's standards is to "[r]espond to the division needs assessment and achievement data." While this statement recognizes the importance of developing curricula that are responsive to student achievement, it remains unclear if the rationale of this policy is associated with gaps in achievement or creating curricula more inclusive to the needs of specific student groups who might otherwise face barriers to achievement. Thus, further explanation of ACPS's policies for curriculum and program development would help to clarify these inferences.

Indeed, further explanation of the division's system of **accountability** for program creation, implementation, and assessment would also help to highlight the seriousness with which ACPS incorporates equity into such practices. That is, policies for academic excellence and educational equity under File IGBJ note that administrators, teachers, and staff are responsible for "[p]roviding a challenging educational program to every student" and are "accountable for the "learning and achievement of all students" by modeling a culture of responsibility. Notably, these policies do not identify the steps the division will take to monitor or measure the equity of programming and students' access to rigorous curricula.

SCHOOL CLIMATE

Equity in ACPS's policies is most apparent among those that contribute to building, maintaining, and protecting positive, safe, and supportive educational environments. From a **legal** standpoint, policies under Files AC and JCA highlight several laws for nondiscrimination and protecting victims of crime, respectively. For example, seven references to federal and state laws are made to the protection of students against discrimination on the basis of "age, race, national origin, ancestry, disability, religion, gender, gender identity, gender expression, sex, sexual orientation, genetic information, pregnancy, marital status, status as a parent, or political affiliation" (File AC). Policies filed under the Student Code of Conduct (Files JFC and JFC-R) also refer to Virginia State Codes to define safe, responsible, and appropriate behavior. In addition to these legal references, File GBA/JFHA provides an in-depth review of Title IX protection for the prohibition of all forms of sexual harassment and harassment on the basis of "race, national origin, disability, religion, gender, gender identity, gender expression or sexual orientation."

While no policies incorporate **research or scholarly-based** content into the framework of equity in the school environment, many provide an abundant amount of background information (*context*) about the division's aim to ensure fair and safe environments to all students. According to student policies defined in File JB:

Equal educational opportunities shall be available for all students, without regard to race, national origin, disability, religion, gender, gender identity, gender expression, sexual orientation or marital or parental status. Further, educational programs shall be designed to meet with varying needs of all students. No student, on the basis of race, national origin, disability, religion, gender, gender identity, gender expression, sexual orientation or marital or parental status, shall be denied equal access to programs, activities, services, or benefits or be limited in the exercise of any right, privilege, advantage, or denied equal access to educational and extracurricular programs and activities.

Student wellness may also be considered part of the division's approach to sustaining a positive and equitable school climate; in File JHCF, for instance, the policy states that ACPS is "committed to providing a school environment that enhances learning through the development of lifelong wellness practices." As part of the division's initiative to ensure equity, in File JFB, ACPS "recognizes the student body as a significant part of the community and in the decision making process." Subsequently, student input is made part of the "data collection process" by the Superintendent for decision making.

As it relates to school climate, equity is also embedded in policies for instructional programs and community relations. File IGBJ states that ACPS "pledges to educate students in an atmosphere of excellence and educational equity that prepares them for citizenship and ensures they are challenged to stretch their talents and aspirations." This policy further states that "[a]lthough educational equity does not mean that all students will have the same experiences or the same results, it does mean that the education provided by ACPS will respond to each student's individual challenges, interests, and abilities, and that each student will be provided with the tools needed to excel." Indeed, such context helps to establish a precedent for addressing other aspects of equity, including the collaboration between parents and educators to support inclusive environments and programming as defined in policies under Files IGBC, IKA, and IKA-R for parent/guardian involvement. Together, these policies encourage the participation of parents of all children

