"Folks like us" : exploring state education policy in New York's rural school districts

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“FOLKS LIKE US”:
EXPLORING STATE EDUCATION POLICY
IN NEW YORK’S RURAL SCHOOL DISTRICTS

by

Nicole Lennon

A Dissertation
Submitted to the University at Albany, State University of New York
In Partial Fulfillment of
the Requirements for the Degree of
Doctor of Philosophy

School of Education
Department of Educational Policy and Leadership
2021
Abstract

Diversity has been a major topic in education in recent years. However, often missing from the conversation is consideration of geographic diversity across urban, suburban, and rural school districts. Research shows that geographic place influences educational capacity, opportunities, and trajectories, as well as social life, cultural values, and individual identity. The policy process is influenced by dominant ideologies that tend to problematize rural places and favor the interests of metropolitan places. This metro-centric ideology may continue to influence educational policymaking in the United States today, as scholars have found policymakers often reuse similar urban-favored tools and solutions in the design of new education policies.

Rural schools and communities may face additional barriers when education policies are designed with the resources and capacity of metropolitan schools in mind, but limited attention has been paid to metro-centrism in state education policies. This study begins to explore the existence of metro-centric ideology in the state education policy process by examining the design and implementation of four New York State (NYS) education policies in three rural school districts. Additionally, this study explores key similarities and differences in the perceptions of NYS education officials and rural school districts leaders regarding the role of rural schools in the state policy process.

Significant findings from this study center around the capacity of rural school districts to implement policy requirements and the differing perceptions of state officials and district leaders regarding the role of rural school districts in the state education policy process. These findings suggest that a lack of rural voice in policy development and limited consideration of the access school districts have to non-financial resources may contribute to metro-centric features of policy design. The findings of this study lend support to the presumption that NYS education policies may often be designed with the resources and capacity of metropolitan schools in mind.
Acknowledgements

Thank you to my chair and committee for their guidance, and to my family for their support.

Special thank you to the interviewees in this study for taking the time to speak with me and bringing this study to life.
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<th>Description</th>
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<tbody>
<tr>
<td>APPR</td>
<td>Annual Professional Performance Reviews</td>
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<tr>
<td>ARRA</td>
<td>American Recovery and Reinvestment Act</td>
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<tr>
<td>BOCES</td>
<td>Board of Cooperative Educational Services</td>
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<tr>
<td>BOE</td>
<td>Board of Education</td>
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<tr>
<td>BOR</td>
<td>Board of Regents</td>
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<tr>
<td>CTE</td>
<td>Career and Technical Education</td>
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<tr>
<td>ELA</td>
<td>English Language Arts</td>
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<tr>
<td>ELL</td>
<td>English Language Learner</td>
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<tr>
<td>ESEA</td>
<td>Elementary and Secondary Education Act</td>
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<tr>
<td>ESSA</td>
<td>Every Student Succeeds Act</td>
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<tr>
<td>GS</td>
<td>Good Standing</td>
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<tr>
<td>HEDI</td>
<td>Highly Effective, Effective, Developing, or Ineffective</td>
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<td>HQT</td>
<td>Highly Qualified Teacher</td>
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<td>IMF</td>
<td>Institutional Master Files</td>
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<td>MFA</td>
<td>Multi-Factor Authentication</td>
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<td>MOU</td>
<td>Memorandum of Understanding</td>
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<td>N/RC</td>
<td>Need to Resource Capacity</td>
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<tr>
<td>Acronym</td>
<td>Full Form</td>
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<tr>
<td>NCES</td>
<td>National Center for Education Statistics</td>
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<td>NCLB</td>
<td>No Child Left Behind</td>
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<td>NIST</td>
<td>National Institute of Standards and Technology</td>
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<tr>
<td>NYC</td>
<td>New York City</td>
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<tr>
<td>NYS</td>
<td>New York State</td>
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<td>NYSED</td>
<td>New York State Education Department</td>
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<tr>
<td>P-12</td>
<td>Pre-Kindergarten through 12th Grade</td>
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<td>PD</td>
<td>Professional Development</td>
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<td>PMF</td>
<td>Personnel Master Files</td>
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<tr>
<td>PII</td>
<td>Personally Identifiable Information</td>
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<td>REAP</td>
<td>Rural Education Achievement Program</td>
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<td>RIC</td>
<td>Regional Information Center</td>
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<td>RLIS</td>
<td>Rural Low Income School program</td>
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<td>RSA</td>
<td>Rural Schools Association</td>
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<td>RTT</td>
<td>Race to the Top</td>
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<td>SBO</td>
<td>School Business Officials</td>
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<tr>
<td>SEDL</td>
<td>Social and Emotional Development and Learning</td>
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<tr>
<td>SEL</td>
<td>Social Emotional Learning</td>
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<tr>
<td>SFY</td>
<td>State Fiscal Year</td>
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<tr>
<td>SIG</td>
<td>School Improvement Grants program</td>
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<tr>
<td>SRO</td>
<td>School Resource Officer</td>
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<tr>
<td>SRSA</td>
<td>Small Rural Schools Achievement program</td>
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<tr>
<td>TD</td>
<td>Target District</td>
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<tr>
<td>USDA</td>
<td>United States Department of Agriculture</td>
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<tr>
<td>USDOE</td>
<td>United States Department of Education</td>
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Chapter 1: Introduction

I. Background

Diversity has been a major topic in education and schooling in recent years. Racial diversity, ethnic diversity, gender diversity – these have become familiar agenda items for policymakers and school leaders striving for inclusivity, respect, and the provision of a quality educational experience for all students. However, often missing from the agenda is consideration of geographic diversity, specifically referring to the similarities and differences across urban, suburban, and rural places for the purposes of this paper. Place is both a physical location and a cultural arena of social interactions that have distinct influences on students, educators, and communities across the rural-urban continuum. This study investigates what implications differences attributable to place may have on the efficacy of education policies implemented in rural public school districts in the state of New York.

Research Problem

Place influences resources, educational trajectories, services, opportunities, stressors, and access, as well as social life and cultural interactions for students, educators, and their larger communities (Becnal & Moeller 2015; Boyd, Lankford, Loeb & Wyckoff 2005; Burkell & Saqinur 2015; Hillman 2016; Kryst, Kotok & Hagedorn 2018; Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2019; Rude & Miller 2018). For example, rural youth may have fewer social opportunities in their smaller communities when compared to their urban peers, but may also be more conscientious about maintaining social relationships and resolving disagreements amicably because the fewer opportunities increases the risk associated with alienating friends (Becnal & Moeller 2015; Burkell & Saqinur 2015). Likewise, rural families and educators may have reduced access to specialized services and other resources, but
are generally buffered from many environmental stressors associated with urbanized areas, such as violent crime and pollution (Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2018). Important differences exist across urban, suburban, and rural schools that influence the educational experiences and trajectories of students, thus necessitating policy design better account for these distinctions.

The policy process draws on dominant ideologies and frames public perception of target populations in the crafting of the tools and solutions (Asen 2010; Malen & Knapp 1997; Stein 2004). As policymakers draw on familiar policy designs to address new problems, social constructions of target populations may appear in the formulation of new policy solutions (Schneider & Ingram 1988). In American education, the “Rural School Problem” has been a dominant social construction of rural schooling since its appearance in the 1897 report issued by the Committee of Twelve on Rural Schools. Educational reform in the years following drove consolidation-based, redirected school reforms across the industrializing United States with an “ideology that equated urbanization with progress” and painted small, rural schools as unable to meet the needs of a changing society (Danbom 1979; Grineski 2013; Sher 1977b, p. 273; Steffes 2008; Theobold & Wood 2010). This commitment to urbanism, or metro-centric ideology, may continue to influence educational policymaking in the United States today (Kannapel & DeYoung 1999).

Metro-centric ideology leads policy and practice to favor the interests of cities over the countryside, leaving rural needs and interests often neglected in the policy process (Colwell 1970; Jakubowski 2019; Thomas, Lowe, Fulkerson & Smith 2011). Some scholars have identified metro-centrism in contemporary federal education policy that exemplify misunderstandings of rural places (Eppley 2009; Johnson & Howley 2015). For example, the
Rural Flexibility Provision granted extensions to meet the requirements of the Highly Qualified Teacher provision under No Child Left Behind (NCLB). However, most of America’s rural schools did not qualify for the flexibility provision, including most schools of the Rural Low Income School Program which tend to be the most difficult to staff (Eppley 2009). Further, Race to the Top featured strategies found to exacerbate challenges already faced by rural school districts, such as recruiting teachers and transportation. However, the same strategies were also used in the intervention plans of the School Improvement Grants program (Johnson & Howley 2015). In either case, federal education policy was not designed to effectively consider the needs, interests, will and capacity of America’s rural schools.

II. Research Purpose

Where schools are located impacts the resources available, capacity for implementing policy mandates, and efficacy of policy solutions. Dominant ideologies manifest in policy design through reliance on familiar tools and solutions, which may perpetuate social constructions while also limiting the potential for less prevalent policy design elements to be used (Schneider & Ingram 1988). Places and perceptions of strengths and challenges within them are interpreted and prioritized differently by different groups of people (Gruenewald 2003a). However, rural schools and communities face additional barriers and greater disadvantage when education policies are designed with the resources, capacity, needs, and interests of metropolitan schools in mind.

Prioritizing place in policy development can help policymakers begin to address underlying inequities in education and educational opportunity by creating a more wholesome understanding of the similarities and differences in schooling across communities (Hillman 2016). In New York State (NYS), education policy is made by a Board of Regents (BOR), today
composed of 17 members representing 13 districts with four members at-large (NYSED, BOR n.d.). In practice, the Regents are often leaders in the field of education or law, typically with over thirty years of experience when appointed by the state legislature to serve unsalaried five-year terms. Often, the Regents are re-appointed and go on to serve at least two consecutive terms. Today, only five of the 17 members are currently in their first term, while four have been re-elected to third terms (NYSED, BOR n.d.).

The 154 public school districts classified as rural by both the New York State Education Department (NYSED) and the National Center for Education Statistics (NCES) are found in six of the state’s 13 Regent Districts, encompassing all of Upstate, Central, and Western New York (NYSED, BOR n.d.). Combined, these six Regent Districts contain roughly 65% of NYS’s public school districts. It is beyond the scope of this paper to consider the place-based identities of each Regent charged with representing the needs and interests of the rural schools within their Districts. However, it is important to note that nearly half of NYS’s Regent Districts include rural school districts whose representation is intertwined alongside the concentrated metropolitan centers of the state, such as three of the Big Four Cities in New York: Buffalo in the 8th Regent District, Rochester in the 7th Regent District, and Syracuse in the 5th Regent District (NYSED, Office of Information and Reporting Services 2019). The geographic diversity of NYS makes attention to place especially relevant to consider in the design of general state education policies.

To better understand the relevance of considering place in education policy, it is important to investigate the prevalence and consequences of metro-centrism in general state education policy design. The purpose of this study is to examine general NYS education policies

---

1 These six are the 3rd through 8th Regent Districts. The first, second, and 11th through 13th Regent Districts are each of the boroughs of New York City and the 10th Regent District covers Long Island. The 9th Regent District covers Westchester, Rockland, Dutchess, Putnam, and Orange counties (NYSED, BOR n.d.).
2 The fourth “Big Four City” is Yonkers, in Westchester County (9th Regent District).
implemented by all public school districts for indicators of metro-centrism in problem definitions, underlying assumptions, policy objectives, and proposed solutions in policy design, as well as the consequences of policy design for the implementation process in rural school districts.

**Research Questions**

My research questions are drawn from literature on rural education and schooling, the culture of education policy (Stein 2004), Malen’s (2003) framework for state activism, and comparative policy design theory:

1. What are key similarities and differences in the design of a purposive sample of four recent New York State education policies?
2. What are key similarities and differences in the will and capacity of a random sample of three rural school districts in New York State to implement these education policies?
3. What are key similarities and differences in the perceptions of New York State education officials and rural school district leaders regarding the alignment of these policies with the needs, interests, and capacity of rural school districts?

In answering these research questions, issues to be addressed include stated aims of the policies and the problems they are designed to address; financial resources and human capital required of rural school districts; state flexibility and local autonomy; ease and challenges of policy implementation for rural school districts; levels of state assistance and oversight during policy implementation; and overall alignment of the policies with the needs and interests of rural school districts.
Research Methods

My research design is a qualitative, collective case study. A collective case study allows me to describe and compare multiple school districts with a focus on contextual differences and uncovering unknown variables of influence (Creswell 2012; Yin 2009). Case studies are exploratory and well-suited to studying different contexts of implementation and decision-making. Case studies also draw from multiple sources of data to allow for a convergence of evidence and analysis, thereby increasing the validity of the findings (Yin 2009).

For my study, three (3) Pre-Kindergarten through twelfth-grade (P-12) rural, public school districts were sampled using stratified random sampling based on the remoteness of place. The school districts identified were stratified based on NCES locale designations to randomly sample one remote rural school district, one distant rural school district, and one fringe rural school district. The school board president, superintendent, building principal, and school business official, as well as any assistant superintendents and principals, as available, were interviewed from each of the three school districts sampled. Additionally, two (2) members of the BOR and six (6) state education officials were interviewed – at least one representative for each of the four education policies sampled. The interviews were conducted using a semi-structured list of open-ended questions informed by the literature.

Four (4) general state education policies enacted in State Fiscal Years (SFY) 2018-2020 were purposefully sampled based on the criteria of (a) having been implemented or in the process of implementation across all P-12 public school districts in the state of New York as of academic year 2020-2021; (b) considered a major education policy, evidenced by significant funding attached, addressing a prominent issue that garners public attention, and/or scope of impact includes notable changes to school operations and/or daily functioning; and (c) not
classified as an emergency or temporary policy. Based on these criteria, the four policies sampled were:

- Meal Shaming
  Regulations of the Commissioner of Education § 114.5

- Professional Development Plans
  Regulations of the Commissioner of Education § 100.2(dd) amended

- Student Data Privacy
  Part 121 of the Regulations of the Commissioner of Education

- School Safety Plans
  Regulations of the Commissioner of Education § 155.17 amended

Final policy documents were collected and analyzed based on the elements of comparative policy design theory, including policy goals, target populations, explicit requirements, and social constructions. Interview transcripts from school leaders and state officials and process documents for the implementation of these policies in the school districts sampled were collected and analyzed for similarities and differences in challenges, successes, and local autonomy in implementation. These findings were analyzed with a focus on the existence of decision heuristics and metro-centrism, if any, and explicit attention to the efficacy of these policies in addressing the needs and interests of rural school districts in New York.

III. Summary

In the summer of 2019, I moved out of a bordering suburb of Albany to the more distant town of Cobleskill, New York. Parallel to Interstate 88 (I-88) that connects I-90 in Albany to I-81 in Binghamton, NCES classifies Cobleskill as an Upstate Medium Suburb, far less urbanized than the immediate suburbs of Albany with approximately 1,750 P-12 students enrolled across the four schools that compose the Cobleskill-Richmondville Central School District. In passing, I shared where I lived with two NYSED officials, one having spent their professional career in a
rural area; the other a Long Island native who spent their career in Albany. Combined, their instantaneous but polarized responses captured the existence of place-based identities and its influence on individual worldviews concisely:

*Rural Career:* “Oh, so you moved to the city!”

*Long Island Native:* “What is even out there? There’s nothing to do.”

These simple reactions exemplified the literature on how place shapes identity and ideology in a few short words, with implications for how policymakers interpret social problems, community strengths, and local capacity when designing education policy for schools across the rural-urban continuum.

Little is known about the specific nature of metro-centric policy design or its relationship with policy implementation in rural school districts. Differences across geographic locales are more often studied in policy implementation, rather than taking one step back to consider the influences of different features of policy design. However, scholars of rural education suggest rural schools and communities consistently suffer from century-old social constructions and deficient-thinking of capacity and quality that manifest in contemporary policies and misunderstand modern rural realities (Cubberley 1914; Eppley 2009; Grineski 2013; Johnson & Howley 2015; Lichter & Brown 2011; Rosenfeld & Sher 1977). Attention to place in policy design may improve the efficacy of policy solutions in geographically diverse states, such as New York, wherein education policies designed to be implemented in all public school districts face communities ranging from the smallest, remotely rural parts of the state to the country’s largest metropolis in New York City.

**Relevant Definitions**

For the purposes of this paper, the following terms will be defined as:
• **Place:** The social and cultural space in which education and schooling occurs, differentiated by its physical remoteness from urbanized areas.

• **Rurality:** The non-material or cultural structure that influences the norms, networks, and meaning-making of the rural place. A descriptor of the place-based identity of individuals from rural places that contrasts with **urbanicity**, or identity of those from urban places.

• **Policy Culture:** The climate wherein policies are formulated and designed, influenced by the dominant ideologies and institutional structure of a particular historical moment, and built from procedures and assumptions in the policymaking process that shape perceptions of social problems and proposed solutions. Elements of policy cultures expand and transform through the implementation process and feed back into future policy design as they gain legitimacy in public opinion (Stein 2004).

• **Metro-centrism:** A preference for urbanicity, specifically in education policy and schooling, by which metropolitan life is regarded as more satisfying and efficient and rural places are perceived as declining or in need of remediation. Through a metro-centric lens, metropolitan experiences are the focus and rural realities are overlooked or misunderstood, generally resulting in additional barriers for rural schools and communities in policy and practice and limited attention to their specific needs and interests.

• **Decision Heuristics:** The reliance policymakers have on their individual memory in selecting elements of design, which results in the most prevalent tools being used repeatedly as new social problems are framed to fit these borrowed solutions through emphasis of their commonalities with ones previously addressed (Schneider & Ingram 1988).
Chapter 2: Literature Review

I. Education and Schooling across Place

This literature review focuses on the relationship between geographic place and policy design in education. For the purposes of this review, place is understood as the social and cultural space in which education and schooling occurs, differentiated by its physical remoteness from urbanized areas. First, this review will consider literature on geography and education and schooling across urban, suburban, and rural places, and how attention to the crafting of policy may help address differences of place in policy challenges. Then, this review will consider ideological influences on policy design, specifically as they relate to social constructions of rural places for educational reform. This review ends with an overview of comparative policy design theory as a framework for studying the relationship between place and policy in education.

A. Educational Interests in Geography

Geography is more than zip codes or terrain. The lines on a map not only show physical locations but delineate cultural arenas of human activity wherein education and schooling occur. Characteristics of everyday life unavoidably enter into the educational experience (Corbett 2014). State education policies take different forms across local school districts as they are negotiated and implemented in practice (Lipsky 1977; McLaughlin 1987). Individual outcomes, pathways, and attainment are shaped by the place in which discourse and learning occurs. A geography of education considers place as a cultural arena with differing conflicts and commonalities of identity, power, privilege, and discourse in which learning happens (Green & Letts 2007).

Geographic perspectives to social phenomena view geography as a space that is produced by peoples and interactions (Corbett 2014). These terms may seem interchangeable: geography,
place, space. All refer to the “where” of human life with subtle distinctions as layers of understanding how location relates to social interaction, culture, power, and privilege (Green & Letts 2007). Geography is both a resource and medium of power, facilitating inclusion and exclusion across societies through the configurations and challenges of a particular place and space (Green & Letts 2007). Study from a geographic lens considers political, cultural, human, economic, and educational topics with an emphasis on the construction and influences of place and space on individuals and society (Taylor 2009).

The geography of education is an underdeveloped field of inquiry (Taylor 2009). Geographic approaches to education emphasize and explore spatial relations within the context they occur, but place and space are abstract terms and the impact of geographic thought on education research is heavily intertwined with other disciplines, such as economics, politics, sociology, psychology, and history (Taylor 2009). Geographic perspectives help us better understand social, economic, and political processes by drawing attention to the similarities and differences across place. Educational interests in geography might include questions of access, equity, formal and informal learning, and the socio-political and cultural features of education policy (Taylor 2009). The challenge of geographical thought in education is in asking how to understand the complexities of power, difference, identity, and disadvantage in educational places and spaces (Green & Letts 2007).

Some scholars have investigated the influences of place on education and schooling in the United States. Geography and place shape opportunity for students in terms of upward mobility, health, educational attainment, and other life chances (Hillman 2016). Place dictates the options available to individuals in healthcare, food, transportation, and affordable housing, as well as the choices students can make regarding education and schooling. In the United States,
“education deserts” exist where postsecondary access is limited or nonexistent for some students (Hillman 2016). Individual choices are affected by the quality and quantity of goods and services available nearby, and states play a role in the locational decisions for the provision of formal education to their students (Hillman 2016; Holloway & Jöns 2012).

Even in an increasingly mobile and interconnected society, place continues to influence the choices students make. For example, four-year colleges tend to be located farther away from low-income and minority communities than from other communities (Hillman 2016). Students in these communities may face family responsibilities and financial constraints that prevent them from affording the costs of more distant four-year colleges, and instead enroll in local two-year community colleges (Hillman 2016). Thus, “geography can be destiny” because educational opportunity varies by place (Hillman 2016, p. 988).

Scholars have found place influences the choices of teachers as well. Most teachers take their first public school job close to home, or in regions similar to their hometowns. In New York State, an attachment to place appears to be an important consideration in the job search for all public teachers, who tend to favor places similar to their hometowns when accepting employment (Boyd, Lankford, Loeb & Wyckoff 2005). In Boyd, Lankford, Loeb & Wyckoff’s (2005) study, new teachers with rural backgrounds preferred to work in rural school districts, but the preference was not as strong as those from suburban or urban hometowns – possibly as a consequence of disparities in employment prospects across locales. Preference for proximity, or to be close to home, was less apparent for teachers with urban backgrounds when compared to teachers from both rural and suburban hometowns, who each preferred to remain in those regions rather than teach in urban districts (Boyd et al. 2005).
Hillman (2016) and Boyd et al. (2005) each show how place is a leading consideration for both students and teachers in the choices they make and opportunities they pursue. Some scholars have argued research and policy on rural education needs to account for both the materiality and mentality of living and learning in rural areas (Green & Letts 2007). That is, place needs to be seen as a cultural arena in which the distinctive elements of schooling that are attributable to geographic location are considered in research and policymaking. Prioritizing place in policy development can produce more nuanced understandings of inequality and begin to address underlying structural inequities in education and educational opportunity (Hillman 2016).

B. Influences of Place in Education and Schooling

Geographic place, cultural spaces, and social problems “are often perceived and prioritized differently by different groups” (Gruenewald 2003a, p. 6). Places are products of culture that represent “the outcome of human choices and decisions” (Gruenewald 2003b, p. 627). By virtue of occupying “particular places with particular attributes” the identity and possibilities for individuals are shaped by the geographic, social, and cultural environments they inhabit (Gruenewald 2003b, p. 621). Place is defined as much by its physical location as its nonmaterial, or cultural, structure. Nonmaterial structures are formed by the social networks, interactions, relationships, and mobility that flow across a particular place. Social networks “accompany stories, narratives, norms, expectations, rules, values or motivations” and spread information about opportunities and adherence to norms that establish a pattern of organization from social relationships, transactions, and the choices individuals make in navigating place (Emirbayer & Goodwin 1994; Kahne, O’Brien, Brown & Quinn 2001; Lee 2014, p. 455-6; Pooley, Cohen & Pike 2005).
The process of meaning-making occurs in the navigation of social structures by individuals (Emirbayer & Goodwin 1994; Lee 2014). Intentional human action, in part, creates the social networks that can either enable individuals or constrain their life prospects (Emirbayer & Goodwin 1994, p. 1413). How individuals attach and interpret meaning in their social interactions influence the choices they make and pathways they pursue (Lee 2014). Cultural structures can constrain individuals by blocking action and limiting communication, or enable actors “by constructing their identities, goals and aspirations, and by rendering certain issues significant and salient and others not” (Emirbayer & Goodwin 1994, p. 1441). These constraining and enabling features influence, and may ultimately determine, individual choice and action (Emirbayer & Goodwin 1994).

Schools play a “mediating role” in the shaping of place through the education of students (Gruenewald 2003b, p. 620). Local schools are a common ground for rural youth that feature “intensive and long-term contact” with children through their formative years (Kahne, O’Brien, Brown & Quinn 2001, p. 430). Schools regulate experience and interactions, thereby structuring the education youth receive. The denser and more isolated the social networks, the stronger and more uniform the cultures of a place, which heightens the influence of place-based cultures in rural communities and schools (Emirbayer & Goodwin 1994).

Rural areas are sparsely populated, so rural schools are typically small. This “microcosmic setting” often means community concerns have a greater impact on rural schools than their urban counterparts (Bauch 2001; McCracken & Miller 1988). The social, political, and economic realities of the rural community seep into the structure and conduct of the school by virtue of the student body, the broader environmental factors accentuated by the smaller scale of interactions and resources, and by rural teachers and educators (Barcus & Brunn 2010; Bauch
2001; Bouck 2004; Eppley 2009; Harmon & Schafft 2009; Virgil 2010). What rural communities expect from schooling reflect the circumstances of the local setting (Eppley 2009). As a result, the social and economic realities of a rural community influence the operations and objectives of the local school.

Rural communities often lack many career opportunities and institutions for rural youth due to their remoteness from metropolitan centers, which influence advancement and educational attainment (Bouck 2004). Data from the National Center for Education Statistics (NCES) shows, while rural student high school completion rates are comparable or above that of other locales, their subsequent enrollment in postsecondary education is far less and their postsecondary completion rates are even lower (Kryst, Kotok & Hagedorn 2018). Rural students may feel more practical post-high school options, “such as getting a job, attending a trade school, or entering the military” are better supported by their parents than attending college (Bouck 2004, p. 39). Place ultimately influences the choices and actions of rural youth because their understandings of educational attainment are formed from their community and social networks (Bouck 2004).

Community members, educators, and the beliefs of other rural adults about education impact the structure of schooling in rural communities as well. School administrator perceptions of possible pathways for rural youth may affect the structure of schooling across different types of rural communities and shape their educational trajectories (Kryst, Kotok & Hagedorn 2018). Competing philosophies among school administrators can hinder efforts for reform and impact students in any school or district, but the influence may be especially significant in rural schools where interactions between administrators, teachers, and students is more frequent and personal (Kryst, Kotok & Hagedorn 2018).
School size, course availability, and proximity to institutions of higher education each play a significant role in the educational trajectories of rural youth, but the opportunities and programs available to rural youth may be strongly related to the values of school administrators, which are influenced by the location of the school (Kryst, Kotok & Hagedorn 2018). In their study of a fringe, a distant, and a remote rural school in Pennsylvania, Kryst, Kotok & Hagedorn (2018) found postsecondary pathways and offerings were influenced by the philosophies of school administrators; meaning, the opportunities rural youth had for visiting colleges, taking additional coursework, and other educational preparation and experiences correlated with the beliefs administrators held about the postsecondary prospects of the students in their particular schools. In each case, the particular philosophies of the differing rural cultures determined the educational trajectories of the students by shaping the postsecondary preparation options the schools offered (Kryst, Kotok & Hagedorn 2018).

Bouck (2004) and Kryst, Kotok & Hagedorn (2018) show how the structure of human interaction and relationships and processes of meaning-making within social networks have “behavioral, perceptual, and attitudinal consequences” for both individuals and the overall structure of schooling within different places (Emirbayer & Goodwin 1994, p. 1418). Social networks and the nonmaterial structure of different places inform the identities, worldviews, and goals of individuals. Thus, cultural beliefs within communities may influence the expectations and structure of education for youth in rural places by shaping both their personal perceptions and educational trajectories.

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3 NCES has three categories of rural locale classifications to differentiate census-defined rural territories by their remoteness from urbanized areas and urban clusters. Rural-Fringe school districts are those closest to urbanized areas—at less than or equal to 5 miles away—as well as those closest to an urban cluster, at less than or equal to 2.5 miles away. Rural-Remote school districts are those farthest away—at more than 25 miles from urbanized areas and more than 10 miles from an urban cluster—while Rural-Distant school districts fall in the distance between the two extremes (Geverdt 2017).
C. Defining Place

Place is formally defined by the United States Bureau of the Census as “a concentration of population” that is named and locally recognized (Geographic Areas Reference Manual 1994, p. 9-1). Rural and urban are common descriptors that designate place in American society. Yet some scholars argue the rural-urban binary is a limited distinction that may instead serve to naturalize social differences and an inequitable social geography of place (Corbett 2014; Green & Letts 2007; Hillman 2016). In the policy context, the ability for policymakers to understand “rural” depends on the definitions used (Isserman 2007). Definitions of place help determine the criteria for inclusion and exclusion in policy. However, common approaches to defining rural tend to foster an imprecise, “residual” approach to locale designations, wherein rural is considered anything not urban (Brown & Schafft 2011).

Imprecise definitions of place may mean “policy is crafted with unintended consequences for rural areas” and impact the share of state and federal resources available to certain communities (Haas 1990, p. 10). For example, definitions of place may benefit from considering accessibility and isolation – or remoteness of place – in policy design, because many rural-designated locations may be more intuitively considered urban centers by the general public (Green & Letts 2007). Rural places in Montana are different from rural places in New Jersey (Elder 1992). How place is defined and designated is important for researchers and policymakers to better understand social, economic, political, and cultural factors influencing education within different contexts (Elder 1992; Haas 1990; Isserman 2007).

Census definitions – the basis for most locale designations – classify rural as any place that is not urban, and nonmetropolitan as any area that is not metropolitan. These two types of census geography then “cut across each other so that both urban and rural territory may be found
within both metropolitan and nonmetropolitan areas” (Elder 1992, p. 48).4 For education, this overlap means one implication of the residual definitions is that rural schools may be located in urban districts. Elder (1992) linked school locales with metropolitan status and county-level data, drawing from three different classification systems, to describe the characteristics of schools and districts and begin to establish some clarity around the diversity of rural settings.5 In cross-tabulating contextual categories, more nuanced classifications of place changed how many schools in urban districts would be considered rural and, as a result, how rural or urban schooling was across states (Elder 1992). Unraveling the differences within and across these classifications can improve understandings of the social and economic factors influencing education, and the precision of the definitions used for designating place (Elder 1992).

Locales can be defined in many different ways and at many different levels, as various classification systems show, but the social, political, and economic realities of place may not be accurately captured within these definitions (Cromartie & Bucholtz 2008). Definitions of place often come with connotations that encourage popularized stereotypes and social constructions and overshadow the diversity within locales and realities of place (Anderson & Summerfield 2010; Cromartie & Bucholtz 2008). However, these constructs may not necessarily be supported by empirical data, such as crime statistics, class sizes, teacher mobility, or local or state tax supports (Anderson & Summerfield 2010). Remoteness is as much socially-defined as it is a measure of distance (Rude & Miller 2018). Differences in access to resources and services,

4 A metropolitan area is conceptualized by the Census Bureau as “a core area containing a large population nucleus, together with adjacent communities that have a high degree of economic and social integration with that core” (Geographic Areas Reference Manual 1994, p. 13-1). By this definition, a rural area may be considered metropolitan if it has a degree of integration with a metropolis. The Bureau of Census defines anything within urbanized areas—meaning core cities and their densely populated adjacent areas—and places of 2,500 or more inhabitants outside of urbanized areas as “urban” areas (Geographic Areas Reference Manual 1994, p. 12-1).
neighborhood stressors, community buffers, social life, culture, and the interactions of individuals are each aggravated by the increased remoteness of place from metropolitan centers. Many challenges in education and schooling are heightened in rural communities because individuals have social preferences related to the remoteness of place that are not captured in definitions used in locale classification systems to inform policy development (Rude & Miller 2018).

Attracting and retaining teachers in rural areas is one example of a challenge in rural schooling often heightened by the remoteness of place (Rude & Miller 2018). Rude & Miller (2018) consider socially-distinguished degrees of remoteness to illustrate measures of the attractiveness of rural places for prospective teachers:

- **Proximity rural school districts** are close enough to urban centers for individuals to commute back to the city for social opportunities.
- **Resort or recreation rural communities** have many amenities and services to attract tourists to the area but may be beyond the reach of the modest earnings of educators.
- **Remote rural schools** are more isolated, have limited services, and are distant from social and cultural opportunities.

These socially-defined locale categories illustrate how individual preferences for place may influence challenges and opportunities in rural schools, as well as problems and proposed solutions in education policymaking (Rude & Miller 2018). What the imprecision and cultural connotations in definition overlook are relevant for policymakers to consider when designing education policies because of the differing influences of place on individual choice and action (Brown & Schafft 2011; Burkell & Saquinur 2015; Hillman 2016; Kryst, Kotok & Hagedorn
2018; Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2019; Petrin, Schafft & Meece 2014; Rude & Miller 2018).

a. Social Constructions: Interacting with the Rural Place

Over time, the boundaries of rural and metropolitan America have grown increasingly fluid. Advances in transportation and technology have redefined the rural lifestyle by increasing mobility and the elasticity of place for many rural people (Barcus & Brunn 2010; Hobbs 1992; Lichter & Brown 2011; Milbourne & Kitchen 2014). However, rural schools and districts continue to be found in “profoundly dissimilar settings with profoundly dissimilar populations” (Eppley 2009, p. 8). Many of the “nuances of what it means to live and teach in a rural setting” are overlooked in the term “rural” which refers to a range of diverse communities and peoples across the United States (Cromartie & Bucholtz 2008; Flora & Flora 2008; Sindelar, Pua, Fisher, Peyton, Brownell & Mason-Williams 2018, p. 13; Scribner 2015).

Rural communities across the United States reflect many similar traits associated with their small size, limited social institutions, and overlapping social networks that tend to foster common approaches and orientations toward education, schooling, and life in general (Bouck 2004; Budge 2006; Grineski 2013; Harmon & Schafft 2009; Howley & Eckman 1997; Slama 2004; Storey 1993; Tieken 2014). Rural students may face many challenges in gaining a sound education, ranging from poverty and socioeconomic struggles in their personal lives to limited curricular options, funding, and technology in their schools (Bouck 2004). Differences in access and resource allocation persist in many rural communities, and rural school districts in the United States serve larger percentages of students living in poverty than all urban and suburban school districts combined (Bouck 2004; Virgil 2010). However, rural communities are far from homogeneous (Bauch 2001; Bouck 2004; Budge 2006; Eppley 2009; Flora & Flora 2008;

Across rural places, traditions and customs vary, and “each area’s particular customs and traditions are a treasured part of how people from that place think and act” (Slama 2004, p. 9-10). Rural is defined as much by geographic boundaries as it is by experience and culture. “[I]t’s this feeling—something beyond the size of a population or its proximity to a city” that best describes rural as a particular way of life (Tieken 2014, p. 5). “Americans often think of rural places as the ‘antithesis’ of the modern urban world” (Lichter & Brown 2011, p. 368).

Popularized descriptions of rural America often come with assumptions of decline, outdatedness, and feelings of nostalgia over the “idyllic little red schoolhouses” of the past (Grineski 2013; Sher 1977a; Tieken 2014; Zimmerman 2009). Tieken (2014) explains two myths dominate commercialized depictions of rural America today:

The first is about deprivation and decline: “rural” is backwoods, backwater, and backward, its residents assumed to be ignorant, lawless, and provincial, its communities little different from those portrayed in the movie Deliverance. The second myth draws from a romantic nostalgia: this “rural” is equated with uncomplicated simplicity, with some sort of lost golden age, an image that, while kinder, is no more accurate than the first (p. 7).

Many people today continue to have little or no direct contact or experience with rural people or communities, instead forming their understandings of “rural” from encounters with commercialized images (Lichter & Brown 2011). As a result, popular cultural myths of rural communities tend to persist among the general public, perpetuating mischaracterizations of place (Theobold & Wood 2010).
Limited attention to the influences of place in pre-service teacher preparation program coursework may help maintain many of the social constructions of rural places in education and schooling (Azano & Stewart 2016; Mitchell, Olsen, Hampton, Hicks, Long & Olsen 2019; Mofta & McHenry-Sorber 2018). For example, pre-service teachers with rural backgrounds may face tensions between the rural contexts they know from their formative experiences and the characterizations of rurality presented in their coursework (Mofta & McHenry-Sorber 2018). In teacher education programs, attention to place is often limited in discussion unless linked to pressing social issues, such as poverty or drug use, which tend to problematize rural schools and communities for pre-service teachers. The particular challenges of rural schools – such as teaching multiple subjects and grade-levels – are often absent from programs, likely because they are not applicable to urban and suburban settings (Mofta & McHenry-Sorber 2018).

Other scholars have argued rural teaching presents a host of educational challenges for schooling in rural America, ranging from limited rural-specific educational preparation to feelings of isolation for new teachers not accustomed to the rural lifestyle (Bouck 2004; Burton, Brown & Johnson 2013; Eppley 2009; Horn 1985; Lowe 2006; McCracken & Miller 1988; Meier & Edington 1983; Sher 1983). Rural teachers “tend to be less experienced, more likely to teach outside of their content area, less likely to have majored in their teaching content area, and less likely to have graduate degrees” than their metropolitan counterparts (Bouck 2004, p. 40). Rural teachers must connect course content to their students’ lives and also serve as a bridge to the larger world and options for rural youth outside of their local communities – which can be especially difficult for teachers unfamiliar with the rural place (Azano & Stewart 2016; Burton, Brown & Johnson 2013; Cubberley 1914; Horn 1985; McCracken & Miller 1988; Meier & Edington 1983; Sher 1983; Waller & Barrentine 2015).
However, the presence of rural pre-service teachers in preparation programs may combat simplistic thinking about locales and counter prejudices and stereotypes by increasing teacher consciousness of place and reducing deficiency-thinking (Azano & Stewart 2015; Azano & Stewart 2016; Mofta & McHenry-Sorber 2018). Place-based consciousness is important for rural teachers to make connections between standardized curriculum and the lives of rural youth (Waller & Barrentine 2015). Dunne (1977) drew attention to the metropolitan-orientation of curriculum decades ago, finding American rural teachers in the 1970s looking for resources for their students “must generally be resigned to teaching about fire hydrants, manicured lawns, skyscrapers, and other accoutrements of life in metropolitan America” (p. 101). Nearly forty years later, Waller & Barrentine (2015) found standardized curriculum continued to marginalize the rural student (see also Theobold & Wood 2010).

