Policy implementation through multilevel governance: Top-down and bottom-up approaches of mandated participatory planning for school improvement

Jordyn E. Green Ph.D. Candidate University of Nevada, Reno jordyng@unr.edu

Abstract

In December of 2015, the Elementary and Secondary Education Act was reauthorized as the Every Student Succeeds Act (ESSA), replacing the highly controversial No Child Left Behind as the U.S.'s major education policy. Under ESSA, the lowest performing schools are identified using data from statewide accountability systems to participate in school improvement processes. State education agencies (SEAs), school districts, schools, and other local stakeholders are then tasked with collaboratively developing and implementing school improvement plans using research-based evidence and data from the accountability system. This mandatory collaborative planning process exemplifies a multilevel policy implementation approach known as mandated participatory planning (MPP; Newig & Koontz, 2014). MPP integrates theories of multilevel governance, participatory governance, and nested policy cycles, and it requires the collaborative formation of implementation plans at subnational levels. However, there is variation in how these planning processes are structured, specifically regarding the degree to which these processes are centralized at the state-level. Through a comparative case study of school improvement processes in two U.S. states, this project will investigate how the structure of MPP processes impacts interorganizational coordination (IOC). Data will be collected through content analysis of policies and improvement plans and semi-structured interviews with state personnel. The findings suggest that while SEAs use similar types of coordination tools, the implementation structure used by the state impacts the level of IOC achieved.

Prepared for Presentation at the Western Political Science Association Conference March 10-12, 2022 in Portland, Oregon

Introduction

Addressing complex social problems is the primary objective of most governments. The causes of these problems are often multifaceted, cross-cutting, and interconnected with other social issues (Weber & Khademian, 2008), which suggests that solving them will require integrated policy efforts from different agencies and organizations across multiple levels of government. However, in practice, government action is often fragmented across policies and multiple organizations (Peters, 2015). A promising strategy to mitigate the negative consequences of government fragmentation and promote policy integration is interorganizational coordination (IOC), defined as a continuous process of information exchange, knowledge sharing, and joint decision-making between individuals and organizations (Cejudo & Michel, 2017; Margerum, 2011). While previous research demonstrates the potential benefits of IOC, there is limited research examining how implementation structure impacts the types of coordination tools that are used, and the level of IOC achieved.

In the education policy domain, IOC is of particular importance during school improvement processes, which aim to enhance student outcomes, improve learning conditions, develop the skills and competencies of educators and administrators, and strengthen school capacity for managing change (Harris, 2002; Hopkins, Ainscow, & West, 1994; Murphy, 2013). School improvement is inherently a systemwide effort—individual schools are nested within a larger education system comprised of multiple levels of governance, community organizations, and external stakeholders (Darling-Hammond, Wilhoit, & Pittenger, 2014; Finnigan & Daly, 2012; Honig, 2006; Murphy & Datnow, 2003). Despite this, prior attempts at school improvement, including those implemented under No Child Left Behind (NCLB), failed to acknowledge the organizational interdependence within the education system and instead

established an escalating series of highly punitive sanctions and corrective actions primarily *for schools*. These policies fragmented school improvement efforts from broader education reform efforts, failed to improve performance in most low achieving schools, and eroded social dynamics within education systems and communities more broadly.

In contrast, the Every Student Succeeds Act (ESSA), passed in 2015 to replace NCLB, was designed to support systemwide improvement efforts by distributing performance responsibility and accountability across multiple levels within the education system and by engaging multiple levels of governance and external stakeholders in the planning and implementation processes (Adams, Ford, & Forsyth, 2017; CCSSO, 2017). Under ESSA, low performing schools are identified using data from statewide accountability systems to participate in school improvement processes. State education agencies (SEAs), school districts, schools, and other local stakeholders are then tasked with collaboratively developing and implementing school improvement plans using research-based evidence and data from the accountability system. ESSA is an opportunity for SEAs to restructure school improvement processes to cultivate high levels of IOC to support the improvement of low performing schools (CCSSO, 2017; Cook-Harvey, Darling-Hammond, Lam, Mercer, & Roc, 2016).

The school improvement process prescribed by ESSA exemplifies a multilevel policy implementation approach known as mandated participatory planning (MPP; Newig & Koontz, 2014). MPP integrates theories of multilevel governance, participatory governance, and nested policy cycles, and it requires the collaborative formation of implementation plans at subnational levels. During these collaborative processes, administrators at multiple levels of governance are required to engage local stakeholders in policy planning cycles. These planning cycles require participants to assess the current conditions using local data, define the policy problem, specify goals and subgoals, develop concrete measures to monitor performance, and formulate explicit plans for improvement. Following the implementation of these plans, systematic evaluation is conducted to adapt the problem definition and revise the plan. This secondary policy cycle gives local administrators the authority to make policy design decisions during implementation processes. When done well, MPP is expected to increase IOC in multilevel governance systems (Koontz & Newig, 2014; Newig & Koontz, 2014); however, research deliberately examining IOC during MPP processes is limited. This research will address this gap by identifying the specific coordination tools that emerge from MPP processes and analyzing how these tools contribute to IOC across levels of governance.

This research builds on existing scholarship and contributes to the literature in three ways. First, extant research on IOC utilizes diverse theories and approaches, which has resulted in conceptual fragmentation (see Trein et al., 2021). This research will attempt to link multiple conceptualizations of IOC to understand the relationship between organizational structure and level of coordination. To do this, IOC will be examined in two cases to compare how different organizational structures perform in different contexts. Second, this research will test the claim that MPP increases IOC by examining the specific coordination tools that emerge from school improvement processes and whether they increase IOC. Third, by examining IOC during school improvement processes, this research offers insight into the implementation of these complex processes as well as the state and school district roles in facilitating them, contributing to a surprisingly sparse body of research in the educational policy domain.