While ACPS provides this broader context for establishing equitable environments, few policies address the *efficiency* with which ACPS plans to equitably and fairly distribute resources to maintain safe and positive school climates for all students with diverse identities. Policies under File JB, for example, state that ACPS shall "[p]rovide facilities, programs and activities that are accessible, usable and available to qualified disabled persons." While this specific guideline acknowledges the importance of equitable access to educational resources for disabled youth, it does not recognize the need in doing so for students that face other disadvantages. In another example, File IIBD, which lists policies for school libraries and media centers, states that the division must "provide materials representative of religious, ethnic, and cultural groups and their contribution to American heritage." Again, this policy is limited in its account of how the division plans to equitably allocate resources in support of maintaining positive and inclusive environments for students that face distinct challenges on the basis of their different identities, backgrounds, and needs. In the division's policy on community involvement in decision making (File KC), ACPS simply states that "The School Board recognizes that community knowledge and experience can be useful in the Board's

governance of the school division. The Board may involve residents both as individuals and as groups to act as advisors and information resources.” The division does not clarify which types of resources will be used to conduct outreach and facilitate relationships with community members in an effort to involve the community in decision making.

On the other hand, ACPS’s policies are **educative** in their inclusion of provisions that stipulate other practices and procedures for creating safe and supportive school environments. File JFC-R provides clear examples of student code of conduct and violations of this code. Similar policies for maintaining school safety and protection from violence or discriminatory behavior include those listed in Files JCA, JFCD, JFCE, JFCF, JFCH, and JFCI. Together, these files stipulate procedures for school transfer for safety as well as protection from weapons, gang behavior, and drugs. Files JHCA, JHCB, JHCC, JHCCA/-E, JHCD/-R, and JHCH-R2 also present transparent policies and procedures for student safety related to health, such as student immunizations and health requirements, prevention of the spread of communicable diseases, safety for blood borne or infectious diseases, protection for students living with HIV, regulations for the administration of medications, and food and allergy guidelines. Finally, policies under File IGBC for parent/guardian involvement list seven actionable steps for communicating with and encouraging parents to participate in the educational experiences of their children.

Given the great extent to which these policies address student safety, as part of the division’s aim to provide comprehensive policies for student protection, multiple files articulate regulations for **accountability**. To this end, policies under Files JB, JB-R, JBA, JBA-R, and JFHA-R recite clear procedures for complaints of discrimination and processes for ensuring appropriate response to such complaints.

ACHIEVEMENT

Unlike the other dimensions of equity explored above, equity in student achievement is concentrated to just a few policies for basic commitments and instructional programs, and is mostly addressed in terms of division **accountability**. ACPS’s Comprehensive Plan policy listed in File AF provides minimal context about achievement as a division priority, simply stating that the division’s plan must include “strategies for first improving student achievement, particularly the achievement of educationally at-risk students.” File IFA lists the goals and purposes of student assessment and the Superintendent’s role in ensuring that such data are collected and reported regularly in line with the Virginia Standards of Learning. File IAA also addresses accountability for student achievement and lists several requirements for parents’ notification of students’ academic progress. While Goal 1 of the division’s strategic plan (“Academic Excellence and Educational Equity”) is referenced in File IAA, policies in File IM are more explicit in their description of holding instructional programs accountable for narrowing achievement gaps between student groups:

A major purpose of the evaluation of instructional programs is to determine the extent to which they serve the needs of all learners. Such evaluations should confirm the extent to which there is alignment between instructional programs and division priorities (as articulated in the Division Strategic Plan). Additionally, the evaluation of instructional programs should provide insight into the degree to which students in identified federal and state “gap” areas (i.e., ELL, SPED, economically disadvantaged, Black, Hispanic) are making satisfactory progress in achieving proficiency in the Virginia Standards of Learning and the ACPS curriculum outcomes.

IMPLICATIONS MOVING FORWARD

Out of the six school districts profiled in this report, the extent to which ACPS’s policies incorporate a lens towards equity is comparable to most (see Figure 2.2 below). Though, Cambridge Public Schools’ policies are ranked considerably higher in terms of the depth with which they discuss the equity of the district’s educational practices. In the remainder of this section, Hanover compares ACPS’s policies with those of other districts in greater detail while identifying possible improvements as the division considers next steps in policy enhancement.

