

# A Critical Policy Approach to the Federal Policy on Resource Allocation Reviews

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## Abstract

**Purpose:** The purpose of this paper is to examine the intersection of state, local, and federal policy meant to engage school districts around allocating resources for the purpose of supporting high need schools. In this paper, I examined the discord between policy and practice around the enactment of federal legislation centered around resource allocation through a critical policy lens aimed at assessing whether state and local guidance can promote implementation of the federal guidance. **Design/Methodology/Approach:** For the purpose of this study, I reviewed publicly available data across 25 state education agencies and 10 school districts. These districts were randomly selected but a focus was made on reviewing resources for large school districts. In my review of documents, I reviewed federal, state and local guidance on resource allocation pertaining to the Every Student Succeeds Act (ESSA). **Findings:** The analysis identified examples of state and local efforts to guide the implementation of the new legislation. However, the findings also highlight the challenge that exists in implementing federal policy and the impact of those challenges across marginalized communities of poverty. **Research Limitations/Implications:** The findings of this paper may be used as a guidance tool for policy makers and educational leaders as the state and local levels as they continue to seek ways to support marginalized students. The findings have direct implications for current practitioners, parents, community, and state/local school boards.

## Keywords

Policy, Resource Allocation, Student

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## 1. Introduction

School funding remains a critical issue particularly as it pertains to supporting marginalized students. The distribution of funding to schools can be a complex

issue as school systems have limited financial resources with which to advance their goals (Owings et al., 2022). In 2015, Congress passed new legislation designed to assist in the allocation of resources to schools that support marginalized students. The enactment of the Every Student Succeeds Act (ESSA) afforded states more authority and autonomy. Through the ESSA law, States continue to be responsible for improving schools as States are required to reserve 95% of the funds allocated by the U.S. Department of Education funds designated for school improvement (The Every Student Succeeds Act, 2015). The purpose of this paper is to examine the intersection of state, local, and federal policy meant to engage school districts around allocating resources for the purpose of supporting high need schools. In this paper, I intend to examine the discord between policy and practice around the enactment of federal legislation centered around resource allocation. This paper will review the policy through a critical policy lens aimed at assessing whether state and local guidance can promote implementation of the federal guidance. This review will include reviewing state and local education agencies (also referred to as districts) guidance, power points, memorandums, and other publicly available resources designed to support the implementation of resource allocation reviews as determined the enactment of the ESSA legislation.

## 2. Background on ESSA

The ESSA introduced a new provision that requires state education agencies (SEAs) to review resource allocation in districts that serve a significant number of schools identified for continuous improvement and a significant number of schools implementing targeted school improvement plans. The ESSA requires state education agencies (SEAs) to conduct periodic resource allocation reviews (RARs) in districts that serve low-performing schools. Under ESSA, states must conduct resource allocation reviews to support high-need districts. Districts and schools identified for improvement are then charged to take action to address the resource inequities their student face. Furthermore, state agencies had significant flexibility and autonomy to design these reviews, determine what data should be included, and decide how to collaborate with schools and districts to ensure reviews proved helpful as opposed to burdensome. Finally, ESSA was enacted to enable individual states to be accountable for determining their own needs and standards according to their individual context, allowing them the flexibility to develop and implement their own plans to meet those needs (Uzzell et al., 2024). Under the ESSA guidelines, states are expected to effectively use available resources to protect historically marginalized and high-poverty populations. They are required to focus on ensuring equitable education and resources in the areas of school improvement, academic performance, and resource allocation (Della Sala et al., 2017; Knight, 2019; Uzzell et al., 2024).

As noted, under the ESSA states are expected to comply with resource allocation requirements which require states to ensure that all of their students, regardless of their socioeconomic status, are provided with qualified teachers, educa-

tional programs, and other funding necessary to meet the needs of the diverse student population of the state. In short, resource allocation refers to the equal distribution and allocation of funds that considers and enables diverse student populations, including those in low-income and marginalized to communities, to be granted an equal opportunity of attaining student success.

For all states the U.S. Department of Education provided guidance. Additionally, the U.S. Department of Education provided a community of practice designed to bring state teams together to consider available options for designing and implementing a review process that meets the needs of schools and districts (<https://www.ed.gov/teaching-and-administration/lead-and-manage-my-school/state-support-network/cop/resource-allocation-review>).

### 3. Critical Policy Analysis as Methodology

Critical policy analysis refers to a form of education policy studies where the focus is upon exposing inconsistencies between what policy says and what policy does, particularly in the terms of power relationships in society (Diem et al., 2014). Mainly the focus of this work is upon exploring how marginalized groups come to be marginalized through policy and how existing distributions of wealth and capital (economic, cultural and social) are reinforced or perpetuated through policy (Cahill, 2015). Critical policy analysis must locate power in policymaking processes and challenge conditions of inequity (Ball, 1994; Molla, 2021). This type of policy research examines inequities from multiple perspectives (Bodgdan & Bicklen, 2007; Geertz, 2008). Researchers who adopt a critical stance focus on locating power in social practices by understanding, uncovering, and transforming conditions of inequity embedded in society (Rogers, 2004). This critical consciousness challenges assumptions that privilege some and oppress others (Willis, 2008).

