Advancing a Framework of Racialized Administrative Burdens in Higher Education Policy

Denisa Gándara
The University of Texas at Austin

Rosa Acevedo
The University of Texas at Austin

Diana Cervantes
The University of Texas at Austin

Marco Antonio Quiroz
The University of Texas at Austin

Many policies in higher education are intended to improve college access and degree completion, yet often those policies fall short of their aims by making it difficult for prospective or current college students to access benefits for which they are eligible. Barriers that inhibit access to policy benefits, such as cumbersome paperwork, can weigh more heavily on members of marginalized communities, including racially minoritized students. Such administrative burdens can thus reinforce patterns of inequity. In this paper, we present a conceptual framework for examining administrative burdens embedded in higher education policies that can negatively affect prospective and current college students, especially those who are racially minoritized. With the use of our proposed framework, researchers can improve the understanding of ethnoracial disparities in higher education, inform policymakers' design of racially equitable policies for higher education, and enable practitioners to implement those policies to promote racial equity.

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Denisa Gándara
ORCiD: 0000-0001-5714-5583
Twitter: @gandaradenisa

Rosa Maria Acevedo
ORCiD: 0000-0002-6361-8735

Diana Cervantes
ORCiD: 0000-0003-3831-1122

Marco Antonio Quiroz

The University of Texas at Austin

Policies to increase educational opportunity, such as student financial aid programs, have largely failed to reduce ethnoracial[1] disparities in higher education outcomes. In 1965, President Lyndon B. Johnson signed the Higher Education Act, intended to expand postsecondary educational opportunity for those to whom it had been denied, including low-income and racially minoritized[2] individuals. Over half a century later, however, in 2021, the percentages of adults 25 and older who had completed at least a bachelor's degree were 62% for Asian, 42% for White, 28% for Black, 26% for Pacific Islander, 21% for Hispanic, and 20% for American Indian/Alaska Native students (National Center for Education Statistics [NCES], 2022a). Given the substantial benefits that individuals accrue with higher levels of formal education, these inequities remain a concern (Hout, 2012; Ma et al., 2016), not only from a socioeconomic perspective but from a moral perspective, owing to the history of racial discrimination that has produced such disparate outcomes (Martínez-Aleman, 2020).

This systemic failure to close gaps in postsecondary educational attainment across ethnoracial groups is due in part to policy design and implementation. Policies, including those intended to expand educational opportunity, often impose unnecessary hurdles or administrative burdens on individuals whom the policies are supposed to benefit. Whether intentional or unintentional, these hurdles can reinforce patterns of inequity (Herd & Moynihan, 2018; Ray et al., 2022). Administrative burdens such as income-verification requirements for student financial

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[1] We use *ethnoraciality* to refer to the interactions and ethnic structures that shape the lived experiences of social groups. This stands in contrast to more narrow understandings of racial and ethnic relations as unrelated to each other. Moreover, ethnoraciality requires greater awareness of a group's self-identification along with ways in which its members may distinguish themselves from other social groups within processes of racialization (Warren, 2020).

[2] We use the term *racially minoritized* to acknowledge that minoritization is a social process shaped by power, where ethnoracialized communities are actively minoritized by others rather than naturally existing as a minority (Benitez, 2010). In referencing racially minoritized communities, we reject essentialist views of social groups as sharing an underlying, inherent, similar nature in immutable ways (Medin & Ortony, 1989).

aid are often included in policy design to avoid or curb corruption (Goldrick-Rab et al., 2016), but they generate burdens for the individuals whom they target (e.g., students). These burdens can weigh more heavily on members of marginalized communities (Herd & Moynihan, 2018), including those who are racially minoritized (Ray et al., 2022).

In this paper, we present a cohesive framework for studying students' experiences with higher education policies by leveraging the frameworks of administrative burdens (Herd & Moynihan, 2018) and racialized burdens (Ray et al., 2022), which originated in the field of public administration. Students face numerous barriers in their pursuit of higher education that represent administrative burdens, including the application and renewal requirements for Federal Student Aid, using the Free Application for Federal Student Aid (FAFSA) form. Yet the higher education literature lacks a cohesive framework for studying these hurdles. In this paper, we focus on the problem of administrative burdens that make it harder for students to access benefits to which they are entitled, and on how these burdens may disproportionately affect racially minoritized students. That is, our conceptual framework is intended for higher education researchers to examine racialized administrative burdens in higher education policy design, implementation, and effects. To this end, we build on Herd and Moynihan's (2018) framework of administrative burdens and on Ray et al.'s (2022) framework of racialized burdens, and we situate them within the context of higher education policy. These frameworks have been used to explain phenomena in various fields (J. W. Campbell et al., 2022), but remain underemployed in higher education, despite their considerable academic purchase.

Here we are interested primarily in *public* policies, especially at the state and federal levels, although our proposed framework can also be used to study institutional policies as well. Moreover, while administrative burdens in higher education policy can negatively affect

numerous stakeholders, including those tasked with implementing policies (e.g., higher education professionals), our focus is on students—on the role of administrative burdens in thwarting college access and degree attainment. The use of our proposed framework should improve our collective understanding of how students across ethnoracial groups experience higher education policies and how those policies can contribute to persistent racialized inequities in educational attainment. We also present a research agenda corresponding to our proposed framework; insights from this research agenda can be used by policymakers and higher education practitioners to inform racially equitable policy design and implementation.

