Tracking: An Inherently Inequitable Practice

Tracking – the mere mention of the term around a group of educators is sure to elicit a heated debate. Urban, suburban, rural; elementary and high school; veteran or novice teacher: educators of every category have strong opinions about this practice. This paper will explore the definition and purpose of tracking in schools and will provide evidence of the inequitable nature of the practice. Articles from two leaders in education will be explored and will provide the context for an examination of tracking as a school organizational structure that re-segregates the student population and is inherently inequitable. While both authors agree on the definition and purpose of tracking, they arrive at very different conclusions in light of the impact of these programs. The analysis of their arguments will be used to further examine the practice of tracking and its interaction with education law, specifically the ruling in Brown v. Board of Education, and its goal of desegregation.

The juxtaposition of Maureen Hallinan’s Tracking from Theory to Practice with Jeannie Oakes’ More than Misplaced Technology, exemplifies what might be overheard during one of those “heated debates” mentioned previously. These two articles represent a synthesis of the collective arguments for and against the practice of tracking. Oakes, currently at the Ford Foundation and previously a professor at the University of California Los Angeles, authored the seminal critique on tracking: Keeping Track: How Schools Structure Inequality. Hallinan, a sociology professor at the University of Notre Dame, is an unabashed advocate of tracking as an effective and efficient organizational structure for schools.
I. Definition and Purpose of Tracking

Before weighing in on the subject of tracking, it is important to define the word as it relates to education practice. Hallinan defines tracking as “the practice of assigning students to instructional groups on the basis of ability.” Tracking is a practice at the school level where students are grouped into high, middle and low levels and attend classes designated for their specific track. Tracking is different than the commonly used term “ability grouping,” which can occur within a classroom. Ability grouping is often practiced within heterogeneous classes.

Relying on surveys and case studies, Hallinan explores both the practice of tracking and its effects. Oakes agrees with Hallinan’s definition and analysis of the effects of tracking. However, that is where the two authors’ agreement ends; Oakes dismantles Hallinan’s assertion that the negative consequences of tracking can be minimized by ensuring the fidelity of the selection criteria and by creating a nonracist school culture. An analysis of the impact of tracking on subgroups of students can be explored through the lens of law and policy.

According to Hallinan, the controversy surrounding tracking revolves around two areas: 1.) the effectiveness of the practice and 2.) issues of equity. In terms of effectiveness, she asserts that, “The intended purpose of tracking is to increase the effectiveness and efficiency of instruction.” These two ideas are not necessarily compatible, and in some cases can be in conflict. A practice can be efficient in terms of teacher effort, but that does not correspondingly make it the most effective method for improving students learning.

II. Effectiveness of Tracking

Proponents of tracking point to the benefit of homogeneous groupings, which can allow teachers to tailor instructional practices to the specific ability level of the “track.” The homogeneous groupings involved in tracking are defined strictly by the ability of the students in
the group. Hallinan, herself, undermines the notion that homogeneous groupings allow teachers to tailor instruction to the group’s ability when she concedes that cognitive development is uneven. Given that biological fact, the term “homogeneous groupings” then becomes a misnomer. The group will naturally devolve into heterogeneous grouping and can only be considered “homogeneous” at inception. In addition to the issue of uneven cognitive development, there is strong evidence to suggest that students have differing instructional methodological needs. The differences are based on learning style needs, rather than the ability of the students. Homogeneous ability tracking does not necessarily equate to homogeneous groupings of learning styles. Because of the variety of learning styles, differentiated instruction is equally important in tracked groups and untracked groups. This variety brings into question whether a group can ever truly be called “homogeneous,” if the only criteria used to determine such categorization is student ability. Even if one were to factor for learning style and ability, the homogenous group would only be similar at the point of formation, but become less so over time.