There are several areas that are central to my study. First, challenges to the theory and practice of policy analysis have occurred for decades, and critics have been reacting to the record of policy analysis, the lack of a compelling theoretical base, a failure to anticipate unintended consequences, poor utilization by policymakers, displacement by politics, or implementation failures (e.g. DeLeon, 1988). Second is Critical Resource Theory (CReT). CReT is a conceptual framework and a pragmatic orientation useful to identify and remedy inequities and inadequacies in public funding policy and practice (Kaplan & Owings, 2022). As a theory, CReT posits how power imbalances across society advantage those with substantial influence (based largely on access to valued resources) at the expense of those without it. CReT offers the capacity for quantitative and qualitative analyses of publicly funded disparities in resources allocated to high- and low-wealth communities as CReT argues that throughout history, certain persons and groups gained the capacity to wield their social, economic, and political influence to mode their culture, shape their institutions, and enact public policies and practices that benefited themselves and others like them while disadvantaging those unlike them (Ow-

ings & Kaplan, 2024).

#### School Funding and Resource Allocation

Research has supported the importance of school funding on student achievement. Studies find that higher public expenditure per students can reduce student achievement differences between schools, thus reducing the achievement gap between low- and high-income pupils (Jackson et al., 2016). This fact has been supported by the increasing number of school finance reforms over the years. For example, Lafortune et al. (2018) studied the impacts of school finance reforms on student achievement and found that the impacts of increased funding for low-income school districts were immediate, strong, and sustainable.

Research has also pointed to the disparities that exist in school finance. Moreover, the disparity in funding has significantly impacted poor communities and communities of color. Studies continue to show that poor and minority students are concentrated in the least well-funded schools and, are funded at levels substantially below those of neighboring suburban districts (Adamson & Darling-Hammond, 2012). Moreover, school districts with funding gaps are disproportionately made up of low-income and black and Latinx students (Baker, 2017). Many of the disparities, especially those related to public schooling and public-school finance can be tied to the history of racial district boundary gerrymandering and the decades of highly orchestrated racial segregation of American's residential housing stock (Rothstein, 2004).

Disparities in funding also show up in underfunding of schools. Underfunding can be seen across other areas as well. For example, underfunding schools manifests itself in a variety of ways, including less competitive teacher wages, lower test scores, and larger class sizes (Baker et al., 2021). Research shows that the severe lack of money in schools in lower-income neighborhoods impacts a teacher's teaching quality, schools' curriculum, and additional extracurricular activities (Center for America Progress, 2020). Moreover, lack of funding can lead to poorer school facilities, dated textbooks, and larger classrooms for disadvantaged children (Darling-Hammond, 2010; Mosteller, 1995).

While it is difficult to blame all disparities to money, the research indicates that funding and achievement is inevitably linked to student achievement for children of poverty.

Moreover, studies indicate that greater state spending on low-income students leads to improvements in student learning in reading and math (Jackson et al., 2016). Of course, extra money alone is not the answer. Researchers have found that increasing funding, without explicit links to how programs, policies, and practices should be altered or transformed, can be unsuccessful in high-poverty schools (Noguera & Wells, 2011). In their analysis, Noguera and Wells (2011) concluded that several millions of dollars in funds to support schools had virtually done very little to transform and affect the achievement of students in high poverty schools. They cite opportunity and support grants as well as other financial supports from several donors and programs, including Annenberg, the Bill and

Melinda Gates Foundation, and Title I as somewhat innocuous in making huge strides for children living in poverty.

**Resource Allocation.** Resource allocation describes the way in which “fiscal and non-fiscal resources are divided between competing needs and expended for educational purposes (Pan et al., 2003: p. 5) and resource allocation strategy targets connecting resources through professional knowledge and implementation (Adams Jr., 2010). Plecki et al. (2006) identifies the three basic categories of resources, money, human capital, and time, and stress that all resources and resource uses are linked and depend on the others for intended outcomes. Pan et al. (2003) provides additional layers to the types of resources that drive allocation practices targeting student learning, including money, staff, time, additional resources include physical resources and parents and the community. Furthermore, studies suggest that the distribution of fiscal resources plays a pivotal role in shaping the quality of k-12 schools (Baker, 2017). Despite the complexities of allocating resources, research suggests the need to distribute dollars to districts in equitable ways is a first step in providing educational resources for the purposes of educating children (Picus, 2001). Without a focus on equitable distribution of dollars, disparities will exist. As previously stated, the disparities in educational funding profoundly impact educational equity and student outcomes, particularly in low-income districts where resources are scarce (Darling-Hammond, 2013). A critical examination of these dynamics reveals that optimal resource allocation is not merely a matter of balancing budgets but requires a commitment to equity and improved student outcomes. Thus, effective fiscal resource allocation is critical for fostering equitable educational opportunities and prioritizing funding for essential educational interventions and support systems can lead to vast improvements in student achievement (Jamison et al., 2012).

