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The Rise of (E)quality Politics: The Political Development of Higher Education Policy, 1969-1999

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Public discussions of racial inclusion and equal opportunity initiatives in the U.S. are often met with claims that expanding access to an institution, space, or public good is likely to diminish its quality. Examples of this pattern include: anticipated (and real) property value declines when predominantly white neighborhoods become more racially diverse; fears that the excellence of white schools will decline when the population of Black and brown students grows; apprehensions that equitable hiring practices necessarily entail lower standards for job candidates. In this paper, we examine how a federal agency, the Fund for the Improvement of Postsecondary Education (FIPSE), charged with addressing the aftermath of the ‘access wave’ of new college students promulgated by the Higher Education Act of 1965, came to reconcile its commitments to educational equity and quality. Through a novel examination of the historical development of what we term (e)quality politics in the administration of civil rights policy in higher education, we trace how two concepts – equity and quality – became discursively linked and contested in American politics. (E)quality politics refers to the introduction of a policy paradigm that reframes equity discussions and goals around the professed need to preserve and advance institutional “quality” using measures and standards that are, importantly, defined and instantiated under the era of segregation that precedes equal access policies. In particular, we uncover the discursive patterns by which the perceived threats to “quality” posed by racial diversity can prompt administrators to compensate, protect, and maintain the prerogatives of high-status institutions or groups that benefited under previous eras of exclusion. Understood as part of a backlash to egalitarian reforms, we argue, these quality measures undermine equity goals.

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**The Rise of (E)quality Politics:
The Political Development of Higher Education Policy, 1969-1999**

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Abstract

Public discussions of racial inclusion and equal opportunity initiatives in the U.S. are often met with claims that expanding access to an institution, space, or public good is likely to diminish its quality. Examples of this pattern include: anticipated (and real) property value declines when predominantly white neighborhoods become more racially diverse; fears that the excellence of white schools will decline when the population of Black and brown students grows; apprehensions that equitable hiring practices necessarily entail lower standards for job candidates. In this paper, we examine how a federal agency, the Fund for the Improvement of Postsecondary Education (FIPSE), charged with addressing the aftermath of the ‘access wave’ of new college students promulgated by the Higher Education Act of 1965, came to reconcile its commitments to educational equity and quality. Through a novel examination of the historical development of what we term *(e)quality politics* in the administration of civil rights policy in higher education, we trace how two concepts - equity and quality – became discursively linked and contested in American politics. *(E)quality politics* refers to the introduction of a policy paradigm that reframes equity discussions and goals around the professed need to preserve and advance institutional “quality” using measures and standards that are, importantly, defined and instantiated under the era of segregation that precedes equal access policies. In particular, we uncover the discursive patterns by which the perceived threats to “quality” posed by racial diversity can prompt administrators to compensate, protect, and maintain the prerogatives of high-status institutions or groups that benefited under previous eras of exclusion. Understood as part of a backlash to egalitarian reforms, we argue, these quality measures undermine equity goals.

**The rise of (e)quality politics:
The political development of higher education policy at FIPSE, 1969-1999**

Public discussions of racial desegregation and equal opportunity initiatives can prompt concerns that expanding access to an institution, space, or public good will reduce its quality. Research suggests that this pattern operates across a number of different areas of American life: anticipated (and real) property value declines accompany the racial diversification of predominantly white neighborhoods; the excellence of schools serving white children will decline when the populations of Black and brown students grow; apprehensions that equitable hiring practices necessarily entail lower standards for job candidates.² This call-and-response pattern – one in which “equity calls” are met with concerned responses about the potential for “diminished quality” – has received scholarly attention in political science and sociology. Organized under the broad umbrella of racial threat theory, this strain of research examines how and when individuals’ perceptions of the desirability of institutions or public goods shift in response to increased racial diversification, whether due to shocks created by demographic changes, shifting mobility patterns, or equal access and equal opportunity policies.³ This work suggests intergroup conflict is rooted in deeply-held, individual-level, psychological biases against outgroups and “rational” group-based competition over scarce goods. However, very little research closely examines how these expectations of diminished quality are formed in elite political discourse, and with what consequences for the successful enforcement of civil rights policies.

This paper provides an analysis of how two concepts—equity and quality—have become discursively linked and contested in politics as civil rights egalitarians have pursued equal access and opportunity in American life. This paper offers a novel examination of the historical development of what we term *(e)quality politics* in the administration of higher education civil rights policy. We define

² Chase M. Billingham et al., “In Search of a Safe School: Racialized Perceptions of Security and the School Choice Process,” *The Sociological Quarterly* 61, no. 3 (2020): 474–99; Clarissa Rile Hayward, *How Americans Make Race: Stories, Institutions, Spaces* (Cambridge University Press, 2013); J. Eric Oliver, *The Paradoxes of Integration: Race, Neighborhood, and Civic Life in Multiethnic America* (University of Chicago Press, 2010).

³ J. Eric Oliver, *The Paradoxes of Integration*; Ryan D. Enos, “What the Demolition of Public Housing Teaches Us about the Impact of Racial Threat on Political Behavior,” *American Journal of Political Science* 60, no. 1 (2016): 123–42.

(*e*)*quality politics* as the introduction of a policy paradigm that reframes equity policy goals and objectives around the expressed need to preserve and protect the extant “quality” of institutions, spaces, or sectors of the economy targeted by civil rights policy. Importantly, these perceived threats can prompt calls for the compensation, protection, and maintenance of high “quality” institutions or groups, thus obscuring and undermining equity goals.

Through a rich analysis of government archival materials from the mid-20th Century civil rights era into the 1990s, we use a critical discourse analysis approach to trace the process by which tensions between equity and quality are developed and come to dominate and (re)shape policy conversation on the enforcement of civil rights policy. In particular, we examine how a federal agency created to shepherd in new higher education equal access policies – the Fund for the Improvement of Postsecondary Education (FIPSE) – came to discuss and reconcile competing equity and quality priorities. Founded by Congress in 1973 as a federal grantmaking agency, FIPSE was charged with financially supporting the development of innovative educational programming that more closely matched the learning and life needs of a newly diverse college student population. Over its nearly 50-year lifespan, FIPSE experienced significant developmental shifts in its mission and focus, first championing innovative, equity-focused educational programs aimed at ensuring equal opportunity in the college student experience, before eventually turning its funding attention to programs aimed at securing and protecting postsecondary institutional quality. In what follows, we uncover the discursive patterns by which racial diversification in institutions of higher education was deliberately linked to fears over the declining “quality” of postsecondary institutions, prompting administrators to compensate, protect, and maintain the prerogatives of high-status institutions or groups that benefited under previous eras of exclusion. Understood as part of a backlash to egalitarian reforms, we argue, these institutional quality priorities come to undermine equity goals.

TOWARDS A THEORY OF (E)QUALITY POLITICS

Scholars have long considered how sharp increases in racial diversity--whether via civil rights wins or sudden immigration waves--can shape the character of collective life. This literature, broadly

organized under the mantle of racial threat theory, examines how dominant groups respond to the arrival of new groups that may threaten their status, power, or access to resources. Findings vary by context, but the weight of the evidence suggests that diversity, and especially salient *changes* in a previously homogeneous community's composition, primes in-group cohesion and out-group animosity, and can prompt a protective backlash by members of the dominant group.⁴

Most research in this area examines individual-level psychological shifts in attitudes and behaviors in response to increased diversity,⁵ but there is substantial evidence that group threat operates at organizational and institutional levels as well. In the context of increasing diversity in a given setting, research finds that those experiencing group threat, for instance, may respond in the larger political system as a cohesive, interest-based group and take material steps to reinforce their threatened hegemonic status and protect valued goods through the politics of distribution, institution-building, and rulemaking. Facing trends of diversification, for instance, white majorities have been found to change the framework for representation in local government;⁶ develop new institutions to slow the arrival of an outgroup;⁷ scale back on investments in public goods to avoid sharing with other groups;⁸ change political affiliation to oppose candidates from minority groups who might threaten the majority group's control of decision making processes;⁹ and support harsher repression or sometimes violent exclusion of minoritized

⁴ Group threat theory is often contrasted with contact theory (Allport 1954). Contact theory suggests that individual exposure to diversity provides information that lowers the salience and threat of difference, especially when individuals share common status and goals (see Oliver 2010 and Enos 2018 for syntheses). The conditions for contact theory, however, are not met by the case of (e)quality politics. While studies of contact theory examine attitudinal shifts experienced by individuals who are subjected to diversity changes, processes of *(e)quality politics* are more squarely located in institutional and organizational decision making.

⁵ Oliver, *The Paradoxes of Integration*; Enos, "What the Demolition of Public Housing Teaches Us about the Impact of Racial Threat on Political Behavior."

⁶ Alberto Alesina, Reza Baqir, and Caroline Hoxby, "Political Jurisdictions in Heterogeneous Communities," *Journal of Political Economy* 112, no. 2 (2004): 348–96.

⁷ Michael Jones-Correa, *Governing American Cities: Inter-Ethnic Coalitions, Competition, and Conflict* (Russell Sage Foundation, 2001).

⁸ Alberto Alesina and Eliana La Ferrara, "Who Trusts Others?," *Journal of Public Economics* 85, no. 2 (August 1, 2002): 207–34; Daniel J. Hopkins, "The Diversity Discount: When Increasing Ethnic and Racial Diversity Prevents Tax Increases," *The Journal of Politics* 71, no. 1 (January 1, 2009): 160–77; Jessica Trounstine, *Segregation by Design: Local Politics and Inequality in American Cities* (Cambridge University Press, 2018).

⁹ Gary Rivlin, *Fire on the Prairie: Chicago's Harold Washington and the Politics of Race* (H. Holt, 1992); Eric Kaufmann, "The Rise of Cosmopolitanism in the 20th-Century West: A Comparative-Historical Perspective on the United States and European Union¹," *Global Society* 17, no. 4 (October 1, 2003): 359–83.

groups.¹⁰ These reactions are likely to be most intense during periods of adjustment when newcomers begin to arrive on the scene, or when a disturbance to the overall balance of institutional power is imminent.¹¹

Racial Exclusion and Quality

Together, these studies provide a body of theory and evidence that suggests we can expect a racially infused backlash at key moments of racial integration and egalitarian advance. One of the most common tools used to carry out this protective work in the U.S. has been racial segregation – an often fiercely enforced mechanism that can have major cumulative effects on the disparate quality of separated institutions. Segregative policies, practices, and behaviors have not only managed to stave off the threat of racially-integrated coexistence for many white Americans, but perhaps even more importantly, they have facilitated generations of targeted and unequal public and private investment across racially segregated institutions and spaces.¹² Physical separation allows policymakers, organizational leadership, or administrators to concentrate spending and resources—whether on infrastructure, public safety, or commercial investment—in the physical places inhabited by the dominant white group.

As many scholars note, such disparate investment over a prolonged period of time can *effectively cement inequitable levels of quality, desirability, and functionality across separate spaces*—incentivizing the most economically privileged to isolate themselves and their families in havens that are secure from material degradation, and further return the benefits of public investment to white Americans. In the example of housing and neighborhood life in many metropolitan centers in the U.S., for instance, formal and informal policies of residential segregation produced substantial gaps in access to wealth,

¹⁰ Valdimer O. Key Jr, *Southern Politics*, 1949.

¹¹ Hopkins, “The Diversity Discount”; Zoltan L. Hajnal, Elisabeth R. Gerber, and Hugh Louch, “Minorities and Direct Legislation: Evidence from California Ballot Proposition Elections,” *Journal of Politics* 64, no. 1 (2002): 154–77.

¹² Trounstein, *Segregation by Design*; Douglas S. Massey, *Categorically Unequal: The American Stratification System* (Russell Sage Foundation, 2007); Douglas S. Massey and Nancy A. Denton, “The Elusive Quest for the Perfect Index of Concentration: Reply to Egan, Anderton, and Weber,” *Social Forces* 76, no. 3 (1998): 1123–33; Peter Burns and James G. Gimpel, “Economic Insecurity, Prejudicial Stereotypes, and Public Opinion on Immigration Policy,” *Political Science Quarterly* 115, no. 2 (2000): 201–25.

reinvestment, and financing and material contrasts in “white” and “Black” places which in turn shaped popular assessments of the relative quality of neighborhoods, and importantly, of the persons who dwelled there.¹³ As this process reinforced itself over generations, the social acceptability and desirability of persons became conflated in the popular imagination with the places in which they were allowed to live, learn, or do business.¹⁴ Such that, over time, the race of individuals residing in, frequenting, or patronizing an institution comes to provide a shorthand for the quality of that institution. Research finds, for instance, that property values in the U.S. are often linked to the race of residents and their neighbors,¹⁵ such that white residents use the presence of Black neighbors as a proxy for assessing neighborhood quality.¹⁶ Due to this devaluation effect, studies of neighborhood composition preferences reveal that respondents (of all racial backgrounds, though at more exaggerated rates among white respondents) tend to list African Americans as their least preferred neighbors.¹⁷

Such practices contribute to what we identify as a historical conflation of race and “quality” in a number of contexts across American life. For instance, in the example of education, a history of durable, marked racial separation has meant that schools attended by predominantly nonwhite students have come to be understood as unequal and deficient, even during periods when government officials assured the public that they were merely separate. The landmark *Brown v. Board* Supreme Court decision took pains to explain that the quality of schools had been irrevocably linked to race in the U.S. The long durée of school segregation policies, enshrined by the “separate but equal” doctrine of *Plessy v. Ferguson*, resulted in not only very different educational experiences for Black and white students, but it also, the Court argued, shaped popular assessments of the educational ability of the students, “for the policy of separating

¹³ Trounstine, *Segregation by Design*.

¹⁴ Hayward, *How Americans Make Race*.

¹⁵ Hayward; Freund, “South Africa”; Rothstein, *The Color of Law*.

¹⁶ John Yinger, “Cash in Your Face: The Cost of Racial and Ethnic Discrimination in Housing,” *Journal of Urban Economics* 42, no. 3 (1997): 339–65; Richard P. Taub, D. Garth Taylor, and Jan D. Dunham, *Paths of Neighborhood Change: Race and Crime in Urban America* (University of Chicago Press Chicago, 1984); Fredrick C. Harris, *Something within: Religion in African-American Political Activism* (Oxford University Press, 1999).

¹⁷ Camille Zubrinsky Charles, “Neighborhood Racial-Composition Preferences: Evidence from a Multiethnic Metropolis,” *Social Problems* 47, no. 3 (2000): 379–407; Valerie A. Lewis, Michael O. Emerson, and Stephen L. Klineberg, “Who We’ll Live with: Neighborhood Racial Composition Preferences of Whites, Blacks and Latinos,” *Social Forces* 89, no. 4 (2011): 1385–1407.

the races is usually interpreted as denoting the inferiority of the negro group.”¹⁸ Indeed, during the school integration debates of the mid-20th Century, even education scholars who were in favor of racial integration lamented the presumably adverse effects that the presence of Black youth would have on the quality of white learning environments.¹⁹ Even today, white survey respondents’ self-reported assessments of the quality or desirability of particular schools continue to be lower for those with more racially diverse student bodies.²⁰

Assessments of quality, thus, serves an important role in shaping racial politics and acting as a rhetorical and material mechanism by which group threat is translated into durable and lasting policy results. As we know from studies of residential and school integration, quality assessments developed under eras of segregation and exclusion matter for how we think about race and quality at later moments.²¹ Even after the central ideas supporting racial segregation are debunked or reversed, policies designed to combat segregative patterns are undermined by the shared understandings of what constitutes high-quality spaces, services, and public goods—understandings that are typically developed during previous eras of exclusion. For many spaces and institutions, the maintenance of racial homogeneity has come to be seen as a necessary condition for the preservation of “desirability.” Thus, conditions of segregation, by intensifying the unequal distributions of valued goods, ultimately distort everyday judgments about the quality of neighborhoods, towns, schools, and public services. As a result, references

¹⁸ Brown v. Board of Education, 347 U.S. 483 (1954). The referenced material is from footnote 10.

¹⁹ In a 1967 report for the Department of Health, Education, and Welfare, for instance, the influential psychologist, Urie Bronfenbrenner, citing “the serious inadequacies experienced in school by disadvantaged children, especially Negro boys,” warned of the negative spillover effects their classroom integration would pose to their, “white companion, who is exposed to the contagion of disorganized and antisocial behavior.” See Urie Bronfenbrenner, “The Psychological Costs of Quality and Equality in Education,” *Child Development*, 1967, 909–925.

