Getting Down to FACTS

The Hidden, Guiding Hand of Compliance in California Public Schools

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May 2026

Stanford | SCALE Initiative
Accelerator for Learning

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Abstract

California education administrators devote a substantial share of their workweek to compliance activities required by state and federal law. Using survey data from 909 local educational agency (LEA) administrators across California's 58 counties, this study provides the first statewide estimates of the magnitude, distribution, and perceived value of compliance work a decade after the adoption of the Local Control Funding Formula (LCFF), a finance, accountability, and governance reform that is intended to reduce mandated activities on LEA administrators and increase local control over decision-making.

We estimate that central office administrators spend approximately 20 hours per week on compliance activities—about 39% of their typical workweek—amounting to roughly 151,000 hours statewide per week. At prevailing compensation levels, this represents an estimated annual opportunity cost of between $2.73 billion to $3.56 billion in personnel time.

Compliance work is concentrated in a small number of activities, with special education, financial reporting, the Local Control and Accountability Plan (LCAP), student support programs, and human resources accounting for 42% of total compliance hours.

Administrators report higher burden than value ratings for most measured compliance activities. Across 19 activities with sufficient sample size, 15 are rated as having a statistically significant negative net rating (value minus burden < 0), with public records requests, federal finance reporting, and state-mandated plans (other than LCAP) among the most negatively rated. At the same time, administrators allocate more time to activities they perceive as valuable: moving from the lowest to the highest value rating is associated with approximately 1.3 additional hours per week spent on an activity, even after accounting for differences in activities and overall compliance workload.

To clarify why some requirements are experienced as governance-supporting while others are experienced as burdensome, we distinguish between perceived governance benefits (equity assurance, accountability, continuous improvement, and local control) and compliance friction (duplication, distraction from student priorities, reduced engagement, and reduced planning capacity). Factor analysis confirms these as related but separable dimensions. Activities such as the LCAP are often viewed as governance-relevant but also generate substantial compliance friction, while other activities generate friction with little perceived governance benefit. Role and organizational context further shape experience: the same activity may be perceived differently depending on who is responsible for the work and how it is implemented.

Overall, the findings document both the scale of compliance work in California public education and the conditions under which compliance activities are experienced as governance-supporting versus burdensome in the post-LCFF era.

Acknowledgements

Deep appreciation to the 1,400 public education administrators that took time out of their busy schedule to take this survey – without which none of this analysis and insight would have been possible. Gratitude to my colleagues in Humboldt County at the county office of education, school districts and charter schools that supported the pilot of the survey instrument and early analytical frame that were used for this study. Their insight from beginning to end fundamentally helped to shape this statewide work. Appreciation to Sara Pietrowski (California Association of School Business Officials), Lindsay Tornatore (California County Superintendents), and Diana Vu (Association of California School Administrators) for their support in shaping the outreach, marketing, and communications to California administrators that encouraged them to take this survey. This report benefited from the wisdom, historical knowledge, and insight of various colleagues including Jannelle Kubinec, Kelsey Krausen, and Sean Tanner.

Introduction: Compliance in Public Education

The Problem

In 2013, California adopted the Local Control Funding Formula (LCFF), eliminating dozens of categorical programs and reducing associated compliance requirements as part of a broader major shift in school funding and accountability policy. The legislation aimed to reduce "red tape" and allow educators to focus more on teaching and learning rather than paperwork (Senate Bill 91, 2013). More than a decade later, however, education administrators report substantial compliance workload, raising questions about how regulatory demands have evolved under LCFF.

Recent policy developments indicate that administrative tasks imposed by both state and federal policies have expanded over time. In this study, compliance activities refer to tasks such as filling out a state-required form that is submitted to the California Department of Education, tracking detailed expenditures for a specific program, or submitting a dataset about a specific state funding source to the state. Willis (2026) documents growth in the number of significant laws, regulations, and reporting requirements affecting local education agencies (LEAs) and their staff. This pattern may reflect the cumulative effects of policymaking across multiple venues and governance levels in response to exogenous factors. Because policymaking often occurs in silos, the cumulative compliance demands placed on LEAs can be difficult to track (Willis et al., 2025).

