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Shortchanging Complexity: Discourse, *Distortions,* and Diversity Policy in the Age of Neoliberalism

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Abstract: With this paper we explore the practical materialization of select diversity policies in the United States via an analysis of their implementation at different institutional levels. Specifically, using a cultural studies framework that is guided by Stuart Hall's (1993) concept of distortions, we investigate how discursive conceptualizations of diversity have been translated into educational policy at the federal and state levels. We contend that the complexity of diversity is often inconsistent with existing neoliberal reform trends that embrace standardization and accountability, making meaningful practical applications exponentially more challenging (Manna, 2011; Wong, 2008). Finally, we look to how these analyses might inform future iterations of diversity policy in a time where rapid changes in education policy and characteristically partisan political agendas have become the norm.
Keywords: Cultural studies; Stuart Hall; diversity policy; neoliberalism; distortions

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Para engañar a la complejidad: Discurso, distorsiones y política de diversidad en la era del neoliberalismo
Resumen: Con este documento exploramos la materialización práctica de políticas de diversidad seleccionadas en los Estados Unidos a través de un análisis de su implementación en diferentes niveles institucionales. Específicamente, utilizando un marco de estudios culturales guiado por el concepto de distorsiones de Stuart Hall (1993), investigamos cómo las conceptualizaciones discursivas de la diversidad se han traducido en políticas educativas a nivel federal y estatal. Sostenemos que la complejidad de la diversidad a menudo es inconsistente con las tendencias de reforma neoliberal existentes que abarcan la estandarización y la rendición de cuentas, lo que hace que las aplicaciones prácticas significativas sean exponencialmente más desafiantes (Manna, 2011; Wong, 2008). Finalmente, observamos cómo estos análisis podrían informar futuras iteraciones de la política de diversidad en un momento en que los rápidos cambios en la política educativa y las agendas políticas característicamente partidistas se han convertido en la norma.
Palabras-clave: estudios culturales; Stuart Hall; política de diversidad; neoliberalismo; distorsiones

Para enganar a complexidade: Discurso, distorções e política de diversidade na era do neoliberalismo
Resumo: Com este artigo, exploramos a materialização prática de políticas diversas selecionadas nos Estados Unidos por meio de uma análise de sua implementação em diferentes níveis institucionais. Especificamente, usando um arcabouço de estudos culturais que é guiado pelo conceito de distorções de Stuart Hall (1993), investigamos como as conceituações discursivas de diversas têm que ser traduzidas em políticas educacionais nos níveis federal e estadual. Afirmamos que a complexidade da diversidade é muitas vezes inconsistente com as tendências de reforma neoliberais existentes que abraçam a padronização e a prestação de contas, tornando aplicações práticas significativas exponencialmente mais desafiadoras (Manna, 2011; Wong, 2008). Finalmente, analisamos como essas análises podem informar futuras iterações de diversas políticas em um tempo em que mudanças rápidas na política de educação e agendas políticas caracteristicamente partidárias se tornaram a norma.
Palavras-chave: Estudos culturais; Stuart Hall; política de diversidade; neoliberalismo; distorções

Introduction

Diversity—conceptualized by scholars as distinct and dissimilar perspectives—is inherently a complex concept (Anderson, 2013; Paulus & Nijstad, 2003). As illustrative of this reality, the benefits associated with diversity (e.g., creativity, deep understanding) are multifarious in nature and often linked to abstract practices (e.g., constructive dissent, ill-structured objectives) that are difficult to measure (Bayne & Scantlebury, 2013; Nelson & Stolterman, 2012; Shapiro, 2013). However, scholarship underscores that when multi-dimensional concepts are translated into objects of education reform, their complexity becomes structured around the discourse of efficiency and effectiveness, which standardizes the concepts into simplified, observable measures (Bowen, Kurzweil, & Tobin, 2005; Magnuson & Waldfogel, 2008; Manna, 2011). As a result, the pith of the

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reform target loses its place at the center of policy initiatives, the ultimate outcome of which is the oversimplification of what should be an exceedingly complex process that has far-reaching implications for both economic advancement and social justice (Giroux, 1997; Noddings, 2004). We argue that a similar fate has befallen diversity policy in education.

In particular, we contend that the complexity of diversity is often inconsistent with existing neoliberal reform trends that embrace standardization and accountability, making meaningful practical applications exponentially more challenging (Manna, 2011; Wong, 2008). Since the 1980s, neoliberal tenets—which favor market-based competition, privatization, standards, and consequential accountability systems over policies that promote a strong public system of education—have dominated the education policy landscape (Ellison, 2012; Hursh, 2007). The ultimate outcome of these policies has been the reconfiguration of education according to the same business models of inputs and outputs that are typically associated with the private sector. It is no surprise, then, that diversity, which is often associated with a myriad of ideas that are quite intricate, has been characteristically difficult to translate into digestible policy reform within this one-dimensional neoliberal paradigm. Where it does exist, diversity policy is largely structured around rubrics and checked boxes, and so represents a sort of reactionary politics as opposed to meaningful and intentional reform.

With this paper we explore the practical materialization of select diversity policies via analyses of their implementation at different institutional levels. Specifically, using a cultural studies framework that is guided by Stuart Hall's (1993) concept of distortions, we investigate how discursive conceptualizations of diversity have been translated into educational policy at the federal and state levels. We begin with a brief review of literature that traces the theoretical underpinnings of this research, particularly how various policies become distorted and diluted as they evolve from discourse to policy formation and finally to policy implementation; and how this process is ultimately the result of distinct power dynamics that are disguised as being neutral. Next, we outline the methodology and the process by which we collected the data that comprise the primary focus for this analysis. Finally, we analyze the collected documents against the sociological tools utilized for this study, after which we look to how these analyses might inform future iterations of diversity policy in a time where rapid changes in education policy and characteristically partisan political agendas have become the norm. We contend that, until this misalignment is addressed with concrete policy interventions, little will change and the U.S.'s virtual "orgy or reform" will continue (Schrag, 2010, p. 355).