There are several technical and structural challenges to establishing an equity focused resource allocation strategy. As a result, the manner in which funds are distributed directly influence schools and school district’s ability to provide necessary resources support services, and infrastructure (Adamson & Darling-Hammond, 2012). In fact, one of the policy lessons from the realities of inequity in funding is to target additional financial, material, and human resources towards disadvantaged students and schools (Baker, 2018; Herrera-Sosa et al., 2018; Schleicher, 2018). By targeting funding, states, schools, and districts can be intentional in providing early childhood education, develop teachers’ capacities to create positive learning environments, deliver effective teaching that supports every student’s academic success and well-being in mixed race and socioeconomic status (SES) classrooms, and engage parents in their children’s education (Owings & Kaplan, 2024). The education community has learned that aligning resources to learning improvement goals is not a linear process reflecting resource inputs and achievement outcomes; rather it is a multidimensional process involving specific goals and the allocation of fiscal and nonfiscal resources to achieve those goals (Pan et al., 2003).

## 4. Methods

Through the lens of critical policy analysis this research was designed to answer the following questions:

1) In lieu of federal guidance, are policymakers across state education agencies providing policy guidance to districts that promote remediation of disparities in resources across school districts?

2) In lieu of federal guidance, are school districts providing policy guidance that promote the remediation of disparities in resources across schools?

To better understand the research questions, I reviewed publicly available data published across 25 state education agencies and 10 school district websites. These states were selected randomly. Some of the states reviewed included large and small states. They represented states located throughout the United States, including southern, western, northern, and mid-western states. Additionally, I reviewed publicly available data for school districts. These districts were randomly selected but a focus was made on reviewing resources for large school districts. In my review of documents, I reviewed federal guidance on resource allocation, Dear Colleagues Letters, Frequently Asked Questions (FAQs), and other federal supported resources. Additionally, I reviewed state and school district resources including publicly available documents such as state websites, power points, state guidance, artifacts developed from the federally funded community of practice, state policy letters, stated developed frequently asked questions and other publicly available documents pertaining to the resource allocation reviews.

### Data

For the purpose of this analysis, I reviewed the data pertaining to the Every Student Succeeds Act (ESSA) and the provision centered around resource allocation reviews. In reviewing the data, the following sample data was captured across [Table 1](#) and [Table 2](#).

**Table 1.** Sample language from state and district guidance.

	Resource Allocation Reviews Description
Florida Department of Education	<ul style="list-style-type: none"> <li>The responsibility of the Department is to facilitate district conversations around data on resources and student outcomes, uncover opportunities and barriers to more strategic spending that positively impact students' experiences in school, and create transparency, flexibility and accountability among school and district leaders to distribute adequate funding based on student needs.</li> <li>Field teams are aligned to support LEAs that have CS&amp;I schools. Field teams embedded throughout the state serve as district and inter-agency liaisons to support outcomes for all students through strategic problem solving and capacity building in the areas of accountability and shared leadership, standards-based instruction and learning, and positive culture and environment. There is also a state school improvement director and program specialists that support all the LEAs with CS&amp;I schools. Field team staff are assigned to one of four regions (i.e., northwest, northeast, southwest, southeast) based on the number of schools in each category. The annual allocation of staff and their assigned field teams vary based on the resources needed. Quarterly data is reviewed, and action plans are developed to target specific areas addressed by the data.</li> </ul>