Figure 2.2: Summary of District Policy Equity Ratings

SCHOOL DISTRICT	SUMMATIVE RATING
Cambridge Public Schools	69
Springfield School District 186	50
Aldine Independent School District	47
Roanoke City Public Schools	46
Alexandria City Public Schools	45
Farmington Public Schools	39

Recommendation 1: Make clear references to research or scholarly work to help highlight the importance of equity for student success.

Missing from ACPS’s policies are references to research or evidence-based strategies for establishing equitable and fair practices for distributing resources, creating and implementing programs, establishing safe and welcoming school environments, and reducing gaps in achievement. Like ACPS, the policies of all other districts profiled in this report also lack attention to this policy domain. Indeed, SSD and RCPS received scores of 0, AISD received a score of 1, and FPS and CPS received scores of 2. In the cases of FPS and CPS, both districts incorporated up-to-date information on bullying and the harm it can cause to victims. The reference to research is even more acute in AISD’s policies, which simply notes that the district shall “consider evidence-based strategies and techniques” for supporting students’ health and wellness. Despite the relatively few references made to research among ACPS’s and other districts’ policies, as noted in Section I, incorporating evidence from research into policy helps to establish the legitimacy of claims that equity is essential to improving the educational experiences and outcomes of all students—particularly those that have faced historical disadvantages.

Recommendation 2: Provide clarity on the specific student subgroups that have historically been marginalized in school settings that may be eligible to receive additional resources or enroll in specialized programs.

While ACPS's policies provide some context about the equitable provision of resources, enrollment opportunities in programs for language learners or students with disabilities, and differentiated instruction for meeting the unique needs of all students, they notably lack more detailed information about the allocation of these resources for racially or socioeconomically disadvantaged students. By comparison, CPS's School Board offers a Controlled Choice Plan that explains the district's "core values of academic excellence and social justice for all students" as well as the procedures for "providing equal access to an array of highly attractive, excellent quality schools." Policies outlined in this file discuss CPS's commitment to creating racial and income balance at its schools and steps for ensuring fair representation and access to "equitable educational opportunities and with improved achievement." In another example, SSD lists the specific services that are made available to at-risk student populations, including counseling and opportunities to enroll in credit recovery, graduation incentive, or alternative placement programs. SSD policy also articulates the importance of "multiculturalism" and "cultural competence" in the delivery of all programs.

Recommendation 3: Create policy that protects against bullying in support of creating safe and welcoming school environments.

Unlike SSD, AISD, FPS, and CPS, ACPS does not include a separate policy on bullying prevention or interventions and procedures to address reported bullying behavior, a policy that is often used to convey the importance of student safety and welcoming environments. While ACPS does provide several policy files on harassment and nondiscrimination, bullying policy tends to focus less on equitable and fair access to programming and more explicitly on behaviors that can hinder experiences or isolate students on the basis of a particular attribute. At FPS, for example, policies on bullying use comprehensive definitions to define bullying behavior, including cyberbullying, to illustrate to students the types of behavior that are not tolerated and what may be reported. CPS also goes to great length to define bullying behavior and provides comprehensive information about the process for submitting and overseeing a complaint and charges against an aggressor. Indeed, ACPS may benefit from creating similar policies in an effort to convey the importance of safe and equitable environments for all students.

Recommendation 4: Make the elimination of gaps in achievement a more clearly defined goal and identify practices the division will take to address these gaps.

Despite that gaps in achievement between different student subgroups signal barriers to learning and educational success, few districts, including ACPS, provide an in-depth discussion of educational equity for improving achievement. As in the case of RCPS, for example, the district lists improving student achievement, "particularly the achievement of educationally

at-risk students,” as a learning objective. In fact, RCPS continually publishes academic performance scores across different student subgroups and schools in an “Equity Scorecard” to monitor progress towards the reduction of gaps in achievement. Yet, no further policy provided by the RCPS School Board details steps for meeting the needs of diverse students nor eliminating barriers to educational success. In a somewhat more detailed account, one of CPS’s policies lists six core district requirements for reporting student achievement so that students and parents are kept informed of academic progress. ACPS may perhaps have the clearest accountability for student achievement written in policy File IM, in which “the evaluation of instructional programs should provide insight into the degree to which students in identified federal and state ‘gap’ areas (i.e., ELL, SPED, economically disadvantaged, Black, Hispanic) are making satisfactory progress in achieving proficiency.” Nevertheless, further discussion of achievement gaps, how they are measured, and their linkages to educational barriers may benefit ACPS in its aim to establish a clear framework for addressing equity in education.