Administrative Burdens

Administrative burdens consist of bureaucratic rules and processes embedded within policy design and implementation that prevent and discourage individuals and communities who are the policy's intended beneficiaries from gaining access to public goods, resources, and services (Herd & Moynihan, 2018). They are systemically created barriers that impinge on individuals' ability to reap the benefits of designated policies (Herd & Moynihan, 2018). In higher education, FAFSA is a paradigmatic administrative burden (Dynarski & Scott-Clayton, 2006; Mungo & Klonowski, 2022). The three types of administrative burdens, or "costs" that individuals incur when they learn about or seek access to benefits for which they are eligible, are as follows.

Learning costs are the burdens associated with learning about a policy and determining one's eligibility for it (Herd & Moynihan, 2018). Within higher education, these burdens include elaborate requirements such as admissions and financial aid applications, undisclosed opportunities for fee waivers, and insufficient information regarding student support services on campus.

Compliance costs refer to the specific steps one must take to access and maintain benefits from a policy—the palpable burdens of complying with rules and requirements (Herd & Moynihan, 2018). For prospective and current college students, compliance costs may include submitting the FAFSA form for Federal Student Aid eligibility, completing the income verification process for state or federal student aid, paying (even relatively minor) fees, maintaining a minimum grade point average, enrolling for a minimum number of credit hours, and reporting U.S. residency or citizenship. These requests, which can result in interruptions, delays, and loss of benefits due to non-compliance (J. C. Lee et al., 2021; Schudde & Scott-Clayton, 2016), reflect the institutional imposition of restraints on a student's time and personal agency (Barnes, 2021).

Psychological costs are emotional burdens manifested through the stigmatization, stress, or loss of agency associated with accessing and keeping benefits (Herd & Moynihan, 2018). In higher education, the processes of financing higher education and the prospect of debt can produce steep psychological costs (Hypolite & Tichavakunda, 2019). Notably, the three types of costs are not mutually exclusive. For example, compliance costs can also constitute psychological costs when they produce stress or place onerous demands on people's time, reducing their autonomy.

A prime example of administrative burdens embedded within the system of higher education is represented by FAFSA, which produces and reinforces barriers to college access and student success (Dynarski & Scott-Clayton, 2006; Mungo & Klonowski, 2022). Every year, a substantial share of students, especially those from lower income backgrounds, forfeit financial aid funds (Kofoed, 2017; McKinney & Novak, 2015). Researchers and policymakers have argued that the FAFSA form generates high compliance costs (Dynarski et al., 2022; Murakami,

2020). The FAFSA form also produces psychological costs for some students and their family members from immigrant backgrounds, who may not be eligible for federal financial aid or are hesitant to share information due to low levels of trust in the federal government (Diaz, 2021).

A related example of administrative burdens is the FAFSA income-verification process. After completing the FAFSA form, some students are selected for a complex verification process to ensure the accuracy of the information they submit (J. C. Lee et al., 2021). During this process, students encounter compliance costs in completing the required steps, which include confirming individual and parental income (Guzman-Alvarez & Page, 2021; Graves, 2022). The verification process has had adverse effects on students' financial aid receipt and, ultimately, on their college enrollment (Guzman-Alvarez & Page, 2021; J. C. Lee et al., 2021; Page et al., 2020).

Theoretical Tenets of the Administrative Burdens Framework

Beyond identifying various types of burdens in policy design, Herd and Moynihan (2018) posit three tenets on the effects, disparate allocation, and intentional creation of administrative burdens. First, administrative burdens can negatively affect take-up and related policy outcomes. This effect applies to students' experiences with higher education policies and how those experiences are related to their postsecondary outcomes. For example, interventions have shown that even small reductions in the steps required to access program benefits can have large positive effects on college access and degree completion (Dynarski & Scott-Clayton, 2006; Klasik, 2013; Pallais, 2015).

Second, administrative burdens are more likely to fall upon and negatively affect marginalized communities (Herd & Moynihan, 2018). Policymakers often embed administrative burdens in policy designs because they make assumptions about target populations, especially

groups racialized as people of color (Soss et al., 2008, 2011). In one congressional hearing, for example, Felix et al. (2022) found that members of the U.S. Congress described student loan borrowers as financially illiterate, at risk of becoming dependent on the government, and using student loans irresponsibly ("to buy [a] fancy cellphone"). These portrayals led to paternalistic policy proposals in the hearing, which included requiring financial literacy courses and restricting the amount that students can borrow (Felix et al., 2022). This is especially notable since racially minoritized individuals are disproportionately burdened by student debt (Hanson, 2022).

Third, administrative burdens are *intentionally* integrated into policy design to discourage take-up from certain populations perceived as undeserving (Herd & Moynihan, 2018). For example, the complexity of a selective university's admissions requirements can incur significant learning and compliance costs that can disproportionately affect students from groups historically underserved in higher education. Indeed, these institutions often extend grace to alumni through a streamlined legacy admissions process. This *selective complexity*, intentionally designed to benefit a particular group of students and burden others, consists in a policymakers' ability to alleviate administrative burdens to benefit a particular group—in this case, predominantly White affluent students.

