

ABSTRACT

Title of Document: ORGANIZATIONAL CHANGES IN STATE
EDUCATION AGENCIES: RESPONSES TO
STANDARDS-BASED ACCOUNTABILITY

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This study examines organizational changes in state education agencies (SEAs) in the context of current standards-based accountability policies. It identifies the changing organizational characteristics of SEAs and depicts the organizational motivations and strategies adopted to bring about change. Based on institutional theory and empirical evidence from state departments of education, the study proposes a theoretical framework that explains the organizational change process. The organizational level analysis illustrates the impact of standards-based accountability policy on the structure and networks of SEAs and highlights the importance of organizational analysis in the policy design process.

The study employs a mixed-methods design to investigate the changing experience of state departments of education in the past two decades with a focus on the post-No Child Left Behind era. Together with primary and secondary texts and documents, it draws data from interviews with state officials in ten state departments of education and national surveys of 50 states in 2003, 2004 and 2007. The study identifies internal changes regarding organizational structure,

staffing, and technology as well as external changes in terms of their functions and working relationships with other educational agencies. To understand the process of organizational change, the study examines the organizational motivations and strategies that state departments of education used to bring about these changes.

The study finds that, since early 1990s, state departments of education have gradually changed their role in the U.S. education system from monitoring finance administration to compliance with federal requirements to provide technical assistance. The organizational structure is changed to increase internal efficiency accompanied by a decrease in administrative staff but an increase in the need for technical staff, particularly staff that can help with the increasing technology in the organizations' data systems. State departments of education developed new relationships with local educational agencies with unprecedented attention on student academic performance and school management. These changes were pushed by both state and federal reforms that highlight the positive role state agencies can play to improve school performance. To make these changes happen, state departments have used networking as a way to expand organizational capacity and pushed cross-level collaboration to improve organizational efficiency.

ORGANIZATIONAL CHANGES IN STATE EDUCATION AGENCIES:
RESPONSES TO STANDARDS-BAESD ACCOUNTABILITY

By

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To my parents, Boyin Zhang and Jiahua Wu, for everything.

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Chapter 1: Introduction

The passing of the No Child Left Behind (NCLB) Act of 2002 ushered in a new era of education policy that not only directed more policy attention from inputs to outputs from public schools, but also intensified the debate on standards-based accountability (SBA) as a means to meet the expectations for education outcomes. Historically, public education in the United States featured a tradition of local control where public schools aimed to serve the collective interests of local communities. NCLB's emphasis on standardized assessment of student achievement and centralized evaluation of school performance greatly reshaped the structure and the function of agencies in the education system. Consequently, it pushes forward the momentum of a power shift from local to state education agencies (SEAs) and makes the latter a driving force in implementing the federal law. SEAs are the government agency in each U.S. state to provide services to local education system. This study focuses particularly on the statutory offices, the state departments of education, under the supervision of chief state school officers, either titled as state superintendents or commissioners of education. State education initiatives by state departments of education are often determined by the support they gain from governors and state legislators (McDonnell & McLaughlin, 1982).

This dissertation examines the changing experience of SEAs, as they are sandwiched between federal mandates and the expectations of local schools and districts, to illustrate the impact of policy changes on organizational function and capacity. The goal of the study is to construct a conceptual framework that

explains organizational change in the turbulent policy environment and to extend the scope of policy implementation studies to include organizational analysis as an essential component.

Purpose of the Study

Shifts in the policy environment toward SBA have led to major changes in SEAs. The tension between the country's tradition of local control and the resurgence of federal initiated SBA reform further intensify the debate regarding SEAs' role as intermediate governmental agencies that oversee the implementation of federal and state education policies in local schools. To inform this debate, this study illustrates how the institutional shift to SBA impacts SEAs as institutionalized organizations that constantly respond to the changing institutional environment for resources.

The U.S. education system, with its complex social structures, has three major tiers of governance – federal, state and district. Each tier of governance has a particular range of authority that links closely to the country's politics and history. This study focuses on education agencies at the state level for two main reasons, namely, the increasing importance of SEAs in implementing the SBA policy and the lack of research that examines SEAs' functions in the U.S. education system.

The current SBA movement has enabled SEAs to have more authority than merely supplying local schools with funding and a voluntary curriculum. SEAs are designated to evaluate schools and to apply rewards or sanctions based on state standards and student performance on state assessments. This entitled

power has, on one hand, boosted SEAs' political status and, on the other hand, challenged their capacities to implement the law without being too offensive to the tradition of local control. The American education system follows three fundamental principles – local control, federalism and professionalism (Chubb, 2001). The local control principle posits that communities where students and their families live have the best knowledge of students' educational needs and, therefore, should make the decision about organizing schools. According to this principle, public schools in the United States are governed and administered by boards of education that are elected or appointed to represent interests of local communities.

The principle of federalism refers to the shared power between the federal and the state governments. Regarding education issues, however, states traditionally reserve great autonomy and delegate major responsibilities to local districts. The local delegation of state power and the minimal federal mandates on education circumvent the potential conflicts between the principles of local control and federalism at schools. In current SBA reform, however, interests and administration of the state-level agencies are highlighted and increasingly influenced by the federal law that expresses clear expectations on school performance; local control is constantly under external scrutiny from the state. As the two principles show increasing conflicts, local districts in some cases become a central force against the top-down approach that undergirds the SBA policy.

The last principle, professionalism, suggests that results in political campaigns should not result in appointed positions that influence the delivery of

education; instead, education “should be delivered by professionals, individuals who have been certified as skillful and knowledgeable and who can be trusted to make decisions objectively, consistent with education policy and the best interest of children” (Chubb, 2001, p. 23). Chubb (2001) argued that a professional system needs both autonomy and accountability and particularly emphasized the importance of the latter that is often lacking in education. What have been troubling the SBA implementation are the discrepancies between the autonomic decision to be made by the professionals and the external standards to which they are held accountable.

The standards-based reform movement has been prominent in education since the post-World War II era. Progressive reformers in the 1960s and 70s believed “good ideas would travel of their own volition (to schools)” (Elmore, 1995, p. 18), but these ideas failed to bring about changes on a larger scale. The federal government then started funding large-scale reform initiatives to form a pool of innovative ideas for organizing public schools (Fullan, 2007). The increasing public concerns about education quality and equality pushed political entities to address education issues as an important theme in their political agenda. The Education Consolidation and Improvement Act in 1981 consolidated federal grants and gave states greater control over spending. In the early 1990s, President George H. W. Bush initiated the standardization agenda with a call for a “national crusade” (Bush, 1991, p. 648, adapted from Jennings, 1998) to measure progress toward national education goals and standards with a national test. Later, the Educate America Act: Goals 2000 in 1994, proposed by the Clinton

administration, continued pushing the agenda of standardization and required states to set standards and assessments before receiving federal education funds, and these standards had to be approved by the U.S. Department of Education (McGuinn, 2006). The NCLB Act proceeds with this policy theme of standardization with approval from both leading political parties despite their long history of disagreement on the federal government's role in public education (Jennings, 1998; McGuinn, 2006).

Caught between the federal push for SBA and the tradition of local control, SEAs have become a battlefield filled with political tensions. An understanding of SEAs' function in relation to districts and other interest groups, therefore, seems particularly necessary before we search for an approach to address the competing ideas for the governance of education. Despite doubts about state capacity and concerns over the decay of local control, SEAs have employed a variety of strategies and approaches to address the requirements from the federal government and to respond to local schools. Sandwiched between the federal government and local districts and schools, SEAs serve as important intermediate organizations to translate education policy into school practice. A theoretical understanding of these organizational practices may provide meaningful insights for the future development of inter-governmental cooperation in the implementation of school reform policy.

The second reason for this study is the scarcity of research on SEAs. Despite the role of SEAs being heavily debated in the policy arena, research has not addressed the development of SEAs as a social organization in a particular

context of institutional orientation, such as the current inclination to SBA. SEAs as social entities do not exist in a vacuum; as institutional theories suggest, their organizational structures and practices resemble their institutional environment. Institutional sociologists have contributed significantly to the understanding of educational organizations; they have analyzed schools, school districts, and community colleges, to illustrate institutional concepts (Bidwell, 1965; Brint & Karabel, 1991; Mayer & Scott, 1977; Powell, 1991). Rowan (1982), for example, examined the impact of policy changes in the California school system on the proportion of district administrative positions in health, psychological and curriculum services. He argued that the local school system changed its structures as the institutional endorsement fluctuated. Between 1930 and 1970, school districts in California reduced the personnel in health services as the institutional environment shifted its attention away from the delivery of health services at schools. In contrast, personnel in the psychological services grew in response to the consistent institutional emphasis. The orientation of institutional environments shifted through state mandates, the establishment of professional certification programs and professional organizations, programs available at higher education institutions, and the availability of external funding. The employment for curriculum services showed the most fluctuation because the institutional environment was most unstable. Findings of this study show that local schools tend to eliminate those structural elements that lack support from the institutional environment. This study is unique because it is one of the few institutional studies

that illustrate the dynamics between the larger institutional context and educational organizations.

Two reasons may explain the lack of research that applies institutional theories to education. First, a disciplinary divide has prevented institutional theories in sociology from being widely acknowledged in the study of education. Burch (2007) argued that perceptions of institutional theory as overemphasizing macro-level social institutions disguised its applicability to organizational changes and educational issues.

Institutional theories provide a rich theoretical basis for understanding education reform and policy implementation. For instance, it is widely acknowledged in organizational studies that organizations change themselves as they interact with the exogenous environment at their boundaries; they constantly face challenges and opportunities to change to make themselves more adaptable to institutional rules and partnerships (Meyer & Rowan, 1991). When the environment impedes organizational functioning and reproduction, organizations have to change in such a way that institutional contradiction and conflicts can be emolliated or mediated (Friedland & Alford, 1991). However, organizations are by no means passive in the change process. They actively shape the environment in which they are bounded so that the environmental change does not deviate too far from their goals and development.

Another line of theories of change argues that organizations are part of the institutional environment; organizations tend to change their structure to reflect changes in the environment (Jepperson, 1991). Institutional theorists often use the

concept of isomorphism to capture the phenomenon that organizations imitate external environmental elements in their internal structure. Some argue that isomorphism is a result of interdependencies between organizations and their environment (Aiken & Hage, 1968; Hawley, 1968; Thompson, 1967). Others claim that it symbolizes organization leaders' learning and their behavioral adjustment to environment changes (Hanna & Freeman, 1977). Regardless of its nature, isomorphism promotes the success and survival of organizations, especially when their structural elements are subject to evaluation by other organizations in similar fields (Meyer & Rowan, 1977). However, isomorphic changes do not necessarily promote internal efficiency; rather, they are strategies for organizations to establish legitimacy and appraise productive performance of their internal units.

The second reason why institutional theories are not widely used in education research is the difficulties of collecting appropriate data to effectively address issues in educational organizations. In addition to the complex structural and bureaucratic system that characterizes most educational organizations, the widespread fragmentation and decoupling make the structural relationship hard to depict and data that capture such dynamics hard to collect. The examination of SEAs in this study is situated in the current wave of standards-based reform symbolized by NCLB and benefits from multiple data sources collected from consistent contact with SEAs during this period. Though the data were collected without the intention to examine them through the lens of institutional theories, they were designed to capture the impact of SBA policy on SEAs (CEP, 2004,

2005, 2007a). These multiple data sources provide an opportunity to examine the general patterns of organizational responses to the institutional environment and to explore how organizational change takes place.

Research Questions and Methods

This study attempts to apply institutional theories to the analysis of educational organizations by answering two overarching questions:

1. What changes did SEAs make during the first years of NCLB to fulfill its requirements?
2. How did these changes take place?

I chose to focus on SEAs as the organizational level of interest because they have been at the forefront of implementing recent policy changes in education. For instance, in the first year of NCLB, an increasing number of states focused efforts on assessment and the alignment of state assessments to state standards (American Federation of Teachers, 2001). States developed more instructional materials and incentives to help students, particularly the ones at risk of failing, to meet these standards. However, states seemed to lack the capacity and expertise to adequately provide these services. Consequently, they were constantly criticized for the poor quality of standardized tests, inadequate curriculum and ineffective assistance to districts. Sunderman and Orfield (2008) describe the state response to NCLB as massive responsibilities and limited resources. They argued that NCLB pushed states to a central role in implementing school reform efforts, but with limited resources from outside. Therefore, some states had to prioritize some schools and districts over others. Existing literature

has alluded to the phenomenon of organizational changes at SEAs but hardly examined the changes longitudinally or provided detailed analysis of the change processes. Additionally, as SEAs steered the design and implementation of accountability measures, their interaction and collaboration with local districts and schools intensified. A study of new organizational relationships and functions not only tests the institutional assumption that change in the institutional environment, such as policy inclination to SBA, lead to changes in organizational role, structure and partnership, but also promises a new perspective to understand the impact of SBA policies.

To study the process of change from a longitudinal perspective, the study will use a qualitative dominant mixed methods design that integrates case study and survey methods with two data streams: interview data with state officials in 2007 and survey data with state leaders in 2003, 2004 and 2007.

State level interviews were conducted between February and March 2007 with ten state superintendents who had at least 5 years of experience in their current state departments to be able to speak to SEAs' organizational changes. Interview protocols were developed to explore SEAs' responsibility, structural change, partnership with districts and capacity to implement NCLB.

The state surveys were sent to superintendents of all fifty states in 2003, 2004 and 2007 and had a 100% response rate each year. The surveys inquired about state-district relationships, state capacity, and strategies to make organizational adjustments for the implementation of NCLB.

Data analysis will follow three steps, 1) interview data analysis, 2) survey data analysis, and 3) integration and triangulation to create a dialogue between the two forms of data.

Rationale for the Study

This organizational analysis of SEAs not only illustrates the experience of intermediate governmental organizations in a changing policy environment but also adds a new perspective to understand the impact of NCLB's approach to SBA policy. It contributes to the field of education research in four major ways. First, this study describes and analyzes the experience of SEAs in states with varied intensity of state activism associated with SBA. Such documentation demonstrates the wide spectrum of organizational changes in SEAs and leadership vision in terms of policy design, capacity building and intergovernmental cooperation.

Second, this study demonstrates wide implications of institutional theories for a more comprehensive understanding of the relationship between education reform and its implementing agencies. Policy research in education tends to focus on the evaluation of policy but overlooks the mechanism and the structure of organizations implementing the policies. By examining SEAs' change, this study proposes an expansion of research in education policy, taking account of more in-depth understanding of implementing agencies.

Third, this study constructs a theoretical model that illustrates the process of change in institutionalized organizations. This model is built on key concepts in institutional theories and tested by empirical evidence from SEAs. It provides

a theoretical basis for replicate studies on SEAs or research on other institutionalized organizations.

Last, the multiple sources of information used to address education policies add to the literature of state activism from a longitudinal perspective. Understanding organizational change requires evidence collected across a period of time and speaks to a situation at different time points. This study employs both kinds of evidence that not only compare the snapshots at each time stamp using survey data but also captures the process through multiple interview cases.

Definitions of Terms

Terms used in this study often have varied meanings in different contexts. It is necessary to define these terms so they can be used uniformly and serve the purpose of this study.

Organization and institution are two key terms that need to be clearly differentiated. Organizations are social entities that actively apply institutional rules (North, 1990) and embody institutions through their structure and practice that are largely shaped by resources and power-dependency relationships in a particular field (Meyer & Rowan, 1977; Scott, 1987; Williamson, 1985). The focus of this study is on SEAs as organizations. When organizations are under the influence of multiple forces in the institutional environment or competing institutional objectives, two things tend to happen: (1) they tend to develop more administrative capacity and (2) organizations in the same field tend to become more differentiated (Meyer & Scott, 1983).

The term organizational field refers to a population of organizations holding similar goals, norms and social logics. Organizations in such aggregates constitute “a recognized area of institutional life: key suppliers, resource and product consumers, regulatory agencies, and other organizations that produce similar services or products” (DiMaggio & Powell, 1983, p. 148). Organizational field has also been defined as policy domains, or disputes and issues of concern (Scott, 2008). It can be a battlefield where organizations are seeking to advance conflicting interests and impose their rules of the game on others (Bourdieu & Wacquant, 1992). It can also be a community where organizations coordinate for collective survival (Astley & Van de Ven, 1983). In this study, the field of SEAs consisted of 50 state departments of education and their collaborative organizations. SEAs are regulatory agencies that receive federal and state funding to oversee public education in their particular states. They work with other organizations, such as schools, districts and testing companies, to fulfill their public functions. Therefore, the organizational field for SEAs can be addressed through SEAs and their relationship with other organizations. Data for this study can only sufficiently address a few aspects of the organizational field for SEAs, specifically the internal organizational feature of SEAs as well as the relationship between SEAs and districts and among SEAs.

While an organization field is made up of concrete social entities, an institution consists of unobservable social codes. Bearley and Tolbert (1997) describe an institution as “shared rules and typifications that identify categories of social actors and their appropriate activities or relations” (p. 96). In other words,

an institution is a social perception that defines the role and activities of organizations and is a broad normative concept based on clusters of beliefs and values. Specifically, standards-based accountability is interpreted in this study as an institutional expectation for education that sets goals for institutional rules in education. Such an institutional expectation has not only become gradually accepted and shared by its constituents (e.g., schools, districts, states and federal government) as a normative practice in education, but also shapes each constituent's role, activities and relations with others.

Some theorists also consider organization as a form of institution in the sense that one level of organization (e.g., the U.S. Department of Education) can operate as an institution to another level (e.g., SEAs) in an organizational hierarchy (Jepperson, 1991). In other words, a hierarchical relationship between organizations can be institutional. Different perspectives on how these rules and typifications are associated with individual behaviors, at either a personal or an organizational level, lead to different schools of thoughts regarding institutional theories. In this study, I examine one level of organization in the U.S. education system, namely SEAs; organizational hierarchy is not the major focus. Therefore, organizations are perceived as an embodiment of institutions, playing out and acting upon institutional rules by which they are bound.

Last but not least, I describe the infiltration of institutional expectations into organizations as institutionalization. Institutionalization denotes the process through which the rules and typifications attain a certain state or property (Jepperson, 1991). It denotes how an institutional expectation, such as SBA in

education, becomes widely accepted and exerts its impact on individual perceptions and behaviors about schooling.

Table 1.
Summary of Terms

	Definition	Example
Organization	Social entities that actively play the institutional rules and embody institutions through their structure and practice	The SEA in each state
Organizational Field	A population of organizations holding similar goals, norms and social logics	All SEAs and other organizations they work with to fulfill their functions
Institution	Shared rules and typifications that identify categories of social actors and their appropriate activities or relations	Education
Institutional expectation	Goals of institutional rules	Policy orientation toward standards-based accountability

Legitimacy is another important concept in institutional theories that I use in this study to understand the organizational changes of SEAs. Suchman (1995) defined legitimacy as “a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions” (p. 574). Legitimacy is a condition for social acceptance and credibility that does not directly produce anything but is oftentimes a prerequisite for organizations to have access to material resources and technical information (Scott et al., 2000). In this study, the concept of legitimacy is applied to reflect perceptions of SEAs’ roles and

functions in the U.S. public school education system, which partly explains the motivation for organizational change.

A key term in this study that connects organization and institution is accountability. Depending on the context in which it is used, accountability may have different meanings and can be used synonymously with responsibility, authority, evaluation and control. Richburg (1971) defined accountability in education as “a construct describing the product of an educational process in which an instructional program is assessed as to its effectiveness and efficiency in achieving student learning, and educators are held responsible for the failures and successes of the instructional program” (p. 2). An accountability system also assigns its constituent organizations with specific relationships in a specific institutional environment. For example, SEAs are required by NCLB, a federal law that symbolizes the current SBA-oriented institutional environment in education, to develop rigorous standards and assessments to evaluate school performance. In the meantime, they are under pressure to provide technical and financial assistance particularly to under-performing schools and districts.

Summary

This study is a cross-disciplinary attempt to expand the understanding of institutionalism in education with a retrospective look at the policy shift toward standards-based accountability. Findings of this study may elicit more in-depth conversation crossing the borders between education and other disciplines in social sciences. The changes taking place in state education agencies provide a small window into the world of educational bureaucracy, but open the door to

invite multiple lines of social inquiry in search for more effective designs and approaches to the implementation of education policy. I learned from my previous work on education accountability and policy implementation that the lack of knowledge about education organizations could be a major drawback for translating policy from paper to action. When a policy is designed without fully anticipating its impact on the implementing organizations, it creates a potential contradiction between the institutional environment and the organizations' functioning. As organizations shape the environment for adaptation, policy can be easily diluted and deflected in the process. Recent research on street-level bureaucracy and policy implementation has illustrated this phenomenon (Honig, 2006a). This dissertation advocates for a more extensive application of cross-disciplinary perspectives to draw attention to organizational analysis as a necessary but overlooked step toward a thorough understanding of policy implementation. The use of institutional theories in this study is an attempt to show how such a multi-disciplinary approach may provide new insights about education policy.

Chapter 2: Theoretical Framework for Organizational Change

Different schools of institutional theories have varied interpretations of institutionalization. Some portray an institutional system as a class of elements that account for organizational structure; some define it as a distinct societal sphere (Scott, 1987). Despite their varied emphases, institutional theories of organizations share some recurring themes. For the purpose of this study, I rely on the set of institutional theories that highlights the difference and specialization of institutional logic and activities in a particular organizational field. Research in this orientation not only explains the connection between organizational characteristics and practices, but also explores the rationales and the social conditions for the connection.

Organizations vary along a continuum of environmental influence and managerial power. At one end of the continuum are production organizations, such as factories, with emphasis on output and managerial power, while at the other end are institutionalized organizations, such as public schools, with emphasis on environmental influence and isomorphism with institutional rules, such as policy mandates and professional standards (Meyer & Rowan, 1977). Different from production organizations, the impact of institutionalized organizations cannot be easily measured through their productivity. Institutional rules, to some extent, function as myths to depict “various formal structures as rational means to the attainment of desirable ends” (Meyer & Rowan, 1977, p. 345).

This review mainly focuses on the institutionalized organizations for two reasons. Firstly, SEAs resemble institutionalized organizations and their changes are situated in an institutional environment that is dominated by top-down policy mandates. The outcome and the influence of SEAs cannot be easily quantified. The legitimacy of SEAs as indispensable intergovernmental agencies is an entitlement and not the result of its productivity. However, the entitled legitimacy of existence does not promise that SEAs are competent to meet the expectations of its institutional environment, for example, the current SBA oriented policies. The dynamic of change between the policy environment and SEAs is best captured by research on institutionalized organizations.

Second, the study of institutionalized organizations has wider implications beyond institutionalized organizations and may shed light on the understanding of production-oriented organizations as well. The institutional mechanism is the basis for both conformity and competition that all organizations face. For instance, even production-oriented organizations incorporate elements that are legitimated externally at the expense of efficiency. We can define the criteria for quality and efficiency because institutional rules, norms and beliefs provide templates for the competition mechanism (Clemens, 1997; Orru et al., 1991). Orru and colleague (1991), for example, compared the operation of large business groups in South Korea, Taiwan, and Japan and suggested that the difference among business organizations in each of the three economies is associated with the varied normative perceptions of what constitutes appropriate economic activities.

The connection between educational and institutional theories dates back to Meyer's groundbreaking 1977 article that explores education as "a system of institutionalized rites transforming social roles through powerful initiation ceremonies and ... transforming society by creating new classes of personnel with new types of authoritative knowledge" (p. 61). He argued that the effects of schools on students are subject more to "external institutional authority derived from the rules of educational allocation" (p. 61) than to the internal structure and network of schools. His education legitimization theory brought a new perspective for examining education as an institutionalized system whose function is to legitimize the structure of modern society.

Since then, educational organizations, such as schools, school districts, and community colleges, are often used as examples to illustrate an organization's priority of order-affirming over task-performing in a fragmented but centralized field (Brint & Karabel, 1991; DiMaggio & Powell, 1991; Meyer & Rowan, 1977; Meyer & Scott, 1983; Meyer, Scott, & Strang, 1987). Teaching is evaluated according to criteria of certification; a curriculum is implemented though it might depart from the immediate needs of the students in a class; a department is maintained to validate the legitimacy of a university regardless of its enrollment and graduation rate. The phenomenon of fragmented centralization in education is, for the most part, a result of the dependence of the education system on diverse organizations and social actors with uncoordinated or even conflicting interests. In this study I look particularly at the partnership of SEAs with LEAs to examine

how organizations across levels in the bureaucratic system develop new relationships to respond to changes in the institutional environment.

Drawing from concepts and constructs in institutional theories, this review proposes a theoretic framework to explain changes in institutionalized organizations. This framework helps identify gaps in the literature and guides data analysis in later chapters to address these gaps with evidence from the study of SEAs. The review starts with the background of a paradigm shift in institutional theories and proceeds to explain a selection of institutional constructs that are applied in this study to explain the motivation, process and results of organizational changes in SEAs. A theoretical model is proposed based on these constructs at the end of the review.

Paradigm Shift in Institutional Theories

Classical institutional theories have been cited widely in different fields, but have received the most consistent attention from sociology. Weber's (1947) work on bureaucracy, for example, inspired a later generation of institutional theorists to focus on organizations as units of analysis. Efficiency, calculability, substantive rationality, and technical competency are Weber's essential qualities of an ideal bureaucratic administration. From the Weberian perspective, organizational analysis is a hierarchical sum of its parts with unchanging rules that control human actions.

The rationality and predictability described by the Weber's classical institutional theories, however, often failed to explain the organizational realities. For example, the notion of rationality gives rise to the perception of an

organization as a goal-achieving entity. However, it is often not articulated about “whose goal,” “which goal,” and the distinction between official goals and operational goals. Weber recognized that the assumption of rationality conflicts with reality and recommended that social scientists examine, instead of making assumptions of, such rationality (Swedberg, 1998).

Classical institutional theories are mainly concerned about systematic stability and maintenance of organizations but overlook the dynamics of individual and environmental factors as well as the necessity of organizational change. Expanding upon these classical models, the neo-institutional paradigm examines the logic and logic-in-use and turns increasing attention to practitioners. Neo-institutional theorists argue that institutions are the result of human activities but not necessarily the product of conscious design. Efforts for rationality in organizations often yield unexpected consequences beyond individual control. There is less to rationality than meets the evaluator’s eye because the conditions under which rationality works best are relatively rare in organizations (Weick, 1985). Nevertheless, organizations still need goals to legitimize themselves, deflect criticism and gain resources from the external environment. Benson (1983) uses educational organizations to illustrate such irrationality:

An educational organization, for example, must go through the rituals approved in the environment for assuring legitimacy: hiring a ritually approved staff, offering a conventionally established curriculum and granting the usual range of credentials, that is, degrees. None of these performances assure that a meaningful or substantively integrated educational experience will ensue. In fact, the organization takes pains to insulate its core teaching-learning activity from external evaluation or accountability. (p. 47)

Some theorists highlight the cognitive and normative dimensions of individual behaviors and argue that individual actions are learned and cultivated by institutionalized role expectations and, therefore, are value-laden (Parsons & Shils, 1951). Drawing from cognitive theory, culture theory, phenomenology and ethnomethodology, neo-institutional theories introduce greater complexity to the field of organizational studies and open inquiries into external constraints and influences on critical individual (both person or organization) variables, such as cognition in decision-making (March, 1994), social contexts for learning (Donald, 1991), and symbols as a reflection of internal beliefs and a framework for external interactions (Berger & Luckmann, 1967).

The era of neo-institutionalism often divides the old institutionalism and the new, hallmarked by DiMaggio and Powell's (1991) book, *The New Institutionalism in Organizational Analysis*. While the "old" institutionalism, as represented by Selznick (1948) highlights organizational adaptation, change and uniqueness (Pfeffer & Salancik, 1978), the new institutionalism focuses on inertia, persistence, and conformity of organizational structures and homogeneity of practices and arrangement. Its unit of analysis is persistent organizational practices and its interest is in the quality and reproduction of these practices. The new institutionalism argues that institutionalization tends to reduce diversity in the local environment in its search for homogeneity and stability among its components (DiMaggio & Powell, 1991).

Theoretical Concepts in Organizational Change

Research on changes within and among organizations reflects a break with the rational, bureaucratic tradition and hallmarks a paradigm shift from orthodox to neo-institutional theories. The classical institutional theories are mainly derived from Weber's discussion of bureaucracy as a consequence of economic markets and centralized states and his calculable institutional rules. They perceive organizational change as the sum of individual actions striving for organizational rationality.

Neo-institutionalism, on the other hand, rejects such intentionality of efficiency-driven organizational behaviors and highlights the conflicts between institutional rules and efficiency. Not only does maintaining institutional rules create ceremonial expenditure, but more cumbersome is that the institutional rules formed at the higher levels of organizations are often inappropriate to specific situations at the lower levels. This argument captures the gist of a major criticism to the top-down approach in education reform and explains why policy implementation oftentimes is loosely coupled to the original intentions of the policy (Coburn, 2004). For example, a recent study on the Texas accountability system shows that changes in school practices may well misinterpret the institutional expectation on education accountability and result in an "educational triage" where students with the greatest needs are left behind (Booher-Jennings, 2005). To resolve the inconsistency between institutional rules and efficiency, educational organizations often promise reform in both organizational structure and activities. This partial solution pushes educational organizations further away

from being efficient because it brings increasing numbers of participants with competing interests to shape the institutional environment and fuels the criticism of inconsistency among institutional rules and elements in the system. The public school system is a powerful example of multiple actors involved in decision-making across hierarchical levels. As Meyer and Rowan (1977) illustrated, “if one inquires who decides what curricula will be taught in schools, any number of parties from the various governments down to individual teachers may say that they decide” (p. 356).

Organizations may change for both internal and external reasons. Research on self-initiated, internal change is mostly built on the notion of organizational inertia, which posits that organizations tend not to change as their structure and practices become established over time (Hanna & Freeman, 1984). For market-oriented organizations, organization death rates increase as they make structural changes. Research has provided conflicting evidence about the connection between organizational size and the tendency to change (Aldrich & Auster, 1986; Halliday et al., 1993; Hannan & Freeman, 1984; Huber et al., 1993). For example, Hanna and Freeman (1984) found that larger organizations tend to select their changes. They hierarchically listed four core structural changes in market-oriented organizations, including the organization’s mission, its authority structure, its technology and its market strategy.

