



2023

A Critical Policy Analysis of Kentucky School Districts' Trauma-Informed Education Plans

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Recommended Citation

Wells, Tommy; Taylor, Alexandra J.; and Lein, Amy (2023) "A Critical Policy Analysis of Kentucky School Districts' Trauma-Informed Education Plans," *Kentucky Teacher Education Journal: The Journal of the Teacher Education Division of the Kentucky Council for Exceptional Children*: Vol. 10: Iss. 2, Article 1.

DOI: <https://doi.org/10.61611/2995-5904.1050>

Available at: <https://digitalcommons.murraystate.edu/ktej/vol10/iss2/1>

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A Critical Policy Analysis of Kentucky School Districts' Trauma-Informed Education Plans

Abstract

The Commonwealth of Kentucky has taken its first steps in creating trauma-informed K-12 schools through passing the School Safety and Resiliency Act of 2019. School districts were tasked with developing trauma-informed education plans by July 2021. However, the Commonwealth's mandate gave broad autonomy to school districts in shaping their trauma-informed education plans' processes and content. Through a critical policy analysis design, this study examined the availability and quality of trauma-informed education plans from each school district in Kentucky and compared them to the trauma-informed framework developed by the National Child Traumatic Stress Network. Findings indicate that only 19 out of 171 school districts published their trauma-informed education plans publicly. Out of those 19, only three met all the criteria recommended by the National Child Traumatic Stress Network. There is a discussion of how a lack of state-level guidance impacts the quality of trauma-informed education plans followed by recommendations for improving these plans.

Keywords

trauma-informed practices, education policy, Kentucky school districts

A Critical Policy Analysis of Kentucky School Districts' Trauma-Informed Education Plans

Education policy is an integral part of governing public school districts in the United States, as these policies shape how school systems operate. While teacher quality and accountability have been central to education policy in the past (e.g., No Child Left Behind Act of 2001), equity is at the forefront of the Every Student Succeeds Act of 2015 (Cook-Harvey et al., 2016). Leading with equity as a critical value, school districts strive to implement relevant policies to support all students' success (Cardno, 2018). Cook-Harvey et al. (2016) define equity as the “policies and practices that provide every student access to an education focused on meaningful learning” where students are “taught by competent and caring educators who are able to attend to each child’s particular talents and needs” (p. 1). In the Commonwealth of Kentucky, equity in educational settings is being pursued through a policy that centers trauma-informed practices in K-12 schools, as having supportive educators who address students’ individual needs is part of a trauma-informed approach (Cole et al., 2013). By passing the School Safety and Resiliency Act of 2019, 158 K.R.S. § 4416 (2022), Kentucky tasked local school boards with creating district-level trauma-informed education plans by July 1, 2021. According to the School Safety and Resiliency Act of 2019, the minimum requirements of these trauma-informed education plans include the following:

- a. Enhancing trauma awareness throughout the school community.
- b. Conducting an assessment of the school climate, including but not limited to inclusiveness and respect for diversity.
- c. Developing trauma-informed discipline policies.
- d. Collaborating with the Department of Kentucky State Police, the local sheriff, and the local chief of police to create procedures for notification of trauma exposed students.
- e. Providing services and programs designed to reduce the negative impact of trauma, support critical learning, and foster a positive and safe school environment for every student. (p. 3)

Additionally, the Kentucky Department of Education notes that local boards of education can determine the format, goals, and procedures for their trauma-informed education plans, as well as create their own timelines for implementation and monitoring of their plans (Weeter, 2022). This autonomy to shape policies and procedures for trauma-informed education plans contrasts with stricter guidelines for other school-based plans in Kentucky. For example, Comprehensive School Improvement Plans and Comprehensive District Improvement Plans in Kentucky follow a prescribed format and planning process to identify needs, allocate resources, and monitor results (Swanson, 2022). While autonomy allows for flexibility for school districts to create trauma-informed education plans that meet the needs of their unique student population, it also has implications for equity in that some school districts may be better positioned than others in developing comprehensive plans. Therefore, this study examines the trauma-informed education plans that Kentucky school districts developed in terms of the school districts’ processes and content of their plans. This study is warranted to better understand how trauma-informed education is being implemented throughout the Commonwealth, and a comparison of all school districts’ trauma-informed plans allows stakeholders (e.g., policymakers, families,

educators) to determine how equitable plans are across school districts, identify potential gaps in planning, and determine what additional resources may be necessary.