This study provides systematic, statewide evidence of compliance workload in California public education and examines how administrators perceive the value and burden of that work in relation to the goals of equity, local control, and accountability. It contributes to the literature on policy implementation by focusing on the implementers themselves: the education administrators responsible for translating legal and procedural requirements into day-to-day organizational practice.

In this study, education administrators are central office leaders rather than school-based staff. They include superintendents, chief business officers, directors of curriculum and instruction, special education administrators, and other district- and system-level leaders. These administrators are responsible for a wide range of operational and support functions, including staffing, budgeting,

program oversight, facilities management, and school support. The compliance activities investigated in this study are carried out alongside those broader responsibilities.

Using survey data from 909 education administrators, we estimate that California's LEA administrators collectively spend approximately 151,000 hours per week on compliance activities — equivalent, as one illustration of opportunity cost, to providing a 15-minute weekly check-in for every vulnerable student in the state. At an estimated annual opportunity cost of between $2.73 billion to $3.56 billion, compliance represents a substantial expenditure of personnel time, yet we have little systematic evidence on how administrators view the governance benefits of these activities relative to their costs and practical burdens. As one district superintendent described: "I became a superintendent to work with kids and help teachers grow. Now I'm a professional form-filler."

Time devoted to compliance may reduce the time available for instructional leadership, strategic planning, and direct support for schools, teachers, and students. At the same time, some compliance activities may serve important governance functions by supporting accountability, equity, fiscal stewardship, and continuous improvement.[1]

A central concern is whether compliance demands are well aligned with the purposes California's accountability system is intended to serve. Compliance requirements that absorb substantial organizational capacity and are experienced as duplicative, distracting, or low-value may be at odds with LCFF's intended balance between accountability and local control. To assess this possibility, this study measures both reported compliance workload and administrators' perceptions of the value and burden of major compliance activities.

Research Questions

This study asked several research questions:

1. How much time do California LEA administrators spend on compliance activities, and to what formal requirements (laws, regulations, and/or programs) do they attribute those activities?

[1] Vulnerable students are defined here as foster youth, homeless, English learners needing intensive support, and students with disabilities requiring significant intervention. Weekly is def,ined here as within the typical school year, or 40 weeks.

2. What is the opportunity cost of LEA administrator time spent on compliance activities?

3. What purposes do these compliance activities serve to advance an effective California public education system and when are they experienced as burdensome or duplicative?

Overview of Approach

This study draws on a statewide survey of California local educational agency (LEA) administrators conducted in late 2025. Respondents included superintendents, chief business officials, special education directors, and other central office leaders from school districts, county offices of education, charter schools, and special education local plan areas (SELPAs). The survey was designed to capture both the magnitude of compliance work and administrators' experiences with the activities required under state and federal accountability systems.

Measuring Compliance Time

Administrators reported the number of hours they typically spend each week on compliance-related tasks. They then allocated this time across a defined set of compliance activity categories, including special education requirements, budget reporting, the Local Control and Accountability Plan (LCAP), audits, staffing, and other mandated plans and reporting processes. These responses allow us to estimate overall reported compliance workload and the distribution of reported time across activities. All time-use measures are self-reported and may be subject to recall bias; we therefore report sensitivity analyses applying conservative adjustments (Appendix 4.4).

To generate statewide estimates, we applied post-stratification weights to align the sample with the statewide administrator workforce by LEA type, region, and role. Additional details on sampling, weighting, and nonresponse adjustments are provided in Appendix 2.

Measuring Perceived Value and Burden

For each compliance activity, administrators rated two core dimensions: perceived value and perceived burden. Perceived value refers to the extent to which the activity supports equity,

accountability, continuous improvement, or local control. Perceived burden refers to the extent to which the activity feels administratively costly, distracting, duplicative, or difficult to implement. We summarize these ratings using a net value measure (value minus burden), allowing us to compare activities that are viewed as more governance-supporting with those that are primarily burdensome.