This paper proceeds as follows. I begin by introducing scholarship on policy implementation in multilevel governance systems and discuss the critical role of IOC during these processes. Next, I describe the research objectives, the guiding research questions, and

research context. Subsequently, I explain the research design, including a description of the case selection methodology and the data collection methods, which include document analysis and interviews. Finally, my analysis demonstrates that SEAs use similar types of coordination tools; however, the implementation structure used by the state impacts the level of IOC achieved. In a centralized, top-down context, IOC is facilitated by the formalization of rules and responsibilities, which creates clarity around goals and values, enables power sharing, and promotes shared accountability, but may be too restrictive and impractical in practice. In a decentralized, bottom-up context, IOC is impeded by a lack of authority at the state-level to formalize roles and responsibilities, which produces a lack of shared understandings of the overarching school improvement process, its goals and objectives, and individual and organizational roles during the process, but allows for more targeted support based on locally identified needs.

Literature Review

Policy Implementation in Multilevel Governance Systems

IOC is a critical component of policy implementation in multilevel governance systems. Multilevel governance refers to a system of governance where legitimate decision-making authority is shared across nested levels of government in multiple territorial jurisdictions (Hooghe & Marks, 2003). This devolution of authority from a single central government to multiple centers of decision-making creates regional and local autonomy that enables more efficient and flexible governance. Within this structure, centralized governments can exploit economies of scale and internalize policy externalities, while decentralized governments can accommodate diversity in local context and citizens' preferences (Benson & Jordan, 2010; Ostrom, Tiebout, & Warren, 1961). An effective multilevel governance system will adjust the level of governance for specific tasks to accommodate the trade-offs of centralization (Alesina & Spolaore, 1997; Marks & Hooghe, 2000). Therefore, multilevel governance systems can be optimally designed to maximize efficiency and flexibility in public service delivery.

However, research indicates that when policy implementation efforts involve multiple organizations at different levels of governance, the implementation process becomes much more challenging and complex (O'Toole, 2011; Pressman & Wildavsky, 1973). In these systems, institutionally prescribed, formal powers are often overlapping, concurrent, or ambiguous, which creates high levels of vertical interdependence and requires some degree of integration and coordination (Kay, 2017). Research has demonstrated that several characteristics of multilevel systems act as barriers to policy implementation. First, multilevel systems have been conceptualized as a series of "clearance points" that reduce the likelihood of successful implementation by delaying implementation and altering the intended policy design (Pressman & Wildavsky, 1973). Second, multilevel systems are often comprised of heterogeneous populations with diverse preferences, so achieving consensus on policy problems is a challenge (Milio, 2010). Third, policy actors from different organizations may have different goals or preferred means of achieving those goals, so achieving consensus on potential solutions is also a challenge (May & Winter, 2009).

While multilevel systems have traditionally been considered to be a barrier to effective policy implementation, research originating from the polycentric governance tradition suggests that these systems may actually facilitate and enhance policy implementation (Gollata & Newig, 2017; Ostrom, 1999; Thomann & Zhelyazkova, 2017). Consequently, scholars argue that multilevel governance may enhance policy implementation in several ways (Gollata & Newig, 2017). First, decentralization provides local policy actors with an opportunity to make decisions

that utilize local knowledge, accommodate local conditions, and are informed by local preferences to create more targeted and effective public policy (Newig & Fritsch, 2009). Second, decentralization enables participation of nonstate actors in governance processes, which increases the use of local knowledge in decision-making and improves stakeholder buy-in and commitment to policy implementation (Brody, Godschalk, & Burby, 2003; Newig & Koontz, 2014). Third, in multilevel governance systems, it is possible to adjust the level of governance responsible for specific functions to determine the optimal level that maximizes efficiency and flexibility during policy implementation. This determination is often based on economies of scale, efficient resource distribution, and the degree of authority allotted to different levels within the system (Alesina & Spolaore, 1997; Benson & Jordan, 2010; Marks & Hooghe, 2000; Young, 2002). Understanding how to structure the implementation of policies is critical for overcoming the barriers to policy implementation described above and capitalizing on the potential advantages of governance in multilevel systems.

Interorganizational Coordination

One way to improve policy implementation in a multilevel governance system is to enhance IOC, both vertically across levels of governance as well as horizontally among different territorial jurisdictions (Newig & Koontz, 2014). IOC is a continuous process of information exchange, knowledge sharing, and joint decision-making between individuals and organizations (Margerum, 2011). Vertical coordination involves interactions among levels of government (Peters & Pierre, 2001). Higher levels of government often utilize lower levels for policy implementation because lower levels can more effectively engage local stakeholders in the policy making process and can design more detailed and targeted policies (Hardy & Koontz, 2008), whereas lower levels of government implement policy and acquire information about the

efficacy of the policy in achieving desired outcomes, the unintended consequences of design decisions, and any resource deficiencies. Vertical coordination ensures that this information feeds back to influence decision-making at higher levels of government, which can help create responsive and legitimate governance systems (Hooghe et al., 2020; Koontz & Newig, 2014). Horizontal coordination involves interactions among neighboring jurisdictions that share the same degree of decision-making authority and do not have hierarchical control over one another (Newig & Koontz, 2014). Horizontal coordination can eliminate the silos that contribute to government fragmentation and facilitate information sharing and learning across territorial jurisdictions (Agranoff & McGuire, 2003; Kraak, 2011).

Levels of Interorganizational Coordination

IOC consists of three interrelated elements: roles and responsibilities, communication and information exchange, and conflict resolution and decision-making procedures (Cejudo & Michel, 2017; Margerum, 2011). First, coordination involves well defined roles and responsibilities that specify how participating individuals and organizations should interact and what functions and activities should be executed and enforced (Lie, 2011; Streeter, Sherraden, Gillespie, & Zakour, 1986). Second, coordination requires communication and information exchange that allows individuals and organizations to create more comprehensive interpretations of the policy issues, develop shared understandings of the goals and objectives of policies, and codetermine solutions to policy problems (Dawes, 1996). Third, coordination involves conflict resolution and decision-making procedures that allow diverse participants to mediate conflicts and resolve differences to reach consensus (Mattesich, Murray-Close, & Monsey, 2001).

Based on the extent to which these elements are present, different levels of IOC can be achieved (Cejudo & Michel, 2017; Metcalfe, 1994). For example, Cejudo and Michels (2017)

developed a scale of coordination consisting of three levels ranging from minimal coordination to high coordination. Level one describes coordinated information exchange aimed at supporting individual organizations to achieve their own internally established goals and priorities. Level two describes formally coordinated information exchange to individually contribute to the achievement of a shared goal or objective. Finally, level three describes formally coordinated information exchange and joint decision-making about how organizational resources will be used to achieve a shared goal. The primary distinction between level two and level three coordination is that level three involves sharing resources across organizations and engaging in joint decisionmaking around how resources will be utilized. The clarity around goals and roles and responsibilities as well as the intentional integration of resources creates superior coordination because stakeholders are motivated by a common purpose and their behavior contributes to the achievement of shared goals or objectives (Dawes, 1996; Margerum, 2011).