Racialized Burdens

Emerging research offers empirical evidence that administrative burdens are unequally distributed and that they intentionally target specific groups as opposed to others (Barnes & Riel, 2022; Herd & Moynihan, 2018). Consequently, scholars have begun to theorize how administrative burdens create unequal access to services across ethnoracial groups at the organizational level (Ray et al., 2022). Although our framework reaches beyond the

organizational level of administrative burdens to include policy design processes and policy language, students' experiences with policy, and students' outcomes, we draw from Ray et al.'s (2022) racialized burdens frame. Building on the theory of racialized organizations, Ray et al. introduced the concept of racialized burdens to "unpack the mechanisms by which administrative practices are racialized" (p. 2). Ray et al. bring attention to cultural norms and resource distribution at the organizational level. With a primary focus on policy implementation, this helps "to document and explain why marginalized racial groups face more significant frictions when interacting with the state" (Ray et al., 2022, p. 2). Thus, following Ray et al., we define racialized burdens as administrative practices within organizations that perpetuate racial inequalities in public services. The concept of racialized burdens sheds light on how and why racially minoritized students experience different types of administrative burdens, given the roles organizations play in shaping individuals' experiences.

The racialized burdens framework includes four tenets (Ray et al., 2022). First, racialized organizations can reduce the agency of racialized groups through the imposition of onerous requirements. Certain types of welfare programs that primarily benefit minoritized groups, for example, have higher compliance costs than those that primarily benefit Whites, such as social security and veterans' benefits (Herd & Moynihan, 2018; Soss et al., 2008). Requiring undocumented students, most of whom are racially minoritized, to complete additional paperwork is another example of how racialized organizations can diminish the agency of racialized groups by requiring those who already bear the burden of need to also grapple with challenging, onerous, time-consuming activities.

Second, burdens in racialized organizations justify the unequal distribution of resources. Selective universities have long used ambiguous measures of "merit" to legitimate racialized

college admissions patterns (Nichols, 2020; Rosinger et al., 2021). Research has shown that these criteria are negatively biased against Black students (Deil-Amen & Tevis, 2010). In addition, financial aid is often denied to students who cannot attend full-time, a requirement that can have disproportionate effects on racially minoritized students, who are less likely to attend school full-time (Shapiro et al., 2017).

Third, the framework posits that Whiteness is a credential that eases burdens. Ray et al. (2022) note that, in the aggregate, immigration policies in the U.S. have always favored White immigrant groups (e.g., Moynihan et al., 2022). A recent study has found that Black students, especially those from lower income backgrounds, received scant guidance related to college-going; the little messaging that they did receive was depersonalized and lacked specific, timely information on what was needed to apply for college (Gast, 2022). They were also subject to unclear expectations from adults in their high schools. Gast (2022) described the learning and psychological costs that Black students encountered as "complex requirements" that led to "disempowerment and frustration" (p. 56). At the same time, legacy admissions allow Whites to systematically benefit from college admissions policies and practices.

Finally, the racialized burdens framework proposes that formal rules will be decoupled from organizational practice in racialized ways. When bureaucrats have discretion over the administration of a program, White individuals receive more favorable treatment (Klain et al., 2020; Ray et al., 2022). One example of the decoupling of formal rules from organizational practice in ways that can disproportionately burden racially minoritized students is the possibility of exceptions to waivers from policy requirements. Research has shown that a bureaucrat's racial identity conditions the degree to which racially minoritized populations benefit from government services (Grissom & Redding, 2016). Evidence suggests that Black students in classrooms with

non-Black teachers are less likely to be assigned to gifted classrooms, regardless of academic preparedness (Grissom & Redding, 2016). Given what we know about racialized practices among bureaucrats, we can expect more favorable treatment for White students. Moreover, formal rules may be decoupled from organizational practice because White students are more likely to ask for exceptions to the rules, as suggested by work on race privilege showing that White people feel more deserving and entitled (Hagerman, 2018).

Ethnoracial Inequities in Higher Education

Before presenting our proposed framework, which expands on the administrative burdens and racialized burdens frameworks, we review literature on ethnoracial inequities in higher education. The purpose of this review is to illustrate how the experiences of racially minoritized students who seek higher education are distinct from those of White students and differ across ethnoracial groups. The distinct experiences of racially minoritized students in accessing and navigating higher education provide a backdrop for their encounters with administrative burdens in higher education policy. To understand racially minoritized students' experiences with higher education, one must first recognize the roles that institutions of higher education have played in reproducing ethnoracial inequities while reifying the racial order itself. Rooted in the slave economies of the colonial world, higher education institutions were built on the backs of racially minoritized communities; college founders used enslaved people to erect buildings, maintain campuses, and enhance their institutional wealth (Wilder, 2013). Further cementing the racial order, in the 18th and 19th centuries, university faculties collected and processed information about human differences from which they forged theories of biological supremacy and inferiority (Omi & Winant, 2015; Wilder, 2013). White supremacy is ingrained in the fabric of higher education institutions and manifested in various ways, from the racial/ethnic composition of

faculties (Colby & Fowler, 2020) to the privileging of racially biased standardized tests in admissions (Miller & Stassun, 2014).

Understanding the experiences of racially minoritized students is a critical first step to identifying burdensome elements of policy designs and implementation that can hinder racially minoritized students' success in higher education. Indigenous, Black, Latinx, and Asian American Native Hawaiian Pacific Islander (AANHPI) students offer predominant examples of ethnoracial groups' inequitable experiences in higher education.[3] These students' struggles inform the applicability of a racialized administrative burdens framework to study higher education policy.