In their study of a third-grade reading program, Waller & Barrentine (2015) found the single rural-based story portrayed “rural life in a folksy and perhaps obsolete manner” where the main character “Pa” raises “tomatoes, corn, peas, barley, wheat, sheep, cows, pigs, and chickens”, wears “bib overalls” with his daughter, and “uses phrases such as ‘What in the tarnation?’” (p. 5). Teachers had to rely on their own personal backgrounds to connect the reading with their students’ lived rural experiences, while the standardized curriculum perpetuated rural stereotypes (Mofta & McHenry-Sorber 2018; Waller & Barrentine 2015). Some scholars argue these stereotypical depictions show an acceptance of unchallenged social constructions that may lead rural youth to internalize messages of subpar educational quality in their communities, despite not holding up to minimal scrutiny (Theobold & Wood 2010).

Rural outmigration and the phenomena known as the “Rural Brain Drain” suggest rural teachers and their larger communities may also face a “paradox of preparation” in the schooling
of their youth” (Petrin, Schafft & Meece 2014; Schafft 2016). Unlike metropolitan students who can pursue professional opportunities close to home, rural students are more likely to believe leaving home permanently is important for their lives (Petrin, Schafft & Meece 2014; Seal & Harmon 1995, see also Carr & Kefalas 2009). However, student connection to place is important for the vitality of rural communities. Strong social norms exist to encourage rural youth to leave their communities – especially the most talented – but an ambivalence exists within rural communities that leaves educators supporting the outmigration of youth in hopes of their eventual return (Petrin, Schafft & Meece 2014).

Rural educators and communities must recognize the human capital being cultivated in their local schools will likely be exported to non-rural communities, rather than bettering the local community. However, the potential that rural students may someday return is often seen as an important means of future community stability (Petrin, Schafft & Meece 2014). Financial concerns are often the deciding factors among students who choose to leave rural areas and pursue employment elsewhere, while a “sense of place” is among the leading considerations for those who choose to stay (Moeller, Moeller & Schmidt 2016). The prospect of return may be predicated on attachments to place developed during youths’ formative years (Petrin, Schafft & Meece 2014).

Attachments to place are a feature of an individual’s place-based identity, developed through their social interactions within a particular place (Barcus & Brunn 2010). For rural youth, place-based identities are rooted in a shared culture of rurality. Rurality is the nonmaterial structure, or culture, that influences the norms, networks, and meaning-making of the rural place (Brown & Schafft 2011; Burton, Brown & Johnson 2013; Eppley 2009; Green & Letts 2007). As a form of place-based identity, rurality is a shared cultural value derived from “a
collective understanding about social identity intertwined with place meaning” (Barcus & Brunn 2010, p. 284; Budge 2006; Eppley 2009; Theobold & Wood 2010). That is, rurality is a cultural product built from the interactions of a particular geographic place that defines social relationships, adherence to norms, philosophies, and other features of individual identity, as well as personal attachments and preferences for particular places (Brown & Schafft 2011; Theobold & Wood 2010).

Place-based identity is elastic in the modern era (Barcus & Brunn 2010). Alongside the growth of transportation and technology, the ability of rural residents to maintain virtual connectivity with rural communities without giving up distant economic and social opportunities has allowed them to maintain engagement even without physical residency (Barcus & Brunn 2010). Place-based identity may persist irrespective of actual location; meaning, individuals form preferences and worldviews, in part, from the geographic place of their formative years that stay with them even after they leave (Barcus & Brunn 2010). Rurality is developed from the specific interactions of the rural place, which can differ significantly from those of the urban place (Becnal & Moeller 2015; Brown & Schafft 2011; Burkell & Saqinur 2015; Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2019; Theobold & Wood 2010). In either case, the culture of a place shapes the education and schooling within by influencing the identities, choices, actions, and opportunities for individuals.

b. Differences across Place

In a review of all topics of research in rural education from 1991 to 2003, Arnold, Newman, Gaddy & Dean (2005) concluded the lack of consistent definition of “rural” made it virtually impossible to compare the few rural studies published or to reliably inform policy and practice based on the collective findings. Recent comparative studies across the rural-urban
continuum have revealed significant differences exist across place, although scholars typically rely on standard Census-based locale designations. These findings share the conclusion that the rural-urban divide constitutes more than a geographic boundary, but distinct cultural understandings of education that shape identities, educational trajectories, opportunities, and the lifestyles of individuals (Brown & Schafft 2011).

Students in urban places and students in rural places are not all that different, but differences exist in their personal awareness and styles of interaction (Becnal & Moeller 2015; Burkell & Saqinur 2015). Teenage literacy habits are one example of differences across the rural-urban continuum. Rural teens often have to travel farther distances to acquire reading materials but have similar interests in their personal readings as metropolitan teens (Becnal & Moeller 2015). However, more so than their metropolitan peers, rural teens may have a stronger preference for print and distaste for e-reading, encounter more stereotypes of “rural life” that hamper their ability to relate to the text, and have fewer opportunities to engage in literary discussions in their communities and homes (Becnal & Moeller 2015; Waller & Barrentine 2015). Among teenage students, these differences in both preferences and opportunities each correlate with differences in place (Becnal & Moeller 2015).

Social media and technological advances in recent years have changed the opportunities and interconnectedness of students across all places, however place-based differences in social interaction may still exist among teenagers and young adults (Burkell & Saqinur 2015). Female rural teenagers, for example, may be more aware of their “ruralness” than their urban peers—despite an indistinguishable use of social networking. Urban females, in contrast, may tend to be “oblivious to their own ‘urbanness’” in their social lives largely because of how “decidedly different” their living environments are from rural youth (Burknell & Saqinur 2015, p. 136). The
physical, social environment for rural girls and young women influences their engagement with conflict online simply because fewer alternatives to real-world interactions exist in their lives (Burkell & Saqinur 2015).

In online disagreements, Burkell & Saqinur (2015) found rural girls often prefer to take the discussion offline and engage in face-to-face interactions, while urban girls may be more likely to escalate the conflict online. “Rural girls indicated that face-to-face interaction was preferable because it gave them better opportunity to assess, and limit, the impact of their comments or responses” while “urban girls appeared to prioritize ‘winning’” the argument over resolving it amicably (Burkell & Saqinur 2015, p. 144). The smaller, less populated rural places meant rural girls could not afford to alienate friends through social media, unlike urban girls who had more social opportunities available. As a result, differences in social behavior and conflict resolution – both in-person and online – may correlate with differences in place.

Other scholars have found differences in how students engage with society are shaped by disparities in access and services, as well as differences in community stressors across locales (Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2019). Differences across the rural-urban continuum are not limited to individual behavior and preferences, but seen in broader social and structural realities of place as well (Boyd et al. 2005; Hillman 2016; Kryst, Kotok & Hagedorn 2018; Mello, Goldman, Urbano & Hodapp 2016; Miller, Votruba-Drzal & Coley 2019). Economic disparities and poverty, for example, differ across place with notable influences on the education and development of rural and urban children, but these place-based differences may also influence the effectiveness of policy solutions and design (Miller, Votruba-Drzal & Coley 2019).
For rural communities, poor children are often resource-deprived but generally buffered from the effects of violent crime and disadvantage, partially through a closer proximity to nature which reduces the influence of many stressors (Miller, Votruba-Drzal & Coley 2019). Increased senses of community, demonstrated through stronger community ties and attachments to place, often serve as an additional buffer from disadvantage in rural areas by increasing access to limited resources for individuals, schools, and families. These differences among place-based stressors and buffers may have a direct relationship with the effectiveness of policy design (Miller, Votruba-Drzal & Coley 2019). For example, in urban inner cities, buffers from neighborhood stressors may be most beneficial for the education and development of children and youth, whereas in rural communities, providing resources and access to services is needed more. In either case, place, as a conveyor of stressors and resources, may have a significant relationship with the efficacy of policy solutions (Miller, Votruba-Drzal & Coley 2019).

Access to services, in particular, is a critical difference across place that often disadvantages rural communities. Policy challenges tend to be accentuated in rural schools because of their typically limited access to specialized resources and personnel, compared to what is generally available in metropolitan areas (Rude & Miller 2018). The costs of being “geographically handicapped” are “inherently and inevitably higher than the costs of providing the same services in more densely populated areas” (Sher 1983, p. 259). Rural and non-rural families and educators tend to have access to the same number of services for students with autism, for example, but significantly fewer rural families can take advantage of them because the services may not be available in their immediate area (Mello, Goldman, Urbano & Hodapp 2016).
Mello, Goldman, Urbano & Hodapp (2016) found rural families may experience significantly greater difficulty in accessing the necessary services and trained professionals for students with autism and often need to travel more than twice as far as non-rural families for a majority of the services offered to them. Rural families may also be less likely to have access to support groups in their area and specialized personnel and services, while rural educators face limited access to resources and specialized training and professionals for their students with autism (Mello et al. 2016). However, Mello et al. (2016) found no difference in the reported satisfaction of services between rural and non-rural respondents in their study, suggesting rural and non-rural families have different perceptions of their needs. Thus, differences across place may also shape individual perceptions of need and satisfaction with supports, similar to the influences of place on social preferences, interactions, and individual choice and action (Mello et al. 2016).

Many scholars have been consistent in concluding that important differences exist “between urban and rural schools that can influence the educational experiences of students” and policy design could be improved to account for such differences (Haas 1990; Hamilton, Hamilton, Duncan & Colocousis 2008; Isserman 2007; Kryst, Kotok & Hagedorn 2018, p. 2; Miller, Votruba-Drzal & Coley 2019; Sipple, Francis & Fiduccia 2019). Urban schools are “not rural schools writ large” nor are rural communities similar to urban neighborhoods (Bauch 2001, p. 204). The remoteness of place may have influences at the individual, social, and structural level for students, educators, schools, and policymakers, thus introducing the need for policies to be more attentive to place (Brown & Schafft 2010; Green & Letts 2007; Hamilton, Hamilton, Duncan & Colocousis 2008; Rude & Miller 2018).
II. Policy as Symbolic and Purposive

Policies are cultural products. The problems they depict, the solutions they propose, and the rationales they put forth are as much imagery as action (Malen & Knapp 1997). Policies are complex systems of belief and representation that convey social and cultural meaning across society (Asen 2010; Stein 2004). Implicit policy assumptions can have a greater impact on target populations than stated policy objectives because “how a social problem is cast makes a big difference in how one responds to it” (Reese 2003, p. 8). Policymaking is a strategic enterprise to create meaning and encourage a specific understanding of a perceived problem (Airasian 1988; Hertog & McLeod 2003; Malen & Knapp 1997; Reese 2003; Rosen 2009). As a result, some assumptions may unavoidably enter into the policy process.

Policies gain legitimacy from how well dominant values and goals are incorporated, whether or not they have any power to enact real change (Airasian 1988; Malen & Knapp 1997). Policies establish a cognitive structure of meaning in society – a framework of shared principles to make sense of the complex social world and become the basis for social action (Hertog & McLeod 2003; Reese 2003; Rosen 2009). Ultimately, policies go beyond immediate situations to “speak to a broader way to account for social reality” as cultural products designed to resonate with dominant cultural understandings (Reese 2003, p. 12).

Yet policies are always incomplete accounts of reality, which leads them to become producers of culture themselves (Reese 2003; Rosen 2009; Stein 2004). Policies construct meaning that transcends specific situations and become naturalized perceptions of “how things are” in society (Hertog & McLeod 2003; Levinson, Sutton & Winstead 2009; Reese 2003; Rosen 2009). Social constructions are central to policy design. In defining a problem and proposing a solution, policymakers create policies that “construct a way of seeing those affecting or affected
by the problem” (Asen 2010; Stein 2004, p. 5). Therefore, policymakers wield power and influence over target populations in their framing of policy problems, solutions, and rationales in design (Levinson, Sutton & Winstead 2009; Rosen 2009).

A. Policy Cultures and the Rural School Problem

Social constructions of rural schooling in the United States, including rural education challenges and popularized policy solutions used today, may be rooted in rural education reform movements from the early 1900s. The “Rural School Problem” originated from a perceived need for a rural-specific approach to education in an industrializing nation (Betts 1913; Carney 1912; Cubberley 1912; Cubberley 1914; Foght 1910). In early 20th century America, education experts Mabel Carney and Ellwood Cubberley, defined the “Rural School Problem” as the inability of one-room, country schoolhouses to meet the “emerging social and economic needs” of modern society (Carney 1912; Cubberley 1912; Grineski 2013, p. 66).

Carney’s critique of rural schooling pinpointed metropolitan-oriented curriculum, untrained teachers, lack of administration, inadequate school buildings, and schools that “did not serve as community centers” as problematic for the education of students in rural America (Carney 1912; Grineski 2013, p. 25). Rural schools were not seen as serving the needs of rural youth and communities effectively. For Carney and other early rural education leaders, the rural school problem could only be solved through “redirected schooling,” or a complete transformation of rural schools and teachers to better align with the conditions of rural living (Betts 1913; Carney 1912; Cubberley 1912; Cubberley 1914; Foght 1910; Grineski 2013).

Carney and other early rural education reformers advocated for independent one-room schoolhouses to be reorganized into more centralized, consolidated districts that resembled the bigger schools of metropolitan America in the early 1900s (Grineski 2013).
However, contemporary scholars have suggested early rural school reform and the redirected schooling movement were “simply part of a larger agenda to urbanize and industrialize the countryside” (Grineski 2013, p. 68; Steffes 2008). Country schools were not being reorganized to better fit rural America but to better fit the newly industrialized, metropolitan nation. Thus, instead of fulfilling a rural vision of schooling, the reformers’ industrial visions of modern society led them to push urban-centric objectives and policies onto America’s rural schools and legitimize social constructions of rural education and schooling (Grineski 2013; Rosenfeld & Sher 1977; Steffes 2008; Tieken 2014).

Research on rural American teaching from the 1970s to 2010, for example, contains a dominant characterization of the “Rural School Problem” in education (Burton, Brown & Johnson 2013). Rural teachers tend to be labeled as isolated, lacking in education, and resistant to change, while rurality is often portrayed as an obstacle to obtaining a good education. The “oversimplification of the rural classroom, as opposed to the urban and suburban one, is almost taken for granted without data or research to support or refute their claims” and characterizations of the “Rural School Problem” have persisted over the past century – despite the evolution of the one-room schoolhouses that were targeted for reform in early 20th century America (Burton, Brown & Johnson 2013, p. 8; Grineski 2013; Kannapell & DeYoung 1999; Tieken 2014).

The policy process frames the “way we see” populations served by policies (Stein 2004, p. 11). Policymakers tend to emphasize “deficiencies, weaknesses, and lacks” that cast targeted beneficiaries as problematic and in need of government intervention in order to “improve” (Stein 2004, p. 17). Stein’s (2004) culture of policy framework focuses on how implicit policy assumptions find support, are encouraged in practice, and persist over time by examining “the procedures and assumptions built into the policy process” and their influence on individuals and
institutions (p. 12). Social and economic agendas and “popularized scholarship at the time” of policy development influence the formulation of policy proposals (Stein 2004, p. 15). The historical moment reveals the anxieties and concerns of the population, their motivations for policy initiatives, and dominant beliefs in the role of the government and public schools in society. Yet time, personnel, and resources are always limited. Institutional arrangements condense proposals down to features a policy can realistically address based on the organizational structure of society at the time of formation (Stein 2004).

A difference exists “between making meaning (policymaking) and maintaining and enforcing meaning (policies)” (Asen 2010, p. 129). Policy problems “remain salient only as long as their symbolic meaning has potency” for key audiences (Malen & Knapp 1997, p. 391). Therefore, elements of policy cultures are not stagnant (Stein 2004). The “language and rituals of practice” constructed in policy design transform through interplay with government, schools, and public responses to implementation that “feed back into the next iteration of policy” (Stein 2004, p. 20). As a result, social constructions and implicit assumptions in policy design “become part of the daily vocabulary” in policymaking and gain a sense of legitimacy in the social order (Stein 2004, p. 3).

Stein’s (2004) framework focuses on policymaking as a cultural process and policies as cultural products, defined and interpreted by dominant ideologies of a given time. In education, the design and negotiation of education policies may be influenced by the understandings people hold of the schooling of youth within particular places (Kryst, Kotok & Hagedorn 2018). In an increasingly urbanized world, place is relevant to the formation of policy cultures because the urban voice may dominate in policy design with undue consequences for rural schools and communities (Jakubowski 2019; Johnson & Howley 2015; Tieken 2014).
B. Rural Education Policy Culture in the United States

Literature chronicling rural school reform throughout the 20th century organized into Stein’s (2004) conceptual model reveal potential features of a culture of rural education policy in the United States. Three critical events justified the need to “save” rural schools in early 20th century America:

1. The Report of the Committee of Twelve on Rural Schools (1897)
2. Roosevelt’s Commission on Country Life (1908)
3. The Progressive Education Movement (roughly 1890 to 1920)\(^6\)

The identification of the “Rural School Problem” is attributable to the report of the Committee of Twelve on Rural Schools “lamenting the rural school problem” in 1897 (Grineski 2013, p. 69; Steffes 2008). Subcommittees on school maintenance, supervision, supply of teachers, instruction, and discipline all reported inadequacy, inefficiency, lack of resources, and limited capacity across America’s rural schools (Cubberley 1912; Grineski 2013; National Education Association 1897). Silver & DeYoung (1986) argued the Committee’s report was an ideological attack on virtually every feature of rural schooling. The Committee concluded the isolation of rural schools was primarily to blame and recommended collecting rural pupils into larger schools – sparking early support for redirecting schools with an emphasis on consolidation (National Education Association 1897).

A decade after the release of the Committee’s report, President Theodore Roosevelt’s Commission on Country Life named the state of rural education as the leading source of

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\(^6\) The Country Life Movement (roughly 1900 to 1920) occurred as part of the larger Progressive Era with an explicit focus on improving the conditions of rural life in the United States. While early rural school reforms were more accurately born of the Country Life Movement, the leaders of the period were influenced by larger progressive ideals (see Danbom 1979 for the Country Life Movement; see Grineski 2013 or the early works of Bailey 1911, Carney 1912, and Cubberley 1914). The rural education policy culture, therefore, is better understood as owing to the broader social movement of progressivism in early 20th century America.
deficiency in rural America (Ellsworth 1960; Foght 1910; Grineski 2013; Steffes 2008).

Roosevelt’s Commission was appointed “to study the problems of rural life and generate recommendations to remedy deficiencies” (Grineski 2013, p. 47). “No other subject loomed as large as education” in the Commission’s investigation, and their main recommendation was the redirection of rural schools (Ellsworth 1960, p. 165).

Some scholars argue Roosevelt’s Commission reflected the beliefs of the larger progressive social movement at the time of the policy culture’s historic moment that drove consolidation-based, redirected school reforms across the United States (see Grineski 2013, Leo-Nyquist 2001, and Silver & DeYoung 1986). Members of the progressive education movement believed reformed schools would improve the social order by addressing the “Rural School Problem” through redirected schooling, thus legitimizing policy proposals for reorganization (Carney 1912; Cubberley 1914; Grineski 2013). The redirected schooling ideas of progressive educators therefore served as “the catalyst for directly applying rural school improvement ideas nationwide” earlier identified by the Committee of Twelve and Commission on Country Life (Grineski 2013, p. 76).

Alongside the historical moment, education historians and scholars of the late 20th century suggest proposals for redirected schooling were shaped by three key institutional arrangements of the time:

1. Shifting control over schools increasing the need for State aid.
2. Growing transportation opportunities in a newly industrialized nation.
3. Measuring efficiency through school organization and the factory model.

Each of these arrangements reflect structural and social developments of the industrialization of the nation, with an emphasis on the factory model and efficiency guiding educational reform.
First, state authority, and, specifically, steady streams of state funding may have encouraged the adoption of redirected schooling policies in the United States. By the close of the 19th century, issues of education policy were “increasingly being resolved at the state level” (Rosenfeld & Sher 1977, p. 21; Steffes 2008). For most of American history, locally-elected school boards held decision-making authority over matters of education policy and schooling. State governments mandated public education yet lacked capacity for meaningful control, but institutional arrangements began to change in the early 20th century (Scribner 2015). As control over schools shifted to the state-level, local school districts began to need greater financial assistance to operate (Carney 1912; Cubberley 1912).

State aid was introduced and increased “to stimulate educational change” in the early 20th century (Rosenfeld & Sher 1977, p. 28). Rural school districts, in general, are both “poorest in property” and “poorest in income” compared to urban and suburban districts – with significant implications for their educational capacity and ability to keep up with the rising costs of education (Tompkins 1977, p. 141; see also Betts 1913, Carney 1912, and Cubberley 1912). Streams of state aid quickly became crucial for small rural school districts to operate, but as the amount of state aid increased so too did the “strings” attached for receiving school districts (Rosenfeld & Sher 1977, p. 28; Steffes 2008; Tompkins 1977). Impoverished rural schools in need of funding had little option but to heed state educational mandates for continued aid as a result (Seal & Harmon 1995; Steffes 2008).

Industrialization also created new opportunities for travel across the changing landscape of early 20th century America. For rural communities, advances in transportation completely
redefined the countryside (Cubberley 1912; Grineski 2013). The growth of the transportation industry chipped away at the isolation of rural communities and introduced new possibilities for rural schooling, specifically for consolidating the one-room schoolhouses that previously dotted the countryside. Improving and increasing transportation was essential for reorganizing rural America’s schools because the ability to consolidate and centralize schools depends on how far students can be transported – and at what cost (Betts 1913; Carney 1912; Cubberley 1912; Howley & Eckman 1997; Rosenfeld & Sher 1977). The consolidation movement only became feasible when industrial-age advances in transportation made it possible for rural youth to travel farther distances to larger, centralized schools (Carney 1912; Grineski 2013).

Finally, progressive ideals for education behind the redirected schooling movement were guided by an industrial vision of more efficient schooling (Cubberley 1914; Kannapel & DeYoung 1999; Leo-Nyquist 2001; Silver & DeYoung 1986). Industrialization established a business-centered vision for measuring efficiency in social institutions across the nation (Betts 1913; Callahan 1962; Cubberley 1914; Danbom 1979; DeYoung & Howley 1990; Haas 1990). As social institutions, public schools became “the target of reform efforts tied to principles of technical rationality” and school organization “began to reflect the new social relationships of industry” (Callahan 1962; DeYoung & Howley 1990, p. 73; Kannapel & DeYoung 1999; Rosenfeld & Sher 1977, p. 16; Silver & DeYoung 1986). Progressive educators believed the centralization and professionalization of schools would establish a more efficient administrative structure for schooling in rural America, positioning the organization of schools as a focal point of reform (Cubberley 1914; Danbom 1979; Kannapel & DeYoung 1999).

The changing institution of schooling in 20th century America produced a policy culture with three defining features:
1. Characterization of the “Rural School Problem”

2. Belief in larger public schools as more efficient

3. Commitment to urbanization as progress

Research and discourse on rural education since the turn of the 20\textsuperscript{th} century often emphasizes the inadequacy, inefficiency, isolation, and problems of rural school buildings, funding, supervision, teachers, and students, as previously discussed (Bailey 1911; Betts 1913; Carney 1912; Cubberley 1912; Cubberley 1914; Ellsworth 1960; Foght 1910; Grineski 2013; National Education Association 1897; Rosenfeld & Sher 1977; Sher 1977b; Tieken 2014; Tompkins 1977; Weaver 1977). Further, efficient schooling in early 20\textsuperscript{th} century America was evaluated by economies of scale, under which larger schools were seen as more efficient, having more resources, and expanding course offerings for rural students – thereby positioning the main proposal for improving rural education as the consolidation of rural schools (Carney 1912; Cubberley 1912; Howley & Eckman 1997; Theobold & Wood 2010; Tompkins 1977).

Finally, scholars have argued policymakers held an “ideology that equated urbanization with progress” despite their stated intentions of improving rural schools to better align with the needs of rural communities (Danbom 1979; Grineski 2013; Sher 1977b, p. 273; Theobold & Wood 2010). “All of these educational reformers deemed urban education superior, urban children more advantaged, and urban models appropriate for rural implementation” (Danbom 1979; Rosenfeld & Sher 1977, p. 22). Policy proposals reflected industrial-age pushes for urbanization in the form of centralization and professionalization of country schools (Cubberley 1914; Howley & Eckman 1997; Kannapel & DeYoung 1999). “Progress” meant keeping up with the nation’s growing cities (Bailey 1911; Haas 1990). As a result, education policy in rural America may have been driven by urban demands (Kannapel & DeYoung 1999; Tieken 2014).
These traits guided rural education policy through the redirected schooling movement and may continue to justify like-minded policies today (Tieken 2014). The consequences of these defining features on language and practice are the final elements of the culture of rural education policy:

1. Social constructions of rural schools and schooling based on commercialized stereotypes (Tieken 2014).
3. Overreliance on consolidation as de facto state education policy hindering consideration of alternative methods of reform (Howley & Eckman 1997).

Figure 2.1 shows a model of the policy culture for rural schooling in the United States, adapted from Stein’s (2004) culture of education policy, to illustrate the features discussed in this section and the interaction of these elements with public schools and state governments to inform language and rituals of practice in policymaking.
Stein (2004) argues the “culture of policy can lead to practices that run counter to the intended policy goals with cultural consequences that often go unnoticed” (p. 20). In the redirected schooling policy movement, state governments and local schools continually fed into the policy culture over time, encouraging the maintenance of the “Rural School Problem” and acceptance of commercialized images of rural America, discussed in earlier sections of this review.

The overreliance on consolidation in state education policy exemplifies the relationship between place and policy in education, as well as the influences of dominant ideology in policy design. Contemporary research has revealed the unintended effects of the scientific management of schooling, including “more red tape, teacher disconnectedness, increased discipline problems,
and decreased parental involvement” in the education of rural youth (Cooley & Floyd 2013, p. 50). These effects may be attributable to consolidation policies and practices that have left students with less individualized attention in class, longer bus rides, and fewer opportunities to participate in extra-curricular activities (Cooley & Floyd 2013, p. 48). In 1977, Sher & Tompkins concluded:

> While the policy of rural school and district consolidation is not totally devoid of worth, its strengths were greatly exaggerated, its weaknesses often ignored, and its overall merits as a strategy for educational reform and improvement grievously overstated and oversold (p. 75).

However, the close of the 20th century has not ended perceptions that rural schools are too small to be competitive in the modern era, thereby encouraging continued pushes for consolidation policies (Bard, Gardener & Wieland 2006; Bouck 2004; DeYoung & Howley 1990; Howley & Eckman 1997; Theobold & Wood 2010).

Research on contemporary rural school consolidation has been largely unable to provide conclusive empirical evidence in support of the educational improvements consolidation practices purported (Bard, Gardener & Wieland 2006; DeYoung & Howley 1990; Haas 1990; Kannapel & DeYoung 1999; Seal & Harmon 1995; Theobold & Wood 2010). Instead, gains in education achievement resulting from rural school consolidation have been “either statistically or practically insignificant” and tend to be offset by concurrent reductions in student educational experiences, notably in the performance of students from receiving districts and extracurricular involvement by displaced students (Cooley & Floyd 2013; Howley 2000; Mills, McGee & Greene 2013, p. 14). Yet consolidation practices continue in rural places today, with the state of
Vermont, for example, undergoing the recent statewide consolidation of rural school districts following the passage of a landmark school reorganization bill, Act 46, in 2015 (“No. 46” 2015).

New York State’s longstanding support for rural school consolidation – documented in the State’s 1958 Master Plan for School Reorganization – provides an example of the persistence of the policy culture and its underlying ideology in state education policymaking. Leading up to the passage of New York’s Master Plan for School Reorganization, urban education experts emphasized the benefits of consolidating rural school districts as a way to enhance the efficiency of schooling statewide, and state policymakers agreed (Jakubowski & Kulka 2016). New York’s 1958 Master Plan officially documents the State’s support for school consolidation and still stands today. However, despite continued support and multiple commissions calling for greater efficiency through school consolidations across the state, New York has not successfully consolidated many small rural districts (Jakubowski & Kulka 2016).

In New York State, each time a commission was appointed to make recommendations for rural schools, their findings added pressure and urgency for rural school districts to find proactive strategies for survival. Yet media portrayal and stereotypical representations of rural communities have steered the focus of rural educational research toward deficits in rural places (Jakubowski & Kulka 2016). Jakubowski & Kulka (2016) found New York’s rural schools have developed creative solutions to the problems they face and demonstrated efficiency in preparing rural youth for the wider world, arguing the State’s 60-year support for school consolidation is outdated, ineffective, and overlooks the creativity and merits of New York’s rural schools. The continued support instead suggests a contemporary maintenance of the culture of rural education policy rooted in early 20th century reform. Thus, the possibility exists that state education policies may still be influenced by features of the rural education policy culture today.
C. Place-based Ideology in Policy

Policymakers are almost always “outside” the target communities, which opens the potential for biases and stereotypes to enter policy design as problems are interpreted and solutions are proposed (Schneider & Ingram 1988; Stein 2004). In policy formation, “definitions of the policy problem are influenced by the policymakers’ proximity to the issues, their understandings of the local community and economic structures, and their own investment in the matter at hand” (Stein 2004, p. 4). If policymakers are not attentive to the potential use of social constructions and stereotypes in policy design, policies can perpetuate and legitimize misunderstandings of target places and people (Hertog & McLeod 2003).

Some scholars argue the educational standards of early rural education reformers were urban standards that viewed city life as having reached higher levels of development, greater civilization, and more satisfying and efficient living (Bailey 1911; Danbom 1979). With industrialization, control of the policy arena tipped in favor of urban interests (Theobold & Wood 2010). “City-school ideals began to dominate all educational aims and practices” while policy measures and decisions were legitimated by cultural messages of rural deficiencies and outdatedness (Cubberley 1914, p. 92; Theobold & Wood 2010; Tieken 2014). By identifying the “Rural School Problem” and advocating for “the adoption of urban educational standards, urban innovations, urban architecture, urban textbooks, urban curricula, and urban-trained teachers” early education leaders may have unintentionally guided policy and practices “toward a wholesale urbanization” of rural schools across the United States (Rosenfeld & Sher 1977, p. 11; Sher 1977b, p. 272).

Urbanism as a dominant ideology appears throughout literature on rural schooling in the United States and as a central feature of the rural education policy culture. Colwell (1970)
theorized that metro-centric models of education and policy are rooted in a dominant, but unchallenged, commitment to urbanism. Urbanism is a dominant way of life that shapes beliefs and approaches to education and acts as a blinder, thus preventing individuals from critically considering its consequences. Colwell (1970) argues individuals fall victim to an unintentional urban bias with the absence of critical appraisal of urbanism as ideology. Educators accept a “mass-urban” framework as the only option for education and schooling and focus on designing an “appropriate education” to fit this urban reality (Colwell 1970). Yet the aims and purposes of urbanism have never been thoughtfully evaluated. As a result, education policies and recommendations lack recognition of urban limitations, thereby resembling commitments to urban ideology (Colwell 1970).

Thomas, Lowe, Fulkerson & Smith (2011) and Jakubowski (2019) conceptualize preferences for urbanicity in New York State as urbanormative. The concept of urbanormativity positions urban life as “normal and desirable” and rural life as “deviant and abnormal” (Fulkerson & Thomas 2014; Jakubowski 2019, p. 5; Thomas et al. 2011). In this juxtaposition, the ideals of urban areas became “the standard” and are accepted as default, while rural areas are “in need of remediation” to bring them in closer alignment with urban ideals (Jakubowski 2019, p. 1). Urbanormativity is a cultural assumption that a dominant urban way of life leads policy and practice to favor the interests of cities over the countryside (Thomas et al. 2011).

The structure of urban dominance is rooted in the process of urbanization. That is, urbanormativity manifest when the “real” rural is replaced by a manufactured rural aligned with what the urban culture thinks “rural” ought to be (Thomas et al. 2011). Thomas et al. (2011) argues problems of urbanization can only be solved through more urbanization – akin to Colwell’s (1970) endless progress element (see also Fulkerson & Thomas 2014). The problem
with urbanormativity is other, competing worldviews exist. Urbanormative policies and approaches position efficiency above all else in school systems, which may contradict what rural communities need to survive. Therefore, policymakers need to be cognizant of the place-based worldviews that underlie policy decisions (Jakubowski 2019).

Commitments to urbanization began to gain traction in the Industrial Age but continued with new phases of nationalization and globalization of schools in the contemporary era (Kannapel & DeYoung 1999). Research on rural education has increased in recent years but continues to be overshadowed by urban-focused studies, while the pressure on policymakers to address rural education challenges is rising (Rude & Miller 2018; see Arnold et al. 2005 and Burton, Brown & Johnson 2013). “Though the current process of governmental intervention in rural schools may be less intentional than the naming of “rural problems” and rural solutions in the 1900s – and is certainly less explicit – it is no less real” today (Tieken 2014, p. 27). Johnson & Howley (2015) argue even rural-targeted education policies may not be addressing the needs of rural districts in the United States, leaving a persistent confusion among policymakers about what to do with rural education.

One source of the challenges facing rural schools may be that reforms are designed with urban schools in mind (Brant 2010). At the federal level, “contemporary education policy emerges from policymakers with largely metropolitan experiences” and “overlook rural realities” (Johnson & Howley 2015, p. 225). The language of “decline and disadvantage” dominates in state policy debates on rural places – even if the rural areas in question are not actually facing real decline (Isserman 2007). A “metrocentric vision” and models of policy wherein the modern city is the norm and bigger, centralized metropolitan schooling is the standard, tends to misunderstand or ignore significant economic and social questions and differences across place
Many scholars have concluded education policies demonstrate a preference for urbanicity and a neglect, mischaracterization, and/or misunderstanding of the rural place—akin to Colwell’s (1970) conclusion that educators are unaware of their commitments to urban ideology.

In December 2019, Bellwether Education Partners published an overview of schooling in rural America today, emphasizing the barriers posed by urban-centric education policies (Robson, Burgoyne-Allen, Squire & Schultz 2019). Rural schools face many similar challenges to their urban counterparts, such as poverty, but they manifest differently in rural communities because of the influences of geography on the appearance, persistence, and ability to respond to the problem. “Policies written with urban schools in mind often create additional barriers for rural schools” (Robson, Burgoyne-Allen, Squire & Schultz 2019, p. 40). Many common policy solutions present additional challenges for rural school districts—despite their benefits—because they are born from “urban-centric policy structures” (Robson, Burgoyne-Allen, Squire & Schultz 2019, p. 4).

For example, policy solutions aimed at increasing technology can improve access and opportunities for rural students. However, in the United States less than 60% of nonmetropolitan children have access to the Internet at home today, and many live too far away from their school to be able to rely on public broadband access (Robson, Burgoyne-Allen, Squire & Schultz 2019, p. 40). Geography creates unique challenges for rural school districts. Policies that overlook these challenges may produce more barriers than intended for rural schools and students as a result. In contrast, attention to place in policy design may increase the efficiency of policy solutions and equity of benefits and burdens allocated in policy measures (Beck & Shoffstall 2005; Robson, Burgoyne-Allen, Squire & Schultz 2019).
This review will use the term “metro-centric” to refer to findings related to commitments to urbanism, urban-favor or bias, and/or preferences for urbanicity in education policy. Increased attention to metro-centrism in education policy may be important for better understanding the differences in educational challenges and opportunities across place discussed in the first sections of this review. Fernandes & Neves (2010), for example, investigated the large-scale impact of urban-favored policy in economic development on the educational attainment of individuals across the rural-urban spectrum in Brazil, finding strong support for Lipton’s (1977) claim that “urban bias is a very strong source of socioeconomic inequality” in less developed countries (p. 283).

In Brazil, urban-biased economic development resulted in the concentration of public investment into urban areas of the country, thereby focusing education opportunities in urban areas to the disadvantage of rural communities and students – similar to “education deserts” in the United States (Fernandes & Neves 2010; see Hillman 2016). In analyzing eleven, five-year cohorts of approximately 109,000 individuals from the Brazilian National Household Sample Survey of 1988, rural origin was found to be a leading disadvantage in chances for educational opportunities, independent of all other demographic variables (Fernandes & Neves 2010). Metro-centrism in economic development may have increased the disadvantage of being raised in rural areas and the educational inequity in Brazil by influencing where opportunities were made available (Fernandes & Neves 2010).