Research on external changes mainly emphasizes the impact on organizations from the resourceful, multi-faceted and constantly changing environment (Miner et al., 1990; Singh, 1991). Organizations face both

legitimization and competition challenges from external sources although these challenges vary in composition across organizational fields (Scott & Meyer 1983, 1991). From the neo-institutional perspective, organizational change is a strategy to adapt to the environment that may require learning new rules as well as adopting and creating alternatives to resolve emerging conflicts (March, 1991). Changes can also result from exogenous impediments to organizational functioning and reproduction (Jepperson, 1991). A good example is the desegregation of public schools as the result of the Supreme Court's 1954 *Brown v. Board of Education* decision that declared school segregation unconstitutional. The institutional rules, as stated in the federal law, make school segregation an illegal practice; public schools that used to have selective enrollment had to redefine their functions as public services to all students regardless of their race and ethnicity and make development plans that address the needs of all students. Early neo-institutional research posits a monolithic argument that institutional effects are top-down and organizations are obliged to passively conform to the environment (DiMaggio, 1983; Powell, 1988; Rowan, 1982). Important features of organizational change were identified, but the rationale for why some changes happen and others do not was hardly discussed.

More recent neo-institutional studies recognize that competing institutional rules may help explain why certain changes happen. They extend the theories to address the influence of the institutional environment on organizations from an interactive perspective. Changes in the institutional environment, including changes in governmental regulations, are not simply perceived as

coercive and imposing conformity; instead, they are examined through organizations' interpretation, manipulation and elaboration of the rules (Scott, 2008).

The counter force of passive adaptation to environments provides a new perspective to understand the discrepancy between organizational behaviors and the intention of institutions. This discrepancy resonates with findings in implementation studies that policy implementation is oftentimes loosely coupled with the original intentions of the policy (Berman & McLaughlin, 1978; Coburn, 2004). Weatherley and Lipsky's (1977) classic studies of street-level bureaucrats argue that decision-making is constrained by the rich and diverse knowledge base of individuals. Implementing agents may have very different interpretations of the same message due to gaps in the agents' prior knowledge, their interpretations of their professional responsibilities and their capabilities to perform, which may lead to different outcomes of policy implementation (Spillane et al., 2002). Adaptation research in policy implementation also raises concerns that new ideas can be assimilated into the existing framework of knowledge and practices; implementation may focus on superficial policy features while underpinning rationales are overlooked (Cohen, 1990). What the implementation research does not address is that individual choice of action is not free from organizational influences, such as socialization, on-the-job training and acquisition of conventions that individuals may have been exposed to in their organizations. Individuals are obliged to practices that are perceived as standard because

expectations associated with their roles in the organization are based on the practice of others in comparable situations (DiMaggio & Powell, 1991).

More recent research expanded the earlier conclusions about passive adaptation at the expense of efficiency and decoupling as a result of conformity. Instead of dichotomizing organizational productivity and institutionalization, researchers examined how concepts in institutional theories, such as isomorphism, adaptation and loose coupling, are associated with organizational responsiveness to survive environmental change (Westphal & Zajac, 1994). The rest of the chapter is situated in the multiple perspectives of institutional theories and focuses on a selection of institutional concepts that are commonly associated with organizational change. Specifically, these concepts address four aspects of organizational change in literature, 1) process of change, 2) forms of change, 3) motives for change and 4) consequences of change. A theoretical model will be proposed based on these key concepts to guide data analysis and interpretation in this study.

Process of Change

Change implies process. Institutional theories provide a few important constructs to address phenomena during this process. I discuss two that are particularly relevant to understanding SEAs: loose coupling and adaptation.

Loose coupling. Weber (1947) describes a well-functioning bureaucratic organization as a system of rational, authoritarian hierarchy. However, this Weberian tightly coupled organizational structure is hard to find in reality. In the organizational reality, it is often difficult to pinpoint a single person or procedure

in an organization to blame for a specific mistake. Authority oftentimes does not correspond with responsibility for the daily operation of an organization. The formal organizational structure assumes that “coordination is routine, rules and procedures are followed, and actual activities conform to the prescription of formal structure” (Meyer & Rowan, 1977, p. 342). Empirical studies suggest, however, that these assumptions are rarely true. A CEO may not know the office operation as fully as his or her assistant depending on the nature of the matter. The daily production procedure and technical demand are often accomplished following the informal structures; the formal structure, on the other hand, serves the purpose of gaining legitimacy through commonly accepted structural features (March & Olsen, 1976; Scott, 2008; Weick, 1976).

Loose coupling refers to the independent system within an organization where different work units, while belonging to a connected network, retain their own professional autonomy (Weick, 1976). Weick (1976) identified the lack of coordination and slow feedback loop as common features of a loosely coupled system. Oftentimes informal organizational structures exist that are independent of technical tasks as described in the formal organizational structure, so there are alternative means to produce the same results. The formal and informal organizational structure is an example of loose coupling that reflects independence of technical tasks inside organizations and the organizational unresponsiveness to institutional environments.

In Orton and Weick’s (1990) theoretical framework, loose coupling is a result of unclear connections between means and ends, or a fragmented external

environment. It tends to happen when external environments have diverse demands from the organization or show competing or even conflicting expectations. Institutional theorists developed two levels of understanding of loosely coupled systems. Early neo-institutionalism interprets loose coupling as “ceremonial conformity” (Meyer & Rowan, 1977) that allows organizations to adapt to changes in their environment, avoid catastrophic organization-wide failure and give more room for self-determination to the actors (Weick, 1976). For example, state standards and assessments are often loosely coupled with school curriculum and teaching. This loosely coupled system allows schools and districts to maintain a certain level of local control, so schools may have different approaches to improve student performance on state tests. The variety of school approaches reduces the risk of system-wide failure if the SEA mandates one approach for all schools. This strategic choice approach underscores the organizational leaders’ influence on changing structure and technology to circumvent environmental changes. Therefore, loose coupling often brings about symbolic changes to achieve a social consensus on the meaning of activities, either through interpretation, rituals, evaluation or even in creating physical space.

On a second level, loose coupling may encourage substantive changes in the sense that it develops doubt about the logic of the system. Thornton (2004) defined institutional logics as “axial principles of organization and action based on cultural discourses and material practices prevalent in different institutional or societal sectors” (p. 2). Standards-based accountability is a typical example of an institutional logic that shapes the practices of key institutional sectors, such as

government, communities, and businesses. The loose coupling between state accountability and classroom instruction or between state standards and school context has triggered heated discussion about the effectiveness and the underpinning rationale of the accountability system. When the logic is questioned, consensus can be easily broken down and leave organizations receptive to change (Weick, 1982). A breakdown in consensus gives rise to alternatives that can supplement or replace the existing system; the questioning of the institutional logic also makes these alternatives attractive and promising. Additionally, ceremonial conformity may have significant impact on structural change in the long run. The new offices created and the new personnel hired in the decoupling process inevitably shape the function and the culture of the organization, which in turn results in long-term impact on organizational change (Edelman, 1992; Hoffman, 1997)

For institutionalized organizations, loose coupling in organizational structure and forms may lead an organization to thrive, though it may not be efficient. Formal structures in institutionalized organizations come into being not only through the prevalent rationalized instructional elements but also through the unformulated, taken-for-granted structural elements that are elaborated by the complex network among organizations involved in economic exchange and political management. The elements in the latter are particularly subject to change as the exogenous environment changes. The environment change can be an expanded use of new structural elements in organizations in the field, a new legal mandate or a grassroots reform effort.

While earlier neo-institutional theorists interpret decoupling as a result of superficial changes under environmental pressure, later research studied focused more on why some organizations choose to decouple structures instead of truly implementing changes in practice. Westphal and Zajac (1994, 1998) explored an incentive to reform executive performance pay and found that early adoption of structural reform tends to increase the opportunity of implementation instead of ceremonial conformity through decoupling. The decoupling of policy and practice in education has been commonly observed (Coburn, 2004; Cohen, 1990; Weatherley & Lipsky, 1977). In Coburn's (2004) study of how changes in state policy impact classroom instruction, she suggested that the school practice and policy are less likely to decouple and teachers are more likely to respond to change if the policy has a higher level of congruence with teachers' pre-existing beliefs, sustained and pervasive exposure to teachers, and a normative connotation of what teachers should do.

Adaptation. Compared to loose coupling, adaptation is a change process with less opposition between organization and its institutional environment. Through the adaptation process, organizations imitate and assimilate environmental elements in their structure, and make modifications and alterations to adjust to changes in the external environment (Cameron, 1984). Adaptive changes are different from planned developmental changes initiated by an organization to address its needs; they are the result of institutional pressures that force organizations to conform. This line of research follows DiMaggio and Powell's (1983, 1991) concept of "iron cage" that emphasizes the constraints

institutional environments put on their constituents so that organizational changes are mostly passive response. On the other hand, adaptation is oftentimes mutual. Organizations not only predict environmental changes to better prepare themselves for survival but also continuously interact with and exert influence on the environment to negotiate a balance between their goals and interests and the institution's (Cameron, 1984; Goodman & Kurke, 1982).

Organizations often play an active role in shaping the context by contracting with collective authorities. Organizations rarely do what they are told to do; the changes they actually make can be hardly controlled (March 1991). In a highly institutionalized organizational field, organizations shape their environment in such ways that the demands for them to change decrease (DiMaggio & Powell, 1983). This is because institutionalized organizations tend to have shared behaviors and beliefs that any institutional change may disrupt the routine of operation and change the organization's power structure (George & Jones, 2008). Nevertheless, organizations constantly adapt to their institutional environment for the reward of increased legitimacy, resources and competitiveness (Meyer & Rowan, 1977).

Manipulating the environment is a common adaptive strategy that individual organizations use to respond to institutional pressure (Oliver, 1991). Compared to other types of strategic responses (e.g., acquiescence, compromise, avoidance, and defiance), manipulation relies on collective bargaining through a networking process involving different powers. It carries a bonus that the networking process may improve the organization's public image and legitimacy

(Scott, 2008). Meyer and Rowan (1977) argue that organizations shape their environment to achieve legitimacy either by forcing their immediate relational networks to adapt to their structures and relations, or by building their goals and procedures directly into society as institutional rules.

To explain why different strategies are employed, researchers took different conceptual approaches to examine adaptation. These approaches include population ecology, life cycles, strategic choice, and symbolic action (Cameron, 1984). These four approaches spread across a continuum of power balance between environmental and managerial influence. Of the four approaches, the population ecology approach emphasizes the importance of environment the most. It projects organizational changes as immediate results of a changing organizational field, and the surviving organizations are selected to be compatible with the changes in the field. For example, if the organizational field is updated structurally, organizations have a better chance to survive if they expand the range of activities to make themselves more flexible. If resources run short in a field, organizations need to develop more focused specialization to survive.

The life cycle approach (Mintzberg, 1984) depicts organizational adaptation as a predictable sequence of events, from forming an ecological niche, creating a collective commitment, institutionalizing the ideology, to expanding the structure based on the new ideology. The adaptation takes place as each step is shaped by problems arising from the previous one. Compared with the population ecology approach, organizational leaders have more influence on the adaptation process because they are accountable for initiating each step.

The other two approaches cite organizational leaders' decisions and actions as major causes of adaptive change. In contrast to the first two approaches, this line of research emphasizes inertia and resistance to change; organizational leaders play the role of middlemen to reduce the impact of environmental changes on their organizations. For example, the strategic choice approach suggests that, to adapt to a changing environment, organization leaders use strategies to enhance the legitimacy of their organization to cushion the impact of a changing institutional environment. Alternatively, they expand the areas of expertise or create new areas to increase their competitiveness in response to environmental changes. To a great extent, these two approaches resemble loose coupling as discussed previously.

The literature on loose coupling and adaptation provided two distinct processes of change as organizations respond to their institutional environment. Earlier neo-institutional research portrays loose coupling as ceremonial and symbolic. More recent research uses loose coupling as a measure of organizational responsiveness to environmental changes. Adaptation, by comparison, shows a more conforming and responsive organizational change. This line of research has extended from the description of passive adaptation to the discussion of active organizational involvement in shaping the environment.

Forms of Change

Theorists in the early 1980s had a major dispute over organizational inertia and organizational change. On the one hand, some scholars posited that market-driven competition leads organizations to diversify and diffuse (Barnett &

Carroll, 1995; Child & Kieser, 1981; March, 1991); changes in organizational structure take place when new organizations replace the old (Hannan & Freeman, 1977). On the other hand, the new institutional theorists argue that organizations have constraints and tend to change toward conformity and uniformity (DiMaggio & Powell, 1991). Organizational theorists use the concept of isomorphism to capture organizational homogenization. DiMaggio and Powell (1991) define isomorphism as “a constraining process that forces one unit in a population to resemble other units that face the same set of environmental conditions” (p. 66). Some scholars used isomorphism to emphasize market competition and niche change (Hannan & Freeman, 1977); some perceive it as a byproduct of pursuing organizational legitimacy (DiMaggio & Powell, 1983; Meyer & Rowan, 1977). The connection between competitive and institutional isomorphism is well illustrated in Deephouse’s (1996) study of isomorphism in commercial banks. He found that organizational legitimacy as defined by regulatory and public acceptance tends to increase as competitive isomorphism increases. Though isomorphism can be observed in all organizational fields, it is more important for institutionalized organizations for reasons at both the organizational and field levels (DiMaggio & Powell, 1991). At the organizational level, institutionalized organizations tend to develop great interdependency to distribute and share resources (Aiken & Hage, 1968; Hawley, 1968; Thompson, 1967). School districts, for example, maintained administrative systems similar to the federal system to increase competence in seeking federal funding and to be more adaptive to potential changes in funding policies (Meyer et al., 1987). Such

interdependence helps them survive the uncertainty in the institutional environment and encourages organizational homogeneity. At the organizational field level, a power and status hierarchy dominates the bureaucratic system of institutionalized organizations. The rule-bounded power relationship in the fields provides limited alternative organizational models and, therefore, tends to result in uniformity in organizational structure, culture and practice.

The new institutional theories provide a different set of rationales for the trend toward conformity. The notion of institutional contradiction, for instance, argues that organizations conform to mediate conflicts that occur when material practices and symbolic constructions or other organizing principles are in contradiction (Friedland & Alford, 1991). Others claim organizational conformity is a result of organization leaders learning to appropriate and adjust their behaviors as the institutional environment changes (Hanna & Freeman, 1977). For example, Huff (1985) reviewed a number of school administrations and found that school administrators rely on informal sources across levels within and outside schools to understand their schools and the school environment. Such knowledge from informal sources shapes and appropriates school administrators' leadership role in handling the unpredictable environment. To cope with the unpredictability, school administrators play with possibilities and think through responses to events that may not occur. They tend to manage the premises to shape others' decision-making rather than make decisions themselves.

Huff also observed the discrepancy between administrators' thinking and actions. Sometimes administrators act on more than they know because of the

ambiguities and unpredictability in the organization. Sometimes they are content with partial solutions because, even though they are able to understand an issue in its larger context, they can only act upon a small part of the whole. Oftentimes, a specific action calls for compatibility with several other concurrent issues.

Isomorphism reveals itself in different forms in the organizational change process and each offers a different approach to claim legitimacy. DiMaggio and Powell (1991) proposed a typology that describes three kinds of isomorphism – coercive, normative and mimetic. Scott (2008) elaborated with a similar but clearer set of terms – regulative, normative and cultural-cognitive. A typical coercive or regulative isomorphism can be observed when organizations change under the pressure of government mandates, imposition of standards and legitimated rules. The pressure to change may also come from collective bargaining from grassroots advocacy communities. The pressure in either case can be so intense that change becomes less of a choice than a requirement.

Organizations in the public sector tend to be more responsive to legal and regulatory requirements (Scott, 2008). Coercive change is more visible and can be easily manipulated by organizations as a gaming strategy to deal with regulative pressure. Take Kentucky's state assessment Kentucky Instructional Results Information Systems (KIRIS) for example. The state department administered the state assessment as a response to the policy shift to state standards and accountability. However, between 1992 and 1994, the scale scores of KIRIS in reading increased by 18 points while the state's NAEP reading score decreased by 1 point. The test framework was supposed to test similar knowledge and skills,

but the wide difference in test results showcased how states can game the testing system (Koretz, 2008). The discrepancy between student performance on state and national assessment suggests that states may inflate test results by using repetitively similar test items, excluding students, and changing cut scores and testing programs (Catterall et al., 1998; Fuller, 2004; Fuller et al., 2006; Klein, Hamilton, McCaffrey & Stecher, 2000; McDonnell, 2005).

Normative pressure for organizational change stems from professionalization defined either by formal education or by professional associations. Perrow (1974) observed that professionals who make it through the professional career tracks not only occupy similar positions and exercise similar functions across organizations but also possess similar orientations and dispositions. Driven by status competition, organizations employ professional personnel to prove they are comparable to their peers and, therefore, become more homogeneous in their structure and function.

Organizations also make changes to model themselves on other organizations that are perceived as more legitimate or successful. This mimetic isomorphism highlights culturally and cognitively shared conceptions. Organizations use it to deal with ambiguous goals and uncertain environments or to make up for a limited understanding of organizational technology. Compared to coercive or regulative change, culturally and cognitively embedded organizational change through mimetic isomorphism is less visible but more consequential and profound. Scott (2008) summarizes that market-oriented organizations often choose their reference groups based on geographic proximity, perceived similarity,

social status, shared connections regarding resources, information, and board interlock. The imitations, however, often generate new hybrids of organizational routines and forms, which Powell (1991) calls partial diffusion, as a result of local modifications made in the imitation process.

Organizational isomorphism is believed to promote the success and survival of organizations when their structural elements are defined and evaluated based on externally fixed institutions (Meyer & Rowan, 1977). Although the elements do not necessarily promote internal efficiency, the values of these elements may well be defined in other ways, such as legitimacy. DiMaggio and Powell (1983) argue that isomorphic changes can be predicted based on an organization's dependence on others, the centralization of its resource supply, the relationship between its means and ends, the ambiguity of its goals, and its reliance on academic credentials. Within an organizational field, changes tend to take place in units that are least subject to isomorphic arrangements, namely the periphery of organization fields (Powell, 1991).

More recent studies question the neo-institutional assumption about institutional pressure to conformity. Kraatz and Zajac (1996) studied longitudinal change of liberal arts colleges and found that strong institutional pressure does not increase homogeneity of organizational changes as prescribed by neo-institutional theories. Neither do the low-status colleges make changes to resemble higher-status colleges. Washington and Ventresca (2004) studied three fields of intercollegiate athletics and found that a strategy used by other organizations in each of the three athletics fields does not predict an increasing likelihood that an

organization adopts the same strategy to make a change. This finding challenges the proposition of mimetic isomorphism as suggested by DiMaggio and Powell (1991).

Motives for Change

Institutional literature suggests two main sources of motives for organizations to change: to consolidate their legitimate membership in the field (Dowling & Pfeffer, 1975; Lawrence & Lorsch, 1967; Thompson, 1967), and to boost efficiency and competitiveness for limited resources among organizations with similar forms (Dowling & Pfeffer, 1975; Hannan & Freeman, 1977). For the purpose of this study, special attention is paid to the motivation for legitimacy because it tends to be the main concern of institutionalized organizations. The two change processes, loose coupling and adaptation, serve the purpose of achieving legitimacy more than efficiency although competition also leads to adaptive changes. To a great extent, legitimacy not only entitles institutionalized organizations with resources but also defines their competency.

Classical theories and neo-institutional theories have different interpretations of legitimacy. From the perspective of the classical theories, organizations can achieve legitimacy through conformity to legal frameworks and rational prescriptions supported by scientific evidence (Weber, 1968). Neo-institutional theorists interpret legitimacy with an emphasis on the congruity in goals, structure and procedures between an organization and its environment (Meyer & Rowan, 1977; Parsons, 1960; Pfeffer & Slancik, 1978). As Dowling and Pfeffer (1975) put it,

Legitimacy is a constraint ... on organizational behavior, but it is a dynamic constraint which changes as organizations adapt, and as the social values which define legitimacy change and are changed. (p. 126)

Ruef and Scott (1998) argued that, in highly institutionalized organizations, managerial legitimacy is more important in an environment where organizations are highly interdependent. Technical legitimacy is more important for survival in an environment featured by centralized regulatory and funding control. This argument implies that different environments may result in varied needs for legitimacy. It also highlights the difference between classical and neo-institutional theories. While classical theorists perceive legitimacy as a state that can be measured by quantity, neo-institutional theorists interpret legitimacy as an evolving relationship between organizations and their environment. It is indispensable for both production and institutionalized organizations. For the former, legitimacy may outweigh the organizational stride for economic outcomes to make changes in the field (Dacin, 1997); for the latter, legitimacy is often so merged with the organizations' structures and practices that it becomes part of their function.

Dowling and Pfeffer (1975) argued that organizations achieve legitimacy by adapting their goals and operations to conform to what prevails as legitimate. Legitimacy can also be achieved through altering the prevailing definition of legitimacy through communication, or establishing a public image of legitimacy through symbols, values or institutions. Suchman (1995) named the symbolic approach to legitimacy a strategic approach where legitimacy is perceived as symbolic operational resources that organization leaders manipulate to help

achieve organizational goals. As opposed to the strategic approach that aims at achieving ceremonial legitimacy, an institutional approach achieves legitimacy by shaping constitutional beliefs about the institutionalized environment. It shifts the focus of legitimacy from managerial gaming to the compatibility between organizations and the institutionalized environment. Suchman (1995) argued that organizations achieve legitimacy through conforming, selecting or manipulating the existing institutional environment, and that they maintain legitimacy by forecasting future changes and protecting past accomplishments.

Ashforth and Gibbs (1990) proposed a similar typology for the means by which organizations seek legitimacy: substantive and symbolic management. The substantive management approach includes changes in productive performance, isomorphic behaviors, and resource dependencies. Symbolic management, on the other hand, does not result in changes beyond creating an impression and ceremonial conformity. As organizations make efforts to extend, maintain and defend their legitimacy, the tension increases between the legitimation attempts of the organization and the perceived legitimacy of the organization by the constituents. The authors argued that organizations with low perceived legitimacy have greater need and put greater effort to gain legitimacy. The lower the perceived legitimacy, the more the skepticism regarding the legitimating attempts. Organizations with low perceived legitimacy, therefore, tend to make dramatic legitimation attempts, but the more dramatic the attempts are, the less the perceived legitimacy. This theory of problematic legitimacy illustrates the challenges in pursuing legitimacy. Its propositions focus on challenges faced by

organizations with low perceived legitimacy, but similar to many early institutional studies, the propositions are seldom supported by empirical evidence. The authors did not explain how to measure these comparative terms and to what extent established organizations face these challenges.

The question of how to measure legitimacy has not been well addressed in the institutional literature. Dowling and Pfeffer (1975) recommended that legitimacy could be presented in the writing and other formats of communication that capture values and norms prevalent in the society. They suggested that legitimacy could be examined as a constraint on organizational behavior or as a co-optation in the relationship between organizations and social values. In the context of organizational change, legitimacy conveys what is expected of the organization and sets the boundary of what to change and how.

When examining motivation to change, tenets of classical theories of organizational interests and goals and neo-institutional theories of environmental influence are often intertwined. Brint and Karabel (1991), for example, illustrate how changes in two community colleges are driven by external power and organizational goals. They argue that four-year colleges, the business community, and governmental bodies shape the interests of community colleges. Bounded by the three centers of power, community colleges find niches in their social environment to reduce competition and survive through adaptation. The interests of community colleges are also influenced by their competitive advantage, such as low cost and easy access, and organizational leaders' ideology and status pressure. Brint and Karabel conclude that the institutional interest of the community college

is framed by labor market and managerial capacity as well as status group conflict, demographic changes and new organizational competitors. The authors also point out that “during widely perceived national crisis periods, educational emphases tend to shift from training and allocation to socializing efforts, with a renewed emphasis on ‘common national values’” (p. 354). This point is in line with the classical theories argument that, when social networks either within or among organizations become complex, standardization is called for by both political centers, such as the federal government, and peripheral units, such as the state department of education (Bendix, 1968).

Consequences of Change: Changes in Organizational Field

Changes in organizational field are the consequences of collective changes in organizations. When changes in organizations spread to a larger scale and become a field phenomenon, standard practices in the organizational field change.

The organizational field of SEAs is characterized by a somewhat distinctive governance system. SEAs are intermediate governmental bodies that connect local school communities and the department of education at the federal level. As other state agencies, they enjoy sovereignty to a great extent but heavily rely on local and federal resources. They rely on school systems to deliver services, provide expertise and report student progress. In the meantime, they are constrained by federal laws and funding streams. For example, the enactment of NCLB led states to focus on assessment and the alignment of state tests to state standards (American Federation of Teachers, 2001). As individual SEAs become

more involved in school and develop stronger partnerships with LEAs in the new institutional environment, the field of SEAs has also changed.

Organizational field is a fresh concept to education research; however, it promises a new lens to expand our understanding of educational issues. For instance, Burch (2007) used the concept of organizational field to examine the district implementation of literacy and mathematics instruction reform. She perceived subject areas as fields with different culture and institutional environment that leads to diverse views among district staff of their involvement in the two subject areas. More district staff perceived themselves involved in literacy reform than in mathematics reform but such involvement is practiced in a more indirect way in literacy than in mathematics. In other words, fewer staff perceived themselves as involved in the mathematics reform but those who did participated in the reform effort more directly.

The concept of organizational field broadens the impact of institutional rules from particular organizations to a cluster of organizations. It helps illustrate the adoption of new functions and expertise as standard practices and the development of new relationships across organization (DiMaggio, 1983; DiMaggio & Powell, 1983). As organizations change, the organizational field inevitably changes as well. Scott (1994) proposed a model to explain the interaction between organizations and organizational fields. In his model, change in organizational field is one of the reasons for organizational change. He argued that, as the field imposes norms on organizations, changes and innovations at the organizational level initiate negotiation with the dominant structures in the fields

and push the field to change. Additionally, the institutional imprint on his model suggests that organizational fields resemble their institutional environment and may become part of the institutional rules that directly exert influence on organizations. In the field of SEAs, organizational changes as responses to the federal law are initiated mainly at the organizational level as a result of state sovereignty and the lack of a governing structure. As SEAs have had different organizational structures and practices, the change in the SEA field reflects a changing expectation of standard practices and functions of SEAs.

Institutional rules are supposed to be sources of stability and order in organizational change, but with changes in organizational fields, they can be deconstructed as well. As organizations change structures and practices to adapt to the environment, change in organizational fields often pushes for new institutional forms to meet their needs. Destructuration refers to the process by which organizational changes weaken the beliefs in certain institutions and abandon practices under the influence of these institutions. One example of destructuring is Sine and Tolbert's (2006) study of tenure systems in American institutions of higher education. They found that, between 1965 and 1995, many higher education institutions increased the proportion of non-tenure track faculty and limited the use of tenure in search of a new balance between labor and legitimacy costs. This field change results in a new institutional environment and leads higher education institutions to find new ways other than tenured faculties to defend their legitimacy. Scott et al. (2000) studied the health care delivery system in the United States and identified three variables that may change as the

organizational field changes over time: the types and the numbers of organizations, the institutional logics and the governance structures that guide organizational activities.

Conclusion

Literature in institutional theories provides important concepts to understand organizational change in terms of its processes, forms, motives and consequences. The focus of organizational studies shifted away from behavioral rationality as neo-institutional scholars highlighted the resemblance of organizations to their institutional environment and the importance of relationships between an organization and its external environment. Changes in the environment may result in changes in organizations as well as in logic and standard practice in the organizational field.

Legitimacy and competitiveness are two major sources of motivation for organizational change. In this review I focused mainly on legitimacy because it is more salient in institutionalized organizations. Literature reviewed in this chapter shows that organizations may achieve legitimacy either strategically or institutionally. They may also target achieving different kinds of legitimacy: managerial or technical. The decision on using which approach to achieve which kind of legitimacy is shaped by the environment with which organizations interact. The decision is also driven by the interests of actors involved in the decision-making process.

Neo-institutional theorists emphasize the homogenous pattern across organizations in an organizational field. They tend to characterize the response of

organizations to environmental change as conforming or isomorphic. They argue that isomorphism helps organizations reduce the conflicts in organizing principles and is inevitable as interdependence on resources and technology increases. To conform, organizations may either decouple formal structure and practice for a symbolic change or assimilate environmental elements into their practice for a more substantial adaptive change. Last but not least, I discussed the concept of organizational field and its relation to organizations and institutional environment.

Despite the great contributions institutional theories have made to the understanding of organizations, there has been limited research to build a framework to theorize the process of change in institutionalized organizations. Institutional theories provided important concepts that describe organizational behaviors and their motivations. Drawing from constructs reviewed in this chapter, I propose a framework that depicts the general process and logic of organizational change (Figure 1). Following a neo-institutional perspective where organizational change is examined as responses to changes in institutional environment, the framework addresses organizational change in four aspects – motivation to change, nature of change, process of change and consequences of change. To defend or establish legitimacy in a new environment, organizations tend to conform to the new environment through either loose coupling or adaptation. The adaptive change often leads to more substantive changes in organizations and in the meantime shapes the institutional environment. The mutual adaptive process creates a dynamic relationship between an organization and its institutional environment. As organizations change to adapt to the environment, they negotiate

and manipulate the environment to reach an agreement between environment and organizational goals. The loose coupling mechanism, on the other hand, shields the change initiatives from interfering with the substantive work at the organizational units and, therefore, tends to result in symbolic changes.

In addition to legitimacy, competitiveness can drive organizational change to increase productivity and efficiency. As a contrast to isomorphism for legitimacy, organizations tend to innovate and diffuse to find their unique niche when the motivation for organizational change is to enhance competitiveness. The pursuit of productivity and efficiency requires organizations to adapt to the environment, but this line of research is not explored in-depth in this review because it is mostly applied to production organizations to which resources are not given but closely tied to organizational performance.

As changes spread, organizations collectively shape social values and redefine their field in terms of function and inter-organizational relations. Changes in the field elevate the unit of analysis from individual organizations to a collection of organizations in a specific network that shares goals, resources and partnerships. Field-level changes in turn result in changes in the environment through destructuring institutional rules, which may initiate a new cycle of organizational change.