Theoretical Underpinnings

Cultural Studies

This work draws heavily from cultural studies, which is a field of study[1] that has enjoyed a rich history of scholarship and debate. This academic enterprise is characteristically difficult to define, largely as the result of its multiple origins, theoretical positions, and methodologies. In its most general iteration, "cultural studies is about the ways in which culture deploys power through dynamic and often asymmetrical relations of control, the actors who animate these relations, and the

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[1] We use the phrase "field of study" here to highlight the contested nature of cultural studies as an academic "discipline." According to Wright (1996), "cultural studies is not really a single discipline but, rather, it is multidisciplinary, interdisciplinary, postdisciplinary and even anti-disciplinary . . . It appropriates unabashedly from the established disciplines and juxtaposes any number of such appropriations in order to produce work that is not only innovative, contemporary and *avant garde* but which would often not be quite acceptable to the traditional disciplines" (p. 13).

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overall outcomes of the research endeavor, which becomes a political project" (Arce-Trigatti & Anderson, 2018, p. 4). In many ways, then, cultural studies:

> is both a critical project and a political project. Critically, cultural studies aims to interrogate the power dynamics which structure how particular cultural symbols, artifacts, forms, and practices get valued and deemed important and worthy, and conversely, who and what gets marginalized in the process. Politically, cultural studies begins with a commitment to disempowered populations and to the idea that academic work should make a difference. (Hytten, 1997, p. 41)

In light of these commitments, we aim to interrogate not only the ways in which diversity policy is constructed and implemented, but also the power dynamics that facilitate the process as a whole.

Specifically, we are interested in the ways in which, "discourse theories are useful for investigating how policies are read and used in context; in other words, for documenting the politics of discourse during policy implementation" (Taylor, 1997, p. 29). These understandings not only help to define the ways in which educational discourses have structured our popular conceptions of diversity, but also how they have informed the processes of diversity policy development and implementation. We see this research, then, as potentially informing the construction of more meaningful and intentional diversity policy (as opposed to watered down and reactionary policy) in the pursuit of more equitable outcomes for minoritized[2] youth. With the remainder of this section, we outline the primary sociological tools that guide our analysis: Hall's (1993) concept of distortion, which is linked to his four-stage theory of communicative exchanges and the sociological implications of encoding and decoding messages that are transferred between and among hierarchically positioned social beings. As this is a cultural studies project, we use these sociological tools to document the asymmetrical power dynamics that manifest throughout the processes of diversity policy development and its subsequent interpretation and implementation.

Stuart Hall, Distortions, and Policy Making

Stuart Hall, a prominent cultural studies theorist, contributed to what has become known as reception theory via his concept of encoding/decoding, which is based in semiotics and the work of Roland Barthes on denotation and connotation[3] (Allen, 2003; Barthes, 1984; Hall 1993). Encoding/decoding refers generally to the ways in which a message is produced by an author (encoded) and consumed by an audience (decoded) (Hall, 1993). For Hall (1993), the dissemination of messages, primarily through the media of mass communications and television (though applicable to education policy as well), is not a neutral process of inputs and outputs. Rather, the processes of message construction, circulation, consumption, and, ultimately, distortion are never static or transparent, nor is the message's receipt by an individual actor a passive process (Hall, 1993).

The concept of distortion is central to this process. For example, Hall (1993)—via an analysis of television messages—outlined a four-stage theory of communicative exchanges. In this framework he suggests that communicative messages are not open to interpretation, but rather are guided through "relatively autonomous stages" of production, circulation, use (i.e., distribution or consumption), and reproduction (Hall, 1993, p. 508). In the following he clarifies this point stating:

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[2] We use the term *minoritized* here (and elsewhere) in an attempt to marry the language of the policy briefs themselves, which typically use "minority" to describe populations whose backgrounds and identities might depart from dominant, whitestream norms, with our belief that "minority" status is actively used by dominant groups to marginalize and subjugate peoples, regardless of actual numbers.

[3] Whereas denotation refers to the literal meanings of signs/signifiers, connotation refers to the socio-cultural associations that actors apply to signs/signifiers.

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> Thus while in no way wanting to limit research to 'following only those leads which emerge from content analysis', we must recognise that the discursive form of the message has a privileged position in the communicative exchange (from the viewpoint of circulation), and that the moments of 'encoding' and 'decoding', though only 'relatively anonymous' in relation to the communicative process as a whole, are determinate moments. (Hall, 1993, p. 508)

For an event to become initially communicable, it must first be transformed into a communicable message through the communicator's rules of discourse and symbols, which provides the basis for exchanges within the phase of circulation (Hall, 1993). This initial transformation of an event into a story (i.e., production) embedded within particular discursive rules is, by itself, a determinate moment. However, subsequent stages wherein this story is newly integrated into other, distinct social contexts and communication processes (i.e., use and reproduction), are also determinate moments. According to Hall (1993), within each exchange, the discourse must be translated and transformed into the social practices of the respective recipients' context if it is to be effective. He adds,

> Since each [phase] has its specific modality and conditions of existence, each can constitute its own break or interruption of the 'passage of forms' on whose continuity the flow of effective production (that is, 'reproduction') depends. (Hall, 1993, p. 508)

It is therefore conceivable that if no meaning is constructed within the message production and circulation phase, there is no guarantee of consumption or reproduction of the message (Barker, 2012; Hall, 1993).

A central component of this process, Hall (1993) stresses, is the actuality that "the 'object' of these practices is meaning and message in the form of sign-vehicles of a specific kind organized, like any form of communication or language, through the operation of codes within the syntagmatic chain of a discourse" (p. 508). Messages are encoded and decoded based on the degrees of symmetry (i.e., understanding and misunderstanding) developed between the participants in the communicative exchange. As these processes represent determinate moments in the messages' transformation, the degree of symmetry within the codes (i.e., symbols) embedded within the discursive practices that are utilized to interpret and transform the message are significant (Hall, 1993). The lack of fit between these codes is, moreover, influenced by structural differences of relation and position (e.g. power differentials) between the author(s) and audience at the moment of transformation into and out of these codes (Hall, 1993). The more "lack of equivalence," then, between these factors, the higher the level of "distortions" or "misunderstandings" between subjects (Hall, 1993, p. 510).

Within this process of encoding and decoding, three hypothetical positions, from which the decoding of messages can be derived, are characterized as follows: dominant-hegemonic position, negotiated code, and global translation. In the case of the dominant-hegemonic position, the author's connoted meaning is decoded by the audience as intended and is encoded utilizing the dominant, hegemonic code in which it was received (Hall, 1993). In a negotiated code, the audience acknowledges the legitimacy of the hegemonic definitions embedded in the author's original code; however, these definitions are redefined according to the audience's own socio-cultural position (Hall, 1993). Finally, in a global translation, the audience understands both the literal and connotative codes embedded within the author's original code; however, the message is encoded according to an alternative frame of reference that is preferred by the audience (Hall, 1993). For Hall (1993), the distinctions between these encoding and decoding approaches are purely analytical in

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that it helps to comprehend the literal meaning (denotations) associated with broadly publicized messages and how they are ultimately interpreted (connotations) by audiences via associations with frames of reference and preferences (Hall, 1993).

