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## Policy Implementation From a Critical Perspective: Analyzing Transfer Policy Within an Urban Technical College

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### Abstract

This study contributes to the limited research on transfer policy implementation in higher education. Using case study research design and drawing on the tenets of critical policy analysis, I examined how practitioners in one two-year college implement transfer policy. Approaching the research from a critical perspective, the findings demonstrate that transfer as a tertiary goal of the college is congruent with the lack of transfer policy visibility and implementation, which has implications for students of color. These implications are addressed and recommendations are made as to how institutions can implement policy in a culturally relevant manner to better meet the needs of minoritized students.

Established as an open access institution, the two-year college originated with the promise of a democratic education, a stepping-stone to new careers and new possibilities for its entrants. Currently enrolling over 10 million students, public two-year colleges are the critical entry points to higher education and economic opportunity for half of the nation's college students. However, two-year colleges do not bear the brunt of college enrollments by chance. Over the last 50 years, state and federal higher education policymakers have designated the two-year college to be the "main artery" for broadening higher education opportunity for all Americans. The two-year college is assigned the task of harboring a multitude of high school graduates until they are prepared to transfer to a four-year institution or to enter the job market. The philosophy behind the segmented higher

education structure is one of integration, where policymakers envisioned a system where students "can move with relative ease from level to level and from one part of the system to another" (such as a two-year college to a four-year university). Within this higher education arrangement there are, in theory, "no blind alleys" and "one can always transfer from one level to another" (Ben-David, 1974, p. 7).

Since minority students are more likely to commence their education at two-year colleges, it is believed that these colleges provide underrepresented students a "gateway" to higher degrees. However, critics argue that rather than presenting an opportunity for underrepresented students, two-year colleges lead students into a "dead end"; what critics constitute as a "form of tracking."[1] While research suggests that 30% of vocational students plan to transfer, the majority of two-year vocational programs do not provide pathways to a four-year institution but rather prepare students for positions in the labor market that generally pay less and have fewer opportunities for advancement. This is particularly disadvantageous to minorities who are overrepresented at vocational institutions.

In recent years, transfer policies have been created in an attempt to ease the transition of vocational students from two-year colleges to four-year institutions. While policymakers, higher education organizations, and academic researchers have all given considerable attention to transfer issues in recent years, none have explored how a state transfer policy is implemented by practitioners, nor how transfer policy implementation can enable or inhibit transfer equity for vocational students. This in-depth case study of an urban two-year technical college in Wisconsin, focuses first on understanding how the transfer policy was implemented, and then on understanding the policy's implementation from a critical perspective. For example, in what ways do the implementing efforts by the institution and practitioners meet the needs of a minoritized[2] population? In what ways do the implementing efforts allow the policy to act as a tool for equity?

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1    The concept of *tracking* has provided educational researchers an important tool for understanding stratification in education and has been applied to higher education by distinguishing between the two- and four-year institutions as well as between vocational and academic curricula in two-year colleges.

2    In this paper, *minoritized* refers to the objective outcome, experienced by "minority" racial-ethnic groups, of the exclusionary practices of more dominant groups resulting from historical and contemporary racism (Gillborn, 2005). The use of the expression "minoritized" in preference to "minority" reflects the ongoing social experience of marginalization, even when groups subject to racial-ethnic discrimination achieve a numerical majority in the population.

## Relevant Literature

Traditional methods of policy analysis, referred to as *rational scientific approaches*, treat policy creation and implementation as a logical step-by-step process in which facts are analyzed in order to arrive at the best policy solution. Traditional and other contemporary policy frameworks fail to capture the full complexity of policy environments and do not account for all the components that influence policy creation and implementation over time (Marshall, 1997b; Spillane, Reiser, & Reimer, 2002; Stein, 2004). Alternative models, such as *critical policy analysis* (CPA), "have been advanced to acknowledge policy as a political and value-laden process" (Allan, et al., 2010, p. 22.) Applying a critical policy analysis frame to implementation requires policy analysts to assess policy implementation by asking a unique set of questions such as: Who benefits? Who loses? How do low-income and racial minorities fare as a result of the policy's implementation? How is power manifested through policy and its implementation or non-implementation? Due to the fact that critical policy analysis was derived from an array of social science techniques it can not be easily delineated in a "step-by-step" manner (Martinez-Aleman, 2010, p. 44). For the purposes of this study, a list of suggested analysis guidelines have been arranged to assess the policy and its implementation (see Table 5.1).

