Humanizing Policy Implementation in Higher Education Through an Equity-Centered Approach

Eric R. Felix
San Diego State University

H. Kenny Nienhusser
University of Connecticut, Storrs

With an urgency to leverage existing and emerging policy reforms to improve student outcomes by centering educational equity, this manuscript explores the critical role of policy implementation in higher education–specifically in community colleges. In doing so, we explore historical and contemporary approaches to higher education, highlighting how policy implementation often serves as an opportunity and barrier to educational equity. In the first half, we summarize the literature on policy implementation in higher education and weave together a conversation that centers on the importance of equity. Then, we highlight our Equity-Centered Policy Implementation Framework and its six tenets to consider in centering the role of the individual within the implementation process and how they influence what implementers can achieve with policy reform. These tenets are Identity Conscious, Implementation Imaginations, Institutional Complexity, Sociopolitical Context, Layered Reforms, and Leveraged for Educational Equity. Next, we share implementation stories that draw from our body of research conducted across two higher education contexts (i.e., the California Community Colleges and City University of New York [CUNY] community colleges) to showcase research-informed strategies and approaches to policy implementation that led to more robust and transformative equity-oriented implementation processes in community college.

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Eric R. Felix, efelix@sdsu.edu, **San Diego State University***

H. Kenny Nienhusser, h._kenny.nienhusser@uconn.edu, **University of Connecticut, Storrs**

*Corresponding Author

Abstract: With an urgency to leverage existing and emerging policy reforms to improve student outcomes by centering educational equity, this manuscript explores the critical role of policy implementation in higher education–specifically in community colleges. In doing so, we explore historical and contemporary approaches to higher education, highlighting how policy implementation often serves as an opportunity and barrier to educational equity. In the first half, we summarize the literature on policy implementation in higher education and weave together a conversation that centers on the importance of equity. Then, we highlight our Equity-Centered Policy Implementation Framework and its six tenets to consider in centering the role of the individual within the implementation process and how they influence what implementers can achieve with policy reform. These tenets are Identity Conscious, Implementation Imaginations, Institutional Complexity, Sociopolitical Context, Layered Reforms, and Leveraged for Educational Equity. Next, we share implementation stories that draw from our body of research conducted across two higher education contexts (i.e., the California Community Colleges and City University of New York [CUNY] community colleges) to showcase research-informed strategies and approaches to policy implementation that led to more robust and transformative equity-oriented implementation processes in community college.

Introduction

While higher education degree attainment is frequently considered an instrument to ameliorate societal inequalities, that goal has been challenging to achieve given the persistent inequities that exist in higher education (Brown & James, 2020; Haverman & Smeeding, 2006). The community college, often a vehicle for supporting marginalized communities' college access and success, has faced relentless challenges as they seek to support marginalized students (Grubbs, 2020). These challenges include systemic funding disparities relative to other publicly supported institutions (Dowd, 2003; Mitchell et al., 2019), increased demands to function as the segment of education that meets the needs of all learners with inadequate support, an inability to serve lower-income and racially-/ethnically-minoritized students (Fletcher & Friedel, 2018), all the while being over-legislated by state and local policymakers complicating the ability to serve students equitably (Felix, 2021b).

To address the challenges in community college, various federal, state, and local policies have been formulated to remedy institutional policies and practices that reproduce educational inequity. For example, reform efforts to remove developmental education, improve onboarding and first-year retention, simplify degree majors and career pathways, increase available financial aid, and the creation of standalone baccalaureate programs all seek to make an impact on student success. However, one area often overlooked in the public policy realm is how, if at all, these policies are intended to address persistent higher education inequities. Between the announcement of new educational reform and its documented impact years later, the process of implementation sits in the middle as a complex, messy, and time-elongated step where the reform unfolds as institutional leaders attempt to move policy intents from what is promised to what is practiced (Felix, 2021a; Felix & Trinidad, 2020).

The policy stages framework highlights five phases in the policy lifecycle: agenda setting, policy formulation, policy selection, policy implementation, and policy evaluation (Anderson, 2003; Giest et al., 2015; Hoefer, 2021). Agenda setting involves identifying the problem and gaining the attention of policy actors on the issue of interest (Anderson, 2002; Hoefer, 2021). Policy formulation entails recognizing possible policies that could address the issue or problem and narrowing them down to those that decision-makers might accept (Hoefer, 2021). Policy selection comprises identifying the proposal that could address the issue or problem (Anderson, 2002; Hoefer, 2021). Policy implementation involves putting into action the policy. Finally, policy evaluation entails assessing the policy outcomes (Anderson, 2002; Hoefer, 2021). While the policy stages framework is a helpful tool to use in understanding the policymaking process, there are several critiques (Hoefer, 2021). First, the stages framework seems to imply a rational approach to policymaking. Second, this framework infers a linear process that begins with agenda setting and finalizes with policy evaluation. Third, the stages framework is only descriptive and fails to examine any causal linkages between the stages.

Policy implementation, the focus of this chapter, has been referred to broadly as "what happens after a bill becomes law" (Anderson, 2003, p. 193). This process, however, is multifaceted, complex, and involves an extensive array of actors (McLaughlin, 2006; Viennet & Pont, 2017). Although vast and diverse, the study of policy implementation has been described by many scholars as "misery research" due to its deficit-framed and negative outcomes (McLaughlin, 2006, p. 209). Further, other scholars have framed policy implementation as leading to an "intellectual dead end" because of the literature's lack of generalizable theories or well-developed frameworks (deLeon & deLeon, 2002, p. 467; Sætren, 2005). While many

scholars have framed policy implementation as one of the shortcomings in the policy process, we conceptualize it as one opportunity to attend to persistent inequities.

Within the higher education literature, policy implementation has been largely an overlooked area of study (Gonzalez et al., 2021). While true, the last decade has seen an emergence of critical higher education policy implementation scholars who have shed light on further understanding the complexities of implementing policy, while also framing this policy stage as a tool to address inequities (Ching, 2023; Connors, 2022; Felix, 2021a, 2021b; Felix & Ramirez, 2020; Nienhusser, 2018; Nienhusser & Connery, 2021). It is this final understanding of policy implementation as an opportunity to address higher education equity that we frame the focus of this chapter. We argue that framing policy implementation from an opportunity lens allows policymakers and implementers to center elements such as implementers' identities as a strength in the implementation process (Felix, 2021a; Nienhusser & Connery, 2021), to capitalize on the vagueness in public policies (Nienhusser & Connery, 2021), and to give implementers agency to act (Felix et al., 2015; Gonzalez et al., 2021) as they seek to eradicate inequalities that are rampant in our higher education systems and institutions (Baber et al., 2019; Ray, 2019).

Policy Implementation in the Community College Context

We focus on the community college sector as it is described as a "democratizing" force in the U.S. higher education landscape (Boggs, 2010; Dougherty, 1994, 2002, p. 316). Though some critics have noted how community colleges serve as a "cooling out" function (Clark, 1963, p. 229) and "part of an educational tracking system that reproduces social inequality" (Pincus, 1983, p. 411), the community college remains an access point into higher education for many underrepresented students (Rose, 2012). Regardless of the philosophical underpinnings of

supporting or discouraging postsecondary access and completion, the community college sector has a substantial stake and purpose in the U.S. higher education system.

There are 1,043 community colleges in the United States (comprising approximately 20% of all degree-granting postsecondary education institutions; American Association of Community Colleges [AACC], 2022). In 2020 these institutions enrolled 10.3 million students (6.2 million students in credit programs and 4.1 million students in non-credit programs; AACC, 2022). However, within the last decade, the community college sector has seen a steady decline in enrollments (National Center for Education Statistics, 2022), with greater declines since 2020 attributed to the COVID-19 pandemic (Knox, 2022; National Student Clearinghouse Research Center, 2022). Racially-minoritized students experienced a large decrease in their community college enrollment during that period. From Fall 2020 to Fall 2022 Black, Indigenous, and People of Color (BIPOC) communities' enrollment fell–Asian 10.0%, Black 5.3%, Native American 4.9%, and Latine/x[1] 4.7% (National Student Clearinghouse Research Center, 2022). Many community colleges are also minority-serving institutions (i.e., Historically Black Colleges and Universities, Hispanic-Serving Institutions, Tribal Colleges and Universities, Asian American and Pacific Islander Serving Institutions). As sites of access, community colleges enroll high percentages of racially-/ethnically-minoritized students—53% of American Indian, 50% of Latine/x, and 40% of Blacks (AACC, 2022). The majority (56%) of community college students received some form of financial aid (i.e., federal grants, federal loans, state aid, or institutional aid; AACC, 2022).

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[1] We use both Latine and Latinx as gender-inclusive terms, Latine as it is used by Spanish speakers to move away from masculine-based descriptors as well as Latinx which intentionally recognizes gender fluidity and systems of oppression faced by Queer communities (Gonzalez, 2022).

Community colleges fill important voids in the U.S. higher education landscape for students given their open-access mission (Bragg & Durham, 2012; Dougherty, 1994; Nienhusser & Connery, 2021). The colleges provide a wide variety of programs and credentials (Dougherty et al., 2017), a more affordable postsecondary option (Sublett & Taylor, 2021), a geographically accessible option (Reyes et al., 2019), more flexible in meeting their communities' needs (Salomon-Fernández, 2019), and a more supportive environment for students who may need academic supports (Edenfield & McBrayer, 2021), among many others.

This chapter seeks to highlight the role policy actors have in the implementation of policy reform and the ways in which this implementation can drive equitable change. We begin by synthesizing the known scholarship on policy implementation into three schools of thought: rational-scientific, cognitive-cultural, and critical. Next, we introduce and describe six tenets drawn from our synthesis that scholars should consider in the study of higher education policy implementation. Third, we provide implementation stories from our empirical research to reveal what policy implementation looks like in practice in community colleges in relation to those six tenets, especially with respect to addressing higher education inequities. In the final section, we offer concluding thoughts for higher education policy scholars, higher education systems, and institutional agents with the desire to use policy implementation as a lever of opportunity to eradicate persistent higher education inequities for marginalized communities.

Synthesizing the Policy Implementation Literature

How we study and understand policy implementation dictates what we as researchers assume, observe, and value as we interrogate the process of educational reforms unfolding over time and across varying institutional contexts. As we engage with the complexity of policy implementation, it is critical that we recognize the different schools of thought and scholarly

genealogies driving how we examine the policy process in higher education. This exploration is especially important as policy research has placed varying levels of attention and care on the actual implementers—the people who carry out the reform—based on the theoretical perspective taken. In some schools of thought, the implementer is not a focal point in the enactment process (e.g., Top-Down Approach), at other times the implementer is assumed to have symmetrical information while being a relatively stable actor (e.g., Institutional Rational Choice), be agentic actors shaped by personal experiences (e.g., Sensemaking), or serve as critical navigators of reform using policy towards racially-just ends (e.g., *Trenza* Policy Framework). We surveyed decades of implementation research to synthesize and categorize how we understand the study of policy implementation in higher education and the emphasis placed on the institutional actors (e.g., street-level bureaucrats, institutional agents, implementers) who manage and lead reforms at the local-level. This subsequent section organizes the literature on policy implementation into three schools of thought with particular attention to the theories and perspectives developed over time and how they each emphasize different aspects of the enactment process.

Given the intricacy of the policy process in addressing social problems—one that involves numerous actors, diverse environments, institutional factors, and often unforeseen obstacles—researchers have developed and applied theoretical frameworks to guide their work (Heck, 2004; Laswell, 1950; Sabatier, 1999). Since the Great Society's federal reforms in the 1960s, there has been an interest in understanding and evaluating public policy, from formulation to implementation and its impact. With such an ambitious social agenda, policy analysts in the 1970s were focused on documenting and understanding the impact of government programs that included wide-scale programs to reduce inequality and poverty, increase urban renewal and development, and expand access to education from the creation of Head Start to making colleges

and universities more affordable to attend. As deLeon and deLeon (2002) describe it, the 1970s

ushered in the formal study of implementation within public policy and offered the opportunity

for policy analysts to examine the "major stumbling block in the policy process" and improve the

public administration of social programs (p. 468). By then "implementation" as a term entered

the public policy lexicon and became a particular interest to education scholars seeking to assess

federal reform efforts brought about by the passage of the Elementary and Secondary Education

Act (Kingdon, 1984; Mazmanian & Sabatier, 1981). As a specific line of inquiry,

implementation studies grew from Pressman and Wildvasky's 1973 work examining Economic

Development Projects in Oakland, California where they described the enactment process as one

where "policy is carried out, accomplished or fulfilled" by public servants (p. 13). Interestingly

enough, the publication titled "*Implementation*" was subtitled "*How Great Expectations in*

Washington are Dashed in Oakland" alluding to the difficulty of administering public policy and

achieving the good intentions of reform in practice. Since then, a rich history of frameworks,

theories, and models emerged to understand how a policy is interpreted, negotiated, and enacted

at the local-level; namely schools, district offices, colleges and universities, and system-level

agencies.