This process is applicable to education policy as well. The construction of public policy follows a relatively standardized path that is constituted by six, distinct, but inter-related, phases: 1) problem-definition, wherein policy-makers identify and define a specific policy problem; 2) agenda-setting, which refers to that stage where an issue or problem is placed on the political agenda of government decision-makers; 3) policy formulation, wherein the issue is further defined, and competing proposals regarding appropriate policy responses are debated by public officials and the general public; 4) policy legitimation, which refers to the selection of policies deemed by decision-makers to be the best possible solution to the problem; 5) policy implementation, wherein the policy is formally implemented at various levels of governance by actors with the legal authority to do so; and 6) policy evaluation, which refers to the assessment of implemented policies by government mandates and/or private interests to determine whether or not the policy is achieving its stated goals or objectives (Lindblom & Woodhouse, 1993).

Throughout each of these steps, there is a real concern that the policy author's (e.g., the federal government) intentions are misinterpreted by its targeted audience (e.g., local and state governments) (Birkland, 2007; Hall, 1993; Stone, 1989). In applying Hall's (1993) categorization of distortions to diversity policy development and interpretation, we can posit that each phase of the policy-making process undergoes various iterations of the encoding/decoding process. As each phase outlined in the four-stage communicative theory is relatively autonomous, then we can extrapolate that exchanges lead to higher levels of distortion as they enter different phases of the policy processes, especially if the lack of equivalence between the dominant and receiving codes is high (Hall, 1993). It can also be the case that if no meaning is readily interpretable at the problem definition phase of the policy making process, it may have little to no reception or circulation at the latter stages of the policy development process (Hall, 1993). For example, if the policy is not defined in an interpretable communicative exchange at the problem definition level, it may have no reception at the agenda-setting level.

In this scenario, then, the problem definition and agenda setting phases drive the entire policy process. Because these phases focus the attention of the public and government officials on a narrowed set of processes and practices, typically at the expense of other processes and practices that have been ruled out, they establish the scope and kind of possible policy solutions (Stone, 1989). This has very real implications for the public at large in that, "the group that successfully describes a problem will also be the one that defines the solutions to it, thereby prevailing in policy debate" (Birkland, 2007, p. 63). We must therefore not only understand the original message and the symbols utilized to encode the event, but also we must examine how the message was received and interpreted in the context of the socio-cultural symbols of the audience (Hall, 1993). As each stage of the encoding/decoding process is a determinate moment where specific socio-cultural discursive codes influence the use and reproduction of these policies, we can examine distortions of the original, translated message at these distinct stages. Specifically, we can utilize Hall's (1993) hypothetical positions—dominant-hegemonic position, negotiated code, and global translation—to provide insight into the nature of these distortions with respect to the interpretation and transformation of diversity policy. Better understanding distortions as they apply to diversity policy in education through these positions has the potential to uncover misalignments from communication between the author (i.e., federal government) and audience (i.e., local and state governments) of these policies, which, we contend, allows for transformational critique and intervention.

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Methodology

Aligned with the above framework, the following research question drives this study: how are the discursive practices as produced by the American federal government around education-based diversity policies and initiatives being interpreted (i.e., encoded/decoded) and translated into practice by audiences at other levels of government (e.g., state and local)? To answer this question, we utilize Hall's (1993) theory of *distortions* to analyze archival data to explore the implementation and subsequent understanding of diversity-based education policy at varying institutional levels. This analysis is encased in a cultural studies framework which anchors the analysis on issues of power dynamics as manifested in discourse (Barker, 2012; Hall, 1993). We bound our exploration within the confines of two distinct data sources—federal and state policy—which, in turn, provide us with the archival data and discursive material focus for our analysis. Further, we limit the exploration to one Presidential administration's tenure (i.e., the Obama administration) to provide conceptual continuity with regards to policy produced at the federal level (Ary, Jacobs, Soresen, & Razavieh, 2010; Harland, 2014).[4] We argue that this type of exploration is necessary at a cross-sectional level (i.e., one specific example bounded by artificially defined confines) because of the varied association of this topic with different political administrations and the rapidity with which diversity policies shift due to these associations.

Archival Data Selection

This study explored two types of documents: 1) specific calls for diversity policy at the federal level by former Secretary of Education Arne Duncan; and 2) policy proposals for diversity initiatives (including Race to the Top, *RttT*) at the state level. The review of these documents ranged from 2008-2016, reflecting the span of the Obama administrations during which diversity was a policy initiative. As indicated, this selection was purposefully bounded by historical constraints (2008-2016) and societal constraints (one Presidential tenure) to provide contextual and conceptual continuity within the documents selected (Ary et al., 2010; Harland, 2014). Two consecutive searches within the Department of Education database were conducted. First, a wide electronic search utilizing descriptors relating to the words *diversity education initiatives* and *diverse education policy* was conducted using the Department of Education database. The purpose of this initial search was to gather indicators of policy initiatives that centered on diversity, education, and changing or reforming policy.

After reviewing the results of the first search, we conducted a second search that was more narrowly focused on the words *diversity proposals* and *diversity policies*, *increasing diversity*, and *diversity grants* associated with either federal or state responses. The purpose of this was to refine the documents to audience relevance (federal or state responses) that related directly to the focus of this study; we were purposefully intending to gather archival documents that reflected interaction between varying government levels (e.g., federal calls or initiatives, state level proposals for these calls). From our results we selected the documents that utilized diversity as a primary indicator of the goals and objectives of the policy, proposal, or grant described. These documents also had to contain a definition of diversity and the word could not be utilized solely as an adjective or verb to describe another goal or objective (e.g., diverse schools or the diversification of schools). This refined search resulted in 7 policy initiatives that relate to Duncan's articulation of diversity in various educational contexts and 6 policy responses (e.g., *RttT* proposals) representing various states'

[4] Diversity is not a policy priority of the Trump administration, implying that misinterpretations about its inclusion in education policy are likely to increase exponentially (Ng & Stamper, 2018).

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(including Arizona, Florida, Massachusetts, Colorado, Texas, and California) calls for diversity. These documents comprise the data that we analyzed utilizing the sociological tools outlined above.