This model provides a preliminary structure to study organizational changes in SEAs. It will be used as a framework for data analysis in this study and be tested with historical documents and empirical evidence. In the next chapter, I will describe the changing institutional environment of SEAs as federal

policy put increasing emphasis on standards-based accountability (SBA). I will then synthesize research on SEAs' roles in implementing SBA in five domains: standards, assessment, accountability, capacity and relation to local education agencies. Chapter three provides an empirical foundation that supports the neo-institutional argument about institutional impact on the functioning and the relation of organizations. It also sets up the institutional context for the analysis of organizational change in SEAs in the following chapters.

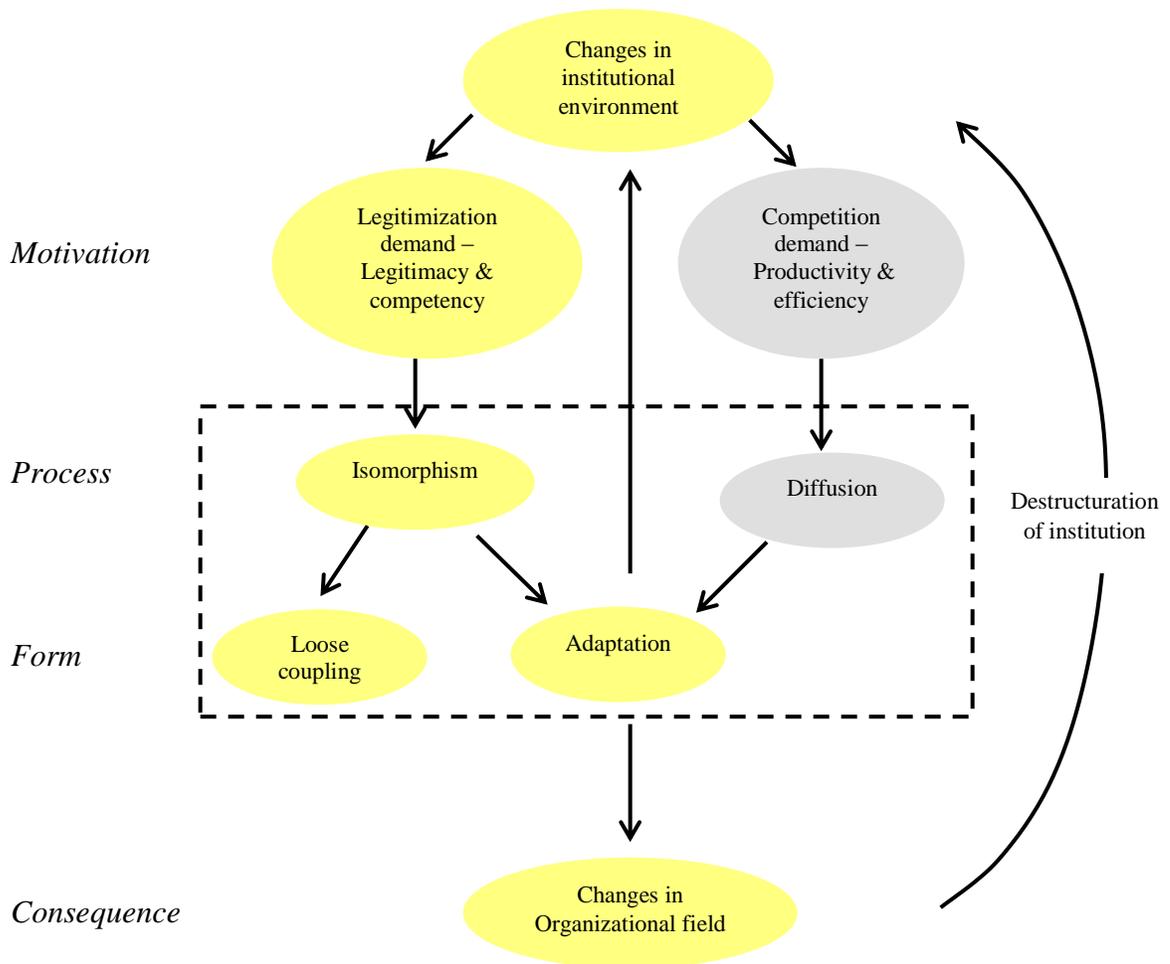


Figure 1. Theoretical framework for organizational change.

Chapter 3: State Activism in Standards-based Accountability Reform

The federal push for standardized reforms has led to many changes in the functions of state education agencies (SEAs) as intermediate organizations sandwiched among local schools, districts and the federal government. The institutionalization of standards-based accountability (SBA) and the emphasis on the role of SEAs in education reform rests on the rational bureaucratic form and the assumed isomorphism of school practices for efficiency. It follows Weber's description of ideal bureaucracy where organizations are goal-achieving entities. Once the institutional goals are defined by the states, school change will follow and effective practices to reach these goals will be implemented, which leads to a general fulfillment of the goals. SEAs are the linchpins that bring the SBA initiative to local districts and schools by designing and implementing accountability measures for which schools are held accountable. The federal-mandated accountability system also requires SEAs to increase contact and collaboration with local districts and schools, which may eventually lead to a new organizational relationship.

To examine changes of SEAs' internal structure and external partnership, this chapter first describes the background of the institutional environment shifts to a standards-based accountability (SBA). Drawing from recommendations in education literature (Finn et al., 2001), it then depicts the roles of SEAs in the SBA system with a focus on four issues: state standards, state accountability, state assessments, and SEA's capacity. Lastly, it synthesizes literature to understand the relationship SEAs have developed with districts and other education entities.

Institutional Shift to SBA

First introduced from business and government arenas in the late 1960s and early 70s, the current SBA movement draws from past experience in systemic reform, standards-based reforms, national standards and accountability. Systemic reform in the early 1990s, for example, called for student outcomes, alignment of policy and policy implementation, and governance system restructuring (Smith & O'Day, 1991). The state education agency (SEA) was proposed to lead the reform to decrease the fragmentation that prevented educational change because it was assumed that SEAs could influence policies related to curriculum, teacher preparation and professional development as well as student assessment. State leadership in systemic reform starts with state standards as a basis for a consistent and supportive policy structure for school improvement. A study by the Council of Chief State School Officers (CCSSO) showed that, by 1995, systemic reform in 47 of the surveyed 50 states included the development of content standards; 38 states were constructing or had already developed student-performance standards (Lindsay, 1995). Goertz and colleagues (1996) studied systemic reform in three states, California, Michigan and Vermont. They found that the Michigan and Vermont Departments of Education had intensified their collaboration with professional and business communities to develop standards and build capacity in schools and districts. This centralized state control over standards and curricular caused concern about local decision-making in curriculum and instruction (Brooks, 1991).

The accountability movement is sometimes interpreted as a shift of focus in education policy from input to output. From the *Brown v. Board of Education* U.S. Supreme Court decision in 1954 to desegregation in the 1960s and 1970s, equalizing education opportunities drove education reform efforts. It gave rise to the attention to equity and adequacy in the distribution of education services and resources. Regardless of the emphasis on education input, NAEP results and research such as the “Coleman Report” (Coleman, 1966) revealed achievement gaps by race, ethnicity and socioeconomic status that continue as a social concern. Some research indicated that the school tracking system assigns a disproportional number of minority students to classes where high cognitive demand subjects were hardly taught (Oakes, 1985). A series of legal cases in the 1980s brought up the issues beyond equalization of expenditures, but also the adequacy of opportunity to learn and the adequacy of support.

Title I, Part A, of the Elementary and Secondary Education Act of 1965 has been used as a major lever for education equity. It is designed to provide financial assistance to schools and districts with a high proportion of students from low-income families. In its early years, SEAs played a central role to oversee Title I programs as the conduit for the federal money. However, little evidence showed that federal input had any significant impact on closing achievement gaps (Borman, Stringfield & Slavin, 2001). The lack of evidence drew federal attention to the operation of Title I programs and the evidence of output. In the 1980s, the pressure from international competition and the release of *A Nation at Risk* (1983) drew increasing attention to the measurable output of

schooling. During the 1989 Charlottesville Summit, national goals were first proposed, but the essential issues of how to achieve them were not followed through. In 1991, the America 2000 education reform plan was introduced that called for a system of voluntary exams called “American Achievement Tests.” Although the bill did not pass in Congress, America 2000 made standards and assessment catch phrases in education policy and further promoted the reform idea that emphasizes education output as measured by student achievement. In 1991, the National Science Foundation announced its \$75 million award, the largest award to individual states until then, to promote state-initiated systemic reform of mathematics and science education programs (West, 1991). Goals 2000 proposed during the Clinton administration revived the national goals at the Charlottesville Summit, asked states to voluntarily develop standards for specific grades, and provided federal funds for state-level SBA reform. This federal reform initiative located its focus at the state level to circumvent the perception of federal intervention to local control of education. This strategic approach to top-down education reform is evidenced in the subsequent reauthorizations of the Elementary and Secondary Education Act (ESEA) and fundamentally changed the role of SEAs as it expands its function as an administrative venue that channels federal funds to schools.

The SBA reform at the state level was further pushed by the Improving America’s Schools Act (IASA) of 1994 that required states to establish challenging content standards in core subject areas in order to receive federal funds. As McGuinn (2006) explains, “(b)ecause all fifty states already accepted

federal ESEA funds and because these funds (unlike the monies in Goal 2000) were sizable, these changes meant that the states would essentially be forced to adopt standards-based school reform” (p. 92). It also required states to develop assessments and benchmarks to measure schools’ adequate yearly progress (AYP).

Reforms in IASA, however, brought neither expected change at the state level nor improvement in student achievement on national tests. By Spring 2002, only 16 states met its requirements (McGuinn, 2006). On one hand, the federal law only encouraged states to make changes without enforcement. On the other hand, many SEAs lacked the institutional capacity in setting standards and developing assessments (Billig et al., 1999). The design of NCLB was largely to address the inefficiency of the statewide reform by adding teeth through its prescriptive accountability mandates. It required states to set standards and begin administering and reporting annual statewide assessments in reading and mathematics for grades 3 to 8 by the 2005-06 school year and science by 2007-08. States were also responsible for overseeing their districts’ identification of needs for improvement and taking corrective actions when necessary.

The focus on state-level SBA reform has been reinforced by the Obama administration. As part of the American Recovery and Reinvestment Act of 2009 (ARRA), the Race to the Top Fund is designed to reward states that “are creating the conditions for education innovation and reform; achieving significant improvement in student outcomes, including making substantial gains in student achievement, closing achievement gaps, improving high school graduation rates, and ensuring student preparation for success in college and careers” (U.S.

Department of Education, 2009). This \$4.35 billion federal fund also tends to help states adopt standards and assessments, build data systems and restructure low-achieving schools. The federal financial incentive allows SEAs to take bolder actions in orchestrating education reform to meet the institutional expectations on accountability and school performance.

SBA received increasing attention in the policy arena partly because it is expected to be able to connect multiple policy mechanisms and align them to common instructional goals. It proposes a system of organizational responsibilities that may answer the calls from both the excellence movement and the school restructuring movement. The emphasis on state standards also seems to convey the promise of equal education opportunities for all students (Fuhrman, 2001).

Standards-based accountability follows an institutional logic that states' expectations for school and student performance would set directions for school practice and student opportunities to learn. The more coherent curriculum frameworks, instructional materials, professional development, student assessments and school accountability are, the better the chances of schools producing desirable levels of student achievement.

Clune (2001) proposes a causal relationship of education policy, curriculum, student performance and reform activities. His analysis of nine Statewide Systemic Initiative case studies shows that "standards-based reform, through its purposeful activities, leads to standards-based policy, which leads to a rigorous, implemented standards-based curriculum for all students, leading to

measured high student achievement in the curriculum as taught” (p. 15). This conclusion, however, is derived from data collected from a particular model that only resembles features of standards-based reform. It emphasizes strategies that promote systemic reform at both school and regional levels.

At schools, the statewide systemic reform was translated into supporting teacher professional development, developing, disseminating, or adopting instructional materials and supporting model schools. At the regional level, the reform was accompanied by aligning state policy, creating an infrastructure for capacity building, funding local systemic initiatives, reforming higher education and the preparation of teachers, and mobilizing public and professional opinion.

Many features of this systemic reform model are arguably weak in the current accountability system under NCLB, such as professional development and infrastructure building for capacity development. Besides, the model was also implemented simultaneously when other standards-based reforms were in effect; therefore, the causal relationship is best understood as partial for the complex factors that contribute to the curriculum change and student performance.

McDermott (2007a) uses the implementation of standards-based accountability in four states to illustrate SBA as an expansion of the moral community in educational governance and a public policy tactic to blame victims of the education system for being “low-performing” and “failing”. Although schools are believed to be responsible for educating all children and helping them overcome social inequality, educators and educational researchers caution that accountability does not guarantee expected results; some argue that schools,

teachers, and students are at one end of the accountability continuum and not the only ones who should be held accountable (Hansen, 1974; McCombs & Carroll, 2005; Sirotnik, 2005). Local and state education agencies need to carry their share of the responsibilities as well.

State Activism

Literature often traces state authority to compulsory schooling laws and district consolidation during the Progressive Era. State education policies were not to oversee school operation but to establish administrative structures to support “the growing professionalization and bureaucratization of local districts” (McDonnell, 2008, p. 2). In the context of increased emphasis on SBA, the rest of the chapter synthesizes research on the role of SEAs in setting standards, establishing accountability systems, developing assessment and building capacities. State activism in these areas reflects SEAs’ struggle for legitimacy and provides the context for understanding organizational changes in SEAs.

Standards

NCLB is not the beginning of the nation’s struggle with standardized reform; rather, it symbolizes a continued, expanded and intensified policy effort that emphasizes standards and consequences tied to assessments. The 1988 reauthorization of Title I included, for the first time, a rudimentary accountability system that required states to set standards for the achievement of their Title I children and to take action if Title I didn't produce results. Later, the Goal 2000: Educate America Act in 1994 pushed states further to establish standards and assessment systems and set the stage for the accountability systems in the

Improving America's Schools Act (IASA) in 1994 and the No Child Left Behind Act in 2001. IASA required states to develop mechanisms to calculate school's adequate yearly progress (AYP) and to establish a "statewide system of intensive and sustained support and improvement" (Sec. 1117) for high-poverty and low-performing schools. However, the alignment of state standards and accountability policies with Title I programs challenged many state and local educational agencies (Goertz, 2001; Sunderman, 2001), and the standards were often so general that staff of local districts and schools could not translate them into curriculum (Massell, 1998).

States set varied standards and followed different processes to create standards (Hamilton et al., 2008; Musick, 1996). McDermott (2007a) illustrates how a similar reform in standards-based accountability in Connecticut and Massachusetts in the 1990s elicited distinct local responses and resulted in diverging state education policies. Focusing on the link between state financial reform and school accountability, Massachusetts was able to push through its reform bill which expanded its SEA's role in school oversight and intervention; Standards-based reform in Connecticut, on the other hand, collapsed after reform advocates were not able to convince the public of the necessity of state testing and accountability to the tradition of local control. McDermott's analysis of the two states highlights the influence of state politics on the standards-based accountability in education as well as the diverse paths of state activism. In line with the loose coupling argument, Finn and Kanstoroom (2001) pointed out that many states intentionally set ambiguous or ambitious standards to avoid

difficulties in reaching a consensus about what to prioritize. Goertz and colleagues (2001) identified three ways states defined goals:

1. the expected level of student performance (e.g., basic or proficient),
2. the percentage of students that must meet the standards, and
3. the length of time schools have to meet state goals. (p. 19)

The first goal definition emphasizes the expected minimum competency while the second highlights the norm performance level. The third is more of an administrative mandate than a reference to students' performance. The different ways of defining goals may bring different consequences to schools and lead schools to follow varied paths to respond to state policy. For example, the first goal often leads to the argument of what should be considered the "expected minimum" while the second type of goal tends to encourage competition among schools and put schools with disproportional low-achieving students at a disadvantage. The third type of goal is hard to set because student performance rarely progresses in a predictable way. If the goal does not match school reality, it will not serve the function of the administrative incentive as it was expected. Some states leave the messy issues of how to align to standards and meet specific goals for districts and schools to decide. Lastly, it is often not clear how states determine if curriculum, instruction or assessment is aligned to state standards. Oftentimes the determination simply relies on "matching each element from one source (e.g., the test) to a similar representation in another source (e.g., the standards)" (Hamilton et al., 2008, p. 13).

Assessment

From the minimum competency tests in the early 1970s to standards-based tests, assessment plays an essential role in expanding state role in education.

Mazzeo (2001) identified three evolving frameworks for state testing policy – examination, guidance and accountability. The examination framework was used at the beginning of this century mainly to select and admit students to high school education when the high school diploma was much less accessible particularly to minority students. The theory of action for this framework is to use tests to motivate students, to provide opportunities for advanced education and to shape teaching and learning in elementary schools. States, therefore, played the role of a change agent that enforced standards and created well-educated citizens.

The examination framework was criticized for bringing resentment to low-achieving students as well as the meager reliability of the test scores. As high school graduation lost its entitlement to elite institutions by the end of 1880s, state assessment policy shifted focus to a guidance framework between the 1920s and the 1960s where states used tests to diagnose and differentiate students. Tests, therefore, serve as detectors of education problems and student capacities. They provide guidance to teaching and learning by informing teachers of data and expect school personnel to act on test results to “correct deficiencies.” States retreat from the active role in public education by limiting activities to providing voluntary assessments, defraying costs and facilitating decision-making at the local level.

The accountability model of state testing emerged in the early 1970s as state legislators and governors began to show interest in the state education systems. Minimum competency tests, for instance, became a popular form of state testing used as a requirement for high school graduation, and the number of states implementing such tests increased from a handful in 1975 to thirty-three in 1985¹. It emphasized the evaluation of schools with rewards and sanctions and the provision of information to both schools and policymakers about student learning. The state assessments are policy mechanisms to motivate students and teachers, mobilize citizens and prioritize certain subject matters. Under this accountability framework, states go back to the role of strong change agents who take actions to intervene in local school practices based on the test results. States expand their facilitative roles as input providers and exert more authority to demand specific education outcomes from schools. Mazzeo (2001) argues that states' accountability testing policy serves as a highly visible symbol of action that leverages their control over instruction and the organization of school systems such as prioritizing the teaching of tested subject areas over untested (CEP, 2007).

In the 2001-2002 school year, all fifty states had implemented statewide testing programs and 17 states used tests with high stakes for schools, such as school closure or reconstruction (Meyer, Orlofsky, Skinner & Spicer, 2002). In the following year, NCLB imposed stakes on schools and districts in all states for student assessments and required schools and districts to show progress, measured by test scores, toward the federally-defined achievement goal. All fifty states are

¹ Information is adopted from <http://education.stateuniversity.com/pages/2501/Testing-STATEWIDE-TESTING-PROGRAMS.html>.

required to report test results of grades 3-8 at the elementary level and one grade at the high school level. Based on these results, states tie rewards such as public recognition and sanctions for schools and turn the high-stakes assessments into political tools of public accountability.

State assessments have become an important part of the administrative system that entitles SEAs with new powers to oversee local districts and schools, particularly in evaluating local school performance and shaping school curriculum. The changing policy environment toward SBA also redefines the legitimate role of SEAs in organizing state assessments aligned to state standards. The new role creates new challenges for SEAs to expand their capacity to function as expected, such as maintaining and reporting data, providing assistance and making data-informed policy decisions.

Accountability

For the past two decades, state accountability systems have shifted from holding school districts accountable for educational inputs to holding schools accountable for student outcomes. The rationale for this shift is twofold: school systems influence student performance, and collective accountability encourages collaboration among school staff (Goertz, 2005). The state accountability system often features the centralization of outcome evaluation and the decentralization of implementation. The decentralization may arise from multiple grounds, for instance, the tradition of local control. The autonomy of local action to achieve state standards helps states circumvent the overwhelming details and diversity of site management, and helps appease the criticism of an increasing federal and

state intervention. The loosely coupled evaluation and implementation system also saves states from taking on tasks beyond their capacities and allows for multiple parties to be involved in the accountability implementation and decision-making process.

The state accountability system represents a fragmented centralization (Meyer & Scott, 1983) where SEAs are not the only power to evaluate and intervene; they rely on the local knowledge and system of LEAs (local education agencies) and schools to sustain their functionality. In the state-defined accountability systems, SEAs rely on schools and districts to provide input, make instructional decisions and attend to the details of site-based management. Centralization of state accountability systems, together with SEAs' lack of capacity, has triggered some criticism on the lack of requirements for states to provide necessary support to enable local schools and districts to meet state standards and expectations (Lee, 2007).

State accountability systems emphasize not only the evaluation of schools with rewards and sanctions but also the provision of information to both schools and policymakers about student learning. By 2001, thirty-three states had state accountability systems and forty-eight states used state assessments as the principal indicator of school performance (Goertz, Duffy, & Le Floch, 2001). These assessments, however, varied greatly in terms of measures of student performance and results reporting. States also had different goals for schools and districts and different types of accountability systems to measure their performances. To reach these goals, states require schools and districts to show

progress in meeting an absolute target, relative growth target or narrowing the achievement gaps. Of the thirty-three states that had state-defined accountability systems in 2001, 24 of them used only state test scores to measure school and district performance. Low performance schools faced state sanctions with different intensity, ranging from mandatory public hearings, developing school improvement plans, mandatory technical assistance to optional transfer of students, state takeover and school closure. The diversity in state accountability suggests that conformity is not the only choice for institutionalized organizations under institutional pressures.

As intermediate governmental agencies, SEAs not only have diverse designs of accountability systems to oversee local schools and districts but also show a spectrum of means to meet federal accountability requirements. Forty-nine states use state assessments to measure student performance; Nebraska requires districts to test in certain grades to measure student performance on state standards. Many states that established accountability systems before NCLB employ dual accountability systems to maintain the state system while complying with federal requirements. Sunderman and colleagues (2005) described the dual accountability system in six states: Arizona, California, Illinois, New York, Georgia and Virginia. They found that, while federal accountability relies on the average test scores, these state accountability measures credit schools for growth in student achievement. For this reason, schools and districts often prefer evaluation based on the state accountability policy.

Capacity

Institutional theorists rarely talked about organizations' capacity when discussing the dynamic between environment and organizations. Literature in education policy suggests, however, SEAs' capacity is a key component in SBA reform, particularly when such capacity is considered as resources aligned with needs for action, and deserves more attention in organizational analysis.

Although districts had the major responsibility for assisting schools, states were required to develop statewide systems for supporting the improvement of schools, particularly Title I schools. The system provided schools with assistance including support in school improvement or corrective action planning, financial assistance, expert assistance in planning and instruction, and professional development. According to a report by the American Federation of Teachers (2001), for the first year of NCLB, an increasing number of states focused efforts on assessment and aligning tests to standards. States developed more instructional materials and incentives to encourage teachers and students, particularly the ones at risk of failing, to meet standards.

The expansion of assessment programs increases SEA costs and the demand for increased capacity. As federal reforms push forward the momentum of states' involvement with accountability, SEAs do not seem to have the institutional memory of building accountability systems and the capacity in tracking student progress over time. Since the 1980s, education researchers have cautioned about the lack of assessment capacity to reliably track students' learning progress over time (Congressional Budget Office, 1986). Regardless of

IASA's efforts to streamline federal education reform efforts, the application of standards-based accountability systems remained limited in practice partly because states did not have sufficient human, technical and financial resources for infrastructure and school assistance (Goertz et al., 2001). NCLB continued pushing states to play a central role in leading school reform efforts, but with limited resources from outside, states had to prioritize certain schools and districts over others (Sunderman & Orfield, 2008). In the beginning years, states did not seem to have developed the capacity and expertise to provide these services; they were constantly criticized for the poor quality of standardized tests, inadequate curriculum and ineffective assistance to districts.

Massell (1998) interviewed SEA staff in eight states and described four strategies to build capacities:

1. establish, support, or rely on an infrastructure for professional development and technical assistance outside the state department of education;
2. adopt standards for professional development;
3. develop more specific curriculum frameworks or pool of resources with examples of how the standards could be applied in instructional practice, and
4. require school improvement planning. (p. iv – vi).

These strategies signified the shifted role of SEAs as regulation monitor to improvement facilitator. Research on the state's role in supporting comprehensive school reform suggests that SEAs have changed their traditional role as

compliance enforcers to more active facilitators of school and district capacity building (Le Floch & Boyle, 2006; Little & Houston, 2003; Lusi, 1997; Massell, 1998).

The shift of roles, however, does not mean SEAs' capacity increases accordingly; instead, a common strategy SEAs use is to turn to external infrastructures to provide direct assistance to schools. The decentralization approach not only helps SEAs ease their tight staffing situations but also allows SEAs to take advantage of street-level bureaucracy by depending on regional institutions and local networks to deliver assistance. The challenge of this strategy is that SEAs have to be able to determine the capacity of the external infrastructure in assisting schools and have effective measures for results.

Research on NCLB shows that these strategies remain vital to SEAs under NCLB. For example, Laguarda (2003) uses interview data to describe the ways in which nine states organize, fund and deliver assistance to low-performing schools. She finds that states deliver the assistance mainly through 1) SEA-based consultants, liaisons, or brokers, 2) school assistance teams, 3) special grants to support school improvement, and 4) special access to the services of regional educational agencies and statewide professional development resources, such as the Statewide System of School Support Centers in California and the Regional Area Centers for Educational Enhancement in Florida. These local education agencies provide training opportunities and workshops that are particularly helpful to low-performing schools. States have similar initial activities to provide assistance, such as ensuring school buy-in, assessing school needs and developing

improvement plans, and providing professional development services. SEAs have different criteria for identifying schools in need of improvement and the intensity of state assistance varies greatly since the reception of state assistance in most states is voluntary. Many states extend assistance to schools that are not identified as in need of improvement, but sustaining support for school capacity building is often challenging for SEAs.

As the stakes for the state accountability increase under NCLB, SEAs are challenged to expand their school assistance to a larger scale, tailor services to the needs of particular schools, and measure the effectiveness of state assistance. At the same time, the lack of funding and staffing for technical assistance provision has loomed large. State data in 2003 indicated that many states did not have the capacity to handle technical assessment issues such as determining AYP and building reliable and valid accountability systems (Sunderman et al., 2005). This study also suggested that few states had a final policy regarding accountability systems that included rewards and sanctions or held schools and local districts accountable for the progress of student subgroups. States did not have the technical capacity to establish test validity for students in special education and English language learners; nor did they have sufficient financial capacity to address school reform issues. Sunderman and Orfield (2008) argued that NCLB has pushed states to a central role in implementing school reform efforts, but with limited federal investment, states are constrained by their capability and forced to prioritize some schools and districts over others. As Goertz (2005) put it, NCLB

exposes disparities in student achievement but does not provide sufficient support for states to address the problem.

Relations with Local Education Agencies

As SBA continued to gain momentum, the relationship between SEAs and LEAs changed, which is an important aspect of organizational change in SEAs. The local control system started to change as states enacted large-scale school restructuring programs that districts could not afford with local tax money. Since the late 1980s, states across the country started increasing funding to education and taking over controls on K-12 education decision-making (Evers, 2001). As shown in Figure 2, in the 1920s states provided 16.9% of funding to K-12 education while the local government provided 82.7%; in the 1970s, the proportion of funding from states increased to 46.9% and that from local government, dropped to 44.0% (Digest of Education Statistics 2007, Table 162). The change in sources of school funding foreshadows the power shifts between state and local education agencies.

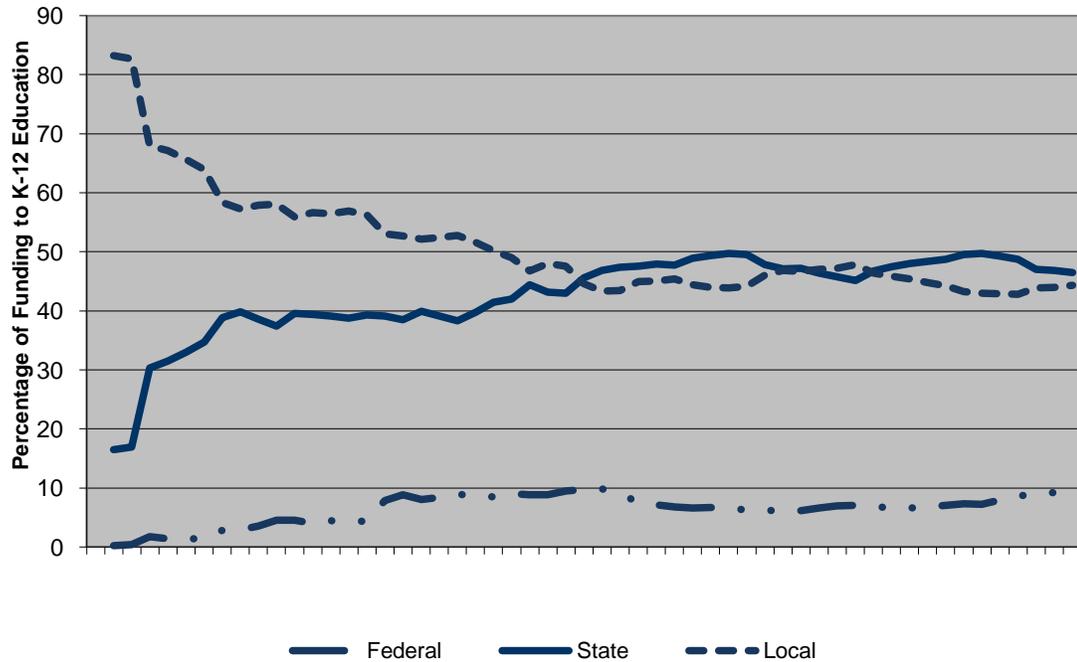


Figure 2. Changes in funding sources for public schools from 1919-1920 to 2005-2006 school year.

SBA is not the only force pushing states' active roles in education. Chubb (2001) argues that the shrinkage of local control over the public school system is partly a result of states' efforts on the massive consolidation of local school districts between the 1930s and the 1960s. During this period of time, the number of school districts plunged from 80,000 in 1950 to less than 15,000 today (Digest of Education Statistics 2007, Table 83). Evers (2001) argues that the consolidation set the stage for states to implement consistent models of governance and administration.

Malen (2003) describes two contrasting views of state activism's impact on local schools (i.e., low- and high-impact view) and suggests that states may influence schools in powerful ways. The low-impact view emphasizes the multiple opportunities for schools to elude state policies. State policies may not

have strong impact on schools because the loosely coupled bureaucratic system creates a space for incoherence in state agencies and local school systems in terms of organizational cultures and structures. The impact of state activism may also be limited because local implementation agencies find ways to free themselves from state directives and bureaucratic control. Lastly, ineffectively implementing strategies may further lessen the influence of state policies.