Hallinan dissects the criticism of homogenous grouping through an exploration of the issue surrounding selection criteria. She asserts that “ability” is broader than test scores, and that multiple factors should be examined to determine the appropriate track for each student. She agrees with proponents of tracking that argue that multiple factors should be utilized in determining “ability.” Hallinan is clear that assignment to tracks should be based solely on academic factors, such as test scores, grades, previous coursework, teacher recommendations, etc. She points to what she believes is the fatal flaw in most tracking designs: students are often tracked based on additional, non-academic factors, such as scheduling conflicts, teacher availability, extra-curricular activities, etc. Including non-academic and subjective factors in the
decision, leads to what Hallinan describes as a lack of standardization in terms of what constituted a high, middle, or low track. Therefore she concedes there is great discrepancy within and among schools in terms of the various factors they used to determine assignments to a particular track, and in how or when a student might be able to move between tracks. This leads to tracked heterogeneous groups with great overlap in abilities between tracks, which bring into question the effectiveness of a practice with such weak internal validity.

Hallinan’s argument in favor of tracking is further undermined by her conflicting views around the importance of maintaining the homogeneous nature of the groupings. First she states that only academic factors should be considered to ensure that tracks are truly homogeneous. She then asserts that ability groups should be flexible enough to allow frequent moving between tracks. Given the recommendation that schools use both standardized test scores and course prerequisites as criteria for selection to specific tracks, transfers could only happen on an annual basis. Alternately, in order to allow for frequent transfers, the system would have to rely on non-academic criteria, or subjective criteria (i.e. grades and recommendation) to allow for the type of flexibility she suggests. Relying on subjective or non-academic criteria, she has previously argued would likely lead to a less effective, heterogeneous track. Further, one could argue that frequent movement between tracks has the real potential to undermine the benefits of a cohesive and scaffolded approach to curriculum. Not to mention that it completely ignores the social and emotional needs of the student. It would require students to continually regroup and to reform systems of support within their new track. The detrimental impact of this type of disruption and the actual reduction of efficiency created by such a system seems likely to outweigh any projected benefit.
This inability to factor for all variables that would contribute to purely homogenous groupings brings into questions whether the fidelity of the model can be maintained, even in the short term. While the concept of tracking may be appealing to educators who struggle with the diverse ability levels encountered in the average public school classroom, theory divorced from practice cannot be expected to result in consistently positive outcomes. For example, the political and economic philosophy of Karl Marx provides an admirable theoretical base for the foundation of a governmental structure. However, implementation of the theory has proven to be more than difficult given the numerous conflicting elements within a given society. Most governments that have attempted to adopt a Marxist-based government (communist or socialist) ultimately corrupt the model when faced with conflicting contextual elements that were not adequately factored into the original theoretical framework.

III. Equity Issues Involved with Tracking

The second area of controversy with tracking, identified by Hallinan, deals with the issue of equity. This is the area in which Oakes concentrates her argument against tracking and the one in which there is the clearest legal argument to be made against tracking. Hallinan concedes that “low ability is related to race, ethnicity, and socioeconomic status and that tracking discriminates against students in these demographic categories.” She is unambiguous about her acknowledgement that tracking largely segregates minority and low-income students to the lower track. However, Hallinan dismisses the idea that segregation alone should be applied as a rationale for abandoning the practice. She asserts that the negative impact of segregation in a tracked system can be minimized by integrating non-tracked classes and school activities within the school building.
Oakes strongly disagrees with Hallinan, both on the effectiveness and the equity arguments. She disputes Hallinan’s argument that most of the negative consequences of tracking are due to the technical issues in implementation that undermine the fidelity of the model. Oakes asserts, “Most educators cannot imagine tracking as a technical, neutral organizational practice that is unrelated to personal, societal, or vocational purposes.” With that one sentence, Oakes minimizes any discussion about tweaking the implementation of tracking for better outcomes, and zeros in on the essential and the most important argument against tracking: that it is inherently inequitable.

But, let’s explore the technical argument first. Oakes takes issue with the remedies that Hallinan proposed to mitigate the negative impact of tracking because they are erroneously built on the presupposition that schools operate in a vacuum and are not influenced or impacted by the social and political influences of the larger society. Hallinan claims that the negative consequences of segregation can be minimized by creating a school culture that is nonracist, and that the lack of motivation frequently exhibited by lower track students can be improved through a more comprehensive rewards system. Oakes strikes down that belief. “Few students miss the clear status message carried by racially identifiable tracking in high-status academic classes. Even if non-tracked classes and extracurricular activities are more evenly mixed racially, students and adults have their stereotypes and prejudices reinforced by racially identifiable high- and low-track classes.” This echoes the 1954 U.S. Supreme Court decision in Brown v. Board of Education. That ruling made clear that segregation has a negative impact on minority students and that “the impact is greater when it has the sanction of the law for the policy of separating the races is usually interpreted as denoting the inferiority of the Negro group. A sense of inferiority
affects the motivation of a child to learn."\textsuperscript{xiv} In this case, the "sanction of law" is the practice of tracking established by school policy.