## Continued

Virginia Department of Education	<p>Under ESSA, Virginia must periodically conduct a resource allocation review to support school improvement in each LEA in the State serving a significant number of schools identified, which is defined as 50% or more CSI and/or ATSI schools in the division or 10 or more CSI and/or ATSI schools (ESSA §1111(d)(3)(A)(ii)). This review occurs during the three-year identification cycle.</p> <p>A Resource Allocation Review (RAR) is a collaborative, inquiry-based process to support school divisions and schools with aligning fiscal, human, and instructional resources to improve student outcomes. Reallocation of resources may not always occur, but the review could help LEAs and schools identify potential inequities in resource allocation (ESSA §1111 (d)(3)(ii)).</p> <p>It is not an audit or intended to be punitive in any way. The aim is to make the connection between resources and student outcomes, adjusting as necessary.</p> <p>For more information, refer to the Resource Allocation Review One-Pager.</p>
Prince George County Public Schools	<p><i>The above MSDE information stated that in compliance with their ESSA plans of action:</i></p> <p>“The MSDE will identify resources for the LEAs with TSI schools, including needs assessment, root cause analysis, collaboration support, and other areas to support students in these schools. Based on the needs assessment and root cause analysis, the LEAs will be required to develop action plans for each school that include evidence-based interventions to address identified needs that resulted in identification as a CSI or TSI school”.</p>
Maryland Department of Education	<p>Description of how state will periodically review <b>resource allocation</b> to support school improvement: “A review of <b>resource allocation</b>, including identification of resource inequities, will be a part of the root cause analysis and monitoring process. Local school superintendents will be held accountable for developing and implementing strategies to address resource inequalities in the CSI and TSI schools. The MSDE will prioritize allocation of resources based on need and implementation of evidence-based strategies with strong accountability measures. A robust monitoring and evaluation process for the use of funds has been established by the MSDE. Each LEA provides a monthly spenddown report to the MSDE, as well as a summative fiscal report during all the LEA monitoring visits” (p. 46).</p>
DC Office of the State Superintendent	<p><b>With focus on RAR:</b></p> <p>What LEA and school-level RAR must include per ESSA:</p> <ul style="list-style-type: none"> <li>• Per-pupil expenditures of Federal, State, and local funds required to be reported under section 1111(h)(1)(C)(x); (<b><i>how much govt funding is being spent per student</i></b>)</li> <li>• Differences in rates at which low-income and minority students are taught by ineffective, out-of-field, or inexperienced teachers identified by the State and LEA under sections 1111(g)(1)(B) and 1112(b)(2) of the ESEA; (<b><i>does everyone have unqualified teachers or do some schools have more unqualified teachers than others; included definitions outlining measurements for teacher qualification</i></b>)</li> <li>• Access to advanced coursework, including accelerated coursework as reported under section 1111(h)(1)(C)(viii); (<b><i>how much advanced and accelerated coursework options are available to qualified students</i></b>)</li> <li>• Access in elementary schools to full-day kindergarten programs and to preschool programs as reported under section 1111(h)(1)(C)(viii); (<b><i>are ft kindergarten and preschool programs offered</i></b>)</li> <li>• Access to specialized instructional support personnel, as defined in section 8101(47), including school counselors, school social workers, school psychologists, other qualified professional personnel, and school librarians (<b><i>are these positions being appropriately filled and available to meet the needs of the school</i></b>)</li> </ul> <p>Who will receive RAR? “OSSE will begin by conducting resource allocation review for all LEAs with 10 or more of their schools identified for Comprehensive or Targeted Support, or 60 percent of their schools identified for Comprehensive or Targeted Support (whichever is lower).”</p>

## Continued

A higher percentage of DPSCD revenue is restricted federal funds. Restricted funds limit the District's ability to fund core work—teachers, school leadership, school operations.

Only General Fund revenue can be used to support base school operations, staffing, and salaries

Local & State General Fund is used for:

- ✓ Teacher salary and benefits
- ✓ School based administration (Principal, APs, Clericals) salary and benefits
- ✓ School supplies and discretionary expenses
- ✓ School Operations—custodial, maintenance, transportation, utilities
- ✓ Student recruitment, marketing, advertising
- ✓ Unfunded ESE expenses
- ✓ Core Central Office Functions—Assessments, Communications, Finance, HR, IT, Legal, Payroll
- Facility Improvements (Heating & Cooling, Fencing, Paving, Roofing, etc.)
- ✓ Future negotiated salary and benefit cost increases State & Federal Restricted Categorical funding cannot be used to fund base school operations. The funds can only be used to provide SUPPLEMENTAL ALLOWABLE services.

### **FY 24 School Staff & Resource Allocations Position Allocation (slide 9)**

Detroit Public  
Schools

#### Staff Model

- ✓ Increase in HS Teacher allocations to address master schedule requirements and credit recovery needs.
- ✓ Staff allocations are based on Spring Enrollment, schools are not held harmless for enrollment declines.
- ✓ All schools receive an AP or a Dean of Culture based on enrollment.
- ✓ Schools may budget for supplemental positions with their discretionary general fund or title funds, including an HS AP, Dean, Counselor, CTA, Para, SCF, AI, attendance agent, or Security Guard.

#### Discretionary

- Schools receive \$100/PK—12 students in general fund discretionary.
- All schools are required to fund after school ELA/Math tutoring through District allocation, credit recovery, and have dollars set aside to pay previously negotiated hourly rates for attendance, culture and instructional improvement activities after school or during missed preps.
- Schools must fund individual programs (Math Corps, IB).

#### Central Resources

- Schools will have an assigned attendance agent or will receive support from one of the District attendance agents.
- School nursing services will be allocated based on IEP and general education student needs.
- Supplemental teacher coaching provided by C&I.

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Michigan  
Department of  
Education

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- ✓ School based administration (Principal, APs, Clericals) salary and benefits
- ✓ School supplies and discretionary expenses
- ✓ School Operations—custodial, maintenance, transportation, utilities
- ✓ Student recruitment, marketing, advertising
- ✓ Unfunded ESE expenses
- ✓ Core Central Office Functions—Assessments, Communications, Finance, HR, IT, Legal, Payroll
- Facility Improvements (Heating & Cooling, Fencing, Paving, Roofing, etc.)