The high-impact view highlights the multiple ways states exert policy to influence schools by first relinquishing state control through decentralizing and deregulating policies in the early 1980s and then reclaiming state control through performance standards, testing requirements and accountability provisions in the 1980s and 1990s. Malen (2003) synthesizes seven of the most influential features of state policy on schools: curriculum content, use of school time, personnel allocation, professional development resources, educator's workloads, school improvement decisions, normative conceptions of the purposes of schooling, and the legitimacy of governance arrangements. Cohen and Spillane (1992) argue that the relation between policy and practice comes down to "the collisions between ... governance and the consequences in educational institutions" (p. 8). Malen's high/low impact perspective illustrates that the relationship between SEAs and LEAs has been intensified as SBA draws state policies closer to local school administration which poses increasing threats to local control. Both the low- and the high-impact view of the state impact on local schools indicate an increasing power of SEAs and the intensified interaction between state and local education entities.

Despite the constitutional authority states have over the public school system, states are constrained to fully exercise accountability because they lack the critical information from the school and classroom level, such as students' long-term progress and family background (Moe, 2003). Information asymmetries may result in unintended consequences introduced by state assessments, such as decreased student motivation (Betts & Costrell, 2001), increased grade retention rate (Carnoy & Loeb, 2001; Lorence et al., 2002), misidentification or misclassification of student achievement levels (Argetsinger, 2001; Bowman, 2000; Henriques & Steinberg, 2001), and narrowed curriculum (Goldhaber & Hannaway, 2004; Stecher & Barron, 1999).

Limited capacity and gaps in information make partnerships with local government and schools a natural option for SEAs in order to fully play the entitled leadership role. Armstrong and colleagues (2008) observed that many states have developed student data systems to allow LEAs to share student information with SEAs such as student identifiers, program participation, assessment results, and course completion. While LEAs use the information to report to parents and students, SEAs analyze data for state and federal accountability purposes. Many states also developed their own systems to collect student-level graduation and dropout data. SEAs and their LEAs often contract with different vendors to build data systems and to make their data systems transferable.

The expanding impact of SEAs on school curriculum and classroom instruction also requires support from other interest groups. Cusick and Borman

(2002) described how the SEA worked with professional communities to create and revise state standards during Michigan's effort to create a language arts curriculum in the 1990s. This study portrays Michigan's SEA as a mediator of different political and social entities with varied interests and beliefs in public education. The authors argue that state reform efforts rely on collaboration among universities, professional associations, districts and teachers to establish a legitimate policy stand on language arts. The elaborative relationship enhances the SEA's ability to act on legislative mandates particularly when facing external challenges.

Conclusion

This chapter depicts institutional changes that show increasing favor to standards-based accountability. This trend has pushed SEAs to be more actively involved in setting state standards, establishing state accountability systems, developing state assessments and building their capacities to fulfill requirements mandated by the federal policies. From an institutional perspective, state activism discussed in this chapter shows SEAs' struggle for legitimacy in a changing policy environment; it also precipitates organizational changes in internal infrastructures and external networks as SEAs fulfill the federal requirements for standards, assessment, and accountability. A historic review of SBA policy development confirms the neo-institutional perspective on the relationship between organizations and institutional environment. The observation of state activism in the SBA-inclined institutional environment suggests that institutionalized state organizations not only take isomorphic actions but also

develop diffused practices to meet the legitimation demand. Lastly, the development of state capacity and relationship with LEAs implies changes in SEAs' external relationships with other organizations in the field.

Education literature provides a rich resource to understand state policies and their impact on schools and students. However, little has been discussed about how SEAs as implementing agencies adjust for the changing institutional environment. This study intends to fill in this gap in the literature by looking at organizational changes of SEAs from an institutional perspective. In particular, I am interesting in addressing two overarching questions:

1. What changes have SEAs made to play increasingly active roles in the education system?
 - 1.1 What changes have SEAs made in their internal structural, staffing and technology?
 - 1.2 What changes have SEAs made in their external relations?
2. How did these changes take place?
 - 2.1 What factors influenced the changes?
 - 2.2 What strategies were used?

The first set of questions focuses on the *content* of change while the second emphasizes the *process* of change. The theoretical framework proposed in the previous chapter and state activism reviewed in this chapter provide the background for this study and will guide the development of an analytic plan in the next chapter.

Chapter 4: Methodology

This chapter describes the data structure, analysis scheme and methods used to address the research questions raised in chapter three. It starts with an overview of research design that explains the purpose of the study and the rationale for using mixed methods design. I then describe the sources of data and the analytic procedures. I conclude the chapter with a discussion on standards of quality and limitations.

Research Design

Purpose of the Study

The purpose of this study is to understand organizational changes in state educational agencies (SEAs) as responses to the shifting educational environment toward standards-based accountability (SBA). It focuses on both the content and the process of change to test the theoretical framework proposed in Chapter two.

Research in education policy has intensively examined SBA's design elements and effects at the school level as discussed in Chapter three. A recent surge of implementation studies has drawn increasing attention to the process of translating policy to actions in local schools and districts (Honig, 2004, 2006b; Honig & Hatch, 2004; Valli et al., 2008). Relatively little empirical research, however, has been conducted to understand SEAs' experience in the changing institutional environment, which may well be a missing piece to the puzzle of how education policies are relayed across levels in the bureaucratic system and why policy implementation deviates from the original design.

Based on the context introduced in Chapter three, this study uses SEAs as an example to illustrate the impact of institutional changes on policy constituents through institutional perspectives. A number of studies have investigated the implementation practices of educational agencies. However, little is known about how these implementation agencies, especially SEAs, adjust themselves structurally to bring forth these practices and be accustomed to the changing institutional environment. This understanding is particularly important for institutionalized organizations, such as SEAs, because they tend to respond more actively and predictably, compared to production-oriented organizations, to changes in the institutional environment. SEAs' changing experience will shed new light on our understanding of implementing top-down education reforms and what can be done to improve the effectiveness of policy implementation.

This study also tends to reconstruct and theorize the process of change in institutionalized organizations. Institutional theorists have recognized important concepts in explaining organizational behaviors that relate to change but a theory of organizational change that explains the experience of SEAs is hard to find. This study builds on constructs in institutional theories and proposes a theoretical framework to be tested by SEAs' changing experience in this study as well as that of institutionalized organizations in other fields in future studies.

To address both the content and the process of change, this study conducts a qualitative-dominant mix-methods inquiry that draws data from multiple sources including interviews with state officials, surveys in multiple years and relevant documents in public domains. This mixed-methods design helps make

sense of the organizational changes from multiple perspectives and overcome the shortcomings of using either qualitative or quantitative inquiry exclusively. The interview and survey data were originally collected by Center on Education Policy (CEP) for its study on the impact of SBA on SEAs. This study takes advantage of CEP's rich resources on SEAs and asks a new set of research questions about organizational changes in SEAs that are independent of CEP's studies.

Rationale for a Mixed Methods Study

Mixed methods studies involve analysis of quantitative and qualitative data in a single study using both qualitative and quantitative methods (Creswell et al., 2003). A mixed methods approach prioritizes the consequences of research and the importance of the research questions over commitment to the dualistic argument of quantitative versus qualitative methods. It is an application of pragmatism to overcome the paradigm divide that separates qualitative and quantitative methods. Departing from the pursuit of metaphysical truths, pragmatism values "what works" and advocates for the integration of different research paradigms and methods to contribute to the understanding of reality as captured in multiple forms of data. The pluralistic, pragmatic and real-world practice orientation makes mixed methods an ideal fit for the purpose of this study. It allows me to examine the change in SEAs from multiple perspectives and incorporate data from different sources to triangulate, complement, and expand research findings (Greene & Caracelli, 1997).

To examine the change process from a longitudinal perspective, the study integrates interview cases and survey methods with two data streams: interview data with state officials in 2006-07 and survey data with state leaders in 2003, 2004 and 2007. The rationale for using two strands of data is threefold. First and foremost, one type of data is insufficient to fully address the complexity of organizational changes. The survey data include all SEAs but do not provide contextual and procedural information about organizational change. The interview data provide context for the organizational changes of the ten SEAs but results based on the particular context may not be easily generalized to explain changes in other SEAs. The two strands of data accommodate each other to consolidate the empirical basis of this study with increased breadth and depth. Second, the survey data will be used to validate themes that emerged from the interviews with the ten SEA officials and to test the ability to generalize the organizational phenomenon with the interviewed SEAs. Last but not least, the issues raised in the interview data may help critically examine survey responses, identify overlooked areas that call for additional documentation, and raise new questions for future survey studies.

Mixed methods take qualitative research beyond its critical, interpretive framework. In combination of quantitative methods, mixed methods are able to build on exploratory and confirmatory approaches simultaneously to construct a more comprehensive understanding of the phenomenon (Denzin & Lincoln, 2005). The qualitative and quantitative data to be analyzed primarily follow an embedded triangulation design (Figure 3), where quantitative data in the surveys

play a supplemental role, and the interview data and responses to open-ended questions in the surveys will be the dominant source to draw conclusions. Triangulation refers to “the combination of methodologies in the study of the same phenomenon” (Denzin, 1978). The between-methods (between interview cases and survey study) triangulation design in this study mainly serves the purpose of cross validation with comparable documents, interviews and survey data (Denzin, 2009). The integration of data is already evidenced in the data collection stage where all surveys include open-ended questions. The main part of integration for this analysis takes place at the interpretation stage where qualitative and quantitative findings are connected. Data are analyzed concurrently and merged mostly during the interpretation stage.

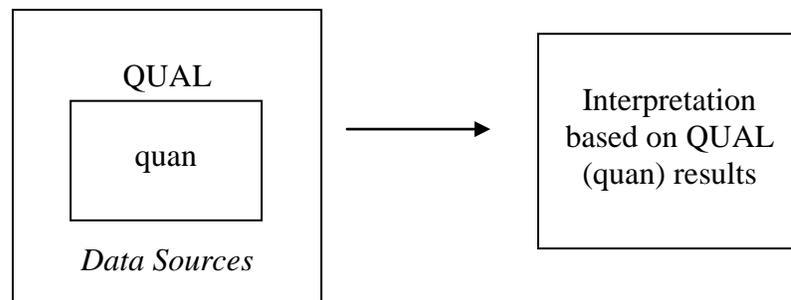


Figure 3. Embedded design using qualitative and quantitative data sources to draw conclusions about organizational change. Interpretations will be mainly based on qualitative analysis with complementary information from quantitative analysis.

Multiple interview cases

The leading source of information comes from interviews with ten SEAs. The interview cases follow the constructivist paradigm with the attempt to generate new knowledge that coalesces around consensus about changes in SEAs.

A constructivist perspective posits that realities are multi-faceted and constructed by both researchers and informants. Emic perspectives from the participants form the basis of local knowledge while the etic perspective from me, the researcher, transforms it with professional knowledge. Therefore, the research is value-laden, dependent on the worldviews and experiences of the interviewees through data generating and my perspectives through data interpretation. I approach participants' input from particulars in the context of each interview case (within-case analysis) and then make connections of these cases (across-case analysis) before making generalizations to the population of SEAs, which is further facilitated by document analysis and multiple year surveys.

Gall and colleagues (1996) distinguish phenomenon and case by defining phenomenon as “the processes, events, persons, or things of interest to the researcher” while a case is “a particular instance of the phenomenon” researchers focus on to understand some aspects of the phenomenon (p. 545). In this study, the phenomenon is organizational changes of SEAs. Ten cases will be studied with a focus on the content and the process of their organizational changes. The cases are bounded by the geographic location of the SEAs and the context of K-12 public school education. In particular, the focus of the interviews is embedded in the policy dynamics five years after the enactment of NCLB when the federal government is expected to reauthorize the law.

Interview cases contribute to this investigation because they address both descriptive questions (i.e., what happened), and explanatory questions (i.e., how it happened). It illustrates a particular phenomenon with in-depth examination (Yin,

2006). The cases are instruments to gain an in-depth understanding of contexts and activities to illustrate a particular phenomenon (Yin, 2006). Together with the analysis of survey data and documents, knowledge about organizational changes is then constructed based on the multiple cases to make the experience of the ten states more transferable to other SEAs.

Survey study

The use of multiple cases in this qualitative-dominant mixed-methods design also guides the exploration of the survey data. Interviews contribute to understanding and theorizing organizational changes through complex and contextually embedded cases. The uniqueness of these cases, however, may lose sight of the bigger picture of the phenomenon and limit the transferability of implications. To make up for this limitation of the interviews, I look into CEP's surveys of SEAs on their experience of implementing NCLB in 2003, 2004 and 2007. Cross year comparison of survey responses may provide direct insights on SEAs' changes when questions are consistently asked throughout the years, but more importantly they provide the national context and trends which interpretations of interview data need to consider.

Data Gathering

This study benefits from having multiple sources of evidence. The analytic framework (Table 2) shows how the theoretical framework is linked to data collection and analysis methods and how different data streams converge to answer the research questions.

Table 2.
Conceptualization of Study Design

Research Questions	Theoretical Concepts	Data Collection Tools
Process of Change	Changes in institutional environment	Interview Document Analysis
Process of Change	Motive for change (Legitimacy or Competition)	Interview
Process and Content of Change	Process of change (Isomorphism or Diffusion)	Interview Document Analysis
Process and Content of Change	Form of change (symbolic in loose coupling or substantive in adaptation)	Interview Survey
Content of Change	Consequences of change (Change in organizational field; Reconstructing institutional rules)	Survey

Qualitative Data Collection

This study relies on two sources of qualitative data – interviews with state officials and documents. In this section, I describe the rationale for state selection, the background of informants and my approach to collect information from documents.

State Selection

The selection of participating states is based on conceptual grounds assuming that commonalities exist in organizational changes of SEAs despite their varied characteristics. The sampling scheme purposively selects states with different characteristics to acknowledge patterns of organization changes in SEAs regardless of these contextual differences. These characteristics include geographic location, school enrollment, the SES of student population, education

expenditure, state budget for education, student achievement and the status of districts making AYP (Appendix A).

The first three characteristics are physical conditions (e.g., location, enrollment, and social economic status) that are irrelevant to the institutional environment but may impact SEAs' decision on organizational changes. The interviewed states spread throughout the country geographically and the numbers of public school enrollment vary greatly. The ratio of Title I to non-Title I schools shows that the average economic status of student population is also uneven across states.

The other five state characteristics are potential institutional factors that may provide contexts for the study of SEAs' changes. Low per-pupil expenditure and a smaller proportion of state budget for education may well limit SEAs capacity to undertake large scale internal restructuring. Low achievement ranking and a relatively large percentage of districts in needs of improvement may tell the urgency of SEAs' need to develop technical capacity to provide assistance to LEAs.

Cases are bounded systems with internal and external features (Stake, 2005). Boundaries of this study specify that the phenomenon of interest is changes, instead of origins and the current status, within SEAs. Many important but less relevant state characteristics were not considered when selecting interview states.

Interviews

In addition to state characteristics, the study is also bounded by the time when the interviews were conducted and the time periods the interviewees worked at their SEAs. The interviews were conducted between February and March 2007 with ten state officials who had years of experience in their current state departments to be able to speak to the changes. Table 3 gives an overview of informants' background that is revealed in the interviews.

Table 3.
Informant Background Information

	Current Position	Starting at Current Position	Prior Positions	Additional SEA staff at Interview	Appointed or Elected Official
State1	State Superintendent of Education in State1	July, 2004	Interim State1 Superintendent (6 months), Deputy State1 Superintendent (8 years), Local superintendent in State1(21.5 years)	No	Appointed
State2	Secretary of Education	July 1999	NA ²	Yes	Appointed
State3	NA ¹	1991	NA ¹	No	NA ¹
State4	NA ¹	NA ¹	NA ¹	No	NA ¹
State5	Assistant Commissioner for the Division of School Improvements	2004	Public school superintendent (15 years)	No	Appointed
State6	Commissioner of Education	1994	State6 Deputy (2 years) State6 Associate Commissioner (2 years)	No	Appointed
State7	Commissioner of Elementary and Secondary Education	1992	School Superintendent (6 years)	No	Appointed
State8	State Superintendent of Public Instruction	April, 2001	School Principal (25 years)	No	Elected
State9	Deputy State Superintendent for Academic Policy	2003	20 years of work in State9 Department of Education	No	Appointed
State10	Commissioner of Education	September, 1995	NA	No	Appointed

² Information is not available.

Interview protocols were developed to explore SEA's responsibility, structural change, partnership with districts and capacity to implement NCLB (Appendix B). The protocols were sent to interviewees beforehand so they could prepare themselves in answering the questions. All interviews were conducted over the phone and protocols were closely followed during the interviews. Some interviews are longer than others, but most lasted for approximately 45 minutes.

Document Analysis

Documents were collected to confirm findings drawn from the interview and survey data. Triangulation with interview and documents informs the study with different interpretations of SEAs' functioning from multiple parties that are not involved in the study. The diverse views illustrate the different realities of SEAs and also inform my interpretations of SEAs' changes.

The documents for this study include government documents, records released on SEAs' websites, and news reports (e.g., Education Week). I also used academic databases, such as JSTOR, and the Google search engine to snowball news entries about SEAs that were relevant to themes identified in the case analysis. All cited documents were organized by topics and stored electronically or in a binder.

Quantitative Data Collection: Surveys

The state surveys were sent to SEA officials of all fifty states in 2003, 2004 and 2007 and had a 100% response rate. Each year's survey focuses on the SEA's role in developing assessment and accountability systems, and assisting

and monitoring schools, as well as their resources and capacities. Unfortunately, the survey questions in each section vary from year to year to different extents, which limits their use as direct sources to gauge changes. Nevertheless, some overlapping questions serve as good indicators of organizational changes across years on a national level. The questions that are not consistent across years were used to provide national context as needed by the interview cases and the document analysis.

The survey also contains quite a few open-ended questions to provide detailed explanations to survey responses. These open-ended responses were examined carefully as part of the survey analysis. In the 2007 survey, specific questions are asked about SEAs' changes. These responses provided great resources to triangulate with the interview data.

Data Analysis

Data analysis in this study is shaped by the mixed methods design discussed previously. Because the rationale for using an embedded design in this study is to triangulate and complement different data strands, I chose to analyze qualitative and quantitative data concurrently before merging findings from the two analyses (Figure 4, adapted from Creswell & Clark, 2007).

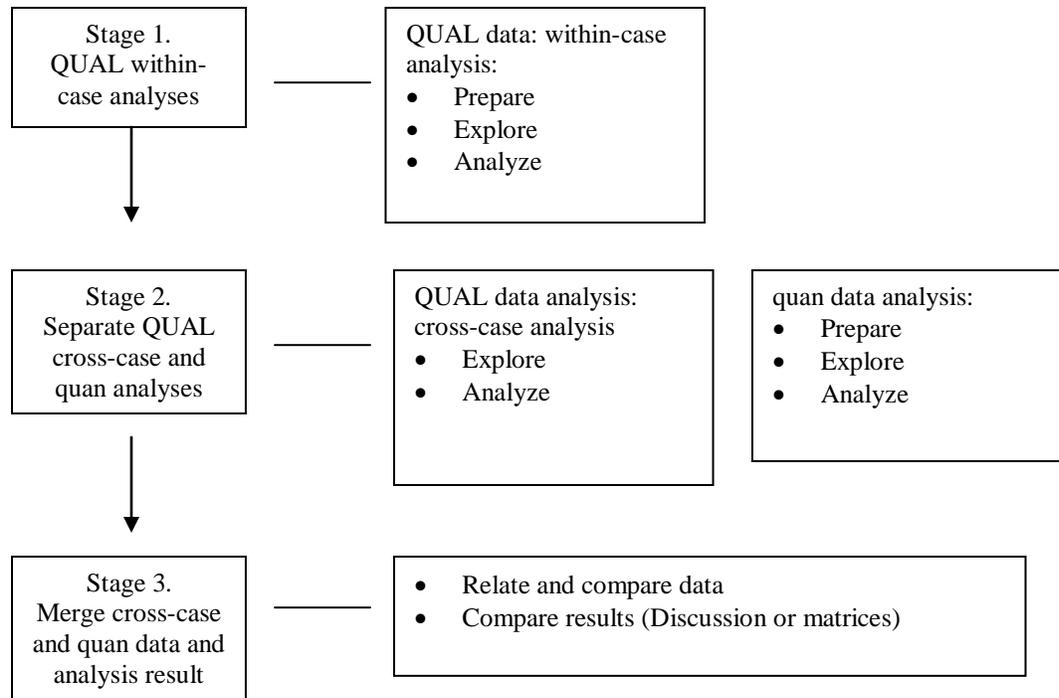


Figure 4. Concurrent Data Analysis Procedure.

Qualitative Data Analysis

The unit of analysis is state departments where interviewees hold positions. Interview data were analyzed using an interpretive approach (Gall et al., 1996) that examines “constructs, themes, and patterns that can be used to describe and explain the phenomenon being studied” (p. 562). The first step is coding interview data.

Initial Coding of Data

Interview transcripts were imported to N-Vivo, software that helps organize and analyze qualitative data. The software assigns numbers to each line of the transcript and then breaks the text into segments. The segment was defined mostly by the interview protocols so each transcript was mechanically truncated

into segments by interview questions. These segments made transcripts easier to organize and analyze. I used a general scheme for initial within-case coding to identify categories where codes could be further developed inductively. Building on Bogdan and Biklen's (1992) framework, I selected to use the following coding categories in the within-case analysis (Table C in Appendix):

1. Setting/context: the larger context of the case (e.g., federal/state policy change)
2. Definition of the situation: informants' perception of SEAs' changes (e.g., SEA's role)
3. Process: sequence of events, flow, transitions and turning points (e.g., before NCLB vs. after NCLB)
4. Strategies: tactics, methods, techniques to accomplish things or meet their needs (e.g., staffing, technology, organizational structure)
5. Relationships and social structure (e.g. SEA-LEA relation, contracting supplemental education services, testing companies)

This scheme helps organize the data more analytically by categories that can be linked to the theoretic framework. Gall and colleagues (1996) define category as “a construct that refers to a certain type of phenomenon” (p. 564). Sometimes subcategories are needed in order to represent different levels of the construct. These categories show patterns of actions or perceptions that may give rise to concepts that help explain the phenomenon. For example, the *setting/context* category includes the interviewees' observation of changes in the policy environment; the *definition of situation* category takes account of the interviewees'

interpretation of SEAs' changes. The categorical coding is continuously interpreted as codes reoccur in different contexts. The thematic codes were explicitly defined in N-Vivo so they can be applied consistently.

It is likely that organizational changes take place episodically and interviewees may talk about changes in different time frames and policy contexts. For this reason, it is necessary to set links between the setting/context and the definition of situation categories, so the categorical coding is not interpreted in isolation but in connection with other codes. This iterative process not only helps with identification of themes in the cross-case analysis but also informs my reflection and interpretation of the themes. Appendix E shows the N-Vivo interface for the within-case analysis.

Development of Themes and Patterns

The cross-case analysis aims at building connections across categories to develop themes. In the process of constructing themes, categories from different cases were constantly compared and revised from domain-centered to a more thematic-oriented, conceptual structure. Miles and Huberman (1994) emphasized that codes should relate in a coherent manner under a governing structure that reflects the theoretical framework of the study. As they put it, “(an) operative coding scheme is not a catalogue of disjointed descriptors or a set of logically related units and subunits, but rather a conceptual web, including larger meanings and their constitutive characteristics” (p. 63). The thematic codes developed in cross-case analysis, therefore, aim to capture salient features of each case and display the underpinning structure and logic of issues raised across all cases.

Miles and Huberman (1996) suggested that cross-case analysis gives rise to key variables that may not be identifiable in single case analysis. Based on the thematic codes in each case I took a variable-oriented approach to look for the patterns of themes across cases. I developed the following codes for the cross-case analysis to connect them more directly to the theoretical framework (Table D in Appendix):

1. Institutional setting (within-case analysis code 1)
2. Motivation for change (within-case analysis code 1, 2)
3. Content of change (within-case analysis code 2,3,5)
4. Strategy of change (within-case analysis code 3,4)

Cross-case analysis looks at both the content of change in terms of internal structure, external relationship as well as organizational functions, and the process of change in terms of motivation, strategy and challenges. Cross-referencing was used as a way to connect the thematic codes in the cross-case analysis. For example, cross-referencing the institutional and organizational changes reveals the motivation for change. It reflects neo-institutional perspectives on organizations as open systems and provides context for understanding organizational change in SEAs.

Code numbers from the within-case analysis are listed next to the cross-case analysis codes to show how the two coding systems are closely related. For example, built on the “strategy” code in the within-case analysis, the cross-case analysis analyzes these identified strategies based on all interviewed SEAs. In the meantime, I use pattern matching as a specific technique to link the identified

organizational strategies and corresponding content changes. Together with the analysis of motives, the strategy analysis addresses the second research question: how SEAs change. Appendix F shows the N-Vivo interface for cross-case analysis.

Analysis of Quantitative Data and Documents

Survey analysis is descriptive in nature. Responses to close-ended questions were entered to separate Excel files by year while open-ended questions were entered into N-Vivo and analyzed as qualitative data. Close-ended questions that are consistently asked across years were identified and tabulated for reporting purposes. Close-ended questions that are unique in each year's survey were connected with themes in the interviews and cited to complement and expand research findings.

Documents were accumulated along with the analysis of interview data to address issues and themes discussed by the interviewees. I summarized the documents to inform the issues from multiple perspectives. Interviewees' accounts were then interpreted and discussed with consideration of perspectives expressed in the documents. Documents were directly cited to provide context for interview case analysis.

Standards of Quality and Verification

Standards of quality for both qualitative and quantitative studies hold true for mixed-methods study. My approach to this qualitative-dominant embedded design adheres to a constructivist perspective where knowledge is constructed from multiple sources and constantly reconstructed.

To minimize research biases, I describe study methods and procedures in great detail in this chapter to clarify data collection and transformation. All informants in this study have considerable years of institutional memory that allows them to speak to organizational changes. Analytic constructs are specified to match the theoretical framework. In the interview case analysis section, I displayed how my interpretations will be linked with specific data and analytical methods.

This study employs multiple sources to provide evidence in different forms so SEAs' change experience can be validated and generalized. Survey responses from many states were based on internal consensus instead of one person's view. Interview transcripts were sent back to interviewees so they could reflect on the questions and revise their answers. The survey responses and interview transcripts were all verified and confirmed by state staff. Documents collected from media, research institutions and academic publications represent outsiders' observations. The insiders' accounts and the outsiders' observation not only triangulate data to check the trustworthiness and the credibility of research findings but also reveal diverse views on SEAs' change.

Limitations

Despite the effort to ensure its quality, this study is subjected to several limitations. First and foremost, the interview protocols were originally constructed to address research questions that did not specifically target organizational changes in SEAs. Additionally, organizational change can be a slow evolving process and the time period reported by the interviewees may not

capture all the features of organizational change. Interviewees may also lose sight of some changes that are constantly in the making as they become accustomed to them in the long process. The protocols would have captured more details if the questions had been formulated and organized following a specific timeline that signifies milestone events that might lead to change. This would have allowed me to examine change strategies through multiple perspectives, such as population ecology and life cycles approaches in understanding adaptive strategies.

This study relies heavily on information provided by the interviewees and survey respondents and lacks direct observation to validate their account. This lack of observational data reduces the power of the study to reveal detailed site-based contexts that may greatly inform the interpretation of SEAs' changes.

The interviews were conducted as part of collaboration between CEP and SEAs. Interviewees might be selected not only based on their years of working experience with SEAs but also for their good relationship with CEP. This relationship may impact the set of issues they addressed and the ways they addressed it. A different group of state officials may not describe and interpret their SEAs' change in the same way.

The survey study also has limitations. As mentioned previously, most of the survey questions of interest had been changed from year to year. Even with questions that were consistent, changes in other questions may impact the responses for these questions as well.

Ethical Issues and Political Considerations

The pragmatic nature of mixed methods has caused ethical concerns about “the-ends-justify-the-means” approach. The attempt to gain knowledge in the pursuit of desired ends continues to haunt the axiological argument of pragmatism. This study uses data that were collected for purposes other than this study, and the research topic was inspired by the data not my intention to build such an argument about SEAs’ change. Nevertheless, my choice of the topic reflects my beliefs in the importance of intermediate governmental involvement in school reform. Such beliefs may well influence my interpretation of the data. As Morgan (2007) put it, “a pragmatic approach reminds us that our values and our politics are always a part of who we are and how we act... (it) would redirect our attention to investigating the factors that have the most impact on what we choose to study and how we choose to do so” (p. 57).

This study’s primary interest is on SEAs, not SEA officials. Interviewed state officials are research instruments for data collection and will remain anonymous and receive pseudonyms. Because they held positions that are highly public and can be easily identified, the names of the participating states will also be anonymous. This will prevent distracting audience’s attention from the generic change of institutionalized organizations to the politics of a specific state.

Chapter 5: Content, Motives and Strategies of Organizational Change

This study examines organizational changes of SEAs to understand how intermediate educational agencies respond to the institutional inclination toward standards-based accountability (SBA) and how they bring about changes in their function, structure and relationship with other organizations. The SEAs' changing role not only illustrates, from a unique angle, the impact of standards-based accountability on the structure of the U.S. education system but also reveals the obstacles to effective implementation of a SBA with a top-down approach. Findings reported in this chapter not only show evidence of organizational change in SEAs as a response to the shifting institutional environment, but also analyze the institutional environment in which organizational changes take place as well as the motivation and strategies.

Findings reported in this section are derived from three sources of data: interviews with state officials in 2007, national surveys of SEAs in 2003, 2004 and 2006, and documents collected from media and SEA websites. The latter two sources mainly serve as supplemental portals to validate themes emerging from the interview data.

The chapter is organized in six parts. The first section describes the changed institutional environment as perceived by SEAs. Then, I analyze SEAs' new roles in the context of standards-based accountability. The third part of the chapter looks at SEAs' change in terms of their internal structure, staffing and information system. Next, I discuss SEAs' external relationship with other entities.

I also examine SEAs' motivation to change and, lastly, strategies they used to bring about organizational changes.