A critical analysis of policy implementation can also assist in uncovering unintentional *institutionalized racism,* defined as racism that occurs in structures and operations of the college (Jones, 2000). This notion emphasizes how large scale institutional structures and policies "operate to pass on and reinforce historic patterns of privilege and disadvantage," such as deciding which groups gain access to the baccalaureate and which do not (Chesler & Crowfoot, 1989, p. 441). In this light, racism does not have to be an individual act, but is found in the "structures that determine and cyclically remanufacture racial inequity; and the institutional norms that sustain White privilege and permit the ongoing subordination of minoritized persons" (Harper, 2012, p. 10). It is important to note that institutionalized racism in the form of policy is most often unintentional. Referred to as *indirect institutionalized discrimination*, this form of racism occurs with no prejudice or intent to harm, despite its negative and differential impacts on minoritized populations (Chesler & Crowfoot,

1989). Institutional racism does not suggest that individuals are racist, but rather that the organizational polices, rules, or in this case implementing efforts, may have an indirect discriminatory impact.

Table 5.1

**Critical Analysis Guidelines**

| Critical Analysis Guideline | Type of Data Guideline was Applied to | Example |
|---|---|---|
| Attention to the difference between policy rhetoric and practiced reality (Marshall, 1999; Young, 1999). | Interview transcripts, observation notes, documents | What do the college and practitioners claim to be doing to implement the policy and what actually appears to be happening? For example, if the institution declares a commitment to transfer equity, do they mean it? Do they monitor their effectiveness in this commitment? |
| Attention to the distribution of power, resources, and knowledge (Young, 1999). | Interview transcripts, observation notes, documents | What does the distribution look like and how does it appear to impact transfer? How are structures in the institution creating opportunities for students to transfer? Are there "arenas of struggle" over resources and turf? |
| Attention to how the implementing practices of practitioners enable or hinder opportunity for students to transfer (Marshall, 1997a). | Interview transcripts, observation notes, documents | Policy can create equity, but does it? Do practitioners interpret the policy as a potential tool of equity? Is the policy implemented in a culturally responsive manner? |
| Attention to the policy's place on the list of institutional priorities (Marshall, 1997a). | Interview transcripts, observation notes, documents | How important is the policy compared to the other programs in the college? Where does the policy fit in on the agenda of the institution and that of individual practitioners? |
| Attention to "silences" or what could have been written or said or done that wasn't (Allan, et al., 2010; Martinez-Aleman, 2010). | Interview transcripts, observation notes, documents | What is left out of documents that the average reader would not notice its absence? What is missing from the website to inform students and students of color specifically about transfer opportunities? |

A critical analysis is useful because it provides a lens that helps us see the ways in which everyday policies and practices, such as those having to do with transfer, may perpetuate racial and gender inequity. For example, is the policy visible on campus? Does the institution teach students what transfer is and then guide them through the process? Does the institution encourage relationship development between students and practitioners to facilitate the transfer process? From this perspective the transfer policy can be argued to be an instrument of equity, a possible tool in reducing educational disparities in the state.

## Method

In this case study, multiple methods were used to collect data, including interviews, relevant documents, and observation, which are customary in case study research (Stake, 1995). Purposive sampling was used to identify the college under study and the participants. I selected the case based on three characteristics. The college is a two-year technical college, has implemented a transfer policy, and has a high concentration of racial and ethnic minority students.[3]

### Urban Technical College

Urban Technical College (UTC) is located in an area with high population density, is exceptionally racially diverse (see Table 5.2), is one of the poorest areas of the country, has a longstanding history of racial discrimination, and is one of the most segregated cities in the nation (Iceland, Weinberg, & Steinmetz, 2002; Lowe, 2011). The majority of UTC's programs provide (a) occupational education and training; and (b) customized training and technical assistance to business and industry (Merrifield, 2011). Other than the institution specific articulation agreements, the transfer policy—which is the focus of this study—is the only viable pathway for students to transfer to a public four-year institution.

As mentioned, UTC is exceptionally racially diverse. UTC has the highest concentration of minority students enrolled, enrolling approximately 70% of all students of color in the technical college system (Wisconsin Technical

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3    At the time the research was conducted more than half (51%) of the student body were students of color (29.5% African American, 15.3% Hispanic, 4.6% Asian/Pacific Islander, 1.1% Native American.) Data are from 2008-2009 academic year. Data include all students pursuing an associate's degree, technical diploma, or who are enrolled in basic skills. Data exclude students enrolled in pre-collegiate vocational-adult and community service programs (Wisconsin Technical College System, 2008).

College System, 2012). In addition, UTC has a higher concentration of underrepresented minority students than any other institution of higher education in the state (Office of Policy Analysis and Research, 2012; Wisconsin Technical College System, 2012). Finally, if you combine all the students of color from all the public institutions of higher education in the state, UTC enrolls a higher number. This statistic underscores the idea that earning a bachelor's degree for students of color in the state is contingent upon transferring, and specifically transferring from this college. Figure 5.1 shows that when compared to the entire UWS, UTC enrolls more students of color.