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For the 2024-25 school year, the New York State Education Department (NYSED or “the Department”) is providing a pilot program to eligible Target Districts to promote the equitable distribution of resources and support the Department’s understanding of how best to support districts with fulfilling federal requirements regarding resource equity.

New York State  
Education  
Department

The 2024 Title I School Improvement Grant (SIG) 1003 Resource Allocation Review (RAR) funds will be provided to support school improvement in districts that have a significant number of schools identified for receiving additional supports: (Targeted Support and Improvement (TSI), Additional Targeted Support and Improvement (ATSI) and Comprehensive Support and Improvement (CSI). These funds will be separate from the Title I SIG 1003 BASIC funds that districts are currently using to advance their improvement initiatives

***What is a Resource Allocation Review?***

The Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA) requires the New Jersey Department of Education (Department) to periodically review resource allocation in local education agencies (LEA) that serve a significant number of Comprehensive and Targeted schools (ESEA §1111(d)(3)(A)(ii)). State agencies have considerable flexibility and autonomy to design these reviews, determine what data should be included, and decide how to collaborate with schools and LEAs to ensure reviews are helpful instead of burdensome. Resource allocation refers to how LEAs distribute money and other resources to schools. The fiscal resources considered in the review will include all federal, state, and local dollars, as outlined in New Jersey’s School Performance Reports.

New Jersey  
Department of  
Education

The Resource Allocation Review (RAR) is not an evaluation or accountability measure and does not result in punitive action against a school or LEA. The purpose of the RAR is not to surface specific action steps but rather to foster conversation that connects resources to outcomes. The NJDOE will

## Continued

share the results of the RAR with each LEA selected based on the criteria to facilitate a non-evaluative discussion. The opportunity to partner with LEAs in examining the relationship between resource distribution and student outcomes will not only meet the technical requirements of ESEA §1111(d)(3)(A)(ii) but also serve as a leading indicator when completing Resource Equity Reviews in subsequent school improvement plans.

**Frequency**

The NJDOE will conduct the RAR every three years or when schools are identified as being in need of comprehensive support.

**Table 2.** Examples of tools and other resources.

State	Resource
Michigan Department of Education	Michigan Department of Education (2022) Michigan Department of Education Resource Allocation Review Process Guide: A Guide for districts and schools considering resource equity for improving student outcomes, Fall 2022, Lansing, Michigan
New Jersey Department of Education	Board Member, School Leadership and Parent Questions <a href="https://www.nj.gov/education/title1/accountability/">https://www.nj.gov/education/title1/accountability/</a>
Virginia Department of Education	VDOE Resource Allocation Review At-A Glance (One Pager) <a href="https://www.doe.virginia.gov/home/showpublisheddocument/52463/638731492054170000">https://www.doe.virginia.gov/home/showpublisheddocument/52463/638731492054170000</a>

## 5. Findings

In reviewing publicly available resources the data suggests that there are examples of states and districts that are providing additional resources to assist local decision making that may improve the allocation of resources to support marginalized students. In reference to research question 1 *In lieu of federal guidance, are policymakers across state education agencies providing policy guidance to districts that promote remediation of disparities in resources across school districts?* The data suggest that there are a number of examples for which policymakers across SEAs are providing policy guidance around the disparities in resources. For example, in New Jersey the state education agency produced guidance for internal and external stakeholders. The following sample questions were extracted from publicly available documents listed on the state website:

- Which schools spends the most per student? The least?
- Is there a school that spends more than the average and is lower performing?
- How do middle/high schools compare spending and math outcomes to others in the state?

Those prompt examples may allow for conversations to take place at the local level that question past practices but also may assist in developing strategies that leads to better outcomes for marginalized students.

In another example, the New York State Education Department developed a pilot program to eligible targeted Districts. The program was designed to promote the equitable distribution of resources and support the Department's understanding of how best to support districts with fulfilling federal requirements regarding

resource equity.

The following language was extracted from publicly available documents made available by the New York State Education Department.

“The Department has established guidance and parameters for districts regarding the use of these funds:

- **CATEGORY 1:** The funds must directly connect to support team participation in RAR required activities that begin in April 2024 and are expected through December 2024.
- **CATEGORY 2:** Support a district-identified facilitator that will lead the team discussions and ensure the protocols are followed.

Each eligible Target District must complete an FS-10 as a single LEA application. Districts should ensure that the submitted FS-10 aligns with the pilot program activities and participation needs. These include the following:

As part of the application review, NYSED will be looking for alignment between pilot expectations and the FS-10 budget costs.”

The language may be viewed as promoting the changes at the local level that mitigate the inequities for which the legislation is designed to address.