\footnote{The language is not without disagreement, owing to the challenges in defining place discussed at the outset of this review. The Census Bureau differentiates metropolitan and nonmetropolitan areas based on their integration with a core metropolis and some scholars have pointed out that many rural-defined areas may more intuitively be viewed as urban centers—likely as a result of their adjacency and integration with a core metropolis (Geographic Areas Reference Manual 1994; Green & Letts 2007). While acknowledging the rural-classified places within metropolitan areas, this study will use the metropolitan-nonmetropolitan distinction to differentiate across place to emphasize the influences of remoteness from core metropolises on education and schooling.}
Rural schools and communities tend to face reform initiatives guided by educational leaders who may view “place (rurality) as presenting more problems than possibilities” in the lives of rural students (Harmon & Schafft 2009, p. 4; see also Budge 2006). Despite a few discussions on the rural disconnect in the education policy infrastructure, a gap remains in how researchers and policymakers might begin to identify, measure, evaluate, or address metrocentrism in education policy design (Gagnon & Mattingly 2015; Gilles 2017; Johnson & Howley 2015; Schafft 2016). However, the possibility exists that education policy in the United States may be designed from a metro-centric vision of schooling, to the disadvantage of rural schools, students, educators, and communities.

III. Framework for Analysis

Using a critical policy framework, some scholars have identified metrocentrism in federal and state policy that exemplify a “rural disconnect” in education policymaking in the United States (Eppley 2009; Johnson & Howley 2015). Critical policy analysis considers the criteria, objectives and core message, origination, and consequences of policies under the perception that policies are not neutral, but rather a product of context, norms, and dominant ideologies (Diem, Young, Welton, Mansfield & Lee 2014; Eppley 2009; Johnson & Howley 2015). Policies and the policy process are viewed as value-laden and evaluated for their subjective nature in critical policy analysis. Power and access to the policy process are examined to challenge “how knowledge, power, and resources are distributed inequitably” and the differences between policy rhetoric and realities in practice (Diem, Young, Welton, Mansfield & Lee 2014, p. 1072).

Critical policy analysis considers the underlying values of policy, its origins, and its consequences on schools and communities to expose dominant structures in a political world,
thereby allowing researchers to challenge what they see as “wrong-headed beliefs” about target populations, introduce alternative ways of thinking, and support changes in practice (Diem, Young, Welton, Mansfield & Lee 2014, p. 1079; Eppley 2009; Joo & Kwon 2010). Johnson & Howley’s (2015) critical policy analysis of three federal education policies in rural schools and communities understands policy as situated in specific contexts and their associated power dynamics, in which the “dominant group” within society is considered as those who control policy development. Eppley (2009) also used critical policy analysis to investigate the Highly Qualified Teacher (HQT) provision of No Child Left Behind (NCLB), finding the premise of a highly qualified teacher hinders dialog among scholars and policymakers about teacher quality by setting a presumption that a standard criteria is self-evident.

Under NCLB, the criteria for highly qualified teachers was set as holding a bachelor’s degree, possessing a teaching license, and having knowledge in every subject area taught. In many small rural schools, however, this standard proved difficult to achieve because, for example, the percentage of multi-subject teachers is generally higher in the small schools found in rural communities than in larger urban and suburban districts (Eppley 2009). The United States Department of Education (USDOE) responded to the challenge many rural schools faced in complying with the HQT provision with the passage of the Rural Flexibility Provision, which offered some veteran rural teachers a one-year extension to meet the requirements. Yet the Rural School and Community Trust found the flexibility provision excluded nearly 75% of America’s rural schools and notably prevented schools of the Rural Low Income School Program (RLIS) – which tend to be the hardest to staff and most impoverished – from qualifying for an extension (Eppley 2009).
The imprecision in defining “rural” and diversity of rural places across the United States was largely responsible for the shortcomings of the Rural Flexibility Provision. To qualify for the Rural Flexibility Provision, schools had to first qualify for the Small Rural Schools Achievement Program (SRSA), which stipulated the district have less than 600 students in daily attendance, on average, or be located in a county with less than ten people per square mile. Additionally, all schools in the district had to be located in communities with less than 2,500 people (Eppley 2009). These criteria meant rural schools in the Midwest and Great Plains regions would qualify – indeed, Oklahoma received over seven million dollars from SRSA for over three hundred school districts in 2008 – while most rural schools in more geographically diverse states would not, such as in the state of Georgia where only two rural schools qualified and less than $40,000 was awarded that same year (Eppley 2009). The HQT provision ultimately set a standard unreflective of quality teaching in rural places. Education policymakers were then unable to respond effectively because they neglected to consider the diversity of the rural place (Eppley 2009).

Policy implementation is contingent on the will and capacity of local districts (McLaughlin 1987). That is, the purposes of the policy need to matter at the local-level to incentivize the commitment of local actors, but the strategies must also be feasible given the resources and conditions of the target districts. The Small Rural Schools Achievement Program (SRSA) and Rural Low Income Schools Program (RLIS) are the pair of initiatives that compose the Rural Education Achievement Program (REAP). REAP was designed to help rural schools with personnel and resources to enable them to effectively compete for federal grants (Johnson & Howley 2015). Johnson & Howley (2015) argue the narrow restrictions of REAP are a clear example of an “ignorance of rural realities” by federal policymakers because of the
misunderstanding, or neglect, of the diversity of rural schools and communities across the United States.

Alongside REAP, Johnson & Howley (2015) found “the underlying logic and commitments of the reforms” in Race to the Top were also “incompatible” with living in rural places (p. 231-2). Race to the Top (RTT) left rural schools and districts citing transportation challenges, accelerated social and economic decline, and heightened difficulties in recruiting and retaining teachers all exacerbated under the prescribed strategies that emphasize transferring students, closing schools, and firing teachers and principals (Johnson & Howley 2015). Charter schools, for example, were a featured strategy for improving schooling under RTT. However, most rural communities do not have enough students or facilities for charter schools to be a viable alternative to the local school – unless as a complete replacement (Johnson & Howley 2015). Likewise, strategies resulting in the closing of schools could have dramatic consequences for the well-being of rural communities, where the local school is a key source of employment and social activity (Harmon & Schafft 2009; Johnson & Howley 2015; Lyson 2002).

Other RTT strategies that required moving students around or removing less-than-qualified staff neglected challenges related to the remoteness of rural schools and communities, such as the terrain students may have to travel from one school to the nearest next or the under-staffing that could result from raising qualifications (Johnson & Howley 2015). These strategies, however, were not exclusive to RTT. Following the 2008 recession and increased funding from the American Recovery and Reinvestment Act (ARRA), Title I School Improvement Grants (SIG) – a competitive grant program to help raise test scores in impoverished schools – mandated states target their “persistently lowest performing” schools and outline a plan for intervention based on one of the strategies of RTT (Johnson & Howley 2015). Ultimately, SIG
put forth interventional methods that were not viable in rural communities, particularly as they added to the human capital challenges already faced by rural schools struggling with teacher shortages (Jochim 2018; Johnson & Howley 2015).

Critical policy analysis emphasizes the social forces that shape the policy process. In traditional frameworks, policies are “value free” and a product of a planned, deliberate, and manageable process in which knowledge is obtainable and capable of being expressed to others, practices can be evaluated, and problems can be solved (Diem, Young, Welton, Mansfield & Lee 2014). Diem, Young, Mansfield & Lee (2014) argue traditional analysis contains no social theory of policy. Critical theory, in contrast, “is explicitly attentive to economic, historical, political, and social forces that shape and are shaped by the values of the dominant groups within a society” (Johnson & Howley 2015, p. 255). Critical policy analysis considers how policy is designed and developed by the dominant groups in society, recognizing contexts, norms, and the origins of problem definition and proposed solutions – though critical theory tends to be more abstract and not readily actionable in policy and practice (Diem et al. 2014; Harvey 2015).

Critical theory frameworks posit certain populations are oppressed while others are oppressors (Thomas et al. 2011). Critical policy analysis is “overtly political work” to expose inequities based on the assumption that schooling is not immune from political and social influences (Eppley 2009, citing Taylor 1997 and Purdy 1985). However, the unintentionality of metro-centric influences in education policy design does not fully align with the underlying assumptions of oppression and power in critical theory, instead calling for specific attention to the elements of policy design. Critical theorists are “not especially interested in the specifics of policy design” despite findings that policymakers actively engage in the formation and perpetuation of dominant societal values as they design and justify policies (Ingram & Schneider
2011, p. 70). As a result, examining education policy from the standpoint of unintentional influences of dominant ideology, rather than explicit oppression, is better suited to the framework of policy design theory.

A. Policy Design and Social Constructivism

Policy design theory is a “field of policy studies devoted to the systematic examination of the substantive content of policy” (Smith & Larimer 2009, p. 181). Policy design scholars “readily accept the notion that policy is purposive” – meaning, policies are designed to provide a solution to a problem – but argue that policies are not purely rational (Smith & Larimer 2009, p. 181). Rather, policy is inherently symbolic and value-laden (Smith & Larimer 2009). Policy design scholars “seek to understand how, and why, we get certain kinds of design elements instead of others, and just as importantly, seek to understand the full range of consequences that stem from differences in designs” (Schneider & Sidney 2009, p. 105). Policies are understood as both purposive and symbolic of “what, and who, society values” (Smith & Larimer 2009, p. 182).

In formulation, policy design scholars posit “the characteristics of design emerge from a political and social process” of interpretation and meaning-making in which “evidence tends to be used subjectively and selectively (Schneider & Sidney 2009, p. 105; Smith & Larimer 2009, p. 182). The subjective nature of policy formulation is foundational to policy design theory. Considerable debate exists among scholars regarding the appropriate role of values in policy studies, despite general agreement that policies are value-based (Smith & Larimer 2009). Policy design theory integrates empirical and normative analysis to guide scholars in thinking about both the technical features and the implicit ideas, values, and meanings of policies (Schneider & Sidney 2009). Scholars of policy design look for the “blueprint” of a policy from the viewpoint
that assembling policy content is a process of highly subjective interpretations (Smith & Larimer 2009).

A key strength of policy design theory is the inclusion of social constructivism and recognition of the centrality of meaning-making to the social order (Schneider & Sidney 2009). Schneider & Ingram (1997) treat policy design as dependent on social constructions. “Policy design elements, including tools, rules, rationales, and delivery structures, differ according to the social construction and power of target groups” (Ingram, Schneider & deLeon 2007, p. 104).

Choices in policy design are linked to embedded social constructions. Social constructions can be positive, encouraging target populations to participate and acquire policy benefits, or negative, causing withdrawal and the marginalization of burdened populations (Ingram, Schneider & deLeon 2007). The social constructions of target populations allow policymakers to “distribute benefits and burdens so as to reflect and perpetuate these constructions” (Ingram, Schneider & deLeon 2007, p. 93). When embedded into policy design, social constructions send messages that “convey who belongs, whose interests are important, what kind of “game” politics is, and whether one has a place at the table” to different target populations (Ingram, Schneider & deLeon 2007, p. 100).

Policy implies attitudes about target groups and the legitimacy of stated problems, but different populations receive different messages (Ingram & Schneider 2011). Akin to Stein’s (2004) deficiency-labeling in the culture of policy, Ingram, Schneider & deLeon (2007) explain the social construction framework views social problems as “interpretations of conditions that have been subjectively defined as problematic and, as such, demand some type of ameliorative action” (p. 97). The labeling of a social problem is a political act based on dominant values in a given policy domain (Ingram, Schneider & deLeon 2007). In focusing on how the world is
defined, the social construction framework uses stereotypes and assigns values to instruments, populations, and social problems as the elements of design that operationalize policy (Ingram, Schneider & deLeon 2007). Social constructions become naturalized and seldom questioned while policy designs become institutionalized as powerful reinforcers of these constructions and cultures, resulting in social and political consequences for the social status of different target populations (Ingram, Schneider & deLeon 2007).

The close linkage of rationales justified by social constructions of target groups in policy tools and solutions has implications for the effectiveness of policy in practice. “Social constructions are inherently resistant to change” (Ingram, Schneider & deLeon 2007, p. 108). The stronger the social construction, the easier policy designs that reinforce the stereotypes are accepted – and the more conceptions that go against the norm are ignored (Ingram, Schneider & deLeon 2007). Schneider & Sidney (2009) add an under-emphasized aspect of policy design theory is the social construction of knowledge in the policy process – not just images of target populations. Problem definitions, interpretations of cause and effect, characterizations of information as relevant or not, and the role of experts and what constitutes expertise are all elements of socially constructed knowledge in the policy process (Schneider & Sidney 2009).

However, improving policy design can spur change by providing “focus, resources, arenas, and prompt mobilization of political actors” as well as building strength among groups in service delivery (Ingram, Schneider & deLeon 2007, p. 109).

a. Elements of Policy Design Theory: A Framework for Analysis

Policy design theory focuses on particular policies in particular contexts and how they shape subsequent policies and actions (Ingram, Schneider & deLeon 2007). Policy design is both a dependent and an independent variable. As an independent variable, policy design
influences future political action – similar to Stein’s (2004) continuous feedback loop of language and rituals of practice with policy cultures (Schneider & Sidney 2009, p. 108). Policy design theory recognizes the language and rituals of practice produced from Stein’s (2004) policy culture, thereby providing a framework for investigating the “rural disconnect” or metro-centrism in state education policy design and its consequences in policy implementation.

Schneider & Ingram (1988) posit three premises exist in approaching policy design. At its core, “policy design is less a matter of intervention than of selection” (Schneider & Ingram 1988, p. 63). First, policy designs are often copied or borrowed from similar ones in other areas. Policymakers do not reinvent the wheel but rather draw from a familiar toolkit of policy instruments and mechanisms in the formulation process. Second, decision heuristics are central to the process of choosing features of policy design. Decision heuristics are “shortcuts or deviations from strictly rational decisions” (Schneider & Ingram 1988, p. 62). If decisions were purely rational, all possible options would need to be considered with complete knowledge of all factors at play – which is impossible to achieve. Decision heuristics allow policymakers to produce sufficient actions for attaining policy goals based on recognition of similarities between the problem at hand and other information stored in the policymaker’s memory (Schneider & Ingram 1988).

Third, combining an understanding of these heuristics with more critical examinations of the likelihood of common elements being chosen in policy design, provide a pathway for improving policy design. Decision heuristics highlight the unintentionality of the influences of dominant ideology in policy design critical policy analysis lacks. Individual policymakers rely on their memory to inform policy design. The reliance on decision heuristics introduces biases into policy formulation by limiting design potential to the options readily available in individual
policymakers’ memories. As a result, policy designs are mostly limited to what policymakers can readily borrow from a familiar toolkit of prominent policy features (Schneider & Ingram 1988).

Policy design theory has four main features: (1) Centrality of policy design, (2) attention to social constructions, (3) attention to policy consequences, and (4) integration of normative and empirical research and theory (Schneider & Sidney 2009, p. 103). Policy design refers to the content of policy – the specific elements that affect target groups, both as technical mechanisms and value-laden attributes that influence behavior (Ingram & Schneider 2011). Three basic elements of policy design are goals, targets, and agents. Goals may be explicitly stated in documents or inferred from analysis and are therefore not always clear or measurable. In some cases, goals may be hortatory (Schneider & Ingram 1988). Target populations are the winners and losers in the policy process, whereas agents are the officials responsible for implementing policy (Schneider & Ingram 1988). Combined, these three elements establish an overall structural logic to policy when linked together by policy tools, rules, and assumptions of efficacy (Schneider & Ingram 1988).

The linkage mechanisms among goals, targets, and agents are grounded in either technical, normative, or behavioral assumptions (Schneider & Ingram 1988). Policy design elements connect behavior with technical goals, value judgments, or policy tools. Tools of influence are explicit or implicit incentives embedded in the policy to encourage action, most commonly in the form of authority, incentives, capacity-building, symbolic and hortatory communications, and learning. Rules, in contrast, specify desired actions for targets and agents through timing – such as schedules and deadlines – and procedures. Examples include the designation of forms and access, establishment of reporting and analysis requirements, and other
mechanisms for oversight and monitoring. Analysis of these basic elements reveals the structural logic of policy design (Schneider & Ingram 1988).

Several scholars have expanded on Schneider & Ingram’s (1988) framework to further identify the core elements of policy for analysis. Schneider & Sidney (2009) identify nine empirical elements of public policy that capture the elements of policy design posed by other scholars in the greatest detail (see Ingram & Schneider (2011) and Ingram, Schneider & deLeon (2007) for similar, simplified frameworks). These nine elements are:

1. Problem definition and goals to be pursued by the policy.
2. Benefits and burdens to be distributed to target populations by the policy.
3. Target populations, or the “players” in the policy arena that may receive the benefits or burdens.
4. Rules or policy directives that state the explicit requirements of policies, including allocation of responsibility, accountability, timeframes, available resources, and eligibility.
5. Tools, or the incentives and disincentives to encourage compliance with policy.
6. Implementation structure and plan.
7. Social constructions used and developed for the policy as images of the perceived reality.
8. Rationales, both explicit and implicit, that justify and legitimize the policy.
9. Underlying assumptions, both explicit and implicit, about “causal logics” or the ability and existing capacity of people and organizations.

Schneider & Sidney (2009) argue policy design scholars must first identify these structural elements to then be able to evaluate overall design.
b. Policy Consequences and Local District Response

The interplay of policy design and policy implementation is important for evaluating the efficacy of policy design. Implementation literature often depicts policy implementation as disconnected from formation, but political environments affect both policy design and implementation (May 2003). Politics and ideology influence the tools and strategies incorporated into policy design (May 2003). Problems arise from failure to include elements in policy design that support effective implementation. Thus, implementation challenges can be “partially ameliorated with the crafting of appropriate policy designs” that effectively consider the commitment and capacity of target populations (May 2003, p. 223).

Altering policy design may improve policy implementation, but little clarity exists on how different policy designs hinder or facilitate implementation (May 2003). Malen (2003) argues, over time, state activism has become more direct and prescriptive. With the passage of the Every Student Succeeds Act (ESSA) in 2015, more latitude and flexibility has been returned to the states in education, thereby ushering in a greater need to examine education policy at the state-level (Hess & Eden 2017; Gagnon 2016; McGuinn 2016). Studies have found “profound differences” in how local school districts respond to state-initiated and mandated reform, suggesting significant differences may exist in state policy impact at the local level across geographic locales (Malen 2003).

Malen (2003) established a framework for comparing and contrasting low-impact and high-impact perspectives of state activism to investigate the influence of state-initiated reform on local school districts, providing a measure for examining the “full range of consequences” in state policy design at the local-level (Schneider & Sidney 2009). Low-impact state activism results in greater local autonomy, while high-impact sees greater local responsibility. In low-
impact state activism, street-level educators may insulate schools from the state-imposed policies, thereby preserving local autonomy. However, Malen (2003) argues the low-impact view places too much emphasis on local capacity to “duck and dodge” state mandates and may underestimate the power of the state to create pathways of influence (p. 202). For example, acts of decentralization may only be illusionary when matched with increases in standards and accountability or need for funding. High-impact state activism, in contrast, restricts local autonomy by making it “contingent on the will of the state” (Malen 2003, p. 203).

States may be having a deep impact on local school practice, but deeply embedded norms in local districts often make schools resistant to externally imposed change (Sipple, Killeen & Monk 2004). In New York State, local organizational responses may be receptive to both state pressures and local demand. Sipple, Killeen & Monk (2004) investigated New York State’s plan to increase high school graduation standards using Malen’s (2003) framework and found local districts varied in their responses to the new standards and expectations – despite the clear directives of the policy (Sipple, Killeen & Monk 2004). However, all districts emphasized the standards were the most important issue facing the district, whether they agreed with the policy directives or not.

Three issues shaped local response to state-imposed change in education policy in New York State: (1) local perceptions of the major issues facing their district, (2) educator philosophies of teaching – specifically, agreement with the belief that all children can learn, and (3) perceived pressure. In New York State, state activism in education policy hints toward a high-impact view (Sipple, Killeen & Monk 2004). Each of these issues were likely derived from the new and heightened expectations of the state, but local response depended heavily on community demands, competing issues, and differing levels of agreement and pressure.
However, Sipple, Killeen & Monk’s (2004) study was unable to reveal “what contextual features shape local responses” or how equitable state reforms are, given the differences in local capacity and ability to respond to the policy directives (p. 164).

Malen’s (2003) framework and Sipple, Killeen & Monk’s (2004) study provide mechanisms for analyzing the consequences of policy design in implementation, but neither investigate differences among urban, suburban, and rural districts within a state. Some scholars suggest examination of the differences across place in policy impact may be warranted. For example, Johnson & Howley (2015) argued School Improvement Grants (SIG) exemplify a rural disconnect in policy design. Upon further investigation in the state of Texas, Jochim (2018) found “the program had larger negative impacts on rural schools compared to their urban peers” (p. 42). Policy impact varied across place, though it is unclear if the disparate impact correlated with the potential metro-centric policy design. Sipple, Killeen & Monk (2004) excluded the only rural school district initially sampled in their study, leaving a gap in the analysis. As a result, available research lacks indications of the impact of state education policy on New York’s rural school districts and potential relationships with policy design.

B. Comparative Policy Analysis and Rural-Specific Design

Scholars argue appropriate rural school reform capitalizes on the linkages between education and schooling to place and community. That is, the distinctiveness of the rural place should be a central consideration in the design of education policy for rural schools and communities. Rural-specific policy may include indicators such as:

1. A focus on place.
2. Valuing outcomes that arise from individual situations, rather than predetermined results.
3. Invitations for the contribution of marginalized populations in policy development.
4. Long-term and multi-faceted plans.

5. Placing rural schools and communities in charge of reform (Kannapel & DeYoung 1999; see also Leo-Nyquist 2001).

However, some scholars argue rural-specific education policies do not exist in the United States (Schafft 2016). Instead, contemporary education policies directed toward rural schools are simply flexibility provisions designed to overcome the structural and resource disadvantages of rural schools and communities in meeting broader policies and standards (Eppley 2009; Johnson & Howley 2015; Schafft 2016).

Differing capacity challenges across rural school districts, specifically with regard to administration and professional development, tend to be overlooked in education policy design (Gilles 2017). For example, the implementation of state teacher evaluation programs may be influenced by place-based differences across the rural-urban spectrum (Gilles 2017). Flexibility afforded to local districts in policy design often requires a “considerable investment of resources” from rural school districts already limited in resources and with less administrative personnel to spare, while policy expectations may neglect the limited training opportunities and specialized expertise available in more remote communities (Gilles 2017, p. 18). Rural schools implement reforms in the “context of scarcity” where they often must “do more” with less human capital and fewer resources (Seal & Harmon 1995). However, “one-size-fits-all” policies and reforms tend to be designed by policymakers without recognition of the differences in geographical and organizational contexts that may, at the very least, complicate the implementation process (Gilles 2017; Johnson & Howley 2015).

Some scholars have investigated “rural specific” elements of policy design in state-level education policy. In a study of state-level equity plans submitted under the Excellent Educators
for All initiative, Gagnon & Mattingly (2015) found tremendous variation exists in designing rural policy nationwide, most states lack well-articulated rural policy solutions, and few states are using data to inform rural policy design. The Excellent Educators for All initiative attempts to address inequitable access to quality teachers by requiring states describe their plans for eliminating identified equity gaps. Measuring equity gaps across the rural-urban continuum was not a requirement of the federal policy, nor was addressing specific place-based gaps, but this initiative afforded states a great deal of flexibility in identifying and proposing solutions to eliminate equity gaps across their schools and districts (Gagnon & Mattingly 2015).

Among the state-equity plans submitted under this federal policy, 53% of states measured equity gaps across urbanicity, and 51% put forth “rural-specific” criteria in policy. However, little correlation was found between the act of examining rural gaps and the offering of rural-specific solutions – and less than one-third of states pursued both actions (Gagnon & Mattingly 2015). Some states implemented Grow Your Own initiatives in rural communities that emphasize forming partnerships and developing pipelines into the teacher workforce; others used financial incentives to encourage the closing of equity gaps, such as by expanding student loan forgiveness eligibility to teachers in rural areas. Rural communities of practice were formed in some cases to improve professional development and mentorship programs, and still in others the focus of state equity plans was on capacity building within rural school districts by sharing practices for overcoming human capital and other resource challenges (Gagnon & Mattingly 2015). These four strategies focus on place, community buy-in, and multi-faceted, long-term solutions to educational reform as the most commonly used contemporary policy solutions employed in rural areas across the United States (Gagnon & Mattingly 2015).
Policy design scholars posit that central features of policy design can be analyzed and compared to improve and support effective implementation. Policies “contain certain common elements, identifying who is supposed to do what, when, why, how, and for what purposes” (Schneider & Ingram 1988, p. 63). The relationship among these elements reveals the logic behind the policy’s design. Common design elements that “exist in virtually all policies” need to be identified and made explicit through comparative policy analysis (Schneider & Ingram 1988, p. 61). In doing so, policy design scholars can engage in cross-policy comparative analysis to systematically examine the structural logic across differing examples and increase the array of options available for policymakers in future formulation (Schneider & Ingram 1988).

The need for comparative, systematic analysis is rooted in the reliance on decision heuristics in policy formation (Schneider & Ingram 1988). “To a great extent, the biases introduced into designs through reliance on decision heuristics can be minimized by self-consciously recognizing that the heuristics exist, and by expanding on the number of examples on hand for comparison” (Schneider & Ingram 1988, p. 67). The combination of attention to elements of design and comparison across policy examples is especially important for meeting the needs and challenges across different political environments, as well as better understanding the linkages between design and implementation (May 2003; Schneider & Ingram 1988; Schneider & Sidney 2009).

Policy is an outcome of social conditions – a consequence of policy cultures – in which values and reliance on decision heuristics influence the choices of policymakers in design. Policies prescribe courses of action and resource allocation to target populations, while policy design “sends messages about what government is supposed to do, which citizens are deserving and undeserving, and what sort of participation is appropriate in democratic societies” (Ingram &
The efficacy of policy design depends on the range of ideas that occur to the decision-makers and the similarities in context between the ideas and the problems at hand – each of which “depend heavily upon the previous experiences of persons involved in the policy formulation process” (Schneider & Ingram 1988, p. 66; Smith & Larimer 2009). Therefore, the policy process is rooted in the use of language to justify and rationalize actions or outcomes through subjective and often value-laden interpretations (Smith & Larimer 2009).

Improving policy design requires research that makes “more explicit the biases introduced through reliance on decision heuristics” (Schneider & Ingram 1988, p. 61). Policymakers and analysts alike tend to “craft a reality that fits with their policy design rather than crafting a policy design that fits with reality” (Smith & Larimer 2009, p. 184-5). Policies are often justified as adhering to a given democratic value but, in reality, widespread disagreement exists over what constitutes those values (Stone 2002, as cited in Smith & Larimer 2009). Even seemingly agreeable goals face competing perspectives and divergent interests that can influence the effectiveness of policies in practice, positioning thoughtful, comparative analysis of policy design as a needed focus of policy scholars and studies (Smith & Larimer 2009).

IV. Conclusion

State education policies are negotiated and implemented by local actors, guided by their own worldviews and influenced by local resources, will and capacity (Lipsky 1977; Malen 2003; McLaughlin 1987). However, urban norms are often the standard, while differences in rural places are overlooked, neglected, or misunderstood (Jakubowski 2019; Thomas et al. 2011). Policies are value-laden and symbolic; rooted in dominant ideology, social constructions, and
cultural norms (Schneider & Ingram 1988). Policy initiatives “disconnected from particular norms” may “lead to incoherence, overextensions, and mixed messages that constrain efforts to promote reform” in schools and communities (Kahne, O’Brien, Brown & Quinn 2001, p. 451). While it may make sense for policymakers to “focus on the big picture”, such an approach may prove counterproductive as local actors are challenged to reconcile broader ideals with local realities which may drive “schools to drop out or resist rather than change” (Kahne, O’Brien, Brown & Quinn 2001, p. 449). The potential for resistance may exist across all districts, but if policy initiatives are grounded in metro-centric philosophies, rural schools and places face the greater disadvantage (Fernandes & Neves 2010).

In 1983, Sher argued “neither the specialization typical of big urban schools nor the coziness of small rural schools makes an impact on pupil performance comparable to more profound influences in students’ lives” (p. 260). Place, with all of its social and cultural dynamics, influences the success of education policies in rural school districts (Gruenewald 2003b; Kahne, O’Brien, Brown & Quinn 2001). The literature reviewed in the preceding sections discusses ways in which scholars may argue place is relevant to education, schooling, and policymaking. Places are cultural arenas wherein spatial differences influence individual worldviews, choices, and actions, as well as educational attainment, opportunities, inequality, and capacity. Policies, too, are cultural products, influenced by the dominant ideologies of society. Dating back to the turn of the 20th century, urban-favored policy designs have been influencing education policy and reform with very real effects on schooling in rural places, but limited attention has been paid to the relationship between policy design and policy implementation across geographic locales.
The next chapter presents the research design used in this study to investigate the relationship between New York State education policy design and policy implementation in order to better understand the extent to which major state education policies are meeting the needs and interests of rural school districts.
Chapter 3: Research Methods

I. Research Rationale

In December 2014, the Rural Opportunities Consortium of Idaho investigated federal education policy in rural America and found many programs, particularly federal formula and competitive grant programs and federally activated state programs, disproportionately disadvantaged rural school districts. The Consortium found that a lack of consideration of the different administrative capacities of small districts compared to larger ones, minimal financial resources, and “number-of-students-served” requirements were central to the disparate impact federal education policies were having on rural districts (Johnson, Mitchel & Rotherham 2014; see also United States Department of Education Section 5005 Report on Rural Education (2018) for a discussion on federal grant disparities). Among the school superintendents, education stakeholders, and national education policy “insiders” interviewed in this report, a majority of educators believed rural education is “not important” to leaders in the United States Department of Education (USDOE). In fact, 92% of superintendents and 83% of policy insiders agreed “while rural America is markedly different from other parts of the country, policy decisions don’t reflect that reality” (Johnson, Mitchel & Rotherham 2014, p. 16). Instead, “most education policies” are not being designed with rural schools in mind and policymakers are not making efforts to understand the unique challenges of the rural place (Johnson, Mitchel & Rotherham 2014).

Gaps exist in the literature on the differing impacts of state education policies across geographic locales and the relationship between policy design and misconceptions of rural places. Some scholars have found that several contemporary federal and state education policies demonstrate misunderstandings of rural education capacity, but there has been little explicit
attention to metro-centric or urban-favored elements of state policy design in education research (Eppley 2009; Gagnon 2015; Gagnon & Mattingly 2015; Gilles 2017; Johnson & Howley 2015; Johnson, Mitchell & Rotherham 2014). This study begins to address gaps in the literature regarding the relationship of geographic place and education policy by focusing attention on similarities and differences in the design of general state education policies and their alignment with the needs and interests of rural school districts. For the purposes of this study, general state education policies are those that all public school districts are required to implement.

The significance of this study is in applying the concept of metro-centrism or urban-favored ideology to analyzing education policy design and opening the potential for state education agencies to improve practice through greater consideration of place and place-based ideology in policy design for public school districts. The neglect of place-based considerations in state education policymaking may be having unintended influences over rural school districts, particularly in geographically diverse states such as New York. New York may have a strong urbanormative approach to state education policy and scholars have found that at least one of New York’s contemporary state-initiated education reforms hints toward high-impact state activism in metropolitan school districts, leaving questions surrounding the influences of metro-centrism and state policy designs on the state’s rural school districts (Jakubowski 2019; Sipple, Killeen & Monk 2004). The purpose of this study was to begin to investigate the relationship between state education policy design and implementation across rural school districts in New York State (NYS).

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8 New York State houses public school districts classified under each of the National Center for Education Statistics’ (NCES) twelve locale designations—ranging from Large City to Remote Rural—including the largest metropolis in the United States (New York City). In 2013-14, only 17 other states had at least one public school district classified under each of the twelve NCES locale designations (“Locale Education Agency Universe Survey” 2013-14).
A. Research Questions

My research questions are drawn from literature on rural education and schooling, the culture of education policy (Stein 2004), Malen’s (2003) framework for state activism, and comparative policy design theory:

1. What are key similarities and differences in the design of a purposive sample of four recent New York State education policies?
2. What are key similarities and differences in the will and capacity of a random sample of three rural school districts in New York State to implement these education policies?
3. What are key similarities and differences in the perceptions of New York State education officials and rural school district leaders regarding the alignment of these policies with the needs, interests, and capacity of rural school districts?

In answering these research questions, issues to be addressed include stated aims of the policies and the problems they are designed to address; financial resources and human capital required of rural school districts; state flexibility and local autonomy; ease and challenges of policy implementation for rural school districts; levels of state assistance and oversight during policy implementation; and overall alignment of the policies with the needs and interests of rural school districts.

II. Research Design

My research design was a qualitative, collective case study. A case study is an empirical inquiry “to understand a real-life phenomenon in depth” where the contextual conditions are “highly pertinent to your phenomenon of study” (Yin 2009, p. 18). An understanding of context is critical to studying real-life phenomena, which was the focal point of my dissertation. A collective case study, also known as a Multiple Instrumental Case Study, describes and compares
multiple cases to provide insight into an issue (Creswell 2012). Case studies are well-suited to “how” and “why” research questions about contemporary events beyond the control of the researcher (Yin 2009). A collective case study provides a basis for comparing events across different contexts and situations, while also supporting an exploratory investigation that takes each “case” holistically, on its own terms.

**Why a Qualitative, Collective Case Study?** Qualitative research was best-suited to my study because my focus is on the human element of policy design and implementation, in terms of how decisions are made, negotiated, and responded to by state officials and local actors. Identifying indicators of ideology, comparing and contrasting implementation plans, challenges, and successes, and studying human behavior within different contexts require a research design that facilitates description and interpretation. Qualitative research strives to reach a deeper understanding of an issue, which differs from the objectives of identifying trends and providing explanations in quantitative research (Creswell 2012). Thus, a qualitative study provided a pathway for exploring how people create and respond to elements of policy design in education and schooling.

Importantly, qualitative research supports investigation of a research problem in which the variables important to explore are unknown (Creswell 2012). Indicators of place-based ideology or metro-centrism in policy design and their potential influences on policy implementation in school districts are largely unknown. A purpose of my study was to begin to identify what these variables may be for future research by considering the similarities and differences across several key factors, such as will and capacity to implement policies. Data was collected from participants involved in the phenomenon, then analyzed to identify meaning in descriptions of the places studied. The goal was to obtain detailed information about particular
places and interpret the findings to reveal themes and meaning within the phenomenon, which
was best-suited to qualitative inquiry (Creswell 2012).

One feature of a case study is the attempt “to illuminate a decision or set of decisions:
why they were taken, how they were implemented, and with what result” (Schramm 1971, as
cited in Yin 2009, p. 17). The process and effects of decision-making can be clarified and
described in a case study design, which meshes well with the framework of comparative policy
design theory that guided my research and analysis. Policy design theory includes attention to
the choices policymakers make in the process of formulation, as well as the consequences of
those decisions in subsequent policy implementation (Schneider & Ingram 1988). Using a case
study design best supported investigation of the decision-making involved in policy design and
implementation.

Yin (2009) explains “the case study’s unique strength is its ability to deal with a full
variety of evidence” (p. 11). Case studies cope with situations that have many variables of
interest, thereby requiring multiple sources of evidence (Yin 2009). For my study, a
combination of document analysis and interviews was necessary for collecting appropriate data
to answer my research questions. First, policy documents were reviewed to answer my first
research question that focuses on policy design to investigate problem definitions, proposed
solutions, and underlying assumptions in the content of state education policies. Second, school
district officials – the “agents” responsible for overseeing the local implementation of state
policies – were interviewed. Third, NYS education officials were interviewed. These three sets
of information provided a convergence of evidence that reveal the extent to which state
education policies are (a) designed to address the needs and interests of rural school districts in
NYS, and (b) actually do so during policy implementation.
A. Cases and Sampling Methods

My target population was rural, public Pre-Kindergarten through twelfth grade (P-12) school districts in NYS. I selected four general state education policies enacted in State Fiscal Years (SFY) 2018-2020. My study included three (3) public school districts and four (4) state education policies.

Policies: Four major state education policies enacted in the most recent State Fiscal Years (SFY 2018-2020) were selected. Sampling from the most recent fiscal years minimized the risk that state officials and school leaders involved in the design and implementation of these policies have since retired or left the agency or district. Purposeful sampling was best suited for my study because it identifies samples based on specific characteristics of interest (Creswell 2012; Yin 2009). My sample only included policies enacted in SFY 2018-2020 that all public school districts in NYS implemented or are in the process of implementing, as of the 2020-2021 academic year. None of the policies sampled target specific student populations, such as English Language Learners (ELL) or Homeless Youth, whose representation in the student body varies significantly across districts. Controlling for student demographics within the school districts sampled was outside the scope and purposes of this study. Likewise, it was not within the scope of this study to control for specific hiring and retention needs of the school districts sampled, therefore policies targeting teacher certification requirements for specific disciplines, such as Special Education or Career and Technical Education (CTE), were not included in the sample.

All policies selected are considered major education policies, as evidenced by one or more of the following: (a) significant funding attached to the policy, (b) the policy addresses a prominent issue that garners public attention, and/or (c) the scope of impact includes notable changes to school operations and/or daily functioning. None of the policies are classified as
emergency or temporary policies by the New York State Education Department (NYSED).

Excluding emergency and temporary policies minimized the chance that little time was spent on the design, formulation, and implementation of the policies. Table 3.1 summarizes my criteria for the purposeful sampling of four state education policies.