The Erasure of Indigenous Peoples[4] in Higher Education

Since the late 1800s, the federal government has instituted colonial schooling disguised as education, stripping Indigenous Peoples of their tribal identities, unique histories, languages, and cultures (Brayboy & Lomawaima, 2018). Indigenous Peoples have advocated for a tribal education with increased financial support, recognition of other ways of knowing, including culture and tribal histories in the curriculum, locally embedded schools,[5] and an expanded adult and childhood education. Contrary to their calls for autonomy, the federal government has forced the assimilation of 95% of tribal students into public schools and off reservations (Cai, 2020). Colonial practices, such as the push for assimilation, have had a systemic effect on Indigenous sovereignty and their ways of knowing.

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[3] Within each of these racialized categories, there is large variation that we are unable to explore in this paper.
[4] The term "Indigenous Peoples" refers to descendants of the first inhabitants of Americas. It is capitalized because it is used as a proper noun to signify the cultural heterogeneity and political sovereignty of this group (Bird, 1999).
[5] Through locally embedded schools, tribal governments seek to directly serve Indigenous youth. Tribal organizations, like the National Congress of American Indians (2015), aim to strengthen tribal control of education, preserve and revitalize Native languages, provide tribes with access to tribal member student records, and encourage tribal and state partnerships.

Indigenous Peoples face numerous challenges in the pursuit of higher education: forced assimilation, the erasure of Indigenous history and knowledge, historical trauma, and racism, including microaggressions that challenge Indigenous identity (Garcia-Olp et al., 2022; Masta, 2018). Colleges and universities are often unprepared to understand the importance of family, home, and community for Indigenous students and to facilitate and support their familial obligations (Lopez, 2018; Tachine, 2017). Partly for these reasons, Indigenous Peoples comprise less than 1% of all U.S. undergraduate and graduate students in higher education. Of those who attend college, 20% graduate with a bachelor's degree or higher, and 12% attain an associate's degree (Postsecondary National Policy Institute, 2021).

Another barrier that Indigenous Peoples face in their pursuit of higher education is the financial cost of attending college. Indigenous Peoples have the highest unemployment rates, have the lowest employment-to-population rate, earn significantly less income, and have considerably lower levels of wealth than do other groups (Button & Walker, 2020). Moreover, Indigenous Peoples are often excluded from postsecondary and employment data and considered a "forgotten group" (Brayboy et al., 2015; Masta, 2018).

Notwithstanding the barriers Indigenous students face in their pursuit of higher education, research has identified factors associated with these students' success. Indigenous students benefit from institutional values in higher education that are consistent with their own cultural values, traditions, and beliefs (Fish & Syed, 2018). Support services that center culturally sensitive career counseling, peer mentoring, academic counseling, and community building, along with cultural centers on campus, are proven strategies to help these students succeed (Guillory, 2009; Lopez, 2018; Tachine, 2017). In sum, the success of Indigenous Peoples is

supported when their knowledge, communities, and epistemologies are recognized and cultivated.

A Perpetually Uneven Playing Field for Black Students Pursuing Higher Education

Despite incremental changes in educational policies, Black students continue to face inequities in access to and retention in higher education. Compounding factors affecting Black students' undergraduate retention and graduation include underpreparedness due to limited K-12 educational opportunities, an absence of mentorship, lack of college affordability, and, when these students get to college, a hostile campus climate (Sinanan, 2016; Winkle-Wagner, 2020). In addition to having access to inferior K-12 educational opportunities in comparison with their peers, Black students seldom have teachers who look like them, they are often subject to lower expectations from their teachers, and they are punished more frequently and severely than their White counterparts (Nichols & Schak, 2019; Owens, 2022; Williams et al., 2022).

Disparities in college enrollment also contribute to lower postsecondary educational attainment for Black students. A primary barrier to college enrollment for Black students is the high price of attending college. The cost of college attendance has soared in recent decades, and traditional sources of financial aid have not kept pace (Baum, 2021; NCES, 2022b). Entrenched by long-standing systemic racism, Black families have significantly less wealth to draw on to pay for college, creating barriers for Black communities to access higher education (Brooks & Harrington, 2021).

When Black students do enroll in college, their academic success is associated with campus climate, independently of these students' academic ability (S. D. Campbell et al., 2019; Gusa, 2010; Strayhorn, 2013). In a phenomenological review of tweets from the #BlackatPWI hashtag, researchers found that students at predominantly White institutions reported regular

incidents of racial inequities at the micro and macro levels of institutional life, including experiences with racial slurs, racially derogatory characterizations, racialized verbal attacks, avoidant behaviors, and racial invalidations in their interactions with other students, professors, advisors, staff, and some top administrators (Fields et al., 2022). Black students continue to face numerous challenges in their pursuit of education in an institution designed to exclude them.

Research suggests that to promote the success of Black students who pursue higher education, higher education institutions need professional development to disrupt anti-blackness and increase knowledge about Black students' success; partnerships with families; increased Black representation in the curriculum; increased Black educator representation; and audits to uncover institutionalized inequities (Krasnoff, 2016; Williams et al., 2022).