²⁰ Chase M. Billingham et al., “In Search of a Safe School: Racialized Perceptions of Security and the School Choice Process,” *The Sociological Quarterly* 61, no. 3 (July 2, 2020): 474–99; Kimberly Goyette, John Iceland, and Elliot Weininger, “Moving for the Kids: Examining the Influence of Children on White Residential Segregation,” *City & Community* 13, no. 2 (2014): 158–78; Jennifer Jellison Holme, “Buying Homes, Buying Schools: School Choice and the Social Construction of School Quality,” *Harvard Educational Review* 72, no. 2 (April 10, 2009): 177–206.

²¹ Freidus, Alexandra, and Eve L. Ewing. “Good Schools, Bad Schools: Race, School Quality, and Neoliberal Educational Policy.” *Educational Policy*, 2022; Freidus, Alexandra. “Segregation, Diversity, and Pathology: School Quality and Student Demographics in Gentrifying New York.” *Educational Policy*, 2022.

to quality become a shorthand for race-based stratification, and a way to discuss the costs of integration, and the fears of racial threat that it activates, in a race-neutral way.

Thus, conditions of segregation, by intensifying the cumulative, unequal distribution of valued goods, ultimately distort everyday judgments about the quality of institutions and spaces. What happens, then, when civil rights policies aimed at erasing the “color line” seek to integrate previously segregated institutions and spaces? How do long-held assessments of institutional quality shape what the administration of equal access mandates looks like? This is where our project finds its focus. While we now know much about how individuals’ perceptions of the desirability of institutions or goods form and harden in response to observations of segregated life, far less attention has been devoted to studying how *political institutions* charged with carrying out equal access and equal opportunity policies contend with and instantiate concerns about the diminishment of quality in racially diverse and nonwhite institutions.

Institutionalizing (E)quality Politics

We seek to advance this discussion by bringing attention to the ways in which the rhetorical construction and empirical operationalization of quality shape racial politics and provide a mechanism that transforms perceptions of institutional vulnerability into durable and lasting policies that undermine inclusive egalitarian efforts. This means looking beyond the fear and perceived threat experienced by individuals confronting racial diversification, to the agencies and institutions tasked with carrying out integrative policy. This is important for two reasons. First, administrative agencies are important arbiters of what quality is, or is not, in the policy domains in which they work. Administrators are often tasked with the responsibility of developing measures, standards, and definitions of what is to be considered a “high quality” and “poor quality” input or output. Second, measures of quality can be particularly sticky, difficult to change, and are seen as objective and therefore fairly static concepts, such that administrative conceptions of quality can seamlessly carry over from one era to the next even as policy and political goals change.²²

²² Freidus, “Segregation, Diversity, and Pathology.”

Theories of intercurrent institutional persistence and organizational imprinting can help us better understand how conceptions of quality developed in segregationist eras can have lasting effects even after formal segregation is delegitimized.²³ Through institutional imprinting, or the process by which elements of a cultural setting are embedded into organizations and have causal significance long after an organization's early, formative period.²⁴ In the U.S. context, where the allocation of public resources was almost universally developed under openly segregationist and white supremacist regimes,²⁵ political institutions operating in previously-segregated domains can have racialized values, rewards, and regulations baked into their status quo, even in the absence of individual acts of overt racism.²⁶ In this way, we can begin to shift the study of white supremacy away from examinations of society's wider racial politics, and towards a focus on the stratifying machinations of agencies. Desmond King and Rogers Smith, for instance, identify a recurrent pattern of transformative egalitarians doing battle with white supremacists across the long arc of U.S. political history, but we identify a similar divide within political institutions that emerges in a subtler form. The divide between challengers and defenders of the racial status quo is less explicit in the administrative context.²⁷ Racial backlash in such settings does not entail public acts of direct retrenchment, the obvious reallocation of resources, or stark pronouncements. Rather administrative disputes unfold on a different ground in which habitual, taken-for-granted, shared

²³ Elisabeth S. Clemens and James M. Cook, "Politics and Institutionalism: Explaining Durability and Change," *Annual Review of Sociology* 25, no. 1 (1999): 441–66; Victoria Johnson, "What Is Organizational Imprinting? Cultural Entrepreneurship in the Founding of the Paris Opera," *American Journal of Sociology* 113, no. 1 (2007): 97–127; Mark C. Suchman, "Managing Legitimacy: Strategic and Institutional Approaches," *Academy of Management Review* 20, no. 3 (1995): 571–610; Arthur L. Stinchcombe, "Organizations and Social Structure," *Handbook of Organizations* 44, no. 2 (1965): 142–93.

²⁴ Kavita Rao and Adam Tanners, "Curb Cuts in Cyberspace: Universal Instructional Design for Online Courses," *Journal of Postsecondary Education and Disability* 24, no. 3 (September 1, 2011): 211–29; Royston Greenwood et al., *The SAGE Handbook of Organizational Institutionalism* (SAGE, 2017); Johnson, "What Is Organizational Imprinting?"

²⁵ Melissa E. Wooten and Lucius Couloute, "The Production of Racial Inequality within and among Organizations," *Sociology Compass* 11, no. 1 (2017): e12446; Mustafa Emirbayer and Matthew Desmond, *The Racial Order* (University of Chicago Press, 2015); Joy Ann Williamson-Lott, *Jim Crow Campus: Higher Education and the Struggle for a New Southern Social Order* (Teachers College Press, 2018); Smith, "The Demise of Integration."

²⁶ Ray; Victor Ray and Danielle Purifoy, *The Colorblind Organization', Race, Organizations, and the Organizing Process* (Research in the Sociology of Organizations, Volume 60) (Emerald Publishing Limited, 2019); Emirbayer and Desmond, *The Racial Order*.

²⁷ Desmond S. King and Rogers M. Smith, "Racial Orders in American Political Development," *The American Political Science Review* 99, no. 1 (2005): 75–92.

understandings of concepts like culture, tradition, and quality serve as governing norms and shape the terrain of debate—and ultimately outcomes. In this way, what Victor Ray has identified as “racialized organizations” (re)create inequitable outcomes by routinizing and legitimizing values associated with racial hierarchies.²⁸ Racial inequality is thus institutionalized, or durable and persistent over time, via the links created between legitimate practices embodied within racialized organizations and unequal access to resources and agency in an organizational field.²⁹ Once institutionalized, phenomena like elite universities’ legacy admissions policies become taken-for-granted and are adopted by other organizations to signify their own legitimacy. In turn, such white-serving practices become markers of “quality” that can differentially advantage some racial groups over others without ever mentioning race.³⁰ The racial backlash at the center of (e)quality politics, in other words, does not occur in the public arena; rather, it is disguised as expert, disinterested debate over how to protect and maintain the quality of American institutions, spaces, and life.

SITE OF ANALYSIS: THE CASE, DATA, AND METHODOLOGY

In this paper, we examine the development of a durable *regime of (e)quality politics* in a federal grantmaking agency serving institutions of higher education: the Fund for the Improvement of Postsecondary Education (“FIPSE”). Founded on the tail end of the federal government’s mid-20th Century civil rights policy agenda, FIPSE was created in 1973 and charged with funding and supporting structural reforms in institutions of higher education to create more inclusive learning environments for the newly diverse student body entering colleges and universities.³¹ Just eight years prior, the Higher

²⁸ Cheryl I. Harris, “Whiteness as Property,” *Harvard Law Review*, 1993, 1707–91; Ray, “A Theory of Racialized Organizations”; Wooten and Couloute, “The Production of Racial Inequality within and among Organizations.”

²⁹ Clemens and Cook, “Politics and Institutionalism”; McCambly and Colyvas, *Dismantling or Disguising Racialization*.

³⁰ Ray and Purifoy, The Colorblind Organization’, Race, Organizations, and the Organizing Process (Research in the Sociology of Organizations, Volume 60); Moon-Kie Jung, Beneath the Surface of White Supremacy: Denaturalizing U.S. Racisms Past and Present, 1 edition (Stanford, California: Stanford University Press, 2015).

³¹ Anthony S. Chen and Lisa M. Stulberg, “Racial Inequality and Race-Conscious Affirmative Action in College Admissions: A Historical Perspective on Contemporary Prospects and Future Possibilities,” in Beyond Discrimination: Racial Inequality in a Post-Racist Era (Russell Sage Foundation, 2013), 105–134; Daniel P. Moynihan, “The Politics of Higher Education,” *Daedalus* 104, no. 1 (1975): 128–47; Stevens and Gebre-Medhin, “Association, Service, Market”; Thomas R. Wolanin, “Federal Policy Making in Higher Education,” *AAUP Bulletin* 61, no. 4 (1975): 309–314.

Education Act (“HEA”) of 1965 launched a number of programs aimed at increasing the representation of underrepresented groups in colleges across the country: Title IV contained a multi-billion dollar student aid program to underwrite broad educational access beyond high school, and Titles III and V, respectively, provided federal funding to help shore up Black-, and later, Hispanic-serving colleges.³² Prior to the HEA, federal involvement in higher education stayed within the bounds of openly segregationist politics and policies that were typically locally-controlled. For example, the federal government required participating states of the 1862 and 1890 Morrill Land Grant Acts³³ to offer postsecondary opportunities for Black students--albeit states were allowed to do so via the creation of separately established and systematically underfunded HBCUs. Similarly, under pressure from southern Democrats, the federal government delegated the implementation of the Servicemen's Readjustment Act of 1944 (the G.I. Bill) to local administrators who obstructed Black servicemen’s access to the postsecondary benefits that facilitated a mid-20th century social mobility among many lower and working class whites.³⁴ As such, the political moment in question (in the mid-1960s and early 1970’s) was the first time either academics or U.S. policymakers had to consider and develop policy on the treatment of students of color within predominantly white institutions of higher education.

So, while the massive federal undertaking codified by the HEA shook one structural mode of educational inequality—that of admissions and access—there was still the question of what would happen to these new populations of students as they entered college life. Civil rights advocates argued that this was the next frontier of higher education reform: addressing the need to equalize educational opportunities and learning experiences occurring *behind* the walls of postsecondary institutions for a newly diverse student body. To address this concern, FIPSE was created and given authority to develop

³² Christopher P. Loss, *Between Citizens and the State: The Politics of American Higher Education in the 20th Century*, Princeton University Press, 2014.

³³ Note also that the lands redistributed to white colleges and universities via the Morrill Land Grant Acts were violently stolen from indigenous tribes and nations via the U.S. government’s settler colonialism. Wheatle, Katherine IE. “Neither Just Nor Equitable.” *American Educational History Journal* 46, no. 2 (2019): 1–20.

³⁴ Katzenbach, Ira. *When Affirmative Action Was White: An Untold History of Racial Inequality in Twentieth Century America*. WW Norton & Company, 2005.

and distribute innovation grants to institutions of higher education with the purpose of incentivizing projects that center, rethink, and reform postsecondary learning environments to be more inclusive of minoritized students through, for example, changes to curriculum, pedagogy, student supports programs, and navigable administrative infrastructure.

But as we will demonstrate, FIPSE would become the primary site of contentious debate over the value and legitimacy of such reforms. By the 1990s, FIPSE was disproportionately providing grants and resources to fund educational initiatives for predominantly white students at predominantly white, prestigious institutions of higher education, rather than equity initiatives adopted by diverse, broad-access institutions that actually serve the majority of the nation's low-income and students of color—(the population its founding leadership targeted in the 1970s).³⁵ The effects of this transformation on the ground were widespread: even today, the colleges and universities that serve the largest populations of racially minoritized students receive the least public investment, a pattern that echoes the systematically racialized funding schemes that research also identifies in K-12 schools.³⁶ How did FIPSE come to reinforce the very inequities it was founded to address? The answer, we argue, is rooted in the political development of a regime of *(e)quality politics* in higher education.

Methods

In the following, we offer an historical analysis of FIPSE's contentious formative period (1968-1972), the era of equity-focused action that followed (1973-1981), the period of quality-focused conservative retrenchment in the 1980s that endured into the 2000s. Our data are drawn from an original archive of content drawn from congressional hearings and policy documents accessed via the ProQuest Congressional database; primary documents accessed on-site at the National Library of Education and the National Archives and Records Administration; and a collection of administrative documents and grant guidelines compiled from libraries across the country (N=658 documents totaling over 6,000 pages).

³⁵ McCamby, Heather, and Jeannette A. Colyvas. "Institutionalizing Inequality Anew: Grantmaking and Racialized Postsecondary Organizations." *Review of Higher Education*, 2022.

³⁶ Darrick Hamilton and William A. Darity, "The Political Economy of Education, Financial Literacy, and the Racial Wealth Gap," 2017.

These multiple sources of data allow us to triangulate the varied political interests and sources of institutional authority at play, and to compensate for biases.³⁷ Beyond the data used directly in the scope of this paper, this study is part of a larger project involving multiple types of data including 26 interviews conducted with past and present FIPSE staff with tenures ranging from the agency's founding through 2017 as well as extensive quantitative analysis of grant dollars delivered over time. We used these data as exploratory and confirmatory sources of evidence for the purpose of this study.

Two researchers, supported by multiple research assistants, used a critical discourse analysis approach³⁸ to analyze these data line-by-line using deductive and inductive qualitative coding techniques in NVIVO, a qualitative analysis software. Deductively, we began with codes that were informed by reviews of research on civil rights agencies and on federal higher education policy³⁹ and by our theoretical framework. These a priori codes included how policy problems were framed (e.g., racial inequality, affordability, quality), target populations (e.g., minoritized students, ivy-league universities), and policy solutions (e.g., grants to support the development of new equity initiatives at postsecondary institutions, investing in new quality standards). To enhance the reliability of the analysis, at multiple points in the analytic process, researchers coded the same data separately. Through multiple, iterative in-person calibration meetings, we discussed discrepancies in code applications and refined our respective interpretation of the codes. We then grouped manifest codes into latent second-order categories (Miles et al., 2013). This latent analysis helped uncover the deeper meaning structure of the accounts—clarifying the role of both quality and equality arguments in the scope of the agency's political development.

³⁷ Matthew B. Miles, A. Michael Huberman, and Johnny Saldana, "Qualitative Data Analysis: A Method Sourcebook," *CA, US: Sage Publications*, 2013; Robert K. Yin, *Case Study Research: Design and Methods* (Sage publications, 2013).

³⁸ Jessica Nina Lester, Chad R. Lochmiller, and Rachael Gabriel, "Locating and Applying Critical Discourse Analysis within Education Policy," *Education Policy Analysis Archives* 24, (October 17, 2016): 102; Norman Fairclough, "Critical Discourse Analysis and Critical Policy Studies," *Critical Policy Studies* 7, no. 2 (July 1, 2013): 177–97; Rebecca Rogers et al., "Critical Discourse Analysis in Education: A Review of the Literature," *Review of Educational Research* 75, no. 3 (2005): 365–416.

³⁹ See, e.g., Loss, *Between Citizens and the State*; Claire Krendl Gilbert and Donald E. Heller, "Access, Equity, and Community Colleges: The Truman Commission and Federal Higher Education Policy from 1947 to 2011," *The Journal of Higher Education* 84, no. 3 (2013): 417–43.

FINDINGS: THE DEVELOPMENT OF (E)QUALITY POLITICS IN HIGHER EDUCATION POLICY

Opening the Schoolhouse Doors...to Quality Concerns (1968-1971)

The passage of the 1965 Higher Education Act marked a critical development in the effort to broaden access to postsecondary institutions. By providing government-subsidized financial support directly to students, the Act removed a key structural barrier that kept many potential students out of the halls of higher education, most notably students of color. In light of this, civil rights advocates and higher education leaders began to consider: what happens when a house originally built for the education and socialization of successive generations of white elite students has its doors flung wide open by federal policy?

The Carnegie Foundation, which had long taken a special interest in higher education, was one of the first organizations to take up this challenge. In 1967, the Carnegie Foundation convened the Commission on the Future of Higher Education (also known as the Kerr Commission) which was composed of educational, economic, and policy experts and chaired by Clark Kerr, the one-time President of the University of California system. Working closely with education experts in the Department of Health, Education, and Welfare (“HEW”), the Carnegie Foundation charged the Kerr Commission with studying and offering concrete policy recommendations to Congress on the “future structure, functions, and financing of higher education” in the wake of the HEA reforms.⁴⁰ In particular, the Commission was asked to consider how postsecondary institutions might create more inclusive learning environments that foster success for a newly-diverse college student body.