There are also examples of how some states are implementing the ESSA resource allocation review. In Michigan, the state’s process for implementation includes a four phased approach designed for multibuilding districts serving schools identified as underperforming. In Phase I, the state requires the districts to view a forty-minute summary video to gain an understanding of the Resource Allocation Review process. In phase 2, district leaders and building-level representatives review high-level district-wide financial data such as the school-level expenditure reports that reflect expenditure and academic performance differences between buildings. The state recommends suggested personnel to participate in those discussions (e.g. Superintendent, district instructional leaders, leader of state and federal programs, etc.). In step 3, the state asks districts to complete the resource allocation inquiry as part of the needs assessment process and estimates that the inquiry will take eight to twelve hours. Finally, step 4, requires a resource equity determination. In this step the school-level team determines if something needs to be addressed to ensure that equitable resources are provided such that each student receives the necessary resources to meet or exceed state academic standards. The school-level teams confer with the district-level team to reach agreement on the determination of inequity or equity.

Furthermore, the data suggests that there are a number of states that have not provided much guidance outside of the federal guidance. For example, the below text was extracted from the Virginia Department of Education website:

*“Under ESSA, Virginia must periodically conduct a resource allocation review to support school improvement in each LEA in the State serving a significant number of schools identified, which is defined as 50% or more CSI and/or ATSI schools in the division or 10 or more CSI and/or ATSI schools (ESSA §1111(d)(3)(A)(ii)). This review occurs during the three-year identification cycle.*

*A Resource Allocation Review (RAR) is a collaborative, inquiry-based process to support school divisions and schools with aligning fiscal, human, and instructional resources to improve student outcomes. Reallocation of resources may not always occur, but the review could help LEAs and schools identify potential inequities in resource allocation (ESSA §1111 (d)(3)(ii)).*

*It is not an audit or intended to be punitive in any way. The aim is to make the connection between resources and student outcomes, adjusting as necessary.*

*For more information, refer to the Resource Allocation Review One-Pager.”*

Though the state references a one-pager, the text mirrors the language from guidance from the federal U.S. Department of Education and provides little detail around process nor benefit for local schools and districts.

As it pertains to research question #2, *in lieu of federal guidance, are school districts providing policy guidance that promote the remediation of disparities in resources across schools?* I found little evidence that school districts were promoting this policy, at least publicly visible, at the district level. There was an example, in Detroit Public Schools. Detroit Public Schools developed resources aimed at assisting its schools understand how the distribution of resources is allocated. For example, the district identified the distribution of staff, discretionary funding and central office resources. In doing so, District Public Schools made public the process for distributing resources. The following language was extracted from public resources:

*Staff Model*

- ✓ *Increase in HS Teacher allocations to address master schedule requirements and credit recovery needs.*
- ✓ *Staff allocations are based on Spring Enrollment, schools are not held harmless for enrollment declines.*
- ✓ *All schools receive an AP or a Dean of Culture based on enrollment.*
- ✓ *Schools may budget for supplemental positions with their discretionary general fund or title funds, including an HS AP, Dean, Counselor, CTA, Para, SCF, AI, attendance agent, or Security Guard.*

*Discretionary*

- *Schools receive \$100/PK-12 students in general fund discretionary.*
- *All schools are required to fund after school ELA/Math tutoring though District allocation, credit recovery, and have dollars set aside to pay previously negotiated hourly rates for attendance, culture and instructional improvement activities after school or during missed preps.*
- *Schools must fund individual programs (Math Corps, IB).*

*Central Resources*

- *Schools will have an assigned attendance agent or will receive support from one of the District attendance agents.*
- *School nursing services will be allocated based on IEP and general education student needs.*
- *Supplemental teacher coaching provided by C&I*

In this case, this language mirrored the language shared at the state level from

the Michigan Department of Education.

I also saw examples of equity in resource allocation outside of the ESSA context. In Chicago, the district was making efforts to close inequities through intentional resource allocation processes. For example, the district developed a 5-Year vision and included resource equity as one of its main tenors. While challenging, the district stated goal was to create equitable student experiences in a learning-ready environment while recognizing that providing the same amount of resources to students and schools with different lived experiences, assets, and challenges will maintain the status quo. The district instead focused on an approach to use liberatory thinking and inclusive partnerships as an opportunity to build pathways to resource equity. In doing so, the district created an equity framework designed to establish strategies and goals that aligned to the continuous improvement work plan of schools. The district developed phased plans that required schools to have discussions with individuals across each school community. The phases of the process included 1) Phase 1, identify the opportunity, define what the disparity in opportunity or achievement that you need to address (e.g. what considerations need to be taken into account, what students groups are affected, what quantitative or qualitative data will be reviewed); 2) Phase 2, conduct a root cause analysis (e.g. identify what the 2 - 3 root causes identified for the disparities and what are the resources required to address the disparity), 3) Phase 3, identify the available resources (including creating a process that identify which ideas may have the greatest impact and why? Phase 4, identify additional request if necessary (including identifying how you might connect those resources and who might you reach out to); and, finally, Phase 5, create a vision planning section focused on aspirations and progress (e.g. as a result of securing the resources, what might be the visible changes).