Oakes also discounts Hallinan’s reward strategy to improve students’ perception of lower-track status. Oakes doubts that a robust reward system would be able to overcome student’s “accurate perceptions that schools have a low regard for their abilities and prospects for success in schools."\textsuperscript{xv} Students are not empty vessels, nor do most compartmentalize their lives in such a way that allows societal norms and values to be kept separate from their school experience.

It isn’t just the students and the school community that understand the lifelong consequences of tracking. Oakes points out that parents with high socioeconomic status routinely use their social and political capital to ensure their children secure positions in the upper track, regardless of whether or not they are objectively qualified to be there. This certainly mirrors Annette Lareau’s research on social class and parental involvement in education. She examines the role of social capital in schools and asserts that high- and middle-income parents’ intervention on behalf of their underperforming children results in lower retention and higher promotion rates for those students.\textsuperscript{xvi} Essentially, her research supports the argument that the privileged class benefits disproportionately and the underclass is disproportionately burdened by tracking.

Hallinan applies a structural functional analysis of tracking, highlighting negative consequences only as the result of flawed implementation efforts. Oakes, on the other hand, argues that tracking can never be an appropriate approach to education because it is founded in institutional racism which is a reflection of society, and that no amount of operational tweaking will change that fact. She attacks tracking from both a structural and a conflict theory
perspective. Oakes is strongest with her argument that the inherently inequitable nature of tracking serves solely to preserve the status quo and primarily benefits those already in the privileged class. It is not enough to minimize the negative consequences of tracking when nothing short of eliminating the inequity should be acceptable. She also dismantles the structural remedies that Hallinan recommends on the grounds that they ignore the political, social, and power dynamics of society that are mirrored in schools. Specifically she points to research that shows that students in lower tracks do not have access to high quality curriculum, teachers or engaged learning environments.xvii

IV. Tracking in the Post-Brown Era

Educators acknowledge, and research confirms that there is a causal relationship between a student’s race and socio-economic status and their scores on standardized tests. And that as a group, low income and minority students score lower than white students on standardized tests.xviii While race is not a specific criteria used for homogeneous grouping for tracking purposes, the use of standardized test scores results in a re-segregation of races within a school. The lowest track inevitably represents a disproportional percentage of poor and minority students.xix

In the 1954 ruling on Brown v. Board, Chief Justice Warren delivered the unanimous opinion of the U.S. Supreme Court. He asserted, “We conclude that in the field of public education, the doctrine of ‘separate but equal’ has no place….segregation is a denial of the equal protection of the laws [guaranteed by the Fourteenth Amendment.]”xx Although the decision was written to address the inequities presented at that time – that of segregation within school districts, one can hardly believe that the Court’s decision was meant to simply desegregate the district but allow for continued segregation at the building level. Today, even while many school
districts throughout the country have reached Unitary Status, the issue of segregation within school buildings remains, and the practice of tracking exacerbates the problem. The decision in Brown asserted that “separate but equal,” established by Plessy v. Ferguson, has no place in K-12 education. Further, the Court stated that equality is determined by both tangible and intangible elements of schooling.\(^{xxi}\)

In fact, the Brown decision not only expressly defines the equitable elements the Court viewed as basic essentials to the learning environment, it goes further by claiming that there are “intangible” elements that must be addressed as well. Specific tangible elements mentioned include buildings, curricula, and qualifications of teachers. But the court further explores the elements of a quality education by dissecting the arguments in Sweatt v. Painter and McLaurin v. Oklahoma State Regents. In Sweatt, the Court looked at “those qualities which are incapable of objective measurement but which make for greatness in law school.”\(^{xxii}\) And in applying McLaurin, Warren points out that the Court also considered intangible considerations, such as a student’s “…ability to study, to engage in discussions and exchange views with other students, and in general, to learn his profession.”\(^{xxiii}\) In Brown, the Court makes abundantly clear that, while it applied rationale from cases that involved institutions of higher education in its consideration, both the tangible and intangible elements explored in those cases are even more important in K-12 schools. To that end, Warren writes, “Such considerations apply with added force to children in grade and high schools.”\(^{xxiv}\)