Racial, Linguistic, and Immigration Systems of Oppression Constraining Latinx Students' Success

Many of the systemic barriers that Latinx students experience in their pursuit of higher education are manifested through ethnoracial discrimination based on their citizenship status (Flores et al., 2022), national origin, and dominant language (García & Torres-Guevara, 2021). Latinx students have been historically underserved in K-12 schools, resulting in lower levels of college readiness and, ultimately, postsecondary educational attainment (Gándara & Contreras, 2009; C. Suárez-Orozco & Suárez-Orozco, 2001). Research shows that K-12 schools with a high concentration of Latinx students are typically overcrowded and offer substandard academic resources (Gándara & Contreras, 2009). Schooling has also been found to strip Latinx students of their cultural and ethnic identities through assimilationist policies, a process coined as "subtractive schooling" (Valenzuela, 1999).

Barriers to educational attainment follow Latinx students as they transition into higher education. Latinx students remain underrepresented in four-year universities. Extant research demonstrates that Latinxs are more likely to enroll in community colleges (Carales, 2020), for reasons that include lower tuition (Rendón et al., 2012; Sáenz et al., 2011), proximity to home (Núñez et al., 2011), and their family's socioeconomic status (Kurlaender, 2006). However, research also demonstrates that community colleges have low completion rates (Schudde & Grodsky, 2018) and low transfer rates to four-year institutions (Jenkins & Fink, 2015). This is due to structural barriers, including learning, psychological, and compliance costs, that are embedded in the transfer process and that present challenges for students (Bensimon & Dowd, 2009; Chase et al., 2014).

Within colleges and universities, Latinx students experience racial hostility, including racial microaggressions from faculty and peers (Yosso et al., 2009). Prior research has also shown that Latinx students' negative perceptions of campus climate hurt their sense of belonging and ultimately their outcomes (Hurtado & Carter, 1997). For Latinx students who are undocumented or have family members who are undocumented, such factors are compounded by federal, state, local, and school contexts (S. Rodriguez, 2019; M. M. Suárez-Orozco et al., 2015). Anti-immigrant policies in schools create a hostile environment that negatively affects their educational experiences (Acevedo-Gil, 2022).

Latinxs are also constrained in their ability to pay for college (Gándara & Zerquera, 2021). While Latinxs have the highest workforce participation rate, they are less likely than other groups to have the highest paying jobs (Excelencia in Education, 2019), which hampers their ability to finance college and overcome debt. Latinx students are more likely than White students to incur student loans (Student Borrower Protection Center, 2020). Their personal obligations,

such as working and caregiving, also inhibit degree completion (Crisp & Nora, 2010; Ramos et al., 2021). In their efforts to pay for college, Latinx students are also disproportionately burdened by the FAFSA income-verification process (Graves, 2022). Research suggests that efforts to promote Latinx students' success should recognize their various assets, including linguistic, social, navigational, familial, and resistant capital (Yosso, 2005). For example, an essential element for Latinx students' success in higher education is the support they receive from their family and community (Kiyama, 2010; Sáenz et al., 2020).

A Tireless Myth and Monolith: Diversity in AANHPI Student Experiences and Challenges

For AANHPI students, the model minority myth permeates educational research and policy (Poon et al., 2016). This pervasive stereotype characterizes AANHPIs as hard-working, high-achieving people who reach a high level of success (Yi & Museus, 2015). The model minority myth is further reinforced through the aggregation of data regarding this racialized group at a high level, characterizing *all* AANHPI students as exemplary in their academic success and overall achievement (Teranishi, 2010). This monolithic perspective obfuscates the vast variation in experiences and achievements across ethnic groups (e.g., Nguyen et al., 2019).

Research has also shown how U.S. schools can reify race and reproduce racial inequalities for AANHPI immigrant and second-generation students (S. J. Lee et al., 2017; Lewis & Diamond, 2015). Examples include the devaluing of students who are English learners, by forcing them to take remedial courses regardless of their abilities and requiring them to retake classes they have previously mastered, thus isolating them from the rest of the school and focusing student learning on English language rather than academic skills (Palmer & Jang, 2005). Reifications of race are also reproduced by teachers who stereotype AANHPIs with

regard to intelligence, academic striving, introversion, and rule compliance (Chang & Demyan, 2007).

Partly because of data aggregation, AANHPI students remain one of the most misrepresented groups in higher education (Maramba, 2011). By essentializing the AANHPI experience, scholarship neglects to consider the unique challenges that different AANHPI ethnic communities experience (Gutierrez et al., 2021; Museus & Truong, 2009). For example, aggregated data suggest that AANHPI educational attainment is 3.5 times higher than that of Latinx and Indigenous Peoples, 2.5 times higher than Black educational attainment, and 1.5 higher than White educational attainment (Edlagan & Vaghul, 2016). Upon data disaggregation, 13 AANHPI ethnic groups have lower educational attainment rates than the U.S. average (Edlagan & Vaghul, 2016). Southeast Asian students, for example, are more likely to hail from low-income backgrounds and less likely to have a bachelor's degree than other AANHPIs.

In the wake of the COVID-19 pandemic, AANHPI students have endured higher rates of identity-based harassment, including threats of violence (Gutierrez et al., 2021). In 2020, one in four individuals surveyed who identified as Asian (single-race) reported fearing that someone might threaten or physically attack them (Pew Research Center, 2020). Racial microaggressions, attitudinal stereotypes, and other harmful behaviors perpetuated against AANHPIs give rise to anxiety and mental health challenges for this population in general (Tessler et al., 2020) and on college campuses (Gutierrez et al., 2021).