APPENDIX A: EQUITY POLICY CONTENT

Below, Hanover provides further information about the specific content of policy that focuses explicitly on equity for students by race, gender identity, language learning status, and disability status.

RACIAL EQUITY

In order to specifically address minority achievement gaps, a number of districts concentrate their equity policies and programs on racial equity. Puget Sound Educational Services District (PSESD) frames the goal as such: “Achievement data from our district partners mirrors that from other regions of Washington State and the nation, painting a picture of unfulfilled promise that has profound consequences for thousands of students, their families and communities.”⁵³

To address these inequities, districts establish equity policies that chart a path forward for establishing racial equity. Common strategies employed in such policies include building cultural proficiency among staff, establishing equitable hiring practices to promote a diverse faculty, and engaging stakeholders to participate in the identification and elimination of inequitable practices.⁵⁴ For example, Saint Paul Public Schools’ (SPPS) adopted a racial equity policy in July of 2013 with the purpose of confronting institutional racism embedded within the district. Figure A.1 presents an excerpt of the policy, which describes actions for eliminating disparities, ensuring equity, and monitoring implementation.

⁵³ “Operating Policy No. 1010: Racial Equity Policy.” Puget Sound Educational Services District. p. 1.
<https://www.psesd.org/wp-content/uploads/2015/03/PSESDRacialEquityPolicy1010.pdf>

⁵⁴ [1] “Operating Policy No. 1010: Racial Equity Policy,” Op. cit., pp. 1-2.

[2] “Racial Equity,” Op. cit., pp. 1-2.

Figure A.1: SPPS Racial Equity Policy

Eliminate Systemic Disparities
<ul style="list-style-type: none"> ▪ Invite and include people from all races and ethnicities to examine issues and find adaptive solutions, which address the root causes and systems, rather than technical solutions, which provide one-time, situational fixes; ▪ Develop the personal, professional, and organizational skills and knowledge of its employees to enable them to address the role and presence of racism; and ▪ Eliminate practices that result in predictably lower academic achievement for any student racial group compared to peers.
Ensure Systemic Equity
<ul style="list-style-type: none"> ▪ Family, Student and Community Engagement: SPPS employees will develop and implement equitable practices for and with our students, their families and other community members. This will involve a variety of community outreach efforts, including engaging family and community with staff and students, in order to solve racial issues collectively. ▪ Leadership: SPPS leaders will ensure that racial equity guides employee actions and leads to improved academic results by: <ul style="list-style-type: none"> ○ Recruiting, employing, supporting, retaining and continuously developing a workforce of racially conscious and culturally competent administrative, instructional and support personnel; ○ Modeling racial equity in business practices; ○ Replacing inequitable operational practices with systems that support implementation of this policy, and ○ Focusing accountability systems and metrics on racially equitable results. ▪ Teaching and Learning: SPPS employees will work together to increase their individual and collective capacity to effectively teach a racially and ethnically diverse and changing student population through collaboration, review of practices that lead to over- or under-representation of any racial group, and
Implementation and Monitoring
<ul style="list-style-type: none"> ▪ The Board directs the Superintendent to develop and implement a system-wide racial equity plan with clear accountability and metrics, which will result in measureable academic improvements for SPPS students. The Superintendent shall regularly report progress on the plan and outcomes.