Interorganizational Coordination Structures

To achieve IOC, organizations must create structures or processes that link organizations and allow individuals to interact. The literature identifies a wide range of coordination structures that vary in purpose, authority, and formalization. In terms of purpose, coordination structures may enhance interorganizational communication and information exchange, conflict resolution, or planning and decision-making (Alexander, 1993; Cejudo & Michel, 2017; Margerum & Born, 2000). Communication structures enable the transmission of information and knowledge across organizations and include data dashboards, learning forums, newsletters, and targeted technical assistance (Alexander, 1993). Conflict resolution structures aim to mediate or authoritatively resolve differences and conflict and include meeting facilitation, decision-making procedures, negotiation processes, and joint governance groups (e.g., advisory boards; Margerum & Born, 2000). Planning structures aim to establish and enforce rules and responsibilities for actors and organizations through working groups, budget reviews, and steering committees (Cejudo & Michel, 2017).

In terms of authority, coordination structures may enable or inhibit power sharing across organizations (Alexander, 1993; Margerum, 2011). Coordination structures can distribute authority to specific individuals and organizations by establishing rules about who can or cannot participate in governance processes and how they should interact and make decisions (Margerum, 2011). Coordination structures may also distribute resources to support policy implementation (Alexander, 1993). Designing coordination structures that balance the distribution of authority and resources is crucial because, according to Alexander (1993), "if it has decision-making power but lacks implementation resources, the coordinating unit may suffer a 'crisis of competence'; if it controls resources but lacks authority, it may encounter a 'crisis of legitimacy'" (p. 337). Examples of coordination structures that promote power sharing include working groups, coordinated service agreements, and monetary grants.

In terms of formalization, coordination structures may vary in the extent to which they are mandated and formally institutionalized in statutes, regulations, or administrative code (Alexander, 1993). Formal coordination structures often utilize top-down mechanisms that are coercive and authoritative but create clarity and accountability around roles and procedures (Park, Krause, & Hawkins, 2021). Formal coordination structures include budget review processes, contracts, formal guidance, and advisory boards. Informal coordination structures emerge naturally through interpersonal relationships that are sustained through continuous engagements and interactions (Emerson, Nabatchi, & Balogh, 2012; Park et al., 2021), including informal networks, meetings, and unplanned interactions. Formal coordination structures tend to

be more durable and persist over longer periods of time, while informal coordination structures are more transient (Alexander, 1993). Research indicates that a combination of formal and informal coordination structures enhances IOC overall (Margerum, 2011; Park et al., 2021; Scharpf, 1994).

MPP is expected to increase IOC in multilevel governance systems through two interrelated mechanisms (Newig & Koontz, 2014). First, MPP decentralizes decision-making during policy implementation processes, creating multiple centers of authority that develop more detailed policies that are implemented at smaller scales (Hardy & Koontz, 2008). During these processes, organizations must coordinate their roles, responsibilities, and resources to avoid gaps, redundancies, and contradictory or conflicting goals (Cejudo & Michel, 2017). Second, MPP institutionalizes vertical and horizontal interactions by requiring the inclusion of local stakeholders and members representing organizations from multiple levels of governance during planning processes (Newig & Koontz, 2014). These mechanisms create opportunities for IOC; however, decentralization and local decision-making authority cause the structure of MPP processes to vary across jurisdictions. This variation may impact the types of organizational structures used to facilitate IOC and the level of IOC achieved.

Research Objectives

This study examines IOC in multilevel governance systems during school improvement processes in two states: Washington and Nevada. Importantly, it compares IOC in contexts that differ based on the structure of implementation (i.e., centralized and decentralized). As described below, Washington exhibits the characteristics of a centralized, top-down approach, and Nevada exhibits the characteristics of a decentralized, bottom-up approach. Both approaches exemplify the characteristics of MPP, but the centralized approach utilizes higher level governments to

formalize and define the roles and responsibilities of individuals and organizations at different levels of governance, while the decentralized approach allows local stakeholders to structure and control the school improvement process. Through a comparison of these processes, this study will address the following research questions:

- 1. What tools do SEAs use to facilitate IOC in multilevel governance systems?
 - a. How do the design and structure of these tools vary based on the implementation structure of school improvement processes (i.e., degree of centralization)?
- 2. How does this foster or impede IOC in each state?

Research Context: The Every Student Succeeds Act & School Improvement

The Elementary and Secondary Education Act was reauthorized as the ESSA in December of 2015, replacing the highly controversial NCLB and becoming the primary federal law that governs K-12 education in the United States. ESSA was designed to address many of the limitations of NCLB; specifically, ESSA shifts decision-making authority from the federal government to SEAs and school districts, expands accountability systems to include more robust and comprehensive sets of indicators to evaluate school performance, and provides school districts and schools with flexibility in implementing comprehensive school improvement (Cook-Harvey et al., 2016; Duff & Wohlstetter, 2019; Edgerton, 2019; Rentner, Ferguson, & Kober, 2019). Under ESSA, SEAs are required to design accountability systems that are based on challenging academic standards, state defined long-term goals, and local needs (U.S. DOE, 2017). Using data from statewide accountability systems, the bottom five percent of schools in each state are identified to participate in school improvement processes known as "comprehensive support and improvement" (CSI; CCSSO, 2017; ESSA, 2015; U.S. DOE, 2017). During these processes, state education agencies (SEAs), school districts, schools, and other local stakeholders are tasked with collaboratively developing and implementing school improvement plans. School improvement plans must be informed by local needs assessments and data from the statewide accountability system and must include evidenced-based interventions that target specific local issues. School districts and SEAs must approve and monitor the implementation of school improvement plans.