Organizing Policy Implementation Research as Schools of Thought

Scholars have attempted to categorize and present policy analysis frameworks in coherent

ways, many of which follow the paradigmatic developments in academia where earlier theories

were rooted in rational approaches and then expanded to more interpretivist, and critical ones

(Stein, 2004). For example, Lejano (2006) used epistemological traditions to categorize policy

analysis frameworks into three groups: positivist, post-positivist, and post-constructionist. Heck

(2004) focused on educational policy and synthesized available policy frameworks into rational,

cultural, and critical categories. Sabatier and Weible (2014) authored an edited book on policy theories that focused on two critical elements: the strength of causal theory and its application in active research. Each of these categorizations highlighted the significance of understanding policy analysis traditions and how frameworks have progressed over time to serve policy researchers. Based on our review of the policy implementation literature over the years and in higher education specifically, we present three schools of thought in the next section that capture how policy implementation has been studied in the field. They are Rational-Scientific, Culture and Cognition, and Critical-Emancipatory (See Table 1). Within each sub-section, we delineate epistemological underpinnings, key theories, type of research questions asked (i.e., implementation focus), guiding assumptions, and how they center institutional actors in the enactment process.

Table 1. *Schools of Thought Within Policy Implementation Research*

School of Thought	Definition	Key Theories	Implementation Focus	Assumptions	Implementer Role
Rational-Scientific	● The policy process can be analyzed and simplified through categories, stages, or models rooted in assumptions that actors behave in largely rational or predictive ways.	● Rational Choice ● Cost-Benefit Analysis ● Policy Stage Heuristics ● Principal Agent Theory ● Advocacy Coalition Framework ● Punctuated Equilibrium	● Has the policy been effectively implemented? ● Did the policy design, causal theory, and instruments use structure conditions for successful implementation? ● Did the policy meet its intended goals and outcomes?	● The policy process is objective and value-free. ● Intentional pursuit of interests by individual actors underlies all behavior.	● Implementer largely follows policy mandates with little to no agency.
Culture-Cognition	● Acknowledge the complexity in which policies are implemented focusing on cultural and cognitive factors that may shape and influence the process.	● Interpretive Policy Analysis ● Discourse Analysis ● Sociocultural Analysis ● Sensemaking ● Social Construction of Policy Targets ● Street-Level Bureaucrats	● How does an organization's culture, values, and beliefs influence implementation? ● How do actors make sense of policies? ● In what ways do actors' prior experiences and knowledge influence how a policy's meaning and goals are interpreted?	● Culture and cognition influence the policy process. ● Policy formulation and implementation are situated in multiple social contexts.	● Implementer is an influential actor who centers their identities and lived experiences in their work.
Critical-Emancipatory	● Policy and its implementation are seen as a practice of power that needs to be deconstructed to understand the impact on marginalized groups as reforms unfold across educational levels.	● Feminist Theory ● Critical Policy Analysis ● Critical Race Theory ● Critical Discourse Analysis ● Emancipatory Frameworks ● Institutional Agents	● What is policy? What does policy do? ● How are policy targets constructed, framed, and impacted by implementation? ● Who continuously benefits from the implementation of a policy? Who continually loses from the implementation of a policy? ● In what ways does the policy incorporate the experiences of marginalized communities in the implementation process?	● Policies have underlying values, ideologies, and power dynamics that impact marginalized communities. ● Recognizes the lived experiences of those impacted by the policy.	● Implementer carefully considers the role of systemic barriers in their work.

Rational-Scientific

In the early years of policy analysis, researchers sought ways to simplify the policymaking process and the study of implementation. Pioneering policy scientist Harold Lasswell (1958) viewed the policy process as several ordered sequences of stages, or steps (John, 2012). These steps include agenda setting, policy formulation, policy selection, policy implementation, and policy evaluation. Early theories within this category include Easton's (1965) systems framework, Lowi's (1972) policy typologies, and Mazmanian and Sabatier's (1980) policy implementation framework. At the same time, these policy perspectives followed rational assumptions entrenched in economic, bureaucratic, and systems-oriented theories (Lejano, 2006). Rationality implied that implementation was supposed to occur as designed since implementers were viewed as systematic, efficient, informed, and consistent (Carley, 1980).

Key Elements and Assumptions

The Rational-Scientific school of thought has four shared assumptions. First is the belief that the policy process, as complex as it is, can be simplified to a reasonable number of steps or factors. Carley (1980) described this element as the "application of analytical rationality to policy problems that involves the disintegration of some complex problem into simpler models" (p. xi). Stages heuristics introduce "clarity and elegance" into the explanation of public policy research (John, 2012, p. 21). Second, a rational-scientific perspective to studying policy implementation believes that policymakers' choices, organizational responses, and individual actors are rational and that behavior and response to mandated change can be controlled. Within this perspective, policies are systems of thought and action that are used to regulate behavior toward an intended result (Stein, 2004). Third, policies and subsequent analyses, are considered

objective, value-free, and neutral, hiding the potential biases of policymakers and implementers alike. Lastly, there is an assumption that full information to identify, interpret, and implement a policy by actors is available (Young, 1999). This predicted outcome is tied to the notion within traditional approaches that actors have the required information, fidelity to policy goals, and resources to enact the prescribed changes (Heck, 2004).

This approach to policy analysis focuses on the macro-level aspects using a series of stages to make assumptions about how organizations behave, the rationality of policy actors, and the alignment between policy goals and policy targets (Schneider & Ingram, 1993). The strength of the rational-scientific approach is the ability to highlight the linkages within the policy process and explore identifiable forces that drive the process (Kingdon, 2003). Within this school of thought, there is an emphasis on "top-down" approaches that start with policy formulation and then examine, in a linear fashion, the extent to which its objectives were achieved over time (Sabatier, 1986). This linear process is especially helpful when a researcher is interested in understanding the *hows* and *whys* of implementation, to systematically understand how certain variables within their contexts influence the implementation of policy. Similarly, these frameworks allow researchers to backward map the successful, flawed, or failed attempts to implement policy (Levinson et al., 2009).

Frameworks Within Rational-Scientific and the Role of the Implementer

More contemporary theories in this first school of thought include the Institutional Analysis and Development (IAD) framework (Ostrom et al., 2014), Multiple Streams (Kingdon, 1984; Ness, 2010; Zahariadis, 2007, 2014), and Advocacy Coalition Framework (Sabatier, 1986; Sabatier & Jenkins-Smith, 1999; Sabatier & Weible, 2014). Researchers using frameworks

within this School focus on understanding if a policy's causal theory led to effective implementation, understanding why a policy was successful or failed, and the impact and outcomes of a policy years after implementation (Heck, 2004). An additional strength of this school of thought is the ability of researchers to use a framework that helps explain policy formulation and enactment across different contexts (Jenkins-Smith et al., 2014). Richardson and Martinez (2009) used the IAD framework to understand how state governance structures, political actors, and policy lead to developing performance funding in higher education. In a recent book by Dougherty and Natow (2015) *The Politics of Performance Funding for Higher Education*, the authors used the Advocacy Coalition Framework to trace the policy origins, development, and implementation of performance-based funding models in eight states.

Critiques of the Rational-Scientific Approach

Theories and models developed within this approach have significantly influenced the field of public policy and how scholars interrogate policy implementation (Carley, 1980; Weible & Sabatier, 2018). Although the rational-scientific approach provides a simplified understanding of the policy process by dividing it into distinct parts, there are three primary criticisms. First, Heck (2004) critiques the rational and stages approach for making the policymaking process too simplistic and more ordered and rational than what it really is. He argues that rational models are overly linear and too basic, failing to understand the complexity that occurs "between statehouse and classroom" (Heck, 2004, p. 23). These models fail to account for contextual factors that influence the implementation process. Second, these approaches make unrealistic assumptions about how policymakers, organizations, and actors behave (John, 2012). For example, critics argue that the rational approach is faulty in that it assumes individuals will implement a policy

with fidelity, organizations have information symmetry, and policies are able to create the statutory conditions for successful implementation.

Another criticism of the frameworks within this first approach is the lack of causal theory, top-down bias, and oversimplification of the policy process (Sabatier & Weible, 2014). These models at times paint an inaccurate picture of the policy process by developing abstract models that do not exist in the real world where policy is implemented (John, 2012). Sabatier (1999) went further with his critique stating that process-oriented frameworks had potentially outlived their usefulness since they lacked descriptive accuracy, neglected several levels of government processes, and held a top-down bias. These critiques aligned with the views of Schneider and Ingram (1990) who believed that early frameworks provided an "incomplete portrayal of the complexity and richness of policy" (p. 510). Lastly, these approaches may leave out important informal aspects of the implementation process. In response to these critiques, the second school of thought identified, the cultural and cognition approach, increased scholars' ability to explore the complexity within the policy process by incorporating more variables into the examination of how implementation occurs.

Culture-Cognition

The culture and cognition school of thought captures how implementation is shaped by institutional and individual contexts, emphasizing how cultural (e.g., institutional history, organizational arrangement, shared values) and cognitive elements (e.g., prior experiences, beliefs, positionality) influence the ways that policies are interpreted and implemented. This school of thought emerged in the literature beginning in the 1980s and drew concepts from cultural anthropology, social psychology, education studies, and sociology (deLeon & deLeon, 2002; Levinson et al., 2009), diffusing from historical roots in political science, public

administration, and public policy. Lejano (2006) described this school of thought as intentionally countering traditional positivist approaches by developing more subjective, value-laden, and culturally and historically derived analysis techniques. Yanow (2000, 2007) asserted that the practice of policy analysis had for too long overemphasized rational approaches that "enacted positivistic presuppositions" and now required new perspectives and guiding theories that highlight different elements that interact to influence implementation (2007, p. 110). Through this school of thought, researchers developed new approaches to understanding and describing how reform unfolds at the site of implementation and is influenced by organizational conditions as well as actor-specific characteristics (Levinson et al., 2009; Stein, 2004).

Key Elements and Assumptions

We describe four shared assumptions that guide cultural and cognitive approaches to studying policy implementation. First, this school of thought recognizes that context, culture, and cognition matter in the implementation process and foregrounds the interactions of people, place, and policy. There is an explicit focus on understanding how organizational contexts such as campus culture, institutional identity and history, levels of bureaucracy, and decision structures all shape what actors can do with mandated change. Second, understanding meaning-making is central to studying the implementation process. In moving away from taken-for-granted assumptions like having seemingly "rational" actors or presuming fidelity to reform goals, this school of thought attempts to uncover individuals' beliefs, motivations, and commitments by learning about their worldviews (Ching et al., 2018; Spillane et al., 2006), experience with change management (Chase, 2016; Kezar, 2014), willingness to carry out reform (Tummers, 2011, 2012; Weatherly & Lipsky, 1977; Weimer & Vining, 2005), and understanding of what

can be achieved through the policy's goals (Acevedo, 2022; Felix, 2021a). This focus on actor meaning making extends to the researcher as well, requiring scholars to reflect on their own interpretations and worldviews in the process of examining implementation (Yanow, 2007). This is especially important from a Culture-Cognition approach since studies have documented how new ideas and change strategies brought on by educational reform are at times misunderstood by individuals as familiar and tend to interfere with achieving the policy goals being introduced (Spillane et al., 2006). Just as the policy scholar examines how institutional actors understand required change, it is helpful to assess the researchers' own assumptions on how they interpret policy and what they plan to document in the implementation process.

Third, the study of implementation in this school of thought shifts to situation-specific cases deemphasizing the need to be generalizable and instead allowing more interpretivist approaches that examine the process as one that is intertwined between policy goals, actors' beliefs, and organization conditions. Spillane and colleagues (2002) add that within policy implementation research, most conventional theories fail to take into account the complexity of human sensemaking, both individually and collectively. Finally, by understanding factors such as culture, cognition, and context, this school of thought goes beyond simplified implementation analysis to understand how policy enactment is influenced by individual actors, organizational arrangements, and the culture(s) in which policy mandates are trying to permeate and change.

Frameworks within the Culture and Cognition and the Role of the Implementer

Scholars have moved towards new research perspectives that consider cultural and cognitive aspects of implementation that include sensemaking approaches (Chase, 2016; Coburn, 2001; Spillane et al., 2006; Spillane et al., 2002; Weick, 1995), interpretive analysis (Yanow,

2000, 2007), discourse analysis (van Dijk, 1997; Winkle-Wagner et al., 2014), sociocultural analysis (Stein, 2004; Sutton & Levinson, 2001), multilayered contexts (Felix, 2021b; Nienhusser & Connery, 2021) and social construction of policy targets (Schneider & Ingram, 1993; Schneider et al., 2014). The focus of these perspectives helps us to uncover the "complex social processes" between policymakers, implementers, and assumed policy beneficiaries (Koyama, 2015, p. 548). Specifically, this school of thought helps to illuminate how settings and people influence policy implementation (Chase, 2016; Spillane et al., 2006) given the emphasis on the roles of institutional context (e.g., institutional history, culture) and individual cognitive elements (e.g., prior experiences, beliefs, identities) that influence how policy is understood and subsequently implemented.