To further clarify what administrators mean by “value” and “burden,” the survey included eight additional items that capture two distinct constructs: governance benefits (e.g., supporting equity and improvement) and compliance friction (e.g., duplication and distraction from student-focused priorities). Factor analysis indicates that these items load onto two correlated but distinct dimensions. This distinction helps clarify why some activities may be viewed as important to governance while still being experienced as administratively difficult or burdensome in practice.

Background and Literature Review

Administrative Burden in Public Services

Moynihan, Herd, and Harvey (2015) provide foundational work on administrative burden. Their work focuses primarily on the burden that service recipients face when interacting with government programs; however, the same framework is increasingly relevant to public sector professionals responsible for implementing policy. The work highlights multiple dimensions of costs beyond financial burden, including learning costs (understanding rights and rules), compliance costs (meeting bureaucratic demands), and psychological costs (stress, frustration, and feelings of disempowerment).

The current compliance landscape reflects decades of regulatory accumulation rooted in years of policy development. McGarity's (1985) historical analysis of federal rulemaking documented how the shift from adjudicatory procedures to rulemaking in the 1970s produced a "rulemaking revolution" that dramatically expanded regulatory reach. Yang and Wang (2024) extend Moynihan et al.’s work in the era of regulatory rulemaking, categorizing the antecedents of administration into state factors (e.g., policy design, bureaucratic procedures) and individual factors (e.g., administrative capacity). Peeters (2020) offered further distinction between intentional and unintentional origins of burden and between formal and informal mechanisms. See Appendix 4 for further discussion.

In education, for example, the proliferation of categorical programs in California in the 1990s created distinct compliance streams for each funding source (RAND, 2009); No Child Left Behind (2002) introduced substantial new testing, reporting, and accountability requirements; and the IDEA reauthorizations added layers of procedural requirements for special education programs. These represent formal mechanisms with intentional origins of burden as Peeters (2020) would describe. This literature on historical accretion has focused primarily on citizens, while comparatively little attention has been paid to the administrative burden borne by public-sector professionals responsible for implementing policy.

Compliance as “System Drag”

Building on administrative burden theory (Moynihan et al., 2015) and scholarship on the origins and mechanisms of burden (Peeters, 2020), this study uses the concept of “system drag” as an organizational-level extension of administrative burden to interpret how accumulated compliance requirements may absorb administrative time, attention, and coordination capacity in public education.

System drag operates through several mechanisms. First, compliance draws on organizational attention, a scarce resource (Ocasio, 1997). When compliance activities command substantial administrator time, strategic planning, innovation, and adaptive problem-solving may receive less attention, not because they are valued less, but because immediate compliance obligations demand response first then leaving little to no time for other activities. Second, compliance work often involves rule interpretation, risk assessment, and process navigation, which can create a heavy cognitive load for leaders, particularly when the volume of compliance activities grows. The cumulative cognitive load may reduce the mental resources available to administrators for complex, creative problem-solving in their core educational work. Moreover, when educators perceive compliance work as disconnected from their core professional identity (supporting students, developing teachers, leading schools), these requirements may generate what organizational psychologists call "illegitimate tasks" (Semmer et al., 2015). Prior research suggests that such tasks can contribute to strain and emotional exhaustion (Eatough et al., 2016). More broadly, compliance requirements that emphasize process adherence and

sanction risk may encourage risk-averse behavior in organizational settings characterized by auditability and the threat of sanctions (Power, 1997). See Appendix 4.1 for further discussion.

Importantly, system drag refers not simply to workload volume but to effort diverted from core educational work to regulatory maintenance. Compliance activities that generate learning, improve equity, or enhance accountability may yield governance benefits that outweigh their costs; others, perceived as duplicative or primarily symbolic, may be experienced as drag.

This framework generates observable predictions. If compliance activities are perceived as valuable governance mechanisms, administrators should rate them as high-value and devote effort to them. Conversely, if compliance has accumulated into system drag, we should observe substantial time devoted to activities perceived as low-value (duplicative, distracting from quality implementation, or crowding out community engagement), alongside reports that compliance reduces capacity for core educational work.