Table 5.2

**Demographic Profile of Urban Technical College**

| Profile | Urban Technical College |
|---|---|
| Total Student Population | 36,973 |
| Student Demographics | |
| Native American | 1.1% |
| Asian/Pacific Islander | 4.6% |
| Black | 29.5% |
| Hispanic | 15.3% |
| White | 46.1% |
| Unknown | 3.4% |

*Note: Data are from 2008–2009 academic year. Data includes all students pursuing an associate's degree, technical diploma, or who are enrolled in basic skills. Data excludes students enrolled in pre-collegiate vocational-adult and community service programs (Wisconsin Technical College System, 2008).*

Figure 5.1

**Number of Black, Hispanic, and Native American student enrollment at UTC and UWS, 2010. Figure illustrates that UTC has more students of color enrolled than all of the UWS added together.**
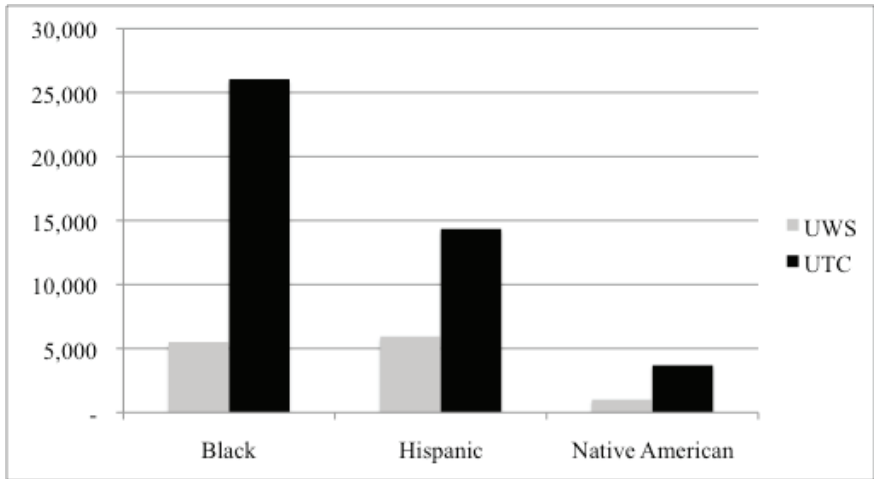


(Office of Policy Analysis and Research, 2012; Wisconsin Technical College System, 2012)

*Note: The data includes students pursuing an associate's/bachelor's degree, diploma, or basic skills. Students enrolled in vocational adult or community service coursework were excluded.*

**Data Collection**

I conducted semi-structured interviews as the centerpiece of my data collection efforts. To better understand how the policy was implemented, practitioners were asked to explain the visibility of the policy on campus, how they advise students on issues of transfer, and what programmatic efforts are in place to assist students with the transfer process. They were also asked to discuss the policy's place in the institutional agenda, and how they interact with the policy on a daily basis. I interviewed two levels of participants, external campus participants and internal campus participants, where external participants represented those not employed by the institution and internal participants were those who were either employed or previously employed by the case study institution. Participants ranged in their ethnic background and subgroup (i.e., campus board members,

administrators, faculty, staff, WTCS and UWS level administrators, UW Regents, community activists, state lobbyist, and other pertinent stakeholders). At the conclusion of the study, I had conducted a total of 72 interviews. Interview length ranged from 45 minutes to two hours, and all but one interview was audio-taped and then transcribed.

To supplement interviews, I also analyzed documents at each phase of data collection. Documents included the transfer policy, transfer guides, the college catalog, campus newspaper, as well as posters and flyers related to transfer events. Select observations were also conducted over the time frame of a month-long site visit. The goal of the observations was to better understand the campus culture, how the transfer policy is enacted, as well as the saliency of race in transfer. I observed counseling sessions between students and counseling staff (with consent of both parties) as well as administrative meetings pertaining to transfer.[4]

## Critical Data Analysis

Data collection and analysis occurred simultaneously. As a first step in data analysis, after each interview and document review, I took reflective notes in the margins of the text, noting possible major themes as well as topics for further research and questioning. After data collection was complete, all interviews were transcribed and the interview transcripts and observation field notes were uploaded into ATLAS.ti, where they were organized following techniques for thematic analysis (Luker, 2008). As mentioned previously, I used a set of unique questions and guidelines to analyze the data from a critical perspective and organize the data into larger themes (Table 5.1).

## Trustworthiness

To increase confidence in my interpretations, I included several methodological safeguards throughout my research design. For example, I triangulated my findings by using multiple sources of data (interviews, document review, observations) to confirm emergent findings (Fielding & Fielding, 1986; Stake, 1995). I spent approximately three years charting the history of transfer policy in the state and learning about the institutional

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4    I observed the Advising Center, the Welcome Center, and the Student Union. I attended two transfer events, one transfer information workshop, and the Transfer Day, where four-year partners came to UTC to talk to prospective transfer students. Finally, I also attended a daylong meeting for the Joint UWS and WTCS transfer meeting.

context via joint system level meetings at the state level, something Becker and Geer (1957, p. 126) refer to as "intensive, long-term involvement."