SEAs' Perceptions of the Changing Institutional Environment

Organizational changes of SEAs are situated in a changing institutional environment. The development of SBA policy in the United States, as discussed in Chapter 3, gives a general background for changes in education policy. This section focuses on SEAs' interpretations of the changing environment at both state and national levels and how they impact the way SEAs position themselves in the education system.

At the state level, sensitivity to standards-based accountability has been building among SEAs. In the 1980s, state lawmakers already put accountability under scrutiny (Education Week, 1982; Mathis, 1988) and gradually recognized the incoherence in the state accountability system (Johnston, 1998). Under the influence of state laws and reform initiatives in the 1990s, many states had set up and institutionalized integrated accountability systems (Education Week, 1996 & 1999). State5, for example, started its School Improvement Program in the early 1990s to deliver a comprehensive review of schools and provide accreditation and technical assistance for school districts. By the time of the interview, State5 SEA was going into the fourth cycle of the program. As the policy environment became increasingly performance-driven under SBA, the department consolidated its federal applications so they all were directed toward the purpose of school improvement. California, for instance, passed its reform bills in 1999 raising the stakes for teachers, administrators and students. It followed the example of

Florida that created an outcome-based education system a few years earlier with goals and timelines for schools to implement the school-improvement process and assessment methods (Diegmueller, 1993; Johnston, 1999).

State-wide initiatives are often constrained by the availability and sustainability of resources. When Washington state moved to the outcome-based system in the early 1990s, the state was not able to afford the \$98 million reform, though it gained support from a collection of education groups (Richardson, 1993). Similar scenarios were also witnessed in other states, such as Massachusetts, Ohio, New York, California, Tennessee and Mississippi (Harp, 1991; Newman, 1990). Tight state budgets made school-reform projects expendable as states struggled to keep paying for basic classroom services. Various reasons accounted for the short-lived program funding from states. The fluctuation of state budget is a commonly reported factor. For example, a State7 official gave the following account of a state funding change:

They had an agreement legislatively probably five years before I got here that ... the legislature would fund the [plan] incrementally more each year until the whole bill of the state was 60% state. ... That last[ed] until the special education regulations; they realized that's expensive, and they didn't pay for it. So they started backing off on the state, and they never completed the second round of inspection on the [plan]...because once they started backing off on the state aid, there was a hesitancy to go out and hold [schools and districts] to something that was not paid for.

The significance and urgency of programs also influence the priority of state funding. For example, State5 funded tutoring programs when they first mandated their new state assessments. As the test results improved and the fear of a greater than expected number of students failing receded, state funds for the

tutoring program went away as well. Some SEA officials expressed their concerns about the unsustainable support to state reforms that not only restrained SEAs from pushing reform agendas at full speed but also weakened the conviction that state reform could bring substantial changes to schools. In this context, the enactment of NCLB was encouraging for some states that had tried to push forward the accountability agenda but did not have the means. They were hoping that the federal funds for NCLB would fill the resource gaps for school reform. Unfortunately, they soon became disappointed by the insufficiency of funds from the federal level.

Regulatory changes at the national level are mostly symbolized by the enactment of NCLB in 2002. Before the enactment of NCLB, federal funding and resources to the states were mostly available in special grant programs, such as vocational or special education, instead of in general education programs where mainstream teaching and learning take place (Kaagan & Usdan, 1993). These discretionary resources inevitably required systematic management and oversight at the state level. Although states initiated their reform efforts to provide school-wide programs with local flexibility and increased distribution of resources under the influence of IASA in 1994, NCLB specified a wider range of requirements for SEAs to implement accountability with the goal of bringing about improvement in student achievement at a faster pace. These requirements are reinforced on top of other federal programs that had been in place previously. State officials elaborated:

It is frustrating for us to look at No Child Left Behind and not to be able to look at our responsibilities under IDEA, our responsibilities

under Perkins and have it coordinated in a way that makes it more effective with our resources. ... Because those responsibilities go on but they're pretty much separate, they're not at all informing what we're doing at the federal level.

As NCLB becomes institutionalized, SEAs' workload continues to grow particularly as a result of more schools and districts being identified as underperforming over time. For example, about 70% of middle schools in State4 are in need of improvement even though State4 is one of the states with top performance on the national achievement test, National Assessment of Educational Progress (NAEP). The increasing number of identified districts and schools in need of interventions requires a more significant amount of resources from SEAs. However, many SEAs experienced no corresponding increase in resources to match the increasing monitoring and compliance responsibilities. For instance, the 2004 national survey showed that inadequate federal funds had become a source of challenge for the majority of SEAs to develop (32 states) or implement (36 states) their state assessment systems as NCLB requires.

The imbalance between responsibility and funding results in serious consequences for SEA decision-making. It becomes a top priority for SEAs to strategize their use of money to meet the expectations of state and federal laws. Some spread out the money evenly over grades; others concentrate the funding on the improvement of certain grades, most likely the lower grades. Besides, SEAs have to fund schools with different needs. With limited funding, it is often a challenging policy decision whether to focus resources on schools with the most urgent needs or on the ones that could be in need later if something is not done immediately. The financial pressure of implementing NCLB on both districts and

states was so intense that lawsuits were filed, and a U.S. Court of Appeals in Cincinnati ruled in 2008 that the states and districts need not use their own money to pay for obligations under NCLB, restricting the unfunded-mandates provision of the federal law (Walsh, 2008).

In addition to the increasing workload, SEA officials also found that federal monitoring under NCLB was scripted and did not allow SEAs to be flexible in making adjustments. SEAs enjoyed more discretion under the 1994 IASA and the earlier authorizations of ESEA that were less prescriptive and stringent. Under NCLB, however, SEAs had more requirements to fulfill, less discretion and greater accountability for results. The scripted federal law constrained SEAs to the compliance framework and stifled innovation and creativity that many SEAs consider important for effective school improvement. NCLB's 2014 goal may be a necessary public policy strategy, but many SEA officials do not think it is achievable within the NCLB logic. A State7 official expressed his disappointment with NCLB as follows,

...if you believe standards and testing, it's fine; but if you don't know how to do it – you don't get up in the morning and say I'm gonna do it. ... the development part, best practice, infrastructure development, feedback loops, looking at student work, changing instructional strategies, that part of this equation was never provided.

Compared to states with a history of state assessment and accountability, the impact of NCLB has been even more significant for states with a tradition of strong local control.

The lack of financial and technical support to meet the increasing expectations of the federal law sabotages SEAs' conviction of their capacities to

lead school improvement. However, interviewed officials embraced the leadership role SEAs are entitled to in the SBA policy. While some informants believed that their SEAs would have done what they are doing without NCLB, many questioned the necessity of the federal mandate. As one State3 superintendent put it:

We don't need a new law in this, we need quality implementation. We need to focus more on making sure that every classroom has an effective teacher, that they're working as teams, that they're aligning their curriculum within the school and across the grade ranges, that they have embedded professional development that is effective for them.

Despite the increased workload and stretched resources, SEAs recognize some positive effects that NCLB has created to enable them to become leading agencies in education reform. The federal intervention shifts the locus of confrontation with local districts. For instance, states that had pushed the accountability agenda before NCLB often experienced resistance and pushback from local districts and schools. The compliance role under NCLB redirected the power confrontation to the federal level and made SEAs more aligned with the interests of schools and districts. The entitled role for SEAs to provide assistance also elevated the significance of SEAs in the education system. The institutional changes at both the state and the national levels led SEAs to redefine their function, structure and relationship with other entities.

SEA's New Role

The examination of organizational change of SEAs in this study is bounded by the context of standards-based accountability (SBA) in public education, but the range of SEAs' responsibilities may well go beyond SBA in

public schools to include early childhood and child nutrition programs, professional licensure (such as nursing, architecture, etc.), adult education services, vocational rehabilitation, and disability determination for social security purposes. SEAs' responsibilities vary greatly across states as the structure of the state governance systems differ. For example, State10 has a large intermediate unit system for special education, vocational rehabilitation and school improvement while State2 does not have any intermediary units so that the SEA provides more direct technical assistance and professional development to schools and districts. In this diverse context, I discuss the changing role of SEAs and define the term "role" as the characteristic and expected social behavior of SEAs. I differentiate role from function to emphasize its social subjectivity and perceivedness.

The role of SEAs has changed from what it used to be when SEAs would simply monitor and distribute funds. A State9 official explained that the question that would have been asked twenty years ago was, "Did you spend the money?" Today the question is more probing in terms of how the money was spent to make sure it is directed effectively. One example of such an adjustment is how SEAs changed their way of distributing funding. States changed their funding formulas to tie the money closer to school accountability. A State10 official explained the rationale behind the state funding formula this way,

We analyzed schools that were meeting the standards as measured by the exams, so we know what success costs, and we adjusted that per pupil foundation cost for differences in wealth, really relative concentration of poverty. We made a second adjustment for differences in labor market costs and an adjustment for a fair local share.

The changes in the funding formula expanded SEAs' role to examining schools more closely to understand student composition and performance. To determine resource allocation, SEAs have had to be more knowledgeable about what is taking place in the local school systems.

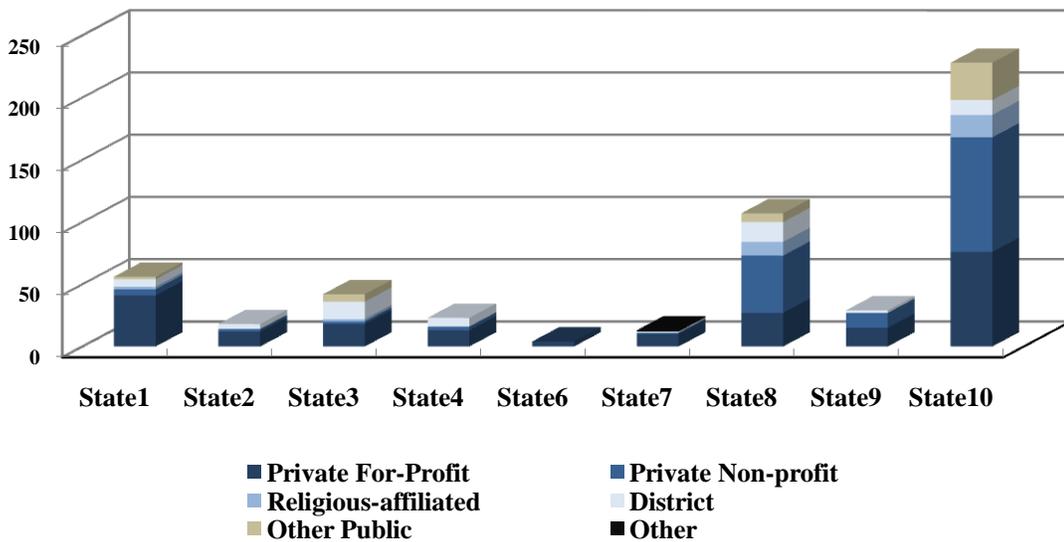
Under the influence of SBA, particularly NCLB, the locus of SEAs' attention has gradually shifted from monitoring financial administration to ensuring compliance with federal requirements and providing technical assistance. The 2006 survey shows that 39 SEAs reported that they had experienced an increase in this federal program compliance requirement since NCLB was enacted. One state noted in the survey that, prior to NCLB, accountability and assessment activities were mainly the responsibility of Title I staff with support from other units. Since the enactment of NCLB, the responsibility has been decentralized within the SEA with more focus on academic achievement of all students. Twenty-eight states reported that they moderately monitor the activities of school districts that had schools in improvement, corrective action, or restructuring status, and 14 reported that they monitor to a greater extent.

Part of the organizational change experience lies in the process through which SEAs balance their compliance role while providing technical assistance. CEP's 2003 survey shows that the 42 states offered professional development programs and 46 states provided technical assistance to schools identified as low-performing in the first year of implementing NCLB. In addition, 36 states established school support teams. The two roles, assistance and compliance, can be so conflicting at times that State4 created a separate unit to specifically handle

the accountability and compliance work. The unit, though independent of the Department of Education, reported to the department whether a district ought to be declared as underperforming or not. The rationale behind the establishment of the new unit was that the accountability and the technical assistance roles were in conflict and had to be performed by two different agencies. The compliance unit was eventually eliminated as it became increasingly unpopular after NCLB, as many more schools were being identified.

To a great extent, SEAs' compliance function is fostered by the increasing federal and state mandates, and NCLB is often considered as the hallmark that signifies SEA's change from being regulatory to predominantly compliant. In CEP's 2006 survey, 39 states reported a moderate or great increase in federal program compliance requirements and the same number of states had experienced increasing federal reporting requirements since NCLB was enacted. Take the requirement of adequate yearly progress (AYP) for example. Some SEAs went through a philosophy change from "don't compare an urban school with a suburban school; they need time to catch up" to holding all schools to the same performance outcomes. In the 2002-2003 school year, the second year of NCLB, 26 states reported that they identified school districts that did not make adequate yearly progress, and the number increased to 36 in 2004 and 42 in 2006. The number of identified districts in a state ranged from 1 to 176. In 2004, 19 states also applied NCLB sanctions, such as public school choice, supplemental services, corrective actions and school restructuring to non-Title I schools that were identified as needing improvement.

SEAs' compliance is also highlighted in meeting the requirements of supplemental education services. Figure 5 shows the composition of supplemental education services providers for nine of the interviewed states in 2004. On one hand, it illustrates the organizational network SEAs worked with to turn around identified schools. Private organizations are major partners while a couple of states also work with districts to deliver services. On the other hand, the large number of supplemental education service (SES) providers suggests the scope of monitoring that SEAs had to carry out in order to fulfill the federal law's requirement. The workload for State10 to oversee more than 200 SES providers seems staggering.



Note: Information for State5 is missing in the survey.

Figure 5. Type and Number of SES Providers in Nine States.

On top of all the monitoring and regulatory work, the compliance role greatly challenged SEA's capacity. Between 2003 and 2004, an increasing number of SEAs reported challenges in monitoring the supplemental services requirement, especially in terms of determining whether provider applicants' instructional strategies were of high quality and effective in raising student achievement. The fast-growing concerns for SEAs included determining if the provider was financially sound as well as giving guidance about pricing or location of services. By 2006, only 10 states reported that they monitored SES providers to a great extent. Insufficient staff and inadequate federal funds were rated the top two reasons for inadequate monitoring. Not only was monitoring SES a time-consuming process that added additional burdens to SEA staff, but it also was challenging to ensure effective communication with so many relevant entities. Unable to fully comply, 48 SEAs made suggestions to the U.S. Department of Education on revising the law's requirements. Forty-seven states successfully negotiated to make some changes to the requirements.

If the impetus for standards, assessment, and accountability has reinforced SEAs' regulatory and compliance roles, it is the institutionalization of these systems that led SEAs to provide more technical assistance to ensure compliance at the local level. In the beginning years of NCLB, lack of state assistance was the biggest issue facing schools. With the increasing number of identified schools, the public expectations have also changed in terms of what the SEA can do and how. The local backlash for evaluation without assistance gradually led SEAs to participate in SBA reform not only as an external evaluator but also as a

contributive change agent to give more substantive assistance to districts and schools. The expansion of SEAs' role has been a contrast to years past when SEAs were defined by a small government philosophy.

As discussed earlier, the policy momentum at both state and national levels has reinforced SEAs' oversight for accountability purposes; soon SEAs took the primary monitoring and regulatory function with participation and input from local school districts. All the interviewed officials expressed their belief that their SEAs had attempted to develop regulations in a collaborative way to make their SEAs more service oriented and client centered. A State5 superintendent, for example, recognized that the transition from a compliance agency to a service provider agency was one of the biggest changes State5 SEA had achieved:

...we've been getting results with sticks. Now we have to start looking at carrots, because our results except for the 10th grade have leveled off. Our work with under-performing schools and districts hasn't yielded many results. We're not going to get it there just by making them give us plans and kicking them, telling them they've got to do this and that. I think there's a shift that's going to go on here at the department, where we're going to shift from compliance ... to more technical assistance and cooperative, collaborative work.

Thirty-seven SEAs reported in 2006 that they put greater emphasis on technical assistance since the implementation of NCLB. A State3 official noted that the addition of the assistance program was the biggest function change in the department. Another state noted in the survey that its department had moved from a compliance mode to providing more expertise and technical assistance as well as leveraging resources with groups that also worked on school improvement. In 2004, 35 SEAs provided professional development or other assistance to help teachers meet the requirements, increasing from 25 in 2003. Forty-two SEAs

reported in 2006 that they were able to provide technical assistance to districts with schools in improvement, corrective action or restructuring to a moderate or great extent. State2 officials pointed out that their SEA has been increasingly perceived as a source of help and support for districts and schools after NCLB,

What NCLB has done... is to create a need for us to be a bit more focused than we were in the past...because of NCLB, we have had to insist that our staff maintain a very strong focus on the supports that are important for our districts and charter schools, as opposed to what would be nice to do, but not necessarily have to do, and certainly not necessarily something that's going to give you as much pay off as we need.

Similar to the compliance role, the technical assistance role challenged SEAs' capacity to meet federal requirements because of insufficient staff and funding from both federal and state governments. Twenty-five states attributed their inadequacy to the increasing number of schools identified for improvement. Figure 6 shows the sufficiency of federal funding for major NCLB requirements reported by SEAs in 2004. Providing technical assistance is the area with the highest number of SEAs experiencing insufficient federal funding.

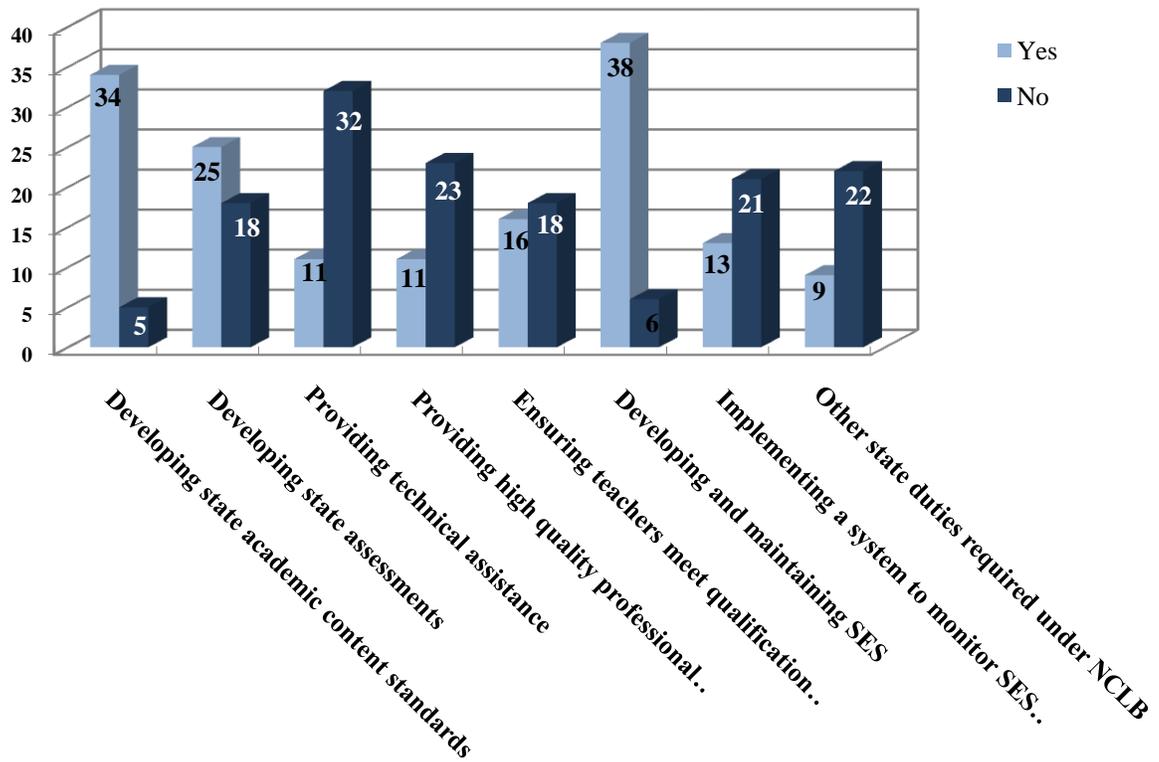


Figure 6. Number of states reporting funding sufficiency under NCLB in 2004.

In summary, SEAs have gone through a role change from being predominantly administrative to being increasingly involved with school practices and student performance, from regulatory to compliance oriented, and from tough-handed oversight and monitoring to actively seeking collaborative partnership. These changes in SEA functions and capacity have grown out of necessity. The following sections take a closer look at the features of change inside SEAs and the relationship with other organizations. Based on these features, the last section synthesizes the strategies SEAs adopted to bring about the changes.

Changes in Internal Structure, Staffing and Technology Structure

Structure

Structural change was almost inevitable in order for SEAs to accommodate new policies and fulfill the expectations of their new roles. In 1995, a survey by CCSSO (Lindsay, 1995) reported that 41 states were already creating or implementing plans to reorganize the state education agency, and systemic-improvement plans in 47 states included the development of content standards. However, public reports or documents do not detail how the internal structure of SEAs had changed over time. In CEP's 2006 survey, a state official described its SEA's structural change using the federal programs as an example:

Prior to the passage of NCLB... the state superintendent led the development of curriculum frameworks. Title I³ [federal program] was a unit in the Office of Technical Assistance whose program administrators worked in isolation from other title programs. ... In 1998, the General Assembly passed a sweeping piece of legislation that changed the rating of schools solely to student test scores on standards-based assessments in grades 3-8 and in high school... The administration of federal funds was in the Division of Curriculum Services and Assessment. [Because] the focus on technical assistance increased for federal programs as schools were in need of instruction support...

The unit for federal program administration continued to float in the SEA until the internal structure took a dramatic turn after NCLB:

In 2001... the work of implementing [NCLB] crossed three divisions – Title IV was in one division, Title II in another, and Title I, III, V and VI in another. ... In early 2005, the Office of Federal Programs broke into a separate office to ensure that aspects of NCLB were administered.

The restructuring of SEAs to manage or administer federal programs showcases how SEAs reorganized their existing structure to meet their needs in the ever-

³ Prior to NCLB, federal accountability requirements were only applicable to Title I schools.

changing policy environment. SEAs also created new branches to respond to the education momentum toward SBA, such as the professional development unit for the institutionalization of teacher tests and certification (State4), or assessment and accountability branches for student tests and performance (State7).

Since the passage of ESEA in 1965, the internal structure of many SEAs has increasingly resembled the U.S. Department of Education because the federal government has become a most important source of funding to Title I schools (McDonnell, 2008; McDonnell & McLaughlin, 1982). The traditional funding centered structure fit the function of channeling federal and state funding to schools but could hardly keep up with the expansion of SEAs' involvement with school practices. In particular, the funding-centered programs often performed overlapping functions, which were not an efficient way to use resources. A State1 superintendent gave the following example:

...after No Child Left Behind came about, our federal program [was]... going and helping Title I schools and then our Classroom Improvement section, which is all state funded, they were trying to go and help in their way. And we were kind of stumbling over each other and it was very awkward ... the federal program people may go on Monday and then the Classroom Improvement people go on Thursday and they'd say, "Well, you know, so-and-so was just here Monday," and it was just awkward...

These programs also made the staff tied to a particular funding source hard to redeploy. SEAs had to stay faithful to the funding source and meld all of the resources together so they did not have audit exceptions. The internal reorganization consolidated funding, expanded the SEA role in providing assistance, and shifted its function from funding-centered to task-centered. As Kaagan and Usdan (1993) argued, SEAs in the 80s were organized "too much

around federal-funding streams, rather than around carefully identified and legitimated functions necessary for improvement of schooling within their jurisdictions”. In State4, divisions in the SEA were created to manage specific funding streams, such as vocational education and teacher certification. After the state’s Education Reform Act in 1993, the department redefined the focus and the scope of work with four new branches: 1) administration, 2) standards and assessment, 3) teacher quality, and 4) school and district accountability. The new organizational structure matched well with the SBA framework and allowed for more flexibility for the department to accomplish goals across units. The current organizational chart on the State4’s website shows three divisions under the commissioner’s office, 1) administration and finance, 2) learning, leadership and information, and 3) accountability, partnerships and assistance. The structural change reflects not only the spirit of state initiatives but also collaborative networks between the SEA and other constituents in the education system.

Internal reorganization also helped SEAs stretch their capacities and enhance their administrative efficiency to meet the increasing needs from both state and federal accountability systems. The Noah’s Ark approach, as the State1 official described it, covers too much of everything, and SEAs are not able to meet the needs of accountability anymore. One state noted in the 2006 survey that, during the last ten years, the administration of grant programs had been consolidated to one central grant administrative area for more efficient coordination and grant processing. In State6, the department trimmed down its middle management and revamped its organizational hierarchy, reducing its

layers of operation from 30 to 6. The goal of the restructuring was to achieve better and faster internal communication as well as distributed leadership. As its structure became flatter, the SEA enjoyed the benefits of flexibility in maneuvering resources to address the needs of state and federal mandates.

Last but not least, SEA restructuring was an effort to increase collaboration across departments and to reduce single strands of work by a particular individual or work group. In State10, for example, the K-12 structure was changed from a stand-alone operation with silo programs, such as vocational rehabilitation, special education and higher education, to a P16 strategy where the SEA builds connection among programs through a series of regional meetings and an education summit. A State6 Superintendent commented that the federal pressure to implement NCLB had produced a culture of teamwork within his SEA.

So it was too easy to abdicate to that person to say, well, it's your job; it's not mine. So No Child Left Behind became everybody's job. And that's the way we do things as things like that come along. We do cross-group work teams and the work gets done in a group. And we use an adaptive work process, if you want to call it something, where we create the solutions in cross-group teams.

The effects of restructuring internal collaboration have been most significant for the federal programs unit that used to be operated mostly autonomously and in isolation from other units in the SEA. Under NCLB, the federal requirements have expanded and the unit had to collaborate to a much greater degree with other units such as teacher licensure, assessment, English language learners, and both information and management services.

Staffing

The reorganization of SEAs has inevitably led to changes in staffing to satisfy the needs emerging with the new structures, shifting resources and the remaking of politics. The political push to decrease government size has influenced the resources and the number of personnel at SEAs. An Education Week survey found that 27 SEAs had fewer employees in 1998 than in 1980 (Education Week, 1999). “Every new governor that comes in has wanted to be able to say that they reduced the number of state employees,” says the State³ superintendent who witnessed the number of staff in his department decrease from 920 to 660 over the past 16 years, including the elimination of regional service centers. State⁴ underwent a departmental reorganization in the late ‘80s during which all the regional centers were closed down and SEA staff was cut in half. Since the Education Reform Act, the SEA has slowly grown, but it has not been commensurate with SEA’s increasing responsibilities. The number of SEAs reporting an insufficient number of staff to carry out the legislative requirements of NCLB increased from 38 in 2003 to 44 in 2006.

The 2006 survey also showed that 46 SEAs reported an insufficient number of staff to provide technical assistance to identified schools and districts. The number of SEAs reporting inadequate in-house expertise increased from 25 in 2003 to 32 in 2004 and 2006. One state official noted in the 2006 survey that, as the result of decentralization of personnel and service in the department, the number of personnel at the state level to provide technical and content expertise for core curricula decreased considerably. The limited state administrative budget

had not been able to fund the positions required to carry out its responsibilities. The professional staff for the statewide testing program decreased by 50% while the number of tests tripled after NCLB.

The economic condition of states also contributed to the downsizing. Many SEAs experienced flat funding before and after NCLB while there were increasing loads of responsibilities from state and federal mandates. One SEA noted in the 2004 survey that since 1998, state budget cuts and other realignment actions had reduced its staff from about 2,000 to 284. Another SEA reported that the department had less capacity than in the 1990s. There was a 39% staff reduction between 1991 and 1996 and an additional 4% reduction between 1996 and 2006. Individuals had to be responsible for implementing multiple state and federal programs. As most of the federal funding went to districts and schools, it was common for SEAs to report insufficient state funds to provide for the necessary monitoring and professional development to fully implement the law.

On the positive side, the reduction in full-time employees forced SEAs to be more effective and efficient. One state noted in the 2006 survey that the caliber of state-level employees had improved with training and experience. In certain positions, however, the staff at times could be overwhelmed with their assignments that used to be handled by more employees. In State7, for example, less than 100 state-funded positions, which are 3% of all state employees, administer over 40% of the state budget. A State5 official described staff burnout as particularly significant in curriculum work, which is time consuming and labor

intensive. The curriculum unit was expected to conduct the same amount of work with fewer full-time employees and less financial resources.

Some states commented in the 2006 survey that the state department was less effective in offering LEAs technical support than it had been because staff had to spend their time monitoring for NCLB compliance and completing federal reports. One state wrote,

The SEA staff spends much more time reporting and negotiating with the US Department of Education today compared to ten years ago. Ten years ago we had more time to spend assisting education with instructional strategies and best practices. Now we must cover all the compliance issues and do not have the resources in terms of time and staff to address the quality of education.

The roles of the federal program personnel that had been providing instructional support changed to a focus on administration of the law and compliance monitoring. A couple of states pointed out that the SEA in-house staff was more limited to administrative functions that needed less substantive expertise to assist LEAs. The responsibilities have grown more specific as NCLB provides scripted direction and guidance to education initiatives. As a result, staff is more focused on supporting the systems through compliance than in providing information on specific issues that emerged from local schools and districts.

Many SEAs managed the downsized staff by contracting out eliminated positions and loaning district staff or external contract consultants. The contracts were able to accomplish the work but were more economical in the long run because they were task-based. A State9 official explained the situation this way,

So the jobs have gone up and we have dealt with it by maintaining the same number of [employees], but then hiring in contractuals, ... [and] a number of people in what we call reimbursables or educators

on loan from local school system. So they'll maintain their local standing in the local system, but then we would pay their full salaries and benefits package. So money that we might have had as operational money for programs is now used instead to buy the expertise.

The staffing change is not simply a story of downsizing, but also the change of staff composition and responsibilities. In light of NCLB, some SEAs had a decrease of administrative staff and an increase of staff for the data collection, reporting and information technology development and maintenance. State6, for example, doubled the staff at its data center while its overall staff size decreased.

Facing increasing data system and management needs in the accountability system, many states had to use contracted consultants to fill in these positions. A State3 official explained as follows:

... we've got a student information system. And then we've got other systems we're working on that deal with like a knowledge management portal that is an instructional tool for teachers. So we've had to use some vendors for certain larger projects... and then we also contract with some folks to help us because the reality is, people who are really savvy with technology market as such that you can't afford them on state government salary schedules.