With a focus on the "settings," implementation researchers have highlighted how organizational bureaucracy, institutional culture, and campus history serve as impediments or catalysts for achieving the intent of reform. In her examination of culture, politics, and policy interpretation in a Wisconsin community college, Chase (2016) found that institutional identity and history played a significant role in influencing policy implementation. Employing an in-depth policy case study, organizational elements were described as the "DNA" (Chase, 2016, p. 971) of an institution and helped to explain why institutions operate and respond to policy mandates in different ways. In the case of expanding their institutional mission to serve transfer-oriented students, the organization's founding mission as a "technical college" served as the rationale for resisting mandates to expand course offers related to liberal arts and transferring. Similarly, Trujillo (2013) used the concept of a "zone of tolerance" (p. 543), adapted from the work of Oakes and colleagues (1998), to explore the implementation of equity-oriented instruction policies in California and found that district-level bureaucracy and leader's

entrenched practices acted as a buffer to nullify the required changes that sought to benefit students.

The spotlight on the individual actor also allows for a deeper understanding of how implementation is shaped at the local level, especially by the meaning-making of individual actors regarding the intended change. A key approach to understanding the implementer has been through sensemaking theory (Spillane et al., 2002; Weick 1995) and exploring how individuals' pre-existing beliefs, experiences, and knowledge combine into a frame of reference from which they understand, interpret, deconstruct, and respond to the intended policy (Coburn, 2001). Based on this individual-level meaning-making, Nienhusser (2014) described implementers as "powerfully influential intermediaries" (p. 16) between policy goals and the gains to be made by marginalized students. In their work exploring the implementation of policies affecting undocumented students, Nienhusser (2018) found that implementers draw on their personal identities, experiences, and positionality to advocate for implementation that expands educational opportunities. Individual actors carry a responsibility to interpret complex policies and consider how the mandated change can be used as a tool to improve conditions for marginalized students.

Critiques of Culture and Cognition

The Culture and Cognition school of thought enables policy researchers to capture complexity in the implementation process and highlight the critical role of people and place. One critique of this approach is the short-length studies that take a snapshot of the process, rather than the traditional long-term view. Policy research suggests that analyzing policy reforms takes several decades to identify and track policy cycles and their ability to produce changes (Heck, 2004; Mazmanian & Sabatier, 1989). With a focus on depth over breadth in interrogating

organizational context and individual characteristics, scholars within this school of thought may be less interested in longitudinal implementation studies. Additionally, others argue that there is a lack of conceptual clarity around concepts like organizational culture, institutional context, and individual meaning-making (Chase et al., 2021; Coburn, 2001; Eddy, 2003). From this perspective, it may be hard to understand the impact and influence of a policy when the central construct is ambiguous or difficult to measure (Scribner et al., 2003). In addition to these critiques, more critical scholars argue that interpretive approaches fail to recognize key elements that influence policy formulation and implementation (Apple, 1992) such as power dynamics, the role of social production, and oppressive structures like racism, sexism, classism, and homophobia.

Critical-Emancipatory

The third school of thought brings critical and emancipatory perspectives to policy implementation research. The critical approach to policy analysis emerged as a critique of reform efforts that failed to improve the lives and conditions of marginalized communities (Apple, 1982; Apple & Weis, 1983; Ball 1994, 1997). Critical analyses went beyond rationality and interpretivism, examining power, ideology, social reproduction, and policies under advanced capitalism. These approaches explicitly explore racial, social, and economic arrangements and practices that policies and analyses tend to ignore (Anyon, 2005). Heck (2004) suggested that critical perspectives go against the grain of conventional theories, models, and methods of analyzing policies. Rather than assuming an "anti-" approach, critical perspectives provide a new lens by which to understand the policy process, often attending to voices that are typically silent or missing from policy analysis (Martinez-Aleman, 2015). As more women and scholars of color

have entered the field of policy analysis, new theories and frameworks have been developed and employed to explore, deconstruct, and critique the policy process.

Key Elements and Assumptions

The Critical-Emancipatory school of thought deviates from traditional policy analysis, especially in higher education, which neglects the pervasiveness of racism, sexism, and social inequities embedded within the policy process (Heck, 2004; Marshall 1997; Young & Diem, 2017). Within this approach, the researcher seeks to interrogate how existing power structures influence the ability of policy to achieve its equitable intents via the implementation process. Drawing on Young and Diem's (2017) synthesis of Critical Policy Analysis, there are five key elements that the Critical school of thought concerns itself with.

The first is a focus on discourse, highlighting the differences between policy as text and policy as reality (Ball, 1991, 1993). Young and Diem (2017) note that critical approaches to implementation must contend with the gap between the rhetoric and promise of policy and what actually occurs at the institutional level. Second, is the recognition that policy—its problem identification and proposed solution—is directly shaped by people who often have differing perspectives on the root causes of inequities and the type of policy alternatives necessary to make change. Scholars must question the policy itself, who developed it, the type of language used, the framing of the problem, as well as the ideology underlying the policy solutions (Felix & Trinidad, 2020). Third, policy is seen as a practice of power, where influence, resources, and knowledge are distributed unequally (Levinson et al., 2009). This school of thought highlights how the policy process creates "winners" and "losers" (Young & Diem, 2017, p. 4). The researcher must then ask how this policy is written, and who it seeks to benefit, harm, or render

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invisible once implemented. Fourth, scholars using critical approaches need to explore how ideologies and values are embedded in policies and the ways that they potentially reproduce inequalities in society (Alemán, 2007). At times, a policy may be performative, punitive, or full of possibility; it is up to the researcher to explore how the formulation and implementation of the reform would affect minoritized communities. Lastly, this type of implementation analysis centers not just on the production of knowledge, but also institutional change. Neumann and Pallas (2015) share that researchers using a lens of criticality to analyze policy, focus both on developing policy knowledge and addressing matters of social and educational equity.

Grace (1984) presents the idea of "critical policy scholarship" (p. xii)—policy analysis that is theoretically and socioculturally situated and generative of social action (Lipman, 2002). The focus is on understanding the policy intent and effects of silenced groups (e.g., women, people of color, LGBTQ+). The goal of the analysis is to uncover dimensions of power, oppression, and racism. Feminist scholars critiqued the long-standing gender-neutral stance of policymakers (Allan et al., 2010; Bensimon & Marshall, 1997; Young, 1999). A Feminist approach grounds the study of policy within critical theory and focuses on the impact of policy on populations frequently overlooked, namely women and women of color (Allan et al., 2010; Lester, 2014). A critical and emancipatory approach requires the examination of "silence" in policies, or what could have been written, but was not (Martinez-Aleman, 2015). In emphasizing how policies are written, what language is used, and who and what is left out, CPA suggests that even policies that strive to promote equitable outcomes for all students are inherently biased, benefiting some while disadvantaging others. Similarly, these approaches see the analyses of policies as a way to dismantle statutes and laws that have adversely affected marginalized

communities and offer policymakers policy alternatives that may improve the conditions for these communities in areas like education, healthcare, and housing (Dumas, 2014).

Frameworks Within the Critical-Emancipatory Approach and the Role of the Implementer

Approaches within the Critical-Emancipatory school include feminist frameworks (Allan et al., 2010; Bacchi, 1999; Bensimon & Marshall, 1997; Young, 1999), critical policy analysis (Young & Diem, 2017), critical theories (Anderson, 2012; Ball 1997; Dumas & Anyon, 2006; Harper et al., 2009; Iverson, 2007), and racialized organizations (Gandara et al., 2023; Lerma et al., 2019; Ray, 2019). Dumas and Anyon (2006) used political economy to understand the "(non)implementation" (p. 162) of school finance reform brought on by *Abbott v. Burke* in New Jersey in the mid-1990s. They highlight several non-implementation lessons such as the inability of policy mandates to influence behavioral changes, especially among affluent communities. Additionally, they found that finance policies that fail to acknowledge historical context, previous economic policies, and discourse around race would undermine any goals of finance equity during implementation. A critical approach reminds researchers that the policymaking process is not neutral and that the intentions of reform being enacted may not be well-intended or actually benefit minoritized communities (Rodriguez et al., 2021).

More recently scholars have applied Victor Ray's (2019) Theory of Racialized Organizations (Gandara et al., 2023; Liera & Hernandez, 2021; McCambly, 2023; McCambly & Colyvas, 2022; Rodriguez et al., 2021) to understand the racially curious effects of the policy process in higher education and why implementation efforts do not yield espoused goals of educational equity. Using Bonilla-Silva's (2003) racial frames and Ray's (2019) theory of racialized organizations, Liera and Hernandez (2021) studied the adoption of new hiring

practices to improve faculty diversity in higher education. They found that search chairs served as the lead implementer of diversity hiring policies since they heavily influenced if these new mandates were followed. In particular, they noted that implementers' race/ethnicity and disciplinary background heavily influenced the adoption of or resistance to policy efforts seeking to improve racial equity within the university.

Similarly, Gandara and colleagues (2023) examined "racialized administrative burdens" (p. 7) and how entrenched organizational practices and routines may be the institutional roadblock in front of implementers, which limits the effective implementation of policies that can benefit minoritized students. Studying philanthropy and higher education, McCambly and Colyvas (2022) noted that equity-based policies with weak theories of change can "unintentionally, create new and more deeply institutionalized modes of reproduction" during implementation if scholars don't recognize how historically white-serving organizations reshape the intents of reforms (p. 23). Scholars over the last two decades, but especially since the COVID-19 pandemic, have amplified calls for racial justice using perspectives from the Critical-Emancipatory school of thought to place greater analytic focus on interrogating the systemic role of race, gender, and power asymmetry in the implementation process. Through this school of thought, scholars do not just seek to document the enactment process but employ critical and emancipatory frameworks to illuminate and disrupt the mechanisms of inequity experienced in implementation. In this way, research on the implementation process can directly benefit the individual actors carrying out the work to understand the systemic and organizational factors that influence how policy unfolds in community colleges.

Critiques of the Critical-Emancipatory Approach

At times, approaches within the Critical-Emancipatory school of thought were described as reactive and solely providing critique, failing to offer recommendations for better policy formulation or ways to improve the implementation process (John, 2012). Anderson (2012) describes this as the "bridge still too far," where critical policy analysis is unable to connect with policy knowledge that informs institutional practice, improves policy formulation and implementation, and contributes towards scholarship (p. 141). Heck (2004) adds that a critical approach can help understand what is wrong with policy implementation but fails to offer concrete actions that can be taken to alleviate a social issue. By taking a critical perspective, the implementation researcher must consider how they are working not only critiques policies, interrogates systems, and advances the field, but also provides implementers themselves with insight and tools that help them to enact policy reform that achieves more equitable results.

Towards A Different Approach to Policy Implementation Research

Each of these schools of thought provides differing perspectives that guide scholars' exploration of policy implementation based on underlying assumptions, key elements emphasized, varied prominence of the individual, and the purpose for why the researcher is conducting their study. Rational-Scientific places a high value on simplifying the implementation process and allows the researcher to use models and stages to explore how policy unfolds over time and across institutions. Culture-Cognition perspectives ask scholars to recognize that individual meaning-making, as well as organizational context, plays a significant role in understanding, responding to, and adopting reform mandates. Critical-Emancipatory approaches prompt scholars to interrogate why celebrated policies that espouse goals of improving student success tend to fall short of expectations and highlight the mechanisms within our institutions

that restrict the achievement of more equitable outcomes through the implementation process. When seeking to explore and understand the process of implementation each of these schools of thought alone fails to capture the complexity of how reform unfolds within higher education. What is required of policy researchers are comprehensive perspectives that embrace the messiness of human beings and how they interact to carry out reform mandates, consider how individuals come to understand and imagine the possibilities of policy, and ultimately the forces that shape, if and how policy intents can be leveraged to create more equitable institutions through implementation. Drawing from our synthesis of implementation studies and the three schools of thought, we present six tenets in the next section to humanize how scholars conduct policy research on the people leading and implementing reforms in higher education.

Humanizing Implementation: Towards an Equity-Centered Approach to Policy Analysis

From the beginnings of policy implementation research, white scholars (Bardach, 1980; Derthick, 1972; Moynihan, 1970; Pressman & Wildvasky, 1973, 1984) have written about the process in pessimistic, deficit-oriented ways that frame the complexities of policy enactment as failures and misunderstandings. Combating pessimistic views in policy implementation within education, Milbrey McLaughlin (2006) famously highlighted how scholars of policy implementation conduct "misery research" due to the "litany of failed expectations, dashed hopes, and misjudged implementation" occurring during the process (p. 4). Rather than dwell on the discouraging accounts from the 1960s, 1970s, and 1980s, she tried to give policy scholars a path forward, shining light onto the obscure and unknown aspects of how public policy moves from ideas at state capitals to the college campuses where policy implementation is enacted by multiple and diverse stakeholders. The "lessons learned" in Milbrey McLaughlin's (2006) conclusions were offerings to the field in hopes that a new generation of implementation

researchers could bring new perspectives to fully understand the comprehensive and complex nature of implementation, especially in education.