## Findings

The findings of this study provide insight into transfer policy implementation when analyzed from a critical perspective. When considering how the transfer policy is implemented, I chose a broad definition of implementation by including institutional and individual efforts directed at transfer as evidence of policy implementation. I approached learning about transfer implementation by attempting to understand how the institution and practitioners teach their students about transfer. What policies, programs, or other efforts are in place to help students learn about transfer and the transfer process? In answering this question, I found two levels of policy implementation. First, the policy was implemented at the *structural level*, which includes the formal implementing efforts taken by practitioners. This level includes all formal actions taken by the institution to implement transfer, including the creation of transfer policies and programs aimed at increasing the ease by which students transfer. The structural implementation efforts are divided into actions at the physical, documentation, and digital levels of implementation (see Table 5.3.) Second, the policy was also implemented at the *informal level*, which includes actions taken by individual practitioners to promote the transfer function and aid in the successful transfer of their students. In the following section I provide a composite of the policy implementation environment based on both the structural and informal levels of policy implementation.

Table 5.3

**Structural Level of Policy Implementation**

| Physical Level of Implementation | | |
| --- | --- | --- |
| **Programs/Events** | **Human Resources** | **Print/Promotional Materials** |
| • Transfer Days (2 times a year)<br>• Transfer Workshops (2 times a year)<br>• General UTC Open House | • Counselors<br>• Faculty Advisors<br>• Student Service Specialists<br>• Specific Four-Year Partner Transfer Specialist | • UTC Transfer Guide<br>• Catalog<br>• Posters/flyers to advertise programs and events |
| **Digital Level of Implementation** | | |
| • Transfer Website<br>   • Curricular requirements for the primary and new online accelerated transfer degrees<br>   • Transfer contacts at nearby four-year institutions<br>   • ***Articulation agreements ( >435 agreements, 2 guaranteed transfer agreements)***<br>   • *Guaranteed transfer contracts and information*<br>   • Link to the Transfer Information System<br>• Email blasts to liberal arts and sciences students<br>• Other online transfer resources | | |

*Note: Articulation agreements and the guaranteed transfer contract information are italicized because both are part of the documentation level of transfer. The agreements and contract are included on the Transfer Website list because students gain access to them via the website.*

### The Shadow College

In the process of documenting the structural and informal implementation efforts at the campus, select practitioners described the transfer function as a "shadow college," "hidden college," or "under the radar" within UTC. When practitioners were asked what led them to characterize the transfer function in this manner, one faculty member said, "it is because transfer is not embedded in what the college does on a daily basis." Similar comments were expressed by other practitioners, who said, "transfer happens in bursts, like the Transfer Days, but then goes away and is otherwise is not really talked about." Based on these conversations, I'm using the term *shadow college* to capture the invisibility and lack of presence of transfer at UTC. In this section, I describe aspects of UTC that have contributed to

a shadow college characterization of the transfer function. This includes a lack of transfer visibility on campus, a community perception that transfer is not offered at the college, and the outsourcing of transfer resources. Finally, I discuss the informal implementation efforts that "happen under the radar," and while valuable to student transfer, are not institutionalized or a common practice.

**A Lack of Transfer Visibility**

To understand how UTC students learn about transfer, I spent time at UTC observing student service offices, such as the Help Desk, the Welcome Center, and the Advising Center. There was a lack of knowledge and general confusion regarding transfer in each of these settings. For example, at the Help Desk the student workers available to provide information to students did not know where to send a student with transfer questions and when they phoned their supervisor for assistance he could not be located to provide further information. This observation was common across the campus and provides evidence that transfer is not visible on the UTC campus, nor is it easy to find out information regarding transfer. In conversations with practitioners, one of the questions consistently asked was, "If I was a student and I wanted to learn about transfer options, would I know where to go if I was walking around campus?" The majority of responses were similar to an administrator's comment, "I don't think so."

Additionally, there is not a central location dedicated to transfer. A student service specialist expressed frustration over the lack of a transfer center.

> The other thing we are requesting is a transfer center. It really alarms me that with all the contact and all the articulation, all the share programs, all the transfer agreements that we have with all those universities and colleges, we don't even have a transfer center where students could go sit down, do their research, talk to somebody that is knowledgeable.

A staff member speculates that UTC does not have a center because it is not an administrative priority because they are concentrated on other areas, like enrollment and student retention.