In its 1968 report, *Quality and Equality: New Levels of Federal Responsibility for Higher Education* (hereafter referred to as the “Carnegie Report”), the Kerr Commission argued that this would be a critical but challenging task for institutions of higher education operating in this new era of more

⁴⁰ Alan Pifer, “The Nature and Origins of the Carnegie Commission on Higher Education,” 1972; Carnegie Commission on Higher Education, *Quality and Equality: New Levels of Federal Responsibility for Higher Education. A Special Report and Recommendations by the Commission, December, 1968* (McGraw-Hill Companies, 1968).

equitable access. In testimony before the Special House Committee on Education in 1969, Clark Kerr argued that higher education had been thrown into “a period of conflict and crisis brought on, in part, by the determination of increasing numbers of young Americans to obtain advanced education.”⁴¹ Key among these crises was that as groups of minoritized students gained access to postsecondary education for the first time, inequalities were likely to persist in the learning environments experienced by these students, even behind these more widely opened doors. Kerr urged that “efforts to meet their needs will be costly, difficult, and time-consuming, but they must be made.” Focusing on securing equity in admissions only, in other words, would not be enough. As Kerr explained before the Special House Committee on Education,

“As institutions move increasingly toward providing an excellent education to a diverse student population, the campus discovers how great a distance is yet to be covered. Too many campuses in the United States have started out with the assumption that the only problem was one of admissions. For many campuses, not just a new policy for admissions is involved.”⁴²

The Kerr Commission argued that the traditionally white and economically elite institutions of American higher education were not designed to meet the needs of these newcomers.⁴³ Besides issues of access and admissions, inequities lurked in the scaffolding of higher education institutions themselves and were integrated into the administrative, curricular, and pedagogical interactions that transpired between students, faculty, and administrators. As such, the Carnegie Report recommended that “all inequities that are found in curricula, policies and facilities of our colleges themselves be removed so that all ethnic

⁴¹ “Higher Education Amendments of 1969 Part 1,” Pub. L. No. HRG-1970-EDL-0011, § Special Subcommittee on Education, Committee on Education and Labor. House; Committee on Education and Labor. (1969), 592.

⁴² Hearing on Higher Education Amendments of 1969 Part 1, 601.

⁴³ Russell Edgerton, “Washington’s New Reform Fund,” *Change: The Magazine of Higher Learning* 5, no. 1 (1973): 13–14; Carnegie Commission on Higher Education, *Quality and Equality*; Clark Kerr, “The Administration of Higher Education in an Era of Change and Conflict.,” 1972.

groups may be adequately served.”⁴⁴ This, the Report urged, would require real, structural change in institutions of higher education.

In an opinion piece published in *Change* magazine – a new higher education trade journal founded in 1970 to document and track these structural reforms – Clark Kerr later lamented the fact that “no appropriate federal program or mechanism now exists to aid our institutions of higher education in their efforts to improve and reform [the content and experience of] undergraduate education.”⁴⁵ In order to “fill this crucial role of developing genuine reforms,”⁴⁶ therefore, the Commission urged the creation of a system for distributing federal financial incentives to institutions of higher education to support structural reforms and make college living and learning environments more equitable and inclusive.

To do so, the Carnegie Report called for the establishment of a new federal office, the National Foundation for the Development of Higher Education (the “FHE”), to spearhead this effort. The Report emphasized the two goals outlined right in the Report’s title, Quality and Equality, to guide the FHE’s work.⁴⁷ The FHE would provide institutions of higher education with public guidance and financial resources to institute a demanding set of reforms aimed at building quality programs focused on achieving more equitable educational outcomes for a newly diverse population of college students. Rather than reinforce the status quo, the FHE would engage in the groundbreaking work of supporting transformative curricular, pedagogical, programmatic, and administrative reforms in some of the nation’s oldest private institutions. It would serve as the primary vehicle for the federal government to “encourage, advise, review and provide financial support for institutional programs designed to give new directions in curricula, to strengthen essential areas that have fallen behind or never been adequately developed

⁴⁴ Carnegie Commission on Higher Education, *Quality and Equality*.

⁴⁵ Clark Kerr, “Clark Kerr on Foundation,” *Change*, 1972, 8.

⁴⁶ Clark Kerr, “Clark Kerr on Foundation,” 8.

⁴⁷ This idea of balancing egalitarian and quality purposes – especially quality purposes steeped in elitist notions of excellence established in the long durée of segregated postsecondary education – was a ripe topic for debate among key actors in policy and postsecondary institutions. See, e.g., Roald F. Campbell and William L. Boyd, “Federal Support of Higher Education: Elitism versus Egalitarianism,” *Theory Into Practice* 9, no. 4 (October 1, 1970): 232–38; K. Patricia Cross, “Changing Perspectives on Quality Education: The New Learners,” *Change: The Magazine of Higher Learning* 5, no. 1 (1973): 31–34.

because of inadequate funding, and to develop programs for improvement of educational processes and techniques.”⁴⁸ And the FHE would need to do so, the Kerr Commission advised, with “the mentality of taking risks rather than being a regular bureau that wants to do things which are safe and not so likely to get itself into trouble.”⁴⁹

The idea for this proposed Foundation troublemaker, however, quickly caught the attention of Nixon Administration officials who were more hostile to than encouraged by the equitable access measures put in place by the HEA. Daniel Patrick Moynihan, the future four-term Senator who spent his early career as an academic and public intellectual before serving as an advisor in the Nixon Administration, took interest in the Carnegie Report and brought it to the President’s attention.⁵⁰ As Moynihan argued, the Carnegie Report offered a model for a more interventionist federal role in higher education than the historically hands-off approach that preceded it and, ultimately, provided a much-needed solution for administration officials who were eager to address what they saw as two troubling trends stemming from the recent expansions of access to higher education: a deterioration in the quality of postsecondary institutions and campus unrest.

Nixon administration officials argued that, in the wake of what they derided as the HEA’s “massification” efforts, the quality of institutions of higher education in the U.S. were undergoing a critical decline. Chester Finn, a Staff Assistant to President Nixon (and a future Assistant Secretary of Education under Reagan), later recalled the Administration reasoning that as access to universities was expanding to a wider set of students, “the pyramid of quality in colleges and universities was flattening, and that it was doing so not only by lifting the standards of the 1,500 institutions at the bottom, but also by lowering those of the few dozen at the top.”⁵¹ The expansion of access to college, in other words, was coming at a direct cost to the quality of America’s most excellent institutions. Given this, Finn warned

⁴⁸ Carnegie Commission on Higher Education, *Quality and Equality*.

⁴⁹ Hearing on Higher Education Amendments of 1969 Part 1.

⁵⁰ Virginia B. Smith, “FIPSE’s Early Years: Seeking Innovation and Change in Higher Education,” *Change: The Magazine of Higher Learning* 34, no. 5 (September 1, 2002): 10–16. This narrative was also confirmed in retrospective interviews conducted by the authors with multiple former FIPSE staff in 2017.

⁵¹ Finn, *Chester E. Scholars, Dollars, and Bureaucrats*. Washington, D.C.: Brookings Institution, 1978, p. 24.

that “the American people [must be] prepared to allow either a deterioration in the quality, or stricter limits on the availability of higher education” should the influx of “disadvantaged” students continue.⁵²

While there was a “dearth of hard evidence of [actual] qualitative decay” in the standards of American higher education, this anxiety dominated the Nixon Administration’s activities on higher education.⁵³ Expanding college access to this new set of “disadvantaged” students was leaving the American higher education system in decline and disarray, the consequences of which, the Administration argued, were most clearly evidenced by the tide of student unrest and disruption that was rolling through college campuses starting in the mid-1960s. Campus demonstrations posed a major threat to the Nixon Administration’s promise to protect the order and stability promised to the nation’s “silent majority” of conservative, white voters who were eager to preserve the status quo in the face of so much national unrest.

The student outrage was largely focused on issues of racial injustice, U.S. involvement in the Vietnam War, and campus governance, and for many government officials the protests were seen as a direct consequence of the expanded college access policies that ushered in a new population of minoritized students who were justifiably dissatisfied with campus life. The report issued by the President’s Commission on Campus Unrest - which was famously and controversially composed of both Administration loyalists and critics – directed attention to what it called “the presence of the ‘Black issue’ in campus unrest and protest.”⁵⁴ Citing a 1969 study of student protests by the Urban Research Corporation, the Report noted that “‘Black recognition’ was the principal cause of campus protests” and was found to be “an issue on 59 per cent of the campuses and in 49 per cent of the incidents” studied.

⁵² Finn, *Scholars, Dollars, and Bureaucrats*, p. 42.

⁵³ Finn, *Scholars, Dollars, and Bureaucrats*, p. 24. Even those within the Nixon Administration, like Chester Finn, admitted that the anxiety around the quality decline was based more on anecdote and assumption than hard evidence.

⁵⁴ National Institute of Education Sciences. *The Report of the President’s Commission on Campus Unrest*. 1970, p. 109. The Report by the Presidential Commission on Campus Unrest was not a product of the Nixon Administration itself. For example, its most junior member – a current student and Black activist, Joseph Rhodes, Jr. – was censored by Vice President Spiro Agnew shortly after joining the commission for his openly pro-activist and anti-establishment statements. Instead, the *Unrest* report is a window into the contemporary understanding of campus activism at the apex of the Nixon Administration as both those siding with and against campus activists interpreted and spoke about the movement as inherently racialized and tied to Black liberation.

This “recognition” issue, the Report was careful to note, extended beyond demands for more equitable higher education admissions policies. Rather, as Black students entered historically white-serving institutions in the absence of the structural reforms the Carnegie Report recommended several years earlier, these students reported feeling excluded from and erased by campus curricula and culture.

“Whereas earlier civil rights activism had generally attacked off-campus targets, the protests of black militants now were usually directed against the university itself. The university, they claimed, had helped to perpetuate black oppression through its admissions policies, its "white-oriented" curriculum, and its overwhelmingly white teaching staff. Black students found their cultural heritage slighted or ignored altogether. Their critique of the university intensified in the late 1960's, as predominantly white institutions began to admit black students in larger numbers.”⁵⁵

Among both sympathizers and detractors alike, the student activism movement was often interpreted and spoken about as inherently racialized and tied to Black liberation.

The *Report on Campus Unrest* was received with outrage and concern by Nixon Administration officials. Within the administration, campus activism was seen as an artifact of unrest, instability, and nonwhiteness – conditions that demanded urgent federal intervention. In the face of a growing number of incidents of campus violence, riots, and protests taking place across the nation, President Nixon addressed a message to Congress imploring it to act. In his 1970 Message to Congress on Higher Education, Nixon made an appeal for greater federal intervention in quashing campus protests, wistfully referencing that “universities and colleges are places of excellence in which men are judged by achievement and merit in defined areas [and]... that violence or the threat of violence may never be permitted to influence the actions or judgments of the university community.”⁵⁶ Nixon lamented that “the Federal involvement in higher education has grown in a random and haphazard manner, failing to produce an agency that can support innovation and reform.” But no more. Declaring that the “need for reform in higher education is

⁵⁵ *Report on Campus Unrest*, p. 33.

⁵⁶ Nixon, Special Message to the Congress on Higher Education.

so urgent, that I am asking the Congress for a thoroughgoing overhaul of Federal programs in higher education,” President Nixon promised to step in and take this “rare opportunity” to “systematize and rationalize the Federal government’s role in higher education for the first time” and to fulfill the promise made to the so-called silent majority who looked to institutions of higher education as an opportunity for excellence, not for social change.

To do so, the Nixon Administration turned to the original foundation model proposed in the Carnegie Report. Moynihan brought the Report to the President’s attention and presented its foundation proposal as a potential answer to the student-based degeneration that posed a threat to the excellence of American higher education.⁵⁷ Capitalizing off of the vision proposed in the Carnegie Report for a more expansive and interventionist federal role in shaping campus life, the Administration sent a proposed bill, the Higher Education Opportunity Act of 1970, to Congress.⁵⁸ The centerpiece of the Administration bill was the creation of a new National Foundation on Higher Education (hereafter “National Foundation”) that, following the Carnegie Report’s FHE model, would act as a grantmaking institution tasked with overseeing the public finance of programs, experimentation, and innovation at institutions of higher education. But while the Administration bill replicated the structural design of the FHE outlined in the Carnegie Report, the similarities ended there. The proposed National Foundation would serve a different set of ends. Where the Kerr Commission proposed the creation of an FHE that would spearhead reforms and innovations aimed at helping institutions of higher education develop programs to inclusively accommodate a new and more diverse student body, the Nixon Administration made it clear that this was *not* to be the purpose of the Administration’s proposed National Foundation. Rather, the National Foundation would act as a grantmaking watchdog, vigilantly using its funds to maintain the quality and excellence of top tier institutions of higher education being threatened by the “massification” of their

⁵⁷ “Higher Education Act, Message from the President of the United States,” House Document No. 91-407, § House Committee on Education and Labor (1970).

⁵⁸ After Congress failed to take action on the Higher Education Opportunity Act of 1970, the Administration’s reform bill was repackaged in the Higher Education Amendments of 1971.

student bodies.⁵⁹ The National Foundation, through its grantmaking authority, was built to provide a salve for the disruptions and presumed quality backsliding caused by the entry of minoritized into postsecondary institutions.⁶⁰

By refashioning the Carnegie Report's equity-driven FHE model into one focused on shoring up the "quality" of America's institutions of postsecondary education, the Nixon Administration constructed a trade-off in the discourse on higher education reform: one that positioned burgeoning equality and access as a *threat* to the excellence and quality of elite postsecondary institutions. This constructed trade-off was not a novel innovation in higher education settings; rather, this fear of minoritized students lowering the standards of higher education was at the root of the legacy of racial segregation that pervaded the system.⁶¹ Now the Nixon Administration drew on that legacy to make a case for the need to buttress the high status and quality of elite postsecondary institutions. Referencing the Nixon Administration's decision to co-opt the Carnegie Report's foundation proposal, Daniel Patrick Moynihan reasoned that if more "egalitarian goals" were seeing progress through the introduction of policy interventions like affirmative action and student aid programs, it was also necessary to ask, "What of the

⁵⁹ Chester Finn, a staff assistant to the President, elaborated on what might be the best course of action for some of the colleges, especially historically Black-serving colleges, that were pulling down the national mean: "Obviously the Working Group [developing the Administration's Foundation proposal] could not ignore the situation, but it had to move with care, or a program that supported all Black colleges and only Black colleges might violate the Constitution and also sustain some schools that should be allowed to die, while not providing enough help to those that should be strengthened" (Finn, Scholars, Dollars, and Bureaucrats, p. 24).

⁶⁰ Higher Education Amendments of 1970 Part 1, 509.

⁶¹ For example, in unrelated testimony before Congress in 1969, in the same session as one of Clark Kerr's many testimonies regarding the Kerr Commission's work, Dr. Paul Smith of Columbia University testified on the subject of HBCUs. Referencing the legacy of white supremacy in institutions of higher education, he argued that "most institutions of higher education demonstrate minor concern for Blacks when their daily work-model is viewed. Almost all administrators, researchers and students at all levels are people with white skins. This body of majority members did not occur by chance. Tests and other exclusion devices, alleged and unalleged, are used to keep most minority people from entering these sacred circles. A frequent rationalization given is fear of Blacks contaminating so-called standards... Surely such a practice denies a sincere interest in the development of Afro-Americans. This attitude explains, in part, why the people trained to function in the public school system have failed to "turn on" minority group youth. The mother institutions have taught them well. Consequently, their products have been unable to raise achievement levels, and unable to lower dropout and suspension rates with minority group children." Higher Education Amendments of 1969, Pub. L. No. HRG-1970-EDL-0011, § Special Subcommittee on Education, Committee on Education and Labor. House; Committee on Education and Labor. House (1970). Dr Paul Smith testifying, p. 543.

complementary balancing initiative?”—specifically, the need to shore up and support the “selectarian” function of institutions of higher education?