Evidence of Compliance Burden

Systematic documentation of compliance burden among public education administrators remains sparse, but available evidence suggests the problem is substantial. Namely, studies have examined school-level administrators, such as principals, or investigated a specific type of administrative activity in schools, e.g., special education regulations, offering a snapshot of experiences with compliance activities.

Horng, Klasik, and Loeb's (2010) observational study of Miami-Dade principals found that approximately 30% of principals' time was devoted to administrative tasks, including activities categorized as "fulfilling compliance requirements." Analysis of National Teacher and Principal Survey (NTPS) data a decade later similarly indicates that public K-12 principals spend approximately 30% of their time on "human resource/personnel issues, regulations, reports, and school budget" activities (NTPS, 2020).

Federal compliance burden estimates are substantial even for narrowly defined requirements. The Civil Rights Data Collection generates an estimated 1.76-2.29 million burden hours annually

nationwide; EDFacts reporting adds approximately 126,880 hours; and IDEA Part B SPP/APR contributes another 107,400 hours (NTPS, 2020). These figures exclude time spent interpreting guidance, attending required training, responding to monitoring visits, and preparing for audits, suggesting that these official estimates do not capture the full scope of compliance-related work.

The Government Accountability Office (2012) documented that state and local education leaders across five states identified multiple federal requirements as burdensome, including: overlapping data requests across programs, short timelines relative to decision cycles, requirements for narrative documentation when data were already submitted electronically, and mandates that failed to account for LEA size or capacity. Critically, administrators reported that the burden stemmed not from any single requirement but from the cumulative volume and the need for coordination across programs. However, most existing estimates focus on specific federal requirements or individual roles, rather than capturing the full compliance workload across a statewide administrative workforce.

Overall, prior research indicates that administrative burden is both measurable and potentially cumulative, but it provides limited systematic evidence of its scale within large state education systems such as California.

Compliance in California Public Education

California's current compliance landscape can be situated within the design and implementation of the Local Control Funding Formula (LCFF). Assembly Bill 97 (2013) eliminated dozens of categorical programs and their associated reporting requirements, consolidating them into a simplified funding formula intended to reduce administrative complexity and provide districts with greater flexibility. The reform's architects emphasized reducing "red tape" and enabling local educators to make context-appropriate decisions (Senate Floor Analysis, AB 97, 2013).

At the same time, LCFF introduced new accountability structures. The LCAP was developed as a three-year strategic planning document aligned with eight state priorities and shaped through engagement with educational partners. Early implementation studies noted that LCAP templates risked becoming compliance-oriented if not carefully designed (PPIC, 2015). Administrators have reported

that LCAPs can become lengthy and duplicative of other required plans, including School Plans for Student Achievement (SPSA), School Accountability Report Cards (SARC), and federal addenda, with weaker connections to genuine strategic planning processes.

In the years following LCFF's adoption, additional programs and reporting obligations have been added to this framework. These include the Expanded Learning Opportunities Program (ELOP), Arts and Music in Schools funding (Proposition 28), Community Schools implementation requirements, universal transitional kindergarten (UTK) enrollment reporting, and numerous one-time grants, each with distinct allowable uses and documentation requirements. Federal requirements under ESSA have added further reporting components, including per-pupil expenditure disclosures and Title program compliance materials. Other policy briefs and targeted surveys have documented some of these impacts, including labor and time costs, declining report quality, and reduced staff morale (CSBA, 2024; Willis, Krausen, Nakamatsu, and Caparas, 2022). Even these limited investigations spurred policy action culminating in Assembly Bill 1314, which required the California Department of Education (CDE) to publish an inventory of all reporting requirements. The report resulted in an inventory of compliance requirements that exceeded 50 pages, many of those established decades ago.

This historical accumulation reflects what McGarity (1985) described as "regulatory sediment," in which requirements from different policy eras layer over time without corresponding removal of outdated mandates. As new priorities generate additional documentation, older requirements often remain in place, producing a complex compliance environment, especially for districts without specialized administrative capacity.