The work in Chicago Public Schools occurred outside of ESSA. However, the work provides an example of how process designed to carry out the mission of ESSEA around equitable resource allocation might occur.

## 6. Discussion

It's unclear whether the findings from this study are related to the growing body of research around the state implementation for the reallocation legislation. More recent research has provided a glimpse into state compliance with ESSA since 2015 in relation to resource allocation. One study investigated the equity of resource allocation in relation to teachers, including their salaries, experience levels, and student-teacher ratios, at both the national and district levels (Knight, 2019). Findings from this study revealed that while more funding was allocated to higher-poverty schools to increase teacher salaries and improve teacher-student ratios by decreasing class sizes, schools with higher minority and poverty levels were also found more likely to employ less experienced novice teachers than low-poverty schools. Such findings may potentially support explanations for persisting data reflecting academic achievement gaps within high-poverty schools. This em-

irical evidence aligns with other research which suggests that allocating resources to increase quantifiable variables such as teacher salaries and the number of teachers employed, may not positively eclipse the quantifiable variables of the cultural competence, expertise, and experience of teachers required for underserved populations (Della Sala et al., 2017).

Robinson & Bell (2024) echoed how allocating resources provided under the ESSA to the use of school report cards and standardized testing as accountability measures may further hinder inequity in schools. Researchers found that although many states interpreted equity under the ESSA to reflect the need to allocate resources to increase the recruitment of racially diverse and culturally responsive educators (Ayscue et al., 2023; Chu, 2019), the ESSA fell short of explicitly defining culturally relevant needs such as the necessity of developing the cultural competency of teachers (Robinson & Bell, 2024). Given that racial diversity does not automatically equate to cultural competency, untrained educators accompanied by unaddressed gaps in cultural competence led to the collection of disciplinary data lacking cultural understanding of the inequities of racially influenced discipline. This resulted in decreased scores on school report cards with higher discipline rates, decreased school climate, and decreased student success (Knight, 2019; Robinson & Bell, 2024). Researchers suggest that an insufficient amount of resources is being allocated to adequately train recruited educators to improve student outcomes through increased cultural competence. Additionally, the minimal effort to hold schools accountable when they fail to prioritize culturally relevant equity, further marginalizes students attending such schools and reinforces inequities in resource allocation. (Ayscue et al., 2023; Chu, 2019; Knight, 2019; Robinson & Bell, 2024).

Another study used a critical policy analysis (CPA) framework and qualitative methods to assess how the state of North Carolina implemented equity in allocating resources under the ESSA. (Uzzell et al., 2024). This study found that key stakeholders responsible for designing and enforcing the implementation of ESSA on a state level, did not believe that equity was the primary motivation behind the ESSA, and therefore “relied on what [the state] was already doing to promote equity” (p. 642). Researchers discovered stakeholders acknowledging an apparent imbalance in allocating funds to state districts, attributing the imbalance to North Carolina’s funding based “on the county tax base” (p. 642), and maintaining a position of choosing to define equity under the ESSA as meaning accountability. Interviews with stakeholders also suggested that compliance-driven actions were taken, or in other words, changes that North Carolina made under ESSA focused more on documenting the meeting of federal standards, and less on allocating resources to develop new creative ways to meet the unique needs of their diverse student population (Uzzell et al., 2024).

A review of the literature discussing research on state compliance with resource allocation under ESSA guidelines over the past eight years strongly suggests that, across several studies, the meaning of “equity” under ESSA (e.g., equity in terms

of accountability or access) remains a topic of ongoing debate and is open to interpretation (Ayscue et al., 2023; Chu, 2019; Knight, 2019; Robinson & Bell, 2024; Uzzell et al., 2024). Apparent gaps in understanding raises additional questions regarding the effectiveness of the implementation of the ESSA over the past decade, suggesting that further adjustments to the policy may need to be considered, ensuring a focus not based on compliance alone, but on clearly understood and authentic equity in resource allocation for the success of all students.

In this study, I selected the focus of school and resource allocation, because school finance has been a powerful influence on student learning. However, this study provides a glimpse of the difference between policy rhetoric and practiced reality. While school finance research has become well known across education circles, in practice, many school-based efforts to allocate resource default to an outmoded set of distributing the funding equally.