The state data systems continue to expand as SEAs integrated more technology in their work, but the availability of competent staff is often hard to find at the state salary scale. The challenges to find expertise lead SEAs to contract out for staffing to help build data systems as well as conduct massive training projects in the local districts on how to use the data.

SEA Data System

When it came to organizational changes within SEAs, the setup of statewide data systems oftentimes was the first thing state officials talked about. It became a major focus of the state to analyze the ramifications of data related to school performance and student achievement. The increasing focus on technical assistance also called for developments in technology and the building of comprehensive student information systems. The availability of more student-level data allowed SEAs to provide a greater level of technical assistance to schools.

The data systems vary greatly across states in terms of their history, focus and structure. Some states have had data systems since the 1980s and 1990s; some started building state systems as a response to NCLB in 2002. For the latter states, there were more struggles in changing the organizational technology and keeping abreast with other states in fulfilling the federal requirements. For states that have had a history of standards, assessments, and accountability, their data systems also went through technology and content upgrades to meet the requirements for data dissemination and use or to align with the newly developed academic standards, assessment regimen, accountability and teacher quality indicators as well as the state funding schemes. For example, a State6 official described their old data system this way:

All of the data that we used to collect was done by hand. In other words, they [schools/districts] had to send us the data then we'd have to enter it into a data system. You couldn't manipulate it; whatever form it came in was the form you had to use it in. Ninety percent of it was absolutely useless.

While NCLB required SEAs to beef up these data system, even more data were collected. State6 upgraded its data system and set up a student record system so that schools were able to enter the student records for SEAs to aggregate reports.

The electronic data system allowed the department to define and standardize data collection and to easily share it with schools. A State10 official gave an example of how electronic data made a difference in his department:

...basic state aid input data are done electronically and not on a paper basis. If you complete a college preparation program for a teaching license, your records are transferred electronically and your license comes back in a day or two. You can, as a parent, check to see if your child's teacher is certified. You can reregister for your professional license with a credit card. We have very good supply and demand data for teachers and in various regions of the state, so we know where there are shortages and where are surpluses.

While the electronic and unified data systems enables SEAs to collect data more efficiently, SEAs still heavily relied on schools and districts for data quality and accuracy because coding and data entry were completed at local levels. Whether common definitions were used for data coding and entering may directly impact the quality of state data. A study by Reidenberg and Debelak (2009) warns that the information transfer process from local to state agencies needs more actions to safeguard sensitive information in student records and follow federal privacy laws.

Since the passage of NCLB, all states have set up data systems to report on student performance, but the systems often have different scopes and levels of sophistication. SEAs continue to make changes to improve the effectiveness of their system through student identifiers, teacher identifiers that link to student data,

and p-16 data systems. State2 officials described the growth of their data system as follows:

We used to only use the data that the department had and that's what we reported. Now we have our schools give us much more information and we report much more comprehensive data, but we do have a statewide data system. We have a pupil counting system. We have educator data. We have a little bit of financial data, a lot of information about our schools in our district as well as the department.

In particular, the student identification system caught SEAs' attention because it has the potential to help SEAs address issues related to graduation rate, student mobility, and long-term trends in student achievement. As of 2009, data systems in all but two states had student identifiers to measure academic growth across years and different databases (Data Quality Campaign, 2009). The report showcases the improvement states made to their data systems particularly in respect to their longitudinal measures and suggests one catalyst for the recent change in state data systems is the American Recovery and Reinvestment Act, which requires states to track student achievement longitudinally to be eligible for receiving the State Fiscal Stabilization Fund. The report also shows that only 24 states were able to match students with their teachers through teacher identifiers. As the federal funding through the American Recovery and Reinvestment Act continues, more states are taking actions to link the K-12 and postsecondary education system. According to a survey by Data Quality Campaign (2009), the number of states reporting the ability to match student records between P-12 and postsecondary systems to measure college readiness increased from 12 in 2005 to 31 in 2009.

SEAs also changed their way of disseminating and using data. State data have become more publicly available for analysis and the ownership of the data has moved from a handful of SEA staff to a wider range of users within and outside of SEAs. SEAs now have greater ownership of the data as well as a stronger understanding of how important it is to apply the data in thinking, planning and measuring outcomes. Given limited resources, however, SEAs sometimes prioritize resources for collecting certain data, such as data involved with assessing low performance schools. At the time of the interviews for this study, some states were still struggling to build a robust system to organize data in an easily accessible way. “They [local schools and districts] have to sort of hunt and find.” said a State4 official, “We collect huge amounts of data, but we don’t turn around and make it useful... it’s absolutely a shortage of resources.” Even states with a history of collecting data did not necessarily do a lot with the data either within the department or with the districts and schools. A study by the U.S. Department of Education (2009) shows that state data systems are not informative to classroom instruction as district systems and “the hoped-for efficiencies to be gained from integrating data system at the state, district and school levels are not apparent from the vantage point of schools and districts” (p. 45). According to a survey by Data Quality Campaign (2010), only 10 states were actively sharing progress reports on student record with teachers and only 17 states provide longitudinal measures for public access.

Changes in External Function and Relations

Kaagan and Usdan's (1993) characterized the tension between SEA and other state and local entities as follows:

- ...it is politically fashionable ("correct") and all too common for elected officials in states to "bash" state education agencies, while at the same time not committing the resources necessary to improve them.
- ...legislators are traditionally very loath to put dollars into "bureaucracy" when there is the option of putting them into local aid to directly benefit local constituents.
- ...almost universally state-government practices in the areas of personnel and budgeting severely disadvantage a state education agency bent on supporting innovation in schools and communities. To be blunt, these practices routinely deprive state education agencies of the ability to recruit and retain highly talented people with strong substantive backgrounds in areas like research, planning, and evaluation.
- ...the funding of many state education agencies comes in large part from the federal government, not state governments, with some ratios hovering at 90 percent federal, 10 percent state.
- ...the danger of "no win" internecine conflict between local- and state-based educators in some jurisdictions is real, with the former, particularly those from affluent, politically influential suburban districts, especially resentful of the intrusiveness of what they perceive to be less competent state-agency officials. (para. 10)

The list gives a glimpse of how SEAs struggled and competed for power and resources in the early 1990s while serving as intermediate organizations. The changing policy and institutional environment toward SBA have highlighted the leadership role of SEAs. Some states in this study reported that it was particularly tricky seeking a balance between being a helping hand for school improvement and a heavy hand to implement state and federal regulations. In this section, I take a closer look at the changing relationship between SEAs and local school districts, other branches of state government as well as the U.S. Department of Education.

Internal organizational changes discussed previously are, for the most part, expansions built upon existing organizational conditions. In comparison, the widespread change in SEA's provision of technical assistance features a new external function of SEAs that were not in existence before the SBA era. When working with districts, SEAs shifted the focus of their functions from the administrative aspects of school district finance to school operation and student academic performance. Compared to state intervention in the '90s when SEAs were more likely to take over school districts for disarrayed financial and management situations (Education Week, 1988), they are now more likely to take over districts for academic reasons. A report by Education Week (1999) shows that SEAs increasingly intervened in local schools with a focus on academic achievement. Even before NCLB, 19 states had mandated low-performing schools to receive state assistance and 13 of them had assigned a state staff person to be on the assistance team as a way to enhance state oversight. NCLB pushed SEAs further to be involved more in the improvement of school performance.

As the number of schools fail and the pressure to make AYP increases, school takeover based on school performance becomes ever more intense. Since 2002, SEAs have taken more proactive approaches to work with districts to bind the central agency and the regional units into one force. For example, some states believed that mediating local talent is more effective than direct state intervention. In State 10, for instance, the state department of education coordinated an assistance team to help high schools with low graduation rates. The SEA selected team members from high performing schools that resembled the schools in need

of help. The coordinator role allowed the state department to present itself as a less intrusive intervener in the relationship with local schools and districts.

According to the state official, the relationship turned out to be quite successful – the list of low-performing high schools decreased from 127 to 100.

In state 3, state assistance under the state reform initiative before NCLB included a school improvement fund grant and highly skilled educators whom the SEA would pay extra to be on contract, to go into low-performing districts and work full-time in schools. A scholastic audit process was added in 1998 where the audit team was made up of members from different interest groups other than teachers. The team was trained to evaluate the strengths and improvement areas for schools. Under NCLB, school districts that have reached Tier 3 low performing status must begin a corrective action process that includes state level intervention. As part of the state intervention, the state 3 SEA started an assistance team program where each Tier 3 district would receive assistance from a team of five members, including the district superintendent as team leader, a superintendent mentor from the state association of school superintendents, a school board mentor from the state school board association, a highly skilled educator from the SEA and a SEA facilitator. Based on the result of the audit process, the assistant team meets to develop a plan to implement the audit recommendations. Also as a mediator, State1 contracted with teachers and administrators in the districts to reassign them to under-performing schools and pay their salary out of state budgets. With the reallocation of resources, the department was able to focus on the greatest and most urgent needs.

Another aspect of this changing relationship is the involvement of districts in SEAs' decision-making processes. State 6, for example, implemented an adaptive process to work out details of any new rules with local districts before it proceeded to a public hearing. The department decided to engage the local schools in the policy decision-making process to better address their needs with state initiatives:

We were getting frustrated with creating these rules that we thought were wonderful and then go to a hearing and have 25-30 schools come in and tell us how stupid we were and waste time and then go create another one and have the same thing kind of happen, and it would take months and months to go through that process.

The State6 official continued to explain their solution to make the department work more efficiently with local districts and schools:

And we decide that when a new rule drafted or an old rule revised, we go out and make a round throughout the state, invite anybody who wants to come and talk to us and tell us what's wrong with the rule or what needs to be changed, and so the first draft of any changes actually comes from the field...

The department then made changes based on the local suggestions and sent the draft out again; this continued until no significant changes needed to be made. The collaborative relation with districts, on the one hand, ensured that the draft would meet local needs, and on the other hand, created a community consensus around the SEAs' role in implementing accountability. In the process, the department built a collaborative network and communication channel to listen to the local districts and to align the state and the local interests. Together with other engagement activities, the State6 department managed to strengthen its relationship with districts. Collaboration with districts not only made the draft

address local needs but also created a community consensus around SEAs' role in implementing accountability. Statewide surveys that State6 conducted in 1995, 1998 and 2001 showed that the SEA had advanced from the last resource districts and school turn to for help to the first.

The change may be illustrated by contrasting some SEA's relationships with districts in the past. State2 officials gave a vivid account of their relation with districts in the past,

...for a long period of time in the 1980s, we didn't listen to the district or other folks. We were very focused; we moved ahead and if anybody got in our way, oh well, we ran over them...the way we worked was very much in isolation, individuals in isolation, different groups in isolation...there was a lot of Lone Rangerism going on around here.

A change in leadership in the early '90s and a state reform in State2 made the Department of Education a cabinet agency that reported directly to the governor, instead of being managed through the State Board. This system change allowed the department to make independent decisions on how to fulfill its function in the state's efforts to set up an accountability system. At the beginning, districts were not at all interested in working with the SEA and were very resistant to a statewide curriculum, which is a key element of the state accountability system. Over the years, the department learned to listen to districts and schools and to see how issues could be accommodated. In collaboration with teachers and administrators, State2 SEA has rolled out a recommended statewide curriculum for English language arts and mathematics while several other key content areas are in development.

As state-district collaboration picks up, the age-old debate of local control continues to create friction between SEAs and districts. In 2006, 178 district superintendents in Colorado presented a “white paper” to the state commissioner of education that called for more inclusion of district leaders in state decision-making and more state service to districts (McNeil, 2006). The state commissioner explained that the SEA had become an intrusive regulatory agency under NCLB and that providing services to local districts was not the purpose of the federal funds. More recent incidents of massive school closures in Kansas City, Cleveland, and Detroit also showcase the tension between SEAs and districts (Aarons, 2010). SEAs closed malfunctioning schools and seized control of reconstructing these schools as they saw fit. In the case of Kansas City schools, similar state attempts at closing schools had been blocked by the school board before the recent state proposal won a 5-to-4 majority from the board.

The changing relationship between state and local education agencies, either collaborative or intrusive, is influenced by both state education reform mandates and federal requirements through NCLB. However, there are times when the two levels of mandates are in conflict with one another. In State3, for example, although NCLB imposes additional intervention such as school choice and supplemental education services, its SEA has not changed the levels of corrective action and restructuring significantly because intervening in local schools, replacing school staff and taking over school management are legally prohibited by state law. In State6, the SEA did not change much to accommodate NCLB’s emphasis on low-performing schools; instead, it insisted on interacting

with districts without directly intervening in schools. The state superintendent explained it this way,

...we have huge philosophical issues with No Child Left Behind...we're not going to go into a school until they ask us to. ... We don't have any school authority here... it is the school district we can do something with, but not that particular school.

Instead, the State6 SEA made recommendations of a continuous improvement model that can be used to focus on areas of low performance and to meet the requirements of the state accreditation process. Its website, for instance, provides resources for schools to set learning goals and improve a particular school program. State6's disbelief in the "swat" school team approach echoes the approach of other states where the state departments of education no longer dispatched staff to directly intervene at the school level, but became more responsive to districts. Some SEAs may be more involved with schools in big urban districts, but building the district capacity is generally considered to be a more effective way to improve school performance.

Lunenburg and Ornstein (2004) categorize state reforms between 1991 and 2000 into four waves: (1) academic standards, (2) professional policy, (3), curriculum development, and (4) assessment and accountability. Waves of state reforms in the past have affected the relationship between SEAs and school districts over time. However, the trend of collaboration seems to serve SEA interests in multiple ways. First, either through state funding, training or other forms of support and collaboration, the interaction with districts allows SEAs to implement accountability without straining limited in-house resources. SEAs may

take advantage of districts' expertise and knowledge in curriculum and instruction as well as their good relationship with schools to carry out state reform agenda.

Second, working with districts tends to promote a more sustainable environment for school development. State 7 had the experience of taking over low-performing schools in the first year of NCLB. The state commissioner shared the lesson learned from the experience:

We have given [the school] back to the district...and we did that as part of this understanding that I can fix one school but if I came out of the school and didn't fix the district, the district would smother the school again... it would just back in to the protocols that it was existing in.

In addition to its aggressive school intervention and monitoring, this experience provides a rationale for State 7 to focus on capacity building at the district level and to create a community that promotes school improvement. State 7 commissioner emphasized community building in the SEA's leadership role, which he argued was unfortunately lacking in the policy environment but was an important part of state intervention to school restructuring and sustainable improvement. "Building community here is hard work," he said,

... for me to be selling that this is a community interest for every child to make it, is clearly not public policy yet. ... And I would argue to send me on a mission of all kids to standard and tell me that the quality of the future of this country depends on it, but in order to do it I have to overcome all of that without anybody agreeing to that but I'm gonna do it in the schools alone, is a fool's errand.

The collaborative relationship with districts shows SEAs' continuing efforts to listen and invite the involvement of local school districts and communities in their decision-making. These efforts are reflected in the various

infrastructures where SEAs bring educators and administrators as well as representatives from professional organizations to build the state system of support. Accountability roundtables and state support teams are common for SEAs to use to extend their network of partnership. In State 1, for instance, the accountability roundtable represents all sections in the SEA that work with schools in any capacity and regional in-service centers; the state support team in 2006 consisted of 11 regional school improvement coaches, 13 peer mentors who were master teachers placed in multiple schools, and representatives from state initiative programs and LEA regional specialists in special education and federal programs. The state department organized these two networks to provide technical assistance and support to low-performing schools.

In the recent competition for the Race to the Top grants, some state proposals featured district flexibility to gain local support for winning the federal funds. Illinois, for instance, featured in its proposal 12 “super LEAs” where district superintendents and union leaders agreed to waive collective bargaining to pave the way for implementing new evaluation systems. For states that took a more prescriptive approach, their grant proposals were more likely to encounter resistance from the districts and, therefore, reduce the feasibility of the proposed reform (Sawchuk & Maxwell, 2010).

The SEAs’ relationship with the state legislature and governor also has changed on a state-by-state basis. As part of state government, one of the SEAs’ main responsibilities is to advocate for particular issues in public education and solicit appropriate state funding. Some informants for this study have worked with

multiple governors during their terms because they and the governors are on staggered terms; therefore, SEAs constantly face the challenge of negotiating with state governors who have different political agendas and political affiliations (Johnston, 1999). State leadership is an important factor that drives organizational change in SEAs, especially for states with elected state superintendents and state board members who bring different perspectives and visions to the job. Any discrepancy between the two levels of governance may bring complications for SEAs.

The increasing attention to education in the public forum has drawn growing interest from the state government (Johnston & Sandham, 1999). In State9, for example, the state legislature became more involved in education to prevent state intervention with low performing schools. State9 official explained as follows,

They [the state legislators] are much more active in paying attention to the education arena than before, and that's a direct result of NCLB and a lack of clarity in the federal law in terms of what state expectations are for these low performing schools.

The SEA official in State9 noticed that there had been more bills about education in 2007 than ever before, and the legislature was much more involved in blocking the state board from intervening in low-performing schools. McDonnell (2008) synthesizes motivation for governors' involvement in state education policy as "their framing of a strong connection between improved education quality and economic development, especially in Southern states; a desire for greater accountability over the increasing state share of public education expenditures; and their general discontent with SEAs' fiscal and administrative autonomy as a

result of federal funding” (p. 4). Indeed, the increasing political attention sheds more light on SEAs under the watch of state government, but does not necessarily bring in more state funding in public education. The increasing number of schools being identified under NCLB made it particularly hard for SEAs to show positive results of previous state funding. Without evidence to show returns on the state’s previous investment in public schools, SEAs found themselves in an awkward position to request additional state budget for the coming year. The increasing attention from state government and the little evidence of school improvement challenge the status of SEAs and further complicate the relationship between SEAs and the other branches of state government (Maxwell, 2008).

NCLB has strengthened SEA’s policy positions in many cases, shouldered the blame for some of the less popular policies, and provided a contrast for individual state’s interpretation of effective school systems. However, the law’s lack of clarity in terms of what state expectations are for low-performing schools makes some state governments concerned about the power SEAs have gained through NCLB as well as the state accountability system.

SEAs have increased their contracts with the private sector to expand their capacity. Take the state assessment system, for example. As the state data systems become increasingly complicated, SEAs have to use vendors to design and administer state tests. Experts with skills to set up data systems are too expensive for state government salary scales. The contractual arrangements still have high price tags but then allow work to be done at a relatively low state budget. Partnerships with business communities have increased as they are often closely

linked with state standard setting, professional development policy, curriculum development, assessment and accountability (Lunenburg & Ornstein, 2004; Waddock, 1995). The expanding network of service providers posed another challenge to SEAs – the responsibilities to look for providers, determine their capacity and evaluate the provision of services.

The extended partnership with the private sector, however, does not necessarily overshadow the SEA's leadership role as intermediate government agencies. A State7 official illustrated his thinking this way:

...they [business communities] somehow think their model is the answer. I don't see any evidence. ... in the capitalist system as I know it, somebody does lose; ... But you've told me you don't want anybody at the bottom end; you want everybody to standard. There's a contradiction in kind of a survival of the fittest strategy in all kids to standard.

He continued,

And by the way, why do you keep thinking that the open market is the answer in a global place...[where] we're competing with [countries] that are doing better than us are not using that strategy. If you go to Finland and Denmark, if you go to Singapore or Taipei, it's public policy that all kids are gonna get this.

This statement illustrates well the faith in the SEAs' leadership role that is commonly expressed by interviewed state officials. Despite the widely reported shortage in resources and capacity, when asked, interviewed state officials generally agreed that SEAs are the logical candidates to lead the SBA reform. A report by the Institute for Educational Leadership (Usdan et al., 2001) endorses SEAs' pivotal roles in leading education reform with a comparison to other players, such as governors, legislators, state boards and the business community.

The report claims, however, that SEAs are “almost too lean” to exercise their potential in full (p. 10).

Last but not least, the partnership among states has become particularly valuable to many SEAs after NCLB. For example, the number of states that mandated assessments for districts to measure the language proficiency of English learners increased from 32 in 2003 to 41 in 2004. Of the 41 states, 13 reported that they relied on state consortiums to develop assessments for English language learners. The state membership to the World-class Instructional Design and Assessment (WIDA) consortium increased to 24 in 2010. The consortium was initially a collaborative effort among three states in 2002 to design and implement accountability systems for English language learners. Another example for state partnership is the New English Common Assessment Program (NECAP). New Hampshire, Rhode Island, and Vermont form the NECAP partnership because none of them was prepared to administer annual testing as required by NCLB on its own (McNeil, 2010). The State7 commissioner described the changing relationship among states this way:

When I was first a chief, the chief’s meeting was a show and tell. These are the wonderful things going on in my state, and there’s not kink in the armor. Now when you go to a summer institute or a policy forum, the chiefs are going “Is anybody getting any traction on this one here?” There’s awful lot more, almost on demand sharing of strategies, of information system... I would say of all the things that I feel supported by is actually the chiefs’ network.

State2 officials heavily emphasized the state collaboration through organizations such as the Council of Chief State School Officers (CCSSO) to fill in the knowledge and resource gap in their department. CCSSO has strengthened

its technical assistant to states since the early 1990s when system reform became the catch phrase in anticipation of the Goals 2000: Educate America Act (Education Week, 1993). As more schools and districts were undergoing sanctions, either corrective action or restructuring, the SEAs became increasingly concerned about their capacity to be able to support the locals effectively, not only financially but also the knowledge base of what works in turning around underperforming districts. CEP's 2003 survey shows that, in the 2002-2003 school year, 25 states reported that they did not have the expertise to provide technical assistance to identified districts and schools, and the number of states increased to 32 in 2004 and 2006. The chiefs' network provides a reference for SEAs to share struggles, learn from others' experience, and build a repertoire of strategies that is proven to work in other states.

A few SEA officials mentioned their working relationship with the U.S. Department of Education mostly in the context of federal monitoring and the inflexibility of NCLB. NCLB has been assailed as an encroachment on states' authority over K-12 education. Murphy (1991) uses Title I programs as an example to argue that one problem with federal mandates having little impact on improving education lies in the resistance from state staff to fully comply with the federal mandates; the top-down approach to regulate school systems is in conflict with the view of state staff who see themselves as professional educators. The pushback from SEAs is most evident in a comment by State6 Superintendent on the responsibility of compliance with NCLB:

... it is their (the U.S. Department's) responsibility to make it possible for us to be in compliance with No Child Left Behind

although we're going to have some differences of opinion about what that compliance means, but it's their job not ours ... the whole relationship between the U.S. Department of Education and the state education agency is not a partnership, and they don't know how to create a partnership, it's got to be an equal partnership and if there is to be a senior partner it has to be the state not the feds. They should do a lot more listening to what it is that we think needs to be done instead of them worrying about the absolute compliance of the letter of the law. ... I don't see any change in the relationships or the culture that goes across our two agencies.

State2, State4 and State9 officials also reported the lack of support, feedback and partnership from the U.S. Department of Education. They were not particularly optimistic that under the working culture at the state or the federal level the partnership was going to be a reality. The State 7 commissioner commented,

My commissioner is dedicated to the states being responsible. So I'm a complete advocate for the pressure that the feds are bringing to the states, but I don't think they have accepted the fact that if you understand that and that states weren't doing that and they don't have the habits of organization to do it then don't assume just by saying it louder I'm gonna do it. I need a little help here.

A recent report by the National Conference of State Legislatures (2010) warned that the education agenda under the Obama administration is equally prescriptive, compliance-driven and intrusive. In many cases, states had to change their laws to get an edge in the competition for the Race to the Top grant. On one hand, such compliance reflects what McDonnell (2008) calls parallel institutional histories where the policy histories of the federal and the state government showed similar institutional phases and policy goals. On the other hand, such compliance does not necessarily generate the commitment and passion that is needed for SEAs to take care of schools and students. It becomes an end in and of itself and would fail the

purpose of SBA if SEAs meet the regulations without making contributions to develop a system-wide infrastructure to help the growth of students.

Motivation for Change

The change in SEAs is mainly driven and shaped by three sources of demands – the policy environment, peer pressure and local competition. The first and foremost motivation for change is the demand from state and federal mandates accompanied by flat funding and reduction in staffing and resources. The concepts of state accountability and alignment to state standards raise the age-old dilemma and debate of local control in American public education. Especially for states with a tradition of strong local control where people are fiercely protective of their local decision-making, SEAs have had to make changes in their role, function, structure and partnership with districts and other organizations in order to fulfill what state and federal laws have required them to do. In the meantime, the funding for SEAs to lead the change has been inadequate. The number of states reporting hiring freezes or funding cutbacks increased from 30 in 2003 to 37 in 2004. During the restructuring of identified schools, SEAs employed a series of strategies such as organizing school support teams, identifying distinguished teachers, giving special grants to districts, mentoring or coaching principals and teachers, and providing educational or management consultants and additional full-time school-based staff to support activities. Figure 7 shows the funding streams for SEAs to carry out these strategies as reported in 2006. It showcases SEA's heavy reliance on federal funding to play its leadership role under NCLB. For instance, federal Title I money was the only financial

resource available for school support teams in 23 states and for special grants to districts in 25 states.

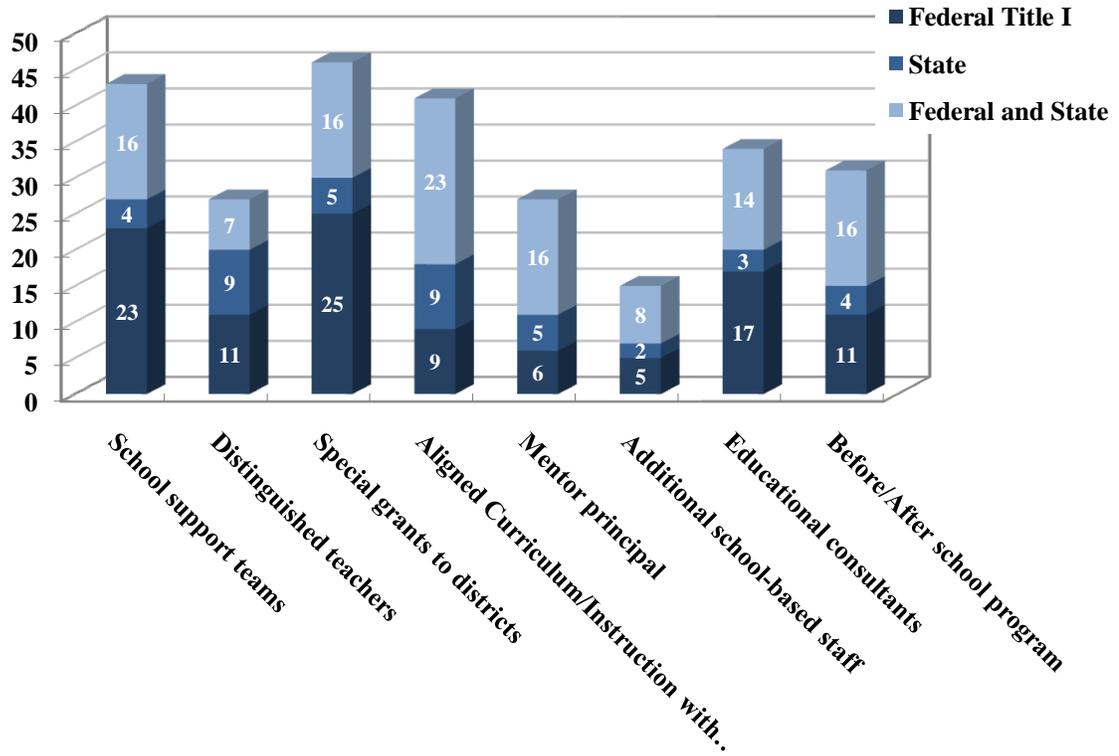


Figure 7. Number of states reporting funding sources for state programs.

The 2006 survey also showed that only ten states found the federal Title I school improvement funds sufficient to improve student achievement in identified schools, and almost half of the states (23) did not have state-funded programs to assist low-performing schools. SEAs had to work with flat federal funding but, at the same time, respond to the increasing number of identified schools to fulfill its responsibilities under NCLB. In many cases, it was not optional but imperative for them to optimize operations and develop new relationships and networks.

Many SEAs that experienced state budget deficits also faced personnel cuts and programmatic challenges. One SEA noted on the survey that the State faced such a fiscal impasse that the education budget passed six months late, requiring school districts to borrow or use reserves to maintain programs. The situation seemed to get better in 2006 as the number of states reporting fiscal problems dropped from 30 in 2003 to 21.

Although the current public debate about education accountability was mostly triggered by the enactment of NCLB in 2002, many SEAs initiated their state data and accountability efforts under the influence of state education reform initiatives prior to NCLB. In State4, the state's Education Reform Act had the SEA reorganize its program to respond to the state law's call for improving public education. State5's School Improvement Programs also started in early 1990s and established a much more comprehensive accountability system over time. State7 has had its state accountability system as a response to its reform law in 1997 for standards, testing, intervention, accountability, public report cards, and disaggregation. State8 and State9 also started state testing for accountability purposes under the influence of state initiatives.

The increasing demands from state and federal SBA policies not only redefined the SEAs' function, but also gave SEAs new sources of power. In State3, for instance, after the state's Education Reform Act was enacted in 1990, the state legislature made a \$1 billion tax increase to support the reform, and the money went to state organizations such as teachers' unions that were then willing to make some compromise for the new financial resource. According to the

interviewed SEA official, the buying effects did not last long before some of the organizations pushed back on changes in the governance structure in education, but the political turf battle eventually settled down as the department's leadership role was institutionalized over time. It took the State3 department six years to roll out all the components of the state accountability system and even more years for implementation. By the time NCLB came to be effective, SEA's leadership role in State3 was already established and its partnership was also well formed.

With the increasing number of identified schools, the leveling off of student achievement and the persistent achievement gaps, SEAs continued to adjust because they were not getting the results they anticipated. Even for states with a history of state testing and accountability systems, organization-wide changes are still needed to integrate systems and improve operations to meet the pressing expectations of SBA. The institutional shift to SBA intensified SEAs' work and forced them to make adjustments to be more efficient with the available resources. For example, State2 officials described their experience under NCLB as follows:

... with the responsibilities that we now have because of NCLB, we have had to insist that our staff maintain a very strong focus on the supports ...for our districts and charter schools. As opposed to something... that would be nice to do, but not necessarily a have to do, and certainly not necessarily something that's going to give you as much pay off as we need. ... the biggest thing is the timing of when things get done. There's much greater pressure to get things done, but faster with NCLB.