Table 3.1: Policy Purposeful Sampling

<table>
<thead>
<tr>
<th>Policy Characteristics</th>
<th>Sample Requirements</th>
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<tbody>
<tr>
<td>General State Education Policy Enacted in SFY 2018-2020</td>
<td>As of the 2020-2021 academic year, all public school districts in the state of New York implemented or are in the process of implementing all 4 policies.</td>
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<tr>
<td></td>
<td>None of the policies target specific student populations, such as English Language Learners (ELL), whose representation varies significantly among districts.</td>
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<tr>
<td></td>
<td>None of the policies target teacher certification requirements for specific disciplines, such as Special Education, whose hiring and retention needs vary among districts.</td>
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<tr>
<td></td>
<td>All 4 policies were enacted in SFY 2018-2020</td>
</tr>
<tr>
<td>Major State Education Policy</td>
<td>Evidenced by one or more of the following:</td>
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<tr>
<td></td>
<td>a. Significant funding attached</td>
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<td></td>
<td>b. Addressing a prominent issue that garners public attention</td>
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<tr>
<td></td>
<td>c. Scope of impact includes notable changes to school operations and/or daily functioning</td>
</tr>
<tr>
<td>Time Commitments</td>
<td>No emergency or temporary policies included in sample</td>
</tr>
</tbody>
</table>

Education Policy in the State of New York, SFY 2018-2020

In NYS, the Board of Regents (BOR) is the education policymaking authority for the state and responsible for overseeing all educational activities statewide. The 17 members meet
monthly “to set education policy for the state” based on the recommendations of the various committees and subcommittees they serve on (NYSED, BOR n.d.).\(^9\) SFY 2018 began on April 01, 2017 and SFY 2020 ended on March 31, 2020. During this time, NYSED reports 205 regulations adopted by the BOR (“Rules and Regulations” n.d.).\(^{10}\) A slight majority of the regulations were emergency regulations (55%) that were excluded based on my sampling criteria. Policies targeting higher education, licensing of the professions, charter schools, and non-public schools, as well as policies related to specific populations of students and teacher certification for specific disciplines, were also excluded based on my sampling criteria. These parameters reduced the possible policies from SFY 2018-2020 by more than 50 percent.

Importantly, SFY 2020 ended after the onset of the COVID-19 pandemic, which resulted in the transition of all public schools to remote learning in late March 2020 under the executive order of “NYS on PAUSE.” This period saw the rapid creation and implementation of many education policies in response to this unprecedented time (“Coronavirus (COVID-19)” n.d.). None of the policies in my study are from the NYS on PAUSE era because many policies enacted in response to COVID-19 were emergency regulations, adopted quickly without a public comment period. Most of these policies were also temporary (“Coronavirus (COVID-19)” n.d.).

Further, as described below, policies unrelated to the COVID-19 pandemic but whose implementation was delayed because of it were excluded from my sample.\(^{11}\)

\(^9\) BOR does not meet during August recess period.

\(^{10}\) Some overlap exists among these 205 regulations. Many emergency policies approved by the BOR act as placeholders until a permanent policy can be adopted, leaving the possibility that a regular policy may have once been classified as an emergency policy. Since SFY 2018, the BOR has increased their frequency in adopting emergency regulations. In the most recent SFY (2020) 64% of adopted regulations were classified as emergency—a 17 percentage point increase since SFY 2018 (see BOR Meeting Archives, NYSED, for rationales and examples of emergency adoption).

\(^{11}\) This includes most policies adopted in the final quarter of SFY 2020 (January through March), or whose initial implementation was planned for early SFY 2021.
The climate of education policymaking in NYS since the beginning of SFY 2018 is largely rooted in the implementation of New York’s consolidated state plan under the federal Every Student Succeeds Act (ESSA), which provides significant federal funding to the states for schooling and education. The Elementary and Secondary Education Act of 1965 (ESEA) as amended by ESSA was signed into law in December 2015. To increase the transparency of ESSA’s implementation, Section (§) 8302 required each state to develop and submit a consolidated plan to the United States Department of Education (USDOE) no later than September 2017, outlining how the state will meet all ESEA requirements (USDOE n.d.). NYS’s ESSA Plan was approved by the USDOE in January 2018 with key commitments that include improving transparency, accountability, equity, and student outcomes (NYSED 2018-January). Many policies adopted since then are in pursuit of these key commitments. Below I discuss the four general state education policies examined in my study.

**Policy #1 – Meal Shaming:** Learning standards and benchmarks, as well as graduation measures, have been major policy items in NYS since SFY 2018, including the adoption of the Next Generation Learning Standards in English Language Arts and Mathematics in September 2017, requirements to embed Mental Health Education in curriculum by July 2018, and review of state graduation measures launched in November 2019 (“Policy and Guidance” n.d.). Full implementation of the Next Generation Learning Standards was initially planned for the 2020-2021 academic year but delayed to 2022 due to the COVID-19 pandemic, while Phase I of the review of graduation measures was likewise postponed (“Coronavirus (COVID-19)” n.d.). However, COVID-19 has not impacted NYS’s pursuit of Social Emotional Learning (SEL) Standards, which was made a Department priority under former-Commissioner MaryEllen Elia
and intertwined with plans for improving equity and student outcomes under the state’s ESSA plan (Ebert 2018).

New York’s pursuit of SEL dates back to Social and Emotional Development and Learning (SEDL) guidelines adopted by the BOR in July 2011 and was reinvigorated as an agenda item in late 2017, following the recommendations of the Safe Schools Task Force and its School Climate and Student Engagement Workgroup. The implementation of SEL guidelines provided by the state is voluntary for school districts, which falls outside of my sampling criteria (NYSED, Office of Student Support Services n.d.). However, related to these pursuits for improving school climate is Regulations of the Commissioner of Education §114.5 prohibiting “Meal Shaming” in schools. NYSED created and shared a template plan for school districts to facilitate the development of their own Meal Shaming policies. Districts were required to address how their schools will prohibit meal shaming and how unpaid meal fees will be communicated to parents or legal guardians in order to prevent public humiliation (NYSED, Child Nutrition Knowledge Center n.d.; NYSED, Office of Counsel 2019-January 15; Tyner-Doyle 2018). All public school districts that provide breakfast or lunch to students were required to develop plans to protect students with unpaid school meal fees from being treated differently by July 01, 2018 (Tyner-Doyle 2018).

Policy #2 – Professional Development Plans: A central feature of NYS’s ESSA Plan is improving educator effectiveness and building on the aims of equitable access to high quality teachers and leaders for students statewide. These goals are put forth in NYS’s Equity Plan (NYSED 2018-January; NYSED, Educator Quality and Professional Development n.d.). In pursuit of these aims, the BOR’s P-12 and Higher Education Committees reviewed and adopted agenda items related to teacher and leader certification, mentoring and formal induction
requirements, increased student teaching requirements and clinical experiences, and professional learning standards for school- and university-based educators in recent years (D’Agati 2019-April). For example, in March 2018, the BOR adopted amendments to §80-3.4 for teacher mentoring requirements, which requires 180 days of mentoring for most new hires (NYSED, Office of Counsel 2018-March 12). It was beyond the scope of this study to control for teacher vacancies and hiring needs of the school districts sampled. However, new mentoring requirements were also embedded in an amendment to the NYS policy on professional development planning for P-12 teachers and leaders.

In December 2019, the BOR adopted amendments to §100.2(dd) regarding P-12 professional development plans that included a critical shift in language from professional “development” to “learning” plans and expanded requirements to include planning for the professional learning of school leaders. The purpose of these plans is to ensure that teachers and leaders have opportunities for professional development and remain current in best practices for meeting student learning needs (D’Agati 2019-January). The policy requires the plans to be developed with explicit attention to cultural responsiveness and alignment with local community needs, as well as consideration of implementing first-year mentoring programs and comprehensive induction models for new hires in support of the amendment to mentoring requirements adopted in March 2018. This amendment requires school districts complete a needs analysis using both quantitative and qualitative information on teacher and leader practice and student outcomes in order to tailor professional learning plans to the local district needs. P-12 school districts must submit an annual professional learning plan that fulfills these requirements by September 1st each year (D’Agati 2019-January; NYSED, Office of Counsel 2019-December 10).
Policy #3 – Student Data Privacy: Annual Professional Performance Reviews (APPR) of classroom teachers and building principals compose a leading topic in NYS, after being signed into law as part of the 2019-2020 Enacted State Budget. However, in February 2020 the proposed amendment for the APPR statutory changes were adopted for a fourth time as an emergency measure by the BOR, following a 60-day public comment period (“NYS Evaluation System” n.d.). Despite being a major NYS education policy, APPR remains an emergency measure and school districts are still working under previously approved APPR plans. Thus, this regulation did not meet my sampling criteria. The protection of APPR data, however, is linked to another recent major policy. A new Student Data Privacy regulation (Part 121) took effect in January 2020. Part 121 is aimed at strengthening protection of student data and APPR data in education agencies with a focus on personally identifiable information (“Part 121 of the Regulations of the Commissioner of Education” n.d.).

Under Part 121, NYS school districts must strengthen data protection measures and training requirements for accessing student and/or educator data as well as contracting with third-parties. Additionally, districts must identify data protection officers and implement the National Institute of Standards and Technology (NIST) Cybersecurity Framework (NYSED, Office of Counsel 2020-January 13). Unlike many other policies that were overshadowed by the onset of the COVID-19 pandemic, school closures and the transition to online learning brought attention to student data security. All educational agencies were required to adopt and publicize a data security and privacy policy by July 01, 2020 (“Part 121 of the Regulations of the Commissioner of Education” n.d.).

Policy #4 – School Safety Plans: New York has also enacted changes to school safety planning in recent years. In October 2019, the BOR adopted amendments to §155.17 of the
Regulations of the Commissioner of Education related to school safety plans.\textsuperscript{12} These regulations aimed to better prepare school staff to respond to violent incidents on school grounds.\textsuperscript{13} New York’s focus on amending school safety plans came in response to concerns raised about State oversight of emergency planning in school districts and the presence of law enforcement personnel in school buildings (Association of School Business Officials 2019). The BOR amendments require every school to define the roles of school and security personnel and law enforcement in responding to student violations of the code of conduct.

Schools must also adopt a written contract of memorandum of understanding (MOU) developed with stakeholder input outlining these responsibilities. Stakeholders under this regulation are broadly defined to include school administrators and teachers, parents, students, community members, officials in the criminal justice and legal system, and collective bargaining units (NYSED, Office of Counsel 2019-October 08). This explicit attention to community inclusion in policy implementation is particularly interesting for studying rural school districts, given the stronger community ties and involvement often reported in rural communities (Anderson & Lonsdale 2014). All public school districts were required to implement this policy beginning in the 2019-2020 academic year (D’Agati 2019-July).

As previously noted, several major NYS policies are in the early stages of implementation processes impacted by the COVID-19 pandemic. However, the policies described above on Meal Shaming, Professional Development Plans, Student Data Privacy, and School Safety Plans each met the components of my sampling criteria suitable for the purposes

\textsuperscript{12} This was in response to changes to Education Law §2801-a included in the 2019-2020 Enacted State Budget, which required school districts adopt a written contract or memorandum of understanding (MOU) defining the relationship between districts, their visitors, and law enforcement or other safety personnel (D’Agati 2019-July).

\textsuperscript{13} NYSED’s amendment to §155.17 implements the changes included in Chapter 59 of the Laws of 2019 and was first enacted as an emergency policy effective July 01, 2019, prior to the 60-day comment period. However, NYSED received no public comments prior to permanent adoption of the amendment in October 2019 (D’Agati 2019-July).
of my study. BOR agenda items and NYSED press releases, among other media coverage, suggest that each of these policies have been part of major initiatives across the NYS education landscape since SFY 2018. These four policies represent a variety of major policy areas and apply to all P-12 public school districts in NYS, thereby meeting my definition of general state education policies.

Selection of Rural School Districts: Three (3) P-12 school districts classified as rural by both the National Center for Education Statistics (NCES) and the NYSED locale designation categories were included in my study. Cross-tabulating locale designation systems has been shown to improve the precision of definitions of place (Elder 1992). NYSED reports data on 732 public school districts, however my study sampled from a total of 721 districts. Several districts have closed or merged in New York since 2012, which have not been fully reconciled in the state’s data reporting system. Also not included in the sample was the one district that no longer teaches, but instead sends its students to other districts, as well as the one district that does not enroll any students (NYSED, Office of Information and Reporting Services 2019).

NYSED publishes raw data from schools districts in its Institutional Master Files (IMF) and Personnel Master Files (PMF). Within these files school district data is reported by several descriptors, including a series of place-based categories that organizes the state’s school districts by city, suburb, or rural place. Other classifications NYSED uses focus on size – small, medium, or large – or the need-to-resource capacity (N/RC), under which place is not a primary focus and rural districts may fall in the same categories as suburban or urban (NYSED, Office of Information and Reporting Services 2019). Table 3.2 shows the number of public school districts listed by NYSED’s place-based locale categories.
### Table 3.2: New York State Public School Districts by NYSED Locale Designation

<table>
<thead>
<tr>
<th>NYSED Locale Designation</th>
<th>Number of Public School Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>New York City</td>
<td>33</td>
</tr>
<tr>
<td>Big 4 Cities</td>
<td>4</td>
</tr>
<tr>
<td>Downstate Small Cities</td>
<td>7</td>
</tr>
<tr>
<td>Upstate Small Cities</td>
<td>50</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>94</strong></td>
</tr>
<tr>
<td>Downstate Suburb</td>
<td>177</td>
</tr>
<tr>
<td>Upstate Suburb</td>
<td>262</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>439</strong></td>
</tr>
<tr>
<td>Rural</td>
<td>188</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>188</strong></td>
</tr>
</tbody>
</table>


NCES organizes school districts into locale designations based on four main categories – city, suburban, town, and rural – that can be detailed into a total of twelve categories, differentiated by either population size or proximity to an urbanized area (Geverdt 2017). City and suburban places are each located inside an urbanized area, where the population exceeds 50,000, while town and rural places are outside urbanized areas at increasing distances. Suburban places are not located within a principal city, which distinguishes them from city designations. Likewise, rural places are not located within urban clusters – where the population ranges from 2,500 to 50,000 – which distinguishes them from towns in the NCES system (Geverdt 2017). Table 3.3 shows the number of public school districts in NYS listed by NCES locale designation.
Table 3.3: New York State Public School Districts by NCES Locale Designation

<table>
<thead>
<tr>
<th>NCES Designation</th>
<th>Number of Public School Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Large</td>
<td>34</td>
</tr>
<tr>
<td>City: Midsize</td>
<td>2</td>
</tr>
<tr>
<td>City: Small</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>53</strong></td>
</tr>
<tr>
<td>Suburb: Large</td>
<td>238</td>
</tr>
<tr>
<td>Suburb: Midsize</td>
<td>11</td>
</tr>
<tr>
<td>Suburb: Small</td>
<td>14</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>263</strong></td>
</tr>
<tr>
<td>Town: Fringe</td>
<td>34</td>
</tr>
<tr>
<td>Town: Distant</td>
<td>56</td>
</tr>
<tr>
<td>Town: Remote</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>102</strong></td>
</tr>
<tr>
<td>Rural: Fringe</td>
<td>95</td>
</tr>
<tr>
<td>Rural: Distant</td>
<td>179</td>
</tr>
<tr>
<td>Rural: Remote</td>
<td>29</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>303</strong></td>
</tr>
</tbody>
</table>


Cross-tabulating these locale designation systems results in a total sample of 154 districts that both NCES and NYSED classify as rural, shown in Table 3.4. The final sample of rural school districts represents 21% of New York’s 732 public school districts.
Table 3.4: New York State Public School Districts by Place

<table>
<thead>
<tr>
<th>NCES Designations</th>
<th>NYSED Designations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>City</td>
</tr>
<tr>
<td>City</td>
<td>47</td>
</tr>
<tr>
<td>Suburb</td>
<td>20</td>
</tr>
<tr>
<td>Rural</td>
<td>3</td>
</tr>
<tr>
<td>Town</td>
<td>24</td>
</tr>
</tbody>
</table>


Stratified random sampling was used to select the rural school districts for my study (Creswell 2012). The 154 rural school districts in NYS were stratified into three categories based on remoteness of place, as defined by the NCES classification system shown in Table 3.5.14

Table 3.5: Stratified Sample

<table>
<thead>
<tr>
<th>Stratified Sample</th>
<th>Number of Public School Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural Locale Designation</td>
<td></td>
</tr>
<tr>
<td>Rural: Fringe</td>
<td>21</td>
</tr>
<tr>
<td>Rural: Distant</td>
<td>107</td>
</tr>
<tr>
<td>Rural: Remote</td>
<td>26</td>
</tr>
<tr>
<td>Total:</td>
<td>154</td>
</tr>
</tbody>
</table>


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14 See Appendix A: Stratified Sample of Rural School Districts Mapped
This stratification allowed for the greatest degree of variation among the rural school districts based on remoteness of place and distance from the services and opportunities of metropolitan areas. One remote rural school district, one distant rural school district, and one fringe rural school district were selected for a total of three rural school districts.

B. Data Collection and Procedures

An important feature of case study research is the lack of full control the researcher has over the data collection environment, which requires clear protocols and schedules for data collection but also flexibility and openness for unexpected changes (Yin 2009). Two forms of data were collected for my study: Policy documents and interviews with school leadership and state education officials. Collecting multiple forms of data allows for the convergence of evidence, which supports the validity of the research and reveals where data differs or coincides (Shandana & Mujtaba 2016). Yin (2009) refers to this convergence as triangulation, in which multiple data sources are brought together to confirm that the information and the interpretation of findings is valid, consistent, and accurate. Triangulation supports the validity of both the findings and the process of data collection and analysis by ensuring that the data is in fact telling the story the researcher thinks is being told (Yin 2009).

*Policy Documents:* First, I collected state policy documents for the four education policies sampled, publicly available online through NYSED. Document data was analyzed using the framework of comparative policy design theory, which focuses on the content of final policies. The policy adoption process documents that record the process of formulating policies were not the focus. My interest was not in the choices that were *considered*, but rather the

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15 NYSED maintains a webpage on policy and guidance that allows educators and the general public to search for recently adopted rules and regulations. In addition to the resources NYSED shares, monthly BOR meetings are published and maintained in an archive of meeting minutes and related documents.
decisions that were ultimately made for inclusion or exclusion in the policy. Thus, only the final, written policy and supplementary materials, such as templates and guidance documents, were examined. Additionally, documents regarding the implementation of the four state education policies were collected from the school districts, as available. These documents – such as memorandums, proposals, school board meeting minutes, and other correspondence – were important for gaining insight into the process of interpretation and implementation of these policies at the district-level. District-level documents were collected from the school districts’ webpages, where most memorandums, guidance, and Board of Education (BOE) meeting minutes are available.

Interviews: A minimum of 16 interviews were planned for my study with both district-level and state education officials. Ultimately, 22 interviews were conducted between early December 2020 and late February 2021. In each school district studied, interviews were conducted with the primary agents responsible for leading and overseeing policy implementation in their respective districts. Administrative staff differs across schools districts, with rural districts having a greater likelihood of employing only a superintendent and single building principal and not staffing any assistants or associates to these positions. For each district, each interviewee was asked if there were any additional school officials that were involved in the implementation of any of the four policies.

At least four school leaders from each of the sampled school districts were interviewed. School Board Presidents, superintendents, principals, and school business officials were the four primary school leaders interviewed. Assistant superintendents and/or principals were included if available. Additionally, at least one NYSED official was interviewed regarding each of the four policies sampled. The state education officials were selected based on their involvement with
and/or knowledge of the design of the study’s policies. Two members of the Board of Regents were also interviewed. The focus of these interviews was on interviewee perceptions of the design and implementation of the four state education policies.

In my initial request for participation in my study, the human subjects were provided with information on the purpose of my study, estimated time commitment I was requesting, method of interview, how their data would be used, and the policies sampled, as well as assurance of the confidentiality and minimal risk associated with their participation. The interviewees were informed in advance of the policies that were the focus of the interviews. Interviews with school leadership and state education officials were conducted remotely, using Zoom or by phone as convenient for each interviewee.16 Interviews averaged 60 minutes in duration and were scheduled at the convenience of the human subjects to the greatest extent possible. All interviews were completed in one session.

The interviews were semi-structured, guided by a list of questions aligned with my research questions.17 The questions were informed by comparative design theory and Malen’s (2003) high-impact versus low-impact state activism and also studied key constructs such as local autonomy, state pressure, resistance, and place. Open-ended questions were best suited for my study because they are more exploratory in nature and mitigate the influence of the researcher’s own experiences on the responses by allowing the participants to respond in alignment with their unique social and cultural experiences (Neuman 2000, as cited in Creswell 2012). As indicated in Appendix B: Sample Interview Questions, I asked about matters such as interviewee interpretation and understanding of the issues and aims of each policy,

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16 Due to the restrictions of the COVID-19 pandemic, no interviews will be conducted in-person or on-site.
17 See Appendix B: Sample Interview Questions
considerations in the formulation, considerations in the planning process for implementation, successes and challenges in the implementation, and interviewee perception of the alignment of each policy with the needs and interests of rural school districts. Interviews with state education officials provided data on state-level perceptions of the alignment of state education policy designs with the needs and interests of rural school districts and allowed for comparisons of their perceptions with those of the rural school leaders interviewed.

III. Data Analysis

Comparative policy design theory and components of Malen’s (2003) high-impact versus low-impact state activism guided data analysis in my study. I was solely responsible for transcribing interviews and coding data to identify themes. Data analysis was accomplished in a series of steps: First, to organize policy content into similarities and differences in elements of policy design. Second, to organize interview data by similarities and differences in challenges, ease of implementation, and district needs. Once organized, these similarities and differences were further coded based on the existence of local autonomy, local responsibility, or a middle-ground, if appropriate, in the process of policy implementation. Finally, state education official interview data was compared to the school leadership interview data to organize similarities and differences in the perceptions of the implementation of these policies in rural school districts in relation to the elements of policy design.

Coding is the process of breaking down the data collected into labeled segments, after which the data was aggregated into major themes and complemented by description of the information (Creswell 2012). The organization and coding of these data sets were the result of multiple readings of the policy documents and interview transcripts collected. The organized data sets were then analyzed across the four policies to identify emerging themes across place
and their relationship with the key constructs of metro-centrism and decision heuristics in policy design. This convergence of different lines of inquiry, or triangulation of data sources, increases the validity of the findings (Creswell 2012; Yin 2009).

Emerging themes were considered based on similarities and differences across policies and districts. Specifically, the convergence of my findings and analysis was considered in regard to the key construct of metro-centrism. Metro-centrism is defined in this study as a preference for urbanicity in education policy and practice, by which metropolitan life is regarded as more satisfying and efficient living while rural places are described as declining, deficient, and in need of remediation. Through a metro-centric lens, policy design focuses on metropolitan experiences and overlook, misunderstand, or mischaracterize rural realities, thereby producing additional barriers for rural school districts (Colwell 1970; Johnson & Howley 2015; Robson, Burgoyne-Allen, Squire & Schultz 2019). My focus was on the extent and ways in which NYS education policies are addressing the specific needs and interests of rural school districts.

Ethical Considerations

Each human subject was assured their participation was voluntary and they were not required to answer all questions posed in the interviews. Steps were taken to minimize risks and ensure the privacy and confidentiality of the school districts and human subjects sampled for my study, including referring to the school districts and human subjects only by place in all notes, findings, and analysis completed, and corresponding with the human subjects through an email address that was secured by multi-factor authentication (MFA). Participants are not named in my study. To minimize any potential risk of exposure, all data collected from the districts and human subjects was de-identified so that the districts and human subjects were only referenced by locale or policy, and all email correspondence was destroyed at the conclusion of the study.
The principles of respect, responsibility, and reciprocity are the basis of ethical considerations in research (Anderson & Lonsdale 2014). Researchers should have a critical self-awareness of their own biases, worldviews, and understandings when collecting and analyzing data so as to ensure the reliability, validity, and objectivity of their findings, as well as fairness to the subjects of study (Anderson & Lonsdale 2014). The principle of responsibility is important for ensuring the research process is transparent and the conclusions drawn are fair. Rural schooling tends to be less well-understood than schooling in other places, but commonly has close connections with the local communities. Rural education researchers therefore have the responsibility of remembering the local culture and values in analysis and reporting of findings to ensure fairness in conclusions and respect for subjects (Anderson & Lonsdale 2014).

Positionality Statement: Scholars “come to research rural education in a variety of ways” with their “personal journey” influencing how they approach, design, conceptualize, and ascribe importance to the research (Bartholomaeus, Halsey & Corbett 2014, p. 58). Some scholars argue that to do justice to rural research, the researcher must have direct, deep, and extensive experience with “rural.” Otherwise, they may fall victim to perpetuating stereotypes, viewing rural places and schools as deficient, or offering “improbable” recommendations (White & Corbett 2014). A critical self-awareness in research for rural education includes recognition of a rural standpoint or “position that rural people and communities really matter” (Roberts 2014, p. 136).

I was raised in a remote rural community in NYS that shaped an appreciation for rural communities and schooling. I maintain that rural places and schools should be considered unique arenas of learning and studied for their own needs, challenges, and merits in research and policy. I am also a former teacher with experience in urban, suburban, and rural schools. The
combination of experience in places across the rural-urban spectrum informs a consciousness of the distinctive merits and challenges of schooling across place and importance for researchers and policymakers to be attentive to such distinctions. Currently, I am employed by NYSED however I have not been involved with any of the policies sampled or have direct engagement with or oversight of any schools districts in NYS that may cause a conflict of interest. The office I am employed in has no connection with or stake in any of the policies sampled, nor does it have any investment in the findings of this study.

Limitations

Several limitations exist in this study. Qualitative research typically deals with a smaller sample size which facilitates more in-depth, detailed analysis but is not a comprehensive study of the whole system. My study included only three rural public school districts in NYS and four state education policies, which represent a small slice of the state’s education system. This study was limited in regard to the availability of recent state education policies to sample for analysis, including the policy enactment and implementation delays caused by the onset of the COVID-19 pandemic. This study does not consider the process of policy design but rather begins with the final product to investigate its relationship with the process of policy implementation, and interviews as few as one state representative for each policy. Further, only senior school leadership were interviewed from each district. This small sample is true to the exploratory nature of the study but limits the generalizability of the findings. The experiences and recollections of other school personnel, teachers, students, parents, and community members on the process of policy implementation were outside the scope of this study.

Despite these limitations, this study contributes an exploratory look at the relationship between state policy design and rural school district will and capacity to implement these
policies. These findings reveal previously hidden dynamics in policy design and implementation for rural school districts and state policymakers. This opens the potential for state policymakers to be more attentive to the differences of geographic place in policy design and more cognizant of the social constructions and assumptions that may become embedded in policy design, as well as the benefits and shortfalls of the repetition and recycling of certain tools and solutions. Increased attention to the realities of place in policy design may improve the efficacy of policy solutions and allocation of resources and supports, including community relations and environmental buffers, as well as improved understandings of differing capacities, strengths, challenges, needs, and interests of rural school districts. This study provides a foundation for future research on the relationship between policy design and policy implementation across place, policy design elements that may provide evidence of metro-centric ideology, and similarities and differences among the perceptions of rural school district leaders and state education officials regarding rural education policy.
Chapter 4: Findings and Analysis

The findings from the interview and document data collected in this study will be presented by similarities and differences among policies and across districts for each research question. This chapter ends with a summary of the findings and analysis.

I. Research Question #1: Policy Design

My first research question was: What are key similarities and differences in the design of a purposive sample of four recent New York State education policies? The findings for my first research question will be presented by (a) similarities and (b) differences in the policies as designed.

A. Similarities in Policy Design

1. Student Protection and District Control

The first key similarity among the four policies sampled is that the general purpose of each was to protect students by targeting factors within the district’s control. All interviewees believed that each policy was rooted in a “good idea” intended to benefit students through different facets of schooling, though none of the policies were designed to target any specific needs for rural school students. Regarding Meal Shaming, Regent B explained:

Food shaming became part of the anti-bullying campaign, where kids are constantly picked on. We need to incorporate, we need to give guidance [so that] anybody who has face-to-face with kids during a day has to be aware of equity in how they’re spoken to, sensitivity into how they’re feeling, [and] knowing a little bit about their life.

Meal Shaming was embedded in broader pursuits for social-emotional awareness to address the stigmatization of impoverished students whose families struggled to cover meal charges. The Meal Shaming policy was intended to protect the student from suffering any social or emotional
trauma in the school lunch line due to their family’s financial insecurity. Regent B explained that “we have to take a look at what you can and cannot control” within the school building in order to protect the student. With that, social-emotional awareness among teachers, leaders, and staff is an important first step. “I think it’s in the benefit of the kid, which is why we’re here” explained the Fringe Superintendent: It helps us “to be where we want to be, which is…student-centered education.”

Interviewees shared similar sentiments regarding the second policy, Professional Learning. The NYSED Professional Learning Official explained:

The idea behind these regulations is… when we think about what matters for student success, when we look at in-school factors, one of the most important things really is the quality of teachers and school leaders that students have access to.

Like Meal Shaming, the policy for Professional Learning looked at what was within the control of the school district to protect the student, in this case from an inequitable education. “It’s fundamentally a really good thing,” explained Regent B, because “putting an unqualified person in a position is a formula for disaster and that creates an even greater barrier in finding a certified individual in the area.” The NYSED Professional Learning Official explained that all of these pieces are viewed as part of a bigger system and the policy is designed to support its cohesiveness:

No matter how well-prepared [teachers] are, once they’re in schools as teachers-of-record, they need to have opportunities for growth and experiences that help them grow as professionals to ensure they’re able to meet the needs of students.

Professional Learning is then one key element in educator effectiveness designed to enable all teachers to meet student needs.
Likewise, the Student Data Privacy policy was designed to protect students by requiring districts implement safeguards and practices to control for the risk of exposing personally identifiable information (PII). Regent B explained: “Student data privacy… is extremely important… The question is: Who has the right to know the information?” The Student Data Privacy policy responds to the risks associated with increased use of technology, virtual platforms, and data collection in order to protect the student’s right to privacy. Regent B explained that student data privacy is a complicated issue that centers around assessing need and protecting control:

Educators in the classroom who teach want the testing data. If you don’t tell me what the students are doing, how am I supposed to use that information to adjust my practices in teaching? I think it’s really important that we protect it, and we really have to watch who gets it and how much they get: Do you need gender as a factor? Do you need race as a factor? Do you really need to know whether they have two parents or a guardian or living with grandma? What we have to really look at the policy is what information is critical. It can all be in a central place, but it has to be vetted for the need. Interviewees again shared a belief that the core intention of this policy was good. “I understand what they’re trying to do,” the Fringe Superintendent explained. “When we explain to [teachers and staff] why and said: Hey, listen, how would you feel if your kid’s personal information was out there for everybody to find out? They get it.” The policy is intended to protect everyone in the district.

Like Student Data Privacy, the policy for School Safety Plans requires districts to implement safeguards and procedures to protect students from harm. “It’s supposed to be a safe and secure environment for the students,” Fringe Principal C explained. “I just have that attitude
like… [student harm is] not going to happen on my watch, and I’m going to do everything I can to prevent those type of things.” State-level interviewees shared similar sentiments: “I think the safety concept is strong,” Regent B commented, and NYSED School Safety Official A explained that “it’s important work, so it feels rewarding and there’s a lot of need.”

Like Meal Shaming, the policy for School Safety Plans has a social-emotional piece to its protections. “Those safety plans not only save lives, but they prevent fear. They prevent inordinate behavior,” Regent B explained. “You’re not only preparing [students, teachers, and staff] physically, but emotionally” by having these plans in place to practice. More so than the other policies, school safety was described as an area that “is so important to everyone…not just kids” (NYSED School Safety Official A). The regulation requires school districts develop both a building-level safety plan and a district-level safety plan so that the district-level plan can be published and shared with the community, while the specific, confidential information is kept private in the building-level plan, NYSED School Safety Official A explained. The confidentiality of the building-level plan provides another layer of protection for the student, similar to Student Data Privacy, by limiting control of who has access to the information.

2. **Responding to National Concerns**

The second key similarity in the design of these policies is that each were developed in response to topical issues in education and schooling nationally publicized in the media or in leading scholarship. None of the policies appear to have been born solely from local concerns in NYS and no rural-specific needs influenced the design of any of the four policies. Regent A explained how “policymaking is done through the Board of Regents” but begins with identifying issues and need:
Ideas come up from the public, from the community, from our professional organizations, and sometimes they find their way to the Board of Regent’s attention and we decide that’s worthy of us spending some time on and assign it to some part of the State Education Department.

However, “in most cases, something happened and all of a sudden we have to have [a new requirement or policy],” Regent A continued. Initiatives are often dictated to NYSED from the legislature or in response to another directive, such as an audit or federal legislation, and resemble more of a “top-down” approach. For each of the four policies sampled, the pressure or incentive to address the identified problems does not appear to have come from local, NYS public school districts, and none from rural-specific needs, but do have clear links to larger popularized topics and issues in education and schooling.

NYSED Meal Shaming Official A explained that the Meal Shaming policy “was dictated by the Department from the Governor’s initiative. So, it’s not something we pursued, or the Department pursued, it was part of what the Governor proposed or implemented in that year” and was tied to directives from the United States Department of Agriculture (USDA). However, Regent A appeared to believe the issue might not be as prevalent in NYS schools as suggested in media, stating: “I’m not in schools every day for one, but I’m not sure…how big a problem I think it is.” Meal shaming had been a nationally publicized issue. The Distant Superintendent recalled:

News stations started carrying stories about kids that were shamed and what some of the school districts were doing throughout the country to kids that had negative accounts… I don’t understand why anyone would do that to a child, the way they were shaming them… I think it was kind of an outcry of that.
Other district interviewees shared similar thoughts on the publicized nature of the issue of meal shaming prior to the policy’s enactment. “We’ve heard horrific stories about students really being humiliated at lunchtime or school breakfast…because of lack of ability to pay…which is deplorable,” the Remote Board of Education (BOE) Member recalled: The policy appeared to be “definitely very, very reactive” to that and the State seemed to be “making some broad assumptions that this is a problem everywhere and this is a difficult problem for everyone.” The Remote BOE Member emphasized that the reactionary nature of the policy does not make it any less of a “great policy” and explained that a single case is one too many, which was a sentiment most interviewees shared on this issue.

Professional Learning differed from the other policies in any sense of being reactionary or responding to news stories and other issues publicized through media; however, there are fundamental similarities. State and district interviewees noted that professional development is a prevalent topic in scholarship tied to issues of teacher recruitment and preparedness, cultural awareness, equity, school choice, teacher turnover, and other popular topics surrounding education and schooling both in scholarship and public discourse. The NYSED Professional Learning Official explained how many of the considerations embedded in the policy came from “what we know about professional development” from leading scholars and publications. The issues that drove the Professional Learning policy, including preparation and retention, like those of the other three policies sampled are popular issues in today’s society.

Similar to the other three policies, Professional Learning does not appear to have come “from the ground up,” but rather from federal ESSA rules. “When we were developing our ESSA plan,” the NYSED Professional Learning Official explained, educator effectiveness was “one of the things that we keyed in on.” Title II of ESSA is dedicated to educator effectiveness,
with references made to pursuing improved professional development under permittable types of state activities for use of funds in Part A (USDOE n.d.). In the revised ESSA state plan guidance published by the USDOE, supporting effective instruction includes improving skills of educators and teacher preparation (§2101(d)(2)). This section was included in NYS’s approved ESSA plan with professional development as one of the key components of the educator effectiveness framework. With these ties to federal requirements, Professional Learning shares some similarity with the other policies as an issue that does not appear to have come from the local-level or rural-specific needs.

Student Data Privacy, like Meal Shaming, was born from a publicized issue. The Remote Regional Information Center (RIC) Representative explained that just prior to 2014 there was an “organization that was looking to build a data repository across the nation.” This organization, InBloom, was “a quasi-non-for-profit …looking to build a central data store in various states.” In NYS, the Remote RIC Representative explained:

There was a parent advocacy group in New York State that was very adamant about having a private company or not-for-profit having access to the student data. So, they took a case to court… The parent advocacy group…lost the court case. InBloom was viewed as having the correct data protection mechanisms in place, and they could go on and build this data store. However, “the parent community still pushed back and eventually New York State pulled out. New York State was one of the last states to pull out of this…and then what evolved from that was [the Student Data Privacy policy]” (Remote RIC Representative). Unlike the other policies, Student Data Privacy had engagement from the local-level with the parent community; however,
NYS’s public school districts did not appear to have raised the issue and the pressure for a legislative solution seems to have come from the dissolution of the national pursuit.

The School Safety Plans policy likewise was pursued following nationally publicized issues with the clearest links between the initial adoption of the regulation and each subsequent amendment to national events among the four policies. “The intent of the legislation was to prevent mass casualties in the event of an active shooter incident,” NYSED School Safety Official A explained. The original legislation was enacted after Columbine and the policy has been revisited after subsequent national school shootings, such as Sandy Hook. School safety has become a very publicized issue following the tragedies that have occurred nationwide. “It’s become something that I think we…are more in tune to the possibility of something like that happening these days than we were 30 years ago,” NYSED School Safety Official A explained:

We’re very fortunate in New York that there have been very few incidents of violence involving guns in school. There have been a few actually, but none that involve mass casualties. But we all have vivid memories of where we were and what we were doing when we found out about some of the horrible tragedies that have happened elsewhere in the country.

Other interviewees, such as the Remote BOE Member, shared the same sentiments as Meal Shaming regarding one case being too many.

National outcry following these tragedies appear to be the driving force behind reconvening task forces and revisiting statutory requirements; however, the most recent amendments to the School Safety Plans were in response to an audit. NYSED School Safety Official A explained: “We were audited two years ago, SED was audited, for our oversight of school emergency response planning efforts.” There were several audits related to school
emergency plans, and others on school safety issues in some schools and districts and in New York City. NYSED School Safety Official A explained that “the results were not very good…. In many different areas, SED’s oversight of what schools were doing was found lacking and schools’ understanding and implementation of the requirements was also found lacking.” Similar to the other policies, School Safety Plans does not appear to have been an issue raised from the local-level, and not from any rural-specific concerns, but was instead reactive to national tragedy and state audit.