“It is the essence of education to be selective with respect to degrees of ability, of effort, of achievement, of difficulty, of importance. It is a classifying activity. If it were to become a mass function by fiat of the federal government, the government...also had some responsibility to attend to the need to maintain select standards in at least some parts of the system.”⁶²

This, Moynihan nostalgically surmised, was a “worthy ‘Republican’ goal” that “resonated...with...the distinctive achievement of (largely) Republican wealth in creating in the late nineteenth and early twentieth centuries the great private universities of the land, the still predominant institutions of our academic culture.” These highly selective, high-quality institutions – which themselves were products of a bygone era of state-sanctioned racial segregation – now needed federal protection. If the federal government saw it fit to assume a more interventionist role in promoting and supporting equitable access to higher education through programs like federal student aid, Moynihan reasoned, then the Administration had a responsibility to protect the endangered culture and legacy of the traditionally “great institutions” through the conferral of federal *institutional aid*.⁶³

This, in other words, was the purpose of the proposed National Foundation: “to channel ‘free’ money to institutions of special merit” which, “in quite disproportionate measure[,] meant older, private institutions.”⁶⁴ Chester Finn, who worked with Moynihan on drafting the language of the Administration bills, later recalled that the Administration was “convinced that the best thing Washington could do for American higher education would be to set aside money [for the “great” institutions] with no strings attached.”⁶⁵ Shedding the Carnegie Report’s vision of a federal grantmaking agency that would aid

⁶² Moynihan, “The Politics of Higher Education,” 136.

⁶³ Moynihan, 138.

⁶⁴ Moynihan, 138.

⁶⁵ Chester E. Finn, “The National Foundation for Higher Education: Death of an Idea,” *Change: The Magazine of Higher Learning* 4, no. 2 (March 1, 1972): 25.

institutions of higher education in developing internal, structural reforms to accommodate their newly diverse student body, the National Foundation model took a decidedly hands-off approach, determined in the conviction “that neither Congresspeople nor FBI agents nor OE bureaucrats should meddle in the internal affairs of colleges.” The grantmaking activity of the National Foundation would not be aimed at incentivizing change, quite the opposite. Rather, this new Foundation would be tasked with compensating and shoring up legacy institutions against a zero-sum trade-off between quality and equality: one that presumed that a diverse student body would threaten the exceptional quality of elite institutions of higher education in the U.S. and that these institutions would need federal funding, with no strings attached, to protect this rarified status.

Soon, this tit-for-tat framing – one that pitted equity initiatives against institutional quality – made its way into larger discussions of federal higher education reform. College administrators, like the President of Beloit College, testified in congressional committee hearings that his support for the Administration’s proposed Foundation rested with the conviction that “while our commitment to broadscale educational opportunity is laudable...we have not given adequate attention in the past to educational quality.”⁶⁶ Moynihan’s three-word blueprint for the proposed National Foundation, “excellence, autonomy, reform,” was repeated in different corners by a quality-focused coalition that formed in opposition to the egalitarian access reforms spreading through the higher education system.⁶⁷ The demands at the center of this backlash were unambiguous: that government policies promoting diversification in institutions of higher education should be proportionately matched with federal financial support to give “academic communities” more “choice...to pursue excellence” – as opposed to only inclusivity – in their curricula, operations, and programs.

The Nixon administration, backed by Republicans in Congress, affirmed that the “most serious threat posed by the present fiscal plight of higher education was the possible loss of that excellence”⁶⁸

⁶⁶ “Special Subcommittee on Education,” Pub. L. No. HRG-1969-EDL-0061, § House Committee on Education and Labor (n.d.), 927.

⁶⁷ Finn, “The National Foundation for Higher Education,” 28.

⁶⁸ Message from the President of the United States on Higher Education Opportunities.

among American colleges with “special difficulties.”⁶⁹ Ultimately, rather than create a reform-minded government agency in the image of the Kerr Commission’s *Quality and Equality* blueprint, the Nixon Administration’s National Foundation would act as a bulwark against perceived threats introduced by expanded racial representation. The proposed Administration bill came to be seen by many as a program of ivy league welfare — even Nixon administration officials offered, as an analogue to their proposal, that “a guaranteed income for the poor was money with as few strings as possible” just as “revenue sharing was money for cities with as few strings as possible.”⁷⁰ Democrats in Congress balked at the Administration’s National Foundation proposal and allowed the bill to die at the end of the session.

Water from a Poisoned Well: An Equity Agency under an (E)quality Paradigm (1971 – 1981)

As the Nixon Administration worked to adapt the Carnegie Report model of federal intervention in campus life to serve quality-preservation ends, civil rights advocates worked behind the scenes to debunk the narrative being promoted by Administration officials. As the Nixon Administration’s first bill was being developed, members of an already-commissioned task force on the future of higher education strategically structured their report to offer an alternative vision for higher education policy, broadly and for a federal grantmaking foundation, specifically. The task force, coordinated and funded by the left-leaning Ford Foundation and chaired by Frank Newman, a Stanford University administrator and a fellow at the Carnegie Foundation for the Advancement of Teaching, released a widely disseminated report in 1971 that generated considerable discussion. The Newman Report, as it came to be known, focused on shifting the discussion on the state of higher education.

The authors of the Newman Report used their platform to myth-bust the distinctly racialized claims that undergirded the Nixon Administration’s Foundation proposal. The Newman Report attacked the Nixon Administration’s two core claims that, first, the “massification” caused by admissions and financial aid policies was contributing to a decline in the quality of institutions of higher education

⁶⁹ Higher Education Amendments of 1970 Part 3.

⁷⁰ Moynihan, 1975, p.138.

(especially high-status institutions) and, second, that the escalation in instances of campus unrest was grounded in Black student radicalism. The Report specifically called out the Administration's characterization of Black and other minoritized students on campus as providing a symbolic antithesis to Nixon's white "silent majority." Rather than point to Black and brown disruption as a threat to white excellence on college campuses, the Report reiterated that evidence suggested "that [B]lack [and brown] students, by and large, are concerned with acquiring an education; while the typical disrupter is white and middle-class."⁷¹ Indeed, the Newman Report lamented the fact that Black students – as the face of the civil rights movement – took the most heat from White House critics and disputed what had become a popular misperception of Black students.

"It is primarily black students whom critics of minority programs have had in mind in implying that such programs have lowered the academic standards of institutions and seriously diminished the value of degrees; that soaring minority enrollments have denied places to more highly qualified students; and that admission of large numbers of ill-prepared (and consequently frustrated) minority students has contributed heavily to campus unrest. In each case, available facts simply do not substantiate these implications."⁷²

Point-by-point, the authors of the Newman Report likewise named and refuted Nixon Administration arguments that opening the doors to racial minorities had systematically lowered the quality of U.S. higher education. First, the Report refuted the specious basis of the Nixon Administration's attempts to ring the 'quality-alarm' about the hordes of Black and brown students flooding onto the nation's once elite colleges. Citing a confidential, internal memo from Moynihan to Nixon that had been leaked to the press, the Newman Report noted that changes in Black enrollment in colleges had, in fact, been vastly overplayed using incomplete and misleading statistics on college

⁷¹ Frank Newman and William Cannon, Report on Higher Education (US Government Printing Office, 1971), 45.
⁷² Newman and Cannon, 45.

enrollments.⁷³ Drawing from more comprehensive enrollment data, the Report demonstrated that well over half of the still-lagging Black student enrollment was centered in the cash-strapped HBCU sector, not the purported “elite” white-serving institutions on which Nixon’s proposed National Foundation would focus its grantmaking attention.

The Newman Report rebuked the claims of dramatically increased Black student enrollment that the Nixon administration used to stoke fears over the declining quality of higher education. While doing so, the authors of the Newman Report also contorted and appropriated these now popular concerns over the quality of higher education to serve its own purposes. Taking a page from the Carnegie Report’s call for structural reform, the Newman Report suggested that institutions of higher education should be transformed to meet the heterogeneous needs of its now more diverse student bodies. Making this argument required a paradigm shift: one that did not reject the importance of elevating and upholding quality in higher education but, rather, one that embraced quality concerns rooted in the need to improve the college-going experience of minoritized students. The Newman Report proposed that rather than celebrating exclusivity, selectivity, and student failure as markers of institutional quality, institutions of higher education could be transformed to meet the needs of minoritized students and satisfy a very different standard of “excellence” and quality. Rather than there being a “single order of excellence in higher education,” the Report suggested that there are “a variety of institutions each excellent in its own appointed mission.”⁷⁴

Reiterating the Carnegie Report concern that the educational needs of an increasingly diverse college student population were not being met by the current programs and curricula of institutions of

⁷³ In a confidential memorandum that reached the press, Daniel Patrick Moynihan advised President Nixon that while "Negro college enrollment rose 85 percent between 1964 and 1968" – a potentially astonishing figure that "implies substantial progress in educating minorities" – in fact, "when the growth in black enrollment is compared to growth in total enrollment, the gains appear much less substantial. It is possible that these figures overstate black participation....[W]hile blacks have lately shared in the growth of enrollments, they have not gained in proportion to their numbers. Whereas black students constitute 12 percent of the college-age population, they still constitute only 6.6 percent of college students. Whereas black student enrollment rose by about 250,000 in the past 5 years, nonblack student enrollment rose by 2,500,000; that is, blacks accounted for only 9 percent of the enrollment growth." Newman and Cannon, 46.

⁷⁴ Newman and Cannon, 85.

higher education, the Newman Report cautioned that “access alone does not automatically lead to a successful education...[as it] measur[es] only the exposure of a particular age group to whatever educational institutions there are, and not the equality of the experience they are likely to find there.”⁷⁵

The Newman Report reiterated that “the needs of society and the diversity of students now entering college require a fresh look at what ‘going to college’ means.”⁷⁶ The report emphasized that the “no strings attached” approach offered by the Nixon Administration’s National Foundation proposal would effectively undermine any incentive for postsecondary institutions to engage in transformative reforms.

As the report explained, the “system, with its massive inertia, resists fundamental change, rarely eliminates outmoded programs, ignores the differing needs of students, seldom questions its educational goals, and almost never creates new and different types of institutions,” ultimately leaving “unaffected the institutionalized past decisions as to what higher education is all about.”⁷⁷

In late 1970, on the heels of the failure of the Administration’s quality-focused bill, the new Secretary of HEW, Elliot Richardson, read an early draft of the Newman Report and began to reconsider the Administration’s proposals for the Foundation. Compelled by the Newman Report’s findings on “the need for a more open, flexible and diverse system of postsecondary education,” Richardson began asking why the proposed Foundation might not conduct this important work.⁷⁸ Leveraging the findings of the Newman Report, Richardson resurrected the original Foundation proposal from the Carnegie Report, specifically addressing the Administration proposal’s failure to attend to issues of equity. In his 1971 address to the House Subcommittee on Education, Richardson reframed the discussion of the Foundation in terms of the need to “substantially enhance the capacity of higher education to serve the needs of **all** our citizens”— something that higher education had still largely failed to do (emphasis from the original). Following the expansion of educational access, Richardson argued that higher education had “kept doing what it knew best, namely, what it had been doing all along, simply expanded to a larger universe.” But

⁷⁵ Newman and Cannon, 85.

⁷⁶ Newman and Cannon, vii.

⁷⁷ Newman and Cannon, x.

⁷⁸ Edgerton, “Washington’s New Reform Fund”; Smith, “Fipse’s Early Years.”

now, Richardson warned, “the problems created during these two decades [of diversification] are all around us... modes of teaching... requirements and practices which were designed for the selective few persist; yet, today, less than half of the students who enter college ever graduate.”⁷⁹ Richardson implored Congress to create an agency that could make sure the massive federal investment in student aid and equal access would not be undermined. This would require, however, transforming, not protecting, existing systems in higher education.

Linking the equity-crisis highlighted in the Newman Report with the quality-centered solution offered by the Administration’s Foundation proposal, Democrats in Congress, with Richardson’s help, mobilized behind the creation of an alternative National Foundation for Higher Education. With this, the original equity-centered FHE proposal from the Carnegie Report was, according to contemporary observers, given “a new lease on life.”⁸⁰ As Russell Edgerton, a member of Newman’s Commission (and later named the first Deputy Director of the new Foundation), later recalled, some of the same “key senators and representatives and a number of dedicated educators” who had let the Administration’s model of “selective support for the purpose of arresting loss of excellence” in higher education “die... of benign neglect” now “began working hard for the [new] proposal.”⁸¹

Bypassing several versions of the Administration bill, in 1972 Congress passed the Higher Education Amendments Act, an omnibus bill that set aside funding for the creation of a grantmaking institution to be placed under HEW. The (re-branded) Fund for the Improvement of Post-Secondary Education (“FIPSE”) was charged with supporting and promoting equity-focused structural reforms in institutions of higher education.⁸² It was charged with funding the development of and experimentation

⁷⁹ Higher Education Amendments of 1970 Part 3, 3.

⁸⁰ Samuel Halperin, “Washington: Agenda for Commissioner Marland,” *Change: The Magazine of Higher Learning* 3, no. 1 (1971): 69. According to Halperin, the appointment of a new Secretary of HEW (Elliot Richardson) and a new Commissioner of Education were key to this renewed interest in the Foundation idea.

⁸¹ Edgerton, p. 14.

⁸² While the Nixon administration’s National Foundation proposal was accompanied by a \$100-200 million fund to be directed toward elite schools, the FIPSE aid fund was authorized at (a comparatively small) \$10 million budget in its first year. This considerable difference in funding amounts did not go unnoticed. Interviews with early FIPSE administrators indicate that FIPSE wore this modest funding budget as a badge of honor, making the most of the funds by making many, small grants as a sort of venture capital fund. They further reasoned that given the goal of institutional change, these small grants promoted legitimacy without making institutions dependent on federal grant

with more inclusive educational methods and curriculum that “were designed to fit the needs of the people to be served.”⁸³ Contemporary observers described the Fund as taking up the cause of the “educational ideas that had been given life by the civil rights movement.”⁸⁴ Arguments based in the need to preserve the “quality” of elite institutions as a mechanism to protect against the deteriorative consequences of admitting a more diverse college student body no longer held the day. Rather, as described by FIPSE’s first Deputy Director, Russell Edgerton, FIPSE’s version of institutional improvement and reform was unique among federal programs. Edgerton reasoned that while FIPSE was designed to “[go] beyond efforts to change student attitudes and behavior so they can “fit” the system – the goal of [key HEA programs like] Upward Bound, Talent Search and Special Services for the Disadvantaged – [and instead direct agency energy to] accommodat[ing] the system to the students.”⁸⁵ This call to action – to change the institution, rather than the student – was the antithesis to the preservationist goals of Moynihan’s National Foundation vision.

In congressional hearings spanning FIPSE’s early years, the agency’s first director, Virginia B. Smith, and her colleagues reminded congressional committee members of the importance of FIPSE’s charge of reinforcing the equity work that Congress started with its student aid bills. Smith implored Congress to recognize the need and “interest in higher education at the moment in bringing about that kind of improvement that will help [the institutions] better serve the students they are getting now.”⁸⁶ Early administrators confirmed that FIPSE’s mission was rooted in the equity-oriented calls to action outlined in the Newman Report. Echoing the Report’s finding that “the needs of an increasingly diverse student population were not being met by higher education,” FIPSE’s first administrators characterized it

funds to make permanent change. In response to the innovative work quickly produced by FIPSE, the agency developed a positive reputation in Washington and in the field of higher education more broadly. This recognition was reflected in the field of grantees, for which there were 2,000-3,000 applications per year for 50-100 grant slots; interview subjects reported that receiving a FIPSE grant was widely understood to be a coveted endorsement of a program.

⁸³ Edgerton, “Washington’s New Reform Fund,” 14.

⁸⁴ Sven Groenning, “A Decade of Improvement (1973-1983)” (U.S. Dept. of Education, 1983), 3.

⁸⁵ Edgerton, “Washington’s New Reform Fund,” 14.