In the early 2000s, researchers used new theories and tools to place greater attention on cognition (e.g., motivation, sensemaking, social construction), context (e.g., temporality, geography, spatiality), and complexity (e.g., power dynamics, shared governance, multi-level politics) to highlight the varied ways that policy reform is interpreted, responded to, and used to achieve its anticipated change (Chase, 2016; Coburn, 2001; Spillane et al., 2002; Spillane et al., 2006; Yanow, 2006). More recently, scholars have used critical theories and methods to uncover institutional and societal mechanisms that maintain inequities despite policies seeking to disrupt patterns of inequity during the implementation process (byrd, 2022; Gonzalez & Cataño, 2022; Kwyasee Wright et al., 2023). Rather than continuing to document the ways the status quo is upheld, critical approaches explicitly focus on understanding how issues of power, social reproduction, and systemic inequities are embedded in the policymaking process and must be centered in any analysis of how educational reforms are formulated and implemented in higher education (Johnson et al., 2022; Martinez-Alemán et al., 2015; Young & Diem, 2017).

In this section, rather than advocate for new tools or theories to help implementation researchers, we argue that the policy scholars themselves must reflect, reshape, and respond to current social contexts as they study policy implementation. To this end, we invite policy scholars to explore how their social identities, academic training, criticality, and commitments to a just world shape how they see the study of policy implementation. For example, how policy implementation continuously flows and unfolds, and ultimately what can be achieved by people leading the enactment of policy. This equity-centered approach seeks to move us–policy scholars–from a perspective that conducts implementation research as a documentation of failure

and disappointment to one that empowers, provides hope, and humanizes the process of understanding policy implementation and the barriers and opportunities faced by institutional actors in improving educational equity. Drawing on Bensimon's work on equity-mindedness (2005; 2007; 2018), we recognize that policy analysis needs to be identity-conscious, focused on addressing institutional conditions, systemically aware, and attuned to how opportunities such as policy implementation are able to improve racial equity in higher education. Below we outline the six tenets that comprise our Equity-Centered Policy Implementation Framework (see Figure 1) and highlight why policy scholars should explore, deeply consider, and embed these tenets in future implementation studies focused on higher education.

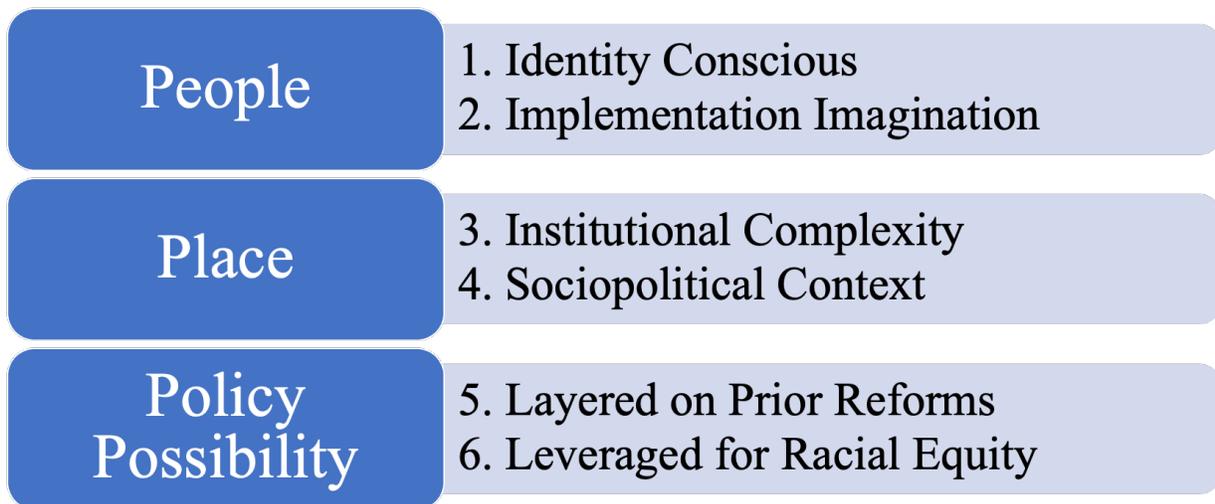| People | 1. Identity Conscious
2. Implementation Imagination |
| Place | 3. Institutional Complexity
4. Sociopolitical Context |
| Policy Possibility | 5. Layered on Prior Reforms
6. Leveraged for Racial Equity |

Figure 1: Equity-Centered Policy Implementation Framework

Within our Equity-Centered Approach to Policy Implementation, we present six tenets that place attention on aspects of the implementation process from individuals' identities and imaginations (people) to institutional complexity and sociopolitical context (place); layering policy elements (i.e., prior reforms and leveraging racial equity) to provide a more comprehensive understanding of the interaction between people, place, and policy. Within the

social sciences, tenets provide a set of principles or beliefs that guide how researchers pursue inquiry and analysis (Rodgers et al., 2023). Our use of tenets offers specific ways to examine policy implementation that places attention on people, place, and policy without being prescriptive (Baber, 2017). As displayed in Figure 1, the six tenets are independent, yet connected conceptual elements that serve to guide policy researchers as they design, conduct, understand, and communicate their implementation studies. While the tenets can be read in a sequential manner, there is no explicit direction or hierarchy within them.

Our approach is multifocal and spotlights the importance of people, place, and policy possibilities in the implementation of higher education policies (Young, 1999). The first set of tenets highlights people, centering on the individual actor—who they are and what they believe they can do with policy—and their influence on how implementation unfolds. To this end, it is critical to start with an awareness of implementers' individual identities and imaginative approaches to carrying out mandates for change and transformation. The second set focuses on place. In doing so, we capture the complexities that exist within an institution, and the sociopolitical context in which an institution is embedded shapes how actors respond to and enact reform mandates. Part of our approach to studying policy implementation is an awareness of prior reforms as they have lasting tentacles into the modern day because of their legacy requirements and cultivating expectations of how things are done. The last set of tenets prompts attention to the policy possibilities. In the fifth tenet, we ask the policy researcher to consider how the policy of interest is layered on top of prior reforms that may create faulty grounds or strong foundations moving forward; recognizing that we cannot study the implementation of current reforms in an ahistorical vacuum. In that vein, our final tenet seeks to understand how the implementer and implementation process are leveraged to improve educational racial equity,

particularly thinking about how individual actors use implementation as a tool for transformative change to address rampant racial inequities.

Identity Conscious

The individual implementer is not a universal figure devoid of their own identities, beliefs, motivations, or commitments. Many theories neglect the critical role of the individual actor and the characteristics they possess (Gandara et al., 2023); beyond their sensemaking, how their identity, agency, and role within the institution mediate what they can do with policy (Nienhusser & Connery, 2021). As we examine implementation processes, scholars must place attention on understanding the implementer and how their social identities like race, gender, and socioeconomic status, all shape how they understand, interpret, and respond to the mandates of educational reform. In our work, we have sought to humanize the implementer by recognizing that who they are, how they are perceived, what they believe, the institutional capital possessed, and their understanding of what can be achieved under the policy mandates all influence how they lead the enactment process on campus and the type of support or resistance they receive in moving policy into practice (Felix, 2021a, 2022; Nienhusser 2014, 2018).

The first tenet calls on implementation scholars to be identity conscious and consider how the social identities and lived experiences of institutional actors structure the possibilities of what can be achieved with policy reform. For example, if policy scholars are examining the implementation of Diversity, Equity, and Inclusion (DEI) efforts to increase the retention of racially minoritized students and colleagues in community college, would the experience be the same for a queer Latina dean as that of a tenured cisgender white faculty member? Race and gender, for example, play a clear role in how the leader is perceived on campus and the potential backlash faced as they interact with campus structures to implement a policy. Similarly, the

position held and status on campus, such as an administrative dean versus tenured faculty, will also provide the implementer with institutional capital (Coleman, 1990; i.e., trust, resources, and reputation) to carry the work forward with varied roadblocks. Implementers' ability to highlight and uplift identities and associated rich lived experiences–both their own and that of colleagues– is another important element to highlight in an equity-centered policy implementation landscape (Sánchez et al., 2021).

When studying how policy unfolds on campus, scholars need to consider how personal and professional identities like race/ethnicity, sexual orientation, gender identity, disability, immigration status, educational status, and formal position held enable or potentially restrict implementing actors from carrying out reforms. For example, there is a growing body of evidence that recognizes how BIPOC implementers tend to use policy as opportunities to explicitly address patterns of inequity and to have a greater awareness of systemic barriers on campus since they faced them as students themselves (Estrada et al., 2022; Leon & Vega, 2019). Gonzalez and Cataño (2022) examined how implementers at Hispanic-Serving Institutions embodied the opportunities within Title V grants to improve the conditions and outcomes for Latine/x students. They found that by examining the "ontological, epistemological, and axiological essence" of these leaders, those actors that claimed a Latine/x or first-generation college student identity were more likely to enact practices that were explicit in addressing systemic inequities affecting Latine/x students (p. 6). By being identity-conscious, scholars can illuminate how possessing minoritized identities may place greater levels of resistance on implementers as well as how they leverage their own lived experience into a catalyst for institutional change.

Implementation Imagination

The use of imagination is essential to our second tenet as it centers on the ability of institutional actors to individually and collectively dream of a different "educational world" that moves us from "what is…to what can be" a possible world where students thrive and experience racial equity (Davis, 2003, p. 27; Dumas, 2016). Along this tradition of imagination and freedom-dreaming, we draw on Kelley's (2003) "radical imagination" to remind implementation researchers of the power and necessity of imagination in leading for social and institutional change: "Without new visions, we don't know what to build, only what to knock down" and that in the process of building anew, if we lack that creativity, "we not only end up confused, rudderless, and cynical, we forget that making a revolution is not a series of clever maneuvers and tactics but a process that can and must transform us" (p. xii). We see implementation imaginations as central to leading policy enactment towards more equitable ends and the need to understand if institutional actors can envision something that is yet to be experienced, educational equity. In the community college context, imagination can be seen as the confluence of actors' agency, frame of reference (e.g., understanding of systemic racism, collective action), commitments (e.g., motivation, willingness, advocacy), and creativity that enable them to see and respond to policy reform in more profound ways (Nienhusser & Connery, 2021).

McLaughlin (2006) shares that "organizations do not act, people do" (p. 8); thus, it is critical to emphasize the imaginations of implementers, uncovering what they believe policy can do, what their specific role in the change process is, and ultimately what can be achieved through implementation. A frame of reference—the worldview actors possess—is used to understand how individuals interpret policy and are able to steer implementation efforts in ways that successfully address educational inequities (Dowd & Bensimon, 2015; Felix & Ramirez, 2020;

Spillane et al., 2002). Scholars have previously examined how personal beliefs, professional values, lived experiences, and equity-minded competence guide implementers to fulfill the intent of policy to improve conditions for minoritized groups. Implementation imagination captures how individual actors' desire for change is galvanized into the enactment process and how they see leading reform efforts as an opportunity for institutional transformation.

By highlighting actors' agency in the process, researchers can account for how implementers' frames of reference shape actions and explore how individuals draw on beliefs, values, and understandings to lead change. In the community college context, many have studied the role of "institutional agents" (Stanton-Salazar, 2011, p. 1066) and how those actors use their status, position, and authority to implement reforms that challenge existing practices and structures to better serve minoritized students (Bensimon & Dowd, 2009; Dowd et al., 2013; Nienhusser, 2018). Layered into this tenet are the ideas of willingness and creativity and how both elements allow for implementers to have a more expansive imagination, and significantly alter the trajectory of actualized impact. Tummers (2011, 2012) highlights how actors' attitude toward policy and the level of personal or societal meaning they assign to the reform drives their (un)willingness to implement policy. Creativity explores the disposition of the individual to be inventive in navigating around implementation impediments like institutional backlash, faculty resistance, or lack of organization resources (Ekpe et al., 2023). Taken together, implementation imaginations help policy scholars understand how the implementer acts on their beliefs, commitments, and willingness to carry out complex change efforts and where they see the possibilities and opportunities for equity-centered transformation within policy mandates; or see it as just another reform effort to be implemented in a compliance-oriented way.

Institutional Complexity

Moving from social identity and imagination, we turn to the place of implementation to understand institutional complexity—the organizational environment and conditions—in which implementers are embedded and the space where policy unfolds. This third tenet helps to uncover the institutional conditions, barriers, and pressures that exist when a policy is introduced and the forces shaping how individuals carry out reform during the implementation process. Within this tenet we ask implementation researchers to consider institutions' "DNA" (Chase, 2016, p. 971), the contested organizational terrain (Felix & Trinidad, 2017; Shaw & London, 2001), how community colleges operate as racialized organizations (McCambly et al., 2023; Ray, 2019), and the level of commitment placed by institutions on mandated changes (McNair et al., 2020; McCoy-Simmons et al., 2021).