Process of Analysis

In a recent study, we presented findings from an analysis of select popular and political texts, wherein diversity was defined, shaped, and transformed by other words, proxies, or dialogue techniques that converted the term into one of two primary themes: 1) *diversity as an economic input,* wherein the overall goal of diversity becomes conflated with various economic realities and incentives; and 2) *diversity as a democratic input*, which positions diversity as a potential means by which to facilitate intercultural dialogue and collaboration, as well as to further the cause of social justice (Arce-Trigatti & Anderson, 2018). With this study, we take these findings one step further by expanding our data sources to include specific policy proposals, initiatives, directives, etc., that were generated, in part, as a response to, and in concert with, these popular texts relating to diversity. As such, the current study aims to document the "politics of discourse during policy implementation" utilizing the theory of encoding/decoding as a framework for understanding this process (Hall, 1993; Taylor, 1997, p. 29).

We began our analyses by comparing the themes that we produced in the first project against Duncan's call for diversity policies both as an additional level of analysis and as a means by which to test the validity and rigor of our original findings. In the second phase of analysis, we evaluated the extent to which the discursive constructions that we originally identified were consistent with their practical materiality (i.e., policy constructions) via analyses of accompanying diversity policy proposals. We then traced the ways in which these policy constructions have been implemented in specific diversity initiatives. Collectively, these three levels of analysis produced the following themes: 1) *defining diversity,* which examines the way in which state policymakers are interpreting diversity and who gains access to the policy benefits, 2) *positioning diversity*, which illuminates where diversity is typically, or strategically, placed in policies, i.e., to promote economic gain vs. to value racial/ethnic diversity; and 3) *diversity as an economic investment,* wherein diversity is conflated with the notions of increasing human capital as a means to increase economic advantage.

In the final and most analytically significant phase, we applied Hall's (1993) concept of *distortions* to the themes that we identified from the qualitative data identified above. Specifically, we undertook a process of deductive analysis following Gilbert (2008), who describes the sort of deductive theoretical approach that we took as,

> starting with a theory and using it to explain particular observations . . . Deduction takes the data about a particular case and applies the general theory in order to deduce an explanation for the data. (p. 27)

Our reasoning for using Hall's (1993) concept of distortions in this way was thus to help better understand the how and why of policy development with regards to diversity policy in education (Gay & Weaver, 2011; Gilbert, 2008). This final process of analysis, therefore, allowed us to theorize the construction of education policy within complex historical, economic, social, political, and cultural contexts, by providing the theoretical substance with which to document "the politics of discourse during policy implementation" (Taylor, 1997, p. 29). Aligned with this deductive theoretical process, the examples selected for this analysis follow best practices specified within theoretical work and were included as representative examples of Hall's (1993) three types of *distortions* (Babbie, 2008; Gay & Weaver, 2011; Gilbert, 2008). For example, we chose the federal initiatives to develop the *Dominant-Hegemonic* distortion section because, in

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analyzing the data, we identified patterns between these initiatives and the dominant-hegemonic category as described by Hall (1993) that helped to better explain these patterns with regards to the policy generation process. With the following sections, we provide more details pertaining to the findings from each of these steps as part of the analytical process for this work.

Common Features of the Data and Legislative Audiences

With this section, we present several examples, at both the federal and state levels, that are consistent with our previous study's findings and that are representative of Hall's (1993) concept of *distortions*. To begin, we describe several key features of the data, especially those related to the audiences to which each directive is addressed, as this will impact the ways in which specific messages are encoded/decoded. Next, we present several examples of how the process works at both the federal and state levels. We conclude with discussions of the ways in which these processes contribute to the distortion of specific diversity policy messages, which ultimately dictates how those policies are implemented at various institutional levels. Certainly, there is overlap, as this process is dynamic and inter-related; however, for the sake of organization, we present the analyses separately.

Legislative Audiences

The federal documents that we investigated revealed two main patterns that are aligned with our previous study's identified themes: *diversity as a democratic input* versus *diversity as an economic input* (Arce-Trigatti & Anderson, 2018). The divergence of these patterns is dependent primarily upon the audience to which the specific diversity initiatives are directed, i.e. when the Department of Education (DOE) outlines diversity initiatives for a general American audience versus when the DOE outlines diversity initiatives for state legislators and policymakers. Regarding the former, when DOE authored diversity initiatives targeting a generalized American audience are outlined, the term is often compounded with the multiple racial and ethnic pluralities that exist as part of the nation's demographic makeup. When diversity is utilized in conjunction with the racial and ethnic variability of the nation, it is, in turn, associated with the positive societal, democratic, and economic implications of inclusion (U.S. Department of Education, 2014). Due to these observations, diversity initiatives coming directly from the DOE are closely linked to the theme of *diversity as a democratic input*. Within the latter, when the DOE outlines diversity initiatives that are directed towards state legislators and policymakers, the term diversity is more often compounded with the economic benefits of minoritized student integration, college readiness, and overall academic achievement. In accordance, federal calls for diversity policy at the state level are more aligned with *diversity as an economic input.*

State responses to these federal diversity initiatives are aligned with the ways in which the initiatives are being tailored to the legislative audience of this group. Specifically, within the state diversity policy initiatives, three major sub-themes were observed that aligned with *diversity as an economic input*: *diversity of needs, diversity of ideas (collaboration),* and *diversity as cultural.* With regards to the first theme, state proposals often describe minoritized student populations (e.g., African American, Hispanic, etc.) in terms of their *diverse needs* within educational contexts. When defined in this regard, diversity becomes a challenge that demands extra attention (i.e., funding) to help improve educational attainment and achievement for the student populations who manifest these needs. As such, this depiction of diversity carries negative connotations. The second theme, *diversity of ideas*, depicts diversity in a positive light in that it embraces collaboration with various people of authority to address the aforementioned issue of *diversity of needs*. Third, the theme of *diversity as cultural* reflects a close approximation to the racial and ethnic definition highlighted above with the federal government's concept of diversity—however, within state proposals, it is often described as

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something larger than race or ethnicity, encompassing languages, customs, and religious affiliations that are a reflection of a larger, globalized populace. In turn, state proposals designed to improve outcomes for diverse student populations are compounded with the economic benefit the states stand to gain with the integration of expanded minoritized populations into the workforce. Ultimately, then, as the support for diversity initiatives in the form of grants and proposal calls from the federal government are more aligned with the theme of *diversity as an economic input*, so, too, are state proposals and their answers to this call.