K-12 Trauma-informed Practices

To examine Kentucky’s trauma-informed education plans, we first explore the literature of trauma and trauma-informed practices. Exposure to trauma can negatively impact student outcomes. Specifically, students exposed to trauma can experience social, emotional, and cognitive challenges (Raby et al., 2019; Thomas et al., 2019). In the school environment, these challenges from trauma exposure can adversely impact learning, including issues with self-regulation, executive functioning, language development, problem solving, sustained attention, and abstract reasoning (Blaustein & Kinniburgh, 2019). Scholars have explored steps to create a trauma-informed school, such as first building school staff’s trauma awareness (Cole et al., 2013); however, there is not an agreed upon trauma-informed school framework (Thomas et al., 2019), and there is varying expertise in trauma-informed practices among school staff (e.g., Wells, 2022). However, for this study, we adhere to conceptualizations and definitions of trauma-informed practices provided by the National Child Traumatic Stress Network (National Child Traumatic Stress Network [NCTSN], 2021) in part because this framework is referenced in the “What Is a Trauma-Informed School?” guide that is one of the resources provided in Kentucky’s Department of Education’s Trauma-informed Toolkit (Weeter, 2022) and because NCTSN’s framework offers district-wide guidance.

The National Child Traumatic Stress Network (NCTSN) defines a trauma-informed K-12 school system as “one in which all teachers school administrators, staff, students, families, and community members recognize and respond to the behavioral, emotional, relational, and academic impact of traumatic stress on those within the school system” (National Child Traumatic Stress Network, 2021, p. 2). This organization developed a system framework for school districts to use referred to as the *NCTSN System Framework for Trauma-Informed Schools*. Identified within the framework are ten Core Areas that are representative of a trauma-informed school system (Table 1).

Table 1

NCTSN (2021) Trauma-Informed Schools for Children in K-12: A System Framework

Core Area	
I	Identification and Assessment of Traumatic Stress
II	Prevention and Intervention Related to Traumatic Stress
III	Trauma Education and Awareness
IV	Partnerships with Students and Families
V	Creation of a Trauma-Informed Learning Environment
VI	Cultural Responsiveness
VII	Emergency Management/Crisis Response
VIII	Staff Self-Care and Secondary Traumatic Stress
IX	School Discipline Policies and Practices
X	Cross System Collaboration and Community Partnerships

The Core Areas included in the *NCTSN System Framework for Trauma-Informed Schools* are universal and applicable to all school systems and levels (i.e., elementary, middle, and high school) and provide focus areas that school systems can use to address organizational changes in becoming trauma-informed (National Child Traumatic Stress Network, 2021). Furthermore, “these core elements can also be useful to policymakers at the local, state, and federal levels in promoting policies that support trauma-informed schools” (p. 2). This framework provided the foundation for our understanding of trauma-informed practices and assisted us in our data collection and analysis in terms of how school district plans aligned with its recommendations.

The purpose of this study was to examine trauma-informed education plans in school districts across the Commonwealth of Kentucky. We hope to assess how well school districts implemented the Commonwealth’s mandate by addressing the following research questions: What are the availability and quality of trauma-informed education plans in school districts across Kentucky? Specifically, to what extent do the available trauma-informed education plans align with recommendations offered by the National Child Traumatic Stress Network?

Framework and Method

Critical Policy Analysis

There is no strict definition of critical policy analysis because of the many theories, approaches, and methods that can be used to assess educational policy issues (Diem et al., 2014). However, the goal of critical policy analysis is to facilitate “a deeper critique of the contextual nuances and complexities of the policy process” (Diem et al., 2014, p. 1076). Additionally, “critical policy researchers engage in critique, interrogate the policy process, and the epistemological roots of policy work, examine the players involved in the policy process, and reveal policy constructions” (Diem & Young, 2015, p. 841). Diem et al. (2014) further state that there are two essential aspects of critical policy analysis, including theoretical frameworks employed and purposes of the research. Specifically, those engaged in critical policy analysis often use multi-theoretical and interdisciplinary approaches that foster more breadth and depth in analyses (Diem et al., 2014). Moreover, there is an explicit connection from theory to methods, including how researchers’ perspectives influence what is discovered in the data and the themes that are developed (Young & Diem, 2018). Researchers can critically explore the politics surrounding policy creation, how the policy is distributed and given authority, and how a policy is received (Apple, 2019, pp. 280-281).