⁸⁶ “Office of the Assistant Secretary of Education,” Pub. L. No. HRG-1974-HAP-0031, § House Committee on Appropriations, Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations (1974), 908/909.

as an encompassing problem for the nation as a whole.⁸⁷ Emphasizing that “there is not a great deal of point in having access to higher education with [student aid] funds going to students in order to get into institutions, if we can't at the same time be certain that the educational opportunity provided for them at the time they get in is one that will meet their educational needs,” Director Smith argued that the important work being done at FIPSE would allow it to act as a guarantor of the larger investments that the federal government was making in educational “access” through federal student loan programs.⁸⁸

Rejecting a snapshot approach to this work, FIPSE’s leadership frequently emphasized the historical and institutional nature of higher education’s inequality problem, one that was steeped in long traditions of service to an overwhelmingly white and socioeconomically privileged population. Without radical disruption, FIPSE leadership warned Congress, institutions of higher education were likely to continue to cater to the needs and educational demands of this more traditional population of students, even as other groups gained increased access.⁸⁹ Cautioning that faculty and administrators rarely “appreciate... the hostile and threatening environment the campus can be for a minority student,” nor the many practical roadblocks to achieving “fundamental change” that exist in a system governed by “powerful and subtle forces,”⁹⁰ FIPSE echoed the Newman Report’s urgent demand that the federal government incentivize institutions of higher education to reflect “the real needs of society rather than its own internal interests.... before present opportunities for serious reform are lost.”⁹¹

There were early signs, however, that FIPSE’s transformative stance was stirring up feelings of racial threat among civil rights opponents. For example, Virginia Smith’s repeated testimonies before Congress in support of the use of federal “grants to help [institutions] better develop programs and approaches that meet the needs of the students that they now have” were frequently met with doubts. In one instance before the Subcommittee on Departments of Labor and HEW Appropriations, when Smith

⁸⁷ Smith, “Fipse’s Early Years,” 11; Newman and Cannon, *Report on Higher Education*.

⁸⁸ Office of the Assistant Secretary of Education, 7.

⁸⁹ Office of the Assistant Secretary of Education.

⁹⁰ Newman and Cannon, *Report on Higher Education*, 49.

⁹¹ Newman and Cannon, 49.

testified that many nontraditional, minoritized students would not succeed under the status quo learning and living environments offered by colleges, Representative Daniel Flood (D-PA), the Subcommittee Chairman, quickly asked “Why not?” Sowing doubts about the qualifications of these nontraditional students, Flood continued, “How did they [the students] get there? They were a bright girl or boy?”⁹² Later in the testimony, Flood continued to push Smith on what the content of a more inclusive college curriculum might look like. When Flood suggested a more traditional curriculum steeped in the Western canon – “Four years of Latin, four years of Greek, and four years of mathematics” – Smith argued that such a perspective was a part of “the old school” way of thinking about what a quality college education should look like. Vindicated in his fears, Flood retorted, “I was afraid of that, yes.”⁹³

Flood’s fears were not unfounded; FIPSE embarked on an ambitious set of priorities focused on encouraging system change in postsecondary institutions that would allow them to better serve formerly excluded, nontraditional learners. Rather than teach “today’s students” to assimilate to these structures, FIPSE sought to change the way higher education served these students.⁹⁴ Directly referencing the Nixon Administration’s previous National Foundation proposal, Edgerton argued that “the real issue for...the fund is not the loss of excellence in American higher education but *the need to develop multiple standards*

⁹² “Hearings before the Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations,” Pub. L. No. HRG-1974-HAP-0031, § House Committee on Appropriations, Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations (1974), 909.

⁹³ Hearings before the Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations, 910.

⁹⁴ Edgerton, “Washington’s New Reform Fund”; “Program Information and Application Procedures” (Washington, D.C.: Fund for the Improvement of Postsecondary Education, Department of Health, Education, and Welfare, 1973). The transformative ideas FIPSE professed were also fundamentally different from the purposes of other contemporary federal higher education programs (Edgerton, 1973). Existing federal programs like Upward Bound or Talent Search, were designed to remediate or assimilate students of color or poor students to higher educational systems. This work was aligned more closely with the type of culture-of-poverty vision advanced by Moynihan in his infamous report “The Negro Family: The Case for National Action” (Department of Labor, Office of Planning and Research, 1965). Moynihan famously argued that Black Americans, in particular, “in terms of ability to win out in the competitions of American life, are not equal to most of those groups with which they will be competing” (1). Detractors quickly took notice, reasoning that if the function of college was to homogenize society and acculturate individuals into dominant institutions, then the current structures in higher education would work fine. However, the Newman Report argued that “if one believes that an important function of the higher education system is to offer alternative models of careers and roles, including those which challenge and change society, then the homogenization of higher education is a serious problem” to both social and economic growth (16). In sum, FIPSE, like the Newman Report before it, presented a counterargument to culture-of-poverty assimilation programs: actors motivated FIPSE’s work to change systems of higher education as the only meaningful route to better serving nontraditional students, assuming the federal government had a stake in economic and civic statebuilding endeavors.

of excellence in an increasingly egalitarian society” (emphasis added).⁹⁵ Following the Newman Report’s finding that attrition rates were “strikingly lower” when college formats were adapted to the needs of specific groups of students, FIPSE’s early leadership consciously focused the Fund’s efforts on diversifying and reforming postsecondary structures to open up new educational possibilities outside of the monolithic structures in higher education that “thwart the aspirations of large numbers of ethnic minorities, poor whites, women and blue-collar youth.”⁹⁶

As the agency released its annual calls for proposals to institutions of higher education, early FIPSE managers stressed their commitment to achieving equity goals through an agency “responsiveness” to innovative ideas percolating in the field.⁹⁷ FIPSE released deliberately open-ended grant guidelines that made it clear that it was not limiting its grantmaking activity to well-established or highly ranked institutions of higher education, nor to programs using more heavily trodden paths or approaches to pedagogy.⁹⁸ Rather, FIPSE aimed to reorient the federal government’s helping hand to higher education communities and programs that did not conform to existing standards of merit and excellence, with the hope that these innovative programs would redefine such standards and what quality postsecondary programming looks like.

These goals were tangibly reflected in FIPSE’s outputs in its first several years, including the emphasis in its annual grant guidelines, the types of grant recipients funded in its early years, and the

⁹⁵ Edgerton, “Washington’s New Reform Fund,” 14.

⁹⁶ McNett, 1973, p. 13. On attrition rates, see Newman and Cannon, *Report on Higher Education*, 3. On the focus of FIPSE leadership, see Ian McNett, “The Federals as Reformers.,” *Change* 5, no. 1 (1973): 61.

⁹⁷ See, e.g., Trotter, 1975 Appropriations Hearing March 18, pg 1104; as well as Virginia Smith’s testimony before Congress, “Office of the Assistant Secretary of Education,” Pub. L. No. HRG-1974-HAP-0031, § House Committee on Appropriations, Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations (1974). This reference to “field responsiveness” was also a repeated pattern in retrospective interviews we conducted with FIPSE’s staff in 2017. Over 30 years later, every member of the FIPSE staff interviewed from this era used similar language to describe FIPSE’s theory of action, calling it “field-driven,” “field responsive,” and open to “local innovation.” These approaches were critical, they reported, to uncovering and implementing new ways of structuring postsecondary education and attenuating established patterns of operation steeped in a legacy of white supremacy.

⁹⁸ See, e.g., “Program Information and Application Procedures,” 1973; “Program Information and Application Procedures” (Washington, D.C.: Fund for the Improvement of Postsecondary Education, Department of Health, Education, and Welfare, 1974). This was also confirmed via multiple, retrospective interviews with former FIPSE staff conducted in 2017.

types of reform projects and beneficiaries (e.g., students of color) highlighted by FIPSE representatives in congressional testimony. During its first decade, FIPSE consistently centered calls for equity-focused proposals in the annual grant guidelines it issued to institutions of higher education. As seen in Figure 2, equity priorities accounted for about 30-60% of the funding guidelines issued by FIPSE each year from 1973-1985. These equity priorities were likewise reflected in the types of recipients and programs that were funded by the agency. For example, speaking before the House Subcommittee on the Department of Labor and Health, Education, and Welfare Appropriations in 1975, the Assistant Secretary of Education, Virginia Trotter, boasted that in its first three years of work, FIPSE’s innovative grantmaking efforts “have tackled such diverse delivery problems as bringing secondary education to rural areas of Mississippi and Vermont, serving vocational needs of Eskimos in remote Alaskan villages, making the rich educational resources of museums available to community and educational groups; and providing low-cost educational services to those who cannot go to campuses.”⁹⁹ Lastly and importantly, “as a result of these grants” truly new, system-changing work was being done: “a few significant new institutions have been established and are now operating; hundreds of new programs in existing colleges and universities are now better serving students at those institutions; thousands of minority students now have *effective access to higher education*” (emphasis added).¹⁰⁰ Assistant Secretary Trotter emphasized this last point: that while programs to increase access were doing important work in reforming the higher education system, FIPSE’s role was one of “provid[ing] incentive funds for institutions” to invest in programs that allow the federal government’s investment in student aid to actually pay off, and accommodate a new wave of diverse postsecondary students.¹⁰¹

⁹⁹ Subcommittee on Department of Health, Education, and Related Agencies. See also testimony on FIPSE’s service to rural and tribal communities on p. 1115 of “Education Division and Related Agencies Appropriations,” Pub. L. No. HRG-1975-HAP-0089, § House Committee on Appropriations, Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations (1975).

¹⁰⁰ Our analysis of FIPSE’s grant guidelines from 1973-1985 bolster this point. Between one third and one half of the agency’s priorities in this period explicitly reference issues of race, identity, or inequality, while the remaining priorities emphasize modes of system change that would either support new efficiencies or incentives within existing institutions or the formation of new institutional or program types outside of existing normative molds. See Figure 2 for reference.

¹⁰¹ Subcommittee on Department of Health, Education, and Related Agencies. See also, university President Eugene Binder’s testimony on the pivotal role of FIPSE in establishing “CAMP” a program supporting the enrollment and

FIGURE 1 ABOUT HERE

Over the course of the next several years, FIPSE's Directors continued to drive home the message to Congress that "FIPSE's willingness to support innovative and unusual programs in higher education is well established... [and has] afforded the analysis and exchange of ideas that are crucial to the improvement of supportive services for nontraditional college students."¹⁰² Citing the agency's commitment to "solicit and support locally-designed projects,"¹⁰³ FIPSE returned to Congress over the years with requests for additional funding in order to pursue new and innovative racial equity work focused on addressing "the needs of previously underserved groups for effective professional education, and the needs of hard-pressed institutions, traditionally Black colleges and urban universities, to strengthen their goals and management structures."¹⁰⁴

As the Nixon Administration's concerns about maintaining institutional quality were traded out for those about improving equity during the 1970s, the coalition of support surrounding regressive "quality" arguments was gently sidelined. An equity focus largely prevailed at FIPSE in its first formative years as it became a fierce and vocal defender of equality-oriented innovation in institutions of higher education. But as quality concerns faded into the background in the first decade or so of FIPSE's existence, an important seed, "scarcely noticed at the time" was planted. The Nixon Administration had articulated a clear, quality-focused alternative to equity-based federal initiatives in higher education, producing a defined set of language on a policy idea that, Moynihan would wistfully suggest just two short years after its defeat, "is worth reading if only to recognize that the federal establishment can

success of the children of Mexican, migrant farm laborers in St. Edward's University in "Hearings on the Reauthorization of the Higher Education Act and Related Measures," Pub. L. No. HRG-1979-EDL-0002, § House Committee on Education and Labor, Subcommittee on Postsecondary Education (1979), p. 463.

¹⁰² "Reauthorization of the Higher Education Act and Related Measures," Pub. L. No. HRG-1979-EDL-0002, § House Committee on Education and Labor, Subcommittee on Postsecondary Education (1979).

¹⁰³ "Department of Health, Education, and Related Agencies," Pub. L. No. HRG-1980-SAP-0010, § Senate Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (1980), 886.

¹⁰⁴ Department of Health, Education, and Related Agencies, 889. See also testimony by James Symington, FIPSE's Board chair in "Hearings on the Reauthorization of the Higher Education Act and Related Measures," Pub. L. No. HRG-1979-EDL-0002, § House Committee on Education and Labor, Subcommittee on Postsecondary Education (1979), p. 415.

produce such language, even if it can not necessarily summon the conviction that should underly [sic] it.”¹⁰⁵ With this, the quality argument signed off for the time being, lying dormant until the federal establishment might summon the conviction to enlist it, once again.

Return of the National Foundation Ethos: Sounding the Quality Alarm on FIPSE (1981-1999)

After a decade of federal student aid distribution and federal grants for transformative reforms aimed at creating more inclusive and welcoming learning environments for minoritized students, institutions of higher education entered a new era. Formerly white (only)-serving institutions of higher education were now home to a new generation of minoritized students. The shock of the wave of civil rights wins in the 1960s and early 1970s was no longer fresh in the public consciousness, even as the effects of those wins by way of noticeably expanded access to higher education spaces, among other public goods, were. In other words, pro-equity public sentiments were no longer red hot, and the movement’s effects were no longer merely symbolic. White Americans sometimes found themselves living, working, and learning in spaces originally made only for them, but now open to all.

By the end of this decade, the politics of higher education began to take a turn. As Ronald Reagan entered the White House, conservative critiques had shifted toward an interrogation of whether federal investments in minoritized students were paying off, after all. As governor of California, Reagan helped formulate these talking points. In a speech at a press conference in 1967 that is commonly considered a turning point in federal higher education policy and politics, Governor Reagan, like soon-to-be-President Nixon, questioned the idea of higher education as a federally financed public good: why should taxpayers foot the bill for teaching students to protest? If the federal government was going to subsidize higher education, Reagan argued, then it must have economic returns for the country at large. Reagan and his party wanted to make sure that if poor folks were allowed to go to college, it was for one thing and one thing only: to bolster the economy, and certainly not to learn to resist.

¹⁰⁵ Moynihan, “The Politics of Higher Education,” 128.

Shortly upon assuming office, therefore, the Reagan White House focused attention on restricting federal financial aid programs for students. During its tenure, the Reagan Administration decreased the Pell Grant by a quarter (despite inflation), thus making student loans – both subsidized and not – more common and more necessary, even as it made interest payments ineligible for tax deductions.¹⁰⁶ But the Administration added an additional and critical prong to its legacy in higher education politics: the political urgency of postsecondary quality in preserving the American legacy. This revived “quality” agenda would create new mechanisms for accountability, anti-Black rhetoric, and funding decisions for decades to come.

The first signs of looming problems for FIPSE’s equity agenda emerged in 1981 when President Reagan commenced his Administration’s infamous across-the-board budget cuts and administrative freezes for federal programs and agencies. In this first year, FIPSE would face a number of challenges to its equity-focused grantmaking activities, the most bold instance coming in the form of a failed *coup* attempt by Reagan’s new Secretary of Education, Terrell Bell, to take control of the Fund.¹⁰⁷ Upon learning of the power grab, Congress reversed the change before appropriations were approved, but not without re-emphasizing the importance of protecting the authority that Congress initially granted to FIPSE to carry out its equity projects.¹⁰⁸

¹⁰⁶ While Reagan’s rollback on federal Pell grants affected all low-income students for the next several decades, it had (and continues to have has) particularly harmful and lasting effects on Black college students. Black students’ lack of family wealth as compared to white students, combined with the severe underfunding of colleges that predominantly serve them (e.g., the top 10 HBCUs have a combined \$2 billion endowment compared to the top 10 predominantly-white colleges and universities which have a combined \$200 billion endowment which they can use to subsidize university services as well as institutional student aid) has resulted in a greater dependence among Black students on federal aid programs (e.g., the top 10 HBCUs have a combined \$2 billion endowment compared to the top 10 predominantly-white colleges and universities which have a combined \$200 billion endowment which they draw from to subsidize university services as well as institutional student aid). These factors combined mean that Black students are typically first in line to be the most harmed, intergenerationally, by cuts to the Pell grant program (Davis et al. 2021).

¹⁰⁷ In 1980 the Department of Education, formerly a subdivision of the Department of Health, Education, and Welfare, became its own cabinet-level Department within the Executive Branch. When submitting regulation changes to Congress for approval, the Department of Education attempted to quietly displace the authority of FIPSE’s Director by replacing the word “Director” with “Secretary” in the 1982 Higher Education Reauthorization Act. Under these changes, the Secretary of Education would be the one to directly administer FIPSE operations and programs. “Hearings on the Reauthorization of the Higher Education Act Vol. 8,” Pub. L. No. HRG-1985-EDL-0086, § House Committee on Education and Labor, Subcommittee on Postsecondary Education (1985), 296.

¹⁰⁸ Federal Register April 9, 1982.