Distortions

Existing diversity reforms have hitherto been described according to the audiences to which they have been directed. With this section, we investigate the fate of diversity education policy utilizing Hall's (1993) *four-stage theory of communicative exchange* and, consequently, what he refers to as message *distortions*. Through these theoretical tools we evaluate the misalignment between various diversity reform initiatives and their actual implementation at both the federal and state levels. One of the most telling aspects of the examples in this section are the references to a neoliberal framework in which most of the diversity-related messages are being decoded (Hall, 1993; Hursh, 2007). Thus, regardless of the message or the rhetoric being employed as part of the larger diversity initiative, the messages are distorted at the interpretation stage via an alternative framework to which the audience is likely more accustomed (Hall, 1993).

Dominant-Hegemonic Code: Federal Initiatives

Our first example of Hall's (1993) *distortions* within diversity education policy regards federal initiatives for increasing minoritized student populations' engagement and achievement levels. Although the term diversity is not necessarily transformed, as it still refers to race and ethnic composition within these initiatives (dominant-hegemonic coding), its derived benefits and purpose within educational reform contexts shift with every policy response to these initiatives (negotiated code). Executive Order 13555, known as the White House Initiative on Educational Excellence for Hispanics, is one example of this as it comprises a diversity policy initiative sponsored and endorsed at the federal level. This executive order is a continuation of a twenty-five-year-old initiative that has helped Hispanic students gain access to federal resources in an effort to improve this student population's educational attainment and achievement levels (The Department of Education [DOE], 2010, 2016b). Through the opportunities outlined in this initiative, Hispanic students gain access to social, civic, and economic opportunities that might otherwise be outside of their reach (DOE, 2010, 2016b). Specifically, the White House release reporting on this initiative states that the purpose of signing the continuation of this initiative is for the following to occur:

> Implementing successful and innovative education reform strategies in America's public schools to ensure that Hispanic students receive a rigorous and well-rounded education and have access to student support services that will prepare them for college, a career, and civic participation. (DOE, 2010, p. 4)

Again, diversity within this initiative is defined as racial or ethnic diversity, and its overarching objective is motivated by the resultant ideal that such educational aid will *help our nation move forward*. The initiative, therefore, is described by the DOE in terms of the multiple benefits that it offers, including those that are educational, economic, and civic in nature.

Arne Duncan furthers this point with his comments concerning the Teacher Diversity initiative, Teach.org, a program sponsored by the Department of Education that aims to highlight the great need for teachers of color within the American school system. With respect to the

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objective and importance of integrating more teachers of color into this system, Duncan responded with the following:

> Well, so this is one, when I ran the Chicago public schools, you could go into some elementary school and see no men of color, and see, sometimes, not enough teachers of color, and we want great teachers in every classroom, great principals in every school, I just want that great talent to reflect the great diversity of our nation's school children. (DOE, 2014a, minute 0:58)

Here, Duncan frames the lack of teachers of color within American schools as a social justice issue that is detrimental for a diverse student populace (DOE, 2014a, minute 1:20). He furthers this point by stating that the number of minoritized teachers currently working in schools is, "nothing we should be proud of" (DOE, 2014a, minute 1:25). All students, and especially students of color whose identities might depart from whitestream norms that are perpetuated in public schools, need teachers who relate to their unique identities, who are strong role models, and who better represent the "rich diversity" encompassed in our national fabric (DOE, 2014a, minute 1:25). As education is the vehicle that can assist students to excel not only socially, but civically and economically, Duncan emphasizes that teachers of color are especially invaluable to the success of American, minoritized students, who may enter the school system with less resources, fewer social supports, and limited educational opportunities as compared to their white counterparts (DOE, 2014a, minute 2:30).

This parallel is reflected in state level proposals as well. When *diversity* is included as a core element of state level policy proposals, racial and ethnic diversity is compounded with the economic benefits of having a more diverse workforce. For example, a Colorado federally funded proposal entitled, "Colorado Mountain College *Si Se Puede* Promise," focuses on how best to assist Hispanic students' entrance into the workforce in order to address a federal call to strengthen the nation through local economies (DOE, 2014b). Specifically, the goal is "to provide assistance to a minimum of fifty Hispanic/Latino students a year, for at least three years, to recruit, retain, and help them gain improved English skills, career training, and college completion" (DOE, 2014b, p. 6). Another example is embodied in a Texas proposal whose overall objective is to help senior level, minoritized high school students have a "better chance at earning a college education and launching a successful career" (DOE, 2014b, p. 4).

As illustrated, federal diversity policy initiatives explicitly connect the term diversity with the nation's racial and ethnic makeup (National Coalition for School Diversity [NCSD], 2012). Specifically, these initiatives are defined as those that, "promote student diversity, including racial and ethnic diversity, or avoid racial isolation" (NSCD, 2012, p. 75). Acknowledging the importance of the racial and ethnic diversity of our nation, policy initiatives at the federal level outline three important consequences of appreciating and promoting diversity at the school level: 1) to promote cross-racial understanding; 2) to break down racial stereotypes; and 3) to prepare students for an increasingly diverse workforce and society (DOE, 2016a, 2016b, 2017; NSDC, 2012). Although the last aim of the federal government—to prepare students for an increasingly diverse workforce and society—is associated with an economic understanding of diversity, when paired with the other two objectives, the initiatives aim to address social justice issues that exacerbate the inequities, both social and economic, faced by American, minoritized student populations (Spring, 2015). Thus, the term diversity becomes simplified as an all-encompassing panacea for social ills associated with race or ethnic strife.

We argue that the discourse surrounding diversity as racial and ethnic diversity associated with socioeconomic benefits is the discourse that dominates most educational policy reforms associated with the term (Arce-Trigatti & Anderson, 2018). Moreover, it is the narrative that state

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policies follow when attempting to implement diversity policy reform within education. Due to its alignment to the dominant discourse on diversity, we offer that this is a dominant-hegemonic coding that is occurring between the federal and state levels. However, we also believe that this is a *distortion* of what diversity initially means and how it is compounded with economic benefits: that is, *diversity*, as it pertains to race and racial relations in its importance to social justice and civil liberties becomes often overlooked by federal initiatives that place priority on the economic benefits of such diversity (NSCD, 2014). For example, at the same time that diversity refers primarily to racial/ethnic diversity, and so represents the dominant-hegemonic understanding of the term, its additional association with various economic benefits (as opposed to democratic benefits that characteristically reflect federal diversity-related messaging) opens up the possibility for more negotiated coding, thus constituting the possibility of additional policy message distortions (Hall, 1993). In this scenario, the intended meaning of diversity as it relates to issues of social justice and civil liberties is short-changed by a more simplified version of diversity related to economic supports and the promise of social, upward mobility (Manna, 2011; Spring, 2015).