To understand transfer visibility from a student's perspective, I walked around the main campus looking for the word "transfer" or related words, like

"four-year institution" or "articulation." The only place on the main campus that displayed the words "transfer" or "articulation" was a small placard on the wall outside of the previous office of articulation. Currently, the person occupying this office is the administrative assistant to the Associate Provost. This illustrates that if students walk around campus looking for transfer information, it is not easily located by the signage posted; and, if students did locate the transfer and articulation office placard, the office lacks an advisor to assist them.

In addition, it is not apparent whom to approach with transfer related questions. Similar to the students I spoke with at the Help Desk, practitioners report that students generally find it difficult to identify a practitioner to speak with regarding transfer. Students with transfer questions can seek out one of four practitioners: a counselor, faculty advisor, student service specialist, or the transfer specialist from the local four-year institution (see Figure 5.2.) When practitioners were asked where to send students with transfer questions, they gave various responses. The most common response included referring the student to the receiving institution for advising.
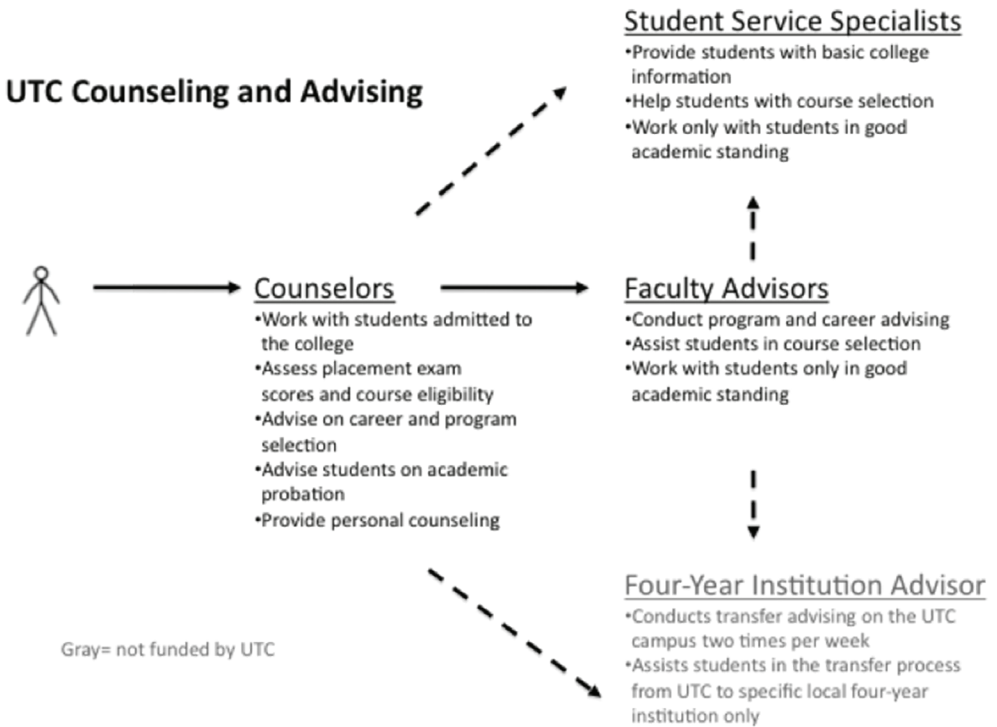
According to an administrator, campus leadership is aware that there is "confusion" in the area of advising and counseling. He said that there is a disconnect between the counselors and faculty advisors. For example, when students initially enroll they see a counselor and then they are assigned a faculty advisor. However, if the student has transfer questions, the student needs to go back to the counselor because "typically faculty advisors are not knowledgeable about transfer." Although there are some faculty members that are very knowledgeable about transfer, according to one administrator, the general consensus is that there is "a big gap and weakness in that whole faculty advising thing." Practitioners mentioned two reasons that faculty members do not advise students well in terms of transfer: faculty members are not trained in the area of transfer and many "faculty advisors don't want to do that job."

Throughout conversations with practitioners I learned that the "go to" person for transfer advising was a particular staff member. When asked, this specific staff member agreed that she is the person students should be referred to with regard to transferring in or out of UTC, although her title does not reflect an expertise with transfer students. She is also difficult for students to physically locate. Originally funded under a grant issued to the Registrar's Office, she was initially located in the records room. The door that

lead to her office said "Authorized Personnel Only." She said, "So students can't even come and see me unless I go out there and bring them back."