The school improvement planning process required by ESSA embodies the three essential components of the MPP approach to policy implementation: multilevel governance, nested policy cycles, and participation. First, ESSA requires policy implementation through *multilevel governance* by mandating the formulation of improvement plans at multiple levels of governance within the education system. Improvement plans at the school district level must describe the districts' role during school improvement processes. This includes a description of how school districts will (1.) support schools in developing and implementing improvement plans, (2.) monitor schools in improvement, (3.) align resources to support improvement efforts, and (4.) modify current policies to provide schools with operational flexibility to implement improvement plans (CCSSO, 2017; ESSA, 2015). Similarly, plans at the state level must describe how states will (1.) provide technical assistance and support to school districts with schools in improvement, (2.) monitor and evaluate school districts with schools in improvement, and (3.) reduce administrative barriers to enable local flexibility in school improvement processes (CCSSO, 2017; ESSA, 2015; U.S. DOE, 2017). These planning processes establish clear goals, distribute authority across levels of governance, and formalize state and district roles and responsibilities during the school improvement process (Mostert et al., 2007; Tippett et al., 2005). This ensures that accountability for student and school performance is shared across multiple levels of governance.

ESSA institutionalizes *nested policy cycles* at the school level by requiring the development and implementation of comprehensive support and improvement plans (ESSA, 2015). According to ESSA, school improvement plans should be based on a local needs assessment and informed by accountability system indicators and local data. Based on these sources of information, improvement plans aim to define the problem, establish goals and measurable outcomes, and outline improvement strategies that are based on evidence-based interventions. School improvement plans are time bound and must be revised on a regular frequency (CCSSO, 2017; U.S. DOE, 2016; U.S. DOE, 2017). The school improvement planning process creates an additional step between the established policy goals and local policy implementation processes, creating flexibility in the implementation of the federal top-down policy mandate (Newig & Koontz, 2014). During the planning process, local administrators have the authority to make important collective choice decisions while formulating policy at the local level.

ESSA also mandates local *participation* in school improvement planning by requiring that schools and districts develop and implement school improvement plans in partnership with state and local stakeholders (i.e., teachers, administrators, parents, and representatives from the community; Chism, 2017; King, 2016; U.S. DOE, 2017). Stakeholder participation ensures that the school improvement plan is formulated by the individuals charged with implementing it (Schmitter, 2002). This ensures that it is informed by local knowledge and customized to suit local conditions. Additionally, participation in planning processes may improve perceptions of policy legitimacy because stakeholders can affect decision-making and codetermine policy (Koontz & Johnson 2004; Newig & Fritsch 2009; Newig & Koontz, 2014).

Research Design

In order to investigate IOC during the implementation of ESSA, this study uses a mixedmethod, comparative case study approach to examine school improvement planning processes in two states (Yin, 2018). Case studies are appropriate for examining complex phenomena in situations where it is not possible to distinguish the case from its context.

Case Selection

To tease out the influence of policy implementation structure on IOC during school improvement processes, this study compares two states – Washington and Nevada – that have similar education governance systems but diverge on policy implementation structure and the extent to which the school improvement planning process is designed and controlled by SEAs. From the population of western continental states, Nevada represents a typical decentralized implementation case, and Washington represents centralized implementation case (Seawright & Gerring, 2008).

For case selection purposes, centralization of school improvement process implementation in all western states was measured using information that was reported in each state's Consolidated State Plan, which describes the state's responsibilities and supports during the school improvement process, the allowable strategies for improvement, and the required participants in the planning process. Each state was scored on the degree of role specification, the degree to which the state formally requires collaboration, and the degree to which the state plan includes top-down implementation strategies during improvement planning. Generally speaking, decentralized cases did not specify specific actor roles, did not require collaboration, and did not specify specific procedures or intervention strategies, while centralized cases formally established stakeholders that must participate and their roles and responsibilities, require collaboration during planning processes, and describe specific procedures and

intervention strategies. Nevada and Washington exhibit theoretically important differences that help elucidate how variation in policy implementation structure impacts IOC during school improvement planning processes.

Methods

This research draws on document analysis and in-depth interviews. Document analysis was conducted on state-level policy documents. Four main types of documents were collected for each case: (1.) formal policy documents required by ESSA; (2.) governance process documentation; (3.) state provided guidance and technical assistance resources; and (4.) publicly published performance data. These documents were analyzed to provide evidence of the design and implementation of the statewide school improvement process and coordination tools. Additionally, these documents provided evidence of the system context and the history of the school improvement processes for each case.

In addition to document analysis, in-depth, semi-structured interviews were conducted with a purposive sample of 10 key informants (4 from Nevada and 6 from Washington). Key informants are state-level policy actors that have been involved in the design and implementation of the statewide school improvement process. Key informants were identified during document analysis. Additionally, to ensure that a representative sample of state-level stakeholders was included for each case, interviewees were selected using a snowball sampling technique (Auerbach & Silverstein, 2003). Interview questions were designed to elicit responses that provided evidence of implementation structure, decision-making procedures, formal and informal coordination mechanisms, and process improvements and changes over time (e.g., if their roles have become more defined over time, how they have learned to better support and monitor school districts with schools in improvement, etc.). Due to the COVID-19 pandemic, all

interviews were conducted by virtual meeting (i.e., Zoom). Interviews were recorded and transcribed verbatim following the interview using Otter.ai transcription software. Interview transcriptions were then systematically coded using NVivo qualitative analysis software and an a priori codebook to identify prominent themes (Miles & Huberman, 1994).

Preliminary Results

First, this section will sketch a thorough description of the school improvement processes in Washington and Nevada, noting specific organizational structures designed to promote IOC as well as areas where elements of MPP are integrated. In the following section, I will discuss how the design of these structures fostered and impeded IOC.

Washington

Office of System and School Improvement

In Washington state, the school improvement process is facilitated by the Office of System and School Improvement (OSSI). The goal of OSSI is "to provide technical assistance, resources, and support in collaboration with internal and external partners to these identified schools" (OSPI, n.d.). OSSI offers three types of support to schools and districts in improvement, including school improvement grant funding, research-based resources and trainings, and Continuous Improvement Partners.