3. Existing Resources and Local Decision-Making

A third key similarity in the design of the four policies sampled is the expectation that districts could comply with the policies without new or additional funding or resources beyond NYSED guidance documents. State-level interviewees for each policy stressed that NYSED is and should be seen as an entity that provides support and guidance to schools and districts, while operational decisions are and should be left to the districts’ control. Each of the four policies were designed with the expectation that once presented with the policy requirements, schools and districts were then responsible for determining how to implement the mandates. No funding or other financial support was attached to any of the four policies. Additionally, the financial and human capital necessary to comply with the policies do not appear to have been central considerations in the state-level interviewees’ descriptions. Instead, districts “haven’t had a choice” but to figure out how to comply with the requirements of each policy by using their existing funding and resources (Regent A).

With Meal Shaming, Regent B noted that “cost became a huge issue” for schools and districts with larger challenges surrounding cafeteria funds and meal charges, but NYSED Meal Shaming Official A explained that collecting unpaid meal charges is a responsibility left to
schools and districts to find a solution to: “That’s a local decision, really local school decision on how they do that.”

Each school has their own different policies on how they do that…they all go about it differently. It’s very difficult to be specific when it’s all of New York State and every single school district and non-public school in this state operate these programs a bit differently.

While Meal Shaming was not designed to address the collection of unpaid meal charges, the requirements of the policy are connected to the financial capacity of districts. “The USDA allows the school to set limits to say you know what, you have 10 charges and now we can turn you away completely,” NYSED Meal Shaming Official B explained, but “New York State’s policy doesn’t.” The state-level interviewees explained that “meal charge” and “meal shaming” are two separate policies, and while districts were encouraged to update their meal charge policies to add meal shaming, financial capacity does not appear to have been a consideration with Meal Shaming specifically.

Regarding Professional Learning, Regent A commented that funding is always a huge issue: “There are districts that are on the verge of bankruptcy. How do you do what’s right by kids when you’re that worried about money?” However, schools and districts needed to meet the requirements using their existing funding and resources. The NYSED Professional Learning Official explained that an “important part about the PD plans is that they’re developed at the local level…collaboratively. Not imposed upon educators.” There are some requirements, but:

The place where we stop is then we ultimately say: But it’s up to you to decide who’s going to provide those experiences and what they look like… We’re not going to dictate a specific modality or type of experience that teachers have, but we’re going to say
whatever you come up with it has to be driven by needs, who is identified has to be responsive to those needs, and the approach that you take has to have some kind of evidence-based supporting it.

The Remote BOE Member explained that “most of [State Ed’s] mandates are unfunded,” which can be “very challenging” because of the financial cost that does not appear to have been considered as part of the design of the Professional Learning policy.

More so than the other policies, financial costs to districts were embedded in the design of Student Data Privacy, which led districts to purchase cyber insurance and required schools and districts review all the software they purchase and use to ensure that the vendors sign a data privacy agreement as part of their contract. It appears that this requirement impacts the ability of schools to use free services in particular, whose vendors the NYSED Data Privacy Official explained may be less likely to sign the agreement. Schools and districts are required to find an alternative service when the vendor does not sign the privacy agreement. With Student Data Privacy, schools and districts “are supposed to design their own policy,” the NYSED Data Privacy Official explained: “There’s no prescription as to what must or must not be in the policy” as long as the specific mandates are met.

The NYSED Data Privacy Official explained an awareness of the challenges in complying with mandates without funding, commenting that “you need resources. Resources cost money. These risk assessments need to be done – they cost money.” A central point raised by the NYSED Data Privacy Official was that the necessary services to comply with the mandate do exist, the schools and districts just need to connect with them and, in the absence of funding, determine if they can cover any potential cost using existing funding. “That’s always something we have to think about and factor in,” the NYSED Data Privacy Official explained. “The fact
that some of the BOCES have developed tools around these they charge for, and so…these services exist, but they are not free.” The NYSED Data Privacy Official explained that districts often “say nothing else exists, but that’s not always true. Maybe nothing free exists, but there might be a paid version somewhere.” However, while NYSED tries to put out a free equivalent when it comes to policy or data agreement templates, the expectation appears to be that districts lacking the in-house capacity to comply with the mandates of Student Data Privacy will turn to the services offered by their local BOCES.

Regarding the School Safety Plans policy, NYSED School Safety Official A explained that the intention is for schools and districts to determine what practice “makes sense for [a] particular school building” instead of mandating practices that “maybe wouldn’t [make sense] for one in a different area of the state.” Schools and districts must therefore decide locally what plans and practices need to be in place to align with their local conditions. NYSED School Safety Official A explained:

Essentially, that is the intent. That it’s specific to the school and the population of the school. So, the plan in a high school might be different from the plan in the elementary school or a school for students with disabilities.

The policy, however, appears to share the expectation that districts could use their existing funding and resources to support this local decision-making, implement safety practices and meet local safety needs, which were less about financial cost and more about time and human capacity, discussed below, according to the district interviewees. Financial considerations or cost were not mentioned by the NYSED School Safety Plans Officials, though these interviewees explained how NYSED had been awarded a grant to provide training statewide in support of the requirements of this policy, which began in early 2021.
Human capital and time were also discussed by interviewees as critical resources needed to comply with the mandates of these policies. “Human capital is a very large portion of your budget,” Regent B explained. It has a cost, and it has limits. “A plate is a certain size, there are parameters. And once the plate is full, if I put another meatball on it, something falls off.” The Remote BOE Member explained that “whether you’re talking about spending actual dollars or spending time doing it,” in either case it “equates to actual money” and a very real cost to implementing this policy. Each of the policies sampled involved some additional use of human capital, such as forming teams, conducting analysis, or communicating with vendors or families, that schools and districts were again expected to fulfill with their existing resources. None of the policies addressed differences in local resources and capacity among schools and districts.

B. Differences in Policy Design

1. Engaging with Stakeholders

A key difference in the design of the four policies was NYSED’s engagement with stakeholders during policy development. Meal Shaming differed from the other policies here because the policy was a Governor’s initiative tied to USDA requirements. “When the Governor’s initiative came in, we just had everybody update that meal charge policy and it became a meal shaming…policy,” NYSED Meal Shaming Official A explained. NYSED’s Office of Child Nutrition was already collecting and reviewing school and district meal shaming policies prior to the regulation’s permanent adoption, according to state-level interviewees.

The Regent item that accompanied the permanent adoption of the regulation summarized the results of the 60-day comment period, including the Department’s responses. Most comments focused on concerns about the ability of schools and districts to collect unpaid meal charges. The Department’s responses mostly expressed sympathy for the concerns but then
explained that they were either outside the scope of the regulation or misunderstood the regulations, often stating that the regulations “implement the requirements of the statute” (Ebert 2019). The Department recommended “only technical, non-substantial revisions” to the regulation (Ebert 2019). Representatives from other state departments or the Governor’s office were not interviewed as part of this study, but there does not appear to have been much engagement with stakeholders by NYSED prior to dictating the Meal Shaming policy to schools and districts. No engagement from rural stakeholders was mentioned or documented.

Professional Learning entirely opposed Meal Shaming in regard to stakeholder engagement. Regent B explained that collaboration with stakeholders was a key influence over the development of the Professional Learning policy from the beginning, particularly between NYSED and teacher unions. “Both sides agreed that we needed to provide growth and development. Just like lawyers and doctors take service credits or professional learning credits, educators need to do the same,” Regent B explained. “Now the question came: How do you provide this and how do you make sure that everybody participates? So, the policy became, and it’s changed over time” with continued stakeholder feedback.

With Professional Learning, collaboration with stakeholders was described as an important focus both in the development of the policy, and as a central element in the implementation of the policy in districts. The NYSED Professional Learning Official explained:

That was another really important piece for us, is that idea that it has to be a collaborative process that teachers are involved in. Because if we want them to really take advantage of PD and for it to have its intended effect – that’s another thing that we know that research tells us about professional learning is that…you can’t do it to somebody. They have to be actively involved in it in order for it to have the intended effect.
In designing the Professional Learning policy, the NYSED Professional Learning Official described a focus on ensuring that stakeholders were engaged in the development, including bringing together an advisory board to develop the regulations. The NYSED Professional Learning Official described at length how NYSED not only worked to ensure representation from all relevant stakeholders in the development of the policy, but also worked to design the policy to ensure stakeholder engagement was a core part of policy implementation as well by requiring representation of certain stakeholders on the local professional learning teams, including rural representatives.

Also different from Meal Shaming, NYSED experienced much more engagement from the public comment period in the recent amendments to the Professional Learning policy. “When we revised the regulations, I think it ultimately took us, I want to say at least 9 or 10 months to have them permanently adopted by the Board,” the NYSED Professional Learning Official explained:

Every time we revised them, we received more sort of comments and feedback. And so, we took that all into account…ultimately, I think we amended the regulations four times before they were permanently adopted. And all of that was in response to stakeholder feedback.

Regent B explained that the stakeholder feedback tended to be directed at specific requirements, such as time commitments which were the focus of many of the revisions following the public comment periods (D’Agati 2019-April). More so than the other policies, ongoing discourse with stakeholders appears to have been central to the development of the Professional Learning policy.
Student Data Privacy appears to have been more similar to Professional Learning than Meal Shaming in regard to stakeholder engagement in that there were early work groups during the initial development of the regulations. NYSED appointed a council of diverse stakeholders in 2017 to lead the development of the regulations. The council then created two work groups to draft the regulations and develop the technical standards (D’Agati 2020). The NYSED Data Privacy Official explained that consultation with school districts to gather feedback on different positions, concerns, and recommendations was a focus during the design process and described how NYSED attempted to include statewide representation from all types of educational agencies:

We put together a team of staff from school districts, from BOCES, from RICs, from charter schools, and across the board, and we worked with them on that, and then New York City. But I really don’t know...how much representation, if any, we did have from...what you would classify as a rural school...a lot of this went back through the RICs too, so we vetted a lot of the information through the RICs and the BOCES that cover all these districts, including the rural districts. And so, I believe that at least even if they didn’t have a physical person at the table, their positioning was considered in some of the feedback that we received.

Feedback was also solicited from the public through a series of fourteen public forums held across the state, and NYSED further created an implementation workgroup of representatives from the field to support the adoption of the regulations. In a January 2019 Regents item, NYSED officials described the “input received from all stakeholders” as “critical to developing these regulations” (Berlin 2019-January).
Unlike Professional Learning, stakeholder engagement was not built into the design of the Student Data Privacy policy with the intention of it being sustained long-term, but rather appears to have accompanied adoption and implementation as a source of support. When NYSED “first started doing the work around the regulations, they had a workgroup,” the Remote RIC Representative explained, which consisted of representatives from schools, RICs, BOCES, and New York City representatives. “I was part of that initial group, and we haven’t met in two years,” the Remote RIC Representative added.

Student Data Privacy also differed from the other three policies with regard to the public comment period. Like Professional Learning, Student Data Privacy was developed over a longer time period and went through three public comment periods prior to adoption. The Remote RIC Representative explained that RIC One monitored the development of the policy and “there weren’t really a lot of substantive changes from what was originally proposed. There were requests that things be changed that did not transpire.” The January 2020 Regents item that accompanied permanent adoption of the regulation details the revisions made to the regulations following the public comment periods. Following the first and second public comment periods, revisions to the regulations focused on clarifying the requirements as written and ensuring conformity with statute, similar to Meal Shaming and unlike Professional Learning. No revisions followed the third public comment period (D’Agati 2020).

School Safety Plans again differed from the other policies in terms of stakeholder engagement during design. NYSED School Safety Official A explained that the legislation created a “NYS School Safety Improvement Team, which is a multi-agency advisory committee” and “there was a statewide task force appointed” by the Board of Regents. Unlike the other policies, School Safety Plans was designed to be a multi-agency initiative, which NYSED
School Safety Official A explained was viewed as important for effective implementation:

“Working with the State Police on this project and others who are far more knowledgeable about the nuances of individual incidents,” such as what we learned from mass national tragedies is important because “SED isn’t the one who’s going to show up in an emergency.” Similar to Professional Learning, the School Safety Plans policy was designed to ensure continued engagement with local law enforcement and first responders through policy implementation as well.

Also different from the other policies, School Safety Plans did not receive any comments during the 60-day public comment period prior to permanent adoption (Berlin 2019-September). Instead, NYSED School Safety Official A explained that revisions to the School Safety Plans policy over the years came from recommendations from the Safe Schools Task Force, convened by the Board of Regents. “Representatives of the school districts are included in…the task force, as well as representatives from pretty much every NYS education association,” NYSED School Safety Official A explained. With the School Safety Plans policy, stakeholders were primarily engaged through these task forces to make recommendations related to policy design. The NYSED interviewees were unsure if these early task forces included any rural representatives.

II. Research Question #2: Policy Implementation

My second research question was: What are similarities and differences in the will and capacity of a random sample of three rural school districts in New York State to implement these education policies? The findings for my second research question will be presented by (a) similarities and (b) differences in the will and capacity of rural school districts to implement each policy.
Meal Shaming

A. Similarities in Policy Implementation

1. Will – Perceived Need

A key similarity in the will of rural school districts to implement the Meal Shaming policy was the perceived need for the policy. All district leaders emphasized that Meal Shaming was a “good policy” and “important” even if the issue of meal shaming was not prevalent in their schools. In each district, leaders believed that the policy was beneficial to some extent but emphasized that the small size of their schools and communities meant that they had addressed meal shaming issues long before the regulations were adopted. In the Fringe Rural District, the Fringe Director of Special Programs (“Fringe Director”) explained that the district’s policy used to be that students would have to “dump their meal and go back and get a peanut butter and jelly sandwich” years before the regulation was enacted. However, at the time the policy “made no sense to most of us [and] a lot of us did not feel that was a fair policy,” and by the time the regulation was adopted, “we were already beyond it. We already had kind of corrected it.”

The building principals in the Fringe Rural District all shared beliefs that meal shaming was not a significant issue in their schools, mostly because of the small size of the district and close-knit community. “Something like meal shaming is very low on the list, because our kids and our staff function as a family in the small community,” Fringe Principal B explained. Fringe Principal A added:

If a kid is or a family is struggling, we’re going to do whatever we can do to take care of them. Kids don’t point out other kids when it comes to whether or not they’re paying for the lunch or not or bring it up. So, I’m not going to say something isn’t there, but it’s not an issue.
“Our district is so heavy with free and reduced lunch anyway,” Fringe Principal A continued, “there’s probably a really small segment in there that ran into issues.”

However, in the high school building Fringe Principal A did find that a benefit of the policy was in helping families apply for free and reduced lunch. “What we found with the meal shaming is a lot of the people qualified for free and reduced lunches, but never filled out the paperwork,” Fringe Principal A explained:

There’s a little bit of a stigma…with the paperwork. The accessibility, getting the paperwork done – it is kind of cumbersome, it’s a few pages. And not to sound disrespectful, but some of the cognitive state of some of the families that we’re working with, they look at that like I’m not doing that. So, if I can link up one of my school counselors or myself or a guidance department to help them fill it out and let them know there’s no shame in it, I think that’s going to start to reduce…probably the majority of the meal shaming.

In the Fringe Rural District, the leaders explained that a main goal of the Meal Shaming policy, as they perceived it, was to ensure their students were getting fed by helping connect their families with the resources and supports they need to make sure none of their students felt ashamed of their financial struggles.

Similarly, leaders in the Distant Rural District believed that the Meal Shaming policy introduced some benefits to their district. “We had like one cafeteria worker who was just belligerent to students. And even though you try to talk to that person many, many times, it didn’t seem to sink in,” the Distant Superintendent explained. “I think it was beneficial once we had the policy in place and we provided the training to the staff again on the expectations.” Like the Fringe Rural District, leaders in the Distant Rural District explained that efforts were being
made to end meal shaming before the regulation was enacted and that the issue was low on the list of school needs, mostly because of the small size of the community. “This is a very close knit community that they understand the needs of people in the community and in the school,” the Distant Superintendent explained, sharing that the community has covered the deficit in the district in the past. The Distant Director of Special Education (“Distant Director”) added that when the community comes in to cover the deficit and pay off unpaid lunch fees for other families, it becomes a “non-issue” because the community is working together to ensure all their students are fed.

Leaders in the Remote Rural District likewise explained that anti-meal shaming practices were already in place in their school building before the regulation was enacted. “This wasn’t a big one for me, it was a no-brainer,” the Remote Superintendent explained:

This is one of those things that I, as a leader, was making sure wasn’t occurring before this policy ever came out… That’s just good leadership to make sure that your kids are not in a position where they feel uncomfortable ever from another student or an adult. “To my knowledge, we would always give them the meal and then just contact the families,” the Remote Board of Education (BOE) Member explained. Similar to the comments of leaders in the other districts, the Remote Principal explained that the small size of the community “makes it easier to recognize the need and be responsive.”

I have never experienced a situation in our district where I have felt like we’ve even needed a policy that said we can’t do those things. We can’t publicly announce who owes money, we can’t give a consequence to kids that do, we can’t deny them a meal – I don’t think our district would ever do anything like that.
However, while the Remote Rural District leaders shared that they did not perceive that their district had any real need for the Meal Shaming policy, they still believed that the policy benefited their district by making the district’s position on the issue clear.

2. **Capacity – Eases of Implementation: Existing Practices**

A key similarity in the capacity of rural school districts was that existing practices eased the implementation of the Meal Shaming policy. All three rural school districts described having already implemented anti-meal shaming practices prior to the enactment of the regulation. Each district interviewee also commented on how the small size of their districts made it easier to identify students in need and connect with their families, thereby placing school leaders in a better position to implement anti-meal shaming practices sooner.

In the Fringe Rural District, implementing the Meal Shaming policy was a process of “taking the letter of the law and then transferring it into practice,” Fringe Principal A explained. Prior to the regulation, the district had already stopped discussing unpaid meal charges publicly and helping families that qualify for free and reduced price lunch. Under the new policy, the Fringe Director explained:

If they really racked up a high amount on their account, then we would meet with that student independently and talk to them about what we could do to support them. And then reach out to their parents as well and if we could, if we thought that they might qualify, we’d get them on the free and reduced lunch plans.

Fringe Principal A added that “we’re very big on: Hey, if there’s something you need, there’s no shame in anything. You let me know, I’ll get you some county resources.” With these existing practices, the implementation of the Meal Shaming policy in the Fringe Rural District came down to seeing if “there’s a way to catch things beforehand or do things a little bit less
dramatically and overtly” to make sure no students are feeling any shame, Fringe Principal A explained.

Similar to the Fringe Rural District, leaders in the Distant Rural District described early commitments to anti-meal shaming practices. “Our role is not to embarrass kids,” the Distant Superintendent explained, but to “work with parents. So, I directed my food service manager at the time to make sure that he was reaching out and calling the parents to let them know about their negative balances.” The Distant Superintendent added that the small size of the district made it easier for the administration to correct issues sooner:

   In a small rural school, because of the cohesiveness of everyone, you find out about these things and you’re able to put your own policies in place, even though it’s not a true policy. But you make rules that doesn’t allow that to happen anymore once you find out about it. Whereas when you’re in a larger area, usually administration will never know about things that are happening because you have other people running that program and unless they actually inform you, you’re not going to hear about them.

Like the other two districts, existing practices in the Distant Rural District mostly aligned with anti-meal shaming practices required by the Meal Shaming policy.

In the Remote Rural District, the Remote Superintendent likewise explained that existing anti-meal shaming practices eased the implementation of the policy. “Our response has always been to encourage them to fill out a free and reduced lunch application,” the Remote Principal explained. “We’re so small and so rural and have such a high-need population that we’re pretty responsive to the needs of the community.” Similar to the other districts, the Remote BOE Member attributed the existing practices to the small size of the district: “We are a small district, and… among small districts, when John or Jane goes through the lunch line…the person at the
register knows them… It’s different than a large district where there’s 2,500 people coming through the cafeteria or more.”

B. Differences in Policy Implementation

1. Will – Reactions to Policy Adoption

A key difference in the will of rural school districts to implement the Meal Shaming policy was the initial reactions of the leaders in policy adoption. All district leaders interviewed shared the belief that the policy afforded some benefit to their schools, whether in supporting completion of free and reduced meal applications in the Fringe Rural District, addressing the actions of certain staff members in the Distant Rural District, or just emphasizing the position of and accepted practices in the Remote Rural District. However, each district had different experiences with their BOEs in adopting a district meal shaming policy.

In the Fringe Rural District, each district interviewee recalled that Meal Shaming had generated a lot of discussion and pushback from their BOE. The district’s published BOE minutes document ongoing research and consultation with the school attorney surrounding concerns raised by the BOE about the impact the requirements of the Meal Shaming policy would have on collecting meal charges. These minutes report that the Fringe Superintendent spent days researching the policy requirements and discussing them with the school’s attorney, followed by extended conversations at BOE meetings (“Minutes” 2018). The Fringe Rural District’s meal shaming policy does not appear to be posted on the district’s website in early 2021; however, the district has a webpage dedicated to school nutrition services, including the application for free and reduced price meals and online payment services.

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18 The Fringe Rural District was the only district sampled that contained multiple school buildings. Only the high school building was required to adopt a meal shaming policy since the district is able to provide free meals to all students in the elementary buildings.
Fringe Principal A explained how leaders in the district were conscious of the complexity of the meal shaming issue and their BOE’s pushback:

Some of our families live in crisis mode all the time or survival mode and those are small things for them, to fill out paperwork. And we have a lot of families that may struggle on the SES side that take a lot of pride and they’re like: Nope, we’re going to figure this out. I don’t need help or support from the school district. And then on the other side, you also have families that want to take advantage of it. That are way overqualified for any free and reduced type of lunch but think that they’re entitled or have a right to it as well. So, it’s a tricky one.

The Fringe Superintendent explained that their BOE was concerned with the cost, taxes, and potentially off-setting other programs. However, the Fringe Superintendent described coming out as an advocate for the meal shaming policy and working with the BOE to understand the need and benefit it would have in their district. The Fringe Superintendent explained: “I went to school with a lot of these people on the Board, so I would say to them: Hey, remember?” because “back then, if you paid attention, everybody would have known who got free and reduced.”

Unlike the Fringe Rural District, adopting a meal shaming policy appears to have solicited little, if any, discussion in the Distant Rural District. The district’s meal shaming policy does not appear to be posted on the district’s website, though the application for free and reduced meals is available online and the district has an online payment service. Further, there does not appear to be any discussion of the meal shaming issue or policy adoption in the Distant Rural District’s published BOE minutes.

More similar to the Fringe Rural District, leaders in the Remote Rural District explained frustrations with the policy as written. “That policy is great but they’re not looking at the big
picture again,” the Remote Superintendent explained. The Remote BOE Member explained that there did not appear to be any reservations to the Meal Shaming policy itself, but that there were concerns about the potential cost to the district.\textsuperscript{19} “The challenging part or the frustrating part,” the Remote BOE Member explained, is that when a family owed money for unpaid meal fees, “previously the district was in a better position to be able to ask that family for money.” The Remote BOE Member explained: “Stopping school shaming, I think that’s critical. But you, at the same time, tie the district’s hands” because “not all families are upstanding… They know that at the end of the day, if they don’t want to, they don’t have to pay it.”

In the Remote Rural District, the policy appears to have been adopted with concerns about the larger cost that were noted but not pursued to the extent they were in the Fringe Rural District. “It’s tough,” the Remote BOE Member commented: “We don’t want people to think that the fact that we’re not happy about the financial impact means that we think students should be treated less than – it’s two separate issues… Unfortunately, one issue is related to the other.” The Remote Rural District appears to have accepted that the district may have to face the financial concerns raised after policy adoption. The Remote BOE Member reiterated: “We said we just have to eat it and…that’s hard to swallow, especially since we’re struggling financially.” The district’s meal shaming policy and application for free and reduced lunch is published on the district’s website.

2. **Capacity – Financial Challenges in Implementation**

A key difference in the capacity of rural school districts was the financial challenges each district faced in implementing the Meal Shaming policy. NYSED Meal Shaming Official B shared that NYSED “did find in that first year of the anti-shaming policy for districts that did

\textsuperscript{19} The BOE member interviewed was not the President of the Remote Rural District’s BOE and therefore not speaking on behalf of the BOE, but instead sharing personal experiences and reactions to these policies in the district.
have to implement one, was they had large amounts of unpaid meal debt that they were going to start collecting.” NYSED Meal Shaming Official A explained:

I think the biggest push back that I heard when we first implemented this was from schools about the fact that, with this policy, they’re required to provide a student with any reimbursable meal selection, whereas in the past if a student had outstanding meal charges, they limited their selection.

NYS’s Meal Shaming policy “was different from what the USDA had put forward,” NYSED Meal Shaming Official A continued, which “made that allowance that should a school decide to offer just the cheese sandwich as the reimbursable meal, instead of like the hot entrée, they could.” However, NYS’s policy prohibits that because “that is recognized as shaming, so they were no longer allowed to do that.”

All district interviewees explained that they understood the Meal Shaming policy was not designed to help schools and districts with collecting unpaid meal charges but pointed out that there was a financial impact. The Fringe School Business Official (SBO) explained that the Meal Shaming policy raised concerns about collecting unpaid meal charges: “At the end of the year, the general fund has to make the school lunch fund whole.”

Those parents who didn’t pay their charges are still not paying their charges, but who’s paying for those charges? It goes back to the general fund, and what does that mean? That means that everybody in the school district is going to get a little bit less because you had to use some of your general funds to subsidize those payments.

“To me, it seems like a bit of a stopgap measure that’s just an ineffective means of dealing with a chronic problem” with district funds, the Fringe SBO explained. “You’re almost telling parents: Hey, if your kids don’t pay for lunch, we can’t do anything about it.”
However, the Fringe SBO explained that the Fringe Rural District did not experience a significant financial impact following the adoption of a meal shaming policy, sharing that:

We’ve got one lady… She’s one of these ladies that has lived in the community now for probably 40 years or so and she knows everybody in town. She’s worked for the district for probably the last 30 or so years, and one of her duties has been to contact families and to work to collect the unpaid charges. And I think just because we have her and because of the unique relationship she has with the community, we really didn’t have much of an impact.

Despite concerns with the relationship between the Meal Shaming policy and issues with collecting unpaid meal charges, having an individual with close ties to the community appears to have kept the district in a position to continue to effectively collect unpaid meal charges.

Unlike the Fringe Rural District, leaders in the Distant Rural District felt a financial impact from the implementation of the Meal Shaming policy. “You have more unpaid lunch balances from certain parents,” the Distant Superintendent explained:

We do have some parents that just let it go and there’s no way of really collecting it because they know that their kids will still get the lunch that they want. The only thing that the students won’t be able to get is any of the snacks.

Implementing the Meal Shaming policy appears to have led the Distant Rural District to face increased financial challenges with balancing their food service accounts because of the new restrictions on collecting unpaid meal charges. The Distant Superintendent continued:

Now you had no teeth in collecting. Whereas before, if there was like a deficit when students came to the line, they would get a peanut butter and jelly sandwich. Now there’s
none of that. If the kid still wants the pizza or the stromboli or regular lunch meal, they’re getting that. So, there’s no incentive to pay off the debt that they’re acquiring.

With the Meal Shaming policy, the Distant Superintendent believed that, at NYSED, “they really weren’t thinking about the financial impact that it was going to have on school districts” in terms of being able to collect unpaid meal charges.

More similar to the Distant Rural District, leaders in the Remote Rural District shared experiences with increased financial challenges brought on by the implementation of the Meal Shaming policy. The Remote BOE Member explained: “I don’t remember the dollar amount, but since the policy has been implemented, we’ve seen bigger losses as far as the cafeteria that we had to make right.”

From a financial standpoint, it had an impact. Which I’m sure is not what the folks who develop the policy had ever thought about. They just thought about making sure that students are treated respectfully, with dignity – which of course they should be. That’s not the issue.

Similar to the Fringe SBO’s sentiments, the Remote Superintendent explained that “when they rack up a $300 bill and then you call home and call home and it doesn’t get paid, then that falls on our general fund.” So, as good as the intentions of the policy are, “again, we go back to the frustration of how do we combat kids charging on their account and then their parents not paying their bills?”

The Remote BOE Member added that not having some “threshold” or any reimbursement for the charges districts are unable to collect is “almost unconscionable – that the State says you just have to be willing to take the loss and smile about it.” The Remote BOE Member explained:
It’s unfortunate that the way the policy is written, the entirety of the policy has tied schools’ hands…it shows either a lack of understanding about what are the day-to-day operations of the school, the budget constraints schools face…or a lack of caring [because] someone could have said: This is going to cost districts a chunk of money and, for smaller districts, that’s a big problem.

Compared to the other districts, leaders in the Remote Rural District appear to have felt the most challenged by the financial impact of implementing the Meal Shaming policy.

Professional Learning

A. Similarities in Policy Implementation

1. Will – Perceived Need

A key similarity in the will of rural school districts was the perceived need to implement the Professional Learning policy. All district interviewees expressed the value of implementing quality professional development plans in their districts; however, most district interviewees believed that the Professional Learning policy was not necessary for their district. Rather, district interviewees in all three rural school districts felt that the policy was targeting districts unlike their own.

In the Fringe Rural District, the Fringe Superintendent highlighted how the Professional Learning policy supported teachers and leaders for the benefit of all, stating:

This policy makes sense. It’s doing the right thing; it’s protecting you; it’s protecting us, it’s making people know all the great things that we’re doing to stay on top of our game and stay up to speed on all the things that are education now.
“We definitely don’t want to be reactive,” the Fringe Superintendent continued, explaining how the district was devoted to making data-driven decisions. “If you didn’t have a game plan, we tended to do the same thing year-in, year-out with no statistical way of making ourselves better.”

The Fringe Rural District leaders expressed a shared value in the need for professional development and planning in their district; however, the district’s leaders did not appear to believe the policy was designed for a district like their own. The Fringe Superintendent explained:

In some respects, I like what the State’s doing by making us stay focused. But I also think that when you sit in Albany, they’re out of touch with what the practices here are – like trying to find a certified science teacher or certified Spanish teacher is like trying to find a unicorn.

The Fringe Superintendent believed that with the Professional Learning policy, “you’re really targeting a district that has no plan and is just kind of floundering,” which did not appear to be the case in the Fringe Rural District. “They’re trying to make sure you’re focusing,” the Fringe Superintendent explained, “but at the same time…putting those plans in place are for…the district that allows these people to continuously take professional development and do nothing with it.”

Similar to the Fringe Rural District, leaders in the Distant Rural District believed that the Professional Learning policy was not targeting districts like their own. The Distant Superintendent explained that the policy seemed like an unnecessary requirement for their district, where professional development was already structured into their operations. “Maybe in other districts that might not have a direction of where they’re thinking about going, or maybe a lack of communication to their staff what their future direction would be” the policy would be
necessary, the Distant Superintendent explained but, like the Fringe Rural District, that did not appear to be the case in the Distant Rural District. “I think that this is one of the areas where they should just leave…most schools alone.”

Like leaders in the Fringe Rural District, the Distant Board of Cooperative Educational Services (BOCES) Professional Learning Specialist described the value seen in the goals of the Professional Learning policy, explaining the benefit of NYSED “reinforcing the: Let’s not fly by the seat of our pants. Let’s actually use data to establish a baseline and move forward and really think…in year 3, in year 5, what do we want to actually see?” However, while leaders in the Distant Rural District felt that the goals of the Professional Learning policy were valuable, the State’s requirements through the regulations seemed unnecessary to the Distant Superintendent. “I just think many school districts already had this, so why do we need to go through a step just for the State Education Department to implement a plan or submit a plan?” the Distant Superintendent explained.

Leaders in the Remote Rural District likewise did not believe the Professional Learning policy was necessary for their district. “We were doing what we needed to do,” the Remote Superintendent explained. These policies seem more designed for districts that aren’t, where teachers haven’t received professional development and “these kinds of policies are really helpful.” The Remote BOE Member agreed:

I would say that the district was already really meeting the requirements of the mandate, because again professional development has been important to us. So, it wasn’t the case where I saw the policy and said: Oh, great! This is fantastic because now this will push us into the direction we want to go. No.
Like the other districts, leaders in the Remote Rural District believed that the purpose of the policy was good. The Remote Principal explained “my experience is that once teachers get into the classroom, they’re pretty focused on their classroom and what they’re doing. And many of them feel overwhelmed by the time commitment” for professional development. The Professional Learning policy provided additional support because “if I can say it’s coming from a requirement that we have to meet with the State, it’s easier than saying it’s coming from me,” the Remote Principal continued.

However, the Remote Superintendent added that “whenever there’s pressure from the community and administration and the expectation is laid out very clearly, most of them will do the right thing and buy into the training.” Similar to the Distant Rural District, the Remote Superintendent explained that setting these expectations in the district is part of being a good leader. “I think it’s really important, but I’ve always been a leader that has made sure we have professional development in some capacity. So, for me, it wasn’t something I needed to have to make me do it.”

2. Capacity – Eases of Implementation: Existing Practices

A key similarity in the capacity of rural school districts was that existing practices within the districts eased the implementation of the Professional Learning policy. As discussed above, leaders in all three districts explained that their schools were already providing ongoing professional learning opportunities to teachers and leaders. Further, each leader expressed a shared belief in the value of professional learning and described the policy’s requirements as actions that are a central part of being a good leader. With these beliefs, each district appeared to have many professional learning practices already structured into their daily operations.
The Fringe Rural District appears to have been in the best position to implement the Professional Learning policy by having a comparatively larger and more data-focused leadership team. The Fringe Superintendent described the implementation of Professional Learning as an opportunity to connect the district’s mission, vision, and values with their success measures, then incorporate professional development needs by asking: “How does it link to that, and how does it link to where we want to be in five years?” More so than the other district leaders interviewed, the Fringe Superintendent expressed a strong dedication to making data-driven decisions:

I developed success measures which looked at attendance, discipline, Regents scores, state assessments, graduation rate, and then participation rate across the entire district. And we utilize that because it has no emotion to it. The numbers are the numbers and either we’re doing good or not.20

Each Fringe Principal described similar commitments to making data-driven decisions and ensuring that professional learning is ongoing in their buildings. “My normal gig is making sure we are having data meetings, we’re making data-driven decisions,” Fringe Principal B explained. “One thing that we wanted to do is make sure kids knew what they were learning at all times and how it related back to the learning target.”

In addition to the data-driven pursuits described by the Fringe Rural District leaders, the Fringe Principals also expressed commitments to continuously encouraging their teachers to engage in professional learning, even if informally. “I think there’s a lot of value just in the water cooler talk, quite honestly,” Fringe Principal C explained:

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20 The Fringe Rural District’s success measures identify whether the data for each measure in each building shows performance as Highly Effective, Effective, Developing, or Ineffective (HEDI). Basically, each success measure is evaluated by how many points on the HEDI scale are earned out of a total 20 possible points per measure. See Appendix C: Fringe Rural District Success Measures
You go into the faculty room and you’re like… You’re not gonna believe this happened today in my classroom! And then it gets you thinking like, huh, how would I handle that? How would I do that in my classroom?

Each Fringe Principal seemed to feel that an important part of their job as leaders was to set an expectation for ongoing professional learning. Having these beliefs and practices already in place appear to have eased the implementation of the Professional Learning policy in the Fringe Rural District.

Similar to the Fringe Rural District, leaders in the Distant Rural District expressed a commitment to setting the expectation for ongoing professional learning and supporting long-term district goals. “We already knew what our professional development plan would look like,” the Distant Superintendent explained:

My experience has always been when you do professional development it always has to be repetitive. It has to be long term. It’s not a one shot deal. So… we already had a plan. We had priorities… [and] we already knew that was the direction we wanted to go.

“I think it goes back to that quality of leadership,” the Distant Superintendent continued:

Most competent leaders have those kind of professional development plans long term that you just don’t come up with like: Today, we’re going to do this, tomorrow we’ll do something different. You have those plans and are moving forward.

“There’s a lot of good research on professional development and what is effective for professional development,” the Distant Superintendent added, and good leaders “all want those types of plans in our district.” The Distant BOCES Professional Learning Specialist added that at the BOCES-level, specialists work with individual districts to explore and determine how to
bring district goals “together so it’s a much more efficient, smooth, thoughtful process” aligned with local expectations and priorities.

Leaders in the Remote Rural District likewise expressed the belief that part of being a good leader was ensuring that professional learning was already structured into the district. The Remote Superintendent explained:

We were already doing a lot. We had a new curriculum…so they were getting a lot of professional development through that… [and] there’s a lot of coaching that goes on at the level from our BOCES professional developers.

In addition to the professional development that was already ongoing, the Remote Rural District leaders each described long-term plans for other professional learning needs. The Remote Superintendent believed that structuring ongoing professional learning into the district is about setting expectations for teachers and leaders:

Teachers sometimes resist it because they feel like you’re saying to them that they’re not doing a good job… And I always say, it’s not about doing a bad job, it’s about doing a better job than what you’re currently doing. Because you find new ways to do things that meet our student demands of today versus five years ago.

“There’s only two of us [administrators in the district],” the Remote Superintendent added, which makes it more challenging to implement the Professional Learning requirements. However, the Remote Principal explained that in “the role that I previously served in… that was the crux of my job was writing professional development plans…it’s kind of in my wheelhouse.”