Figure 5.2

**UTC counseling and advising structure. Students may receive counseling or advising from UTC counselors, faculty advisors, or student service specialists. Students may receive specific transfer advising from the local public four-year institution advisor two days per week.**

**UTC Counseling and Advising**

Student Service Specialists
- Provide students with basic college information
- Help students with course selection
- Work only with students in good academic standing

Counselors
- Work with students admitted to the college
- Assess placement exam scores and course eligibility
- Advise on career and program selection
- Advise students on academic probation
- Provide personal counseling

Faculty Advisors
- Conduct program and career advising
- Assist students in course selection
- Work with students only in good academic standing

Four-Year Institution Advisor
- Conducts transfer advising on the UTC campus two times per week
- Assists students in the transfer process from UTC to specific local four-year institution only

Gray= not funded by UTC

As outlined, transfer resources at UTC remain largely hidden because there is not a central location with transfer information or an easily located or identified UTC transfer staff member. In addition, most of the transfer resources reside in the digital realm. The data presented here does not suggest UTC lacks transfer information, but rather the resources are hidden from view or not readily apparent. To access transfer resources or guidance, students must be proactive by seeking the information out on their own, knowing *who* to ask, and *what* to ask.

**An Enduring Technical Perception**

Although transfer is a function of the college, UTC's history of "strong roots in vocational education" continues to be the dominant perception in the eyes of the community and students. According to practitioners, the UTC community is not aware UTC offers a transfer option. One of the contributing reasons the transfer function remains hidden is because the community continues to view UTC solely as a "trade school," or an extension of high school, rather than an academic college. As one administrator recounts, this perception is a result of the UTC history of technical education.

> Some people you talk to believe that we should only be a technical institution and deliver technical programs. That should be our focus. And those are the diehard, I want to say old-time people, but that's probably not an accurate way to say it. That has strong roots in our community and Wisconsin's foundation and in the roots of the technical college overall. Because that is where we came from and that is what they think we should continue to do.

A faculty member said "Most people would be very surprised to find out that you could do that [transfer]."

An enduring community perception of solely technical education is also evidenced in the name of the college, "Urban Technical College." As transfer opportunities were beginning to be given serious consideration in the early 2000s, there was a campaign to change the image of the institution from a technical college to a more comprehensive community college by changing the name of the institution to Urban Community and Technical College. There were practitioners who were in favor of the change and others who were adamantly opposed to it. Faculty and staff that were in favor of the name change believed that adding "community" to the name would accurately reflect the programs offered to students. Opponents thought that a name change would alter who they are as an institution and what they practice. These practitioners have a strong allegiance to their historical identity and believe that the institution should take pride in their technical mission. Practitioners viewed this change as an attempt by outsiders to change the purpose of the institution and, in the process, degrade the value of technical education and technical colleges.

### The Outsourcing of Transfer Resources

Another reason that the transfer function at UTC is described as "hidden" or "in the shadows" is because external constituents provide the majority of transfer services. Resources such as transfer counseling, events, and publications provided to students are either created or funded by other institutions, illustrating that the responsibility for educating UTC students on transfer primarily resides with external institutions.

One of UTC's primary transfer resources is a transfer specialist from the local public four-year institution. The specialist spends two days a week on the UTC campus counseling prospective transfer students. The idea for the position was created in 2010, when UTC and the local public four-year institution were engaged in the Wisconsin Transfer Equity Study. As part of the project, focus groups were conducted with UTC students to augment the delivery of transfer resources.

> They wanted to make sure the students who want to transfer from a two-year to a four-year [institution] are successful in doing it. It came about from different kinds of student focus groups and surveys and things like that. They discovered that they needed somebody, a real live person on hand, to kind of help students in the process.

According to an administrator, one of the benefits of having this staff member on campus is that students can meet with her on campus instead of driving to the local four-year institution. Although the transfer specialist spends approximately half of her time at UTC, the transfer specialist position is entirely funded by the local four-year institution.

Although not readily apparent, there are "pockets where transfer happens." I found that transfer occurs by accident or informally, through the work of individual practitioners. For example, one faculty member in the Teacher Education Track collected her own transfer data to better understand how to support her students in the transfer process. Another faculty member ensures course alignment for students who plan to transfer by taking time from his own schedule to "sit in" on newly articulated math courses at other institutions to "double check" content alignment. These few examples provide evidence that transfer support does exist at UTC, however it is not common practice. As described by one practitioner,

transfer support is "episodic" and tends to take place when practitioners go "above and beyond" their job responsibilities.

## Discussion

Critical policy studies in the past have focused on how a policy is developed or written and how the policy itself may marginalize racialized populations (Marshall, 1997b; Spillane, et al., 2002; Stein, 2004). This study is unique in that the focus is not on the policy alone, but how the act of implementing it may marginalize racialized students. The findings suggest that a policy can act as a tool of equity, but only if implemented in a manner that enhances the opportunities for the success of minority students. More important is how the non-implementing efforts of the institution and practitioners are interconnected to broader issues of power and prestige.