Continuous Improvement Partners are OSPI contractors that provide direct services to CSI schools and districts with CSI schools. CIPs offer system-level support and aim to extend OSSI's Essential Elements of Continuous Improvement, which include the elevation of antiracist practices, the development of equitable supports, leadership at all levels, data inquiry, and improvement science, to schools and districts in improvement. To accomplish this, CIPs work in partnership with an OSSI liaison and their local educational service districts (known as the Regional Coordinated Support Teams) to facilitate continuous school improvement and support the design and implementation of the SIPs. OSPI hires between fifteen and twenty-five CIPs annually.

School Improvement Plan

The school improvement plan is the "foundational document that drives the improvement process" (OSSI, 2021a). According to OSPI, high quality school improvement plans have six traits (OSPI, 2021b). First, SIPs are specific, measurable, attainable, realistic, time-bound, inclusive, and equitable (i.e., based on S.M.A.R.T.I.E. goals). Second, SIPs are informed by local data sources, a needs assessment, and WSIF data and are designed to promote a culture of data inquiry within schools. Third, SIPs establish clear roles and responsibilities for improvement plan implementation and on-going progress monitoring. Fourth, SIPs include the use of evidence-informed best practices. Fifth, SIPs are subject to regular monitoring and revision using Plan-Do-Study-Act cycles of inquiry. Sixth, SIPs must include a plan for scaling and sustaining the practices and behaviors articulated in the plan. SIPs are viewed as living, actionable documents that are monitored and revised regularly.

OSPI provides an optional SIP Template for schools. To design this template, OSSI coordinated with other departments at OSPI to identify common requirements and create a consolidated school improvement plan template that meets the requirements of all federal programs. This means that schools have to submit a single plan rather than multiple plans for each federal program.

CSI schools are required to upload their updated SIPs to a SharePoint site twice a year in January and June. SIPs are reviewed by the Continuous Improvement Partners using a Feedback Rubric that was created by OSSI to ensure a standard review process. SIPs are not scored, but the

Feedback Rubric is used to provide targeted feedback and inquire further about current local practices. Importantly, the SIP for all CSI schools are reviewed by CIPs even if the school is not actively working with the CIP. This ensures that all schools are receiving feedback directly from OSPI. Additionally, SIPs must also be provided when CSI schools apply for school improvement grants. The School Improvement Grants Manager reviews the SIPs alongside the schools' grant application to ensure that proposed funding expenditures are aligned with the improvement strategies articulated in the SIP and to provide feedback specifically around the use of federal and state improvement funds.

Coordinated Service Agreement

The Coordinated Service Agreement (CSA) is published annually by OSPI and the Association of Educational Service Districts. The CSA serves several important purposes. First, the CSA defines the statewide initiatives, priorities, and goals for the school year and describes the underlying principles and theory of action for achieving those goals. Second, the CSA outlines the funding that will be distributed to educational service districts to support the implementation of the CSA. Third, within the CSA, the roles and responsibilities of OSPI and ESD representatives are clearly designated and delineated. For example, the Director of Continuous Improvement "Collaborates, coordinates, and communicates with ESD Leads in providing technical assistance, resources, and supports to schools identified for improvement supports" (OSPI/AESD, 2020, p. 12). Similarly, the AESD Champion "participates in monthly phone conferences with OSSI for the purpose of facilitating ongoing two- way communication, disseminating essential information, identifying ESD regional needs, and coordinating logistics" (OSPI/AESD, 2020, p. 13). Finally, the CSA describes the team and meeting structures that provide a framework for collaborative work between OSPI and the educational service districts.

The team and meeting structures established within the CSA create an interorganizational network of state and regional stakeholders that frequently interact to coordinate the school improvement processes. Collectively, there are six team and meeting structures. Four of these teams meet monthly, including the Pre-Regional Improvement Network, the Regional Improvement Network, the OSSI All-Call, and the Data Improvement Network. Additionally, there are biannual Outreach events and Triannual Statewide Convenings. The team and meeting participants vary for each structure, ranging from OSSI team members and ESD representatives (e.g., Pre-Regional Improvement Network) to the entire statewide improvement network of Continuous Improvement Partners, ESD Leads, ESD coaches, OSSI Liaisons, and OSPI partners (e.g., Triannual Structures). The purpose of these meetings also varies, but they provide opportunities for OSPI to provide technical assistance, guidance, and information, for OSPI to promote a coherent and consistent vision for school improvement, and for Coordinated Support Teams to learn from teams in other regions.

Nevada

Office of Student & School Support

In Nevada, the Office of Student and School Support (OSSS) facilitates school improvement. OSSS "works in partnership with schools and districts to support and improve teaching and learning to help students achieve in a safe and academically challenging environment" (NDE, n.d.). OSSS offers several school support resources, including grants, leadership support, and guidance for selecting evidence-based providers.

Continuous Improvement Process

The Continuous Improvement Process is the process that schools work through to develop their School Performance Plan (SPP). The Continuous Improvement Process was

designed during the 2020-21 school year by a team comprised of school, district, and state stakeholders, known as the "Design Partnership". The Design Partnership aimed to establish "a modernized approach to school and district continuous improvement based on the shared belief that the historic approach to school improvement planning was not fully serving our schools, communities, or students" (NDE, 2021a). The Continuous Improvement Process supports local decision-making during school improvement planning processes, and was intentionally designed to promote shared leadership, data-informed decision-making, and cyclical processes of continuous improvement.

The Continuous Improvement Process is a series of "synchronous and asynchronous learning opportunities for district and school leaders" (NDE, 2021a) that begin in June of each year and are held weekly through September. These learning opportunities are organized around three acts comprised of nine events (NDE, 2021b). Act One is referred to as "Setting the Course" and includes a CIP orientation that formalizes the school continuous improvement team, a CNA, a Root Cause Analysis, and the development of the SPP Roadmap. Act Two is referred to as "Navigating the Course" and includes three SPP Roadmap status checks that support local monitoring of the implementation of the SPP Roadmap. Finally, Act Three is referred to as "Reviewing our Journey" and includes an evaluation of the process and the identification of areas for future improvement. The Continuous Improvement Process culminates in a completed SPP Roadmap.

The Continuous Improvement Process was fully implemented as the "CIP beta" during the 2021-2022 school year. Prior to statewide implementation, the Continuous Improvement Process was piloted with several schools and districts and adjusted based on their feedback. The CIP beta provides comprehensive supports to schools and districts as they transition to the new

school improvement model. Additionally, the process is deliberately implemented as a "beta" version to ensure that the process will continue to be refined and revised.