Like the other two districts, these existing practices appear to have eased the implementation of the Professional Learning policy in the Remote Rural District.

3. Capacity – Challenges in Implementation: Non-Financial Resources
Another key similarity in the capacity of rural school districts were the non-financial challenges related to access to opportunities and human capital faced in implementing the Professional Learning policy. Leaders in all three rural school districts emphasized that human capital was a valuable, but limited resource in their districts. The Fringe Superintendent explained that each member of their administrative team “all do multiple things. We all have many titles. We all do things outside of our title area” to meet State requirements and fulfil daily operations. The Fringe Rural District appears to have been least challenged by issues related to human capital because of the larger administrative staff compared to the other districts, though the Fringe Director explained “we’re a small district, but we still have to meet all the same mandates that larger districts do,” which creates additional challenges.

Access to resources and trainings in the implementation of Professional Learning was described as a leading challenge by leaders in the Fringe Rural District. Fringe Principal A explained that being designated a Target District (TD) has brought additional resources to their district; however, “it’s really hard around here” to access trainings:

Our BOCES isn’t necessarily fully staffed in terms of getting outside people to come in and train. And that’s kind of why, when the State offered us the chance to work with people at the state-level to teach our teachers and how to take digital learning and expand it through the staff, that was a place that we wouldn’t have access to if we weren’t on that list.

“Unfortunately, we’re just not at a point where we can access more people,” Fringe Principal A reiterated.

Leaders in the Distant Rural District described feeling more challenged than leaders in the Fringe Rural District by having limited access to non-financial resources and having to wear
“multiple hats.” The Distant BOCES Professional Learning Specialist explained this is a challenge across all their component rural school districts in the region. “Each year, we’ve seen that districts do struggle, especially our rural districts who have limited district office staff,” the Distant BOCES Professional Learning Specialist explained. “They are so overwhelmed with so many different roles that they have to play” that at the BOCES-level, “we definitely have realized the need for the support. That they don’t have the capacity to lead the work – and no fault of their own. There’s so many competing priorities.”

The Distant Superintendent agreed that a leading challenge in their district was managing many competing priorities with a small administrative staff. “When we talk about a professional development plan, you’re really only talking about the principal and the director of special education that can contribute,” the Distant Superintendent explained:

I think a lot of times the State Education Department comes out with things that they think would be beneficial, however, they don’t consider the resources that a school district has…the human capital that would be required to put together such plans. Whereas in bigger districts, when you have assistant superintendents for curriculum instruction, you have directors, you have department chairs – all those people can have time in their schedule where they can work on such a plan. When you’re talking a small rural district, we don’t have any of those resources.

It “just adds more to our plates of what we have to do on a daily basis,” the Distant Superintendent continued. In writing the plans, “you try to involve the staff” but “one thing that people don’t realize…a lot of times in rural districts especially at the secondary-level, my secondary teachers teach 5 or 6 different courses” so their plates are just as full.
The Distant Superintendent added that “there’s a lot of time constraints” with providing professional development opportunities in their district and “trying to find subs to do something during the school day is not really feasible.” The Distant BOCES Professional Learning Specialist agreed, explaining: “So, you’re the building principal. You’re out. That means the superintendent is in charge” of the building, “doing discipline and meeting with kids” while the principal is away. “That’s unique to a rural situation. That’s not typical in an urban setting.” The Distant BOCES Professional Learning Specialist explained that leaders in rural districts wear so many hats that “being out of school for one day, they cross their fingers that the school literally isn’t going to burn to the ground.”

More similar to the Distant Rural District, leaders in the Remote Rural District described experiencing challenges implementing professional learning requirements and providing opportunities because of their small administrative staff and limited access to non-financial resources. The Remote Superintendent explained:

We tend to do a lot of professional development within our building, instead of being able to send our teachers out to really great experiences as well as bringing in really talented professionals to work with our teachers. So, it does tend to fall on the principal a lot and that’s unfortunate because I think there’s so many opportunities out there that our teachers could benefit from. But in a small rural school, it just doesn’t happen.

Like the Distant Rural District, the Remote BOE Member expressed the challenges of sending leaders to training opportunities with only two administrators in a single building district. “If it was a training that both administrators are going to need to attend, then there’s a problem,” the Remote BOE Member explained:
For larger school districts that might have, in the building, multiple administrators – again, we’re a K-12 district, all of our administrators are in one building. Whereas a large district whether it’s a superintendent, there might be an assistant superintendent or two, and there might be a principal for each building, and there might be assistant principals, etc. It’s easier to send people off to training.

The Remote Superintendent explained that collecting the necessary data required by policy to drive the development of professional learning plans is another big ask of their district: “I’m probably going to sound like I whine a lot, but very rural school district related, we just don’t have the staff to be able to do a lot of that good data collecting.” The Remote Superintendent continued: “Like in your larger districts, you have assistant superintendents, and you might even have coaches that work with teachers in a coaching role” and other staff where “they’re the ones that collect that data as part of their position.” With only two administrators to do the work, leaders in the Remote Rural District explained that they can meet the minimum requirements, but many practices are not able to be done well because of limited district capacity.

B. Differences in Policy Implementation

1. Capacity – Financial Challenges in Implementation

A key difference in the capacity of rural school districts was the financial challenges each district faced in implementing the Professional Learning policy. The costs associated with professional learning were recognized by state-level interviewees as a significant challenge statewide and district-level interviewees each expressed similar sentiments about the financial costs of providing professional development. However, the financial challenges experienced by each rural school district varied in implementing the Professional Learning policy.
As discussed above, the Fringe Rural District received additional funding for being designated a TD. “There’s a lot of negatives with being on an ESSA list, but one of the positives has been the money that we receive,” Fringe Principal A explained. The Fringe Superintendent added: “There’s only certain things you can use the money for, which turns into professional development.” The Fringe Rural District appears to have been in a good position to buy the necessary time with the additional funding and other supports. “Yes, I think we had the resources. Yes, we designated the time to do it,” the Fringe Superintendent explained, adding that some of it is also BOCES aid-able and “every cent we can get back helps.”

The Distant Rural District similarly appears to have found a way to buy the time for implementing the Professional Learning policy, but with more of a focus described on finding the funding within the district’s available resources. The Distant Director explained that a lot of the challenges associated with the quality of professional development in a district “has to do with limited resources.” In the Distant Rural District, leaders described a dedication to finding the financial resources needed and ensuring that the time and money is secured to provide professional learning within their district. “We set time aside and funds aside for teachers to do professional development,” the Distant Superintendent explained, including exploring the use of grants and other funding to support professional learning needs. With these efforts, financial challenges do not appear to have been experienced in the Distant Rural District.

Unlike the other districts, leaders in the Remote Rural District described significant financial challenges. “We, as a district, we struggle financially,” the Remote BOE Member explained. “When we say our budget is tight, it’s not said casually.” Leaders in the Remote Rural District described feeling particularly limited by their district’s budget in pursuing professional development opportunities. “Unfortunately, in small rural districts,” the Remote
Superintendent explained, “professional development is one of the things that falls to the wayside because of budget.” The Remote Superintendent explained that policies like the Professional Learning policy “have a great outcome if you’re able to get there – and we want to be able to” but the financial cost introduces a significant barrier in their district.

“When they write policies, I feel like they write them for the largest district out there,” the Remote Superintendent explained:

I think they need to put the rural school hat on and realize our constraints and what we are and aren’t able to do, and then write policies specific to that. Or, again, provide us with funding because if we had the funding, we would absolutely do it.

More so than the other districts, the Remote BOE Member emphasized: “We don’t have as much money put aside for that, dedicated to” professional learning. However, our “budget hasn’t stopped us from providing professional development opportunities for teachers and administrators,” including purchasing many services from BOCES. “The administration worked very hard to find professional development opportunities that are low-cost or no-cost” to meet the standards as best we can within our budget, the Remote BOE Member explained.

Student Data Privacy

A. Similarities in Policy Implementation

1. Will – Initial Reactions

A key similarity in the will of rural school districts to implement the Student Data Privacy policy was the reactions of district leaders to the requirements of the policy. While all leaders interviewed expressed some degree of acceptance for the broader need of increasing data privacy and security practices in their districts, each leader described being overwhelmed by the requirements.
“Outside of reining things in, I think it was just a disconnect” between State expectations and district operations, the Fringe Superintendent explained. In the Fringe Rural District, leaders explained that the purpose of the Student Data Privacy policy made sense, but the requirements were frustrating. “When you get those policies,” the Fringe Superintendent explained, “they send you some ridiculously long guidance document saying here’s all the things that you need to be able to do” to comply with the policy. “It’s very nerve wracking. I probably swore a lot behind closed doors” with my leadership team because “it’s a pain in the ass,” the Fringe Superintendent emphasized. Fringe Principal A explained that these initial reactions to the Student Data Privacy policy have continued nearly one year after the regulations were enacted: “It was just a source of frustration, and still is” especially with the remote instruction needs introduced by the COVID-19 pandemic. However, the Fringe Superintendent explained that eventually “I said, okay, well, this is what it is, so how do we answer those questions?” Because “it’s important, and I see the importance of it. But they’ve definitely made it a little bit more challenging for schools.”

Like the Fringe Rural District, leaders in the Distant Rural District were frustrated by how the Student Data Privacy policy was presented to districts to implement. The Distant Superintendent explained:

It’d be great if they could just, at the state-level, figure out what they’re doing because I think sometimes, they rush things, and they don’t think about the entire plan completely. And then they continue to modify it, which just causes…more stress on school districts to make the changes that are necessary. It’s like, why couldn’t they have come out with all these things at the start? Who is behind the policy? Who’s thinking of these things?
Because…some of the things that are changing should have already been thought about in advance.

“It’s difficult,” the Distant Director added. “It has created inefficiencies… It’s made it a little bit more difficult, and it has definitely added to people’s plates.” Similar to the other districts, leaders in the Distant Rural District emphasized that they understood the purpose of the policy but described feeling frustrated by the policy requirements and experiencing, so far, that the mandates have been “too much to expect” from their district. “We’re definitely looking for more support,” the Distant Superintendent explained, adding that many of the policy requirements appeared to make more sense as state-level, rather than district-level, responsibilities.

Leaders in the Remote Rural District described feeling less frustrated by the Student Data Privacy policy compared to the other districts, but more reliant on their local BOCES to help them. “Because it was such a large beast and I ended up being appointed as the compliance officer, I just tried to take everything we had and put it through BOCES because then I knew that we were safe,” the Remote Superintendent explained:

I understand the need. But… I took this policy to be more of: Oh, I better make sure that we’re doing this correctly. Because this had so many other layers and pieces to it and so much more potential for lawsuit for our district.

More so than the other districts, leaders in the Remote Rural District described not perceiving any real need for it in their district. “I don’t know that it was something that really saved us a ton of trouble,” the Remote Superintendent explained, “but maybe down the line it would have.”

Sometimes I feel that these policies come out from bad things happening…but a lot of those larger school districts that have so much opportunity for either hackers or people to get information that they don’t need to have – we weren’t having any of those issues.
The Remote BOE Member added that BOCES helped a lot with meeting the policy’s requirements, but that “as a district we’re in good shape.”

2. **Capacity – Challenges in Implementation: Building Practices**

A key similarity in the capacity of rural school districts to implement the Student Data Privacy policy was the challenges they described experiencing in building new practices. From the district-level to the BOCES- and RIC-levels, all interviewees explained that the Student Data Privacy policy required new resources, practices, and overall changes to daily operations that have been challenging for leaders to pursue. “It’s caused a shift in the way districts buy software,” the Remote RIC Representative explained. “Many of them are now going into the BOCES and the RICs rather than going direct to the vendor, so they don’t have to do the work around the contract” and that shift has filtered all the way down to classroom practices. Overall, district, BOCES, and RIC interviewees similarly explained that the policy requirements were “huge,” especially for rural school districts.

Leaders in the Fringe Rural District explained that Student Data Privacy did introduce some benefits to their district, but not without many challenges. “A positive that came out of this is it made us…review everything that we’re doing to stay in compliance,” the Fringe Superintendent explained: “We had some people doing some real dumb shit,” so it provided an opportunity to gain a better understanding of what was going on in the classrooms. “It made me focus on what every single person was doing.” The Fringe Director added: “The policy itself…is not the difficult part. It’s the implementation…and making sure that parents understand and that teachers understand.”

It’s hard. It’s extremely hard. It’s frustrating… It seems like every time we kind of come up with a system or approach and we think: Oh, we’ve covered all of our bases so
that we’re able to do x, y, and z. Then something else pops up and you’re like: Oh no!

We can’t do this anymore.

Fringe Principal C explained: “We started to educate teachers on this and faculty members because they were doing a lot of things that were in violation of 121 because they’ve been doing it forever.” However, teachers felt like we were “tying their hands behind their back,” Fringe Principal A explained. Fringe Principal B added:

Staff, they kind of kicked and screamed on their way through. We understand it… as administrators, but I think the biggest thing that they had to realize is, we’re protecting you also. We’re protecting your teachers from lawsuits, potentially, and from getting yourselves in trouble.

“We did have a data breach in our county system” in a building located just off district grounds, Fringe Principal B continued. The local example made it “easy to kind of pigeonhole back and say: Hey, look what happened in our county building. We’re trying to make sure this doesn’t happen in our school building as well.”

Leaders in the Distant Rural District likewise described challenging experiences implementing the new practices required. “It really impacted people’s ability to efficiently kind of requisition and acquire new software,” the Distant Director explained. “Which isn’t necessarily a bad thing, because you really should be thoughtful about any technology that you add to your infrastructure,” but “it has added more work.” As discussed above, the Distant Superintendent described the policy’s requirements as “overbearing” because of the district’s smaller-sized administrative staff and the cost of building the new practices. “It’s kind of like another unfunded mandate,” the Distant Superintendent explained. “Because to do this, it’s
going to cost you more money. Yet, there’s nothing in place where the State is giving you more money to do these things.”

“We participate in BOCES,” the Distant Superintendent continued. “BOCES has a lot of good information coming out. I think BOCES is always trying to look at the needs of the district and how they can meet their needs.” However, while district interviewees explained turning to their local BOCES to alleviate some of the challenges they were experiencing in policy implementation, the BOCES and RIC representatives interviewed for this study each similarly described challenging experiences with the Student Data Privacy policy implementation. The Distant BOCES Data Privacy Representative explained:

My initial reaction was the feeling that this could be very overwhelming. We purchase a lot of software for districts and use a lot of software internally, and I was concerned about software that we’re using that we don’t even really know about – a teacher downloading something and using it. And trying to do that whole discovery. It did seem like this is really going to be a heavy lift here.

“We’re going one step at a time,” the Distant BOCES Data Privacy Representative continued. “It is really overwhelming. I feel like we’re only like one third through it and there’s so many other parts of it” that are only just getting started. “We’ll be able to do all that and be compliant, I know we will,” the Distant BOCES Data Privacy Representative added, “but it’s just a lot it really is.”

The Remote RIC Representative explained that some of the main challenges in building new practices and supports for districts with Student Data Privacy is working within the policy’s requirements: “We’re creating the materials to support the districts, but we can only create them within the confines of the law.” At the RIC-level, the Remote RIC Representative explained
“we’ve spent a lot of energy in developing all these materials” but “it’s a tremendous, tremendous undertaking for a district.”

Their frustration is: why can’t you people do this? They don’t understand why we can’t do it and I keep saying back to them: It’s not that we can’t do it. We physically could do it. It’s just that legally we can’t do it.

Similar to the experiences of district leaders, BOCES and RIC representatives described feeling challenged by the process of developing and implementing new resources and practices.

Like the Fringe Rural District, the Remote Principal described the implementation of the Student Data Privacy policy as an opportunity to rein in the staff and review what was being used in each classroom. “I think it heightened awareness on the part of teachers about what’s okay and what’s not okay,” the Remote Principal explained, but “it limited them a little bit in terms of their exploration of new technologies” as well. Leaders in the Remote Rural District described relying on their local BOCES more so than the other two districts to alleviate some of the challenges in meeting the new requirements. The Remote Principal explained that “kind of the onus of responsibility” fell to BOCES, which houses their student management systems. The Remote Superintendent added: “I think we’re making it work. Are we doing the best job we possibly could? No.”

I am feeling like I’m just meeting the minimum requirements so that I make sure that we are not putting ourselves in a litigious situation. I don’t know that I am so well-versed on the policy that I’m doing absolutely everything that I could. That was my intention, as this started, was to be so well-versed, but it’s just kind of gone on the back burner.

Similar to the experiences of leaders in the other districts, the Remote Superintendent described experiencing challenges in policy implementation because of the number of new practices that
had to be developed and instituted that competed with other priorities, especially during the COVID-19 pandemic.

3. **Capacity – Challenges in Implementation: Non-Financial Resources**

Another key similarity in the capacity of rural school districts to implement the Student Data Privacy policy were the challenges related to time, human capital, and other non-financial resources experienced. NYSED developed its own data privacy policy and data protection agreement that was posted for districts to use as a template, but the NYSED Data Privacy Official explained that the hope at the state-level is that districts are working with their BOCES “because that’s where the expertise would lie” and where districts could “share resources and save some money.”

At the district-level, each interviewee similarly described challenges related to time and human capital in the implementation of the Student Data Privacy policy. In the Fringe Rural District, “everyone’s already got double-titles,” the Fringe Superintendent explained: “I’m our district data privacy person and my exact reaction was: Holy shit, I got another title I got to have.” Unlike the other districts, the Fringe Rural District did have some in-house expertise to support policy implementation. Fringe Principal B explained that one of the district’s leaders “is a former police officer. So, from the beginning I think we’ve been ahead of this game” because our colleague “digested most of this for us.” The Fringe Rural District appears to have benefited from having a larger administrative staff with some in-house expertise on privacy and security compared to the other districts which, as discussed below, enabled the Fringe Rural District to rely less on their local BOCES for support.

However, the Fringe SBO explained that time became more of an issue for the leaders involved with policy implementation. “They put a lot of time and energy into it” which created
additional challenges because it “takes your focus away from other things.” Despite having some in-house expertise on broader issues of security and privacy, leaders in the Fringe Rural District explained that they did not have in-house specialization in cybersecurity and that finding the time to understand the policy requirements was a greater challenge. The Fringe Superintendent explained:

The amount of reading you have to do on top of everything else that they’re requiring us to do has been a little difficult. I’m not a techy, so I gotta get on the phone with somebody who knows what the hell these things mean and say: Can you break this thing down like you’re explaining it to my 5-year-old?”

“Not having someone specialized in it makes it tough,” the Fringe Superintendent added. But “it’s all relative” because “in a larger district, you have more people, more staff, you have to worry about more students” so the challenges are different. “It’s just, again, small district,” so “it’s like who’s going to do this one?”

Leaders in the Distant Rural District described feeling more constrained by their non-financial resources than the Fringe Rural District, but similarly challenged by access to human capital and time. “We’re having a hard time doing this because it’s really left up to me,” the Distant Superintendent explained. “I have no one else I can assign to this.”

For big districts, it’s great because they usually have a Director of Technology and that Director of Technology usually has other people that work for them. So, they have a plethora of resources. And if they also have directors for each of the content areas, they can help out as well. So larger districts have a lot of resources to get this work done, whereas a small district doesn’t.
Similar to the Fringe Superintendent, the Distant Superintendent likewise explained not wanting to put the Student Data Privacy responsibilities on another member of their leadership team: “In a small district, it’s falling squarely on me.”

The Distant BOCES Data Privacy Representative added that, regionally, their rural component districts overall appear to be struggling more with policy implementation because of the time and personnel required:

Sometimes you can see…that [rural district leaders] do feel a little frustrated; that they’re trying to work all this in. So, it is kind of harder. Where some of our other, bigger districts someone can devote that time. They can have that; take that on. Because there’s other personnel that can handle other things. But the smaller schools, they seem to struggle a little more.

Rural district leaders have “been thrown this as well,” the Distant BOCES Data Privacy Representative continued, and “they’re like: Hey, I already have a full-time job, and then they really feel overwhelmed that this has been put on them.”

Like the Fringe Rural District, the Distant Superintendent explained that, in the absence of having a staff member specialized in cybersecurity or data and technology, finding the time to understand the policy requirements is an even greater challenge. The BOCES and RIC One resources are “beneficial if you have the time,” the Distant Superintendent explained. “That’s the one thing that we don’t have is that time to dedicate to doing this other thing” and digesting all of the guidance and materials. “I like working 12-hour days, I don’t want to extend them to 16-hour days,” the Distant Superintendent emphasized.

Like the other districts, Student Data Privacy responsibilities fell to the superintendent in the Remote Rural District, who explained:
It’s just another hat that I end up wearing. So, I get when you have a technology coordinator or a Technology Department – we have a part-time tech person that comes in three days a week to help us. So, if we were a larger district, we would be able to have had some more staff to help us with this. And when I say I went to BOCES it was because I knew they were doing the compliance end of it.

As discussed above, the Remote Superintendent described needing to become “well-versed” in the policy requirements; however, finding the time to do so appears to have been a significant challenge in the Remote Rural District. “This was just another one of those things that we had to do compliance-wise and with no additional staff being able to be added,” the Remote Superintendent continued, and so many other things “take precedence over this right now.”

At the RIC-level, the Remote RIC Representative explained that RIC has devoted a lot of time to creating crosswalks and other resources for districts, such as a tool that will help districts do a formative assessment. “If they work with the Regional Information Center or in some cases their BOCES, that’s how they would learn about this information, unless they Googled it and found it themselves,” the Remote RIC Representative explained. The level of support then depends on the level of service that they have at their local RIC, which may be part of a base service or an add-on service that’s fee-based for subscribed districts.

However, while the RIC devotes the time and human capital to create the resources for districts to use, the work of implementing still falls to district leaders. All we can do is “provide materials and guidance for districts in order to help them understand what needs to be done,” the Remote RIC Representative explained. “We’re trying to make it easy for districts to do on their own, but there’s so much involved that a lot of them really need some kind of support as well.”
My next step after doing this work is meeting with our network manager to say: Okay, let’s now do a crosswalk to say of all of these NIST controls, how many of them are being done for the districts by the RIC, and how many of these things does the district need to be responsible for themselves? And that’s a huge, huge task, and that’s something we’re just scratching the surface on starting.

“Yes, they’re overwhelmed and they’re getting no financial support,” the Remote RIC Representative continued, and in rural districts “you may have a superintendent who’s also the high school principal because some of them are very, very small. And who is going to do all this work?” These strains on non-financial resources available were emphasized by all leaders across all districts and the BOCES and RIC as a leading challenge in implementing the Student Data Privacy policy.

B. Differences in Policy Implementation

1. Capacity – Eases of Implementation: Reliance on BOCES and RIC

A key difference in the capacity of rural school districts to implement the Student Data Privacy policy is the extent to which each district relied on their local BOCES or RIC to ease the implementation process. The RICs are “the primary lead in this and our BOCES is really secondary to what they’re doing,” the Distant BOCES Data Privacy Representative explained. The Remote RIC Representative explained that in the years since the law was enacted and regulations proposed, RIC services related to data privacy and security have grown to include an expansive list of resources and materials for districts, some that are free as dictated by regulation and some that are fee-based. All of the resources created by the RIC are designed to ease the process of policy implementation for local districts, including a comprehensive planning guide that covers all nine policy requirements. The Remote RIC Representative reiterated that the
RICs “have a lot of information and documentation that’s available to districts, that they can use on their own.”

Districts, however, typically go to their local BOCES first to get a sense of direction, according to the Distant BOCES Data Privacy Representative. “With a BOCES, you have what you use internally for your programs, and then you also have what you sell to districts,” the Distant BOCES Data Privacy Representative explained:

The way that we help the districts is if they purchase through us, it’s on us to work with the companies, get the documents signed, get it posted on the district’s website and our website that the company is compliant and following all the rules and regulations in regard to data security.

“We help them along with sample contracts” as well, the Distant BOCES Data Privacy Representative continued, and publish an inventory tool online. Both the BOCES and RIC interviewees in this study explained that one of the largest services that has transpired from the Student Data Privacy policy’s implementation are contract consortiums that have “negotiated the terms of Ed Law 2-d requirements into the contracts for the third party vendors,” the Remote RIC Representative explained:

[If a vendor] has a contract through the contract consortium, they are agreeing to all the terms of Ed Law 2-d, and then districts can buy software through their BOCES or their RIC and the districts doesn’t have to do the Ed Law 2-d work because it was already done on behalf of them by the contract consortiums.

These are only some of the resources and services that BOCES and RICs have developed and provided to local districts to support their implementation of the Student Data Privacy policy.
In the Fringe Rural District, the Fringe Superintendent explained that it was more cost-effective in their district to add Student Data Privacy to the responsibilities of one of the leaders and keep the implementation in-house. “BOCES wanted us to buy into a service that would help cover us with some of this, but it wasn’t financially sound for us to do that,” the Fringe Superintendent explained. So, “I got one person doing two jobs instead of an additional $90,000 cost to the district.” Unlike the other districts, the Fringe Rural District did not appear to rely on their local BOCES or RIC to support the implementation of the Student Data Privacy policy and were able to save money by keeping the implementation in-house.

Leaders in the Distant Rural District, in contrast, relied on their local BOCES to an extent. The Distant Superintendent explained:

For the most part, one of the things that we try to do is any kind of software that we’re purchasing, we try to go through BOCES because BOCES will already have contracts with the various vendors. The other part is going through and knowing every single application that I’m using, every single program that I’m using – I’m not able to do that. That’s where I would need more support and that’s where I try to count on BOCES.

Unlike the Fringe Rural District, the Distant Rural District did not appear to have sufficient in-house capacity to take on the full responsibility of implementing the Student Data Privacy policy requirements and had to turn to their local BOCES for the extra support.

In the Remote Rural District, leaders described an almost full reliance on BOCES supports to implement Student Data Privacy. As discussed above, the Remote Superintendent explained that BOCES was instrumental to their district and provided peace of mind by taking over most of the responsibility to be compliant. “If there was software that they absolutely had to have but BOCES didn’t offer, then obviously we made sure that it was compliant,” the
Remote Superintendent explained, but “I tried to hand everything over to BOCES” because there was more certainty that the district would be protected. More so than the other districts, the Remote Rural District appears to have relied on the local BOCES to manage the implementation of Student Data Privacy requirements and ensure that their district was in compliance.

School Safety Plans

A. Similarities in Policy Implementation


A key similarity in the capacity of rural school districts were the existing practices within the districts that eased the implementation of the School Safety Plans policy. Interviewees in each district explained that school safety practices were already in place in their district prior to policy adoption, which made it easier for the leaders to implement the policy’s requirements and be fully compliant.

In the Fringe Rural District, Fringe Principal A explained that a few years ago, “we went through an overhaul of [school safety] and so we didn’t start from scratch.” Instead, “we continue to take any new guidance and we just massage the one that we have.” Fringe Principal B added that “there was a big culture shift that we had to make. For example, we would have practices out back, sports practices, and coaches would just prop the doors open,” which violated school safety requirements. However, these issues were already being addressed in the district by the time the most recent amendments to the policy were adopted, so “we were ahead of the game.”

“Honestly, our safety plan’s evolving I’d say by the day,” Fringe Principal C explained, describing at length that safety considerations were constantly being accounted for within the day-to-day operations of the district. “There’s bigger pieces of our safety plan,” like door-
hardening and cameras, “right down to the little things that we do that are technically in the
safety plan all day long,” such as “keeping kids away from the curb” by drawing a line around
the building for them to follow. They may seem like little things, but “the totality of them, when
you put it all together, it definitely helps a lot,” Fringe Principal C explained. “It’s not false
advertising” because “if people see all of these little, microscopic type of safety things, it makes
them feel like there is a safe environment here.” Like the other districts, leaders in the Fringe
Rural District described a commitment to ensuring that school safety practices were in place and
constantly being reinforced in their district.

Similar to the Fringe Rural District, leaders in the Distant Rural District explained that
many of the safety practices required by the School Safety Plans policy were implemented in
their district prior to the recent amendments to the policy. “We were already doing these things,”
the Distant Superintendent explained:

Being in a rural community, probably one of the benefits of being in a small community,
we have two sheriff deputies that live five minutes from the school. They have kids that
go to school here, some have graduated from school here. So, they know the building.
“At least once a month, if not twice a month, the New York State Troopers will actually stop by
the school to do a walk through,” the Distant Superintendent added. Despite not having the in-
house expertise found in the Fringe Rural District, leaders in the Distant Rural District described
a close relationship with local law enforcement that eased the implementation of the School
Safety Plans policy, largely because the relationships were already in place.

Leaders in the Remote Rural District likewise explained that many safety practices were
already in place in their district long before the policy was adopted. The Remote Superintendent
believed that the State was late in adopting and amending the regulations related to School
Safety Plans. “I was doing lock-down drills before we had to do lock-down drills,” the Remote Superintendent explained. The Remote Principal added:

Our director of buildings and grounds is responsible for setting up all of our fire drills and evacuation drills and lockdowns. We discuss those at cabinet…we keep track of those.

We’re prepared for them. We have formal plans in place.

The Remote Superintendent explained that school safety was “part of my platform” for my superintendency, after “being a principal for seven years where I was the safety person. I was the one in charge of making sure we had adequate lock-downs and getting the police involved.”

Like the other districts, the value placed on school safety practices by district leaders appears to have eased the process of policy implementation in the Remote Rural District.

2. Capacity – Limited Challenges in Implementation

A second key similarity in the capacity of rural school districts to implement the School Safety Plans policy were the limited challenges experienced in each district. At the district-level, each interviewee similarly described that using their existing resources to implement the School Safety Plans policy introduced more minor frustrations than real challenges, especially in terms of the amount of time implementation required.

In the Fringe Rural District, leaders described needing to “tap our own resources” to implement the School Safety Plans policy (Fringe Principal B). As discussed above, the Fringe Rural District had some in-house expertise to rely on and Fringe Principal B explained that “our superintendent had connections with experts in the field to consult and help” as well, which the Fringe Superintendent described as a vital resource. However, the Fringe Director explained that time was an important, limited resource in policy implementation: “We basically analyzed building by building by building” in plan development, which took a good amount of time. “We
used the resources we had, which is difficult,” the Fringe SBO added: “It would have been nice if we could have afforded to hire some experts and some consultants to help us put together the most efficient plans. But… we don’t have the resources to do that.”

Like the other districts, leaders in the Fringe Rural District described using their existing resources and working with their staff as presenting some hurdles, but not significant challenges in implementing the School Safety Plans policy in their district. “Money wasn’t a big deal because doing what’s right sometimes costs money. And in this case, that’s exactly what it did. It also costs a lot of time,” the Fringe Superintendent explained, but “the one hurdle in this whole thing” was “having to explain to staff: I can’t tell every single one of you every detail of the plan.” Fringe Principal A explained that staff would ask: “What do we do, what do we do? And it’s like, well, we can tell you some things, but we can’t tell you everything… That’s a little unsettling” for them at first. “I want to say 60% of my staff graduated in the county,” the Fringe Superintendent explained: It’s a “trusting community, we all know each other” and “for a lot of staff, initially, it was hard for them to understand why” this information wouldn’t be shared with them.

More so than the Fringe Rural District, dedicating the time to fulfill the requirements was described as a greater frustration with policy implementation in the Distant Rural District. The Distant Superintendent explained:

The interesting part is that the template that you use to complete the plan is not the same template that you have to fill out on the State Ed website. So, you kind of have to morph between the two, which is frustrating. And it’s like, every year we have to submit this. So, you would think that if…you’re submitting it every year that a lot of the information could be pre-populated when you go to submit it. However, it’s not.
“When you don’t have the human capital to do all these things, it’s just another burden that you could be doing something else with that time,” the Distant Superintendent continued.

“Keeping them updated is, I would say, a key part of that being an effective policy,” the Distant Director added. However, keeping the plans updated requires time and personnel. “I could imagine, if you didn’t have a service,” like the ones offered through BOCES, “that might kind of fall off your radar and before you know it, the specific people and roles and responsibilities and contact information changes. And if you don’t keep that updated,” when the time comes to use it, “you have the breakdown that’s inevitable if you haven’t really put the time into planning.” Similar to the other districts, leaders in the Distant Rural District described using their existing resources in policy implementation as raising more frustrations and concerns than actual challenges in terms of their district’s capacity.

Like the other districts, leaders in the Remote Rural District described a mostly smooth process of policy implementation. The Remote Superintendent explained:

We buy into a service…a safety resource at BOCES, that does like our lead testing and does our building plans. But they also do anything having to do with our safety plan. So, that’s just one of those things we purchased.

“But, again, we were already doing these things,” the Remote Superintendent reiterated. However, similar to the other districts, leaders in the Remote Rural District described some frustrations with the policy, mostly tied to their smaller staff. “I think that if you look at that safety policy and you look at what some of the requirements are,” the Remote Superintendent explained, “having that School Resource Officer would be so helpful,” but the additional cost for that position isn’t within our budget.
More so than the other leaders in the district, the Remote BOE Member expressed concerns that the human capital involved in meeting these requirements “is something a lot of people don’t consider. And I don’t think State Ed gives a lot of thought to that.” When it comes to finding the resources to implement policies, “how that happens is not something they’re concerned with – and I understand that. How every district is going to do it is not their concern.” But it takes a lot of time, the Remote BOE Member continued, and that has a cost.

B. Differences in Policy Implementation

1. Will – Perceived Need

A key difference in the will of rural school districts in implementation was the perceived need for the School Safety Plans policy in their districts. In each district, leaders appeared to believe that having school safety plans is important for all districts, and each interviewee likewise described already having most of the practices in place prior to the regulations. Where they differed was in whether they believed having a state policy requirement was necessary for their district specifically.

In the Fringe Rural District, leaders described the School Safety Plans policy as a great requirement that has been valuable for their district. The Fringe Superintendent explained: At first, “that was one where initially I’m like, this is gonna be a pain in the ass. But I’m so glad we did it” because “it’s put so many people’s minds at ease.” Leaders in the Fringe Rural District explained that the threat of school violence might not be as high in their district and community, but the need for having safety plans in place still exists. The Fringe Superintendent explained: “We’ve had a kid try to shoot another student, you got a gas leak, got a pandemic, we’ve had power outages, we’ve had countless lock-ins, lock-outs, lock-downs, shelter in places” and “a
couple years ago, someone dropped a mysterious package” between our buildings. “We’re not exempt from violence occurring here,” the Fringe Director explained:

But, if you look at the amount of violence in our community, it’s lower, comparatively, to if you’re looking at an inner city school in Chicago where you’re probably going to be looking at more violence, so that’s something you consider.

The flexibility of the policy was then beneficial because it allowed us to “tailor our plan” to the needs of our district. “It’s absolutely a valuable thing,” the Fringe Director explained. “It’s a living document” that is constantly evolving in our district. “Probably the best thing the State’s ever made us do,” the Fringe Superintendent added.

Leaders in the Distant Rural District shared similar sentiments about the value of school safety plans, primarily from the peace of mind they afford to students, parents, and staff. The Distant Director explained:

People don’t realize, building principals have an immense amount of responsibility on them. And always in the back of your mind is: Is something like that going to happen at my school? And am I going to handle it properly, or is this going to be the black spot on my career? And is something terrible going to happen under my watch? I mean that kind of everyday, crushing responsibility that you feel.

“This is an area where I think most of us found some comfort knowing that the State and the federal government were putting a level of importance on it,” the Distant Director continued.

However, unlike the other districts, the Distant Superintendent described the state mandate for school safety plans as an unnecessary requirement for their district. “Another waste of time,” the Distant Superintendent explained:
It’s like you’re jumping through hoops to meet what the State wants in a plan and, once again, it’s general. There’s not a lot of structure to the plan, you don’t know if you’re answering the questions correctly or not.

“I think it was just requiring us to put it on paper,” the Distant Superintendent continued, “which is frustrating.” The Distant Superintendent explained that this frustration came from previous experiences of feeling as though the time devoted to writing down the district’s practices and submitting this information is just a formality for the State to “check off” that does not ultimately help their district. With School Safety Plans, the Distant Superintendent described being hopeful after receiving some feedback from the State with these plans but believed that the state mandate “was unnecessary.”

More similar to the Fringe Rural District, leaders in the Remote Rural District described the School Safety Plans policy as a great requirement that targeted a need in their district. The Remote Superintendent explained:

That’s something that’s really important to me, so I absolutely support that. I think they’re necessary; I think it was something that was lacking in our schools – that we were doing drills, but not the right kind of drills. And I think that liaison relationship with State Police and local police wasn’t happening in most schools.

However, more so than the other districts, leaders in the Remote Rural District believed the State was “late” in the mandate because their district had already made school safety a priority before the policy was adopted. Unlike the Distant Rural District, the Remote Superintendent believed that there was a need for NYSED to mandate school safety plans and the practices required by the policy: “It was one of those things that I was like: Well, good. It’s about time they’re making us do this because it should have been happening already.”
III. Research Question #3: Perceptions of Needs, Interests, and Capacity

My final research question was: What are key similarities and differences in the perceptions of New York State education officials and rural school district leaders regarding the alignment of these policies with the needs, interests, and capacity of rural school districts? The findings for my third research question will be presented by (a) similarities and (b) differences in the perceptions of state-level interviewees and district-level interviewees of the needs, interests, and capacity of rural school districts.