### "Colorblind Transfer" Implementation

The findings of this study demonstrate a mismatch of implementing efforts and the population served. Currently, the implementing efforts at UTC support the ideology of hyper-individualism, where the primary transfer resources of articulation agreements are located in the digital realm and require proactive student engagement. Since it is not immediately clear where to learn about transfer or who is appointed to this role, students are charged with the responsibility of seeking out transfer resources and then knowing the right questions to ask. This is inherently troubling because an implementation strategy focused on an ideology of hyper-individualism or one that lacks the relational element is at odds with effective support strategies identified for students of color (Rendón, 1994, 2002; Swail, Cabrera, Lee, & Williams, 2004).

As mentioned previously, UTC enrolls more students of color than all public institutions in the state combined (Office of Policy Analysis and Research, 2012; Wisconsin Technical College System, 2012). Researchers have found that the success of students of color and first generation students in completing a course of study and transferring to a four-year college is supported when relationships with faculty, counselors, and other staff are established (Bensimon & Dowd, 2012; Dowd & Pak, 2013). Interactions with practitioners may help first generation students navigate complicated academic procedures, such as the transfer or application processes, as well

as validate students' education aspirations and alleviate fears of isolation. Low income and racially diverse students are unlikely to possess a clear understanding of how to negotiate the college environment. As a result, when students encounter multiple academic options, they are often confused by the process (Alfonso, 2004; Person, Rosenbaum, & Deli-Amen, 2006). According to Rendón (2002), students from low-income backgrounds or who are first generation often do not know what questions to ask and are often reluctant due to a fear that they will appear "stupid or lazy" (p. 645).

According to a faculty member, UTC has "colorblind transfer," meaning that the manner in which the transfer policy is implemented at UTC is at odds with what the literature says supports students of color and first generation students. First, students at UTC that want to learn more about transfer have to know where to go and what questions to ask. If the student happens to find someone to speak with regarding transfer, he or she is then told to contact or visit the four-year institution they wish to attend for counseling.

Second, the online medium by which the majority of transfer resources are delivered is not conducive to promoting relationships. When students visit the UTC website they are confronted with a proliferation of articulation agreements. Although articulation agreements are an attempt by UTC to provide pathways for students to transfer, they have been found by researchers to "hamper" rather than assist student transfer due to a host of political issues and cause more confusion than clarity (CollegeBoard, July 2011). In addition, articulation agreements by themselves are not as useful as having a person-to-person conversation. According to Rose (2012) "information doesn't just flow and get processed in a vacuum. Information flow is embedded in human interaction and social networks" (p. 156). When students are provided opportunities to talk about information, it gets "elaborated, or legitimized" (Rose, 2012, p. 157).

This is not to say that transfer advising does not take place at UTC. As discussed, there are individual practitioners who take it upon themselves to implement transfer with their students, some specifically with regard to students of color. This finding shows that transfer happens at UTC by chance rather than by formal structural efforts. These findings echo previous research that select practitioners can act as "transfer agents" or individuals that work to facilitate the transfer of low income or racially diverse students (Bensimon & Dowd, 2009; Gabbard, et al., 2006). Borrowing from Dowd et al. (2006), I argue that transfer implementation at UTC has a "haphazard,

or accidental quality" to it. The findings of this work do not proclaim that UTC does not provide transfer resources, but rather *how* the policy is implemented is not the best strategy given their student population. The results of this work demonstrate that a policy may be implemented, but in this case, the implementation is done without a strong awareness of serving a predominately African American student body. This research highlights the notion that policy may serve as a tool of equity, but only when implementation efforts are thoughtfully designed to meet specific student needs.

## The Non-Implementation of Policy

The observations described provide insight into the non-implementation of the transfer policy and add to the literature on the critical policy analysis of implementation. Campus observations suggest a lack of information and visibility of transfer at UTC. Though these observations directly concern information and signage, they are representative of much larger issues. I argue that this non-implementation of transfer policy is a form of unintentional *institutionalized racism*. As mentioned, this form of racism emphasizes how large scale institutional structures and policies "operate to pass on and reinforce historic patterns of privilege and disadvantage," such as deciding which groups gain access to the baccalaureate and which do not (Chesler & Crowfoot, 1989, p. 441).

Indirect and unintentional institutional racism occurs in acts of omission, such as failing to have a transfer center, a designated person for transfer advising, and omitting required courses, such as math, from degree programs. Another example of omission is the resistance to including the word "community" in the name of the college. As observed at UTC and argued by Marshall (1997b), "policies will create arenas of struggle—sometimes just over resources or turf, but more often over ideology, over what is and what is not valuable and useful" (p. 7). Practitioners resisted the name change because it threatened the type of education they deliver and their livelihood, but also the ideology that UTC is first a vocational college. Although this is not overtly connected to opening opportunities to students of color, the omission of "community" has implications for the large number of students of color that UTC serves. The resistance and omission of "community" symbolizes a singular commitment to a culture that advocates

vocational education. However, given the college demographics, excluding or diminishing the transfer function serves to foreclose opportunities that lead to higher levels of education. According to DuBois (1973), offering only a vocational education to the black community is a method for the continued subordination of that community.