School Performance Plan

The SPP acts as a roadmap for achieving improvement goals that is aligned with state and federal laws and guidelines. The SPP is submitted annually by the school to the school district, who approves the plan. The school districts then submit the approved SPPs from all CSI schools within their district to the NDE using the NDE Bighorn Education portal, a password protected SharePoint site, before November 1st of each school year. Following school district submission of the SPPs, the CSI/TSI team, in partnership with other departments at NDE, conducts an SPP review using the SPP Review Rubric. The SPP Review Rubric was developed in the final year of the first school improvement cycle. SPPs are not scored using the rubric, nor are they treated as "compliance tools"; rather, the rubric is considered "hold harmless" as it guides the review process and is used to offer specific feedback and guidance to schools. During the review process, NDE analyzes the identified issues, goals, and intervention strategies to ensure that there is internal alignment and cohesion. The CSI/TSI team dedicates two months to SPP review, which includes a meeting with each district to review the results of the SPP review process and provide the district with specific feedback for the CSI schools. Additionally, the CSI/TSI team conducts regular process monitoring of school and district implementation of the SPP throughout the year.

Level of Interorganizational Coordination

Roles & Responsibilities

High levels of IOC require well defined roles and responsibilities that specify how participating individuals and organizations should interact and what functions and activities should be executed and enforced (Lie, 2011; Streeter et al., 1986). In Washington, the CSA creates Level Three coordination by clearly describing and delineating the roles and responsibilities of OSPI and ESD representatives during the school improvement process. The CSA is a formal coordination structure that enables power sharing between OSPI and the ESDs by distributing authority to specific individuals and dispersing resources to support effective implementation. For example, according to the CSA, the Director of Data and Implementation is responsible for facilitating the Data Improvement Network. The Data Improvement Network aims to "build capacity for data-informed decision making at every level of the education system" (OSPI/AESD, 2020, p. 15). The CSA creates clarity around goals and values and creates a shared understanding of the school improvement process.

Shared understandings ensure that stakeholders are motivated by a common purpose and their behavior contributes to the achievement of shared goals or objectives (Dawes, 1996; Margerum, 2011). In addition to creating shared understandings among multiple organizations, the CSA promotes shared understandings among both internal stakeholders as well. One informant discussed how their work contributes to shared understandings:

"In OSSI, we also have a large number of programs in our K-12 supports area. These are things like attendance, which is part of our WSIF score, ninth grade on track, which is part of the SQSS measures...We work with these programs to help them use data to improve their programs, to improve their outreach, and to be more successful in terms of their pilot efforts to change the structures of schools, school systems, to improve outcomes for specific groups of students" (4_MF, 2021)

Another example of the CSA contributing to shared understandings among internal stakeholders is by establishing the role of OSSI Liaison, which is an "OSSI program leader assigned to an

ESD to help facilitate and collaborate on the coordination of supports between OSSI and the ESD for the programmatic delivery" (OSPI/AESD, 2020, p. 12). OSSI program leaders are Program Supervisors from other support programs within the Office of Student Success, including Attendance, Early Learning, and Gate (Graduation: A Team Effort). This engages several departments within OSPI in the school improvement process, creating shared goals and accountability.

While the CSA creates clarity around individual roles and responsibilities, in practice, it may be too restrictive and impractical in practice. For example, one informant described their struggle adhering to the role defined within the CSA:

"That's been a challenge, because if you put in there that you're going to do something for math, then I'm trying to push them to do it, but I can't really help them specifically with math. It's been a little bit confusing" (5_MM, 2021).

SEAs must weigh the tradeoffs associated with formally defining the roles and responsibilities of different stakeholders.

In contrast, the coordination tools in Nevada often do not formalize the roles and responsibilities of individuals and organizations, which impedes IOC in two ways. First, there is a lack of shared understanding among internal stakeholders:

"I honestly think that not everybody has a shared understanding of what school improvement work is and the continuous improvement cycle. There are folks in the agency who have, for example, never seen an SPP" (4 GL, 2021)

This creates silos that fragment the work of NDE departments. Second, without formalized authority, one NDE representative describes having to justify their actions and how they spend their time to leadership within their organization:

"The justification and rationale behind why this is needed, I had to present and explain... so that my leadership could understand why" (1_TW, 2021)

"We just had a team meeting with my supervisor yesterday, and we were like 'capacity is a big issue. I see our role here, doing these things, but then we get pulled into these things.' We needed her help to find the balance: what are we going to adhere to?"

(1_TW, 2021)

This finding is aligned with previous research that demonstrates how decentralized implementation approaches in hierarchical systems may encounter barriers as staff-level representatives need to obtain buy-in and commitment from their organizations' leadership (Huxham & Vangen, 2005; Margerum, 2011). Coordination tools that specify roles and responsibilities formalize the functions and activities that should be executed and enforced, creating a shared understanding of the school improvement process as well as a culture of shared accountability.

Communication & Information Exchange

IOC requires communication and information exchange that allows individuals and organizations to create more comprehensive interpretations of the policy issues and codetermine solutions to policy problems (Dawes, 1996). One difference between Washington and Nevada is in the standardization of communication and information exchange tools. In Washington, there is an attempt to create standardized coordination tools. For example, Continuous Improvement Partners are trained to review the school improvement plans for their regions:

"We have these monitoring cycles for the school improvement plans. In December with the DISE [a subgroup of the Data Improvement Network] and those partners, we're going

to help them calculate and calibrate how to review those school improvement plans, so that their feedback is turning to look more and more similar" (4 MF, 2021)

In contrast, in Nevada, communications are targeted to specific districts based on their expressed needs:

"We, the state, do help and support districts who then help and support their schools with coming up with that plan, that implementation plan for that year. That looks like providing technical assistance, jumping on phone calls, zooms and webinars with the districts to talk about the status of their schools and to talk about the support that they're providing and a path for moving forward. It really is different for each district" (4_GL, 2021).