Scholars seeking a more comprehensive understanding of implementation should consider and document the "DNA" of the institution and how the espoused organizational mission, identity, culture, goals, and demographics of students served, all come together to enable or potentially hinder what the individual implementer can do to move policy reform forward. This is a first step in recognizing the importance of place and how implementation varies from institution based on unique organizational features. Scholars like Bensimon (2004, 2016, 2018) and Kezar (2008, 2014, 2021) make it clear that any study exploring the implementation of equity-oriented policies must examine organizational features to understand the "readiness" of the institution and how organizational culture, leadership, bureaucracy, and politics prompt implementers to respond, reshape, or resist the policy being introduced. With this type of awareness, researchers then have the ability to examine how the organizational terrain where implementation occurs is potentially receptive or resistant to the type of change required

by reform mandates. This approach of mapping the organizational terrain has been critical within the community college context, where scholars examine the varied institutional responses to new state-mandated policy efforts seeking to dismantle longstanding developmental education practices or expand transfer pathways in vocational- and workforce-oriented campuses.

Within this tenet, we also recognize community colleges as racialized organizations that require implementers to navigate entrenched practices and bureaucratic elements that may operate as mechanisms of racial inequity and influence their ability to do their work and advance implementation efforts (Aguilar-Smith, 2021; McCambly et al., 2023). This element is an active approach to interrogating the racialized nature of higher education and the ways that organizational routines and practices may operate to dilute or delay the intent of equity-oriented reforms during the process of implementation. Lastly, we focus on organizational commitment from senior leaders to set the tone, empower, and support the implementers responsible for reform change. If these new policies serve as the blueprint for equity-oriented change, then the organization and its leadership must commit to providing the materials and supplies to build out the envisioned efforts. Material commitments provide the much-needed personnel, funding, and capacity required to turn the symbolic rhetoric of racial equity into reality. Earlier research documents how an absence of organizational capacity, infrastructure, and dollars limit, if not, derail implementation efforts. Ultimately, this tenet provides the researcher with the ability to contend with the ways that the institution diminishes or enables what implementers can do and how organizational conditions like capacity and commitment can supersede the vision, advocacy, and type of transformation individuals want to carry out.

Sociopolitical Context

Our fourth tenet focuses on understanding the dynamics of place (Morrison et al., 2017; Massey & Denton, 1993; Wilson, 2012) within policy analysis and recognizing how individuals and institutions are embedded in a sociopolitical context (i.e., local, regional, state, and federal levels) that shape the response and potential results of policy reform. Whether in elementary (Lawrence-Lightfoot, 1983; Valenzuela, 1999), high school (Hernandez et al., 2022; Tichavakunda & Galan, 2020) or postsecondary education (Harris, 2021; McMillian Cottom, 2016), place has been a critical issue to explore to understand the conditions, trajectories, and outcomes experienced by minoritized students and address the mechanisms that produce those racial injustices. When examining policy implementation, researchers should explore and contend with the social-political context that affects both the individual and institution as implementation unfolds. Specifically, we highlight three elements: external-political forces, geographic context, and community involvement, and the influence of multi-level governance structures. As Payne (2017) argues in their book, *So Much Reform, So Little Change*, the "tendency to discount the social, political environment" (p. 172) in the implementation process is a shortcoming of policy research and the ability to document the impact of reform efforts on schools and students.

Anderson (2012) reminds higher education scholars that "the formation and implementation of policy are intensely political, based on pragmatic compromises as well as careful and, at times, manipulative language" that must be considered when conducting policy analysis, but often, "we ignore them at our peril" (p. 141). This tenet is one where we choose to acknowledge and embed, whenever possible, the social-political forces that serve as undercurrents swirling below the surface that push against or advance the implementation

processes. For example, we might ask what resources individuals and institutions have to successfully implement reform, both in terms of inducements directly provided for the specific policy as well as the type of capacity available based on the state-level funding patterns. At the state level, Taylor et al (2020) examined hyper-partisanship and its influence on higher education policy across states, helping to understand how colleges and universities are funded to achieve their mission of serving students and the reforms placed on them. They found that community colleges in Republican-led states experienced lower rates of state appropriations and added levels of accountability for those resources. This adds to the historic patterns of funding inequities based on state and system funding formulas that tend to provide less to community colleges (Dowd, 2003; Romano & Palmer, 2016). These external political forces then shape the environment, infrastructure, and resources available for the individual implementer based on the community and context in which their institution is embedded.

Second, policy scholars can provide a more comprehensive analysis of implementation by documenting the geographic context of implementation, and how, for example, rural, urban, and suburban spaces create material consequences for implementers. Embedded in these spaces are remnants of segregation, redlining, and differing economic opportunities that influence the magnitude of inequity and what implementers can do to use reform to address those educational inequities on their campuses and the context they are situated in. Studying the implementation of in-state resident tuition for undocumented students, Nienhusser (2018) found how geographic context offered distinct examples of equitable or exclusionary approaches to implementing policies that benefited or harmed undocumented students in states like California and Georgia, respectively.

Lastly, we recommend scholars think about the influence of governance structures on policy implementation in community colleges. As Morgan and colleagues (2023) argue, governing boards and trustees are "the stakeholders with the most legal power and responsibility for institutions, [but] do not have a strong record of contributing to equity work" (p. 2). These boards tend to act as "bottlenecks" of implementation, where the politics of governing boards dictate what individuals can do based on their receptiveness to external reform (p. 16). Potential misalignment between the intentions of equity-oriented reforms and the values of a governing board tend to constrain and impede activities that seek to advance equity and should be examined when exploring how policy unfolds in community colleges and the potential impact of these reforms. This tenet becomes much more critical to incorporate as states (e.g., Florida, Missouri, Tennessee, Texas) and communities increase the banning of diversity and equity initiatives and limit the use of allocated resources towards these endeavors. Over the last several years, news articles capture the restrictions on implementing equity efforts such as the move to "defund diversity" in Tennessee as of 2016 or more recently Texas' SB-17 where DEI offices, employees, and services are prohibited as of September 1, 2023. All policies are political; researchers studying the enactment of policy must consider who has the power to craft reform, how they frame the educational problems being addressed, and the solutions identified and associated with them. We assert that policies can be promising in addressing educational inequities, but at the same time performative, or at worst punitive; in conducting equity-minded policy analysis, the researcher must be interested in *what* is being implemented as much as *how* it is being implemented.

Layered on Prior Reforms

As policy scholars, we tend to enter the field wanting to study a single reform effort to understand how the implementation process unfolds and what the potential impact of the policy is. Many times, our perspectives fail to capture the reality of community college leaders that are managing multiple policy demands at the same time. This fifth tenet asks researchers to consider implementation within the existing policy landscape and how the policy of interest is layered on prior reforms; some that might complement and build on one another, others that unintentionally overlap, or worse may conflict with each other. We must not study implementation in a vacuum that neglects how the historical and current policy environment creates a stable or shaky foundation for institutional actors to carry out reform mandates. This tenet allows the researcher to explore, for example, the existing policy landscape and how current reform rests within it, the multiple reform demands on community colleges limiting policy continuity, which may result in varying levels of implementation fatigue (Miller, 2018) to enact new mandates.

We begin with placing attention on the historical nature of educational reform and the ways these policies create the landscape in which implementers navigate today. For example, in the state of California, there are various equity-oriented reform efforts seeking to dismantle developmental education placement practices that tend to disproportionately impact BIPOC communities, and yet, implementers recognize the need to be race-conscious with implementation but are restricted by existing laws like Proposition 209 that restrict the ability of educators to be race- and gender-conscious in their work. Similarly, scholars ask how current policies can account for or amend the past legacy of racism embedded in our educational system that still actively operates to produce inequitable outcomes. Gill et al. (2017) reminds us of the silent covenants made decades ago that are antithetical to current reform efforts seeking to

ameliorate the barriers and inequities experienced by racially minoritized students. For researchers interrogating the process of implementation, it is helpful to consider how current reforms being studied like Guided Pathways, Community College Baccalaureate, and Dual Enrollment complement or conflict with the existing policy landscape and the ways it shapes how policy unfolds.

Second, within this tenet, we highlight the lack of policy continuity and continuous reform demands placed on community colleges. From year to year, there may be different policy priorities stemming from the governor, legislature, system-level office, or local district governing board. This, then creates the dynamic of reform demands from all sides, making it increasingly difficult for implementers to focus on the process of enacting individual policies in robust ways given limited capacity and consistency (Felix, 2021b). Continuity allows for implementers, especially novices, to build expertise and competence in navigating complex change. Policies tend not to account for the time and continuity to understand and respond to mandates and begin the process of implementing intended change. Payne (2017) asserts that successful implementation is not a product of clear directives or adequate resources, but time. In studying K12 school reform, Payne (2017) notes that the single thing educators need to do things differently is more time; "time for key relations to develop, time to change practitioner beliefs, time for professional development, time to experiment… and time for midcourse assessment to refine the implementation process" (p. 172). This holds true in community college as well.

Not only does constant change shift the target for educators, but it also leads to a sense of fatigue towards mandated change and the implementation required to achieve it. Scholars have noted how consistency in government policy led to higher levels of receptiveness and willingness from front-line implementers like teachers and nurses (Tummers, 2011; van Engen et

al., 2019;). For example, van Engen and colleagues (2019) found that when governmental agencies pass reform and allow time for implementation, teachers see it as more meaningful, a legitimate change effort, and personally aligned with the goal of the reform. Policy continuity provides implementers with more time which allows them a period of "incubation" (Polsby, 1984, p. 153) to adopt the idea, build buy-in, and embed it into their own context. On the other hand, constant policy changes "generate resistance among workers," and limit "the efficiency and effectiveness of the policies" which can be detrimental for those asked to carry them out (van Engen et al., 2019, p. 99). This fifth tenet reminds policy researchers that regardless of the actions taken now, there are remnants of prior policies that limit and shadow what implementers can do today. It is our due diligence to examine the existing policy landscape and understand how the policy being studied is layered on prior reform that can advance the intended change, limit its effects, or at worst restrict the ability of implementers to enact the goals of equity-centered reform.

Leveraged for Racial Equity

The final tenet highlights how implementation can be leveraged as a tool for educational equity and the ways that people, place, and policy can converge into an opportunity for institutional transformation. Chase (2016) argues that critical policy scholars need to trace the "implementing actions and non-actions" of individual actors to see how reform can be used as a "possible tool in reducing educational disparities" in community colleges (p. 965). We embed the concepts of equity-mindedness (Bensimon, 2018; Bensimon & Malcom, 2012) and zone of tolerance (Oakes et al., 2005) to help policy scholars understand the conditions that can advance, dilute, or derail the aims and intents of equity-oriented policy. By equity-mindedness (Bensimon, 2007), we mean how the individual and institution are able to a) explicitly name issues of race

and racism on campus, b) use data to drive action, and c) focus on addressing longstanding inequities that reproduce educational disparities, and d) develop strategies that are identity-conscious, culturally relevant, and race-specific along the implementation process acknowledging that specific racial disparities cannot be addressed with generic solutions (Felix, 2021a). Ching (2023) shares how equity-mindedness serves to empower implementers to recognize the existing conditions on campus and actively work to "shift the internal environment" in ways that support robust implementation that may "foster racially equal outcomes and transform the campus to serve, validate, and empower minoritized students" (p. 5).

Secondly, we highlight the need for researchers to understand the enactment zone in which implementation can occur and the possibilities within that zone. Prior studies have used concepts like the "arena of policy implementation" (Bressers & de Boer, 2013; Leon & Vega, 2019; Nienhusser & Connery, 2021, p. 617) "contested terrain" (Felix & Trinidad, 2018, p. 862; Shaw & London, 2001, p. 109), "zone of mediation" (Trujillo, 2013, p. 535), and "sites of struggle" (Dumas & Anyon, 2006, p. 151) to outline the various forces that underlie the "support, resistance, or apathy" (Oakes et al., 2005, p. 287)for mandated change. The prior five tenets allow researchers to connect how individuals within institutions are nested in diverse social contexts and policy legacies that shape what can be done with equity-oriented reforms. We use the zone of tolerance as the conceptual tool to understand the latitude that is given to the local implementer to carry out reform and map the forces that enable or restrict an individual's agency to use reform in equity-minded ways. Exploring race-conscious implementation, Felix (2021b) showcased how the convergence of political, organizational, and individual factors, allowed implementers to interpret and respond to policy in ways that explicitly targeted Latine/x students and the inequities they face. In mapping out the zone of tolerance, policy researchers

can uncover the environment's receptivity to race-conscious and equity-minded approaches to implementation. The focus of this tenet then is to explore how local actors stay committed to implementing policy in transformative ways and identifying the conditions and contexts they are nested in that create a window of opportunity to successfully carry out the ambitious goals of educational reform.