Even though FIPSE consistently focused on equity issues in its annual grant guidelines to the field in its founding years, in the early 1980s the agency began to receive at first isolated and later regular questions from Congress about how the agency addresses the problem of maintaining educational “quality” in higher education. After remaining mostly dormant since the demise of the Nixon Administration’s National Foundation proposal, the idea of “quality” preservation began to crop up in congressional discussions of the agency’s mission. In a 1982 hearing before the Senate Subcommittee on Labor, Health and Human Services, and Education Appropriations, the Director of FIPSE, Sven Groennings, was asked, out-of-the-blue: “what can the Fund do about problems of quality in postsecondary education?”¹⁰⁹ The Director offered an indirect response that referenced the agency’s long-standing repertoire of strategies for enacting transformative change in the educational experience, but without referencing either a “quality” crisis or the “equity” purposes of this work:

“FIPSE projects have been attempting to improve educational quality in the following ways: by supporting improvements and innovations which are learner-centered... and, by supporting the development of educational technologies and teaching techniques that assist people to learn through various ways and methods.”¹¹⁰

In contrast to its frequent and vocal boasting of its equity programs in preceding years, these agency responses avoided direct allusions to FIPSE’s equity commitments or accomplishments. In response to new existential threats to its existence and interrogations of the value of its work, FIPSE staff began to learn to talk *around* its fundamental equity mission. For instance, in anticipation of the across-the-board budget cuts that the Reagan Administration promised, FIPSE was asked by Congress in March of 1981 to

¹⁰⁹ “Hearings Before the Department of Health, Education, and Related Agencies,” Pub. L. No. HRG-1982-SAP-0023, § Senate Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (1982). This question was asked and answered as part of a previously prepared written statement submitted during the 1982 appropriations hearings in the House. While it is unclear who posed the question, it seems unlikely that it came from Democratic members of Congress who, during committee hearings, were dismissive of the idea of the existence of a “quality” crisis in higher education. It is more likely that the Office of the Secretary of Education included this question as it is consistent with other contemporaneous actions by the Office to advance a quality agenda.

¹¹⁰ “Hearings Before the Department of Health, Education, and Related Agencies,” Pub. L. No. HRG-1982-SAP-0023, § House Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (March 12, 1982).

justify its projects and objectives in light of these more constrained resource conditions.¹¹¹ In testimony before the Senate Subcommittee on Labor, Health and Human Services, and Education Appropriations, FIPSE's interim director cited the agency's expert reputation, its metrics on innovation and cost effectiveness, its locally oriented grantmaking strategies, and even the agency's "brand recognition" but was careful not to mention the equity challenges still facing institutions of postsecondary education as a justification for FIPSE's continued funding:¹¹²

"With all due respect, I think what we [FIPSE] have in this particular case is something that is what you might call in the commercial world 'brand recognition' and a very extraordinary track record. If the fund were cut as the rest of the educational enterprise is being cut, we would lose what the projects are together - a national pool of information, of talent, expertise, experience, that can significantly help the educational-enterprise in adjusting to these very difficult times that we face."¹¹³

Over the course of the next several years, FIPSE would continue to publicly tout its flexibility, expertise, "cost effectiveness," and the local success of its projects; but unlike in the 1970s, it would do so with very few references to its equity work.¹¹⁴

Yet even as FIPSE grew quiet about its equity work in public discussions around Washington, its grantmaking activities and decision making remained laser-focused on funding equity programs at postsecondary institutions in the early 1980s. In its grant guidelines to the field, FIPSE continued to focus three out of six priorities on the educational experience of underserved populations and/or racial equity

¹¹¹ "Hearings Before the Subcommittee on Department of Health, Education, and Related Agencies," Pub. L. No. HRG-1981-SAP-0042, § Senate Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (1981), 547.

¹¹² Hearings Before the Subcommittee on Department of Health, Education, and Related Agencies.

¹¹³ Hearings Before the Subcommittee on Department of Health, Education, and Related Agencies, 547.

¹¹⁴ One might wonder if the inequalities in higher education had been sufficiently diminished by the early 1980s such that FIPSE staff thought it appropriate to shift gears. However, longitudinal, empirical studies of stratification and student outcomes do not support this hypothesis. Racial inequality was still a relevant issue in institutions of higher education in the early 1980s. See, e.g., Julie R. Posselt et al., "Access without Equity: Longitudinal Analyses of Institutional Stratification by Race and Ethnicity, 1972–2004," *American Educational Research Journal*, March 28, 2012; William T. Trent, "Equity Considerations in Higher Education: Race and Sex Differences in Degree Attainment and Major Field from 1976 through 1981," *American Journal of Education* 92, no. 3 (May 1, 1984): 280–305.

(see Figure 1). As the leadership at FIPSE abandoned its more public-facing pronouncements of its equity mission, its material outputs continued to be directed towards the projects that prioritized the educational needs of a more diverse postsecondary student body.

But these new, pointed inquiries from conservatives in Congress and the White House into FIPSE’s “educational quality” accomplishments grew louder each year. Reagan appointees at the Department of Education started to do some of this more discursive, reorienting work on behalf of FIPSE in congressional hearings. In 1983, when asked before a House committee about FIPSE’s noteworthy initiatives, Reagan’s Assistant Secretary of Postsecondary Education, Edward M. Elmendorf, submitted a prepared statement that led with the heading “Quality Programs for all Postsecondary Students.” He offered a two-part argument framing FIPSE’s purpose. He noted first that “most institutions have enrolled more minority students, women, elderly, or part-time students in the last decade than ever before-and this tendency will continue in the years ahead.”¹¹⁵ However, the transformative, equity-driven programs that were developed for these new students in the 1970s under the guidance of agencies like FIPSE, he argued, should now be redirected so that they benefit *all* learners and be made more “mainstream.”

Calling for a transition away from initiatives aimed at the needs of minoritized students, Assistant Secretary Elmendorf suggested it was now time to shift attention and resources back to the development of “quality programs for all.” He offered two suggestions for this redirection of resources. First, in order to decrease attrition among minoritized students, Elmendorf suggested that rather than instituting transformative, resource-demanding, equity-based reforms, these students should simply be redirected to remedial programs. This suggestion betrayed FIPSE’s original call to arms that the road to greater equity lies in transforming institutions, not siloing minoritized students within them. Second, Elmendorf identified a number of subject areas, including math and science education, in which postsecondary educational “quality” had been slipping and was now in need of extra attention and resources.

¹¹⁵ “Departments of Labor, Health and Human Services, Education, and Related Agencies Appropriations for 1984: Part 6,” Pub. L. No. HRG-1983-HAP-0026, § Subcommittee on Labor, HHS, and Education Appropriations, House Committee on Appropriations., 1 (1983), page 781.

These statements echoed concerns outlined in the Administration’s high-profile 1983 report, *A Nation at Risk*, which was commissioned by Reagan’s first Secretary of Education, Terrell Bell, in 1981. Bell chartered a commission of education and policy experts to “examine the quality of education in the United States and to make a report to the Nation.”¹¹⁶ *A Nation at Risk* became one of the Reagan Administration’s defining contributions to centering fears about the educational quality of American schools and colleges.¹¹⁷ Channeling nationalistic, Cold War insecurities about America’s failing international standing, *A Nation at Risk* warned against the “rising tide of mediocrity” that was eroding the remarkable “educational foundations of our society” and the nation’s “once unchallenged preeminence in commerce, industry, science, and technological innovation” now “being overtaken by competitors throughout the world.”¹¹⁸

This renewed focus on school quality was soon incorporated into FIPSE’s mission by the Department of Education. This began in earnest with documenting and publicizing a ‘crisis of quality’ in institutions of higher education. To do so, Secretary Bell formed a study group at the National Institute of Education (NIE) on *The Conditions of Excellence in American Higher Education* in 1985. The group issued a report warning of the threat to postsecondary educational excellence posed by the “massification” of the postsecondary student body. In materials submitted to Congress, the Department of Education started to position discussions of FIPSE initiatives under the header “Fostering Excellence in Education”

¹¹⁶ National Commission on Excellence in Education, “A Nation at Risk: The Imperative for Educational Reform,” *The Elementary School Journal* 84, no. 2 (1983): 113–130.

¹¹⁷ Study Group on the Conditions of Excellence in American Higher Education, “Involvement in Learning: Realizing the Potential of American Higher Education” (National Institute of Education, October 1984). Secretary Bell commissioned this report from the NIE in 1984 asking the study group to develop responses to the “problem” of educational excellence in higher education.

¹¹⁸ National Commission on Excellence in Education, 1983. According to education scholars, *A Nation at Risk* has had an enduring and unparalleled impact on educational policy rhetoric (Mehta, Jal. “Escaping the Shadow: A *Nation at Risk* and Its Far-Reaching Influence.” *American Educator* 39, no. 2 (2015): 20). The Report’s fearmongering tone on quality concerns shifted the focus from how education could be used to achieve equality to how education functions as a means of economic competition, ultimately creating a trade-off between equality and competition. In doing so, the Report is often credited as a watershed moment that turned American educational politics toward “standardized achievement tests, the support of ability grouping and tracking, and the subsequent consideration of school choice initiatives” (McIntush, Holly G. “Defining Education: The Rhetorical Enactment of Ideology in *A Nation at Risk*.” *Rhetoric & Public Affairs* 3, no. 3 (2000): 419–43) – a trifecta of policies used to reinscribe the segregation of resources and educational dignity under new terms.

and described FIPSE as the federal vehicle for addressing “the primary national concern in education: improving the quality of education.”¹¹⁹ This characterization stood in stark contrast to the equality priorities consistently emphasized in FIPSE’s annually published guidelines to the field (see Figure 1).

A 1985 Congressional Research Service Report likewise offered an appraisal of whether FIPSE was adequately addressing “current concerns” about “postsecondary excellence” in the U.S., citing both the NIE Report’s findings as well as the Nixon Administration’s original warnings and proposal to create a National Foundation for the purposes of maintaining excellence and distributing federal aid to elite institutions of higher education.¹²⁰ This non-partisan report was intended to provide necessary program background and a discussion of issues for each title of the HEA,¹²¹ but these issues were shaped by the crisis language being disseminated by *A Nation at Risk* and the NIE report. With the implications of these reports now ‘in the water,’ the Congressional Research Service Report urged FIPSE to more consciously foreground and be responsive to postsecondary educational quality concerns in its grantmaking work:

“Though many of FIPSE’s goals and activities appear consistent with some of the recent postsecondary school reform efforts, *a more explicit recognition of ‘excellence’ in the FIPSE legislation might serve to bring greater and more immediate-attention to the improvements needed in postsecondary education.* One of FIPSE’s goals is to be responsive to the concerns and needs of the postsecondary community. During this period when national concern is focused on ‘realizing the potential’ of postsecondary education, FIPSE might be used as the Federal entity for promoting the goal of excellence in higher education.”¹²² [emphasis ours]

¹¹⁹ “Hearings Before the Departments of Labor, Health and Human Services, Education, and Related Agencies Appropriations for 1985 Part 6: Department of Education,” Pub. L. No. HRG-1984-HAP-0083, § House Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (1984); “Supplemental Appropriations for 1984,” Pub. L. No. HRG-1984-HAP-0049, § House Committee on Appropriations, Subcommittee on Labor, Health and Human Services, and Education Appropriations (1984).

¹²⁰ Congressional Research Service, “Reauthorization of the Higher Education Act: Program Descriptions, Issues, and Options” (U.S. Government Printing Office, February 1, 1985).

¹²¹ Congressional Research Service, 1985.

¹²² Congressional Research Service, 435.

Throughout these testimonies, the nature of the “quality” focus that was called for by the Administration and Republicans in Congress remained vague and typically referred to something higher education once had and had now lost as the composition and character of higher education institutions changed.

The administrative jockeying over the focus of FIPSE’s work only intensified following the appointment of Reagan’s second Secretary of Education, William Bennett, in 1985. An ivy-league educated former history professor, Bennett beat the same drum regarding student aid and personal responsibility. He repeatedly invoked welfare-queen-like rhetoric to characterize college students as lazy, prone to abusing the state’s resources, and therefore undeserving of the government’s help. In a particularly telling and notorious soundbite from a 1985 news conference, Bennet rebuffed claims that the Administration’s divestiture from federal student aid programs was a divestiture from honest, hardworking students who want to go to college. Rather, Bennet insisted, the main effect of the proposed cuts would be “stereo divestiture, automobile divestiture, three-weeks-at-the-beach divestiture.”¹²³

The Administration thus identified a two-pronged crisis for higher education in the nation: newly admitted groups of students were not only misusing public resources, but they were also failing to “pay off” as investments to be reaped not by minoritized students, but by the nation [white people, the economy] at large. The solution, as advanced by the administration, was clear--a shift from measuring inputs to measuring outputs as a means of quality control. In a speech before Congress in 1985, Bennett posited that:

¹²³ See e.g., Associated Press. “Bennett Sees ‘Divestiture’ of Cars, Stereos.” Los Angeles Times, February 11, 1985. Note that there was also the virulent backlash to this characterization of Pell grant students. For example, in 1985 reauthorization hearings just after Bennett’s inflammatory remarks: “Dr. Coor. I guess that is the part that bothers me most. I realize Mr. Bennett has received a lot of lumps today, and I have been among them. The ease with which phrases like welfare cheats and stereos, get embedded in peoples' minds, betray the fact that we are talking about programs here that are not giveaways. We are talking about programs here that require the families to make a substantial effort, the students to make a substantial effort, by working and by borrowing. All we are really asking is that the aggregation of that support, in a partnership between family, institutions, State and Federal Government, be able to sustain a commitment, for people can work, and can borrow and still make it possible. The unfortunate part of flip remarks like Mr. Bennett's, is to suggest that we have got a vast number of people out there getting charity from the Government, and it does not accurately portray what has been a carefully crafted, a multiple contribution program.” (Hearings on the Reauthorization of the Higher Education Act, Part 1, Pub. L. No. HRG-1985-LHR-0017, § House Committee on Education and Labor, Subcommittee on Postsecondary Education (1985), 164).

“Accreditation standards, following the standards most commonly used by institutions themselves, have traditionally measured quality in terms of institutional resources -- such as endowment per student, percentage of faculty with doctorates, or the number of books in the library -- with little or no attention paid as to what effects they have or what results they yield.”¹²⁴

In this observation, Bennett sets up an argument for accountability for quality outcomes rather than the quality of inputs. However, this excerpt simultaneously reminds us that these pre-civil rights, input-based quality standards had always been highly correlated--due to segregationist postsecondary politics--to the relative, historical whiteness of the institution. These same metrics were also used to determine institutional eligibility for federal funding (including student aid) and prestige. Changes to these types of metrics can be powerful tools for transformation and could take the field in multiple directions--both more and less equitable. Bennett pushed, in the same testimony, to move towards an “emphasis on student learning [rather than just] on the resources and procedures of the institution. Unless they examine student learning, they cannot really gauge educational quality.”¹²⁵ He motivates this issue with the anecdotal observation that the lack of standards has resulted in “some employers confronting job applicants with a bachelor's degree who are unable to write competently, speak lucidly, or perform more than the most elementary mathematical procedures”¹²⁶ an apparent contrast to an unspecified “good-old-days” period of higher quality standards prior to the expansion of postsecondary access.

The potential policy impacts--whether equitable or inequitable--of the administration’s turn away from measuring only inputs (correlated with whiteness) as proxies for “quality” hinges on what and how the new administration understands and therefore will measure that quality.

¹²⁴ Quality in Higher Education, Pub. L. No. Senate Hearing 99-732, § Senate Subcommittee on Education, Arts, and the Humanities, Committee on Labor and Education (1986), 12.

¹²⁵ Quality in Higher Education, 13.

¹²⁶ Quality in Higher Education, 24.

In 1984, just prior to his transition into the role of Secretary of Education, Bennett led the development of a commissioned report that offered a look at what he, and by proxy, the Administration was indexing by way of “quality” rhetoric. Bennett’s report, written on behalf of the National Endowment for the Humanities and entitled *To Reclaim a Legacy*, was a treatise on the state of the humanities in U.S. higher education.¹²⁷ The report offered a clear foreshadowing of what the argument, soon to be mobilized in the Department of Education, was really all about. In *To Reclaim a Legacy*, Bennett argued that the increased diversification of higher education, while commendable, had fundamentally threatened the legacy and exceptionalism of American higher education. How? The students who have now made it to campus, via their demands for cultural representation and inadequate levels of preparation, have both diluted and perhaps even poisoned the American legacy of excellence by forcing institutions to move away from the teaching and preservation of unadulterated western heritage – a marker of “quality” learning.