Racial stereotyping has created a monolithic perspective of AANHPIs. Researchers are increasingly disaggregating data regarding AANHPI college students to better understand their experiences and unmask critical differences across students categorized as AANHPIs (Xiong, 2022). Researchers have also begun to illuminate the importance of cultural community

connections for students categorized as AANHPIs in their pursuit of higher education (Museus et al., 2016).

Ethnoracial Disparities and Administrative Burdens in Higher Education

The preceding overview of the experiences of Indigenous, Black, Latinx, and AANHPI students suggests numerous ways in which racially minoritized students may be disproportionately affected by administrative burdens in the design of higher education policy. Racially minoritized students continue to face unique barriers within the schooling system that hinder their educational attainment, including lower expectations from school adults (e.g., Diamond et al., 2004; Gándara & Contreras, 2009), within- and between-school segregation (Clotfelter et al., 2021), teachers' implicit racial biases (Chin et al., 2020), racial discrimination in school discipline (Barrett et al., 2021; Owens, 2022), and inequitably distributed school resources (Weathers & Sosina, 2019). Racially minoritized individuals are also more likely to have other constraints on their time (Barnes, 2021; Ray, 2019; Wingfield & Alston, 2014) and less likely to receive support for academic pursuits from school adults (Diamond et al., 2004). Thus, administrative hurdles such as discipline-related criteria, requirements that impose substantial time costs (e.g., required completion of community service hours for free-college program eligibility), and prerequisite knowledge of the complex educational structures and systems in the U.S. can be especially burdensome for racially minoritized students.

For example, owing to racial bias in schools (e.g., Owens, 2022), racially minoritized students may be subject to greater learning costs (e.g., if their teachers or counselors fail to recognize their eligibility for certain merit-based benefits). As another example, a student's undocumented or DACA status could be associated with substantially higher compliance costs (additional paperwork) and psychological costs (due to a distrust of the government; Zelaya,

2019). Racially minoritized students might also experience higher psychological costs when seeking financial aid, since they tend to have lower levels of income and wealth (Hypolite & Tichavakunda, 2019). These students can also incur psychological costs when they experience microaggressions (e.g., in their interactions with bureaucrats such as higher education staff members, when they try to access benefits).

Prior literature also suggests that burdens can be experienced differently across ethnoracial groups. Indigenous students might endure higher psychological costs from policies that ignore their history and knowledge. Black students might bear disproportionately high burdens from policies that require "good behavior" or "good discipline," given the racial discrimination that they face in school discipline due to teachers' biases and racialized school climates (Owens, 2022). They may also be at greater risk of being chosen for FAFSA verification, which imposes high compliance and potentially psychological costs (Douglas-Gabriel & Harden, 2021). Latinx students might face higher learning costs in their interactions with transfer policies because of language barriers (Bensimon & Dowd, 2009; Chase et al., 2014) and higher psychological costs from policies requiring U.S. citizenship for those who are undocumented (Diaz-Strong, 2021). AANHPI students might be especially burdened psychologically by higher education policies that make them invisible (e.g., policies that name specific ethnoracial groups and exclude AANHPIs).

Policies can reduce inequalities only if they address the unique, diverse challenges that racially minoritized students experience at the intersection of various identities. Often, equity policy provisions fail to challenge the institutional and structural barriers that students face, consequently widening the educational achievement gap (Gamoran, 2015). Attending to the historical and social structures that have served to maintain the racial order within and through

education systems shifts the responsibility for the success of racially minoritized students onto policymakers and higher education administrators and practitioners.

Proposed Framework: Racialized Administrative Burdens in Higher Education Policy

Building on the frameworks of administrative burdens and racialized burdens (Herd & Moynihan, 2019; Ray et al., 2022) and drawing on the literature on the racialized experiences of current and prospective college students, we propose a framework for examining higher education policy. Since our interest is in policy design, implementation, and effects, our framework extends beyond the meso level (organizational) covered in Ray et al.'s (2022) racialized burdens framework. Similar to Michener's (2022) racial equity framework for evaluating health policy, our framework considers how various dimensions of policy (from policy design to effects) may contribute to ethnoracial disparities in educational attainment. Higher education researchers can employ this framework to enhance the understanding of existing administrative burdens and their racialized effects and to inform racially equitable policy design and implementation.

Research on higher education policy has primarily sought to illuminate how policies are formulated and adopted (e.g., Gándara et al., 2017; Orphan et al., 2020; Rubin & Hearn, 2018). In that work, scholars have drawn heavily on theories of the policymaking process that overlook race, including multiple streams (Kingdon, 1984), advocacy coalitions (Sabatier, 1988), punctuated equilibrium (Baumgartner & Jones, 1993), and policy diffusion (Berry & Berry, 1990; Walker, 1969). Those theories seek to explain why issues are considered by policymakers and why policy change happens when it does.

Using those theories, research on the policy process has shed light on numerous factors that affect policy decisions, including decisions to embed administrative burdens in policy. First,

policy decisions depend on the characteristics of policy actors, their relationships, and their level of influence (Hearn & Ness, 2018; Kingdon, 1984; Michener, 2022; Sabatier, 1988). Highlighting a key mechanism of racial injustice, Rosino (2016) has highlighted how racially minoritized communities have historically been prevented from exerting influence in policymaking, resulting in policies that favor White interests.

