More Questions Than Answers: 
A Response to Stephens, Reeder, and Elder

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In responding to the papers by Stevens, Reeder, and Elder, I have organized my comments along the following questions: What is a policy-impact code? What are the problems that a code would address, and how would it address them? How does one construct such a code? What are the benefits and uses of a code? As my comments indicate, I believe there are more questions than answers in the complex field of designing policy-impact codes.

What is a Policy-Impact Code?

Although the authors address this question well, there is no consensus definition for such a code. Actually, several codes have been developed by the Economic Research Service (e.g., the Beale Code and the Bender Code). There also is the Johnson Code, McMillen and Benson’s private school code, and the code displayed in the National Center for Education Statistics’s School District Mapping Project. Moreover, the terms “classification system” and “policy-impact codes” are used interchangeably, particularly by Dr. Stephens, who refers to the application of the “classification system” and the uses to be made of “the code.”

Dr. Stephens presents four criteria for evaluating such a code: equity, adequacy, responsiveness, and appropriateness. How do these criteria apply to the currently existing classification systems and codes? It would help to know the strengths and weaknesses, advantages and disadvantages, of each of the existing systems and codes regarding these criteria in order to ascertain the need to construct new ones and/or synthesize existing ones. For example, existing systems and codes appear to relate more closely to equity. But how do they relate to the other three criteria? Also, what is their relevance to goals/.objectives/ measurement indicators and policy issue indicators? Although the causal modeling alternative indicators seem closely related, I am not as certain about the relevance of the other two sets of indicators.

What are the Problems That a Code Would Address, and how Would it Address Them?

Dr. Elder observes that, by reviewing data files in some detail, one can establish why more precise classification systems are needed for rural education. He indicates, for example, that to notice New Jersey has any rural schools requires more than a metropolitan/nonmetropolitan scheme, and to distinguish between what is rural in New Jersey and Montana requires more than an urban/rural scheme. Dr. Elder asserts that generalizations about rural education that rely on single metropolitan/nonmetropolitan or urban/rural frameworks are likely to be “off the mark.”

Dr. Stephens also identifies at least three major problems. First, in the disbursement of aide and ear-marking of rural (and urban) set-asides as part of the authorization/reauthorization of federal assistance programs, the rural share often is difficult to establish. Second, the failure to reflect the issue of rural diversity contributes to the continued formation of federal policies and practices that are subject to equity, adequacy, responsiveness, and appropriateness challenges. Unless this issue is addressed, policy makers will continue to treat rural districts as if they were a monolithic entity. Third, classification systems and policy-impact codes address several specific needs: (a) the need to provide the research community with comprehensive national and state data sets, (b) the need to develop new processes that will result in more useful

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profiles of the status of elementary and secondary
education, and (c) the need for better measurement
of the conditions of rural schools.

As a long-time student of public policy, Dr.
Stephens repeatedly calls for enhancing the quality of
the debate concerning the critical policy issues relat­
ing to equity, adequacy, responsiveness, and appro­priateness of federal initiatives. At the state level, the
need to differentiate educational policies also is noted
in the following practices used by states to provide
differential treatment of school systems: formula of
project grant efforts that benefit some districts more
than others, technical assistance and oversight efforts
that reach some districts more than others, administra­
tive waivers from compliance requirements, and tar­
ged assistance to low-performing districts. These
practices suggest the question: Can differentiation of
educational policies occur independent of classification
systems and policy-impact codes?

The use of a federal system for classifying the
nation’s rural districts would, in Dr. Stephens’ words,
“in one stroke, result in establishing a consistently
uniform system” throughout the states that would
target policies with limited resources. In short, we
would have a better sense of where to put scarce program dollars. The basic building block—a consen­sus definition of a rural district—thus would be in place
for both the federal and state policy communities to
formulate policies that reflect rural diversity. The
target audiences for such a system would be the
policy, research, and school improvement communi­
ties.

The most fundamental use of such systems, it
would seem, is for designing policy strategies that are
equitable, adequate, responsive, and appropriate.
These concerns, however, lead me to raise several
somewhat “heretical” questions. Can policies pass
the test of equity, adequacy, responsiveness, and
appropriateness without such codes? What is a clas­
sification system’s or policy impact code’s function as
a policy instrument? Or are they only indirectly related
to policy change? Also, does it cloud the issue to
address so wide a group of target audiences? Should
the focus of policy-impact codes be solely on policy
issues? Granted, there needs to be research and
development to construct such codes, but cannot
policy audiences be separated from research audi­
ences? Does each audience not have separate needs?
It seems to me that the uses of the codes are suffi­
ciently different—policy, research, and school im­
provement—to justify further exploration of these questions.

How Does one Construct Such a Code?

All three papers are highly valuable in suggesting
methods of constructing systems or codes. Dr.
Stephens’ work is a helpful mapping and analysis of
the research task before us, as well as the attending
definitional, conceptual, methodological, and policy
application issues.

Dr. Elder’s technical analysis also is helpful, for he
shows that taking both school locale and metropolitan
status into account and linking this information to
county level data adds greatly to our understanding.
He properly points out that more precise methods of
determining the location of schools are available and,
if adopted, would improve the existing schemes and
significantly enhance our understanding of the social
and economic factors influencing schools.

Dr. Reeder’s guidelines for constructing systems
or codes and his presentation on the strength and
weaknesses of selected indicators are most valuable.
However, I would add a note of caution: The need to
determine priorities for a policy-impact code depends
on which indicators are most relevant to education
policy. I would suggest that the priority factors should
include indicators that seemingly are most closely
associated with the “health and performance” of
schools: income, poverty, education (adult education),
fiscal need, and fiscal gap indicators.

What are the Major Benefits and Uses of a Code?

Classification systems and policy-impact codes,
as the three authors illustrate, can help identify the
diverse conditions and needs of rural schools. I am
most concerned, however, with policy application
issues. Dr. Stephens identifies four possible applica­
tions. First, the National Center for Education Statistics uses classification systems in its existing and
planned new data system. (This, I believe, is primarily
a research use.) Second, the U.S. Education Depart­
ment uses classification systems in administering el­
ementary and secondary school assistance programs.
(These, in my view, are research and school improve­
ment functions.) Third, other federal departments and
independent agencies also use these systems in ad­
ministering assistance programs. (These, I believe,
also are research and school improvement functions.)
Fourth, states use classification systems as a condi­
tion of eligibility. (This, I believe, is a school improve­
ment function.)
This discussion raises several additional questions. We have distinguished among projected users: the policy, research, and school improvement communities. Although all are important, I would maintain that the most important is the policy community. Classifications systems are, after all, policy-impact codes. Dr. Stephens suggests three approaches to affect policy: voluntary action, executive order, and/or congressional mandate. The National Center for Education Statistics (NCES), for example, could align its information systems voluntarily. But which system or systems would it align? At what point should this be done? Can it be done now, before a common code is synthesized or established? But what exactly would NCES be volunteering to do? Also, since we appear to currently lack consensus, what would the Executive be ordering or the Congress mandating? Cannot rural schools and communities take their case directly to the Executive or Congress in an attempt to apply the criteria of equity, adequacy, responsiveness, and appropriateness to legislation relating to rural area?

Where do we go From Here?

I believe that the immediate formation of a study panel of federal, state, and other experts to consider both the policy and technical questions presented in these papers, along with the additional questions I have raised, is absolutely essential if we are to move forward in establishing a truly useful classification system and policy-impact code.