Source: SPPS⁵⁵

GENDER EQUITY

Rather than implement standalone gender equity policies, districts typically choose to address gender equality within their anti-discrimination policies. Traditional measures have focused on equality for male and female students; updated policies may expand this to explicitly protect the rights of lesbian, gay, bisexual, transgender, and queer (LGBTQ) students, as well as gender non-conforming students. These policy additions or clarifications provide these students with “institutional grounds to fight discrimination.”⁵⁶ In May of 2016, the Department of Education issued a “dear colleague” letter, informing districts of their obligations under Title IX and the inclusion of transgender status under the umbrella of

⁵⁵ Figure text adapted from: Ibid., pp. 1–2.

⁵⁶ Menzel, C. “KalisPELL Schools Approve Gender Equality Protections.” Flathead Beacon, August 12, 2015. <http://flatheadbeacon.com/2015/08/12/kalispell-schools-approve-gender-equality-protections/>

gender identity.⁵⁷ While the guidance lacks the force of law, districts may nevertheless wish to clarify their existing anti-discrimination policies.

A policy guide published in 2013 by the Gay, Lesbian, and Straight Education Network (GLSEN) and the National Center for Transgender Equality (NCTE) recommends that policy protecting transgender and gender nonconforming students address:⁵⁸

- Definitions
- Scope of policy
- Bullying, harassment, and discrimination
- Privacy and confidentiality
- Media and community communication
- Official records
- Names and pronouns
- Dress code
- Access to gender-segregated activities and areas
- Student transitions
- Training and professional development
- Policy publication

A 2015 policy guide published by District of Columbia Public Schools (DCPS) provides a useful example of such policy language in practice. The policy guide includes definitions and proper-use guidelines for gender-related terms, school facility requirements, and guidance for gender-based activities.⁵⁹ Figure A.2 presents a sample of suggested policy language, as well as tips for school-based staff on transgender and gender-nonconforming student-related protocol. Note that while definitions for terms such as “cisgender” and “gender identity” are not policy in themselves, these definitions are integral to crafting explicit policies and future policy implementation

⁵⁷ Lhamon, C. and V. Gupta. “Dear Colleague Letter on Transgender Students.” U.S. Department of Justice, 2016. <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201605-title-ix-transgender.pdf>

⁵⁸ “Model District Policy on Transgender and Gender Nonconforming Students.” Gay, Lesbian & Straight Education Network, 2013. pp. 2–8. http://www.glsen.org/sites/default/files/Trans_ModelPolicy_2013.pdf

⁵⁹ “Transgender and Gender-Nonconforming Policy Guidance.” District of Columbia Public Schools, 2015. p. 2. <http://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS%20Transgender%20Gender%20Non%20Conforming%20Policy%20Guidance.pdf>

Figure A.2: DCPS Transgender and Gender-Nonconforming Policy

Definitions for Policy and Daily Use
<ul style="list-style-type: none"> ▪ Cisgender: Refers to people whose sex assignment at birth corresponds to their gender identity and expression (Cis- from Latin meaning "on the same side [as]" or "on this side [of]"). ▪ Gender Expression: The manner in which a person represents or expresses gender to others, often through behavior, clothing, hairstyles, activities, voice or mannerisms. ▪ Gender Identity: A person’s deeply held internal sense or psychological knowledge of their own gender, regardless of the biological sex they were assigned at birth. Everyone has a gender identity.
Names/Pronouns Use Policy
<ul style="list-style-type: none"> ▪ Pronoun usage: Students have the right to be addressed by the name and pronoun that correspond to the student’s gender identity. A court-ordered name or gender change is not required, and the student does not need to change their official records. ▪ Name usage: Generally, if a student wishes for their name to be changed at school, despite whether or not a student has brought in a legal name change, all unofficial records should reflect their preferred name. Examples of unofficial school documents include yearbooks, team and class rosters, and newspapers/newsletters. ▪ Quick Tip for School-Based Staff: It is always appropriate to ask a student their preferred name and gender pronoun. This can set the tone for a more respectful and trusting relationship.
School Facilities and Requirements Policy
<ul style="list-style-type: none"> ▪ Bathrooms: Having safe access to restroom facilities is important to the health and wellbeing of all people, including those who identify as transgender and gender-nonconforming. Students are allowed to use the same bathrooms as their peers, unless they request alternate accommodations. This means that transgender and gender-nonconforming students are entitled to use the bathroom that matches their gender identity. ▪ Locker Rooms: Schools may maintain separate locker room facilities for male and female students. However, all students must have access to the locker room facility that corresponds to their gender identity ▪ Dress Code: Schools may enforce dress codes, but any dress code must be gender-neutral. Students must have the right to dress in accordance with their gender identity, within the constraints of the dress codes adopted by the school. School staff must not enforce a school’s dress code more strictly against transgender and gender-nonconforming students than other students. ▪ Quick Tip for School-Based Staff: Some students may feel uncomfortable using shared facilities. Facilities that are currently designed for single users must be designated as gender-neutral.
Gender-Based Activities Policy
<ul style="list-style-type: none"> ▪ Physical Education: All students must be permitted to participate in physical education classes and intramural sports in a manner consistent with their gender identity. ▪ Intramural/Interscholastic Activities: All students should have the opportunity to participate in DCIAA and DCSAA activities in a manner that is consistent with their gender identity, irrespective of the gender listed on a student’s records or identification documents.