In addition, policy decisions are conditioned by sociopolitical contexts, including dominant political ideologies and racial resentment (Lanford & Quadagno, 2016; Taylor et al., 2020) as well as socioeconomic, demographic, educational, and economic contexts (Hearn & Ness, 2018). Research also demonstrates how focusing events or external shocks can shape policy agendas and decisions (e.g., the killing of George Floyd and the COVID-19 pandemic; Kingdon, 1984; McCoy-Simmons et al., 2022; Sabatier, 1988). Finally, policymaking may be influenced by previous related policy decisions within a given jurisdiction (Hearn & Ness, 2018; Mettler, 2014) and related policy decisions in other jurisdictions (policy diffusion; Berry & Berry, 1990; Hearn & Ness, 2018).

Notwithstanding some exceptions (e.g., Bell & Gándara, 2021; Felix, 2021; Felix & Trinidad, 2020; Garces & Poon, 2018; McCoy-Simmons et al., 2022; Taylor et al., 2020), the higher education policy literature has paid scant attention to ethnoracial inequities in policymaking processes, policy implementation, and the differential effects of policies on minoritized communities (for a thorough review and extended argument, see A. Rodriguez et al., 2021). Consequently, a dearth of higher education policy literature addresses the mechanisms that advance ethnoracial inequities through policy design and implementation.

The framework we propose is intended to answer the following questions related to racialized administrative burdens in higher education policy design, implementation, and effects:

1. Are racialized administrative burdens embedded in higher education policy *designs*?

   a. How and why are racialized burdens embedded in higher education policy designs?

2. Are policies implemented in ways that impose greater burdens on racially minoritized students?

   a. How and why are policies *implemented* in ways that impose greater burdens on racially minoritized students?

3. What are the *effects* of administrative burdens on students pursuing higher education, including their college access and degree or certificate attainment?

   a. How do these effects differ across racialized groups?

Figure 1 illustrates our proposed framework of racialized administrative burdens in higher education policy, which links policy design (both the process of designing policy and the policy design architecture), policy implementation, and outcomes with a focus on racialized administrative burdens.

The framework posits that individual ideas and entrenched ideologies about racialized groups permeate *policy design* (e.g., policymakers' racialized perceptions of who is deserving of policy benefits; Schneider & Ingram, 1993), *policy implementation* (e.g., racialized willingness to grant waivers or share beneficial information), *students' experiences with policy* (e.g., racialized learning, compliance, and psychological costs), and, ultimately, students' *outcomes*. Features of the policy design process, including who is involved and influential in this process and the discourses surrounding the process (recognition of ethnoracial disparities and justifications for including administrative burdens in policy design), will affect the policy design language that is adopted. The policy design language will include apparent administrative

burdens (ones that could theoretically be experienced as burdens by students), will distribute burdens across different target populations, and will dictate which agents should implement the policy. These features of policy design will shape how the policy is implemented as well as students' experiences with policy.

The framework further posits that students' experiences with policy—and the degree to which these experiences vary across ethnoracial groups—will depend not only on policy design but also on how the policy is implemented (Tormes-Aponte et al., 2021). Aspects of policy implementation that will affect students' experiences with higher education policy include the organizational practices and norms of the higher education institution; features of the implementing agents (e.g., Nienhusser, 2018), including their levels of critical consciousness[6]; and the ways in which practices are decoupled from formal rules (e.g., when, how, and why exceptions are made; Ray et al., 2022). The framework recognizes differences between *apparent* administrative burdens (elements of a policy design that appear burdensome but are not experienced as such by students) versus *realized* burdens (those that students experience as onerous). The degree to which students experience policy elements as onerous depends on how the policy is implemented. The policy's implementation will constrain or enable access to resources for racially minoritized students and affect their level of agency. The degree to which students are able to access resources necessary for college success, their level of agency, and their other experiences with administrative burdens (e.g., psychological costs) will affect their educational outcomes.

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[6] We draw from Freire's (2000) notion of conscientização to refer to a subject's awareness of oppression, which can motivate praxis through agency. In the context of this study, an agent's critical consciousness entails a critical understanding of historically oppressive structures and the policies positioned within.
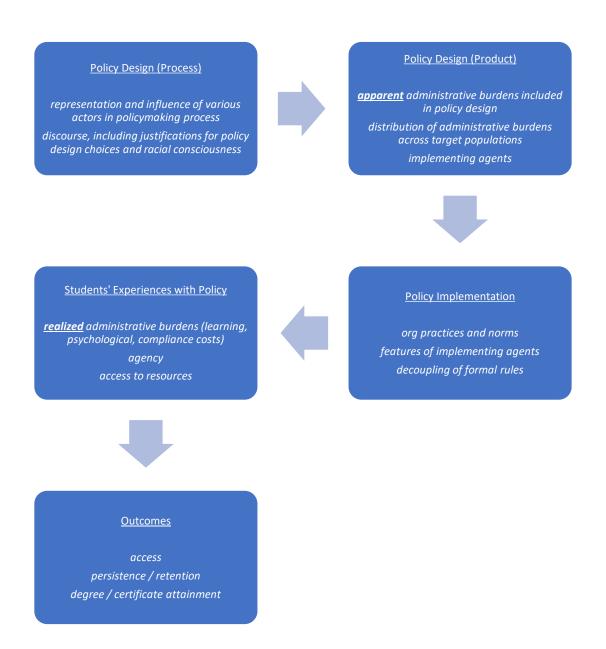
Figure 1. Framework of racialized administrative burdens in higher education policy

The proposed framework answers Gillborn's (2005) call to look beyond superficial

rhetoric of policies and interrogate who or what drives education policy, who wins and who loses

as a result of education policy priorities, and what the effects of policy are. To complement the

proposed framework, we advance 10 propositions, drawing primarily on the administrative

burdens and racialized burdens frameworks, and building on existing conceptual frameworks used to examine policy design, implementation, and effects (e.g., Bradbury, 2020; Hearn & Ness, 2018; Institute for Higher Education Policy, 2022; Kingdon, 1984; Schneider & Ingram, 1993). The propositions, presented in Table 1, fall into three major facets of policymaking: policy design, policy implementation, and policy effects. The table also presents research questions corresponding to each proposition that can be pursued by using our framework of racialized administrative burdens in higher education policy.