In many ways, NCLB intensified SEAs' work and shifted their role to a facilitator of change and reform, but it did not cause a total revamping as many state reforms had done in the '90s. For states that did not have accountability systems before

NCLB, the impact of the federal law could be tremendous. However, most of the interviewed SEAs, regardless of their history with SBA, are funded mostly by their state government, but a significant portion of their work is for NCLB. It may be another reason for SEA officials to give credit to state reforms for their organizational change.

The second motivation for change comes from competition and imitation among SEAs. One example would be state performance on national tests. Many state comparisons are based on the NAEP test results. Pressure can be high for states with low test scores on the national tests or if student performance differs greatly between state and national tests. The public questioning about the reliability of the test scores and validity of the state tests may challenge SEAs' leadership in raising student achievement as well as their capacity to carry out functions such as test administration and school intervention. A State 1 superintendent, whose state performance on NAEP is in the bottom ten, was concerned about evaluation of SEAs based on the comparison of student performance on national tests and considered a lack of funding a major setback for his SEA to make progress on improving student performance.

SEAs have watched each other make policy decisions. Once a policy lever, such as state testing, becomes widely adopted as standard practice, SEAs are somewhat pushed to follow suit. States without such practices often have to explain their reasons. One of the interviewed SEAs did not have a state test, and its department had to constantly defend their assessment system and explain to their state legislature that a single state test was not necessarily a valid way to

measure learning. “There are some who think that (a single state test) is the only way to do it,” the state official said, “we’re saying no; that’s the least valid way to measure learning and the tension comes up from time to time between our assessment system and what every other state is doing.” Instead, the state promotes a localized system of academic standards and student assessments. In order to convince the other interest groups in the state and the U.S. Department of Education, by 2007 the state SEA had trained more than 110 educators to help validate the local assessment systems.

Peer pressure is also illustrated by the integration of standard setting. A national survey by Education Week found that states pay close attention to their peers’ policy changes (Robelen, 2010). Among the 50 states and the District of Columbia, 16 states were cited as influencing standards of other states and 3 states were cited 10 times or more. The study concludes:

Many states look to their neighbors to inform the writing and rewriting of their own academic-content standards. In fact, 30 states were cited as influencing the way in which their peers defined expectations for student learning and performance in either English/language arts or mathematics. The standards of California, Indiana, and Massachusetts were most frequently mentioned as models, with each cited at least 10 times by other states.

Last but not least, competition with local districts for staff motivates organizational change in SEAs. Although SEAs’ leadership has been highlighted in the current policy environment and the local decision power is quickly evaporating in some districts, the diminishing resources at the state and federal level make SEAs uncompetitive with many local districts in terms of technical knowledge and relations with local schools. It is common that SEAs do not have

sufficient funds to maintain a competitive edge with the highest paying districts. The wage competition directly relates to the staff changes in SEAs. Sometimes SEAs cannot get the expertise that they need because of salary issues; sometimes SEAs have the expertise and invest in growth but then a district with a higher salary structure hires staff away. State4 officials described the external competition for high-quality staff this way:

We're not having a problem attracting them. For every job, we get plenty of applicants. Being able to actually close the deal and hire top-quality people and keep them is a big problem. We lose people all the time to either local districts or better-paying jobs elsewhere.

In State5, a math consultant could go out and made about \$8,000 to \$10,000 more in a school district, given credit for their SEA experience. Besides staffing, competition with districts also exists between the state and the local data systems.

A State9 official explained:

... in any event, however, we put [the teacher identifier and student data] together, we're never going to be able to match the level of utility that local school systems will have out of it because they can go far beyond anything that we would be putting in whatever limited number of fields we have in the state system...

As some districts are better at attracting staff, SEAs borrow experts from districts to provide technical assistance to help improve low-performing schools. Beside the competition edge in staff expertise, local districts tend to have stronger ties with local schools and better knowledge about the schools. Both technical capacity and the local network make districts valuable partners for SEAs to bring fundamental changes to schools.

Change Strategies

Previously, I looked at how SEAs changed internally in terms of their structure, staffing and data systems. SEAs managed to make these changes through two means –networking to expand organizational capacity and collaborating across structural levels to improve efficiency. Through extensive networking, SEAs were able to fill new positions to meet changing organizational needs. The commonly used strategy to borrow expertise from districts changed the composition of people working for SEAs. It accommodates limited state funding and is an effective solution to handle immediate needs. However, districts are less likely to release their key staff to others, especially for a relatively long period of time. State5 officials gave the following example:

...they're [districts are] more than willing to come up and attend meetings, and committees that we have, but again, that's a district employee, and some schools are reluctant to release those people for a significant amount of time.

Therefore, SEAs had to extend the staffing network beyond public school systems for hard-to-staff positions. For example, to fill positions to build the state data system, State1 officials sought help from corporations, while State10 officials found the right people for three deputy vacancies by making the search in a P16 framework. The network strategy allows SEAs to adjust for their new roles with the appropriate human capital.

Besides networking for personnel purposes, SEAs have also created new relationships across organizational structures to improve operational efficiency. The breakdown of organizational hierarchies has not only made internal communication less time-consuming but also increased internal collaboration and

flexibility to handle the increasing workload from the state and federal mandates.

A State6 official described their strategy this way:

...we left the teams intact; I'm not sure our teams would look any different than most others, but it's the place where people work out of special education or early childhood and so forth.

In other words, although each individual working unit did not experience dramatic change, the interaction among staff across units has intensified. The special education issues, for example, are not simply the responsibility of the unit in charge of special education. They are being solved outside the unit together with staff in other units. The strategy is to expand teamwork from within-section to cross-section so the organizational responsibilities can be better communicated and shared, and the resources can also be shared and utilized more effectively.

One of the State2 officials recalled that the data unit of the department in the past rarely shared data with other units, but now the data ownership has been widely distributed not only within the state Department of Education but also with districts and schools. There is a greater understanding at both the state and local level to make data-informed decisions. A State8 official also witnessed the improvement of cross-section collaboration in her department, driven by the goals pushed by NCLB for student achievement. She reported that, prior to NCLB, certain parts of the agency were silo and not necessarily connected to the improvement of student achievement. The federal law's emphasis on student achievement made cross-divisional and integrated teamwork inevitable so the agency could meet the expectations for the achievement of all students. The State 6 official described the change in the culture of his workplace this way:

... No Child Left Behind became everybody's job... we do cross-group work teams and the work gets done in a group. Oftentimes they meet and say, "do we have an agenda?", and if they do they meet and if they don't they go back to their work sites... I don't think anybody can even remember doing isolated problems... I don't think anybody can remember doing things like NCLB or integrating a continuous progress process by themselves. Nobody sits by themselves anymore.

Cross-section collaboration is also used to reallocate resources externally.

State6 replaced many of its centralized operations and distributed funding to regional centers to build a network of programs at the local level. The decentralization of operations not only financed districts to build needed programs but also increased the SEA's administrative efficiency by expanding the number of students the state funding could serve.

Besides networking and cross-level collaboration as two strategies to make internal changes, SEAs also changed their external function with districts and schools by investing in local capacity building, including training the trainer, reviewing curriculum, using and interpreting data in school planning, and working with school districts on effective interventions with low performing schools.

State1 cites the following example:

I know XX state had done some growth model work that went back to mid-90s, way before the law [NCLB], but most states had not and we were in the "had not" category, and it has really caused us to spend a lot of time-well worth time but a lot of time – training people in the local districts on how to better interpret data that we now can provide them. That's been a massive training project within itself so that's time consuming and costly, but then the additional contracts...

NCLB's school improvement requirements ask states to use 2% of their federal Title I Part A fund for school improvement in 2002 and 2003 and 4% in 2004 to 2007. Building district capacity is one of the strategies states have used to

meet these requirements. That has changed the relationship between SEAs and LEAs (McClure, 2005). The following excerpts from comments in the 2004 survey illustrate how SEAs used district capacity building as a strategy to turn around low-performing schools:

“The State Department of Education’s model for providing assistance to schools in need of improvement has completely changed to that of providing “district assistant teams” to build a district’s capacity to assist schools. Because of the lack of sufficient federal and state funds for technical assistance, the State Department of Education does not have the staff to provide assistance to a little over 1500 schools. Working with 301 districts is possible.”

“[The State Department of Education] provides additional financial resources to permit districts to expand local improvement initiatives and/or access outside technical assistance from the SEA or higher education institutions, private non-profit organizations, education service centers, or external experts.”

“The SEA is meeting with a team from each district to review their consequences, requirements and timelines; working with the individual district to ensure the set asides; upon request assigning a coach to work with the district on developing an improvement plan and approving the plan.”

“State school improvement funds were made available through intermediate districts to fund professional development activities for district needing improvement.”

“The SEA provided an informational meeting for the districts in improvement, informing them of the requirements for Title I districts in improvement and the assistance the state will provide. After a district on-site audit, the state DOE (Department of Education) will develop a technical assistance with each district, if requested, designed to meet specific needs of each district. School Support Team members are assigned to each of the districts.”

“The state has established an accountability model for school improvement in partnership with district staff members statewide and national experts. The foundation of this accountability model

is teacher training and district-level leadership development which has student achievement at their core.”

The following survey in 2006 shows that 42 states were able to provide technical assistance to identified districts to a moderate or great extent. The strategy to beef up district capacity through state collaboration redefines SEAs’ roles in many ways, particularly in states with a manageable number of districts. SEAs with more districts often have their regional delivery centers implement such a strategy. The rationale for this strategy is twofold. First, the number of identified districts is more manageable compared to the number of identified schools. CEP’s 2003 and 2004 survey shows that the number of states with identified districts increases from 26 in the 2003-03 school year to 36 in 2003-04 school year, not including 11 states in the process of identifying by the time the 2004 survey was delivered. The number of identified districts not making AYP for two or more consecutive years ranged from 0 to 81⁴, which is a much more manageable number compared to the number of identified schools in these districts. Another attraction of building district capacity is the possibility to build upon districts’ existing capacity and make use of it for statewide reforms. As discussed earlier, districts can be more resourceful in knowledge, expertise and networks with schools, which SEAs often lack. Instead of building SEA’s capacity, working with districts can make state reform more efficient and effective. A State9 official elaborated the rationale for the strategy in this way:

...[we] want to be able to influence at a scale that can make a difference with...1,400 schools. So if we can work at the central office level and have them deliver the services, then there’s

⁴ Some states use spring 2004 to establish baseline data under NCLB. Therefore, no districts were identified by SEAs for two consecutive years.

somebody there all the time carrying that message out, and there are some systems that are excellent and do that quite well.

Neo-institutional theorists argue that the external networking process can be an effective strategy for organizations to manipulate the environment and, in the meantime, gain legitimacy (Scott, 2008). What the external networking strategy does is to build SEAs' goals and procedures as institutional rules for the local operation of schools.

Lastly, the strategy of investing in district capacity preserves the power of district offices and eases the tension of aggressive state intervention in identified schools. The strategy of building district capacity redirects the financial distribution of state funding to districts and shapes the allocation of SEA staff and SEAs' relationships with districts and contract vendors. It augments SEAs' leadership role without sacrificing too much local control. Less intrusive, SEAs soften their roles by coordinating and facilitating learning and exchange of experience among districts. A State2 official explained the rationale:

...[districts] don't necessarily do it on their own, but if they come together and we're able to kind of begin the conversation, it's more likely that they will share and so forth and work together than otherwise.

Before NCLB, 19 states mandated low-performing schools to receive state assistance. The number increased to 38 in 2010 (Education Week, 2010). The assistance teams often consist of local educators and SEA staff and provide workshops to convene educators to share experience (Education Week, 1999; Richard, 2005). A State8 official described the work process this way:

... we brought together educators and citizens and professional organization representatives from throughout the state to develop our

state system of support. And our state system of support developed by this group from the field telling us what really is needed. ... it consists of an assessment of need and then a peer review so that there can be technical assistance given based on that assessment. ... from that point, we target the funds that are provided under the law to help and assist schools identified for improvement.

States adopting this strategy, however, do not necessarily provide sufficient investment or deliver the investment as effectively as districts would like. Some SEAs do not have needed human and financial resources to build district capacity. As shown in CEP's 2003 survey, 25 states indicated that they did not have sufficient in-house expertise to provide technical assistance to schools and districts that had been identified as needing improvement; the number increased to 32 in 2004 plus 10 other states that had the capacity in 2004 but expressed concerns about the future as NCLB became fully implemented. In the 2006 survey, 43 states reported that insufficient numbers of staff moderately or greatly challenged their capacity to monitor the activities of districts that had schools in improvement, corrective action, or restructuring. Inadequate federal and state funds were also cited by 39 and 34 states respectively as challenges. Similar state reporting is found in regards to challenges to provide technical assistance to identified districts. It is not surprising that district complaints about lack of state support and guidance may tell the other side of the story.

Conclusion

Findings of the study show that SEAs have made multiple organizational changes in their internal structure, staffing and technology as well as external relations. Specifically, the traditional funding-centered structure of organizational hierarchy, illustrated by the relocation of a Title I office, has broken down,

replaced by a new structure centered around accountability tasks, such as standards, assessment, accountability and professional development to better address the emerging needs for expanded internal collaboration.

Although SEAs have experienced increasing amounts of responsibilities from both state and federal laws, many did not have the corresponding growth in their capacity in terms of staffing, expertise and funding. Limited funding made it difficult for SEAs to maintain expertise and sufficient numbers of staff. Quite a few SEAs have shrunk considerably in size during recent state economic downturns. Changes in the institutional environment also changed the nature of SEA staff's work to be more compliant. In the meantime, the emphasis on technology and data systems has pushed SEAs to bring more technical expertise in information technology and data management. As a solution to imbalanced resource supply and demand, SEAs tend to contract external staff for specific projects, which has changed the overall composition of SEA staff.

The development, the modernization and the expansion of data systems signify major changes in the use of technology. Since states have different histories with education data systems, the accounts of the changing experience in using technology addressed different stages of the change. Consequently, the organization-wide changes in data system mean expansion to some SEAs, but to others it brought about dramatic change in the infrastructure, building from ground zero. However, regardless of differences in experience with data systems, the states all went through changes to meet the specific demands of the current

federal and state requirements and to more effectively incorporate data in policy decision-making.

Externally, SEAs expanded their partnerships dramatically to carry out their changing roles and, at the same time, make up for the limited resources. SEAs' relationship with districts has shown a collaborative trend, changing SEAs' role from regulatory oversight to partnership and assistance providers. As the private sector was more involved as partners in SEAs' external network, overseeing private contractors became a new responsibility that challenged many SEAs. Last but not least, the network among SEAs provided a valuable resource for SEAs' development.

Organizational changes in SEAs have been, in many ways, shaped by the increasing institutional demands and decreasing resources, peer pressure to adopt the "standard" practice in the field, and the competition from other collaborating educational agencies. Particularly, SEAs used networking, cross-level collaboration and local capacity building as strategies to bring about organizational changes. Through networking, SEAs were able to build a consensus with other agencies and expand their capacity to carry out increasing responsibilities but with limited personnel. Cross-level collaboration helped SEAs make internal changes to improve operational efficiency and make the most use of their limited resources. Lastly, building local capacity allowed SEAs to develop new relationships with local schools and districts and, in the meantime, take advantage of local resources for state accountability.

In the following chapter, I will discuss how evidence of changes illustrated in this chapter validates the organizational change model proposed in section two. I will also discuss implications of the study and directions for future study on institutional effects and organizational changes.

Chapter 6: Discussion and Implications

The analysis in the previous chapter indicates that state education agencies (SEAs) have experienced varied degrees and types of change in organizational structures, staff composition, technology capacity, and relationships with other state and local government entities.

The motivation for change was multi-faceted. The most salient factors identified in this study include 1) the tightening of state budgets and 2) the pressure from the state and federal policy change toward standards-based accountability (SBA). Competition among states through national assessment also played a role but was not a major factor for states.

State employed three common strategies to bring about change – networking, cross-level collaboration, and building upon local capacity. The choice of strategy reflects the changing role of SEAs in the state education system; it becomes clear to more states that local support and extended partnerships are indispensable to their leadership role in the standards-based accountability (SBA) reform. Given the limited resources and increasing obligations, SEAs also prioritized the optimization of their operations, improving the efficiency of their internal communication and the sharing of information.

The knowledge of organizational changes in SEAs provides two major implications. First, based on neo-institutional theories, the proposed theoretical framework provides a helpful perspective to understand the adaptive nature and the changing patterns of institutionalized organizations, such as SEAs. Second, the SBA policy has changed the landscape of the U.S. education system and its

impact is not limited to the end receivers of the policies at local schools but extends to policy delivery organizations, such as SEAs, on their function, structures and partnerships. It redefined the role of educational agencies at the federal, state and district levels and, more importantly, relationships across levels.

Revisiting the Theoretical Framework for Organizational Change

SBA's focus on school improvement and student achievement sheds more light on policy than the infrastructure and network of policy delivery organizations that make policy initiatives happen. One of the purposes of this study was to draw more attention to the overlooked policy delivery organizations in the education system and to examine the impact of institutional change on such organizations. SEAs were chosen to be the subject of this study because they are institutionalized educational organizations that have become the linchpin between federal policy and school performance; however, little is known about their experience in playing that role. The changes that occurred in SEAs reflect the shifting landscape of the education system and the demanding restructuring process inside the policy delivery organizations.

The theoretical framework for this study was derived from concepts in neo-institutional theories where organization is considered an open system that constantly adapts to survive in the institutional environment. The framework hypothesizes that institutional changes generate legitimation or competition demands that require organizations to change. Legitimation demands encourage isomorphism where organizations become similar to one another while competition demands tend to lead organizations to become more diffuse. For

institutionalized organizations, such as SEAs, legitimation demands are of greater interest and, therefore, the focus of the study. Institutionalized organizations can achieve isomorphism through change mechanisms such as loose coupling or adaptation. The former tends to lead to symbolic changes while the latter generates more substantive changes in organizations. The organizational field can be transformed when changes at the organization level reach a certain scale. Such field-level change has a collective power to shape or reconstruct the institutional environment. The phenomenon of organizational changes in SEAs validates the framework in the following aspects:

1. Changes in institutional environment give rise to legitimation demands.
2. Such legitimation demands encourage isomorphism among organizations.
3. The process of change can be simultaneously substantive and symbolic.
4. The changing field of SEAs has informed the reauthorization of federal policies and reshaped the institutional environment.

Changes in institutional environment give rise to legitimation demands.

Meyer and colleagues (1980) argue that educational organizations are reflections of institutional rules concerning education. These rules create an environment through political process, regulations and formal policies. The organizational change of SEAs is an example of such influence. Under the influence of SBA, state and federal policies shifted the focus on education from

governmental input to school outcome, which requires SEAs to do more than oversee the distribution of resources. In chapter three, I described the increasing institutional orientation toward standards, assessment and accountability in education. Federal and state SBA-oriented policies and politics pushed SEAs to play leadership roles in setting standards, delivering standardized assessments and implementing accountability policies to accelerate school improvement. SEAs are expected not only to fulfill the administrative function in channeling federal funds but also to monitor school progress. The emphasis on assessment and accountability requires SEAs to expand their technical capacity in order to establish a comprehensive data system to monitor and evaluate progress in school improvement. They are also challenged to provide technical assistance to districts and to intervene in schools directly. Last but not least, the entitled leadership role in SBA reform sets the expectations for SEAs to be able to work effectively with local districts and schools as well as other state constituents as education becomes a political priority and power struggle.

To accommodate the new role, SEAs had to optimize their internal structure, adjust composition of their staff and develop new external networks and partnerships, as discussed in chapter five. SEAs, as institutionalized organizations, are bounded by the regulations and obligations that define the environment in which they exist. Changes in the institutional environment in the last two decades have pushed SEAs to reorganize themselves. A survey study by CCSSO showed that 41 states took actions to reorganize their state education agencies during state systemic reforms in the 1990s (Lindsay, 1995). Findings in this study provide

evidence of how SEAs have changed to respond to the policy momentum as represented by NCLB. The changing definition of what SEAs are supposed to do - in other words, what makes SEAs legitimate in the changing institutional environment - gives the quintessential rationale for organizational changes in SEAs.

Legitimation demands encourage isomorphism among organizations.

Driven by institutional rules and mandates, the way organizations change is not to diversify but to simulate and standardize. When organizations in a field become more similar to one another in their role and structure, organizational isomorphism takes place. In the case of SEAs, a few isomorphic changes have been observed. First and foremost is that SEAs are taking on the leadership role in school reform. The power struggle between local districts and SEAs has been a source of tension in state reforms. With different state histories and cultures, the role of SEAs varies greatly from state to state. As SBA reform picked up momentum in state and national politics, particularly with the enactment of No Child Left Behind (NCLB), SEAs became the designated leaders to orchestrate the reform.

The organization of SEAs was also pushed to resemble some key characteristics of their institutional environment. With more policy emphasis on market-driven efficiency and output, SEAs showed a general structural pattern where main divisions under the state superintendent's office were organized around assessment, accountability, and professional development. They also used similar strategies to achieve organizational efficiency, such as decreasing middle

management and staff, increasing communication and collective responsibilities across units, and extending the use of technology for information management.

The last resemblance among SEAs in the process of change is the recognition of the importance to build partnerships and network with other interest groups and among themselves. It was clear to SEAs that the past tendency to do it alone would not serve their new leadership role in SBA reform. On one hand, the new leadership role requires SEAs to be able to maneuver and coordinate interest groups to implement the reform ideas; on the other hand, SEAs need a network of partners to augment their organizational capacity.

The isomorphic change in SEAs is a combination of regulatory, normative and mimetic practices that are used to help establish SEAs' legitimacy to play the entitled leadership roles. The three isomorphic characteristics are closely associated with SEA's need to respond to the SBA momentum in education. The SBA-inclined policies at both state and federal level put SEAs under pressure to impose standards, standardized assessments and accountability systems. To play the new roles, SEAs set up new infrastructures to perform the assessment and accountability functions and optimize their operation with the limited resources that were available to them. The establishment of accountability offices, for example, was not an option chosen by SEAs, but a requirement in order for SEAs to comply with the coerced state or federal mandates.

This regulatory change also inspired pressures for normative changes in skills expected of SEA staff and the composition of professionals working in SEAs. The increasing duties to provide assistance to local schools and districts

created greater demands for non-administrative staff who could contribute to the organizational knowledge in instruction, curriculum, school management, testing and data system management. The increasing staff in these areas is another feature of isomorphic change across SEAs.

Last but not least, facing uncertainties in policy implementation, SEAs also developed a sense of community where they learned from each others' experience in leading school reform and enhancing in-house capacities. The learning process resulted in certain resemblance among SEAs, but in most cases it generated new hybrids of organizational characteristics, such as SEA's structure and approach to play their leadership role. For example, under the pressure for regulatory and normative changes stated above, the mimetic isomorphism among SEAs is particularly apparent in building comprehensive and informative data systems.

The isomorphic changes summarized above, however, do not mean that SEAs are similar or identical to each other. Despite isomorphic changes, SEAs remain different in many aspects and follow different paths in pursuing similar ends. For example, along with the isomorphic changes are the diverse approaches SEAs took to claim their new role, reorganize themselves, and build and extend external relationships. In some states, SEAs historically play leadership roles through mandated state assessments and accountability systems; some claimed their leadership roles through state initiatives in the 90s and others through the federal push in NCLB. States with a history of SBA-oriented leadership had a relatively smoother internal restructuring process than states that started changing as a response to NCLB. State politics also made both the internal and external

reorganization different experiences for SEAs. Some were more aggressive in intervening in schools and districts; some took more gentle approaches through the mediation of resources and collaboration. Following the proposition in neo-institutional theories that a competitive environment encourages organizational diffusion, the divergence in SEAs' approaches to standards-based accountability is likely to continue under the current federal strategy of state competition for Race to the Top and i3 funds.

The isomorphic characteristics identified in this study reveal changes beneath the diversity among SEAs. First and foremost, the institutional expectation on standardized-based accountability from both state and federal government is a major force driving the organizational changes in SEAs. Such expectation not only required increasing leadership responsibilities to SEAs but also redefined what a legitimate SEA should and can do; however, the legitimation demands were neither matched with SEAs' capacities nor clearly defined as to how SEAs could meet the institutional expectation to improve the education system through standards-based accountability. The how-to step became a black box with no description, and diffusion became inevitable for SEAs to do whatever they could to survive the new institutional environment as legitimate organizations. In the process, SEAs made similar changes in consolidating organizational structures and recomposing staff because these changes followed the logic of maximizing organizational capacities to fulfill SEAs' increasing responsibilities, but with limited resources. SEAs also upgraded their information systems as it is part of the institutional expectation.

Similarly, since there was no clear description of how to construct an effective data system, SEAs ended up with data systems with diverse features. SEAs also took different approaches to claim their leadership role and applied strategies in their own ways to adapt to the local context. These signs of diffusion indicate that legitimation demands lead to organizational diffusion under two conditions: 1) when there is no sufficient knowledge as to how to respond to the demands and 2) whenever it is possible to localize the demands, i.e., to appropriate legitimation demands to the organizational status quo and its local context. As individual SEAs go through the change process where isomorphism and diffusion intertwine with each other, the field of SEAs as a whole has grown to be a powerful voice in shaping education reform and adjusting institutional expectations for education.

Isomorphic change and diffusion of SEAs are two sides of the same coin; it would not be sufficient to tell either side of the story without informing the other. SEAs may go through similar processes of change but remain different as a result of negotiation and mutual adaptation between an organization's existing status and the intended change. The neo-institutional theories emphasize convergence and isomorphism under the influence of legitimation demands, but the mutual adaptation that produced a hybrid of new organizational structures indicates that legitimation demands can result in diversity among organizations as well. Some recent theoretical and empirical studies argue that legitimation demands may not necessarily lead to isomorphism but rather contribute to organizational diffusion (Beckert, 2010; Kraatz & Zamac, 1996; Washington & Ventresca, 2004). In the

case of SEAs, the process of isomorphic change does not result in an organizational prototype. Rather, a hybrid of change and existing organizational features is more likely to be created in the end through local adaptation. It is particularly true for institutionalized organizations with different histories and cultures, such as SEAs, where change is oftentimes conditioned on the existing infrastructures that can vary greatly across states.

The process of change can be simultaneously substantive and symbolic in terms of tactics.

Some believe that the main reason that NCLB gained bipartisan support was the fact that state initiatives did not bring school progress as quickly as expected, which led to a suspicion that state reforms did not bring substantive change that actually contributed to school improvement. For instance, a four-year study on state-initiated reforms in graduation requirements showed that such state-level reform initiatives were largely symbolic to pacify public dissatisfaction with educational outcomes (Wilson & Rossman, 1993). A report by the National Governors' Association also suggested that the piecemeal type state reform prior to the early 1990s did not make comprehensive changes in the education system regardless of the policy inclination toward school accountability (National Governors Association, 1991). Another example of the dispute over SEAs' change evolved around the state provision of assistance. All the interviewed states and the majority of the survey states reported their states' efforts to provide assistance to districts, but many research and media reports based on districts'

reporting tell a different story. Did SEAs only make symbolic changes to meet NCLB's requirements?

Organizational inertia is a driving force behind symbolic change in institutionalized organizations. Potential causes of inertia in SEAs can be knowledge and skill obsolescence, the bureaucratic organizational structure, and limited resources. Under the influence of organizational inertia, it is likely that organizations take symbolic change as a strategy to adapt to the new institutional environment, without any substantive changes. Symbolic change is also a likely result of loose coupling where the autonomy of individual units blocks the impact of system-wide change and leaves the functioning and operation of working units in an organization untouched.

Organizational changes through loose coupling and adaptation are often portrayed as mutually exclusive. In reality, however, it is difficult, if not impossible, to separate the two types of change process and to determine the nature of a specific change action to be substantial or symbolic. Two issues pose major challenges to differentiate the two forms of change. First, organizational changes tend to take place over a relatively long period of time during which changes can be easily overlooked. Gradual changes, particularly, tend to leave subtle traces in the organization although their cumulative effects over time can be significant. Second, even some intended symbolic change may help build up the change process and lead to more substantive changes in the organization over time. Therefore, instead of distinguishing between symbolic and substantive change, I would argue that these two forms of adaptations are not dichotomized

and static in the process of organizational change; rather, they may take turns and feed each other to allow organizations to respond to institutional environment changes in a flexible manner.

For example, although SEAs that had SBA-oriented reforms in the 1990s did not experience changes as dramatic as what happened to them after the enactment of NCLB, most of them were better prepared for implementing the federal law than states starting from ground zero. Regardless if change under state initiatives came at a slower rate or was simply symbolic, it prepared SEAs to make substantive changes to quickly respond to the federal push for SBA. Most of the interviewed state officials said that their organizational changes were driven by state reform initiatives; the federal law only accelerated the changes that were already taking place in these states. In this sense, the seemingly slow and minor changes under state reform initiatives in the 1990s prepared SEAs to make changes swiftly to respond to federal mandates under NCLB.

Either symbolic change through loose coupling or substantive change through adaptation may leave marks on organizations and propel organizational changes to respond to new institutional environment. The naming of a complex changing process becomes subjective taking into consideration that most of the time only certain aspects of change can be perceived and understood at the time of change.

For example, there has been criticism about inefficiency and incapacity in communicating within SEAs as well as between SEAs and local districts/schools. SEA officials, however, reported quite commonly about their efforts on

improving their organizations' communication efforts. If we assume that both sides are telling the truth about their experience in the SBA reform, what SEAs officials perceived as substantive change, such as the increasing awareness of and practices in cross-level communication as well as their intensified collaborative efforts within SEAs and with external constituents, may be best described as symbolic by others.

In addition to different perspectives on change, time may also redefine the nature of a particular organizational change. A symbolic change at one time can be the first step to a substantive change; a substantive change perceived at one time may only have symbolic meanings in a different institutional environment. Organizational changes in SEAs suggest that the forms of change are not an either-or; rather, they can be a combination of both symbolic change through loose coupling and substantive change through adaptation.

The changing field of SEAs has informed the reauthorization of federal policies.