Discussion/Conclusion

My analysis demonstrates that SEAs use similar types of coordination tools; however, the implementation structure used by the state impacts the level of IOC achieved. In a centralized, top-down context, IOC is facilitated by the formalization of rules and responsibilities, which creates clarity around goals and values, enables power sharing, and promotes shared accountability, but may be too restrictive and impractical in practice. In a decentralized, bottom-up context, IOC is impeded by a lack of authority at the state-level to formalize roles and responsibilities, which produces a lack of shared understandings of the overarching school improvement process, its goals and objectives, and individual and organizational roles during the process, but allows for more targeted support based on locally identified needs.

Citations

- Adams, C. M., Ford, T. G., & Forsyth, P. B. (2017). Next generation accountability: A vision for improvement under ESSA. Palo Alto, CA: Learning Policy Institute.
- Alesina, A., & Spolaore, E. (1997). On the number and size of nations. *The Quarterly Journal of Economics*, 112(4), 1027-1056.
- Alexander, E. R. (1993). Interorganizational coordination: Theory and practice. *Journal of Planning Literature*, 7(4), 328-343.
- Auerbach, C. F., & Silverstein, L. B. (2003). *Qualitative data: An introduction to coding and analysis.* New York, NY: New York University Press.
- Benson, D., & Jordan, A. (2010). The scaling of water governance tasks: A comparative federal analysis of the European Union and Australia. *Environmental Management*, 46(1), 7-16.
- Brody, S. D., Godschalk, D. R., & Burby, R. J. (2003). Mandating citizen participation in plan making: Six strategic planning choices. *Journal of the American Planning Association*, 69(3), 245-264.
- CCSSO. (2017). CCSSO principles of effective school improvement systems. Washington, DC: Council of Chief State School Officers.
- Cejudo, G. M., & Michel, C. L. (2017). Addressing fragmented government action: Coordination, coherence, and integration. *Policy Sciences*, *50*(4), 745-767.
- Chism, M. M. (2017, April 10). Dear colleague letter on school support and improvement activities and consultation. Washington, DC: U.S. Department of Education, Office of Elementary and Secondary Education. Retrieved from https://www2.ed.gov/policy/elsec/leg/essa/dcltr410207.pdf
- Cook-Harvey, C. M., Darling-Hammond, L., Lam, L., Mercer, C., & Roc, M. (2016). *Equity and ESSA: Leveraging educational opportunity through the Every Student Succeeds Act.* Palo Alto, CA: Learning Policy Institute.
- Darling-Hammond, L., Wilhoit, G., & Pittenger, L. (2014). Accountability for college and career readiness: Developing a new paradigm. *Education Policy Analysis Archives*, 22(86), 1-38.
- Dawes, S. S. (1996). Interagency information sharing: Expected benefits, manageable risks. *Journal of Policy Analysis and Management*, 15(3), 377-394.
- Duff, M., & Wohlstetter, P. (2019). Negotiating intergovernmental relations under ESSA. *Educational Researcher*, 48(5), 296-308.
- Edgerton, A. K. (2019). The essence of ESSA: More control at the district level? *Phi Delta Kappan*, *101*(2), 14-17.
- Emerson, K., Nabatchi, T., & Balogh, S. (2012). An integrative framework for collaborative governance. Journal of Public Administration Research & Theory, 22(1), 1-29.
- Every Student Succeeds Act of 2015, Pub. L. No. 114-95 § 114 Stat. 1177 (2015). https://www.congress.gov/114/plaws/publ95/PLAW-114publ95.pdf
- Finnigan, K. S., & Daly, A. J. (2012). Mind the gap: Organizational learning and improvement in an underperforming urban system. *American Journal of Education*, 119(1), 41-71.
- Gollata, J. A., & Newig, J. (2017). Policy implementation through multi-level governance: Analysing practical implementation of EU air quality directives in Germany. *Journal of European Public Policy*, 24(9), 1308-1327.
- Hardy, S. D., & Koontz, T. M. (2008). Reducing nonpoint source pollution through collaboration: Policies and programs across the US States. *Environmental Management*, *41*(3), 301-310.
- Harris, A. (2002). School improvement: What's in it for schools? New York, NY: RoutledgeFalmer.
- Honig, M. I. (2006). Street-level bureaucracy revisited: Frontline district central-office administrators as boundary spanners in education policy implementation. *Educational Evaluation & Policy Analysis*, 28(4), 357-383.
- Hopkins, D., Ainscow, M., & West, M. (1994). School improvement in an era of change. London, UK: Cassell.
- Hooghe, L., & Marks, G. (2003). Unraveling the central state, but how? Types of multi-level governance. *American Political Science Review*, 97(2), 233-243.