In the report, Bennett prefaces that the field of education “is beginning to ask, and has the right to ask, whether today's colleges and universities are offering to America's youth an education worthy of our heritage.”¹²⁸ According to Bennett, this doubt is justifiable, especially given the fact that “as higher education broadened” and more minoritized students gained access to higher education spaces, college “curriculum became more sensitive to the long-overlooked cultural achievements of many groups, what Janice Harris of the University of Wyoming referred to as ‘a respect for diversity.’”¹²⁹ But such changes, Bennett worried, were devaluing the potential contributions of the college educational experience: to learn and master the lessons of western civilization.

“[O]ur eagerness to assert the virtues of pluralism should not allow us to sacrifice the principle that formerly lent substance and continuity to the curriculum, namely that each college and university should recognize and accept its vital role as conveyor of the

¹²⁷ Bennett, William J. *To Reclaim a Legacy: A Report on the Humanities in Higher Education*, 1984.

¹²⁸ *To Reclaim A Legacy*, pg. 10.

¹²⁹ *To Reclaim A Legacy*, pg. 38.

accumulated wisdom of our civilization. We are a part and a product of Western civilization... It is not ethnocentric or chauvinistic to acknowledge this. No student citizen of our civilization should be denied access to the best that tradition has to offer.”¹³⁰

Arguing that 1970s efforts to reform higher education systems to make them more inclusive of the experiences of a more diverse student body were diminishing the quality of a college education in the U.S., Bennett urged a nostalgic turn back – away from a curriculum loosely catering to a “respect for diversity,” and towards a curriculum rooted in that which unites us and is “the glue that binds together our pluralistic nation”: the history and “ideas descended directly from great epochs of Western civilization.” As such, Bennett urged, “leaders/policymakers must ask: ‘Does your curriculum reflect the best judgment of the president, deans, and faculty about what an educated person ought to know or is it a mere smorgasbord or an expression of appeasement politics?’”¹³¹

Upon assuming his position as the Secretary of Education in 1985, Bennett’s piercing questions from 1984 were likewise soon directed to FIPSE, the agency now under his charge that had done more over the last decade than any other to transform colleges and universities into more equitable and inclusive institutions. FIPSE once again came under direct attack by the Administration. Soon after assuming leadership of the Department, Secretary Bennett appointed ex-Nixon advisor and architect of the Nixon-era National Foundation proposal, Chester Finn, to be the Department’s new Assistant Secretary of the Office of Educational Research and Improvement. Bennett and Finn developed a proposal to disband FIPSE and, after that failed, attempted again to institute a reorganization plan that shifted administrative authority from FIPSE’s Director and Board to the Department of Education. At the apex of this conflict, as long-term FIPSE administrators were feeling pressured to hide and obscure the agency’s equity-driven mission work from the Administration and Republicans in Congress, FIPSE’s Board stepped in to secure the agency role envisioned by its founders—one that aimed to protect the

¹³⁰ To Reclaim A Legacy, pg. 50.

¹³¹ To Reclaim A Legacy, pg. 51.

Fund's discretionary authority to fund projects that helped to fulfill its comprehensive, system-changing, equity-driven mission.¹³²

In 1985, the FIPSE Board Chair, Lieutenant Governor of Vermont Peter Smith, appealed to the House Subcommittee on Postsecondary Education to protect FIPSE's authority to engage in equity-centered work and presented a lengthy case detailing FIPSE's successes and the unsavory ideological intentions behind the NIE and *A Nation at Risk* reports commissioned by the Department of Education.¹³³ In his testimony, Lieutenant Governor Smith applauded FIPSE for "following both the letter and the spirit of its legislation" and for conducting grantmaking work that "has been extraordinarily successful both as a structural and as a substantive force for change in postsecondary education."¹³⁴ Advising the House Subcommittee on Postsecondary Education that "FIPSE is under serious attack from within the Office of the Secretary of Education," Smith warned the Committee that "the program as it was designed, as we know it, as it has operated for years, will be dramatically changed if no action is taken." Smith described how exactly the Department of Education's reorganization plan would fundamentally change FIPSE's operations and cited the outrage of actors like the American Council on Education and Senator Stafford, Chairman of the Senate Subcommittee on Education, Arts, and Humanities, who intervened forcefully to prevent FIPSE's reorganization and to preserve its authority "independent of the regular Education Department bureaucracy."¹³⁵

Lieutenant Governor Smith also complained of Bennett and Finn's attempts to unilaterally change FIPSE's grant guidelines, submitting evidence to the subcommittee of the proposed changes: a side-by-side comparison of FIPSE's "field driven" equity guidelines and the Secretary's proposed replacement guidelines (see Figure 3). Smith underscored to Congress that the proposed changes eliminated FIPSE's

¹³² McNett, "The Federals as Reformers."; Smith, "Fipse's Early Years."

¹³³ Hearings on the Reauthorization of the Higher Education Act Vol. 8. (1985). Smith also brought a team with him and corroborated these statements with enthusiastic testimonies from the field (e.g., from the American Council on Education), including a fellow panelist, John W. Fuller, who was President of the Great Lakes College Association and a former FIPSE grantee.

¹³⁴ Hearings on the Reauthorization of the Higher Education Act Vol. 8. (1985), 297.

¹³⁵ Robert T. Stafford, "Resignation of Sven Groennings," Pub. L. No. 131 Cong Rec S 13389 (1985).

equality and non-conventional learners agenda, and in its stead included jarring new additions, like an emphasis on regulation and measuring institutional quality, and renewing an undergraduate liberal arts education that emphasizes “the intellectual and cultural heritage of western civilization.”¹³⁶ The Department of Education, Smith argued, was not only engaged in a reorganization of the mission of this small civil rights agency, but it was doing so in order to dismantle its equity agenda and instate a more supportive structure for maintaining higher education’s system of social stratification. The Department of Education’s guidelines proposed a centrally administered Fund that would focus on “renewing” attention to *quality* standards that upheld white supremacist notions of the nonpareil status of the western canon, which embodied the very structures FIPSE’s original equality efforts were designed to erode.

FIGURE 3 ABOUT HERE

Some congressional representatives listening to FIPSE’s plea were eager to name the white supremacist intentions behind the Department of Education’s call for funding priorities to focus on preserving educational “quality.” In a scathing critique, Representative William D. Ford (D-MI), for instance, revealed a deep skepticism about the race-neutral intent of the Administration’s “quality” arguments, identifying the consequences these changes would have for protecting and reinforcing a more elite- and white-serving tradition in institutions of higher education. The prioritization of “the intellectual and cultural heritage of western civilization,” he noted, was “clearly the most elitist definition of how one would approach evaluating higher education that you can put in two short sentences...and it sounds very familiar.” Ford argued that the Department of Education’s proposed guideline changes failed to recognize the evolving educational needs of an increasingly diverse nation and speculated about the intentions behind the Secretary’s demand that all students become more literate in the “heritage of Western civilization,” saying “I have no doubt at all that he [Secretary Bennett] could define that term for me very precisely. *He knows exactly what it is*” (emphasis ours).¹³⁷

¹³⁶ Proposed guidelines submitted to the House Committee during the Hearings before the Departments of Labor, Health and Human Services, Education, and Related Agencies Appropriations for 1985 Part 6: Department of Education).

¹³⁷ Hearings on the Reauthorization of the Higher Education Act Vol. 8 (1985), 308, 9.

Indeed, the postsecondary field at large knew exactly what Bennett was saying. By 1989, a report published by the Association for the Study of Higher Education confirmed that Secretary Bennett, by “stressing Western civilization... sen[t] a symbolic message that the history and culture of the non-Caucasian world does not matter.”¹³⁸ The report argued that the “continuing message that a fundamental conflict exists between issues of access...and quality is perhaps the most disturbing indication that present institutional approaches to diversity are inadequate.” Referencing the quality panic in higher education and the wave of calls to increase standards of quality that accompanied it, the report noted that:

“Much of the discussion about improving institutional quality focuses on perceptions about the quality of the students being admitted and concern about lowering standards, although these perceptions can also be found in discussions about hiring and retaining faculty and staff... There is reason to believe that the questions being asked and the assumptions being made result in an inappropriate conflict between these two central values...The concern about the preparation of students, while affecting many minority students, is not a minority problem.”¹³⁹

The Department of Education’s use of and reliance on quality rhetoric, the report underscored, was tantamount to white supremacy and sent a clear message that one must not only be “economically qualified” to obtain the advantages of higher education, but also willing to assimilate to white institutions which have and shall remain unchanged.

Following Ford’s testimony at the 1985 hearing, Congress amended the language in the Higher Education Act of 1965 to reinforce FIPSE’s authority over setting grant guidelines and awarding grants, requiring only the approval of its Board.¹⁴⁰ However, shortly before this amendment, Secretary Bennett fired FIPSE’s director, Sven Groennings and appointed Charles Karelis, a long-time friend and fellow ivy-

¹³⁸ Smith et al report, p. xvii

¹³⁹ Smith Report, p. 63

¹⁴⁰ Stafford, R. T. *Reauthorization and Revision of the Higher Education Act of 1984*, Pub. L. No. 99 S. 1965 (1985-1986) (1986). Specifically, the new language affirmed that no grants could be executed by the Secretary of Education without approval by FIPSE’s National Board “under procedures established by the Director.” p. 305 of the Higher Education Amendments of 1985.”

league educated humanities professor, to the position.¹⁴¹ Despite this congressional effort to protect FIPSE's authority to pursue its equity mission, with Karelis now at the helm, FIPSE would reorient its agency goals to prioritize the quality vision articulated by the Department of Education -- and Moynihan and Nixon before it -- about what, exactly, a federal foundation for higher education should be tasked with doing.

By 1986, FIPSE had adopted the elitist language so forcefully dismissed by Representative Ford the year before. The first priority listed in FIPSE's 1986 grant guidelines — a position which had regularly been reserved for one of its three equity priorities in the past — read that “the Fund invites proposals which seek to ensure that undergraduate curricula provide the knowledge and skills which an educated citizen needs, including comprehension of our intellectual and cultural heritage.”¹⁴² The second listed funding priority provided the only nod to equity, but with an important caveat referencing quality: “proposals are solicited which seek to ensure that recent increases in access to postsecondary education are made more meaningful by improving retention and completion rates *without compromising program quality* (emphasis added).”¹⁴³ By the third listed priority, the guidelines returned more fully to addressing quality concerns, calling for proposals focused on developing metrics for protecting quality and institutionalizing those protections.”¹⁴⁴ In this new regime, the long-valued emphasis on equity was

¹⁴¹ This account is confirmed in contemporary newspapers (see, e.g., Myers, 1990), as well as in retrospective interviews with FIPSE staff of that time. Moreover, Ford recalled previous occasions in which the House Committee had been told by the Administration “leave me write it and I'll show you how to get rid of all those kids that shouldn't be getting loans in the first place.”

¹⁴² “Comprehensive Program Information and Application Procedures” (Washington, D.C.: Fund for the Improvement of Postsecondary Education, Department of Education, 1986).

¹⁴³ The directive that equity initiatives are not to “compromis[e] program quality” was, by this point, well understood. Secretary of Education William Bennett had by then repeatedly stressed in reports, congressional testimony, and public speeches what a “quality” higher education program looked like. In one of the more infamous incidents that took place a year later in 1987, for instance, Secretary Bennett, upon learning of a decision by Stanford University to “alter its western culture program to include works related to women, minorities and class,” flew across the country to sharply criticize the change. The decision to change the program, Bennett said, “was not a product of enlightened debate, but rather an unfortunate capitulation to a campaign of pressure politics and intimidation...For a moment, a great university was brought low by the very forces which modern universities came into being to oppose -- ignorance, irrationality and intimidation.” Vobejda, Barbara. “Bennett Assails New Stanford Program.” Washington Post, April 19, 1988. /

¹⁴⁴ “Comprehensive Program Information and Application Procedures.”

eroded and replaced with an emphasis on a thinly-veiled reference to conservative curriculum values with foreseeably hierarchy-reinforcing implications.

These 1986 guidelines served as a template for the FIPSE grant guidelines produced each year thereafter until the late 1990s (see Figure 2).¹⁴⁵ During that time period, FIPSE became famous for its quality agenda and the pedagogical work it funded often focused on elite institutions. The agency's mission was transformed. These funding priorities focused on preserving institutional quality not only disproportionately served predominantly white, prestigious institutions of higher education, but in the end, established standards for grant awards that overwhelmingly favored such institutions over the broad-access and more diverse institutions serving the majority of postsecondary students, in general, and underrepresented groups, in particular.¹⁴⁶ As demonstrated in Figure 3, FIPSE funding data indicates that under this new regime a majority of federal funds were targeted at doctoral and elite higher education institutions, the very types of white-serving institutions with the most to gain from upholding existing stratified and racialized standards of excellence. Previous FIPSE funding preferences aimed at two-year colleges and disruptive, external organizational types, on the other hand, decreased and were eliminated, respectively.

FIGURE 3 ABOUT HERE

By 1986, during a series of congressional hearings on the “quality crisis” in higher education, “quality” talking points had become the consensus language for everyone involved. In testimony, Reagan administration officials and a bipartisan collection of Senators affirmed the importance and prominence of educational “quality” as a chief state interest in the international landscape. In one exchange demonstrating the ubiquity of this near-universal turn away from equity and toward quality commitments,

¹⁴⁵ As demonstrated in Table 1, which was developed using compiled grant guidelines from 1973-1999, following the 1985/1986 “coup” by the Department of Education, the stark shift away from equity-oriented work continued steadily even as Administrations changed over time. Other correlated emphases emerged as well, including new special-focus programs targeting issues of drug abuse and violence on college campuses, which were riddled with racially charged language.

¹⁴⁶ McCambly, Heather, and Jeannette A. Colyvas. “Institutionalizing Inequality Anew: Grantmaking and Racialized Postsecondary Organizations.” *Review of Higher Education*, 2022.

Senator Simon appealed to the Department of Education that it must take steps to counter the pressures that colleges feel to “lower their standards, admission standards, and I fear as you lower admission standards, you lower graduation standards.”¹⁴⁷ Chester Finn, by this point serving as the Assistant Secretary of Education, enthusiastically agreed in his testimony and stoked Cold War fears. Claiming that American colleges have ceased to prioritize quality, he warned, “when you graduate from secondary schools in the Soviet Union, you have 4 years of physics. Sixteen percent of those who graduate from high school in the United States have 1 year of physics...Clearly, that is going to have to change if we are going to remain competitive in the world in which we live.”¹⁴⁸

By the mid-1980s most of Virginia B. Smith’s original staff left FIPSE. In congressional testimony, agency staff continued to build on their reputation as innovators, as experts in the field of higher education, and as thinkers about what an educated person should be, know, and experience in America in order to “strengthen the Nation.”¹⁴⁹ But they no longer claimed the mantle of working with or in poor communities or communities of color in order to achieve greater educational or economic prosperity; that vision for FIPSE had been lost. Instead, FIPSE focused its attention on asking how to measure quality, how to prove the worth of an education, and how to engage white, middle-class students in more exciting pedagogy and research. In this period, FIPSE became a clearinghouse of expertise in the reproduction of stratification.¹⁵⁰ In a self-report to Congress in 1991, FIPSE’s Director listed the agency’s recent accomplishments and contributions and enumerated the metrics, assessments, and national recognition of FIPSE as a center for measuring and assuring “quality,” learning, and measures of being an “educated citizen.” The only reference made to the advancement of equality or minoritized communities in the report was a reference to a project that was launched by FIPSE in 1975, before its equity goals had lost out to fears over the loss of educational quality.

¹⁴⁷ “Quality in Higher Education,” Pub. L. No. Senate Hearing 99-732, § Senate Subcommittee on Education, Arts, and the Humanities, Committee on Labor and Education (1986).

¹⁴⁸ Quality in Higher Education, 38.

¹⁴⁹ Quality in Higher Education.

¹⁵⁰ McCambly & Colyvas, *Institutionalizing Inequity Anew*.