Theoretical Framework

The framework that guides our research is critical pragmatism. Those engaged in critical pragmatism are open to whether there is a problem that should be studied and to what might be a reasonable resolution to that problem (Feinberg, 2012). Moreover, in this approach, critical pragmatism holds that “sometimes experience that *should be* perceived as unsatisfactory is not recognized as problematic. This is most common where power is unequal, and where dominant interests control information and communication” (Feinberg, 2015, p. 150). Our goal is to “bring competing norms to the surface, to show how they impede experience and to encourage the formation of new ways to direct and enrich experience” (Feinberg, 2015, p. 151) through a critical pragmatist lens in our policy analysis. With a critical pragmatist lens, we seek to

understand whether there are any problems with Kentucky's trauma-informed education plans at both the state- and district-level, as well as offer any reasonable resolutions, through examining potential competing norms that are offered in the guidance from the School Safety and Resiliency Act of 2019 and the *NCTSN System Framework for Trauma-Informed Schools* (National Child Traumatic Stress Network, 2021).

Case Selection and Data Collection

In employing a critical pragmatist framework, as well as to develop analytical inferences, we employed criterion sampling for case selection using the following eligibility requirement: any school district in Kentucky that publicly posted policies or plans about trauma-informed education practices. We chose to review all school districts in Kentucky to determine whether there truly was a problem to address (Feinberg, 2012).

Document analysis served as our data collection method. Data sources included school district trauma-informed education plans that were publicly available as of August 2022, school board meeting minutes that discussed trauma-informed education plans, Kentucky Department of Education's website, and relevant state-level policies, including the School Safety and Resiliency Act of 2019, 158 K.R.S. § 4416 (2022), the School Safety and School Discipline, 158 K.R.S. §§ 440-470 (2022), and the Continuous Improvement Planning for Schools and Districts, 703 K.A.R. § 5:225 (2022). In the Commonwealth of Kentucky, there are 120 county school districts and 51 independent school districts that report to the Kentucky Department of Education, and each school district was required to develop a trauma-informed education plan. Therefore, we began data collection by conducting a search of all Kentucky school districts' websites ($n = 171$) to determine if a trauma-informed education plan was publicly available.

Our protocol consisted of first searching for school districts' websites. Once located, we started at the homepage of each website. If there was a search feature, we searched for the term 'trauma'. We also searched for discussions of trauma in school districts' school board meeting minutes and online policy/procedure manuals. If nothing resulted, we then reviewed Comprehensive School Improvement Plans, Comprehensive District Improvement Plans, American Rescue Plans, and Elementary and Secondary School Emergency Relief Plans for references to trauma. In our process of data collection, we tracked which trauma-informed education plans were available online, and if they were, we documented how these plans were published (e.g., within a trauma-informed education plan, within a broader district plan).

Data Analysis

Trauma-informed education plans were analyzed qualitatively through deductive content analysis (Elo et al., 2014). First, we developed a categorization matrix based on NCTSN's framework. Every trauma-informed education plan was reviewed for content and coded for its alignment to each of NCTSN's ten Core Areas (Polit & Beck, 2012). The coding process employed was descriptive coding (Saldaña, 2016), as this process aided in developing a categorized inventory and index of the data's content. To increase reliability among coders, we created an observation checklist to guide our coding of each trauma-informed education plan (Table 2).

Table 2
Observation Key Word Checklist

Core Area	Key Words
I	Identify, assess, screen, exposure, data, multi-tiered systems of support (MTSS)/response to intervention (RTI)
II	Prevent, intervention, refer, evidence-based, data
III	Educate, awareness, professional development, train, understand, impact
IV	Partners, students, families, parents/caregivers, systems, plan, trust, acceptance
V	Classroom, environment, social emotional learning, wellness, behavior program, positive behavior interventions and support (PBIS), modeling, practices
VI	Cultural responsiveness/relevant, diversity, equity, inclusion, individualized
VII	Emergency responses, crisis, safety, security, mitigation, preparation, threat
VIII	Self-care, secondary traumatic stress, wellness, well-being, support, strategies, recovery, resilience
IX	Discipline, behavior, consequences, prevention, safety, environment, restorative, PBIS, resources, policy
X	Collaboration, systems, community partners, programming, school-wide, district-wide, resources

Table 2 documents key words we searched for within each trauma-informed education plan. These key words were generated by NCTSN's definitions of each Core Area and our literature review, and this checklist served to improve the trustworthiness of our coding; specifically, it enhances conformability or objectivity by increasing the "congruence between two or more independent people about the data's accuracy, relevance, or meaning" (Elo et al., 2014, p. 2).