Table 1. Propositions and research questions for the framework of racialized administrative burdens in higher education policy

Proposition	Research Questions
Racialized Policy Design	
1. Policymakers will intentionally embed administrative burdens (compliance costs, learning costs, and psychological costs) in policy design, especially when they perceive racially minoritized groups as the primary beneficiaries.	- What burdens do students encounter in accessing higher education benefits for which they are eligible? - What burdens do *racially minoritized* students encounter? - How do policymakers perceive and frame the groups targeted by a policy? - How are racialized perceptions of targets of policy related to the inclusion of administrative burdens in policy design?
2. The degree to which policymakers impose burdens on racially minoritized groups through higher education policy will depend on the influence of racially minoritized people and collectives and those with elevated critical consciousness in policy processes.	- Under what conditions are administrative burdens disproportionately allocated to racially minoritized students?
3. Policymakers will use race-evasive justifications for including administrative burdens in policies, including as a means of curbing abuse (Bonilla-Silva, 2018).	- How do policymakers justify the inclusion of administrative burdens in policy design? - To what extent do higher education policy designs and the discourses surrounding them explicitly recognize differences in students' opportunities and experiences across ethnoracial groups?

Racialized Policy Implementation	
4. Students' experiences with policy will depend on how the policy is designed (apparent administrative burdens in policy and who is charged with implementation).	- How do students', especially racially minoritized students', experiences with policy differ depending on the level of apparent administrative burdens embedded in the policy? - How do students' experiences with administrative burdens differ depending on who is charged with implementing the policy?
5. Racially minoritized students will generally experience policies as more onerous than their White peers, with variation across ethnoracial groups.	- How do students' experiences with administrative burdens differ across ethnoracial groups?
6. Higher education institutions can reduce administrative burdens for racially minoritized students through organizational commitments to equity, manifested as symbolic commitments (which can reduce psychological costs), as well as material, technical, and relational commitments (which can reduce compliance and learning costs) (Felix, 2022).	- How are students' experiences with administrative burdens conditioned by organizational practices and norms, including their symbolic, material, technical, and relational commitments to equity?
7. The experiences racially minoritized students have with policy will depend on the characteristics of implementing agents, including how they understand and make sense of a policy and their role, their social characteristics, and their degree of critical consciousness.	- What role do implementers (e.g., higher education professionals) play in the extent to which students experience apparent burdens in policy designs as actual (realized) burdens? - How do students' experiences with administrative burdens differ based on characteristics of implementing agents?
8. Formal rules will be decoupled from organizational practice within higher education institutions in racialized ways. Stated differently, agents, like higher education practitioners, will make exceptions to the rules in ways that are racialized. As a result, practices will vary depending on the perceived ethnoraciality of the students.	- To what extent are formal rules decoupled from organizational practice when implementing higher education policy? - How does this decoupling track with perceived ethnoraciality of the students who are the target beneficiaries of a policy?

Racialized Policy Effects	
9. Administrative burdens will negatively affect students pursuing higher education, especially racially minoritized students, by (1) causing them to lose agency and (2) reducing access to resources.	- What are the effects of different types of administrative burdens on students pursuing higher education, including their college access and degree or certificate attainment? - How do these effects differ across racial/ethnic groups? - What are the mechanisms by which administrative burdens affect student outcomes?
10. Administrative burdens in higher education will justify the unequal distribution of resources.	- To what extent and in what ways are administrative burdens used to justify the unequal distribution of resources?

Conclusion

With our proposed framework of racialized administrative burdens in higher education policy, we bring the following into focus: (1) whether, how, and why higher education policies include administrative burdens that affect racially minoritized students disproportionately (racialized policy design); (2) whether, how, and why policies are carried out in ways that are especially burdensome for racially minoritized students (racialized policy implementation); and (3) the effects of administrative burdens on educational outcomes for racially minoritized students (racialized policy effects). Research into these three currents of literature can reveal how and why administrative burdens perpetuate inequities and their potential effects on different ethnoracial groups.

This proposed framework, along with its accompanying propositions and research questions, can propel scholars, policymakers, and practitioners to question the systemic nature of administrative burdens, including how policies and their outcomes may be racialized by design. A primary goal of our proposed research agenda is to enhance the collective understanding of how policy design and implementation produces and reproduces ethnoracial disparities in higher education. We must also ideate the means to change the systems that perpetuate racialized

inequities in higher education. Beyond diagnosing factors that perpetuate ethnoracial inequities, this agenda is intended to yield recommendations for racially equitable policy design. By using the framework of racialized administrative burdens in higher education policy, scholars, policymakers, and practitioners interested in racial justice can bring to light and address the intentional and unintentional consequences of administrative burdens in higher education policy design and implementation.

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