Source: DCPS⁶⁰

⁶⁰ Content taken verbatim from: Ibid., pp. 4–10.

EQUITY FOR ENGLISH LANGUAGE LEARNERS

English language learners (ELLs) are another student population that equity policies may specifically address. In January of 2015, the U.S. Departments of Education and Justice released joint guidance to remind states, districts, and schools of “their obligations under federal law to ensure that English learner students have equal access to a high-quality education and opportunity to achieve their full academic potential.”⁶¹ Districts may also refer to ELL-related equity policies as an Equal Access Plan or Lau Plan (named after a pivotal 1974 court ruling that defended rights for ELLs).

While states such as Ohio issue policy guidance and recommendations for teaching ELLs, The Education Alliance of Brown University notes that explicit district policies help teachers and administrators to “navigate [state] policy complexities and even contradictions.”⁶² According to the Education Alliance, comprehensive policy regarding ELL equity should, among other elements, address: the ELL identification process, entry and exit assessments, the role of teachers, ESL teachers’ schedules, the availability of adult native speakers, student scheduling, and handbook language.⁶³

EQUITY FOR STUDENTS WITH DISABILITIES

Comprehensive equity policies related to students with disabilities may encompass both inclusion policies and policies related to the representation of certain student groups within special education programs. In regard to inclusion policies, the Individuals with Disabilities Education Act (IDEA) requires that districts, to the extent possible, educate students with disabilities in the least restrictive environment.⁶⁴ To shape and assess inclusion policy, districts can use a self-assessment tool published in “Building Inclusive Schools: Tools and Strategies for Success”⁶⁵

⁶¹ “U.S. Departments of Education and Justice Release Joint Guidance to Ensure English Learner Students Have Equal Access to High-Quality Education | U.S. Department of Education.” U.S. Department of Education, January 7, 2015. <http://www.ed.gov/news/press-releases/us-departments-education-and-justice-release-joint-guidance-ensure-english-learn>

⁶² “Policy: Teaching Diverse Learners.” Brown University. <https://www.brown.edu/academics/education-alliance/teaching-diverse-learners/policy>

⁶³ “Tools: What Is Your School’s Equity Policy Quotient (EPQ)? | Teaching Diverse Learners.” Brown University. <https://www.brown.edu/academics/education-alliance/teaching-diverse-learners/tools-what-your-schools-equity-policy-quotient-epq>

⁶⁴ “Sec. 300.114 LRE Requirements.” U.S. Department of Education. <http://idea.ed.gov/explore/view/p/,root,regs,300,B,300%252E114>,

⁶⁵ “District- and Site-Level Self-Assessment Tools.” San Francisco Public Schools. p. 262. <http://www.sfusd.edu/en/assets/sfusd-staff/programs/files/special-education/Self%20Assessment%20Tools.pdf>

The first section of the assessment identifies the need for district policy to address the following areas:⁶⁶

- There is a current board of education policy on inclusion.
- There is an existing long-range LEA [local education administration] plan for inclusion.
- There is an inclusion task force and LRE Committee in the LEA that is cross-constituency and assists in planning for inclusive education.
- Policies exist that have been negotiated between the teachers' association and the school district in regard to the implementation of inclusion.
- The LEA has a working definition of inclusive education.
- This definition of inclusive education has been disseminated to parents and staff throughout the LEA.