We then engaged in analytic memo writing to search for patterns and themes in the data to connect our coding to a more analytic review (Owen, 2014). Our memos focused on observations, reflections, unanswered questions, and future directions regarding school districts' trauma-informed education plans. We then consolidated our memos into agreed upon themes. Additionally, "scholars often use CPA to examine how policies contribute to educational disparities" (Sampson, 2019, p. 163). We discuss trauma-informed education plans by employing a lens of fundamental concerns that are a focus within critical policy analysis scholarship (Diem et al., 2014). For the purposes of our study, these include policy processes, roots, and development, as well as the distribution of power, resources, and knowledge (Diem et al., 2014).

Findings

Out of 171 school districts in Kentucky, only 19 (11.1%) had publicly available trauma-informed education plans as of August 2022. Twelve school districts published standalone trauma-informed education plans; seven school districts included components of trauma-informed initiatives within a broader district plan (e.g., American Rescue Plan, Elementary and Secondary School Emergency Relief Plan, Comprehensive School Improvement Plan). All school districts with publicly available plans included NCTSN's Core Area III, Trauma Education and Awareness ($n = 19$). Most school districts also included Core Area II, Prevention and Intervention ($n = 17$), Core Area V, Creation of a Trauma-informed Learning Environment

($n = 17$), and Core Area I, Identification and Assessment of Traumatic Stress ($n = 16$). The Core Area most excluded was VII, Emergency Management/Crisis Response ($n = 9$).

Table 3
Results of Trauma-informed Plan Analysis

District	Plan Type ^a	Act Req. ^b	I ^d	II	III	IV	V	VI	VII	VIII	IX	X
A	TIEP	Y	x	x	x	x	x	x	x	x	x	x
B	TIEP	Y	x	x	x	x	x	x	x	x	x	x
C	TIEP	Y	x	x	x	x	x	x	x	x	x	x
D	TIEP	Y	x	x	x		x	x	x	x	x	x
E	TIEP	Y	x	x	x	x	x	x	x		x	x
F	TIEP	Y	x	x	x	x	x	x	x		x	x
G	TIEP	Y		x	x	x	x	x	x		x	x
H	TIEP	Y	x	x	x	x	x	x			x	x
I	TIEP	Y	x	x	x	x	x	x			x	x
J	TIEP	Y		x	x		x	x	x	x	x	x
K	TIEP	Y	x	x	x		x	x	x		x	x
L	TIEP	Y	x		x	x	x	x			x	x
M	SR	N	x	x	x		x			x		x
N	ARP ESSER	N	x	x	x		x	x		x		
O	ARP	N	x	x	x		x	x		x		
P	ARP	N	x	x	x			x		x		
Q	ESSER	N	x	x	x					x		
R	ARP ESSER	N	x	x	x		x					
S	CSIP	N			x		x				x	

a. Plan Types: TIEP = Trauma Informed Education Plan; ARP = American Rescue Plan; ESSER = Elementary and Secondary School Emergency Relief; CSIP = Comprehensive School Improvement Plan; SR = Safe Return to In-Person Instruction and Continuity of Services Plan

b. Act Requirements = 5 trauma-informed strategies from the School Safety and Resiliency Act of 2019

c. NCTSN ten Core Areas

Two themes emerged from our document analysis and analytic memo writing: 1) varied availability and quality of trauma-informed plans and 2) lack of state-level guidance.

Varied availability and quality of trauma-informed plans

As part of the School Safety and Resilience Act of 2019, several statutes were put in place for Kentucky school districts, including the requirement that each local board of education must develop a district-wide, trauma-informed education plan by July 2021. There is not a national standard for what makes a trauma-informed school (Thomas et al., 2019); however, at a minimum, the School Safety and Resilience Act of 2019 required that school districts develop

trauma-informed education plans that included five minimum requirements. Some school districts used Kentucky Department of Education's guidance on developing trauma-informed schools, while other school districts had additional support and appear to have partnered with a local university to create more robust plans. However, no school district referenced the National Child Traumatic Stress Network as a resource within their plans.