The practice of tracking violates the spirit if not the letter of the law established by Brown. It fails upon examination of both the tangible and intangible elements of education. The tangible element of teacher quality has been shown to be inequitably distributed in tracked school, with highly qualified and experienced teachers being placed disproportionately in the high track
classes, and inexperienced and alternative-route certified teachers disproportionally assigned to the lower track. And, of course, the curricula between tracks are purposefully unequal. As for the intangible qualities, if tracked students within a school only interact in non-academic arenas, one must consider to what extent lower-tracked students will have to engage upper-tracked students in dialogue likely to improve their understanding of material or each other’s points of view?

Tracking, as defined in this article and practiced in public schools today, is of great significance for society. The inequitable distribution of quality educational opportunities has lifelong consequences for both the individual and the communities in which they live. Chief Justice Warren examined the role of education in society and the issue of access to quality educational opportunities:

“…education is perhaps the most important function of state and local government….It is doubtful that any child may reasonably be expected to succeed in life if he is denied the opportunity of an education. Such an opportunity, where the state has undertaken to provide it, is a right which must be made available to all on equal terms.”

Today, criticism of the Court’s decision in Brown has mostly centered on its inability to create meaningful change for minority students. While it is important to recognize that “the Warren court was making a decision about race in the context of racism,” it is also important to acknowledge that in the following 56 years since Brown was decided, there remains a great deal of work to do in order to provide equal access to high quality educational opportunities for all students. Tracking is an example of the shortcomings of efforts made toward that goal in the post-Brown era.

Once could certainly argue that the Court failed to make a case against segregation because it harms all children. The Court’s deficit approach, narrowly focused on the “Negro”
student, can be seen in its assertion that segregation “generates a feeling of inferiority as to their status in the community that may affect their hearts and minds in a way unlikely ever to be undone.” While tragic in many ways, that statement expressed why segregation is bad for minority students, but did not drive home the point that segregation is bad for all students.

Research supports this concept, and has established that segregation is harmful to all students because it clouds future dialogue among the races and stunts a student’s world view. Education in desegregated schools has been shown to enhance student learning, assists in the examination of closely held beliefs, and cultivates an understanding of multiple perspectives, which leads to improved critical thinking skills. The Court touched upon the idea that segregation has a negative impact on all students. But the language was couched in such a way that made it easy for the reader to assume that the idea of quality education being “denied” was applicable only to the minority student. Specifically, “Today it [education] is a principal instrument in awakening the child to cultural values, in preparing him for later professional training, and in helping him to adjust normally to his environment.” The idea behind that statement is even more applicable today in this era of ever-increasing globalization. That statement applies to students of all races and should resonate with parents of white students as well as minority students. It begs the question: How can schools that maintain a system of tracking claim that they are preparing students for the global marketplace, when what they are really doing is hampering students’ ability to function in the 21st century by limiting their worldview and stunting their exposure to a variety of perspectives.

May 17th, 2010 was the 56th anniversary of the Brown v. Board decision. U.S. Secretary of Education, Arne Duncan, gave a speech in Washington, D.C. where he stated,
"Today, on the 56th anniversary of the landmark Brown v. Board of Education, we celebrate the progress we have made to bring educational equity to millions of American students. But we also honor the sacrifice of all those who fought for equality by recognizing that, for all of our progress, we still have further to go. We reaffirm our collective commitment to providing a high quality education to all children regardless of race or background so they can succeed in college and careers and prosper in life. Education is the civil rights issue of our time. President Obama and I remain deeply committed to reforming schools so that all children receive the world-class education they deserve."