Apart from inclusion policies, comprehensive equity policies for students with disabilities may address what research has identified as “the disproportionate representation of minority students in special education programs.”⁶⁷ A 2016 report published by ED finds that schools may identify minority children – particularly black and American Indian youth – for special education services at higher rates than their white peers. As a result, ED notes that “it is critical to ensure that overrepresentation is not the result of misidentification, which can interfere with a school's ability to provide children with the appropriate educational services required by law.”⁶⁸

⁶⁶ Bulleted text taken verbatim from: Ibid.

⁶⁷ Skiba, R. et al. “Achieving Equity in Special Education: History, Status, and Current Challenges.” *Exceptional Children*, 74:3, 2008. p. 264. Accessed via EBSCOhost.

⁶⁸ “U.S. Department of Education Takes Action to Deliver Equity for Students with Disabilities | U.S. Department of Education.” U.S. Department of Education, February 23, 2016. <http://www.ed.gov/news/press-releases/us-department-education-takes-action-deliver-equity-students-disabilities>

APPENDIX B: THE ANALYTIC PROCESS

In the preliminary phase of this study, analysts first conducted an online scan to identify a rubric or tool that could be used to evaluate school board policies in terms of their equity. While several sources were found that discussed the creation of policy for educational equity, the Great Lakes Equity Center's (GLEC) policy analysis tool proved most useful for establishing different policy domains with which to rate the effectiveness and exhaustiveness of school board policies. Namely, GLEC's tool allows analysts to evaluate policy from the perspective of law, research, institutional context, efficiency, rationale, and accountability. While effective for exploring these different domains, analysts discovered that there are two limitations to the use of this tool. First, it does not conceptualize educational equity or equity's implications for educational practice, and second, it does not define a system with which to rate policies according to each domain. Rather, authors of the policy tool leave room for interpreting the extent to which policies may be considered strong or weak.

To address the first limitation, Hanover analysts further explored definitions of equity and the types of strategies schools or districts implement to establish equitable practices. Through this investigation, Hanover discovered the California Department of Education's (CDE) resources on equity and access in education, part of which define dimensions of equity for district policy. According to the CDE, "[r]esearch shows that equity in schooling is reflected in four broad areas: a) resource distribution, b) programs, c) school climate, and d) achievement."⁶⁹ These areas of equity, and the definitions the CDE provides for each, were then added to GLEC's rubric so that analysts could assess policy with an explicit lens towards educational equity.

To address the rubric's second limitation, Hanover collaborated with ACPS contacts to create a rating system defined by the number of sentences that capture elements of equity described by the CDE as well as the clarity of the language used. Essentially, the final rubric and rating system evaluate how closely a school board's policies mirror the CDE's dimensions of equity from the perspective of law, research, institutional context, efficiency, rationale, and accountability.

On the whole, Hanover analysts found that the rubric and rating system are useful tools for consistently and fairly assessing the equity of district policies.⁷⁰ When using the rubric, analysts would take notes on specific policy files, tracking the clarity of the language used to describe different domains of policy and dimensions of equity. Notably, districts with higher summative scores have policies longer in length that specifically acknowledge the student groups facing particular racial and socioeconomic disadvantages. Higher-rated policies also tend to provide detailed descriptions of the types of resources and strategies used to level inequalities among students of various identities. At large, analysts perceived the policies of

⁶⁹ Select 'Characteristics' tab using the following link: "Equity." California Department of Education. <http://www.cde.ca.gov/qs/ea/index.asp>

⁷⁰ This inference is not measured by statistical accuracy or reliability.

CPS and AISD to rate highly in terms of equity, both of which have higher summative scores using the rubric than ACPS.

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