In total, 19 out of 171 Kentucky school districts made their trauma-informed education plans publicly available as of August 2022. Twelve of the 19 school districts had trauma-informed education plans that were located through their websites. Each of these 12 plans specifically included the language about the five minimum requirements of the School Safety and Resilience Act of 2019. For the remaining seven districts of out these 19, we identified components of their trauma-informed education plans as part of a broader school/district plan. For example, one school district had trauma-informed components posted within one of its individual school's Comprehensive School Improvement Plan (CSIP; District S), one school district included components in its Safe Return to In-Person Instruction and Continuity of Services Plan (District M), two school districts included components in their American Rescue Plan (ARP) document (Districts O and P), one school district included components in its Elementary and Secondary School Emergency Relief (ESSER) plan (District Q), and two school districts included components in a plan labeled as both ARP & ESSER (Districts N and R).

Excluding the 19 school districts that published trauma-informed education plans, there were an additional seven school districts that mentioned a trauma-informed education plan within their school board meeting minutes ranging from May 2021 to July 2021. For three of these seven school districts, school board meeting minutes clearly noted that their trauma-informed education plan was approved by the board; however, we were unable to access the plans themselves. The meeting minutes for the remaining four of these seven school board meetings mentioned a staff member presenting the trauma-informed education plan and/or that plans were being considered; however, none of these school districts published their plans.

For the seven school districts that included components of their trauma-informed education plan within broader district plans (Districts S, M, N, O, P, Q, R), the language from the five minimum requirements of the School Safety and Resilience Act of 2019 was not included, nor was there any explicit reference to 158 K.R.S. § 416. Interestingly, there were two school districts' plans that directly cited a different part of 158 K.R.S. §§ 005-990. Specifically, these school districts referred to 158 K.R.S. §§ 4414-4415 to support their initiative to provide each school building with a School Resource Officer. These plans even included a link labeled as 158 K.R.S. §§ 4414-4415 that details all the sub-sections of 158 K.R.S., including 4416, but there was no discussion of the trauma-informed requirements.

The twelve school districts that had a standalone plan dedicated to trauma-informed education had a higher number of the NCTSN ten Core Areas than did the seven districts where the trauma-informed education plan was part of a broader document. Out of these twelve districts, three had plans that showed evidence of all ten Core Areas, three had evidence of nine, four had evidence of eight, and one addressed seven. The seven districts whose plans were part of a broader document only included between three and six of the Core Areas.

All 19 school districts described elements of trauma awareness, which is often cited as the first step in becoming a trauma-informed school (Cole et al., 2013). Some of the school districts attempt to create a trauma-informed learning environment (Core Area V), but no details are provided. For example, book studies are commonly cited, which could be inferred as generating discussions surrounding how to incorporate strategies into the learning environment,

but this is not explicitly stated in the text of the plan. Seventeen districts had evidence of Core Areas II (Prevention and Intervention Related to Traumatic Stress) and V (Creation of a Trauma-Informed Learning Environment). Sixteen school districts had evidence of Core Area I (Identification and Assessment of Traumatic Stress), and 15 had evidence of Core Area VI (Cultural Responsiveness). Both XI (School Discipline Policies and Practices) and X (Cross System Collaboration and Community Partnerships) were each included in 13 of the school districts' plans.

The Core Area most neglected was Emergency Management/Crisis Response, which may be surprising given the impact of COVID-19 and school shootings that have shaped the national conversation on school safety (Restrepo & Chang, 2022). Moreover, most community partnerships discussed were with law enforcement, as indicated in the School Safety and Resilience Act of 2019. A second weakness of these trauma-informed education plans was legitimate partnerships with families. NCTSN calls for full partnership with families and students to develop trauma-informed education plans – hearing their voices and incorporating their feedback in what support would be helpful to them. Finally, a third weakness was attending to staff self-care. To prevent burnout and secondary traumatic stress, staff well-being is an important consideration that many school districts neglected.

Lack of state-level guidance

From the variation in availability and quality of trauma-informed education plans, a closer examination of the School Safety and Resiliency Act of 2019 is warranted. For example, within the trauma-informed education plans, many school districts appeared to follow a template, though this template's origin is unknown. Within this template, certain elements appeared more frequently, including school district focus areas with goals and objectives, responsible personnel, relevant stakeholders, and projected timelines. Also, all school districts had accessible Comprehensive School Improvement Plans (CSIPs) or Comprehensive District Improvement Plans (CDIPs). However, only one of those, a CSIP, included even a partial trauma-informed education plan (District S), which was a Comprehensive School Improvement Plan for a middle school within the broader school district. Finding only the middle school CSIP raises the question of whether there is a trauma-informed education plan for the entire school district.