Negotiated Code: Discretionary Grant Program Example

Our second example is at the federal level that specifically targets the language of the Discretionary Grant Programs addressing diversity reforms for K-12 education. Discretionary Grant Programs, as defined by the DOE, are federal grant programs that, unlike a traditional formula grant, are aimed at addressing a specific issue pertaining to education, are competitive in nature, and require review by a full departmental committee (DOE, 2017). Since December 15, 2010, the DOE has permitted a funding preference for a discretionary grant program designed to promote, "student diversity, including racial and ethnic diversity, or avoid racial isolation" (NSCD, 2014, p. 4). Further, despite legal pushbacks to the use of race- or ethnicity-based initiatives at the postsecondary level[5], the DOE continued to promote Discretionary Grant Programs aimed at enhancing diversity defined in terms of race and ethnicity (DOE, 2017, 2016b). A joint letter posted by the Department of Education—Office of Civil Rights and the Department of Justice—Civil Rights Division (2014) provides evidence to this:

> The Departments of Education and Justice strongly support diversity in elementary, secondary, and higher education, because racially diverse educational environments help to prepare students to succeed in our increasingly diverse nation. The educational benefits of diversity, long recognized by the Court and affirmed in research and practice, include cross-racial understanding and dialogue, the reduction of racial isolation, and the breaking down of racial stereotypes. Furthermore, to be successful, the future workforce of America should transcend the boundaries of race, language, and culture as our economy becomes more globally interconnected. (p. 1)

However, within that same year, just four years after the program was initiated, it became evident that such programs had a proclivity towards awarding projects that specifically enhanced diversity as defined by socioeconomic status rather than racial or ethnic diversity (NSCD, 2014).

To further this point, a National Coalition for School Diversity (NCSD) report (2012) emphasized the existence of updated federal regulations for discretionary grant programs that outlined a new diversity preference as one of sixteen competitive funding priorities comprising the Federal Register notice. In spite of being a diversity initiative, the notice indicated that proposals

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[5] Clear examples of this encompass relatively recent rulings on the use of race in college admissions applications as defined by *Gratz v. Bollinger* (2003), *Grutter v. Bollinger* (2003), *Fisher v. University of Texas at Austin* (2013) and *Schuette v. Coalition to Defend Affirmative Action* (2013) (Smith, 2013).

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could instead address sixteen alternative elements. Moreover, despite moving forward with a diversity initiative as a competitive point for state discretionary grant program applications, the call for proposals did not explicitly require that diversity (i.e., racial, ethnic) as an initiative be included within the application, nor did they award high points in the application if it was included (DOE, 2012; NCSD, 2012). In another report, a research committee from the University of North Carolina investigating this trend stated: "while we support the [DOE'S] desire to reduce concentrated poverty in our schools, success in creating truly integrated learning environments requires federal policy which promotes racial diversity, as well as socioeconomic diversity" (NSCD, 2014, pp. 4). Ultimately, what these reports offer is insight into the preferences and values that the DOE endorses through their funding of certain projects as they relate to this more narrowly defined version of diversity.

Such preferences were consolidated when the same Discretionary Grant Programs for diversity began to define diversity solely in terms socioeconomic status. For example, in a more recent description of the Discretionary Grant Program for Diversity and Opportunity, the DOE (2016a) posted the following:

> A growing body of research shows that diversity in schools and communities can be a powerful lever leading to positive outcomes in school and in life. Racial and socioeconomic diversity benefits communities, schools, and children from all backgrounds. Today's students need to be prepared to succeed with a more diverse and more global workforce than ever before. Research has shown that more diverse organizations make better decisions with better results. The effects of socioeconomic diversity can be especially powerful for students from low-income families, who, historically, often have not had equal access to the resources they need to succeed… In light of this growing body of research on socioeconomic diversity, [the DOE] has undertaken new efforts to support this prioritization in a number of ways. (p. 1)

Thus, despite an allusion to diversity as defined by both racial and socioeconomic criteria, only the latter is being supported within the overarching discourse of the description.

Employing Hall's (1993) notion of *distortions*, then, what can be inferred by these drastic changes in the definition of diversity within the same DOE Discretionary Grant Programs for diversity is an encoding/decoding anomaly in the translation of the dominant message. During the production stage, the message of such grants was clear: the funding would be awarded to those proposals that focused on promoting diversity as defined in terms of race and ethnicity (DOE, 2017, 2016a; Hall, 1993). However, within the circulation stage, the dominant message was interpreted according to a negotiated framework—as some proposals aimed to link diversity of race/ethnicity to socioeconomic status, and these proposals won viability within the committee linked to the funding. Ultimately, the dominant message of *diversity as race/ethnicity* became re-interpreted and equated with *diversity as socioeconomic status* (DOE, 2017; Hall, 1993). In turn, the intended message initiated at the production stage was consumed within this alternate, negotiated framework; this later interpretation was what eventually became permanent within the reproduction stage of the DOE's overall message (DOE, 2017; Hall, 1993). Arguably, diversity as racial and ethnic—which has more ties to issues associated with social justice and civil rights—has become distorted and ultimately subdued by a category which has more associations with neoliberal notions of efficiency and effectiveness (i.e., *diversity as socioeconomic status*) (Arce-Trigatti & Anderson, 2018; Hursh, 2007). The results have hitherto proven to be negatively impactful for the student populations whom these programs were intended to assist (Clark, 2011; NSCD, 2014).

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Global Translation Code: State Level Proposals

In these state level examples, we observe state proposals utilizing diversity within an alternative reference framework that includes a different definition that benefits the state's specific financial interests. In this respect, it is possible to argue that such proposals are being communicated through what Hall (1993) refers to as a global translation: that is, the state representatives understand both the literal and connotative codes embedded within the larger, federal diversity initiatives; however, they are choosing to encode this message within a preferred, alternative framework that better suits their context. Consequently, unlike the federal level example where the distortion regarding diversity was associated with a negotiated code at the initial production stage, with state proposals it would appear that the lack of equivalence between an outlined definition of diversity at the federal level (i.e., race or ethnicity) and how it is understood at the state level (i.e., flexible) has fostered a larger distortion of the term (Hall, 1993). In these examples, we see states re-defining *diversity* with such notions as *diversity of learning ability, diversity of ideas, and diversity of needs* (Arce-Trigatti & Anderson, 2018). In this regard, we argue that state proposals are responding to federal messaging regarding diversity initiatives utilizing an alternative framework, wherein the term purposefully refers to a different definition (including, for example the diversity of needs, ideas, and collaborators) to replace the original, literal or connotative codes (i.e., racial or ethnic diversity).