Equity-Centered Policy Implementation Tenets Summary

The equity-centered approach to policy analysis offers an expansive view of the implementation process for policy scholars and layout six tenets to examine the inter-connected and multi-layered aspects of implementation, to see *if* and *how* people, place, and policy can be leveraged as a tool for action. The tenets described above asked the policy researcher to consider and expand their approach to studying implementation and shift to a comprehensive look at how implementing actors leverage policy for educational equity and the conditions that allow for it. Hurtado (2015) reminds us that scholars have been socialized to select paradigms and worldviews that "distance them from the topics or communities that are the focus of research," which tends to decouple research from action (p. 285). Similarly, in much of our policy analysis, we study what is easy to see, like a floating iceberg in academia, the focus is on the tip above the surface, but there is so much going on underneath that influences implementation. Through an Equity-Centered approach, scholars can examine how implementation is leveraged as a tool for educational equity and the ways that policy, people, and place can converge into an opportunity for institutional transformation. In our work, we have not only focused on scholarly inquiry as academics but also scholarly instigation, which seeks to actively use our own research and insight to support implementers with tools and resources to achieve the lofty intentions of equity-oriented policies. As Bensimon (2007) states, it is our responsibility as scholars to conduct

"socially conscious research and develop [the] tools institutions of higher education need to produce equity in student outcomes." As we conclude, the final section shares implementation stories from our own research that help bring these tenets to life and showcase how they provide a richer and more complex understanding of how education policy unfolds in community college and the ways individuals shape the trajectory and impact of these reforms.

Implementation Stories

In this section, we provide implementation narrative stories from our research on how community college implementers understand and enact the previously described equity-centered approaches to policy implementation tenets. We follow the tradition of other policy researchers who have used narrative stories to provide a "fuller picture" (Fischer, 2003, p. 161; Schlaufer, 2018) of policy analysis, including the implementation process through the rich lived experiences of community college implementers.

These implementation narrative stories allow us to illuminate how policy implementers come to understand their complex role as implementers of federal, state, systems, local, and institutional policies, especially in relation to addressing persistent educational inequities for minoritized communities in community college. This section begins with a brief description of the context where our scholarship took place, community colleges in California (California Community Colleges) and community college in New York (namely from the City University of New York [CUNY]) as well as a description of the research projects where these data came from. Afterward, we include empirically based narrative stories from community college implementers to illuminate how they understand and incorporate the six tenets comprising the Equity-Centered Approach to Policy Implementation Framework in their work.

Community College Contexts

In this section we provide a brief description of the two contexts, California Community Colleges (CCC) and City University of New York (CUNY), that the coauthors use from their past research to illustrate the previously described tenets within the areas of people, place, and policy possibilities. We begin with a description of CCC followed by CUNY.

California Community Colleges (CCC)

The CCC is the largest system of higher education in the U.S. with over 116 individual campuses embedded in 73 districts that serve over 1.8 million students. As the open-access segment of the state's higher education system, they enroll and support nearly any and all students, from middle schoolers in dual enrollment programs, working parents seeking a career certificate, to those looking to transfer out to attain a bachelor's degree and beyond. Of those students, three-quarters are BIPOC enrollees, 0.33% American Indian, 2.0% Filipino, 4.0% multi-ethnic, 5.0% Black, 12.0% Asian or Pacific Islander, and 46.0% Latine/x. As a system, the CCC seeks to provide "life-changing opportunities and a clear path to [students] goals, whether it's transferring to a four-year university or seeking the job-training skills that can help [them] move up the career ladder" (California Community Colleges, n.d., para. 1). CCCs tuition is set at a $46-per-unit fee by the system's Board of Governors which oversee policy decisions and guidelines.

Over the last decade (2013-2023), major system-level reforms have been enacted to improve the conditions and outcomes in community college, including an overhaul of matriculation and onboarding processes, elimination of assessment practices and forced placement into developmental education, adoption of the guided pathways framework, expansion of student equity initiatives, creation of guaranteed transfer degrees, development of community

college baccalaureates, revision to its role in developing the state's strong workforce and career needs, as well as a new funding formula, among other reforms. The data presented in the implementation stories draw from a research project spanning six years (2017-2022) across five institutions that explored how community college leaders understand, respond to, and carry out policy implementation related to the reforms listed above. Specifically, this project focused on learning how implementers used policy reform in race-conscious and equity-minded ways to explicitly address racial disparities. A total of 10 community college leaders (i.e., 4 deans, 3 faculty, and 3 classified professionals) are included in the CCC implementation stories below.

City University of New York (CUNY)

CUNY was founded in 1847 as the first free public higher education institution in the US. CUNY is the largest urban public university composed of 25 colleges and schools located within New York City's 5 boroughs. In Fall 2021, over 243,000 students (across all degree and non-degree programs) were enrolled throughout CUNY (CUNY, n.d.). Seven institutions are 2-year, and in Fall 2021, enrolled over 73,000 students across its certificate, associate, and non-degree programs (CUNY, n.d.). The enrollment in CUNY's 2-year institutions is 32.3% of the state's entire community college enrollment (New York State Education Department, n.d.). CUNY's 2-year institutions are largely responsible for providing postsecondary educational opportunities to minoritized populations (Bailey & Weininger, 2002). In Fall 2021, the racial/ethnic community college enrollment was American Indian 0.4%, Asian or Pacific Islander 17.8%, Black 30.4%, Latine/x 35.9%, and white 15.5%.

CUNY's academic year 2022-2023 tuition rate (full-time) for a New York City resident was $2,400 per semester, compared to $3,465 at 4-year institutions (CUNY, 2023). A Chancellor

and the system's administrative offices (typically referred to as CUNY Central) govern CUNY's individual institutions, including its community colleges.

The CUNY data presented in this section is part of a larger investigation examining how higher education institutional agents make meaning of their role as policy implementers by supporting and implementing policies that shape the college access of minoritized communities (i.e., racially-/ethnically-minoritized and lower-income). A total of 10 community college officials (5 senior-level access program, 2 senior-level institutional research, 1 senior-level enrollment management, 1 mid-level access program, and 1 mid-level financial aid) were interviewed between 2021 and 2022. Next, we provide a summary of how the Equity-Centered Policy Implementation Framework tenets were evidenced in the work of CCC and CUNY implementers.

Equity-Centered Implementation Tenets in CCC and CUNY

In this section, we provide a summary of how the six equity-centered policy implementation tenets were present in both systems–CCC and CUNY. Table 2 includes the six tenets and a brief description of how each tenet was evidenced in the work of CCC and CUNY implementers. We include this table to transmit the prevalence of these tenets across system and institutional contexts as well as how some elements of the tenets are evidenced within CCC and CUNY similarly (e.g., social identities), at times slightly different ways (e.g., agency and frames of reference), and differently (e.g., implementer interactions; present at CUNY but not at CCC). The elements presented in Table 2 are not an exhaustive list of elements, instead, they provide a glimpse of some of the complexities that community college implementers face as they center equity in their work.

In the next section, we share in-depth implementation narrative stories of how CCC and CUNY implementers came to understand and enact policy implementation in their work. Given space limitations, we opted to include three implementation narrative stories from CCC and an equal number from CUNY. For CCC we include implementation stories on the following tenets: implementation imagination, layered on prior reforms, and leveraged for racial equity. Meanwhile, for CUNY we include stories on the following equity-centered policy implementation tenets: identity conscious, institutional complexity, and sociopolitical context.

Table 2. *Equity-Centered Policy Implementation Tenets' Presence in CCC and CUNY Implementers*

Tenet	CCCs	CUNY
Identity conscious	● *Social identities:* Implementers drew on their identities as cultural intuition to understand and use policy in ways that minimized their experiences with barriers in higher education as first-generation, community college transfer, and financial-aid-receiving students.	● *Social identities*: Rich intersectional social identities informed their work as policy implementers; *identities* included: racially/ethnically minoritized, grew up in lower-income household, first-generation student (i.e., high school and college), attended community college, first- or second-generation immigrant, LGBTQ+.
Implementation imagination	● *Agency*: Actors felt empowered to push forward their equity agenda and implement the policy in ways that aligned with their vision of a more racially just campus. ● *Frames of reference:* Having implementation leaders involved in social justice movements and who identified with the experiences of marginalized communities was essential to recognize ways to use reform as a social movement on campus to mobilize people and change inequitable structures and practices.	● *Agency:* Implementers described a *constrained agency*–how central their influence and role is in implementing policies, yet their level of agency in implementing policies as "limited." Also, implementers noted how the position *they held shaped their level of agency*–entry-level positions described agency as limited since they are required to follow manager directives, stifling imagination. ● *Frames of reference*: Implementers ability to recognize *ambiguity* in policies and leverage creativity to meet specific educational equity-oriented goals.
Institutional complexity	● *Organizational mission, culture, identity:* Implementers shared how they were able to *navigate contentious terrain* on campus by mapping out the organizational conditions, knowing what areas on campus served as allies as well as the potential spaces of resistance that could delay or restrict the intended change being planned. ● *Institutional commitments:* Actors described ways that they would call on the institution's mission and president's priorities of improving equity as a springboard to move their race-conscious approach to implementation forward.	● *Organizational mission, culture, identity:* CUNY and its community colleges strive to address inequities that exist in society and educational systems. Open-access mission of community colleges was highlighted by several interviewees as an essential element in addressing inequities. ● *Implementer interactions*: Implementation work is done in collaboration with others, and those interactions shape the implementation landscape. Interactions included: discussions about which program(s) would be most beneficial for individual students and conversations about ways to achieve greater implementation fidelity.
Sociopolitical context	● *Geographic context:* Implementation leaders benefited from being at institutions that had a large share of BIPOC students which was also reflected in the surrounding community, making it easier to be explicit with how reforms were enacted in ways that directly benefited these students. ● *Governance structures:* Actors described being part of multi-campus districts which reduced the time trustees had to examine their plans for implementation. As long as their budget was appropriately allocated, the governing board didn't push against the race-conscious strategies being proposed and developed to address racial inequity.	● *Systemic barriers*: Understanding systemic barriers (e.g., segregation, discrimination) that minoritized communities must often overcome are an important reality that should be present in their work as policy implementers. COVID-19 exacerbated systemic barriers already faced by minoritized communities.
Layered on prior reforms	● *Existing reform landscape:* Actors discussed how difficult it was to lead implementation when there were overlapping, and at times competition, initiatives being carried out to improve student success. Leaders were able to recognize these overlapping efforts and work to create an integrated implementation approach. ● *Policy continuity:* Implementers described how continuous policy demands decreased their capacity to understand each reform fully, needing to choose between reforms to get involved with and limited time to move beyond compliance approaches to enacting multiple policies.	● *Existing reform landscape*: Implementation of policies does not happen in a vacuum, shaped by and simultaneously shape other policy reforms. ● *Regulatory landscape*: Regulatory and public policies influential in their implementer role was placement testing, remedial education, and income verification or financial aid eligibility.

Leveraged for racial equity	● *Equity-Mindedness*: Actors operated in equity-minded and race-conscious ways, recognizing the need to address systemic issues that create racial disparities on campus and carry out the policy in ways that created evidence-based, culturally relevant strategies that focused on addressing the institutional causes of inequity, rather than deficit-oriented approaches trying to "fix" students. ● *Window of opportunity*: Implementers were able to recognize the "perfect storm," a combination of political, organizational, and individual factors, that created an enactment zone for actors to implement an equity policy focused on Latinx transfer equity, explicitly directing policy dollars to support transfer to four-year institutions.	● *(Mis)Understanding of equity*. While just over half of the interviewees in the CUNY case study had a clearer understanding of (in)equity, the remaining community college officials did not have a proper awareness of that term (e.g., using "equality" to mean "equity" or "equal opportunity for all" perspective).

Being Identity Conscious: A CUNY Story

Being identity conscious entails how higher education administrators bring their social identities and related rich lived experiences into their implementation work. For example, this could be a Latina community college administrator who grew up in a lower-income household and attended a 2-year college reflecting on the barriers she overcame to enroll in postsecondary education, and how these experiences compel them to instigate equity-mindedness in their work, allow for sharing those experiences with students to foster stronger connections with them, and motivate her to contribute and support her Latine/x community. Throughout, community college implementers consistently shared how their identities were instrumental in their work, especially related to addressing educational inequities.

Social Identities. In the CUNY research project, several community college implementers highlighted how their rich intersectional social identities helped inform their work as policy implementers. Some of the identities these officials noted as being especially salient in addressing inequities in higher education included being a member of a racially/ethnically minoritized community, having grown up in a lower-income household, being a first-generation student (e.g., high school and college), having attended a community college, being a first- or second-generation immigrant, and identifying as a member of the LGBTQ+ community. These identities gave these implementers a worldview to understand some of the struggles and barriers these communities must overcome to succeed in higher education and our society. Additionally, some interviewees noted how these identities also provided an entrée for students to feel a greater connection to them given a shared identity and possibly similar lived experiences.

A Senior-Level Access Program interviewee described how they "carry" their intersecting identities and how it informs the work they do.