The proposed theoretical framework portrays organizational change as a dynamic process. On one hand, the institutional environment generates demands for change. On the other hand, massive changes in an organizational field may shape the institutional environment that governs the field.

In the example of SEAs, the legitimation demands to lead SBA reform has pushed SEAs to change in many ways. In the meantime, the increasing leadership role has also made SEAs a powerful voice in shaping SBA policies. Some organization level change led to changes in the institutional rules directly. For example, regardless of the scripted federal requirements under NCLB, many

states pushed their agenda for meeting these requirements through alternative approaches. CEP's 2004 survey shows that, in the 2003-04 school year, 48 states proposed changes to their NCLB accountability plans to the U.S. Department of Education. Many of the proposed changes were concerned with particular technical guidance, such as the use of alternate assessments, the classification of schools making AYP, and alternative ways to meet NCLB's requirements especially for English language learners and students with disabilities. The U.S. Department of Education approved all proposed changes from 20 states and approved some changes from 27 states. One state was still waiting for a decision at the time. Based on SEAs' responses in the first year of implementing NCLB, the U.S. Department of Education adjusted certain regulations related to measuring AYP. States were permitted to use alternative achievement standards for students with the most significant cognitive disabilities, subject to a cap of 1% of all students assessed. States could seek exemptions to the 1% cap if they had a larger percentage of students with the most severe cognitive disabilities. Schools were not required to give limited English proficient students their states' regular reading tests if such students had been enrolled in U.S. schools for less than 10 months prior to the assessment. Also states could count students who had become proficient in English within the past two years in their calculations of AYP for the limited English proficient subgroup. Additionally, states could average participation rates over a two or three year period if a school missed the federal threshold of 95% participation in its most recent round of testing (CEP, 2005).

These institutional changes were mostly driven by collective bargains from the organizational field of SEAs. In 2007, CCSSO, together with National Governors Association (NGA) and National Association of State Boards of Education (NASBE), made a joint statement on the reauthorization of NCLB. The three leading state associations called for more state authority and flexibility in designing accountability systems and for broadening the options to allow states to determine consequences and interventions. They also demanded sustained resources, technical assistance, and other supports for states to develop capacities to assist schools.

SEAs have gained increasing recognition in recent years as an intermediate government agency to lead education reform. To fulfill the leadership role, however, SEAs need more resources and authority in decision-making. SEAs have sent clear messages to the U.S. Department of Education during the past eight years of NCLB demanding more resources to comply with the requirements of the federal law. The current federal Race to the Top and Innovation grants seem to echo SEAs' calls for providing more financial support on a competitive basis and allowing states to design reform plans within the framework of federal interests. With a historic \$4 billion of federal money, Race to the Top is aimed at advancing state reforms in the areas of adopting standards and assessments, building data systems that measure student growth and inform instruction, strengthening the teacher and principal workforce, and turning around low-achieving schools. The federal money has attracted considerable political attention to education in state politics when many states face a dire financial

outlook. In the process of policy transition to state competition, the importance of SEAs as a state government branch has been highlighted and elevated.

In summary, the proposed theoretical framework based on institutional theories provides an informative way to examine SEAs as an executive branch that has adjusted itself in many ways to respond to the institutional inclination toward SBA reforms. The study of organizational changes of SEAs validates the institutional effects on organizations as well as the motivation and process of organizational change. It also implies the potential connection between legitimation demands and organizational diffusion and suggests the need for refinement of the dichotomized view on the symbolic and adaptive forms of change. Based on the findings of this study, the original theoretical framework (Figure 1) has been revised to address the multi-faceted change process (Figure 8).

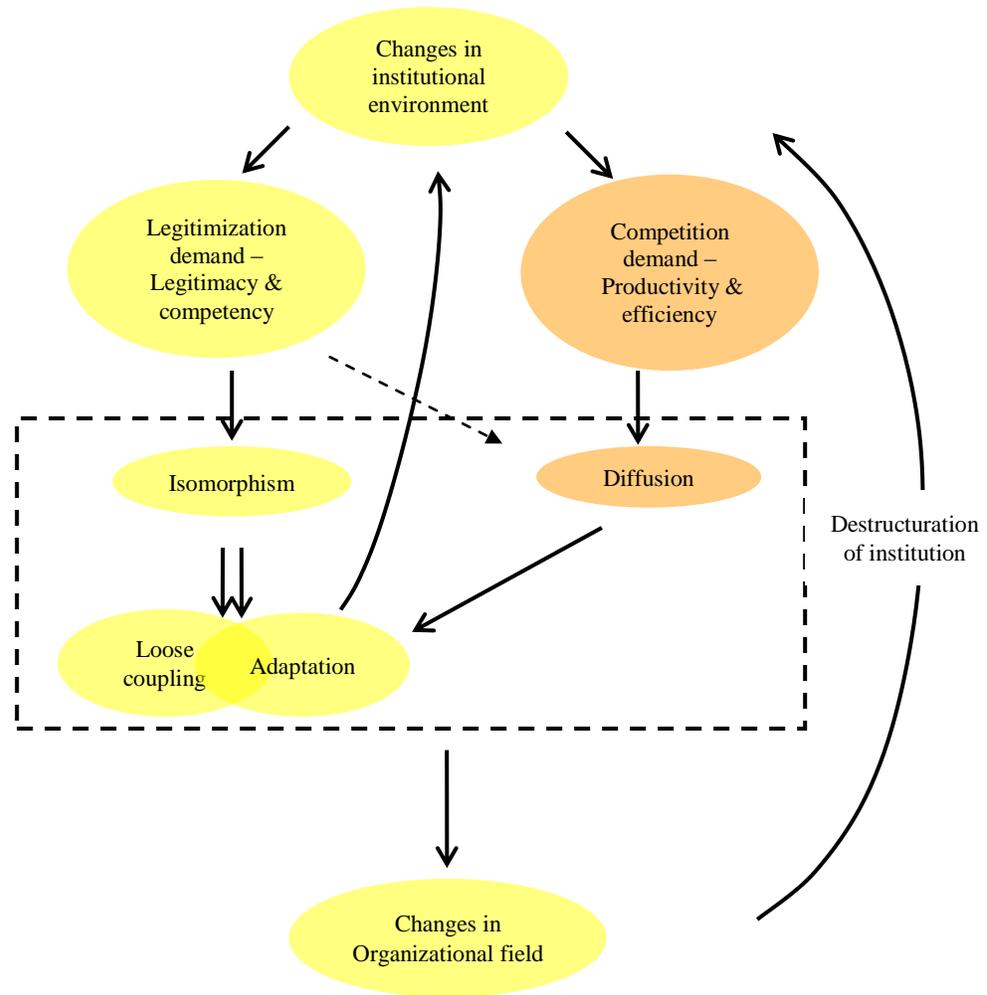


Figure 8. Revised theoretical framework for organizational change.

Figure 8 highlights competition demands that were grayed out in Figure 1 to address recent policy momentum toward state competition. Competition is not traditionally a source of demand for change for institutionalized organizations. However, the recent tie between state policy and federal monetary incentives brings competition among states to the center of current federal SBA reform initiatives. To include the competition demands in the framework not only makes the theoretical framework more comprehensive and up-to-date but also suggests potential directions for future research.

Federal Policy Transition to Competition

Besides legitimacy, institutional theories suggest competition to be another driving force for organizational change. The institutional effects of competition are mostly manifested by production organizations in their constant strive for shared resources. Sharing similar but limited resources is the greatest incentive for interorganizational competition (Hannan & Freeman, 1977; McPherson, 1983), and the performance of production organizations is often closely tied to their resources, such as market demands and partnership. For this reason, competition is less likely to be a concern for institutionalized organizations, such as government offices, because the availability of resources is independent of organizational performance.

The recent competition-based federal programs, the Race to the Top and Innovation grants, create a competitive environment where federal funding is granted based on specific criteria for state education reform plans. These grants are believed to be a trial run for the reauthorization for NCLB (Klein, 2010), and proposals from the winning states in these competitions are expected to set the example for school reform in other states. The competitive element in the federal SBA reforms has shown impact on SEAs' role, function and relations with other interest groups. For example, a first round competition winner Tennessee proposed to establish an "Achievement School District" to serve chronically low-achieving schools and enlist non-profit providers to help improve them. The District is to be operated by the state and managed by the Tennessee Department of Education through contracting school services to nationally recognized non-

profit organizations. To transform the education system from data-rich to data-driven, Delaware will hire partners where the state needs to develop expertise. One example of such partnership is to hire data coaches to work with teachers and development coaches to work with principals. The State Secretary of Education has also begun reorganizing the Delaware Department of Education (DDOE) to expand its role and make it more accountable for results as measured by student achievement. The state will establish a Project Management Office (PMO) in the DDOE to lead the reform's implementation, which consists of three units, Performance Management Team, Teacher and Leader Effectiveness Unit, and Turnaround Group. The state proposal emphasizes the reform focus on impact not compliance, and the state promises to actively support local education agencies in the implementation process and build their capacity to deliver results.

When the federal government announced the Race to the Top grant in 2009, many states decided to bypass applying for the first round of competition. One concern for states was the change they had to make to the state education policies in order to meet the competition guidelines (Robelen, 2010). The U.S. Department of Education favored states that allowed for flexible charter school growth, used merit-pay programs to evaluate teachers and principals, and implemented data systems to improve instruction. States need support from many interests groups, such as districts, teachers' unions, and the business community before making the decision whether to make changes to state policies and to participate in the competition. Local support is also considered a precondition for winning the competitive grant, the partnership between SEAs and other interest

groups, such as teachers unions, districts and schools, is emphasized more than ever before.

Few states that have won the federal grants have used the financial resource to replenish their in-house expertise; instead, they have tended to contract for external expertise and implementation services. These contractual services will help SEAs to consolidate data infrastructure and relations with local districts and schools through local capacity building. However, SEAs may still lack the capacity to directly provide technical assistance to districts and schools once the federal funding discontinues. It would be more sustainable for SEAs to continue optimizing operations and building up their capacities to establish leadership roles, but such proposals may not help states to win the grants.

Race to the Top symbolizes the height of the federal investment in public education. It offers states a unique opportunity to gain political traction for changes in state education systems and to spur dramatic political will to pass state legislation on education reform (Kubach, 2010). Its approach shifts the pivotal point of the federal policy from pure compliance to compliance with competitive incentives. The new institutional environment, to some extent, is responsive to SEAs' call for flexibility, authority and federal support. It encourages SEAs to develop innovative policy models for school improvement and supports the implementation of the winning proposals. Federal programs, such as Race to the Top and i3 funds, have pushed state departments of education to move from the legitimization framework to competition. Although participation is voluntary, states, battling with recession, are lured by federal funding and more susceptible to adapt

to such institutional changes. However, the competitive approach has shortcomings. For instance, Brill (2010) reported the lack of evidence for vetters' scores on state proposals. States may have different capacities to develop proposals or align state policy and legislature to the federal funding requirements. For the winning states, the result of their proposed plans is unpredictable because of lack of empirical evidence. It is also unclear how the implementation of the winning proposal will be monitored and evaluated.

Some institutional theorists argue that competition among organizations will lead to diffusion of organizational function, structure, operation, culture and other characteristics (Haveman, 1994; Swaminathan & Delacroix, 1991). The association between organizational diffusion and competition demands has been largely overlooked in neo-institutional theories, in contrast to the classical Weberian perspectives on competition fostering organizational bureaucracy. Empirical evidence in non-institutionalized or production organizations confirms the effects of competition on organizational change (Baum & Singh, 1994; Hannan & Freeman, 1989; McPherson, 1983). Barnett and Carroll (1995) described competition as the forgotten relative in the family – “no one denies his rights on the matter, but then no one invites him to dinner either” (p. 223) – because competition was then inadequately examined in the study of organizational change. The theoretical framework proposed in chapter two follows the logic of neo-institutional theories and, therefore, focuses mainly on the connection between legitimation demands and isomorphism. Although competition was included in the framework, it was not highlighted because

competition demand was believed to be less relevant to institutionalized organizations, such as SEAs. The recent rise of state competition through the federal Race to the Top grant and i3 innovation grant, however, seems to tie competition closer to SEAs. This institutional change suggests that the theoretical framework needs to be updated to reflect new institutional demands for SEAs to lead SBA reform.

In the recent state competition for federal grants, states presented diverse plans for state reform and assigned different functions for SEAs in implementing the plans. Some states make teacher and leader effectiveness the main theme while some focus on providing direct technical assistance. In addition to the priorities identified by the U.S. Department of Education, local support is another point strongly emphasized in the competition. Such support is often exemplified in a memorandum of understanding where districts and teacher unions agree to forfeit collective bargaining on the relevant term of pay and evaluation system for the grant money (Sawchuk & Maxwell, 2010). The diversified policy proposals may well lead to different paths of re-organization of SEAs in the implementation process.

The federal preference for the competition mode maintains the compliance nature of the federal policy, which differentiates the state competition from business competition in a free market. The design of the 2009 Race to the Top grant seems to respond to the call for more flexibility for SEAs to play leadership roles by encouraging states to develop new policy models, but not without constraints from federal guidance. The shift of the federal policy to innovation

and competition remains compliance-driven. The grant competition follows selection criteria that have spurred some policy changes at the state level. Limited by the federal emphasis on charter schools and standards, states have to follow the federal logic in drafting their proposals for a greater chance of winning (National Conference of State Legislatures, 2009). While the outcome decides the winning of organizations in a free market competition, for the competition in an institutionalized environment, compliance to institutional rules is equally, if not more, important in winning the competition.

Parallel to the Race to the Top grant competition, common standards reemerge as a catch phrase in the national forum. Forty-eight states have signed on to the Common Core State Standards Initiatives to better position themselves for the Race to the Top grant. Compared to their previous appearance in the early 1990s, states show more buy-in and willingness to participate (Ravitch, 2010) — 46 states agreed to join forces to create common academic standards in mathematics and English language arts in 2009 and 34 states agreed to adopt these standards as of August 6th, 2010 as part of their state policies to substitute the revision of states' own academic standards (McNeil, 2009; Sawchuk, 2010; Zehr, 2009). Although the adoption of common standards is voluntary, it is a prerequisite for applying for the federal Race to the Top funds and may well determine future Title I funding for states (Finn, 2010). The common standard requirement is another example that illustrates the compliance-driven nature of the state competition.

Conclusion

The implementation of SBA has not only driven organizational changes in SEAs but also shifted the power structure and the bureaucratic accountability in the educational system. Bureaucratic accountability refers to the accountability with respect to superordinate-subordinate relationships (Lunenburg & Ornstein, 2004). Schools and districts have become increasingly accountable to SEAs while accountability to governors, state legislators, federal and other national constituencies drives accountability frameworks. The tension between districts and states in the beginning years of NCLB and the ongoing confrontation between states and teacher unions on teacher evaluation formulas illustrate the ideology collision and power struggle under the influence of SBA.

Past efforts in education reform suggest that school improvement relies on cooperation among interest groups – SEAs, LEAs, teachers and administrators. The emphasis on local buy-in in the Race to the Top grant reflects the lessons learned from past reforms – to lead the reform, states have to reach consensus among interest groups within the states. State partnership has become the main theme in the SBA reform, and SEAs' leadership role is central no matter if partnerships are built on federal investment or through collaboration with LEAs and other interest groups.

The examination of organizational change in SEAs illustrates the impact of SBA policy on educational organizations. It echoes research on institutional influences, particularly government regulation, contained in organizational fields (Edelman, 1992; Dobbin & Sutton, 1998; Edelman et al., 1999). Such impact on

policy delivery organizations has not been widely recognized, as research attention is often directed to the policy receiving organizations, such as schools and districts. The policy impact on the delivery organizations as illustrated in this study, however, suggests an additional layer of potential complication and cost of policy implementation. Many SEAs took detours and learned the hard way how to take on the entitled leadership role in the SBA reform. The frustration of implementing top-down policy may hurt SEAs' motivation to take action, and increase the hidden cost for staff, time and resources, which feed the negative public image of SEAs as inefficient, bureaucratic organizations. SEAs' transformation and struggle in adapting to the changing institutional environment provide insights to understand challenges in policy implementation and reveal the lack of organizational knowledge in the design of top-down SBA policy. In the meantime, SEAs' varied responses to the law has helped construct the institutional environment and shaped the standards in the organizational field, which further highlights the importance of SEAs as a powerful organizational field in steering the political process of SBA institutionalization. If NCLB had been better informed about the status quo of SEAs and made corresponding adjustments to accommodate their organizational needs, the federal law might have encountered less resistance and elicited more commitment from SEAs. The RT3 grant has demonstrated a great emphasis on SEA's organizational structures, such as capacities and relationship with local entities, in determining the feasibility of reform plans and the probability of successful implementation. The reauthorization of NCLB should be informed by lessons from the past and more

consideration of the organizational infrastructure building of the policy delivery organizations, such as SEAs. Specifically, the analysis of organizational change in SEAs suggests the following recommendations for standards-based reforms:

1. Develop a capacity measure for policy delivery organizations, such as SEAs, to inform policy design and gauge potential challenges for implementation. In the early years of implementing NCLB, many SEAs were frustrated by their limited capacities to fulfill the increasing federal demands. This has been cited as a major contributing factor in the push-back against the federal law. It suggests the importance of capacity building in policy delivery organizations as a strategy for effective policy design.
2. Include organizational change as an important part of policy evaluation and implementation analysis. This study suggests that, during policy implementation, the impact of standards-based accountability is not only at the school level. The intermediate organizations and the infrastructure of the country's education system may be changed. These macro-level changes signify a different aspect of policy impact and may provide valuable insights to future policy design.
3. Provide professional development opportunities to enhance SEAs' technical capacity; adjust salary scales to attract competent professionals to SEAs. The pressing needs for professional staff in teaching, technology and management pose great challenges to SEAs' legitimacy and leadership roles. As contractual employment provides only a short-

term solution, how to attract and maintain competitive staff remains a question to be answered.

4. Strengthen organizational relationships across bureaucratic hierarchies through collaboration and communication. More and more, SEAs realize the importance of local collaboration in establishing leadership roles. Such cross-level collaborative relationships, however, remain contested by many conflicts of interest. How the three tiers of governance in education (federal, state and district) work together is key for an effective SBA system.
5. Encourage local innovation to improve organizational productivity with results- oriented, rather than compliance-driven education policies. Recent federal funding strategy as manifested in RT3 and i3 not only encourages innovation in education but also creates the needs for SEAs and local districts and schools to work together. With strings attached, such a strategy seems to have a better chance to address local needs and win local buy-in, which is indispensable for successful policy implementation.

SBA policies at both state and federal levels have re-engineered the education system by shifting its power upward. Organizational changes in SEAs manifest a system-wide transition in the field of education, and potential sources of tension in school reform. Understanding policy delivery organizations is an important but often overlooked step in policy design. The competition model in current federal programs gives more flexibility to states in forming their own

reform plans within the federal framework. The evaluation process takes organizational capacity and partnerships into consideration to ensure that proposed plans are feasible. Such processes allow states to build consensus with other state and local constituents to make sustainable plans for school reform.

Limitations and Future study

This study explores the features of organizational change of SEAs and makes an argument that such change is important to our understanding of SBA reform and its impact on the education system. Since this is a secondary analysis of data, it must involve careful selection of relevant data to address the research questions. In this sense, the data sources were limited to elaborate themes in greater detail and to provide evidence for some brief but interesting arguments by SEAs officials. The study would have benefited greatly from more in-depth single case studies to flesh out details of such changes, particularly in the context of organizational history and local politics. Similarly, the survey data can be more informative if more questions that directly address the organizational change in SEAs were included and repeated over time.

Additionally, neither the interview protocol nor the survey instrument sets specific time stamps; as a result, changes in SEAs reported by the state officials reflect different time points at which they witness change and the length of time for changes to take place. This, together with the complex state context, makes it hard to compare organizational strategies to tell which strategy is more effective to bring about change.

The measure of change is by no means comprehensive; many important aspects of changes, such as the internal distribution of resources and the organizational culture, were not included or addressed fully. Future studies on organizational change in SEAs may expand the understanding of SEAs' change through a different set of organizational characteristics. For instance, in thinking of the current trend of competition for federal funding, a comparative case study of SEAs winning and not winning the federal grants will give great insight as to how the competition trend under Race to the Top impacts the function and operation of SEAs in comparison to the legitimization demands under NCLB. The outcomes for state education systems may be closely associated with the way SEAs organize themselves to work with local districts and schools under two different kinds of institutional environments discussed in this study, one based on legitimation and the other leaning toward competition.

Understanding policy delivery organizations, such as SEAs, can be a helpful resource for designing studies on organizational effects using multi-level analysis techniques. For example, the characteristics of educational organizations may help identify organizational variables that influence students' school experience. Does the collaboration between states and districts have positive effects on students' learning? Do states winning the Race to the Top grant show higher rates of improvement in school performance than states that did not? Does a state get better return on student achievement when hiring external experts to train teachers in comparison to local exchange of experience among educators? Answers to these questions about the effects of state policies rely on a good understanding of

SEAs so that robust variables can be incorporated into the analytic models.

Additionally, the formulation of competition among states opens the door to examining new possible modes of governance in SEAs, tensions, and the structure of relationships among SEAs as well as between SEAs and other interest groups.

Appendix A: Characteristics of Field Study Sample

	Geographic Location	Estimated Public School Enrollment 2007	Ratio of Title I to Non Title I Schools 2006-07	Estimated Per-pupil Education Expenditures 2007-08	Percentage of Total State Budget for Education FY 2007)	State Rating Other Than AYP (Dual Accountability)	State Provide Assistance to Low-Performing Schools 2006-07	State Achievement Index Rank 2007	Percent of Rated Districts “In Need of Improvement” 2006-07
State 1	South	735,000	8.6	\$9,237	13.4%	No	Yes	The lowest quartile	33%
State 2	South	124,000	1.4	\$13,894	33.9%	Yes	Yes	The second highest quartile	11%
State 3	South	688,000	8.9	\$10,020	19.6%	Yes	Yes	The second lowest quartile	52%
State 4	Northeast	965,000	0.8	\$14,588	14.5%	Yes	Yes	The highest quartile	42%
State 5	Midwest	913,000	0.5	\$9,179	23%	No	No	The second lowest quartile	0%
State 6	Midwest	291,000	0.7	\$9,179	16.1%	No	Yes	The second highest quartile	<1%
State 7	Northeast	152,000	0.9	\$12,464	15.2%	Yes	Yes	The lowest quartile	17%
State 8	Midwest	846,000	0.5	\$11,434	19.1%	No	Yes	The highest quartile	<1%

State 9	South	868,000	6.0	\$12,706	18.9%	No	Yes	The second highest quartile	8%
State 10	Northeast	2,806,000	0.9	\$15,932	20.1%	Yes	Yes	The second highest quartile	Data unavailable

Source: U.S. Census Bureau, Common Core of Data, State of the states, Education Vital Signs, 2009, Education Week, 26 (15), 2006 and Education Week, 26 (17), January 4, 2007.

Appendix B: Interview Protocols

1. Today, when people, particularly those in Washington D.C., think about SEAs, they automatically think of NCLB implementation responsibilities. How would you describe SEAs so that people would have a more complete picture of what an SEA does?
2. In what ways are SEAs organized (both in structure and function) differently today than when you started at the SEA?
 - a. Were any of these changes prompted by NCLB?
3. In what ways has the relationship between SEAs (in terms of roles and responsibilities) and LEAs changed?
 - a. How have you organized the SEA to provide assistance to the lowest performing schools and districts?
4. Can you talk about the ways in which systems for collection and use of data (including state and federal legislative requirements and capacity issues) have changed over the past decade?
5. Is the way you would characterize your SEA's relationship with the state legislature and governor (e.g., legislative initiatives) today different from when you began?
6. How have human and financial resources to support staff and programs changed?
 - a. Do SEAs have sufficient human resources to carry out NCLB?
 - b. What are some of the challenges you face in implementing NCLB with regard to human resources?
7. Do you believe your SEA currently has the capacity to carry out NCLB effectively? Why or why not?
8. How does your SEA work with other partners to support implementation of NCLB and other state initiative (i.e., Comprehensive Centers, Educational Labs, business partners, community based organizations, national organizations, etc.)

Appendix C: Initial Within-Case Coding

Theoretical Framework	Code	Code Definition
Institutional change	Set	1. Setting/context: the larger context of the case
Institutional change	Def	2. Definition of the situation: informants' perception of SEAs' changes
Legitimization; competition	Pro	3. Process: sequence of events, flow, transitions and turning points
Loose coupling; adaptation	Str	4. Strategies: tactics, methods, techniques to accomplish things or meet their needs
Field change	Rel	5. Relationships and social structure

Appendix D: Cross-Case Coding

Main Code	Code	Connection with Within-Case Analysis	Subcode
Institutional changes	INS	within-case analysis code 1	<ul style="list-style-type: none"> • Federal • State
Legitimization demand	LEG	within-case analysis code 1	<ul style="list-style-type: none"> • Across organizational level • Within organizational level
Competition demand	COM	within-case analysis code 1	<ul style="list-style-type: none"> • Across organizational level • Within organizational level
Loose coupling strategy	LC	within-case analysis code 3, 4, 5	<ul style="list-style-type: none"> • Internal structure • Internal procedure • External relationship • External procedure
Adaptation strategy	ADA	within-case analysis code 3, 4, 5	<ul style="list-style-type: none"> • Internal structure • Internal procedure • External relationship • External procedure
Capacity	CAP	within-case analysis code 2	<ul style="list-style-type: none"> • Personnel • Finance • Technology • Others

Appendix E: N-Vivo Interface for Within-case Analysis

The screenshot displays the NVivo 8 software interface. The main window is titled "SEAs Interview.nvp - NVivo". The interface is divided into several sections:

- Nodes Panel (Left):** A tree view showing "Free Nodes" selected, with sub-items like "Tree Nodes", "Cases", "Relationships", "Matrices", "Search Folders", and "All Nodes". Below this are other analysis tools like "Sources", "Sets", "Queries", "Models", "Links", "Classifications", and "Folders".
- Free Nodes Table (Top Center):** A table listing nodes with columns for Name, Sources, References, Created On, Created By, Modified On, and Modified By.

Name	Sources	References	Created On	Created By	Modified On	Modified By
1. Set	10	342	3/15/2010 12:56 PM	YZ	4/19/2010 5:04 PM	YZ
2. Def	10	438	3/15/2010 12:56 PM	YZ	4/19/2010 5:04 PM	YZ
3. Pro_Mot	7	54	3/15/2010 12:56 PM	YZ	4/17/2010 1:33 PM	YZ
4. Str	10	155	3/15/2010 12:57 PM	YZ	4/19/2010 5:04 PM	YZ
5. Rel	10	314	3/15/2010 12:58 PM	YZ	4/19/2010 5:04 PM	YZ
Informant bakground	7	13	3/25/2010 7:48 PM	YZ	4/6/2010 2:30 PM	YZ
- Node Detail View (Bottom Center):** A detailed view of the selected node "4. Str". It shows two references:
 - Reference 9 - 1.59% Coverage:**

The major change, and I think was a positive one, was the peer review process for assessment. We've had a highly regarded assessment system, but the peer review found that some details, namely the way we assess performance for children with severe disabilities, the way we assess performance for English language learners, did not pass muster and so we had to make some changes there. Some we agree with and some we've disputed, but the external discipline of a peer review was very helpful.
 - Reference 10 - 1.36% Coverage:**

So we built capacity by creating new relationships among structures, by adding technology, and really creating relationships between, for example, a central organization and the regional units. As I tell my colleagues, if you think you look small, folks just on the nearby, you only have 3,000 people in this big state. But if you focus on our intermediate units, there are 30,000. How is
- Bottom Panel:** Includes tabs for "Annotations", "Relationships", and "See Also Links". Below these is a table with columns "Item" and "To Folder".
- Taskbar (Bottom):** Shows the Windows taskbar with the Start button, system tray, and open applications including NVivo 8, SEAs Interview.nvp, and Adobe Photoshop. The system clock shows 11:00 PM.

Appendix F: N-Vivo Interface for Cross-case Analysis

The screenshot displays the NVivo 8 software interface for cross-case analysis. The main window shows a tree view of nodes, with a search bar at the top and a list of nodes below. The nodes are organized into a hierarchy, with 'Tree Nodes' selected in the left sidebar. The search bar is set to 'Tree Nodes' and 'Find Now' is visible. The main window displays a table of nodes with columns for Name, Sources, References, and Description.

Name	Sources	References	Description
Content of Change	10	437	Perceived changes by informants
Content - External function	10	96	What SEAs have done differently to external organizations to perform their functions; how to work with other organizations
Content - External relationship	9	92	changes in relationship between SEAs and other organizations
Content - Internal function	10	98	changes in how SEA work internally; how to coordinate within the SEA to perform functions
Content - Internal structure	10	108	changes in internal structure
Institutional Setting	10	342	
Competition demand	0	0	
Endogenous competition demand	3	10	Demands rise from competition between SEAs
Exogenous competition demand	7	17	Competition demands from other organizations that are not SEAs, e.g. districts, to see if SEAs perform better for resources
Institutional change	9	39	Institutions are rules. How do the rules change that SEAs rely on to play their roles
Federal level institutional change	9	72	Institutional change at the federal level
State level institutional change	10	79	Institutional change at the state level
Legitimation demand	1	1	
Endogenous legitimation demand	0	0	Legitimation demands rise from the field of SEAs
Exogenous legitimation demand	10	96	Legitimation demands rise from field other than SEAs, e.g. federal government, districts and schools, media and research institutions; exter
Responsibilities	10	36	Responsibility beyond NCLB implementation
Unaddressed challenges posed by	10	106	Challenges SEAs having difficulties addressing or trying to tackle in the future in implementing NCLB
Motives of Change	7	54	What drives the change? The impetus and important events that lead to S
NCLB-related motives	3	9	Process and motives of change in function due to the federal requirements of NCLB
State level motives	7	33	Process and motives of change in functions prior to or not directly related to NCLB
Relationship	10	314	Internal structure within a SEA and external relationship with other organiz
Strategy of change	10	156	
Strategy - External function	10	66	How SEAs redefine their function and responsibilities to other organizations, specifically local districts and schools
Strategy - External relationship	9	21	How SEAs change their relationship with other organizations
Strategy - Internal function	8	36	How SEAs change their functions and redefine their responsibility and focus
Strategy - Internal structure	6	36	How SEAs change their internal structure

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