For example, within the state proposals reviewed for this study, diversity is commonly replaced with some proxy definition that promotes a potential economic benefit for the state. A clear illustration of this is when the term *diversity* within the California Race to the Top, Early Learning Challenge Report (2013) specifically refers to minoritized student populations' unique learning and educational needs. Within this report, in particular within the presented analysis and rationale for the continued federal funding of the state's initial project, the authors explain that a "one size fits all" model does not work in a state where "every child has diverse needs" (California Department of Education [CDOE], 2013, p. 6). In keeping with the language of the *RttT* grant, the state policymakers further label these diverse needs as "challenges" that deserve specific attention, and thus funding, in order to remedy the economic and social disadvantages that these populations face (CDOE, 2013, p. 7). The definition of diversity is thus altered and reframed within the context of students' learning abilities (i.e., challenges) (CDOE, 2013, p. 7).

In addition, when state proposals delve into how they will address these diverse needs, the term diversity takes on a new definition: diversity of ideas, opinions, and ultimately, complex collaboration systems. With respect to *diversity of ideas*, this theme is often linked positively to the exchange of best practices, an alternative to the "one model fits all" system mentioned above, and a more culturally responsive approach to education reform (CDOE, 2013, p. 6). For example, Massachusetts' (2013) request to amend its approved *RttT* grant project provides an example of the state's use of *diversity of ideas* as a form of best practices to address the *diversity of needs* encompassed by minoritized student populations. The primary objective of the amendment letter was to request funding for a "task force comprised of internal and external stakeholders, including experts in diversity and/or education,"—an idea that resulted from the 2010 diversity summit organized by the State through their initial *RttT* funds (Massachusetts Department of Education [MDOE], 2013, p. 2). Moreover, the task force is described as instrumental in that it would improve how the state addressed current educational issues linked directly to minoritized students:

> In Year 3, the task force will review the current initiatives and work underway in Massachusetts' LEAs and the data regarding the State's workforce diversity and disproportionate use of out of school suspensions for African American and Hispanic students. The task force will also identify best practices to increase diversity throughout the educator career continuum and decrease the proportionality gap in

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> the state average of the number of out of school suspensions for Hispanic and African American males as compared to White students. (MDOE, 2013, p. 2)

Another example is encompassed in California's [CDOE] (2013) report in which the state's funding bid for a Regional Leadership Consortia describes *diversity of ideas* in similar language. In particular, the proposal for continued support for the Consortia is linked to the "important and valuable contributions" provided by the various stakeholders that help the state to understand and address minoritized student needs (California, 2013, p. 6).

State proposals designed to improve outcomes for minoritized student populations are, additionally, compounded with the economic benefit the states stand to gain with the integration of a larger, minoritized population into the workforce. For example, Florida's 2011 Race to the Top proposal application reveals another example of how policy initiatives compound minoritized student populations with a diversity of needs (Florida's Department of Education [FDOE], 2012). The Florida proposal uses language like, "the courage to reform" and to take on issues like "increased student achievement, particularly for minority students" as indicators of the complexity of the needs associated with minoritized students, as well as the urgency required to address these needs (FDOE, 2012, slide 4). A federally funded Texas proposal entitled, "Austin Partners in Education College Readiness Program," furthers the association of minoritized students with diverse needs by linking these needs with students who become "at-risk" of not graduating or gaining college enrollment (DOE, 2014b, p. 4). Similarly, a federally funded California proposal, titled "California State University, East Bay Hayward Promise Neighborhood Apartment Community Commitment," outlines a few of these diverse needs as follows: early learning services, parenting classes, preschool, medical services, and literacy programs (DOE, 2014b, p. 5).

As noted, the interpretations of the *diversity* in these state level proposals are proposing alternative interpretations of the term within an alternative framework that better suits the argument proposed by the interpreter (Hall, 1993). At times, these interpretations may be aligned with the original literal or connotative codes provided by the author's (i.e., federal government's) intended definition; however, the translated definition is not necessarily negotiated, but rather it is being interpreted within a different framework entirely (e.g., the idiosyncratic ways diversity is defined via states' interpretation of the term within their own contexts). By redefining diversity in terms of *diversity of learning ability, diversity of ideas,* and *diversity of needs*, these state proposals are impacting the policy formulation, implementation, and legitimation processes with regards to the original problem-definition and agenda-setting phases initiated at the federal level. Effectively, as Lindblom and Woodhouse (1993) proposed, the problem and solution are redefined and aligned to serve the audience's interpretation rather than the intended, original role or a negotiated compromise.

Discussion

We have heretofore described what we have identified as an overall lack of definitional clarity regarding what actually constitutes diversity. Although the term is often interjected into the discourse regarding education policy as needing to be promoted and accepted, the ways in which it is conceptualized within this context is seldom informative (Arce-Trigatti & Anderson, 2018). This is further complicated by the distortions that alter and obscure the term as it is translated into digestible diversity policy and precludes policymakers from constructing effective diversity-related reforms. Despite the reality that diversity is complex, layered, and not monolithically representative of students' experiences and identities, policymakers characteristically try to narrow it, compartmentalize it, and standardize it, the ultimate outcome of which is the overall dilution of its

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potential. Perhaps the critical question then becomes: who benefits from the definitions that we use? Certainly, there are clear power dynamics at play here. In a previous study we identified two primary understandings of diversity (economic vs. democratic input) (Arce-Trigatti & Anderson, 2018). With this study, we see that these sometimes overlapping understandings become distorted and diluted at the policy implementation stage, making the construction of meaningful and effective diversity policy exponentially more challenging. Similarly, when the term is encoded/decoded according to specific audiences, the policies characteristically lose their focus. For example, when diversity is conflated with its perceived economic benefits, its transformative social justice potential is obscured, if not lost altogether. In particular, we argue that because of its constant association with economic inputs, diversity is conflated with the notions of increasing human capital as a means to increase economic advantage in a way to leverage social injustices. In accordance, policy initiatives and proposals conceptualize diversity as an object: something tangible that can be manipulated, acquired, and transformed to fit the economic needs of a particular population. The narrow positioning of diversity as a consequence of socioeconomic integration is a clear example of this phenomenon.