I'm a first-generation high school graduate. I'm also a community college alum. There's a perspective that I think that I carry with the work that I do. I'm really intentional about not dismissing student concerns, as minute or small as they may come across.

Some of their intersecting identities–first-generation high school graduate and community college graduate–provide a distinct perspective that this implementer is able to bring into their work of supporting minoritized students.

Another Senior-Level Access Program official shared how their identity as a Latina from a lower-income home shaped their work as a community college professional:

I use myself and my own personal experience as an example when I work with students and work with others in the sense of when I was growing up…After getting my bachelors, even my masters, I realized I needed to go back and I need to do better and I need to continue supporting myself and students just like me and I think sharing that with students makes it real for them and they kind of see, like, well if she was able to do it coming from the South Bronx [a lower-income community in New York City] and coming from a family on public assistance…So as far as equity, it might not be equal for a lot of communities, but it's about pursuing and persevering and going through and sharing your story to make it real for others.

This colleague described how her "story" growing up as a Latina living on public assistance in the South Bronx shapes her desire to support students and her practice. Sharing her rich lived experiences with students allows her to "make it real for them" and see a role model in her.

A Black Caribbean-identifying Senior-Level Access Program colleague noted how their first-generation immigrant mother was a pillar of strength that propelled them to pursue higher education:

I came from a Caribbean background, so I always say to people, "Well, I've never had

that thought that I wasn't going to college." It was just, "What college am I going to and

how far away is the college so I can get out of here," because I was raised in a family

where my mom's a first-generation immigrant and she didn't have a college education, a

high school education, but she saw education as being the pathway out of poverty,

elevation, and upward mobility.

This administrator's mother was a strong motivating force that supported their educational

successes. This strengths-based perspective held by this implementer–family members as a

source of educational motivation and support–is an important element to highlight since higher

education systems, policies, practices, and administrators often frame minoritized communitites

from a deficit perspective (Gilliam & Beatty, 2022).

Leveraging Imagination in the Implementation Process: A CCC Story

What implementers see in policies directly shapes the trajectory of implementation and

what can be achieved with the reform mandates. In California, there tends to be wide variation in

how policy is understood and interpreted across the 116 campuses in the state as well as within

each institution based on who leads the implementation efforts. Implementers' imaginations were

shaped by their frames of reference, perceptions of their agency to enact the policy, and ability to

be creative in implementing more equity-oriented changes within the reform.

Frames of Reference. For example, at one campus, the co-chairs overseeing a new

equity planning reform that required colleges to document the extent of inequity for students and

then propose strategies to address these gaps saw the reform as different opportunities. One saw

the equity reform as a procedural task while the other viewed it as a game-changer. The Dean of

Institutional Research, a white man, viewed the equity reform as something that just needed to

"get done" and was largely "inconsequential." He also felt that the kind of equity disaggregation that was mandated by the reform was not new to him because his office did equity gap analyses in the past. He recollected, "We always did these equity calculations, we just knew it as a gap analysis." The Institutional Research Dean minimized the new changes required by the policy and described it as "just another task that needs to be completed." On the other hand, the Dean of Student Services, a Latina, interpreted the student equity reform differently. She saw it as a lever to address racial inequity and social injustice and to transform the campus into one that served students more equitably. The Dean of Student Services recalled:

> I can't believe the state is funding this. Nobody wants to talk about equity. Nobody wants to talk about racial inequality and social injustice and how we can make changes. That's what I was excited about. I thought it was a good time to bring together people, to find people on campus that could unite and really try to push forward the agenda on equity.

The Dean of Student Services, a Latina faculty member turned administrator, grew up in the same area as the community college and strongly identified with the history of Chicanx activism, including the walkouts of 1968 and subsequent protests over unequal education. Reflecting on her long affiliation with college she noted, "It is just surreal that I'm being paid to be here, I'm engaging in a different type of work, but pretty much similar [to community organizing]." Her roots in the community and her "activist mentality" deeply informed her frame of reference and how she understood and responded to the requirements attached to the state-wide equity policy.

Agency. The Dean of Student Services also used the reform as a chance to mobilize folks who were advocating for change on campus and institutionalize new programs and practices that centered on equity. She hoped to create a broad coalition on campus for sustained change. She saw this particular initiative as an opportunity for transformation:

We're trying to take advantage of every moment and every year that we have [this reform in effect] because…it's a game changer…that money attached to the policy helps to create positions or to help develop a resource that can improve equity. And so, I think that equity policy, even if it goes away later, will help us create some sustainable equity projects with impacts and effects on our campus. So, I'm appreciative of, again, being given the opportunity to help facilitate or contribute to leading the effort here.

Another participant remembered the "visionary" role of the Dean of Student Services with, "[she] was definitely the head of our team, she was the visionary, sharing what she wanted to see in this plan, and she brought in people that were passionate about bringing change to our students." Her approach to implementing the equity policy was informed by her identity as a Chicana activist from the same area as the campus, her historical understanding of the policy and original focus on improving outcomes for "ethnic minorities," her ability to recognize the agency embedded within policy implementation to execute her bolder vision, and a race-conscious leadership that prioritized campus enacting efforts that specifically benefited Latinas, men of color, and students of color.

Capturing the Influence of Institutional Complexity: A CUNY Story

Implementers mentioned several elements related to their institutional contexts and associated complexities, and how they shaped implementation efforts that focused on equity. The CUNY implementers described three elements that shaped how institutional complexity informed their implementation work: organizational mission, culture, and identity, institutional student demographics, and implementer interactions.

Organizational Mission, Culture, and Identity. Numerous implementers noted how CUNY and its community colleges strive to address inequities that exist in education and our

society. The open-access mission of community colleges, in particular, was highlighted by several interviewees as an essential element in allowing them to address inequities. As a Black Caribbean Senior-Level Access Program shared, "Being at a community college is essentially the definition of access." Such an institutional mission, as this implementer alludes to, shapes implementers' orientation to develop policies and practices that focus on providing greater educational access to students. Indeed, the presence of a rich array of programs at CUNY community colleges (e.g., College Discovery, Accelerated Study in Associate Programs [ASAP], Advancing Part-time Excellence [APEX]) created a culture of implementing programs that lead toward addressing inequities for minoritized students.

Student Demographics. Most policy implementers cited student demographic data and how that should shape their work. For example, several implementers proudly highlighted their high percentages of racially-/ethnically-minoritized and lower-income students enrolled at their institution. While true, few interviewees gave concrete examples of how they used data to guide their implementation actions to support those specific communities, which may be due to limited resources that often stifle implementation innovation. This lack of reference was especially true when asked about how they attempt to address racial and ethnic inequities in their practice. Interviewees could more easily discuss how they attempt to address inequities faced by lower-income communities.

Implementer Interactions. There was a strong understanding that the work done by implementers was done in collaboration with others and that those interactions also shaped the implementation landscape. Some examples of interactions among colleagues to address implementation issues included: discussions about which program(s) would be most beneficial for students to succeed, conversations about ways to achieve greater implementation fidelity, and

discussions about how to create meaningful internship opportunities that are compensated for students, among others.

These interactions also involved ways to build small coalitions of colleagues to strategize on how to address inequities that impacted minoritized students. A Latina first-generation community college graduate who serves as a Senior-Level Access Program officer, for example, described the importance of fostering trusting relationships with colleagues to address "barriers."

Having relationships on campus with your colleagues, with your supervisors is really critical, because the folks around you can help you understand those policies. Particularly if you're new to a role or there's been change in leadership, how you understand the policies can influence how you implement them. I will often go to a trusted supervisor or colleague and say, "This is the policy, but I think it's creating a barrier. How do we create an avenue? Or this is the policy that I think is working really well, for this particular subset of students. Is there a way that we can apply it to other students? How do we open up more access to this particular policy?" I find that when you have trusting relationships, people are more willing to be honest with you about where those lines are. When you don't have trusting relationships, that is where they just direct you to the policy, and do with it, what you will.

This implementer raises the importance of sensemaking and collective action in addressing educational inequities at their institution. First, they raised the importance of "understanding the policy," including how the policy creates "barriers" or "avenues" for greater access. Having this critical awareness is foundational for implementers to initiate institutional transformation. To have a greater understanding of the (im)possibilities presented by the policy, they work with "trusted colleagues" to form a collective action to address inequities. They highlight how this

collective action allows for seeking guidance and simultaneously obtaining colleagues' buy-in to create organizational change.

Implementation Embedded Within Sociopolitical Context: A CUNY Story

The sociopolitical context is an ever-present reality in the work of higher education implementers, especially in relation to addressing persistent educational inequities. The CUNY story highlights the importance of recognizing the role of systemic barriers such as segregation and redlining in shaping educational inequities in our society.

Systemic Barriers. Four implementers mentioned how the understanding of systemic barriers that minoritized communities must often overcome are an important reality that should be present in their work as policy implementers. A white Senior-Level Institutional Research official, who identifies as a man, noted how our nation's history with and persisting patterns of segregation is an example of what should be considered when implementing policies that address inequities.

> You have the history of segregation. You might say our school is a good example of this. We are in a very segregated environment, 90% plus a minority population. You might say it's a demonstration of our segregation in this country. Where we are, who our students are. It's a demonstration of it. And I think what we want to do is . . . we can't change housing patterns…I've seen articles about how some communities around the country are trying to make students from different socioeconomic levels and now that's probably one of the hardest things to do. Is to integrate school populations.

This Institutional Researcher critically reminds us of the role of sociopolitical elements that are present in our society that should be considered in higher education implementers' work. The example they raise is associated with discriminatory housing patterns that have placed high

percentages of minoritized communities together in their community college locality and as a result made racial integration a significant barrier to overcome.

A Senior-Level College Access Program administrator, who identifies as Black-Caribbean, critically spoke about how racially and ethnically minoritized students' presence on their campus does not mean that these communities still do not encounter "systematic" barriers.

> Just because we're all Black and Brown doesn't mean that we don't have these issues that we really need to address. Because oftentimes it's systematic, right? And we don't really recognize that these policies are not supporting our students the way they should or we think they should.

CUNY community colleges have high proportions of staff and students who belong to racial/ethnic minoritized communities. As this implementer shares, given such demographic realities, may obscure the realities that even organizations that have large numbers of racially/ethnically minoritized members are racialized (Patton, 2016; Ray, 2019). Such a "diverse" organization may see the presence (i.e., access) of minoritized students, while neglecting to implement policies that support their success.

In fact, some interviewees mentioned how inequities were ever-present in their institutions. A Senior-Level Access program official, a Latina, reflected on how,

> institutional racism has been so ingrained in student, faculty, and staff that we don't even see it, right? That, when it's happening, we don't even know what's happening. And I'll tell you, as a student who went through it and didn't even see it, that it was racism…It's been so ingrained in our fabric of what we do, that we are desensitized. Desensitized when it's been done to me as a person of color.

This implementer reminds us of how racism is deeply "ingrained" in higher education institutions, regardless of institution-type (e.g., community college, Historically Black Colleges and Universities) and that administrators often become "desensitized" to how we perpetuate racism and white supremacy (Patton, 2016).

Some interviewees highlighted how the COVID-19 pandemic "exploded" the systemic barriers that minoritized communities face. A Latina Senior-Level Enrollment Management professional described how COVID-19 should have sparked a policy implementation environment that recognized "our responsibility" and a student's "unique . . . circumstance"–an equity-centered approach to policy implementation.

> COVID just made all these little things that we thought were minor within our community just explode and it's also our responsibility to create an environment where it's like I said, to me, equity is where you can address all these things for the student, right? Everybody's different, everybody's unique, and everybody's got a certain circumstance that they are dealing with, or an environment that they live with. And I feel like all the 10,000 students we service are just different. All of them have a different circumstance.

At the core of human- and equity-centered approaches is the prerequisite for implementers to recognize and prioritize the dignity and needs of each individual they serve while also finding a solution to their dilemma (Culver et al., 2022). An understanding of the needs of individuals involves a keen recognition, as this implementer notes, for example, of students' "circumstances" and environments. The sociopolitical realities that envelop minoritized communities are an essential element that must guide the work of equity-minded implementers (Bensimon, 2007).

Studying Implementation That's Layered on Prior Reforms: A CCC Story

Within the CCC research project, practitioners were actively implementing multiple policies related to improving the conditions and outcomes for students under specific reforms like the Student Equity and Achievment Program, the Guided Pathways Project, expansion of Associate Degrees for Transfer, and the elimination of Developmental Education Assessment Practices across the state. Exploring historical and recent reforms that layer and overlap with the specific policy being studied allows the researcher to note the current policy landscape which instituiona actors must navigate and helps to illuminate how certain policies may complement, contrast, or even contradict prior reforms.