In Kentucky, schools and districts are required to publish their respective CSIPs and CDIPs to their websites according to 703 K.A.R. § 5:225, Continuous Improvement Planning for Schools and Districts (2022). However, no specific guidance is provided for trauma-informed education plans in 158 K.R.S. § 416, the School Safety and Resiliency Act of 2019. There are also specifications for Comprehensive School and District Improvement Plan processes outlined in 703 K.A.R. § 5:225 that indicate steps for needs assessments, data analyses, prioritization of needs, and development of goals, objectives, strategies, and activities. This level of specificity is not included regarding school districts' responsibilities for creating trauma-informed schools. Support for school districts to interpret the School Safety and Resiliency Act of 2019 is offered by the Kentucky Department of Education that has provided a toolkit of guidance documents. However, school districts are not required to use these guidance documents, nor does the Department of Education's toolkit specifically recommend that school districts align their work with that of NCTSN's recommendations. Instead, NCTSN is listed as one of many resources.

The School Safety and Resiliency Act of 2019 also contains a separate requirement that school districts hire school counselors or other school-based mental health services providers.

For example, it states the school counselor will be responsible for creating a trauma-informed team and leading trauma-informed approaches in each school. In contrast to the lack of reporting requirements for trauma-informed education plans, the School Safety and Resiliency Act of 2019 states that by November 1, 2022, school districts are to report the following:

The department the number of school-based mental health service providers, the position held, placement in the district, certification or licensure held, the source of funding for each position, a summary of the job duties and work undertaken by each school-based mental health service provider, and the approximate percent of time devoted to each duty over the course of the year. (p. 2)

The School Safety and Resiliency Act of 2019 includes more accountability measures for the hiring of personnel than it includes for implementing the five minimum requirements described for creating a trauma-informed environment. Moreover, it also places the responsibility for creating a trauma-informed team and leading these initiatives on a school counselor or mental-health services provider instead of as part of a school administrator's duties or purview.

Discussion

In light of our critical pragmatist approach, we posit that there is a "problem" with Kentucky school districts' trauma-informed education plans that might have a "reasonable resolution" (Feinberg, 2012). The identified problem is three-fold: 1) school districts overwhelmingly did not publish their trauma-informed education plans for the public to access, 2) for those school districts that made their plans available, only three met all the recommended Core Areas proffered by NCTSN's framework, and 3) state-level guidance on policy development and guidelines does not exist.

For school districts that did not publish their trauma-informed education plans, we view that decision as an effort to "control information and communication" (Feinberg, 2015, p. 150); however, reasons for this decision are unclear (e.g., school districts never created or did not finish developing trauma-informed education plans; school districts did not want to share their plans). Without publishing their trauma-informed education plans, stakeholders do not have the opportunity to review, debate, or otherwise engage with policies. As aforementioned, one of NCTSN's Core Areas includes collaborative partnerships with families and students to develop trauma-informed education plans. From the perspective of families or community members, communication of the school district's trauma-informed education plan, particularly while policies are still being developed, is essential to have stakeholders' voices heard to promote NCTSN's recommendation for collaborative partnerships.

The roots of school districts' trauma-informed education plan come from the Commonwealth's School Safety and Resiliency Act of 2019. Despite Kentucky's Department of Education referencing NCTSN's (2021) framework in their trauma-informed toolkit, the School Safety and Resiliency Act of 2019 itself requires five components that only partially align with NCTSN's recommendations. For example, one of NCTSN's Core Areas is Cross System Collaboration and Community Partnerships with goals that include improving health services, school discipline and attendance, and extra-curricular programming. However, the School Safety and Resiliency Act of 2019 only specified collaborating with State Police, the local sheriff, and

the local chief of police. In addition to partnerships with law enforcement, we may have expected to see school districts discuss partnering with mental health providers, social services, or healthcare providers, so that they could provide better wraparound services for students and families who have been exposed to trauma. Moreover, the partnerships with law enforcement did not clearly link how law enforcement could provide increased safety protocols for schools; instead, the focus was on notification of abuse and neglect. Finally, the twelve school districts with standalone trauma-informed education plans met the five minimum requirements of the School Safety and Resiliency Act of 2019, as well as included additional initiatives that reflected more of the Core Areas in NCTSN's framework.