This is especially true within a discourse that promotes the values of neoliberal reform (Hursh, 2007; Manna, 2011; Spring, 2017). Neoliberal reformers, who appeal to such characteristically American traits as individual freedom, meritocracy, and the exceedingly close relationship between economic activity and social mobility, have dominated the educational discourse since the 1980s (Ellison, 2012). Because such reforms are able to capitalize off of their contention that individuals, acting in their own self-interests, will improve schools by introducing market-based competition, the argument for efficiency and effectiveness has become entrenched in school culture and education policy reform (Hursh, 2007; Manna, 2011; Noddings, 2007). This was true under the Obama administrations when this research first commenced, and it will undoubtedly be true under the Trump administration, whose Secretary of Education, Betsy DeVos, is an avid supporter of neoliberal reform (economic understanding) (Spring, 2017). This is further compounded by this administration's overall rejection of multiculturalism and diversity initiatives, which leads us to believe that democratic understandings of diversity will become increasingly marginalized and certainly that diversity policy will lose much of its social justice scope, if not disappear entirely (Ng & Stamper, 2018; Spring, 2017). Overall, we see the dilution and distortion of diversity priorities, initially conceived in terms of their ability to produce democratic gains, as they are digested into specific diversity policies by policymakers who interpret them according to a narrow set of economic interests. Rubrics and checked boxes, then, become the natural consequence of our existing policy landscape that favors neoliberal reform.

Conclusions

The purpose of this study was to better understand how education-based diversity policy is being understood at various levels within the context of policy development and implementation. Specifically, our aim was to document the "politics of discourse during policy implementation" utilizing the theory of encoding/decoding as a framework for understanding this process (Hall, 1993; Taylor, 1997, p. 29). Utilizing a primarily theoretical approach to analyze archival data bounded by both historical and societal constraints, we explored how Hall's (1993) *four-stage communicative theory* and concept of *distortions* can be applied to education-based policy initiatives produced at the federal level. In this analysis, we illustrated the applications of this theory to educational policy interpretations and translations as they manifest in the forms of three different codes: dominant-hegemonic, negotiated, and global translation (Hall, 1993). As the archival data utilized for this study is bounded by particular historical (2008-2016) and societal (the Obama

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administration) constraints, we acknowledge the limitations that such an analysis can provide with regards to generalizability and transferability (Harland, 2014).

However, the theoretical application of Hall's (1993) *distortions* does provide insight into the power dynamics involved in the production, interpretation, and implementation of policy at various levels. For example, it is clear that the definition and conceptual crux of the term diversity as it is utilized in policy is distorted to fit the needs to the audiences interpreting the policy. The overall outcome of this is the oversimplification of complex and systemic realities that inform schooling processes. For example, when complex concepts are integrated in education as central elements of reform, their complexity typically becomes structured around the discourse of efficiency and effectiveness, which standardizes concepts using simplified, observable measures (Bowen, Kurzweil, & Tobin, 2005; Magnuson & Waldfogel, 2008; Manna, 2011; Spring, 2017). Clark (2011) furthers this point in her analysis of such federally funded diversity initiatives affecting Southern Nevada postsecondary institutions in what she calls the "diversity-but-not-equity" priorities impacting higher education as it pertains to this context (Clark, 2011, p. 57). These policies, according to Clark (2011), ascribe to the idea of the superficial intermingling of racial groups in an attempt to comply with diversity legislation, despite what might actually be better for these groups regarding education and socioeconomic opportunities. She states:

> While the thoughtful and comprehensive integration of diversity efforts has always been a long-term goal of the work, casting this work as either pull-out or infusion—when it should always be both—sets up an unnatural dichotomy. (Clark, 2011, p. 57)

This unnatural dichotomy—which Clark (2011) labels the "diversity penalty versus the pro-white bonus"—usually ends with minoritized students being negatively impacted, when, in actuality, they should be the ones benefiting from diversity policies (p. 58). Ultimately, then, how diversity is being defined and positioned in educational discourse is primarily economic in nature, though democratic in context.

This juxtaposition compounds and misplaces the efforts made on behalf of policymakers and authors that aim to reinforce the value of diversity as a democratic construct. One potential solution to this lies in a reconceptualization of the policy evaluation phase, wherein the outcomes of policy measures are not only defined by how policies are legitimized and implemented, but also how the original author defines the problem and sets the agenda according to which the issue will be addressed (Lindblom & Woodhouse, 1993). However, this would also entail the formulation of a bounded definition of diversity that is also clearly communicable at the audience level (Hall, 1993). Another potential solution would be to expand the cadre of policy-actors to incorporate more diverse perspectives in the whole of the policy-making process. At present, the policy landscape is saturated with actors (e.g., from government, business, think tanks, etc.) who advocate for policies consistent with neoliberal reform trends. To complicate matters further, these actors are often far removed from the daily realities that inform education outcomes (Ellison, Anderson, Aronson, & Clausen, 2018). Certainly, the perspectives of students, teachers, and communities are deserving of inclusion in conversations about what they, not policymakers, will experience in schools; yet, these are the same perspectives that are characteristically marginalized in larger reform debates. We contend that a more diverse and inclusive policy landscape has the capacity to alleviate some diversity-related distortions as policy messaging matriculates through the policymaking process.

Finally, we argue that more work investigating policy distortions at various levels of governance and the impact of these interpretations at the state and local levels is warranted. More policy interpretations from other states and gubernatorial localities would certainly extend our comprehension of policy *distortions* and the idiosyncrasies that may manifest due to contextual and

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societal differences that may not have been captured in this analysis. By limiting our analysis to a select few states that are represented in the data collected for this work, we could be overlooking other important patterns that could provide more insight regarding policy interpretation at various levels. Further, as our understanding of diversity and how it applies to issues of education will undoubtedly continue to expand and transform, the task at hand for policymakers is to ensure that initiatives related to these concepts are responsive and relevant to the contextual framework within which the problem is initially defined (Lindblom & Woodhouse, 1993). In turn, in order to be effective, policy responses to these initiatives need to be accountable to the initial issue and aligned with the overall diversity objective.

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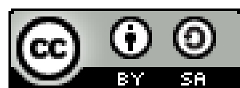

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