The “high quality education” referred to in that speech cannot possibly be the one offered to students in the lowest level of a tracking system. While proponents of tracking have asserted that the practice is not specifically targeted against minority students, the truth remains that poor and minority students consistently make up the lowest level of a tracked system. And, that reality supersedes the meritocratic intent of the practice of tracking. Education reformer, Linda Darling-Hammond wrote,

“Despite the rhetoric of American Equality, the school experience of African American and other ‘minority’ students in the United States continue to be substantially separate and unequal. Dramatically different learning opportunities – especially disparities in access to well-qualified teachers, high quality curriculum, and small schools and classes – are strongly related to differences in student achievement. … The result of this collision of new standards with old inequities is less access to education for many students of color, rather than more.”

It is impossible to disconnect the technical aspects of tracking from the reality that it re-segregates students and disproportionally burdens poor and minority students, with lifelong consequences.

V. Other Implications for Tracking

As a former urban school administrator, I have witnessed the intentional inequitable distribution of resources at the state, district and school level. Archaic funding structures for education prevent equitable distribution of funds between districts. Nothing short of a complete
overhaul of the tax structure will remedy that issue. However, I believe that school administrators have both a legal and moral obligation to eliminate the process of tracking as it is inherently unequal and causes great harm to our future. Our society is being robbed of its best and brightest as an artificial structure has been put in place that limits a large percentage of students from receiving the quality educational elements they need to thrive. As Darling-Hammond states, “outcomes for students of color are much more a function of their unequal access to key educational resources, including skilled teachers and quality curriculum, then they are of race.”³³xiv How many brilliant artists, politicians, business leaders, etc. have not reached the heights they might have in life, if not for the lack of cultivation of their talents and abilities? It is society as a whole that suffers. Not just minority populations, but all populations are robbed of the benefits these potential contributors could have made. De-tracking is essential to any effort to provide equitable distribution of these key resources.

While the decision in Brown was designed to address racial inequity, race is only one part of the equation when discussing the impact of tracking. In addition to minorities, there are other sub segments of the student population that are also vulnerable to the negative impact of tracking. According to the U.S. Department of Education, over 6.5 million children in this country receive special education services.³³xv In addition, nationally, nearly 4 million children are provided with English Language Learner services,³³xvi and over 800,000 students in America are classified as homeless³³xvii. Tracking runs contrary to the concept of inclusion and would further marginalize millions of students that, by definition, would fall into the lowest track, with little hope of ever moving up. More attention must be paid by our policymakers to the impact of structures like tracking on our most vulnerable populations.
If our society truly believes, as Horace Mann asserted more than 160 years ago, that “education is great equalizer,” then we owe it to all children to provide them with a quality educational experience. Civil rights pioneer, W.E.B. Du Bois spoke eloquently about the need for equal access to education. He drove home the point that access to education for all students is essential, not just for minorities, but for the good of society.

“Of all the civil rights for which the world has struggled and fought for 5000 years, the right to learn is undoubtedly the most fundamental – the freedom to learn has been bought by bitter sacrifice. And whatever we may think of the curtailment of other civil rights, we should fight to the last ditch to keep open the right to learn, the right to have examined in our schools not only what we believe, but what we do not believe; not only what our leaders say, but what the leaders of other groups and nations, and the leaders of other centuries have said. We must insist upon this to give our children the fairness of a start which will equip them with such an array of facts and such an attitude toward truth that they can have a real chance to judge what the world is and what its greater minds have thought it might be.”

In order to provide full access to quality education for every student, we must insist that our schools de-track. Discontinuing the practice of tracking, as Oakes points out, would be “an extraordinary reform to undertake.” Clearly this reform would need to coincide with a concerted effort toward ensuring that every class is led by a high-quality teacher. Greater effort must be placed on improving teacher training programs that foster strong differentiated instructional practices, so that every student will thrive in non-tracked, heterogeneous classes and schools. Just because a reform is difficult does not mean it should not be attempted. Like most things in life, if it was easy it would have been done by now. This year marks the 56th anniversary of the Brown v. Board decision. Discontinuing tracking in our schools would continue the progress toward providing equality of opportunity in education, which was the ultimate goal of that groundbreaking case. The time is now to ban the practice of tracking.


iii Ibid.


vii Ibid.


xiii Ibid. p. 320


Ibid.


xxviii Ibid. p. 5.


xxxiv Ibid. p. 214.