DISCUSSION & CONCLUSION

In this study, we trace how policy actors developed and contested federal civil rights policy pertaining to higher education—a social domain in which rigid racial hierarchies had been both longstanding and comfortably resilient. This political history provides a template for the sequential development of a model of (e)quality politics. We define (e)quality politics as the introduction of a policy paradigm that reframes equity policy goals and objectives around the expressed need to preserve and protect the extant “quality” of institutions, spaces, or sectors of the economy targeted by civil rights policy. We argue that a regime of (e)quality politics is produced and instantiated through several stages. First, in response to policy that expands access to a shared good, (e)quality politics surfaces and manufactures a sense of threat that is rooted in concerns over what will happen to the quality of said good once it is made more widely accessible. Second, the “quality” threat posed by equal access policies elicits administrative actions to preserve and advance the status quo, often by relying on measures and standards of “quality” inscribed under more segregationist regimes. Lastly, this process contributes to the instantiation of a regime of (e)quality politics on a policy issue area—one where the terms of debate on an issue are transformed over time from those focused on equity considerations to those focused on the preservation of quality. We argue that once overt racial exclusion is delegitimized by the enactment of civil rights policies, “quality” becomes the primary tool marshaled for the maintenance of the status quo. Due to the legitimacy accorded to such metrics under previous eras of racial exclusion, quality arguments gain such precedence that, in the end, all participants engaged in discussions on the implementation of civil rights policy, even those fighting on behalf of egalitarian goals and missions, are compelled to frame their arguments in terms of quality considerations.

By tracing the introduction of quality rhetoric, as linked to notions of western heritage and western civilization, in the congressional debates and archival documents related to FIPSE’s fate into the 1980’s, we uncover a quality debate in postsecondary politics that has long been overlooked in light of the

heated political battles over student aid in this era. This anti-equity politic, when partnered with material rollbacks to student aid, became a two-part legacy. First, the administration strapped low-income Black and brown students and families with crippling debt, which they entered into with hopes of building generational wealth. And second, the administration created metrics of and norms around “quality” that cut off other potential pathways toward institutional transformation. That is, by labeling institutional attempts to welcome and respond to the needs and interests of racially diverse student populations as a threat to “quality,” students of color, strapped with greater debt, now had to choose: assimilate or get out. The political mobilization of this argument and its application as an anti-equity politic is modeled acutely via the trajectory of FIPSE over the course of the Reagan administration.

These insights are important for two reasons. First, the creation, examination, and application of “quality” standards in the context of public policy is typically discussed as the race-neutral territory of experts, not fodder for politicized racial debates.¹⁵¹ But we demonstrate that quality, while presented as a neutral and racially blind alternative to equity measures, is anything but. Using a novel extension of racial threat theory, we demonstrate how expanded access policies that threaten the existing racial hierarchy can activate a protective backlash by the dominant group in the form of prioritized quality concerns that are racialized in function (even if not typically in name) at the moment of the introduction of the racial threat. Importantly, in the case of higher education, a focus on “quality” objectives among policy elites did not surface until access to postsecondary institutions was statutorily expanded to previously excluded groups of students. We show that it was efforts to preserve the exclusionary status quo that drove the development of “quality” arguments—arguments that also appealed to a wider coalition of supportive actors who may not otherwise embrace more facially, race-conscious arguments based in exclusion.

Second, the assumed neutrality of policy priorities focused on the preservation of quality has provided cover for quieter forms of racial retrenchment that occur outside of the public eye. The story of the instantiation of a *regime of (e)quality politics* that we tell here does not take place through bold policy

¹⁵¹ See, e.g., Daniel Carpenter, *Reputation and Power: Organizational Image and Pharmaceutical Regulation at the FDA*, vol. 137 (Princeton University Press, 2014).

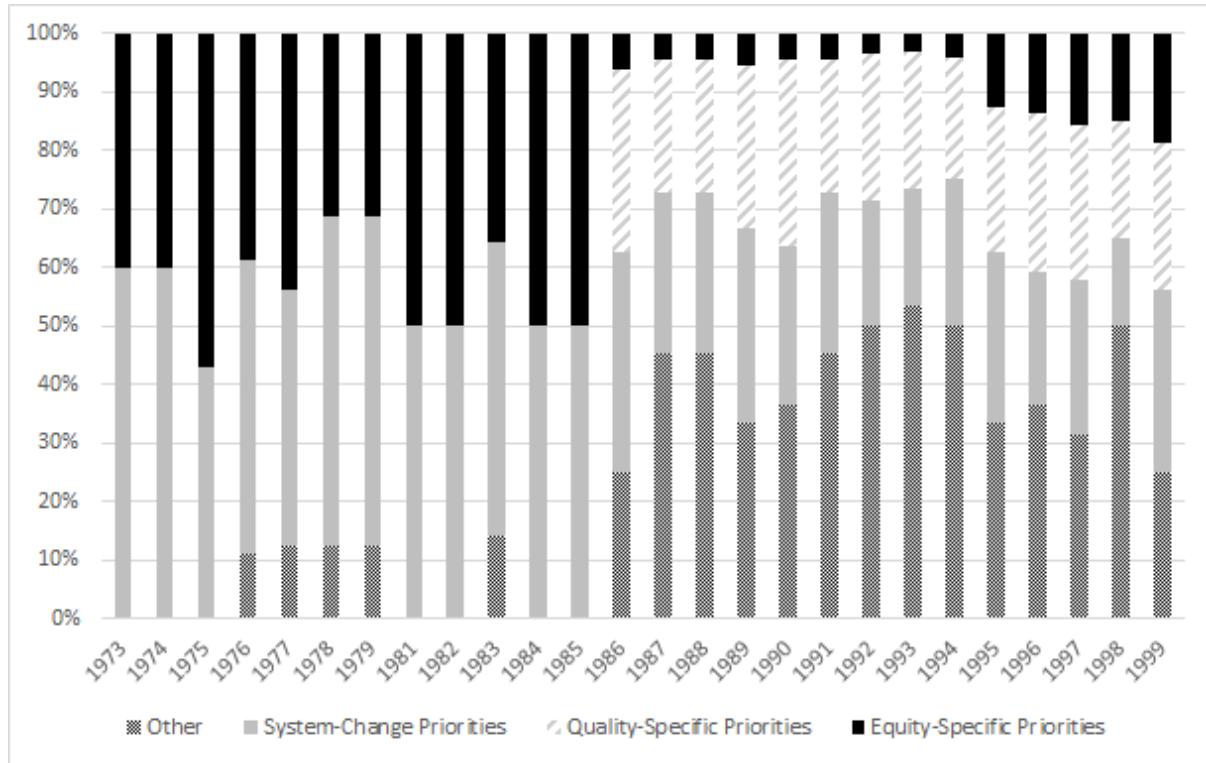
initiatives, social movements, or popular debate. Rather, we find that while public fears of racial threat were catalyzed by major civil rights policy shifts, subsequent demands to prioritize the preservation of quality were typically made and secured through longstanding, highly entrenched, and implicitly racialized organizational processes. Capturing the operation of *(e)quality politics*, in other words, requires a downward level-shift from the macro-sphere of policy *creation* to the meso-sphere of organizational processes that maintain racial hierarchies. Why? Because this is where the difficult-to-uproot and embedded practices developed under explicitly white supremacist regimes—which can be referred to benignly as markers of “quality”—are produced and reproduced via systems of legitimacy and material rewards. By the time the Higher Education Act of 1965 codified and expanded access to postsecondary education, institutions of higher education had already developed an impressive system of meritocratic ideology that reproduced inequality. We demonstrate that “quality” arguments, when emerging from policymakers’ experiences of institutionalized racial threat, activate anti-equity work at the organizational level that “doubles down” on exclusionary structures and processes. In doing so, we join an important discussion that emphasizes the need for a multi-institutional approach to thinking about how civil rights wins at the policymaking stage might be met by highly legitimized counterforces in the next.

Lastly, in order to engage in the important work of tracing the process by which equity policy wins are linked to quality concerns, we find that a developmental approach is key. The development of a regime of *(e)quality politics* on a policy issue area is defined by the sequential relationship between, first, segregated access to a public good, second, “equality” policy wins, and third, the development and eventual dominance of “quality-centered” organizational goals in agencies administering that policy. A snapshot approach to understanding policy change, especially in the highly contested space of civil rights policy, cannot capture the important ways in which quality and equality can become linked on a policy issue in the political sphere. Otherwise, quality and equality, as policy goals and as tools of enacting or disrupting social change, can look quite politically discrete, obscuring our understanding of how a process of *(e)quality politics* develops and is instantiated in a policy domain over time.

By looking back, however, we can clearly link “quality” advancements to regressive, race-conscious policy goals. This core theoretical contribution challenges the hegemonic status of quality measures that are typically characterized as neutral and objective. Instead, we provide historical evidence that such measures in fact rely on and strengthen racially contingent assumptions developed in segregationist eras about what types of institutions or spaces are considered “high quality” that, in turn, have real-world consequences for public investment and resource distribution decisions in later historical moments. As a result, references to quality become a shorthand for race-based stratification, and a way to discuss the costs of integration, and the fears of racial threat that it activates, in a race-evasive way. This analysis models the dynamic ways *(e)quality politics* works to creatively transform, or perniciously maintain, racially inequalitarian political orders *across* changing political conditions. And it reminds us that while many of the most dramatic acts of revolution and reaction have taken place at the schoolhouse door, sometimes the most durable resistance to equity and inclusion resides deep within the ivory tower.

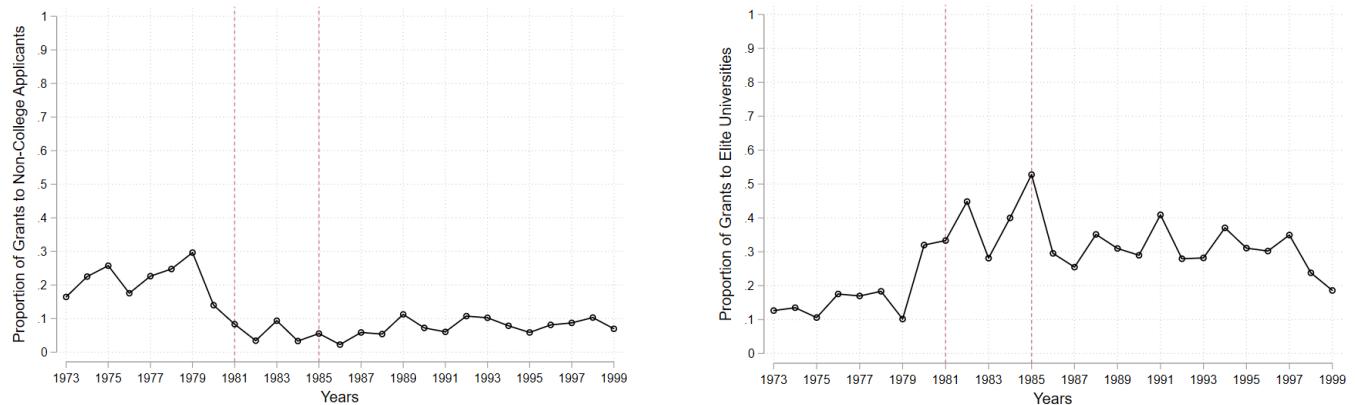
FIGURES

Figure 1: Priority Distribution of FIPSE's Annual Grant Guidelines 1973-1999



Note: The “system change” category represents priorities that emphasize the need to create sustainable and institutionalized solutions, but do not indicate a preference in terms of either “quality” or “equity.” This could include issues of “efficiency” or innovative uses of technology. The “Other” category, which only included “Teacher Education” in the pre-1986 period, grew to encompass a number of specific priorities including “Drug and Violence Prevention,” “International Education” cooperatives, and “Graduate Education” support.

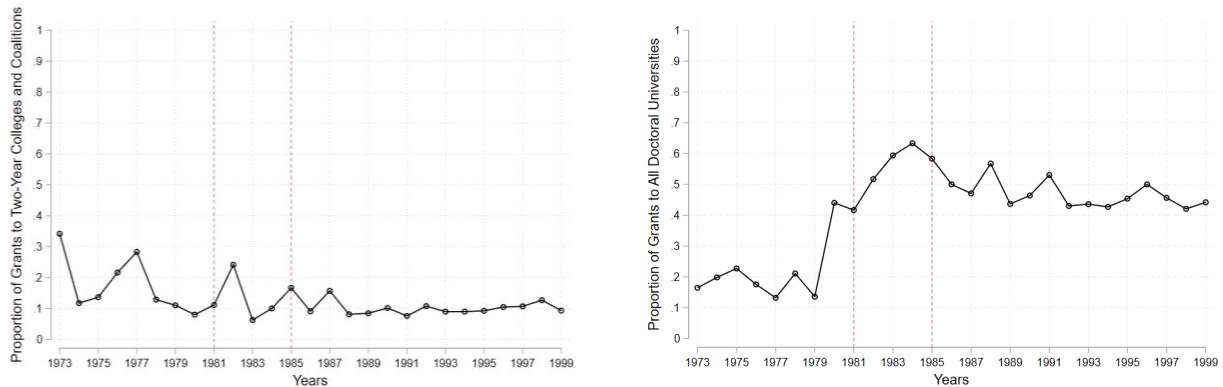
Figure 2a. Proportion of FIPSE Grants Awarded to Non-College* Applicants (left) by Year and to Elite Universities** (right) by Year



*Non-college applicants include any grantee that is not a college or university. This includes race-based coalitions, alternative education providers, research groups, and community-based organizations.

**Elite universities defined here as any college included as a U.S. News and World Reports Top 100 University *and/or* the designated “Flagship” state university.

Figure 2b. Proportion of FIPSE Grants Awarded to Two-Year Colleges and Consortia* by Year (left) and to Doctoral Universities by Year (right)



*All individual two-year colleges (both community colleges and private two-year trade schools) and consortia or collaboratives of such colleges are included in this category.

Data source: FIPSE Grants Database (U.S. Department of Education) and Integrated Postsecondary Education Data System (IPEDS). Coding and compilation conducted by the authors.

Figure 3. On top: FIPSE's 1976 Grant Priorities. Middle: FIPSE's 1984-85 Grant Priorities. On bottom: Department of Education's Proposed 1986 Grant Priorities for FIPSE.

FIPSE's 1984-85 Priorities	
Program Priorities: The following program priorities apply to the Comprehensive Program for Fiscal Year 1986.	
(1)	Learning important and difficult subjects and skills, including math, science, writing, foreign languages, reasoning, analysis and problem-solving.
(2)	Ensuring access to postsecondary education by improving course and program completion rates and by increasing and improving the articulation between high school and between two- and four-year colleges.
(3)	Providing education for a changing economy by providing educational programs and services for workers, unemployed individuals, businesses, and communities.
(4)	Understanding educational uses and implications of the new technologies, such as computers, television, and other electronic media.
(5)	Improving graduate and professional education by increasing access to postsecondary educational institutions at the graduate level and by reforming post-baccalaureate programs.
(6)	Enhancing teacher education and cooperation with the schools by developing teacher education programs, teacher in-service programs and cooperative programs between high school and colleges.
(7)	Strengthening organizational capacities to improving learning by enhancing institutional leadership and management, the abilities of faculty and other staff, and resources for incentives for improvement.
Under the Comprehensive Program competition, projects that do not address one of these priorities are also eligible for support if they address other significant problems in postsecondary education.	

1986 Priorities Proposed by the Secretary's office	
(1)	Renewal of the undergraduate curriculum based on a clearly articulated vision of the knowledge and skills an educated person should possess, and on the intellectual heritage of Western civilization.
(2)	Recognizing and rewarding outstanding undergraduate teaching through improved policies and procedures on hiring, promotion, and tenure.
(3)	Revitalization and reform of teacher education through efforts to: <ul style="list-style-type: none"> o expeditiously qualify for school-teaching able persons who have previously earned degrees in fields other than education and who are present lack pedagogical training; o strengthen the content, knowledge and expertise of current and prospective teachers in the subjects that they teach. o attract into and retain in the teaching profession persons of commitment and intellectual strength; and o ensure that persons preparing to teach have a solid grounding in basic disciplines of the liberal arts.
(4)	Designing approaches to preparing candidates for the Ph.D. degree that stress development of effective undergraduate teaching skills.
(5)	Raising the standards and expectations of academic performance for the bachelor's degree.
(6)	Strengthening the liberal arts education of students enrolled in undergraduate professional programs and graduate professional students.
(7)	Developing better means of appraising educational quality, assessing student learning and fostering excellence in postsecondary institutions of all kinds.
(8)	The design and introduction of cost-effective methods of instruction and operation.
(9)	Strengthening organizational capacities to improve learning by enhancing institutional leadership and management, the abilities of faculty and other staff, and resources for incentives for improvement.

Note. Guidelines were submitted with testimony at the House Committee on Education and Labor, Subcommittee on Postsecondary Education Hearings on September 6, 1985.