## Implications for Practice and Policy

This research provides evidence that how an institution implements a policy may be disadvantageous for the population served. These findings provide policymakers, practitioners, and researchers broader conclusions that may help educators understand the ways in which the everyday practices (or non-practices) of practitioners can indirectly contribute to the perpetuation of racial inequality. Based on these findings, I provide implications for practice and policy.

## Transfer as an Expectation and a Mindset

Part of implementing transfer as an expectation involves creating a "transfer-going culture." Based on the literature showing the importance of high schools developing a "college-going culture" to increase the rates of their students that go on to attend college (see, for example, McDonough, 1997), it is argued that two-year colleges that advocate transfer tend to see increases in transfer rates (Handel & Herrera, 2003). Improving student awareness of transfer requirements may encourage students to transfer, as this increases interaction and relationship-building with practitioners, effective advising for students, and well-resourced transfer centers. It may also involve the creation of professional development opportunities for practitioners that demonstrate the value of a bachelor's degree. Also important to a vocationally-oriented campus are conversations surrounding how technical programs may coexist with academic ones.

Finally, to increase transfer opportunities for students, practitioners have to perceive it as an institutional priority. Creating a transfer "mindset" should be established by the campus leadership. Leadership among the president and the Board of Trustees is important in setting the atmosphere for the college. In order to have practitioners perceive the transfer policy as a priority, the board needs to establish an agenda that includes transfer. Prioritizing transfer requires reviewing practices to observe if they support transfer,

building leadership-level (or presidential-level) relationships with four-year institutions, providing incentives for faculty to collaborate, and providing funding for resources such as a transfer center (Serban, et al., 2008).

## Culturally Relevant Policy Implementation

Two-year colleges that serve a majority minority population should consider a culturally-relevant strategy to policy implementation. Research has suggested that faculty should alter their practices in the classroom to meet the needs of racially diverse students through what is called culturally-relevant or responsive pedagogy (Gay, 2000; Ladson-Billings, 1995). Gay (2000) argues that culturally-responsive teaching empowers racially diverse students by "cultivating their cultural integrity" and validates students' background by enacting deliberate teaching strategies tailored to the group of students (p. 43). I suggest that this idea expands to policy implementation. Institutions that serve a majority minority population should address the needs of that population. For instance, a culturally-relevant strategy to policy implementation would consider the student population when developing structures for counseling and advising, curriculum, and other student services. Culturally-relevant policy implementation may provide a strategy for institutions to allow a policy to act as a tool for equity. This approach to policy implementation would require institutional leaders and practitioners to regularly assess their own implementing efforts. For example, leaders and practitioners should ask themselves the questions, "Who does or does not benefit from our implementation of transfer policy? How does our implementation of transfer policy impact students of color?"

## Recommendations for Future Critical Researchers

While the study findings provide valuable insights into transfer policy implementation from a critical perspective, the results highlight areas for future research. Goldrick-Rab and Shaw (2007) argue that more research is needed on higher education policy implementation. I argue that in addition to this idea, more higher education studies should emphasize policy implementation from a critical stance. Harper et al. (2009) argue that utilizing a critical approach to policy analysis is useful as it helps us observe how everyday practices or non-practices contribute to the perpetuation of racial inequality. This is important for multiple reasons, but most notably

due to the population two-year colleges serve. The majority of students in two-year colleges are from low- to modest-income backgrounds, work part- or full-time, and did not benefit from attending high-performing high schools. Black and Hispanic students are more likely to be found at two-year public college campuses than at four-year public universities when compared to White and Asian undergraduate students, who enroll in two-year and four-year institutions in nearly equal numbers (Knapp, Kelly-Reid, & Ginder, 2012). These students depend on two-year colleges to implement transfer policies that will serve their unique needs. The first step for researchers is to select research designs that emphasize the relationships among educational policies and historical, cultural, political, economic, and racial contexts. Second, researchers should examine two-year college policy implementation critically by considering the student perspective on implementation. Researchers should ask questions such as:

1. How does the institution make students aware of the policy?

2. How does the institution teach students about the policy?

3. What physical signs on campus indicate the policy exists?

4. How are frontline staff and student staff educated about the policy?

5. Do the implementing efforts encourage interaction and relationship building?

6. How are the beneficiaries of the policy perceived? And, how does this perception influence interpretation and implementation?

7. How does the institution tailor policy implementation to the specific context or population served?

Addressing these questions will allow institutional leaders to assess and view their policies from the perspective of the student. Only after considering how well an institution's implementing efforts align with the population they serve will students begin to benefit from well-intentioned policy.

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