Despite understanding the roots of school districts' trauma-informed education plans, school district processes for development are unclear. For example, only seven school districts had school board meeting minutes that included discussions about trauma-informed education. For the remainder of school districts, there currently is no public record to review any processes followed or personnel involved in creating trauma-informed education plans. Furthermore, the Commonwealth's School Safety and Resiliency Act of 2019 did not include guidance on processes to follow unlike with other directives, such as indicated for comprehensive school and district improvement plans. Whereas comprehensive school and district improvement plans are required to follow a prescribed format and planning, no such specifications are provided for trauma-informed education. It is left to each school district to determine its processes, policies, and procedures, which appears to have resulted in a high degree of variability in the availability and quality of trauma-informed education plans.

In terms of distribution of power, resources, and knowledge, the Commonwealth relinquished its power to school districts to navigate and develop trauma-informed approaches. However, the level of resources and expertise in trauma vary across each school district, as school districts have various levels of funding (Baumann, 2020). This disparity in funding can result in inequitable resources for school districts to employ when developing their trauma-informed education plans. The Commonwealth attempts to address a gap in trauma knowledge and expertise in its school districts by requiring, as part of the School Safety and Resiliency Act of 2019, that school districts hire a school counselor for each school building. The school counselor (or school-based mental health services provider) is then responsible for creating a trauma-informed team to identify and assist students who have been impacted by trauma, as well as provide training to administrators, teachers, and staff on trauma and trauma-informed practices. However, as found by Wells (2022), "school counselors received little training in trauma-informed practices during their graduate programs," and "few participants [school counselors] were confident about leading schoolwide training on trauma-informed practices" (p. 8). Therefore, simply hiring a school counselor, or other school-based mental health services provider, may not address the void of expertise or knowledge needed in trauma-informed practices.

There are reasonable solutions (Feinberg, 2012) to address the problems identified with Kentucky school districts' trauma-informed education plans. One solution that highlights and addresses a competing norm (Feinberg, 2015) is requiring school districts to publish their trauma-informed education plans on their websites, such as is required for CSIPs and CDIPs. This would be a first step in facilitating communication between the school district and community stakeholders. After establishing communication, families and students could then be invited to assist in developing trauma-informed education plans as collaborative partners (National Child Traumatic Stress Network, 2021). A second, more resource-intensive solution is

to require that school districts align their trauma-informed education plans to the Core Areas of NCTSN's framework. This may require additional resources in terms of personnel and instructional materials needed to fully implement strategies in all ten Core Areas. Here, a first step may be ensuring that the school counselors who are now required to be placed at each school receive specialized training in trauma-informed practices, so that they could then train faculty and staff at their schools. School counselors then could build their trauma team to help draft more comprehensive trauma-informed education plans that align with the National Child Traumatic Stress Network's framework.

Conclusion and Future Directions

School districts' trauma-informed education plans indicate that Kentucky is making strides in creating trauma-informed schools, but there is a lack of guidance from the Commonwealth that could foster more robust plans. Only three school districts out of 171 across Kentucky developed trauma-informed education plans covering all ten Core Areas outlined by NCTSN. Next steps include all school districts making their trauma-informed education plans publicly available, using the Kentucky Department of Education's resources and NCTSN's framework for guidance, and ensuring that school counselors or school-based mental health services providers are adequately trained to provide leadership in implementing trauma-informed practices in their schools and school districts. This study "illustrates how educational inequities can be reinforced by policy development and implementation" (Sampson, 2019, p. 175). From a critical policy analysis framework, the roots and development of trauma-informed education policies as well as the distribution of power, resources, and knowledge were revealing in how the Commonwealth gave school districts autonomy to develop their own trauma-informed education plans. However, without creating robust enough requirements comparable to those of other state-level directives, school districts developed plans with a high degree of variation in quality and availability.

Future research could investigate whether specific school characteristics are associated with whether school districts publicly posted their trauma-informed education plans and/or how detailed their trauma-informed education plans are, including a comparison of school districts by amount of school district funding levels, location of the district (e.g., rural, suburban, urban), socioeconomic status of the district, diversity in student population, and whether there are other equity initiatives in the district. Finally, future researchers could replicate this study over the next few years to determine if more school districts begin to publish their trauma-informed education plans publicly and if these plans begin to be more comprehensive.

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