- Hooghe, L., Marks, G., & Schakel, A. (2020). Multilevel governance. In D. Caramani (Ed.), *Comparative politics*.
- Kay, A. (2017). Multi-level governance and the study of Australian federalism. In K. A. Daniell & A. Kay (Eds.), *Multi-level governance: Conceptual challenges and case studies from Australia* (pp. 33-36). ANU Press.
- King, J. B. (2016, June 23). Dear colleague letter on stakeholder engagement. Washington, DC: U.S. Department of Education. Retrieved from https://www2.ed.gov/policy/elsec/guid/secletter/160622.html
- Koontz, T. M., & Newig, J. (2014). Cross-level information and influence in mandated participatory planning: Alternative pathways to sustainable water management in Germany's implementation of the EU Water Framework Directive. *Land Use Policy*, *38*, 594-604.
- Kraak, A. (2011). Horizontal coordination, government performance and national planning: The possibilities and limits of the South African state. *Politikon*, *38*(3), 343-365.
- Lie, A. (2011). Coordination processes and outcomes in the public service: The challenge of interorganizational food safety coordination in Norway. *Public Administration*, 89(2), 401-417.
- Margerum, R. D. (2011). *Beyond consensus: Improving collaborative planning and management*. MIT Press.
- Margerum, R. D., & Born, S. M. (2000). A co-ordination diagnostic for improving integrated environmental management. *Journal of Environmental Planning and Management*, 43(1), 5-21.
- Marks, G., & Hooghe, L. (2000). Optimality and authority: A critique of neoclassical theory. *Journal of Common Market Studies*, 38(5), 795-816.
- Mattesich, P., Murray-Close, M., & Monsey, B. (2001). Collaboration: What makes it work: A review of research literature on factors influencing successful collaboration. Amherst H. Wilder Foundation.
- May, P. J., & Winter, S. C. (2009). Politicians, managers, and street-level bureaucrats: Influences on policy implementation. *Journal of Public Administration Research & Theory*, *19*(3), 453-476.
- Metcalfe, L. (1994). International policy co-ordination and public management reform. International Review of Administrative Sciences, 60, 271–90.
- Miles, M. B., & Huberman, A. M. (1994). *Qualitative data analysis: An expanded sourcebook* (2nd ed.). Thousand Oaks, CA: Sage Publications.
- Milio, S. (2010) From policy to implementation in the European Union: The challenge of the multi-level governance system. Tauris Publishers.
- Mostert, E., Pahl-Wostl, C., Rees, Y., Searle, B., Tàbara, D., & Tippett, J. (2007). Social learning in European river-basin management: Barriers and fostering mechanisms from 10 river basins. *Ecology & Society*, *12*(1).
- Murphy, J. (2013). The architecture of school improvement. *Journal of Educational Administration*, 51(3), 252-263.
- Murphy, J., & Datnow, A. (Eds.). (2003). *Leadership lessons from comprehensive school reforms*. Thousand Oaks, CA: Corwin Press.
- Newig, J., & Fritsch, O. (2009). Environmental governance: Participatory, multi-level–and effective? *Environmental Policy and Governance*, 19(3), 197-214.
- Newig, J., & Koontz, T. M. (2014). Multi-level governance, policy implementation and participation: The EU's mandated participatory planning approach to implementing environmental policy. *Journal of European Public Policy*, 21(2), 248-267.
- Nevada Department of Education (n.d.). *Office of student & school supports*. Retrieved March 3, 2022, from <u>https://doe.nv.gov/Office_Divisions/Student_and_School_Supports/</u>
- Office of the Superintendent of Public Instruction (n.d.). *System and school improvement*. Retrieved February 25, 2022, from <u>https://www.k12.wa.us/student-success/support-programs/system-and-school-improvement</u>

- Office of the Superintendent of Public Instruction (2020). Request for qualifications no. 2021-01: Continuous improvement partners. Retrieved March 1, 2022, from https://www.k12.wa.us/sites/default/files/public/rfp/pubdocs/RFQ_2021-01_CIPs_FINAL.pdf
- Office of the Superintendent of Public Instruction/Association of Educational Service Districts (2020). Coordinated service agreement (CSA).
- Office of System and School Improvement. (2021). OSPI SY 2021-2022 School improvement plan (SIP) implementation guide. Retrieved March 1, 2022 from <u>https://www.k12.wa.us/sites/default/files/public/ossi/schoolimprovement/pubdocs/Implementatio</u> <u>n%20Guide%202021-2022%20SIP.pdf</u>
- Ostrom, E. (1999). Coping with tragedies of the commons. *Annual Review of Political Science*, 2(1), 493–535.
- Ostrom, V., Tiebout, C. M., & Warren, R. (1961). The organization of government in metropolitan areas: A theoretical inquiry. *American Political Science Review*, 55(4), 831-842.
- O'Toole, L. J. (2011). The EDA in Oakland: A case that catalyzed a field. Public Administration Review, 71(1), 116-120.
- Park, A. Y., Krause, R. M., & Hawkins, C. V. (2021). Institutional mechanisms for local sustainability collaboration: Assessing the duality of formal and informal mechanisms in promoting collaborative processes. *Journal of Public Administration Research & Theory*, 31(2), 434-450.
- Peters, B. G. (2015). *Pursuing horizontal management. The politics of public sector coordination.* University Press of Kansas.
- Peters, B. G., & Pierre, J. (2001). Developments in intergovernmental relations: Towards multi-level governance. *Policy & Politics*, 29(2), 131-135.
- Pressman, J. L., & Wildavsky, A. (1973). Implementation. Berkeley, CA: University of California Press.
- Rentner, D. S., Ferguson, M., & Kober, N. (2019). A stronger future for evidence-based school improvement in ESSA. Washington, DC: Center on Education Policy.
- Scharpf, F. W. (1994). Games real actors could play: Positive and negative coordination in embedded negotiations. *Journal of Theoretical Politics*, 6(1), 27-53.
- Schmitter, P. C. (2002). Participation in governance arrangements: Is there any reason to expect it will achieve "sustainable and innovative policies in a multi-level context"? In J. R. Grote and B. Gbikpi (Eds), Participatory governance: Political and societal implications (pp. 51-69). Leske+Budrich.
- Seawright, J., & Gerring, J. (2008). Case selection techniques in case study research: A menu of qualitative and quantitative options. *Political Research Quarterly*, *61*(2), 294-308.
- Streeter, C. L., Sherraden, M. W., Gillespie, D. F., & Zakour, M. J. (1986). Curriculum development in interorganizational coordination. *Journal of Social Work Education*, 32-40.
- Thomann, E., & Zhelyazkova, A. (2017). Moving beyond (non-)compliance: The customization of European Union policies in 27 countries. *Journal of European Public Policy*, 24(9), 1269-1288.
- Tippett, J., Searle, B., Pahl-Wostl, C., & Rees, Y. (2005). Social learning in public participation in river basin management—early findings from HarmoniCOP European case studies. *Environmental*
- Trein, P., Biesbroek, R., Bolognesi, T., Cejudo, G. M., Duffy, R., Hustedt, T., & Meyer, I. (2021). Policy coordination and integration: A research agenda. *Public Administration Review*, *81*(5), 973-977.
- U.S. Department of Education. (2016). Non-regulatory guidance: Using evidence to strengthen education investments. Retrieved from

https://www2.ed.gov/policy/elsec/leg/essa/guidanceuseseinvestment.pdf

U.S. Department of Education. (2017). Accountability under Title I, Part A of the ESEA: Frequently asked questions. Retrieved from

https://www2.ed.gov/programs/titleiparta/eseatitleiaccountabilityfaqs.pdf

- Weber, E. P., & Khademian, A. M. (2008). Wicked problems, knowledge challenges, and collaborative capacity builders in network settings. *Public Administration Review*, 68(2), 334-349.
- Yin, R. K. 2003. Case study research: Design and methods. Thousand Oaks, CA: Sage Publications.

Young, O. R. (2002). The institutional dimensions of environmental change: Fit, interplay, and scale. MIT Press.