A. Similarities in Perceptions

1. Limited Rural Voice in Policymaking

A key similarity in the perceptions of state-level interviewees and district-level interviewees was the limited representation of rural voice each interviewee perceived exists in policy development. All district-level interviewees believed that a rural voice from a district like theirs was not being included in state education policymaking. “I think they represent the issues that are facing the largest school districts and not rural school districts.” Fringe Principal A explained:

If our county, to some extent if our BOCES, had an issue on something with a state policy and we started rattling sabers to get things changed, I think it would be much more challenging than if Rochester did, or Buffalo did, or Albany did, or…certainly if New York City does.

“We’re not of any political value,” the Distant Superintendent emphasized, and “we’re not the priority,” the Remote Principal similarly explained: “We don’t have enough people to have teeth, so we’re pretty quiet.”
Across all three districts, interviewees described a shared perception that rural school districts like theirs are underrepresented as stakeholders in policy development. “I would be very surprised if, when they developed the policy, if they brought in anybody from a rural school district to help, advisor kind of process, or even just give input,” the Remote BOE Member commented. Fringe Principal A explained:

Once I got a list from the State…if there were 20 names, two of them might be what you would consider to be rural school districts… [The others are] not rural in my mind. They’re suburban… I look at that and I chuck it to the other side of my desk, and I go: They don’t know about us. They’re not representing us… They don’t have our full voice.

The Fringe Superintendent explained that rural representation in state education policymaking may be achieved through larger organizations, such as the Rural Schools Association (RSA). In the Remote Rural District, leaders likewise cited the RSA as the organization that often serves as the rural voice at the state-level. However, the Remote Superintendent expressed concerns with the representativeness of RSA for New York’s rural school districts, explaining:

I know that we have a Rural Schools Association and they do represent us, but even they sometimes don’t have all the pictures and they’ve been out of the district for so long that…it’s not relevant to them anymore.

The Remote Superintendent added that state officials should seek direct input from current teachers and leaders in rural schools.

Similarly, state-level interviewees described little rural representation in their experiences. The NYSED officials each shared the belief that feedback and concerns from rural school districts would find their way to NYSED’s attention through public comment periods, open forums, surveys, or through BOCES, RICs, RSA, and other organizations, discussed below.
NYSED officials described limited, if any, rural representation and voice in policy development for the four policies in this study.

Regarding Meal Shaming, the state-level interviewees explained that state guidance and support in policy implementation “was pretty consistent across all the districts” (NYSED Meal Shaming Official A). Regent B explained that differences across districts were considered in discussions of meal charges in relation to diversity in socio-economic status among student populations. In the more rural schools, Regent B explained that a higher percentage of students often receive free and reduced lunch, so meal shaming was less of an issue. Economically-disadvantaged students in schools with predominantly wealthier populations, in contrast, could face greater hardships receiving free and reduced lunch because they would “stick out more” in the school lunch line.

However, the state-level interviewees explained that these considerations did not enter into the design of the policy or how NYSED provides guidance or oversight. “People can divide school districts in New York State numerous ways,” NYSED Meal Shaming Official A explained: “You can go urban, rural. You can go by size of school district; you can go by need of school districts.” With Meal Shaming, “I don’t think we evaluate things necessarily by rural versus urban.”

Regent B explained that, with Professional Learning, the different needs of rural school districts were discussed in relation to the policy requirements. For example, “you really have to pay attention to what funding is available,” Regent B explained:

Rural schools often get caught at the short-end. Transportation is significantly more expensive because you’ve got great expanses and areas. You have to look at the cost of
presenting a workshop and whether or not you reimburse people for their mileage and food, and if it’s overnight or not.

The NYSED Professional Learning Official explained that “we did have representation from some rural school districts” on the Professional Learning Team and that conversations in policy development did raise concerns about differences of place:

The other thing that came up in conversation with stakeholders was, we talk about equity for students. Equitable access to effective educators. But the thing that came up…is the PD that a teacher gets in Scarsdale is very different from the PD that a teacher gets in New York City, or somewhere in western New York.21

While differences related to place may have been discussed, those considerations were not incorporated into the policy design. “When you read the plan requirements of the professional learning standards,” the NYSED Professional Learning Official explained, “they don’t speak super specifically to the needs of rural educators. The language is more general.”

With Student Data Privacy, “in the year since the regs have been in effect, I don’t think we’ve looked particularly…at the category of a small rural school,” the NYSED Data Privacy Official explained. “We realize that the bigger districts…probably have more access to more resources than smaller districts or rural districts.” The selection of the NIST cybersecurity framework appears to have been partially driven by this acknowledgement. “The reason why I picked this standard in particular was because it’s one of those standards that is flexible,” the NYSED Data Privacy Official explained. However, the NYSED Data Privacy Official did not believe that rural school district leaders or representatives from the RSA were included in the development of the Student Data Privacy policy.

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21 The list of Professional Learning Team members published by NYSED does not include any school district that would have been considered rural based on the classification system used in this study (D’Agati 2019-January).
School Safety Plans similarly was described as taking a blanket approach to all districts. “We currently are actively meeting with the yet again reconvened task force” and “there is a representative from the Rural Schools Association as part of that. So, I guess that would be the opportunity to share specific concerns,” NYSED School Safety Official A explained. “But aside from that, I guess everybody gets an equal chance.” On the matter of rural representation in state education policymaking, perceptions of state-level interviewees mostly aligned with those of district-level interviewees.

2. Improving Policymaking through Collaboration

A second key similarity among state-level interviewees and district-level interviewees pertains to their recommendations for improving the policy process. All interviewees identified additional funding as a leading need. Moreover, they agreed that increased collaboration among stakeholders could improve rural representation. “I feel like the State sometimes forgets that New York State…is really varied,” the Fringe SBO explained:

We have New York City, which is very urban and very densely populated and has very different needs in a lot of ways, although some of the same need, but they’re very different school districts from something like [my district] which is very rural, very sparsely populated.

“I think they don’t often take that into account when they make some of the decisions they make” at the state-level, the Fringe SBO continued. Fringe Principal C added: “There’s a lot of good ideas coming out of NYSED, I’m not faulting them... I just think it’s challenging,” but “maybe if NYSED had the opportunity to go visit districts more, that’s how you get a true representation or a true understanding of what’s going on.”
Distant Rural District leaders similarly asserted that increased representation from and outreach to rural stakeholders could improve policymaking. “There are many unique characteristics about a rural school that many times get overlooked when they are coming out with these policies,” the Distant Superintendent explained. “Having that voice of how [a policy] is going to impact rural schools is very important.” The Remote BOE Member echoed the same sentiment, explaining that “it’s important to make sure that stakeholders are at the table… from all different interest areas.”

Whenever State Ed is looking at a policy and putting together a committee, they should make sure that they have at least one representative from a small rural area involved in that committee so that those small rural schools have a voice.

“Even if it’s not something they’re putting together a committee for,” NYSED should ensure that “at least they’re asking the question” of how the requirements will impact different districts, the Remote BOE Member added.

State-level interviewees likewise expressed the need for increased stakeholder engagement in policymaking. With the four policies in this study, NYSED officials and Board of Regents members each described the importance of collaboration in implementation, as highlighted in the findings for my first and second research questions. Regent A explained: “Sometimes people that don’t deal with education every day think they have the answers, but they don’t have a clue what the real issues are.”

We’re doing some good things, but we’ve got an awful lot to keep working on… What’s going to be…very important is to hear the input before we make the decision about what do we do about the school year…testing, [etc.]. How do other people that are dealing
with it upfront, how do they feel about it? And we have some good, solid conversations before we make any changes.

“Money and power are the two greatest challenges in education,” Regent B added: “If you have your professional educators as the integral part of the decision-making, you will find that you have greater success because they get to have a voice in there.” Like the district-level interviewees, the Regents and NYSED officials interviewed said that collaboration with in-school stakeholders was important for effective state education policymaking.

B. Differences in Perceptions

1. Representing Rural Interests

A key difference in the perceptions of state-level interviewees and district-level interviewees were the beliefs of why rural representation may be lacking in policymaking. District-level interviewees overall shared the perception that their concerns as rural school leaders were not understood or given attention at the state-level. “I tend to believe that every single decision gets based off of New York City,” the Fringe Superintendent explained:

I hate to say this, but…they don’t give a shit about upstate New York and they don’t give a shit about our district. The only reason these policies and procedures are designed is because something bad happened down in New York City, Long Island, or Westchester County – whatever county downstate.

“It’s all a reaction to what’s going on downstate,” the Fringe Superintendent continued. For example, “we must have put, conservatively, twenty graduation plans in place last year” with COVID. “I just laughed because all these superintendents are losing shit over it, and I’m like: Guys, all you gotta do is wait for one Long Island school district to sue the State and we’ll be
able to have graduation…and that’s exactly what happened.” Fringe Principal A shared a similar story, explaining:

For years, if there was a snow day in January during Regents, it was always: Well, kids are out of luck, take it again in June. Two years ago, we have a snow day all throughout the state and where the entire state was impacted, including New York City. Now all of a sudden you can move the Regents exams.

Honestly, I have an “extreme bias,” Fringe Principal A continued:

I know a lot of policies and programs are targeted toward New York City and the Big Five. I live with it. I’ve lived through that stigma my whole life. So, I do feel we are underrepresented at times and it’s probably because of sheer numbers. Anything coming out of State Ed is going to impact six areas disproportionate to the rest of New York State.

“We’re making every decision based off of them,” the Fringe Superintendent reiterated, which is a perception that each district-level interviewee expressed and appears to have led to a shared belief that their concerns were not being seriously considered by state policymakers.

The Distant Superintendent believed that state education policies and initiatives “most often do not” address the needs and interests of rural school districts because most NYSED officials do not understand rural areas. The Distant Superintendent explained: “Most of the people that are being appointed to New York State Education Department usually come from city school districts, urban districts. So, they’re not really able to relate to what happens in a rural school.” Because of the perceived place-based identities of NYSED officials, the Distant Superintendent expressed the belief that rural school districts are ignored in state education policymaking. “It’s disheartening,” the Distant Superintendent explained:
I want them to pay more attention to rural school districts, because that’s the only way we can provide the equity for our children. If they continue to ignore us – which they have been – we’re not going to be able to have an equitable education for the kids that go through a rural school.

At a state gathering, a congressman said: “There’s an inherent bias toward urban areas. And I couldn’t agree with him more,” the Distant Superintendent continued. “Because when you think about a lot of the policies that come out, they’re geared toward urban areas or geared toward places that have larger populations – never geared toward small rural districts.”

Other district-level interviewees likewise described the perception that they were not being heard at the state-level, even when NYSED seeks feedback from districts and the public.

“What they do is they send out the communication saying: Hey, it’s the…open time to comment on these things,” the Fringe Superintendent explained, but “they already have their mind made up” and “they’re just gonna find the data or the comments to justify what they’re doing.” Fringe Principal C added that, at the district-level, there is little clarity as to what happens when they do participate in some of the State’s outreach:

Sometimes when you get stuff from NYSED you’re like: Okay, is this going to apply to us anyway? In the long run, are they just going to make the decisions for us? How does this work? And you do feel sometimes when you feel stuff out from NYSED or whomever it might be, how is my voice going to be represented? If I’m trying to advocate what’s best for my district and my students, where does that go after I say it or after I fill out a survey from the State?

The Remote Principal explained that often teachers and administrators are not willing to engage because “people kind of feel like, even with the input, the State does what the State wants to do.”
Like the Distant Superintendent, the Remote Superintendent emphasized that “there’s so much more politically tied to a lot of these decisions that are directly related to big schools, because that’s where I think they feel like their constituency lies.” Similar to the other leaders, the Remote Superintendent continued to explain that as a rural school leader, there appears to be an expectation of accepting that the needs and interests of larger districts and city schools will be prioritized. “That’s the name of the game, unfortunately, but it’s also something that we’ve accepted, and we understand that sometimes we just kind of get pulled along and we gotta do what we gotta do.”

Unlike district-level interviewees, state-level interviewees believed that the concerns of rural leaders were being heard at the state-level and addressed if needed. Regent A explained that “if somebody on the Board of Regents speaks up and says how did we cover such and such when it pertains to rural school districts,” then “someone who was on the committee that was dealing with whatever the issue was would respond to that.”

When the hair stands up on the back of my neck and I see something and I say this isn’t fair, and if there’s a place to say it and to hope that you might get some positive reaction, then I feel it’s my responsibility to speak up.

“That doesn’t mean anything’s going to happen.” The receptivity of the concerns ultimately “depends on who’s sitting in the chairs,” Regent A clarified. “If you go to other parts of the state where it’s more urban, suburban, would they be concerned about rural school problems? No, they got their own.” In fact, “they wouldn’t speak to it unless they had children that were involved themselves, which would be sort of unlikely,” Regent A explained:

I think there are legislators, I think there are some Regents members that become more aware of upstate New York – that it doesn’t end at Poughkeepsie. Which is so important
because they have no idea what a challenge it is to put things together and cover everything for a rural school.

“I think there’s certainly plenty of time and room for those kinds of discussions,” Regent A emphasized.

As mentioned above, state-level interviewees believed that rural voice found its way into the policymaking process through organizations in a position to represent the needs and interests of rural school districts. The NYSED Data Privacy Official explained that the general belief was that the rural voice was conveyed by at least one of the organizations typically included as a stakeholder, or that a rural representative would find a way to share feedback. With Student Data Privacy, “I did do a tour around the state,” the NYSED Data Privacy Official explained, and the hope was that a rural representative attended at least one event. They’re “in a unique position and so is their feedback… So that’s a good point to make sure that those stakeholders are factored in even more.”

Similar to Student Data Privacy, state-level interviewees for School Safety Plans expressed the general belief that any specific needs or interests of rural school districts would find their way into the development process through other stakeholders. “The Commissioner does meet with the BOCES [District Superintendent’s] every month and part of that is they’ll add specific items to the agenda that they want either to be briefed on or raise questions that they want to discuss,” NYSED School Safety Official A explained. “I feel like that’s also probably an opportunity for issues of rural school districts to be raised.” Overall, the state-level interviewees, unlike the district-level interviewees, expressed the perception that rural needs and interests were being represented to enough of an extent that any significant issue or challenge, as perceived by state-level officials, were being accounted for in policy development.
2. **Equity: Addressing Rural Needs**

A second key difference in the perceptions of state-level interviewees and district-level interviewees was whether interviewees believed state education policymaking was addressing the needs of rural school districts. “There are many rural school districts in the state,” the Remote BOE Member explained, “but it seems that most state education policies seem to have been developed with large urban districts as the beneficiary of those policies.” District-level interviewees overall described the reflection of their needs and interest in state education policy as a bigger issue of equity. The Distant Superintendent explained:

They keep talking about equity. However, when they talk about equity, they always talk about equity for brown and black students… This is where I think the disconnect is: It’s not about brown and black students. It’s about students that live in poverty or students that are poor. When you talk about equity, it always comes down to students that are poor. They lack the equity.

“Rural poverty is very different from urban poverty,” the Remote BOE Member added. For example, “if you’re in an urban area and you don’t have any money and you’re looking for a job… there’s a bus system that can take you to your job interviews” and back home. “If you live in a rural area,” you need a car. “You want to have a job opportunity, but you don’t have a car, what do you do?” These different needs are why rural poverty is different.

Other district-level interviewees appeared to share this position and continued to describe how the needs and interest of their rural school districts centered around what they perceived to be inequitable funding, access, and human capital capacity. “I do not always believe that NYSED understands our district needs and interests,” the Fringe Director explained:
Rural schools often get overlooked by the Big 5 and NYC. They come out with initiatives for rural schools, but there are often so many strings attached that it is not feasible for a small district to meet all the mandates.

In each district, leaders shared similar frustrations related to funding and limited access to resources and opportunities in their districts. For example, interviewees in each district described challenges with internet access for their students that have come to the forefront during the COVID-19 pandemic. “I love hearing: Well, you got to make sure every kid has access to a device,” the Fringe Superintendent explained. “Well, great… We have places in our community [where] there’s no cellphone service.”

How in one breath can you say everybody should have access to a device when we got hotspots last year and they didn’t work! We sent them home with kids, they did not work. Because there is no cellphone service at all.

The Distant Superintendent echoed the Fringe Superintendent’s frustration, sharing the same experience in the Distant Rural District. In the Remote Rural District, the Remote Principal similarly explained how, with the recent COVID-19 task force, state officials “wanted to know what the barriers were in districts.”

But some of the real barriers for us as a school district are that, living in such a rural area, our kids don’t have internet. I’m not finding the State very helpful in terms of those barriers for us.

“So, I think that sometimes when the State gets that information or that feedback from people, it might feel like they’re not responsive, especially to smaller rural schools,” the Remote Principal continued, because the rural-specific barriers are not the ones that are prioritized.
Each district-level interviewee went on to similarly express the perception of state officials lacking understanding or empathy for their concerns about equitable access in rural school districts. The Fringe Superintendent described NYSED officials as being “out of touch” with district practices and shared an experience with a NYSED official who “critiqued us for not having a certified science teacher.”

I offered someone $80,000 to come teach junior high science for us. Couldn’t get them… I was violating my Teacher’s Association contract seven ways from Sunday, but I couldn’t get someone to come for $80,000. The starting salary here is $45,000, this person… should be making maybe $60,000 for us. I offered $20,000 more than they would have made per contract. Couldn’t get them. What’d [NYSED] say to me? Well, that’s your problem.

“You have to understand how we are if you want me to improve,” Fringe Principal A added. “You want me to improve junior high ELA – we have one junior high ELA teacher. So, you’re going to talk about how we’re going to change a department – I don’t need to change the department. I need to change one person.” Through these examples, leaders in the Fringe Rural District expressed a high-level of frustration with what they perceived to be a misunderstanding and neglect of their local needs by state officials.

The Remote Superintendent explained that “unless you’ve experienced it, it doesn’t even come into your thinking.”

I think that’s a key thing, because even when we hire people and you say to a teacher: ‘So, you’re probably going to have six different preps in your day.’ And they’re like: ‘What!’ Because most of them did their student teaching in a large school where the
teacher only teaches 9th grade Global – they don’t teach 6th grade through 12th grade social studies six times a day.

For me, “it’s about equity not only in policymaking, but it’s also about equity in: A New York State student should be a New York State student no matter what town you live in or what school district you go to,” the Remote Superintendent continued. However, similar to the perceptions of the other district leaders, the Remote Superintendent shared the belief that the State “very rarely” considers these challenges.

The Distant Superintendent explained how when bringing the issue up for discussion with state officials, the response district leaders typically receive is “what are you going to do about it as a superintendent?” which is frustrating. “It’s a State failure,” the Distant Superintendent believed: “If the State Education Department wants to talk about true equity, then they need to look at equity across the board… whether or not students in all areas of the state are getting an equitable education.” For example:

A few years ago, the Chancellor for the New York City schools was at a superintendents conference up in Saratoga, and she was talking about a $33 million art program that they were putting in place for the kids in New York City. And my response… I would love to have some of that money because I can’t afford to hire a family and consumer science teacher.

District-level interviewees emphasized that these examples show how recognizing the needs and interests of rural schools in policy design is part of a larger question of equity.

Unlike the district-level interviewees, the Board of Regents interviewees believed that state education policymaking, overall, incorporated a clear focus on improving equity for all types of districts. “When you’re in a small rural district and somebody says: Well, this won’t
cost you much. Well, costing much if they’re broke – how does that compute?” Regent A commented. “We have to figure out how to get some kind of equity,” Regent B explained:

That goes for funding, that goes for staffing, that goes for curriculum. And that’s one of the big issues right now is how do we do equitable access to digital, equitable access to content, and how do we assess the needs of these students.

“We shouldn’t have the haves and have-nots,” Regent B emphasized, which includes striving for equitable access for rural students and districts.

As discussed above, the NYSED interviewees described limited rural representation in policy development for the four policies; however, none of the state-level interviewees expressed a perception that the needs and interests of rural school districts were not being considered or addressed. Regent B described the differing opportunities, access, and funding considered in policymaking at length, explaining how people living in rural areas have different interests and face different needs. For example, “we have no subways in [town] and the buses aren’t so great,” because “they go by the rural schools, but only twice a day.” So, if you’re a new teacher at a rural school who needs to take public transportation because you’re not from the area, “you have to come and leave at the time the buses go by.”

Regent B added that transportation issues such as these are tied to “geographic isolation” that further reduces access to opportunities for rural students. Regent A explained that, with COVID-19 for example, “all of a sudden, kids need all these devices. Do you think in rural areas they naturally had all that? No. They don’t even have the broadband that they need to operate everything, so talk about trying to catch up.” In rural places, alternative options are not always available Regent B added, and they usually have a cost associated with them. Similar to the needs that district-level interviewees expressed, the Board of Regents members perceived
funding to be a main source of challenges in providing equitable access and opportunities in rural school districts. “Teachers need support,” Regent B explained. But “somebody who’s very experienced doesn’t want to go to a rural community where they’re not being compensated equitably.” Through these examples, the Regents members interviewed described an awareness and consideration of rural needs and interests in their experience in state education policymaking.

Unlike the Board of Regents interviewees, the NYSED interviewees did not emphasize equity for rural schools in discussing the four policies. However, the NYSED Data Privacy Official shared experiences visiting New York City schools during a tour of the state and highlighted the opportunities available to New York City students, recalling:

New York City has some really cool schools. There’s a school for people who are being trained to be aircraft handlers and technical people, and you go in and there’s a big plane sticking out of the building, like the fuselage of part of a plane. And there’s a fashion institute for high school students that want to go into the fashion industry, and they have all these mannequins with the designs some students have made… It was really fun going to all these places for these meetings. In another school that was just beautiful they have these like Tiffany gorgeous lamps in this beautiful auditorium that look like something you would see… in Europe. It was just gorgeous… New York City has some really great locations.

The NYSED Data Privacy Official did not appear to consider the equity of these opportunities for New York City students compared to rural school students, as the Distant Superintendent had raised. Instead, NYSED interviewees overall appeared to share the perception that the four policies broadly addressed the needs and interests of all types of districts. For example, with
Meal Shaming, the NYSED officials believed that the adoption and implementation of a meal shaming policy at the local-level was an easy request of schools and districts because of a perceived shared value in the purpose of the policy. NYSED Meal Shaming Official B explained:

I think that rural districts, just as much as urban districts, see a great value in the child nutrition programs. These are very important programs, they provide a huge service for the children in their school, so they’re valued. These are valued programs to them.

Interviewees expressed similar sentiments that the purposes of the four policies targeted shared needs among all districts.

Beyond the broader purposes of the four policies, the NYSED interviewees explained that rural school district concerns appear to have been considered, but needs specific to rural school districts were not typically identified. With Professional Learning, the NYSED Professional Learning Official explained at length:

The biggest thing we heard when we spoke with teachers and administrators from rural areas was again about access to opportunities and providers of professional development. Oftentimes, when you’re in the New York City region or Westchester or even up here in the Capital Region, there are a lot of organizations and…you have access to a lot of different kinds of professional learning. One of the things that we did hear from the rural districts was they were pretty much getting their professional development from their district or from their local BOCES… They didn’t have sort of outside experts coming in as much to provide them with PD. And so, we didn’t necessarily see that as a problem. “A lot of our BOCES deliver high quality professional development,” the NYSED Professional Learning Official continued, reiterating that NYSED’s position was that as long as the
professional learning is data-driven and evidence-based, limiting opportunities to those provided in-house or by BOCES was viewed as acceptable.

Student Data Privacy and School Safety Plans interviewees differed slightly from other NYSED interviewees regarding consideration of rural needs in the policy process. As discussed above, the NYSED Data Privacy Official was the only state-level interviewee to share an uncertainty as to whether rural stakeholders were represented in policy development and express a belief that NYSED should ensure their representation in the future. With School Safety Plans, NYSED recently sent out a survey following their first training as part of the grant awarded. When explaining the purpose of the survey feedback, NYSED School Safety Official A recalled that “a requirement of the grant is that we’re paying particular attention to the needs of rural districts. So that might be one thing we might want to redo that survey for” as the trainings continue. This new requirement with NYSED’s grant appears to be the only direct consideration of rural school districts required in the design or subsequent state guidance among the policies sampled.

3. **Limited Local Capacity**

A final key difference in the perceptions of state-level interviewees and district-level interviewees was whether they believed state education policymaking was addressing the concerns of rural school districts. All interviewees described questions of state guidance and district capacity as part of a larger conversation of having local control but needing to meet state mandates with limited local resources. The Remote RIC Representative explained:

I think a lot of times when we approach State Ed with certain questions, what their response back is: New York State is a local decision-making state, so therefore you need to make these decisions on a local basis and State Ed is not going to tell you what to do.
We will tell you what needs to be done, but how you go about doing it is your own choice.

“That’s the frustrating part,” the Remote RIC Representative continued, “because there are some things that, if they were done on a state basis, would be easier for districts. But then State Ed says: But then, now you’re losing your local control. So, that’s kind of the balancing act.”

District-level interviewees shared the perception that this balancing act often feels more difficult in their rural districts because of their limited capacity and resources when “the mandates aren’t getting any less” (Distant Director). “NYS has so many policies that it makes it difficult for small districts who do not have the personnel to dedicate their time to just NYSED needs,” the Fringe Director explained. In the Fringe Rural District, district leaders described how their designation as a target district exemplified the challenges their district faced to comply with state requirements with the constraints of their local resources. “We were a target district…because of our Special Ed,” the Fringe Superintendent explained:

When we met with the State, I’m like: Hey, listen, I can’t get Special Ed teachers. Like I can’t recruit them out [here]. And they said to us: That’s not our problem, it’s your problem. But while you’re telling me I need to do these things – I don’t have the bodies to do it!

“The woman that they sent out here, she was an asshole,” the Fringe Superintendent continued. “I had one Special Ed position I could not fill for 3 years. And she’s like: Well, you’re out of compliance… I know I’m out of compliance, what would you like me to do?”

Well, go out and find one. I looked at her… I said: Great, is there a fucking Special Ed tree outside my window I can cut someone off? Because if there’s not, I don’t know where the hell you want me to get this person.
Leaders in the Fringe Rural District highlighted experiences with state officials, such as these, as ongoing frustrations when complying with state education mandates in their district.

With each new mandate that comes down from NYSED, the district-level interviewees described the perception that the additional responsibilities often feel like a heavier burden for the smaller administrative staff of rural districts like theirs, as opposed to larger districts. Leaders of all three districts similarly explained that they believed state officials have no understanding of the daily operations and human capital in a rural school district. The Fringe Superintendent shared meeting the Commissioner of Education with other superintendents across the state: “We’re talking about APPR and she’s like: Well, why don’t you have your assistant superintendents help with APPR?”

Someone was ballsy enough to say to her: How many of us do you think have assistant superintendents? She goes: How many of you do? If there was 25 people in the room, two people raised their hands. And she’s like: I had no idea. Exactly. So, don’t think just because of what New York City has or in this case Albany or Rochester or Syracuse has, doesn’t mean that’s what 95% of the state has.

The Fringe Superintendent’s frustrations were echoed by other district-level interviewees who overall expressed the perception that state officials were unaware of the challenges their districts’ limited resources and access, and geographic isolation, presented for complying with state mandates. “I think when you come from a big city environment… you have all these resources,” the Distant Superintendent explained. “A lot of times, when these mandates come down from State Education, they really don’t consider the impact on rural districts.”

The district-level interviewees likewise shared the perception that the guidance and supports provided by NYSED are designed for districts that have a larger administrative staff.
with someone who can spare the time to review the information. “I am registered to receive those emails from the State,” but “engaging with those emails is not something I necessarily have time to do at any deep level,” the Remote Principal explained, because usually “if you click on the link for the support, it’s still not direct” which is just more time-consuming. “With rural administrators, it’s just different,” Fringe Principal C explained. “We’re wearing a multitude of hats every single day” and are “constantly running from fire to fire” throughout the day, so “it’s like, where am I ever going to find the time?”

Unlike the district-level interviewees, the state-level interviewees described a more disassociated stance toward policymaking and shared expectations that rural school districts would find the resources to comply with state mandates. “It was really surprising to me” that districts and communities “think that… we run the schools, instead of the school having local control,” NYSED School Safety Official B explained. “That’s like a huge misunderstanding on the part of the people.” Districts “don’t see the state agencies as helpers,” NYSED School Safety Official A added.

State-level interviewees overall described NYSED as being “hands off” in much of the policy process and serving primarily as a source of guidance. “We do a Regent’s proposal on the budget, but we don’t have any authorization to make it happen,” Regent A explained:

A lot of things that we do, the Regents, we make some recommendations or decisions that we want to pursue something to large group. Then we gather input, we then put it out for public reaction… The Board of Regents is the overseers, but State Education Department are the worker bees. And so, then they present us a compilation of what was gathered, and we take a look at that and see if it warrants some adjustments.
“If there’s a question or it doesn’t meet it comes to the Board of approval, but I personally don’t go through them all,” Regent B added.

Similar to the other state-level interviewees, Regent A described the perception that, when it comes to implementing policy requirements, “there’s various ways to approach it” that district leaders can explore. Regent B explained that “rural schools have to decide how to take their limited resources and parameters and make a decision,” adding that district leaders can connect with regional supports:

Rural schools, most of them are in a BOCES, and they meet at one of the BOCES centers and people are invited within their district and also in the neighboring districts. So, you get an exchange and interchange, and they can help each other.

“You don’t always have to go someplace” for professional development, for example, Regent A explained. “Sometimes you bring somebody in, and you share that person through a BOCES or something to do things for the various districts” and those approaches can work just as well to meet the needs of the students and teachers by sharing resources.

Among state-level interviewees, each similarly expressed the perception that rural school districts, like other school districts in the state, would determine how to comply with policy requirements locally and, if the districts were lacking resources or capacity, the leaders would find a way to acquire what was needed. The NYSED Data Privacy Official explained that with Student Data Privacy requirements, for example, most rural school districts “will probably have to contract it out or use a BOCES.”

I think if you’re the superintendent and you’re also the school principal…and you’re also the School Resource Officer and Technology Officer, you may not know how to even begin to look at it. And I’m not a cybersecurity professional… even though my work
overlaps and overflows into cybersecurity, when it comes to the actual technical aspects of it, I get experts to help. District leaders “are in the same position,” the NYSED Data Privacy Official continued: “You have to go and find the expertise if you don’t have it in-house.”

State-level interviewees explained that additional guidance is where the role of NYSED comes in for supporting schools and districts. NYSED School Safety Official A explained:

I think, by and large, rural school districts are probably… always the most appreciative for any direct technical assistance that they receive. Their resources are more scarce, and…they are wearing many more hats then, in some cases, the larger suburban school district superintendent has to. They don’t have the budget to have full-time staff tasked with many of the things that they have to take on their own.

Overall, the state-level interviewees shared an acknowledgement that rural school districts typically had fewer resources and capacity, and often sought more support from NYSED in their experiences, but that local control meant that these districts had to figure out how to meet policy requirements through local decisions about how to allocate their existing resources and capacity.

IV. Summary of Findings and Analysis

Research Question #1: Policy Design

The findings presented for my first research question show that there were more similarities than differences in the design of the policies sampled for this study. All four policies were similarly designed to provide peace of mind to stakeholders within the district and community on broader topics of social and emotional well-being, educator effectiveness, and controlling for physical and virtual risk. Interviewees in this study agreed that all four policies were based in good ideas that provided a transparency to district positions on the issues which
helped support teachers and leaders in daily operations. Further, all four policies appear to have been developed in response to larger, national issues that gave a semblance of “top-down” mandates to district-level interviewees.

The four policies each were designed to similarly rely on schools and districts using their existing resources and with a clear adherence to local control. None of the policies were tied to financial or other resources, apart from NYSED guidance. Financially, state-level interviewees were sympathetic to funding concerns but expressed how providing such was outside their control, leaving the appearance that financial needs were not a leading consideration in policy development. However, as discussed with my second research question, financial costs were not significant in the implementation of these four policies according to district-level interviewees, apart from the costs tied to pursuing optional best practices, such as hiring SROs. Rather, non-financial resources were more significant in policy implementation, namely time and human capital. State-level interviewees shared little recollection of considering the extent of non-financial resource needs for schools and districts in policy design, though district-level interviewees expressed that complying with state mandates that rely on existing resources introduces larger issues of equity for districts with limited local capacity, discussed with my third research question.

The extent of stakeholder engagement in policy development differed across the four policies sampled, both in terms of the use of workgroups, task forces, or related, and in the engagement with the public in open comment periods. With Meal Shaming, state-level interviewees described the policy as a directive from the Governor. During the public comment period, concerns were raised by stakeholders regarding the potential financial impact of this policy; however, NYSED officials responded by reiterating that the regulations were designed to
conform with statute. The public comment period for Student Data Privacy was most similar to that of Meal Shaming, with NYSED officials’ responses to stakeholder feedback mostly reiterating alignment of the regulations with education law and only addressing technical language in order to better conform with statute. Student Data Privacy was described as having early stakeholder engagement with task forces and public forums.

With Professional Learning, in contrast, the engagement from stakeholders during the public comment period was described as playing a significant role in policy development, with multiple public comment periods opened over several months that resulted in revisions to the regulation. The policy itself was described as developed with a focus on ensuring stakeholder engagement, including embedded continued stakeholder engagement at the district-level in the policy’s design. Continued stakeholder engagement at the district-level was likewise embedded into the design of the School Safety Plans policy; however, the public comment period for School Safety Plans solicited no stakeholder feedback with the recent amendments. Unlike the other policies, School Safety Plans was developed as a multi-agency initiative.

Research Question #2: Policy Implementation

Will of Rural School Districts

The findings presented for my second research question show more similarities than differences in the will of rural school districts to implement the four policies. The will of the rural school districts was measured in terms of perceived need and initial reactions to the policies in implementation. No key differences in the will of the rural school districts to implement the Professional Learning and Student Data Privacy policies were found in this study.

District leaders interviewed in this study shared similar reactions to the perceived need of each policy in their schools. Overall, leaders were adamant that each policy was founded in a
good idea that they agreed was important and valued. However, all three superintendents interviewed emphasized that part of being a good leader meant that most of the requirements set forth by each policy were already in place and being practiced in the district. With this perception, the district leaders interviewed were hesitant to take a clear position on whether the policies were needed in their districts because they juggled believing in the value of the ideas with the question as to whether a state education mandate was necessary, or the issue was better left to true local control. District leaders interviewed all shared the perception that the state mandates were likely targeted at districts with poor leadership and often described the policies as having limited benefits to their schools because most practices were already in place.

The perceived need for Student Data Privacy was similar across districts but differed from the reactions leaders expressed toward the other policies. Like the other policies, district-level interviewees explained that they understood the value of the policy; however, all district leaders interviewed expressed significant frustration with this policy, which they believed to be overwhelming. Several district leaders expressed feeling as though many of the Student Data Privacy policy requirements should not be placed on the districts to meet and that the State should instead be playing a greater role in implementation of this policy.

School Safety Plans was the only policy in which perceptions of need differed across the districts. Again, district leaders described similar beliefs in the value of the policy and role of good leadership; however, leaders in the Fringe Rural District perceived a higher need for this policy in their district, leaders in the Distant Rural District felt that the state mandate was unnecessary, and leaders in the Remote Rural District described the state mandate as late because they had already prioritized the issue. This perception of “lateness” on the part of NYSED was
shared in the Fringe Rural District, where leaders had started an overhaul of their school safety plans prior to the regulations but still believed that the policy was necessary.

Unlike the other policies, leaders in each district described different reactions to the adoption of the Meal Shaming policy by their boards of education. Meal Shaming was the only policy in this study that appeared to have pushback from local boards of education in adoption because of concerns over the potential financial impact the policy could have on the collection of unpaid meal charges. These concerns appear to have been most significant in the Fringe Rural District but were likewise raised in the Remote Rural District. Overall, district-level interviewees described their schools as being left alone by the State in policy implementation, true to the state-level interviewees’ descriptions of adhering to local control in policy design. BOCES or RICs were noted as the primary source of support and guidance for the three districts, especially with Professional Learning and Student Data Privacy.

**Capacity of Rural School Districts**

The findings presented for my second research question also show many similarities in the capacity of the three rural school districts to implement the four policies. The capacity of rural school districts was measured by looking at existing district practices, financial, and non-financial resources, including human capital, time, access, and supports, that either eased policy implementation for the schools or made it more challenging.

Existing district practices eased the implementation of three of the four policies sampled, with Student Data Privacy being the exception, for the three rural school districts in this study. As discussed above, leaders across all districts explained that many policy requirements were practices that a good leader would already have in place, such as anti-meal shaming practices, long-term professional development plans, and collaboration with local law enforcement in
schools safety practices. Leaders in each district explained that implementing the Meal Shaming, Professional Learning, and School Safety Plans policies were mostly a matter of taking their existing practices and putting them on paper for NYSED to approve.

Unlike the other policies but still similar across districts, leaders in all three rural school districts described that the need to institute many new district practices was a key challenge in implementing the Student Data Privacy policy. District leaders interviewed in this study described the Student Data Privacy policy as overwhelming and its implementation taxing for their staff because the mandate was described as unavoidably falling to the superintendents in each district to lead, requiring a thorough review of all software being used in their districts, changing the district’s practices for purchasing software, and setting new expectations that solicited reactions of being overly restrictive for teachers exploring new technologies. Each district described turning to their local BOCES, discussed below, to alleviate some of the challenges with building these new practices. However, the BOCES and RIC representatives interviewed in this study similarly shared frustrations with policy implementation and a feeling of being overwhelmed by the Student Data Privacy policy requirements.