Policy Development. At the state level, many of the states I examined followed guidance from the U.S. Department of Education that centered around resource allocation. In doing so, several of the state education agencies I reviewed incorporated language across their websites and other resources. In most cases, it's clear from those examples as to how the state defined resource allocation as it aligned the federal guidance. However, even with the inclusion of this language across multiple platforms, I saw little evidence of policy guidance that promoted true examples of equitable resource allocation strategies. TAs such suggested by the language in the law itself, there is a real need for equitable resource allocation. In Richard Rothstein's 2004 book, *Class and Schools*, he suggests that we tend to provide weaker education in highly impoverished schools and that the major claims about successful reforms in these schools are wrong. Moreover, Rothstein (2004) argues that it is unrealistic to expect to change schools in any deep way without dealing with some of the issues that arise with poverty (Rothstein, 2004). The hardships faced by poor children are often compounded because they are more likely than their advantaged counterparts to live in economically disadvantaged, chaotic, and under resourced communities (Bischoff & Reardon, 2014). This research seems to suggest that students of poverty tend to benefit the least from education systems and the inequities in the allocation of resources in education align to broader issues as the availability of resources that are particularly salient to disadvantaged populations, such as food banks and welfare offices, also appear lower in rural and suburban communities than in urban ones (Allard, 2008; Murphy & Wallace, 2010).

## 7. Conclusion

Over the past decade or so there has been many efforts underway to provide more equitable distribution of resources. These efforts have led to state and local policies designed to improve the distribution of resources. For example, district-led weighted-student funding policies offer the potential to increase equity in the distribution of funds to schools, by directing more resources to schools serving more

disadvantaged students. Across many school districts and states, policies have been created to allow the dollars to follow students with the recognition that some students have more need than others and that meeting those students' needs is more resource intensive, known as weighted-student formula. Although relatively uncommon for many years, weighted-student funding is now used in some form in more than 30 large U.S. school districts (Roza et al., 2021). This model is popular as it provides school principals more autonomy over how to allocate spending across categories (e.g., teacher and staff, instructional materials, technology) to best meet student needs. It also makes the link between student characteristics (e.g., family income, special education status, English Learner (EL) status, homelessness, achievement levels (Levin et al., 2019)) and dollars allocated to schools more transparent. Despite the support for these types of models, resource allocation decisions and processes continue to be a topic of debate. The federal ESSA resource allocation reviews were designed to assist in decision making. However, his findings from this study highlight the complexities of each state and district approach to implementing federal policy. In particular, the approach to federal policy that in itself is meant to support schools and districts that serve marginalized students. In this article, I argue that the federal policy around resource allocation cannot be divorced from societal issues including social power dynamics that exist between school systems and communities of poverty. Specifically, I call attention to the interpretation and implementation of a resource allocation federal policy meant to mitigate long standing inequities in resource allocation practices. As noted, historically schools have not done an effective job of allocating resources to underserved students or communities of poverty, despite the research that supports the need to do so. With the knowledge of the impact of insufficient funding has on schools; as well as the policy around resource allocation, there was a greater opportunity to reimagine what resource allocation may look like for schools and districts, serving underserved and high poverty communities. As a result, I argue that the language in the resource allocation policy is designed to promote a different approach to decision making at the local level around resources. Furthermore, I argue that while there are examples of the communication of this policy, little has been done (publicly) by state and local education agencies to implement and/or communicate this policy which may lead to communities of poverty continuing to be left out due to inequitable embedded structures. As a researcher, my argument is that the future of allocating resources for education should seek to dismantle a system of inequity. Particularly when the historical context is considered.

In closing, while federal policy has been inclusive to add language around resource allocation in marginalized communities, more must be done. Education has long been viewed as the "great equalizer" that can lift individuals from the circumstances of their birth. As such educational equity must be seen as a fundamental legal right that requires fairness in educational opportunities. Particularly, as it relates to structures whose inequitable, inadequate distribution across lines

of poverty and race have been well documented (Oakes, 2002). There is significant evidence here for further consideration of inequalities that exist across communities and the federal, state, and local educational context for making policy around resource allocation decisions that will have compelling impact on students from marginalized communities. Historically, the U.S. government did not play a role in the provision of education. After the Civil War when states provided additional opportunities for both whites and blacks in the South, the first national involvement in schooling took place. In the 20<sup>th</sup> century, government has been involved in educational outcomes with the passage of the Education Professions Development Act, the Civil Rights Act, and the Elementary and Secondary Education Act. In doing so, it did not only authorize and provide funding for schools, but the government also placed a heavy equity focus on the neediest American students. Current efforts to meet this call continue to face numerous obstacles, including the entrenched disparities in school finance. The struggle to address inter-district and inter-school funding disparities is compounded by the reality that poor and minority students are disproportionately impacted by jurisdiction-level disparities and are already operating at an education disadvantage. The call in ESSA to address resource inequities, particular in schools and districts that serve marginalized students, must focus on 1) making allocation decisions across schools and within schools based on data that present the needs of each community, school, and/or student group; 2) creating processes that structurally re-organizes the school or district to allocate time and resources internally to focus on the needs of the school, teachers, leaders across the most concentrated areas of disadvantage, which requires truly knowing the schools, communities and needs and, 3) making allocation decisions that assess the current and future impact of the resource distribution and in doing so, use a broader range of data that includes qualitative by engaging with stakeholders. In doing so, states, districts and schools can see themselves as institutions with tremendous agency that committed to prioritizing the neediest students.

### Conflicts of Interest

The author declares no conflicts of interest regarding the publication of this paper.

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