Existing Policy Landscape. Within the CCC research project, practitioners were actively implementing policies related to Student Equity, Guided Pathways, Associate Transfer Degrees, and Elimination of Assessment Practices across the state. At the local level, individual actors noted how these multiple reforms need to be implemented in real-time and how each of these initiatives, at times, had competing priorities, divided attention among leaders, and limited the capacity to effectively do the work. A Latina math faculty shared, "I'm co-chair of our equity efforts and guided pathways as well, I feel like I am in two totally different worlds, between what we established as racial equity goals two years ago and what we are just discussing to change in guided pathways." At the same time, this individual shared they would have to choose between leading one workgroup over another given their existing capacity. "I have to drop one of the two initiatives, so my president wants me to lead the implementation workgroup for Guided Pathways, given my experience the last two years with Student Equity." But what she came to realize in this process was the lack of overlap on campus between two reforms seeking to improve the success of students, she noted:

I started to think that each of these was going about it totally different and I didn't want to waste my time. I didn't want to waste time because students need change now, so I advocated for us to start going to statewide trainings and recognize how these reforms overlap or at least be able to do them in ways that complement each other and don't keep us in silos or dilute our time, attention, and especially the resources we need to change that things are not working on our campus.

In community college, things do not stand still, new reforms are introduced, others fall to the wayside, and campus implementers must attend to the demands of these policies. By examining the existing landscape, there is an opportunity to see how community college leaders wrestle with navigating multiple policy priorities and how the context of each institution creates (mis)alignment to build on these prior reforms to address and improve issues of equity.

Policy Continuity

In community colleges, implementers face continuous policy demands, having to sift through reform guidelines, wishing they knew which "policies would stick, and which would be forgotten." Examining policy continuity helps to see how actors are influenced by prior reform experiences and the lessons learned in implementation. One actor shared that they were not sure that the equity policy would last and that in previous years, there were initiatives from the system level that came and went on a frequent basis. The Dean of Counseling elaborated:

I didn't realize the magnitude and the impact [the equity policy] would have on our campus. Before it, we had the basic skills initiative—we had met, and I was a part of that implementing committee at the time. We met on a regular basis. There was some funding. We did some project planning, and then a year later the initiative and the money went away. I didn't think it would be as big.

As the Dean of Counseling added that the continuous policy demands minimized the opportunity to see the policy as a transformation tool on campus:

> Nobody really said what the possibility was in terms of the funding or the capacity of how it can actually change the way we operate on our campus… [and] because we were so used to these soft monies leaving us, we didn't dream big, we limited ourselves think this policy would go away after a year or two, like others.

This sentiment was shared across implementers in the project, they "wished" they could have known that the Student Equity policy would continue since its initial funding to present day 2023, nearly ten years later. Given implementers' histories and experiences with external reform, many assumed that the policy would be short-lived and limited their attention to carrying it out.

A Tool for Action: Leveraging Implementation for Racial Equity: A CCC Story

The final tenet of our Equity-Centered Policy Implementation Framework allows the researcher to explore the actions of the implementer and how they navigate the conditions of the organization as well as the discretion within the policy mandates to create opportunity for change and how they are able to leverage reform mandates as a catalyst for improving racial equity.

Operationalizing Equity. Within the California transfer reform project, most of the interviewees espoused deeper understandings of equity that permeated how the campus utilized the reform to address the specific needs of student groups facing racial disparities, such as Latine/x students and their transfer goals. An English faculty member shared, "I believe equity on campus or in general is about -- meeting students' particularized needs, right. So, if we figure out gaps in achievement, we have to figure out what kinds of resources would help address that specific gap." A classified professional overseeing program for a Latina transfer program noted:

I feel like equity, especially here, is about being race-based. The development of socially-culturally informed and race-conscious policies and practices, programs for specific groups who face long standing persistent, structural, and institutional inequities, like that should be the goal or that should be where we should be at.

Colleagues across this campus shared their conceptualization of equity as being race-conscious, data-driven, and institutionally focused on its approach to improving outcomes.

Seeing the Policy as Shield. Implementers within the CCCs demonstrated how they drew on the mandate language, required data disaggregation, and resources to create interventions as a shield to be race-conscious and address Latine/x transfer inequity. The Dean of Workforce shared that the equity policy was inherently about race and that the campus could leverage the reform to create new programs that address racial inequity. She mentioned, "That's what the equity policy allowed us to do is look at race, because before it was like a taboo. It was like, 'What? You're talking race?' and it's like yeah, look around you. But it wasn't welcomed at all before." Asked if there was pushback on campus for being race-conscious, the Dean replied, "No, it was just so glaring and this is why I'm saying to you that equity gave us that ability to talk about, really talk about these disparities because it was inherent to the charge." At this campus, the largest disparities were found among Latine/x students seeking to transfer and the implementers leveraged the reform to create a race-conscious approach to improving transfer as well as limiting potential detractors seeking race-neutral efforts.

A Window of Opportunity. Lastly, two implementers reflected on why they were able to implement the equity policy in ways that explicitly targeted barriers to transfer for Latine/x students. A student services specialist shared:

[Our campus] has more of a commitment to making sure that Latino students transfer. So, yeah, I mean [our campus] is willing to put resources towards transfer equity. As a group, we had this opportunity, we need to do better at transfer, the president had this as a priority, and we felt empowered to push transfer in the implementation meetings.

Similarly, the Dean of Workforce alluded to aspects on campus that shaped the window of opportunity:

It was a perfect storm. The equity policy was created. You had the right people in place. You had a new president. You had a surge of new faculty hires. You had a shift in academic senate leadership, a shift in union leadership. And the president came on and said yeah, let's improve Latino transfers. And it was like all right; we got this policy, we have these resources; we are all hoping for the same thing.

The words of these implementers described how a deeper conceptualization of equity, the ability to leverage the policy mandates, and aligning campus conditions established a propitious context to implement the equity reform as a mandate to address transfer inequity for Latine/x students. By leveraging the reform for action, implementers reported, "this policy allow[ed] us to change the campus culture and institutional practices to really make sure that we're addressing transfer equity and supporting Latine/x students facing disproportionate impact."

Future Considerations

As we close the chapter, we include future considerations that are important for policy researchers and higher education professionals to consider in search of deeper understandings of how the policy implementation processes can shape educational equity. Namely, we call on policy researchers, policymakers, higher education professionals, higher education associations, among others to consider ways to incorporate these future considerations into their work.

We invite policy researchers, policymakers, and higher education practitioners to use the Equity-Centered Policy Implementation Framework to understand more deeply the role of policy implementation in addressing inequities throughout higher education. While the examination throughout all higher education is of importance, we impel policy scholars to focus their research on community college. It is essential that we study policy implementation within the community college landscape given the large percentages of minoritized students who attend that institution-type (Community College Research Center, n.d.). In other words, if we want to create more equitable postsecondary education systems, the examination of community colleges is essential (Bailey & Smith Morest, 2006). Further, the study and publication of research on community colleges are inadequate (Bragg, 2009; Crisp et al. 2016; Floyd et al., 2016), especially employing strengths-based perspectives (Carales & López, 2020; Davies et al, 2003).

Simultaneously, we encourage policy scholars to engage in research that further develops and strengthens the Equity-Centered Policy Implementation Framework we present in this chapter. For example, should some existing tenets be reconceptualized? What new elements belong within specific tenets? How might this framework be reimagined for specific types of community colleges (e.g., Asian American and Native American Pacific Islander-Serving Institutions, Hispanic-Serving Institutions, Tribal Colleges)? What relations exist, if any, among the tenets?

An example of a tenet we encourage policy researchers to further explore is identity conscious. While in recent years some higher education scholars have examined the role of implementers' social identities and their influence on implementation processes (Felix, 2021a; Nienhusser, 2018, Nienhusser & Connery, 2021), more research is needed. For example, a greater understanding of the lived experiences of Black, Native American, disabled, and their

intersecting identities of higher education implementers is dreadfully needed in the literature. We especially encourage members of those groups to engage in research on their communities while catalyzing their rich identities and lived experiences to inform their scholarship. Unfortunately, higher education leaders have largely neglected the infusion of higher education administrators' identities and lived experiences in their work (Floyd, 2012; Jourian et al. 2015). We encourage a radical shift to value these elements so they may be used to (re)imagine higher education systems and institutions that leverage implementation to achieve greater equity for marginalized communities.

We call for an integration of "radical imagination" (Kelley, 2003, p. 6) with human-centered implementation (Buchanan, 2001; Junginger, 2013) into higher education professionals' practice. Kelley's (2003) radical imagination urges us to develop a "third eye" (p. 2) that allows us to "dream of a new world" (p. 3). With such a vision, higher education implementers can dream of and (re)imagine higher education systems and institutions and implementation processes that center equity. Buchanan (2001) reminds us that human-centered design is "fundamentally an affirmation of human dignity. It is an ongoing search for what can be done to support and strengthen the dignity of human beings as they act out their lives in varied social, economic, political, and cultural circumstances" (p. 37).

Professionals within various higher education contexts can integrate a radical imaginative human-centered approach in their implementation work that allows them to dream of a new higher education that truly affirms the human dignity of minoritized communities. With this framing, we hope that higher education professionals can leverage implementation processes to (re)imagine higher education systems and institutions as liberatory spaces instead of ones that continue to restrain BIPOC and other marginalized communities.

The sociopolitical context has always shaped the higher education landscape (Harper et al., 2009; Ramos et al., 2022). Moreso, systems- and institutional-level efforts related to Diversity, Equity, Inclusion, and Justice (DEIJ) in higher education have always been under attack (Lewis & Shah, 2021; Patton et al., 2019). However, more recently, those assaults have resulted in wins for conservatives who wish to overthrow DEIJ initiatives in higher education in areas such as closing DEIJ offices, eliminating diversity statements in hiring processes, requiring DEIJ trainings, among others (*Chronicle of Higher Education,* DEI Legislation Tracker, n.d.). In 2023, for example, Florida and Texas enacted policies that ban DEIJ centers in public postsecondary education institutions. Further, with the impending Supreme Court decision on the use of affirmative action in college admissions (and perhaps other areas in higher education) the implementation landscape is ripe with anti-DEIJ policies that implementers will be responsible to implement in the immediate future.

With such assaults on DEIJ efforts, it will be imperative that higher education professionals find creative ways to blunt these attacks through policy implementation. In other words, while earlier we argued for the use of policy implementation to achieve greater equity in higher education, we advocate for implementation processes that lessen the detrimental impact that anti-DEIJ policies, for example, will have on minoritized communities. The same ways equity-mined actors can leverage policy for transformation, there is the potential to dilute the harm of punitive and restrictive mandates targeting higher education and minoritized communities. Implementers in states that pass anti-DEIJ policies will be compelled to consider ways to support minoritized students amidst a hostile policy landscape that devalues minoritized communities' existence and needs.

Higher education professional preparation programs (e.g., Higher Education and Student Affairs [HESA], Social Work) and doctoral programs (e.g., Higher Education, Educational Leadership in Higher Education) have important contributions in shaping the understanding of and skills-building of equity-centered policy implementation in the work of current or future higher education professionals and researchers. We encourage the use of our Equity-Centered Policy Implementation Framework of people, place, and policy possibility into academic programs that prepare future higher education scholar-practitioners and researchers. The inclusion of this framework into the curriculum will acknowledge the importance of the intersections of policy implementation and equity in the work of college and university administrators and in the study of higher education. Topics that could be included in the curriculum include uplifting professionals' personal and professional identities in their work as policy implementers, recognizing and leveraging policy vagueness and ambiguity to achieve greater equity for marginalized communities, and understanding and navigating institutional complexity to achieve racial equity-oriented goals, among others. The inclusion of this framework in preparation programs' curriculum aligns with the ACPA–College Student Educators International (ACPA's) Strategic Imperative for Racial Justice and Decolonization that encourages the use of "tools for personal, professional, and career development; and innovative praxis opportunities for members that will actively inform and reshape higher education" (ACPA, n.d., para. 2).

Higher education associations (e.g., American Association of Community Colleges [AACC], Association of Community College Trustees [ACCT], ACPA–College Student Educators International [ACPA], Association of Governing Boards of Universities and Colleges [AGB], Association on Higher Education And Disability [AHEAD], Association for the Study of

Higher Education [ASHE], NASPA—Student Affairs Administrators in Higher Education [NASPA]) have a central role in shaping the discourse on the intersections of policy implementation and equity. These professional associations have the power to uplift narratives, scholarship, and practices focused on equity-centered policy implementation. We call on higher education associations to strengthen members' understandings of equity-centered policy implementation through professional learning series, blogs, and publications, among other forums so its members have a clearer understanding of how policy implementation can transform educational systems and address persistent inequities. Furthermore, these associations have the knowledge and influence to reshape professional competencies in higher education broadly and specific functional areas (e.g., Admissions, Disability Services, Registrar) to raise the importance of policy implementation and equity in the work of college administrators. For example, the ACPA and NASPA (2015) Professional Competency Areas for Student Affairs Educators fails to adequately address the complexity of policy implementation and its role in higher education professionals' practice. A greater focus on implementation and equity in higher education competencies could transform future professionals' understanding and practice in relation to implementation processes and educational equity.

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