Non-financial needs were not described by any district leaders when discussing the Meal Shaming policy and leaders across each district likewise described experiencing few challenges implementing School Safety Plans, with time being the only resource that often felt limited with their small administrative staffs. However, non-financial resources were described by district leaders as a shared challenge in the implementation of the Professional Learning and Student Data Privacy policies. Leaders in all three rural school districts explained that having a smaller administrative staff reduced their in-house capacity to comply with policy mandates because the fewer administrators to share the work also meant less in-house expertise and less time to spare.
Across all districts, leaders often reiterated in the interviews that rural school leaders are constantly wearing “multiple hats” because there are fewer administrators to share the work. These “multiple hats” were described as referencing the need of administrators to take on responsibilities outside of their expertise and full-time position, mostly in order to comply with policy. With Professional Learning and Student Data Privacy, leaders across each district similarly explained that they did not have specialists in-house, such as department chairs or a director of technology, that only filled that single position and could therefore dedicate more time to writing plans and completing risk assessments. Leaders explained that policy implementation was often challenged by the number of hats each administrator was wearing because each additional responsibility reduced the amount of time the administrators could devote to fulfilling the responsibilities of their other roles.

Unlike the other policies, leaders across the three rural school districts described varying reliance on their local BOCES or RIC in the implementation of the Student Data Privacy policy as a key element in their local capacity. With the slightly larger administrative staff, leaders in the Fringe Rural District explained that they were able to save money by keeping implementation of the policy’s requirements mostly in-house. Leaders in the Distant Rural District, in contrast, described a balanced division of responsibilities between what they could accomplish in-house and what they needed to rely on their local BOCES to fulfill when their in-house capacity was exhausted. Unlike the other districts, leaders in the Remote Rural District explained turning to their local BOCES almost entirely because the policy’s requirements were described as too substantial to fulfill with only two administrators in the district.

Financial challenges were described by leaders across all three rural school districts with Meal Shaming and Professional Learning policies; however, these challenges differed across the
districts for both policies. The more remote the district, the more financial challenges were raised within the sample, with leaders in the Remote Rural District describing experiencing the greatest financial challenges across all policies. Despite the varying financial challenges experienced by the three districts in this study, all district-level interviewees similarly believed that financial resources were the primary need for their schools with the Meal Shaming policy to provide some form of reimbursement for the lost meal charges at the end of the year.

The most notable difference across districts were the resource and support needs district-level interviewees believed were necessary for their schools. Apart from the shared need for financial resources expressed with the Meal Shaming policy, leaders interviewed varied in what they believed their districts needed with the other policies. In the Fringe Rural District, a comparatively larger administrative staff appears to have allowed leaders to do more in-house and avoid the additional costs of contracting services. The Fringe Rural District was also the only Target District (TD) sampled in this study, which meant the district was receiving extra funding that reduced financial needs, specifically with professional development. With the Professional Learning, Student Data Privacy, and School Safety Plans policies, leaders in the Fringe Rural District were in overall agreement that their district needed more clarity from NYSED in the expectations for each policy but described increased state involvement as a “double-edged sword” they were not sure they wanted.

Leaders in the Distant Rural District, in contrast, were looking for more overall support for these policies. Distant Rural District leaders explained efforts to find the funding necessary to meet policy mandates in their district, but that more funding was needed if they were to meet more than the minimum requirements. With Professional Learning, leaders in the Distant Rural District described inequity associated with limited access to opportunities as well, and further
expressed beliefs that NYSED could do some of the “legwork” for many policies to help alleviate the human capital constraints for smaller rural school districts like theirs, especially with Student Data Privacy requirements. Like the Fringe Rural District, Distant Rural District leaders agreed that they needed more clarity from NYSED in the expectations for each policy.

Unlike the other districts, leaders in the Remote Rural District were in overall agreement that they would only want more funding for their district in order to meet more than the minimum policy requirements and be able to pursue best practices currently outside their budget. Similar to the Distant Rural District, leaders in the Remote Rural District believed that their district’s limited access to opportunities, especially with professional learning, was inequitable; however, the Remote Rural District appeared to turn to BOCES more than the other districts to alleviate some of the burdens experienced in complying with policy mandates with only two administrators. More so than the other districts, leaders in the Remote Rural District feared that increased state involvement in policy implementation would result in changing expectations that would only make implementation more challenging for their small staff.

Research Question #3: Perceptions of Needs, Interests, and Capacity

The findings presented for my third research question show more differences than similarities in state-level and district-level perceptions of rural school district needs, interests, and capacity. First, similar perceptions of a limited rural voice in state education policymaking were expressed by state-level and district-level interviewees. At the district-level, leaders across all three rural school districts perceived that rural concerns and interests were lacking in state initiatives and appeared to believe that state officials were not inclined to make direct efforts to consult rural leaders because smaller rural populations were of little political value.
The building principals, directors, school board members, and SBO interviewed in this study each explained that they were unaware of any outreach from NYSED to leaders in their or other rural districts but believed that if there was any consultation of rural school districts in policy development, then it would be with their superintendents. However, each superintendent interviewed explained that they were likewise unaware of any consultation of rural leaders but that maybe the conversations were through organizations such as RSA or limited to their BOCES District Superintendents. No RSA representatives or BOCES District Superintendents were interviewed for this study, though all district-level interviewees similarly believed that without directly engaging rural school district leaders, a true rural voice was not being captured in the policymaking process because these organizations were disconnected from the current daily operations of a rural school district.

State-level interviewees likewise described limited rural voice in their experiences with the policies sampled for this study, instead appearing to support the district leaders’ concerns that NYSED relied on RSA or BOCES to account for a rural voice in policymaking. NYSED officials interviewed described state education policymaking as taking a blanket approach to all districts and keeping the language general so that the policy could apply to any type of district. With the four policies sampled for this study, my interviews with NYSED officials revealed that there was either no rural representation in the development of these policies or that the interviewees believed there was an RSA member involved that could speak on behalf of rural interests. The NYSED Professional Learning Official was the only interviewee to explain that there were rural school district leaders on the Professional Learning Team, though the school districts represented would not have been considered rural based on the classification system used in this study.
Despite these shared perceptions of a limited rural voice in policymaking, state-level and
district-level interviewees differed in their perceptions of whether rural interests were being
represented in state education policies. Leaders across all three rural school districts strongly
believed that rural interests were not being represented in policymaking. While some leaders
described time constraints as often deterring them and their staffs from engaging with state
officials in public outreach periods, the more prominent perception expressed by all leaders was
that state officials neither understood nor placed any value on the interests of rural school
districts. With this perception, district-level interviewees explained that part of being a leader in
a rural school district was accepting that their districts would typically just be pulled along with
state policies and initiatives that target the interests of larger schools.

State-level interviewees, in contrast, believed that interests of rural school districts were
being accounted for in policymaking and shared the perception that rural concerns would make
their way to state-level attention through BOCES, RICs, RSA, or other organizations, as
discussed above. The Regents and NYSED officials interviewed for this study all similarly
expressed that BOCES and RSA, specifically, were in the best position to represent the interests
of rural school districts and raise any major concerns or issues that would then be addressed at
the state-level if needed. Only the NYSED Data Privacy Official explained that the development
of the Student Data Privacy policy may have lacked sufficient rural representation.

With this focus on voice and representation, both state-level and district-level
interviewees believed that policymaking would improve through increased collaboration among
stakeholders, and that more financial resources were needed to improve policy implementation.
District-level interviewees described challenges in pursuing best practices or increasing
opportunities without additional resources and that their budget constraints were a key source of
inequity in the educational experiences they were able to provide to their students. State-level interviewees likewise expressed how more funding was needed; however, state-level interviewees were more disheartened by the prospects of acquiring additional funding, which they described as a significant problem but one that was ultimately out of their control.

When discussing the needs and interests of rural school districts, most interviewees described some notions of equity; however, state-level and district-level interviewees differed in their perceptions of equity for rural school districts. District-level interviewees described their perception of inequity in rural school districts as tied to the higher cost of providing services in sparsely populated areas, where non-financial resources and access to services and opportunities were limited. Leaders in all three rural school districts expressed frustrations with their perceptions of NYSED’s attention to the barriers their districts faced, such as access to internet and recruitment of teachers, and shared similar stories of being advised by state officials that they needed to solve these issues locally, which they explained was not within their local capacity, discussed below. Overall, district-level interviewees perceived that the true needs of their rural districts were being ignored by state policymakers, which they described meant that they were unable to provide an equitable education to their students.

State-level interviewees, in contrast, shared the perception that the needs and interests of rural school districts were being considered in state education policymaking and that equitable education was a key focus of state leaders. With Meal Shaming and Student Data Privacy, the NYSED officials interviewed described the policy’s goals as shared values for all districts, and the NYSED School Safety Officials explained that NYSED’s new training requires that the needs and interests of rural school districts be addressed. With Professional Learning, the NYSED official interviewed shared that the limited opportunities for professional development
available to rural school districts was discussed in policy development, but ultimately considered a non-issue. The general perception expressed by all state-level interviewees was that the four policies addressed needs and interests they believed were shared by all types of districts.

Notions of equity were further tied to the final perception presented in these findings regarding the relationship between local control in policy design and local capacity in policy implementation. As discussed above, state-level interviewees emphasized that schools and districts were responsible for making the decisions of how to comply with policy requirements based on their local resources. However, district-level interviewees described challenges with implementing policy requirements and overcoming local barriers with their limited capacity. Leaders across all three rural school districts raised similar frustrations with state-level expectations, perceiving that state education policies were designed by state officials who assumed that all schools and districts had similar capacity to larger districts, such as having assistant superintendents or principals. The expectations then set forth by policy requirements were perceived as unfair to districts like theirs that had less local capacity to meet the state mandates.
List of Major Findings

**Research Question #1: Policy Design**

State officials report little consideration of non-financial resource needs for districts, specifically human capacity, in policy design.

State officials report that stakeholder engagement differs across policies in the NYS education policy design process.

**Research Question #2: Policy Implementation**

Rural school leaders believe that many state education policy requirements are designed for districts with poor leadership.

Rural school leaders report challenges in state education policy implementation due to having a smaller administrative staff to share the responsibilities and spare the time.

**Research Question #3: Perceptions of Needs, Interests, and Capacity**

State and rural officials have different perceptions regarding the role of rural school districts in the NYS education policy process.

State officials believe that stakeholder organizations, such as BOCES and RSA, ensure that the needs and interests of rural schools are being considered in policy design.

Rural school leaders report high levels of frustration with what they perceive to be a lack of concern for rural interests in the state education policy process.

Rural school leaders perceive a lack of consideration of local resource capacity in the policy process as a source of inequity for rural districts.
Chapter 5: Conclusions and Recommendations

The purposes of this study were to investigate state education policy design and policy implementation in NYS rural school districts. The research literature shows that important differences related to resources, services, educational trajectories, cultural and social opportunities, and educational opportunities are attributable to geographic place (Burkell & Saqinur 2015; Hillman 2016; Kryst, Kotok & Hagedorn 2018; Miller, Votruba-Drzal & Coley 2019; Rude & Miller 2018). In the policy process, tools and solutions are designed to align with dominant ideology (Asen 2010; Malen & Knapp 1997). Long-standing social constructions of the “Rural School Problem” in American education have supported a dominant, metro-centric ideology that positions rural schools as unable to meet the emerging needs of modern society (Danbom 1979; Grineski 2013; Sher 1977b; Steffes 2008; Stein 2004; Theobold & Wood 2010). Some scholars have found that contemporary federal and state education policies misunderstand the capacity of rural school districts (Eppley 2009; Johnson & Howley 2015). This study begins exploring whether state education policies are designed with metro-centric or urban-favored elements that may influence policy implementation and efficacy in rural school districts.

Major Findings

Significant findings from this study center around the capacity of rural school districts to implement policy requirements and the differing perceptions of state officials and district leaders regarding the role of rural school districts in the state education policy process. The literature reviewed in Chapter 2 discussed how policy tools and solutions are often designed to align with dominant urban norms, while differences in rural places are overlooked (Jakubowski 2019; Thomas et al. 2011). In education policymaking, rural schools face the greater disadvantage if policies are metro-centric (Fernandes & Neves 2010). The findings presented in this study lend
support to the presumption that state education policies may be designed with the resources and capacity of metropolitan schools in mind. Rural school district leaders described challenges in policy implementation because state expectations did not align with existing local capacity, specifically with the constraints of smaller administrative staffs to share responsibilities, provide expertise, and spare the time. State-level interviewees, in contrast, reported little consideration of the differing non-financial capacity of school districts in policy development, and emphasized that the allocation of responsibility and resources in implementation were decisions left for districts to determine locally. However, rural district leaders noted that their dependence on state funds shapes their will to comply with state mandates.

More similarities than differences were found in the design of the four policies, and more similarities than differences were found in the will and capacity of the three rural school districts to implement the policies. However, state officials and rural district leaders reported different perceptions regarding the role of rural school districts in the state education policy process. The literature reviewed in Chapter 2 explained that focusing on the big picture may prove to be counterproductive as district leaders are challenged to reconcile broader ideals with local realities (Kahne, O’Brien, Brown & Quinn 2001). State officials in this study reported the NYS education policy process as typically taking a blanket approach to all types of schools and districts; however, rural district leaders expressed significant frustration with state officials and perceptions of inequity in the policy process. For the district leaders in this study, the role of rural needs and interests in the policy process was viewed as part of a larger conversation about equity; however, the state officials in this study did not appear to share this perception. State officials instead believed efforts were made to have the voices of all stakeholders included in the policy process and perceived the policies to be valuable for all types of districts.
The findings of this study further suggest that a misunderstanding and neglect of rural needs and interests exists in NYS education policymaking. The Rural Opportunities Consortium of Idaho’s investigation of federal education policy, cited in Chapter 3, found that most education policies are not designed with rural schools in mind and that policymakers are not making efforts to understand the unique challenges of the rural place (Johnson, Mitchel & Rotherham 2014). A significant finding in this study was that stakeholder engagement varied across the four policies; however, even with the variation, little rural representation appears to have existed in policy development. State officials instead supported the perception shared by district leaders that stakeholder organizations are often the only source of rural representation in policymaking. Moreover, the district leaders in this study believed that the true needs of rural schools are not given serious attention at the state-level, instead perceiving that state officials do not see value in real rural interests in the policy process. These findings suggest that a lack of rural voice in policy development and limited consideration of the access school districts have to the human capital and expertise needed to implement policy mandates may contribute to metro-centric features of policy design.

Limitations

This study focuses on a small sample of rural school districts and education policies in NYS and does not represent a comprehensive study of the whole system. The small size of the study limits the generalizability of the findings; however, the limited sample allowed for more in-depth analysis and interviews with officials. With the smaller sample, I was able to probe for additional detail during the interviews that produced original insights from the officials and added fuller description to the key findings of this study. Despite limiting the generalizability of
these findings, richer data was collected with the smaller sample in this study than would have been obtained using survey research methods.

From the rural school districts sampled, only senior leadership were included in this study. The findings are limited in that they do not include the perceptions and experiences of teachers, students, parents, and other community members regarding these policies. The leaders available to be interviewed varied by district as did each interviewee’s knowledge and experiences with each policy. I was unable to interview school business officials or members of the school board of education in two of the three districts in this study. No school board presidents were available to be interviewed for this study and I was unable to interview the building principal in one of the districts. However, superintendents were interviewed from each of the three districts. The findings revealed that rural school superintendents are the district-level officials most informed about state education policy mandates and most aware of the entire process of implementation, including benefits, challenges, and district needs. This study’s focus on senior school leadership also revealed the unique dynamics of rural school leaders, including differing allocations of responsibility and challenges as they relate to the size of the district’s administration.

A minimum of one state official was interviewed for each policy, each with varying direct engagement in the design process. Many officials that held senior leadership positions during each policy’s development were not available to be interviewed because they have taken on new positions outside of NYSED in recent years. However, each official interviewed was knowledgeable about the history and purposes of the policies and are current leaders in their respective offices where they oversee district compliance with the policies, including providing guidance and support to schools. Despite the small sample of state-level officials in this study,
the findings revealed perceptions of rural schooling and the policy process distinct from those expressed by district-level interviewees, as well as differences between the perceptions of NYSED officials and Board of Regents members.

Recommendations for Policy and Leadership

The findings of this study support four recommendations for rural school district leaders, state education officials, and the NYS policy process:

1. **Engage the Rural Voice Directly**

First, all parties should increase efforts to include the rural voice in the education policy process. Improved representation could help address significant barriers in rural areas, share successful practices, and improve conversations on resource needs and district capacity. This study revealed that NYSED officials made limited efforts, if any, to engage rural stakeholders in the development of the four policies. NYSED officials and members of the Board of Regents described a reliance on BOCES, Regional Information Center (RIC), or Rural Schools Association (RSA) officials to represent the rural voice in the NYS policy process. Representatives from these organizations were perceived by state officials as responsible for sharing rural concerns and interests with other stakeholders, though district leaders did not perceive this engagement to sufficiently capture the rural voice in policymaking. District leaders in this study were frustrated with the perception that their interests were not given serious attention by state officials, which appears to have negatively affected the will of rural school district leaders to engage in the policy process.

District-level interviewees in this study shared the perception that state officials do not understand rural needs and interests. Increasing the presence of the rural voice in policy discussions is a key step in pursuing an increased awareness and improved understanding of rural
needs and issues. State officials should pursue more direct efforts to engage the rural voice in the policy process and move past the reliance on these organizations. NYSED should consider cross-tabulating geographic locale designation systems to improve the accuracy of district classifications and ensure that stakeholders engaged represent rural areas of the state. Rural school district leaders, teachers, and other professionals should likewise increase efforts to engage in the policy process as opportunities become available.

2. Institute a System to Check for Stakeholder Representation

Second, individual efforts for increasing the rural voice in the NYS policy process should be accompanied by institutional improvements in NYSED’s internal processes for ensuring stakeholder representation. The findings of this study revealed that different NYSED offices and initiatives employed different approaches to stakeholder inclusion. For each of the four policies in this study, rural stakeholder engagement was limited or absent in policy development. Moreover, some NYSED officials acknowledged that they had not considered differing needs and interests of rural school districts or whether the rural voice has been represented in policy development prior to participating in this study. This finding supported the perception of district-level interviewees that the rural voice may be neglected by state officials in the NYS policy process, suggesting that an institutional check for stakeholder representation is needed at NYSED.

District leaders believed that state officials should consider all policies from a rural lens during design, specifically thinking of each policy requirement in terms of district capacity and access to additional supports, resources, and opportunities. State officials should partner with rural leaders and collaborate across NYSED offices to develop and/or improve criteria, standards, and internal controls for representation of all stakeholders in policy initiatives,
including procedures for review of stakeholder outreach during the development of state education policies. Leaders from different NYSED offices could collaborate to identify approaches that have proven most successful in past policy initiatives. Adjusting current state-level approaches to stakeholder engagement could introduce more consistency across offices and reduce the neglect of rural needs, interests, and representation in policy development.

3. Coordinate Policy Roll-Out, Improve Clarity and Deadlines

A main finding of this study was that a leading challenge for rural school districts is the smaller administrative capacity that limits the time and expertise available in their districts for policy implementation. This study looked at only four of countless NYS education policies for school districts. Two of these policies required detailed annual updates, both due September 1st of each year. A third policy’s long-term implementation plan was described by district leaders as asking too much of the smaller administrative capacity of rural schools. Most district interviewees also mentioned the requirements of several other policies not included in this study that they described as competing for their time and attention. District leaders reported frustrations with the lack of clarity they perceive in state education policies when implementation begins. They reported that it is not always feasible to find the time to become well-versed in the requirements. One superintendent commented that discussing the four policies in this study “makes me realize a little bit more that some of these policies and procedures are done for a reason. I don’t think [state officials] do the best job explaining why.”

State officials should improve the coordination of policy roll-outs across NYSED offices, including increasing the clarity of how policies are first presented to schools and districts. All parties in this study discussed a shared perception that too much work in the NYS policy process is being done in silos. Coordinating the rollout of policy requirements as well as deadlines for
implementation could reduce the strain on districts with fewer administrators and improve the ability of schools and districts to meet more than the minimum requirements. State officials should consider what is being asked of schools and districts and when, including reviewing how many policy deadlines are set for the beginning of the new academic year and whether some of those deadlines could be staggered. Moreover, improved collaboration across NYSED offices could afford district leaders more time to become well-versed in the policy purposes and requirements, which may introduce opportunities for more innovative practices to be developed at the local-level.

4. **Expand Policy Conversations About Equity**

Finally, educators should expand conversations about equity in the policy process to include discussions of equity for rural schools and students. A significant finding of this study was the differing perception of district leaders and state officials regarding the place of rural schooling in discussions of equity. District leaders perceived the policy process to be based in concerns regarding equity; however, most district leaders believed that equity for rural schools, students, teachers, leaders, and communities has not been part of the conversation because they perceived state officials lacked understanding of rural needs and interests. In contrast, state officials made little mention of equity as it related to rural schooling and the policy process in this study.

Rural district leaders should lead the expansion of equity conversations to include the rural voice by continuing to present the equity needs and interests of their districts. State officials should collaborate with rural educators directly to increase awareness of inequities attributable to place as they relate to providing more equitable education to all students. Key to greater awareness of rural equity concerns is re-considering the opportunities available to
students and educators in urban areas. For example, the specialized schools in New York City toured by one of the NYSED officials in this study can be compared with the opportunities available to students and educators in rural areas, such as having only professional learning opportunities available through the local BOCES. District leaders in this study perceived these differences as inequitable. However, neither NYSED official indicated that these examples raised questions about equity across different types of districts. Increased consideration of differences attributable to geographic place, such as these, may improve equity in education and educational opportunities for rural school districts.

**Recommendations for Future Research**

Several opportunities for future research are presented in this study. First, scholars should replicate this study and the exploration of these four state education policies in NYS suburban and urban school districts to compare and contrast policy implementation across all geographic locales. Expanding this study to compare across all types of districts could reveal important similarities and differences in district needs, interests, will, and capacity to implement these policies as they relate to size, location, and perceptions of state and district officials.

Secondly, this study began exploring the perceptions of BOCES and RIC officials, revealing some important distinctions from those of state and district leaders. For example, BOCES interviewees and district interviewees reported different experiences regarding implementation of the Student Data Privacy policy. The BOCES Data Privacy Representative interviewed for this study expressed feeling more frustration and pressure in the implementation process than district leaders, explaining that “I felt like I had to run out ahead…to make sure I had the right answers” for the districts. Similarly, with Professional Learning, the BOCES Professional Learning Specialist perceived a greater need for the Professional Learning policy on
a larger scale across the BOCES’s component districts than was expressed by district-level interviewees. Only two BOCES officials and one RIC representative were interviewed for this study, but future research should examine these dynamics further.

Scholars should also replicate this study with a different sample of state education policies to explore additional topics, requirements, and resource capacity. The limited capacity for rural school districts to implement state education policies was a significant finding of this study; however, none of the policies examined in this study were designed with financial or other resources attached to support district implementation. Interviewees reported that schools and districts had little, if any, engagement with state officials during the implementation of these policies. District leaders did describe some past experiences where state officials were directly involved in implementation. These typically were initiatives where their districts received grants or other financial resources. Further research should investigate the similarities and differences in the design and implementation of policies with resources attached in rural school districts.

Additionally, scholars should investigate the different approaches to stakeholder engagement at the state-level found in this study as it relates to the efficacy of policy solutions and their implementation in rural school districts. A significant finding of this study was the differing perceptions of state and districts officials regarding the representation of rural needs and interests in the NYS education policy process. District leaders believed, and state officials confirmed, that NYSED relies on organizations, specifically the Rural Schools Association (RSA), to represent the rural voice in policymaking. RSA representatives were not included in this study. However, some district leaders did not perceive RSA’s representation to be sufficient inclusion of rural stakeholders in the policy process. Furthermore, this study found limited, if any, inclusion of rural stakeholders in the development of the four policies. Future research
should explore stakeholder engagement in state education policy design further and compare different approaches to achieving stakeholder representation.

Scholars could also conduct similar studies in other states to discover the extent to which the findings of this NYS study are similar elsewhere. As discussed with the findings of my first question, each of the policies included in this study came from larger, national pursuits and leading topics in education that likely have had policies adopted and implemented in school districts across the United States that could be explored. Finally, this qualitative study could also serve as a foundation for a statewide or nationwide quantitative survey of rural school district leaders and state education officials on policy design and implementation, and perceptions of rural needs, interests, and capacity.

Conclusion

This study found that improving rural representation in the policy process may ultimately depend on the efforts of policymakers to change the rural perception that “[state officials] don’t think about folks like us” (Rural Leader). State officials and rural district leaders face the challenge of overcoming long-standing social constructions of the “Rural School Problem” before they can begin to mitigate the influences of metro-centrism in the policy process. “People lose sight of the amount of quality things that small districts have,” one Rural Superintendent explained: “When they think of the types of people that are gonna change the world, they think all those people have got to be coming out of suburban and urban schools. They’re not… Many of them are coming from rural schools.”

For state officials, considering policy from a rural lens may be a challenge. “It’s hard to make policy,” one Regent emphasized, and it’s hard to view policy from a rural lens when “most [state policymakers] don’t have experience in rural districts.” However, state officials in this
study expressed an openness to recommendations for better including the rural voice in the policy process. Moreover, a key finding of this study was the willingness to collaborate in future policy initiatives shared by both state and district leaders. “We all have limited resources and if what you’re doing isn’t helping somebody, then we should look at it from a different lens,” one NYSED official explained. Findings from the interviews with state officials and rural district leaders in this study therefore suggest the prospects for improving rural representation in NYS education policymaking are hopeful.
Appendix A: Stratified Sample of Rural School Districts Mapped


The points on the map indicate the location of each of the 154 rural, public school districts in the state of New York classified as rural by both the National Center for Education Statistics (NCES) and New York State Education Department (NYSED) locale designation systems. Fringe, distant, and remote designations signify remoteness from urban clusters (2,500 to 50,000 people) and urbanized areas (over 50,000 people). Fringe rural is closest, at less than or equal to 2.5 miles from urban clusters and less than or equal to 5 miles from urbanized areas. Remote rural is farthest, exceeding 10 miles from urban clusters and 25 miles from urbanized areas. Distant rural covers the places between the two extremes (Geverdt 2017).
Appendix B: Sample Interview Questions

Research Question #1:

What are key similarities and differences in the design of a purposive sample of four recent New York State education policies?

Interview Questions for School Board Presidents, Superintendents, Building Principals, and School Business Officials

For each policy, one at a time:

1.1 What were your initial reactions to this policy as it pertains to your district and why?
1.2 Were the policy goals well-suited to the needs and interests of your district? (e.g., reasonable, practical, realistic, fitting, etc.) Why or why not?

Interview Questions for State Education Officials

For each policy, one at a time:

1.1 What were the purposes of this policy? Why was it being pursued by the Department?
   1.1a What outcomes did you anticipate in districts from this policy?
   1.1b Were the policy goals reasonable for rural school districts? Did they fit their needs and interests? Why or why not?

1.2 This is a broad policy that applies to different types of school districts. How did state officials go about designing a broad policy like this? What were some key elements of the overall process? (e.g., considerations, decisions, strategies, justifications, outreach, etc.)
   1.2a Were differences in district needs and capacity, particularly rural districts, considered or accounted for in the formulation of this policy? Why or why not?
1.3 What were your initial thoughts on the final version of the policy as adopted? Were there any notable differences or changes that occurred from the initial ideas for the policy and the final version?

Research Question #2:

What are key similarities and differences in the will and capacity of a random sample of three rural school districts to implement these education policies?

Interview Questions for School Board Presidents, Superintendents, Building Principals, and School Business Officials

For each policy, one at a time:

2.1 What resources or benefits did this policy offer for your district?

2.2 Did your district have adequate capacity to implement the policy? Were there any resources or support you needed?

2.3 Did the state provide any financial or other support for implementing this policy? If so, was it adequate?

2.3a What was the extent of state oversight? (e.g., pressure, flexibility, etc.)

2.4 Did your initial opinions about the policy change during implementation?

Interview Questions for State Education Officials

For each policy, one at a time:

2.1 What resources or benefits did this policy offer for rural school districts in particular?

2.2 Did rural school districts have adequate capacity to implement the policy?
2.3 Did the state provide financial or other support to rural school districts to implement this policy? If so, what kinds of support? Was it adequate?

2.3a What was the extent of state oversight during implementation?

2.4 Were rural school districts enthusiastic about implementing this policy? What type of feedback did you receive, if any?

2.5 Did your initial opinions about the policy change during or after district implementation? Did any new issues or concerns come to light?

Research Question #3:

What are key similarities and differences in the perceptions of New York State education officials and rural school district leaders regarding the alignment of these policies with the needs, interests, and capacity of rural school districts?

Interview Questions for School Board Presidents, Superintendents, Building Principals, and School Business Officials

Discussing the four policies overall:

3.1 Do you know whether your district and/or other representatives of NYS rural school districts were consulted about these policies when they were being designed? For example, were there surveys, phone calls, meetings, or workgroups to obtain input from rural school districts?

3.2 Do you think rural school districts, in particular, should have been consulted when the state was designing these policies? Why or why not?
3.3 Do NYS officials typically consult your district and/or representatives of NYS rural school districts before they adopt new state policies? What are your thoughts on the State Education Department in these matters?

3.4 Do NYS education policies usually reflect the needs and interests of rural school districts like yours? Why or why not?

3.5 Do state education officials address the concerns of rural school districts? Are they willing to understand your needs? Are they able to address your concerns?

3.6 Is there anything about NYS education policy you would change in order to better meet the needs and interests of rural school districts such as yours?

**Interview Questions for State Education Officials**

Discussing the four policies **overall**:

3.1 Were school districts consulted during the policy design process? If so, which ones and how? (e.g., surveys, phone calls, meetings, workgroups, etc.) How were districts selected?

3.1a Were rural school districts, in particular, consulted about these policies when they were being designed? If so, how? If not, why not?

3.2 Do you think rural school districts should have been consulted when these policies were being designed? What are the pros and cons?

3.3 How common is it for NYS officials to consult with NYS rural school districts when designing a new state policy? What are your thoughts on these matters?

3.4 Do NYS education policies usually reflect the needs and interests of rural school districts? Why or why not?
3.5 What steps do you take to understand the needs of rural school districts?

3.6 Is there anything about NYS education policy you would change in order to better meet the needs and interests of rural school districts?

Final Two Questions for All Interviewees:

4.1 Is there anything else about rural school districts and state education policy you would like to share?

4.2 Is there anyone else knowledgeable about state education policy and rural school districts with whom I should talk?
Appendix C: Fringe Rural District Success Measures

<table>
<thead>
<tr>
<th>HEDI</th>
<th>Points</th>
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<tbody>
<tr>
<td>H</td>
<td>Highly Effective</td>
</tr>
<tr>
<td>E</td>
<td>Effective</td>
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<td>D</td>
<td>Developing</td>
</tr>
<tr>
<td>I</td>
<td>Ineffective</td>
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</tbody>
</table>

HEDI percentiles vary for each success measure.

Example of Total Evaluation:

<table>
<thead>
<tr>
<th>Success Measure</th>
<th>Scaled Score</th>
<th>HEDI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disciplinary Referrals</td>
<td>18</td>
<td>H</td>
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<tr>
<td>Attendance</td>
<td>17</td>
<td>E</td>
</tr>
<tr>
<td>Graduation Rate</td>
<td>19</td>
<td>H</td>
</tr>
<tr>
<td>Participation Rate</td>
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<td>H</td>
</tr>
<tr>
<td>Student Achievement</td>
<td>16</td>
<td>E</td>
</tr>
<tr>
<td>Overall Average</td>
<td>18</td>
<td>E</td>
</tr>
</tbody>
</table>

Points Possible: 20

Points Earned: 18

Points Not Earned: 2
Appendix D: Description of Sample

School District Information

The three rural school districts sampled were differentiated by their remoteness from urbanized areas. The Fringe Rural District was located closest to urbanized areas while the Remote Rural District was located farthest from urbanized areas. Each district was randomly sampled from a list of 154 rural school districts in NYS, identified by cross-tabulating the locale designations for public school districts defined by the National Center for Education Statistics (NCES) and by NYSED. To maintain confidentiality, the districts are referred to as: Fringe Rural District, Distant Rural District, and Remote Rural District.

Fringe Rural District

The most district-level interviews were completed in the Fringe Rural District. The Fringe Rural District had the largest administrative staff among the districts sampled, consisting of a superintendent, three building principals, and a director of special programs. All five of these leaders and the school business official (SBO) were interviewed for this study. The SBO in this district was a shared business official that also served as the SBO in a neighboring district. The Fringe Rural District was the only district sampled that has multiple buildings – one serving Pre-Kindergarten (PK) through second grade, one serving grades three through six, and one serving grades seven through twelve.

The Fringe Rural District enrolled just over 700 students as of June 30, 2018 (NYSED, Data Site n.d.). The district’s 2019-20 four-year graduation rate was 93% of 55 students. NYSED’s recent College, Career, and Civic Readiness indicator ranked the Fringe Rural District at Level 4 of 4 for how well students were being prepared for life beyond high school (NYSED, Data Site n.d.). The Fringe Rural District employed about 70 teachers in 2019-20, of which 13%
were identified as inexperienced and 4% were teaching out of their subject area (NYSED, Data Site n.d.).

The Fringe Rural District is classified as a rural high need district by NYSED’s need to resource capacity (N/RC) index, which measures the district’s ability to meet the needs of students based on local poverty and wealth (NYSED, Office of Information and Reporting Services 2019). High N/RC districts are at or above the 70th percentile on the index. Fifty-four percent (54%) of students met the criteria for being economically disadvantaged in this district. The Fringe Rural District was the only one in the sample classified as a Target District (TD) by NYSED’s accountability designations for the 2018-19 academic year, meaning that the district was identified as struggling to prepare some student subgroups based on indicators outlined in the state’s ESSA plan (NYSED, Office of Information and Reporting Services 2019).

Distant Rural District

The fewest number of district-level interviews were completed in the Distant Rural District. The superintendent and director of special education were interviewed, but I was unable to interview the building principal, SBO, or any school board members. The Distant Rural District houses all grades PK-12 in one building with one principal. No assistant superintendents, assistant principals, or other directors of special programs were employed by the district. Two leaders from the Distant Rural District’s BOCES were interviewed for the services they provide this district in meeting policy requirements for professional development and data privacy.

The Distant Rural District enrolled just under 400 students as of June 30, 2018 (NYSED, Data Site n.d.). The Distant Rural District was likewise ranked at Level 4 of 4 on NYSED’s College, Career, and Civic Readiness Indicator with a 2019-20 four-year graduation rate of 91%
of 33 students (NYSED, Data Site n.d.). In 2019-20, the Distant Rural District employed just over 40 teachers, of which 18% were inexperienced and 7% were teaching out of their subject area (NYSED, Data Site n.d.).

Similar to the Fringe Rural District, the Distant Rural District is classified as a rural high need district by NYSED’s N/RC index (NYSED, Office of Information and Reporting Services 2019). Forty-four percent (44%) of students met the criteria for being economically disadvantaged in this district. For the 2018-19 academic year, the Distant Rural District was in Good Standing (GS) according to NYSED’s accountability designations, meaning the district was successfully preparing their student subgroups based on ESSA indicators (NYSED, Office of Information and Reporting Services 2019).

Remote Rural District

Three interviews were completed at the Remote Rural District. Like the Distant Rural District, the Remote Rural District houses all grades PK-12 in one building with one principal and no assistant superintendents or assistant principals. The building principal in the Remote Rural District is also the director of special education. Both the superintendent and building principal were interviewed in the Remote Rural District, as well as one member of the school board of education. A RIC representative was also interviewed for the services they provide districts in meeting policy requirements for data privacy.

The Remote Rural District enrolled just over 300 students as of June 30, 2018 (NYSED, Data Site n.d.). The Remote Rural District was ranked Level 3 of 4 on NYSED’s College, Career, and Civic Readiness Indicator with a 2019-20 four-year graduation rate of 81% of 32 students (NYSED, Data Site n.d.). In 2019-20, the Remote Rural District employed about 30
teachers, of which 7% were inexperienced and none were teaching out of their subject area (NYSED, Data Site n.d.).

Similar to the Distant Rural District, the Remote Rural District was in GS for the 2018-19 academic year. However, unlike the Fringe and Distant Rural Districts, the Remote Rural District is classified as an average need district in NYSED’s N/RC index (NYSED, Office of Information and Reporting Services 2019). Average need districts are between the 20th and 70th percentile on the index. Fifty-six percent (56%) of students met the criteria for being economically disadvantaged in this district.

State Education Description

NYSED is composed of eight main branches overseen by the Commissioner of Education, who serves at the will of the Board of Regents. This study looked at policies targeting public school districts all under the purview of the Office of P-12 Education, one of the eight main branches of NYSED. Each of the policies sampled were overseen by different program offices and units within NYSED’s Office of P-12 Education.

Two members of the Board of Regents were interviewed for this study to discuss each of the four policies sampled. One NYSED official was interviewed about the Regulations of the Commissioner of Education §100.2(dd) for professional learning from the Office of Educator Quality and Professional Development. Two NYSED officials were interviewed about Meal Shaming, Regulations of the Commissioner of Education §114.5, from the Office of Child Nutrition. One NYSED official was interviewed about Part 121 of the Regulations of the Commissioner of Education for student data privacy from NYSED’s Data Privacy and Security unit, and two NYSED officials were interviewed about the Regulations of the Commissioner of Education §155.17 for school safety plans from the Office of Student Support Services.
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