The administrative burden that California education administrators report in this study does not arise out of nowhere. A companion analysis of regulatory infrastructure (Willis, 2026) documents the structural origins of this burden and the accumulated regulatory sediment over the past decade. This investigation analyzed various steps in the policy inscription process, i.e., the established steps by which a law is translated into regulation (accounting codes to track the use of funds), implementation (planned activities in the LCAP), and monitoring (audit requirements). The analysis shows notable growth across all of these steps:

- A 27 percent increase in print-equivalent pages of Education code between 2019 and 2025,
- An additional 30 programs funded in non-LCFF funding for education between 2015 and 2025,
- An increase in resource codes for fund accounting from 77 to 116 between 2019 and 2024,
- A 463% growth in the LCAP instruction text between 2015 and 2025, and
- An increase in audit findings associated with state program and fiscal requirements, which currently represent 9 in every 10 findings for LEAs.

These data provide a traceable, empirically measurable pathway from policy intention to administrative experience. Analyzing these data together, we find that California public education has experienced a systematic increase in formal compliance requirements over the past decade.

What remains unknown is the overall compliance workload across California's education administrative workforce, which activities consume the greatest share of time, and how administrators assess the governance value of this work relative to its burden. The present study offers a systematic assessment of compliance burden in the post-LCFF era, documenting not only the time and cost associated with reporting obligations but also administrator perceptions of whether these requirements serve their intended governance purposes or are perceived as primarily performative documentation.

Data and Methods

Survey Design and Data Collection

This study draws on the California Education Administrator Compliance Survey, a statewide survey conducted between October 2, 2025, and December 15, 2025. The survey was designed to measure administrators' self-reported time devoted to compliance activities and their perceptions of the value and burden associated with these requirements.

The sample frame was constructed using two approaches. First, administrative contract rosters were obtained from the California Department of Education's publicly available data for each local education agency (LEA) as of June 30, 2025. Second, these lists were verified and supplemented using

lists in partnership with several statewide associations, including the California Association of School Business Officials (CASBO), the California County Superintendents (CCS), and the Association of California School Administrators (ACSA).

The target population consisted of approximately 7,569 education administrators employed in California local educational agencies (LEAs) at the Central Office level, including school districts, charter schools, county offices of education (COEs), and special education local plan areas (SELPAs). These administrators were distributed across a clean analytic frame of 2,499 LEAs. The survey sampling did not include school-level administrators such as principals, assistant principals, or equivalent positions. Eligible administrators held positions with involvement in compliance and reporting responsibilities, including superintendents, assistant superintendents, chief business officials (CBOs), directors of curriculum and instruction, federal and state programs coordinators, special education directors, COE-level administrators, and administrative support staff.

We employed a stratified sampling design with counties as primary strata (N=58) and secondary stratification by LEA type (district, charter, COE, SELPA), enrollment size (six bands: <500, 500-1,000, 1,000-2,500, 2,500-5000, 5001-10,000, >10,000 students), and geographic locale (city, suburb, town, rural). To ensure adequate representation of small and rural LEAs, we applied oversampling rules and set minimum target completes for each county based on the estimated number of education administrators. Using finite population correction and assuming a design effect of 1.5, we estimated that 750 completed surveys would yield statewide estimates with a margin of error of approximately ±5% at the 95% confidence level.

Recruitment of survey respondents was conducted in close partnership with the associations listed above: CASBO, CCS, and ACSA. Survey invitations were distributed via email to approximately 7,500 education administrators. Prior to the survey launch, partner associations hosted informational webinars that described the study's purpose and encouraged participation. We sent reminder emails approximately every 2 weeks. In the final four weeks of the survey, we concentrated outreach in counties where response counts remained below the target thresholds.

Of the approximately 7,500 invited administrators, 1,404 initiated the survey (19%), and 909 completed all core items, yielding an overall completion rate of 12%. The median completion time was 21 minutes. Recorded completion times were highly right-skewed, with some observations likely reflecting respondents leaving the survey open for extended periods rather than actively completing it. For that reason, we report the median as the most informative measure of completion time. Table 1 below shows response rates by role and LEA type.

Table 1. Survey Response Rates by LEA Type and Administrator Type

	Population Count (Est.)	Share %	Base	Reserve	Base+Reserve =Target	Completes Count	Difference from Base
LEA Type							
Charter School	1,361	53%	141	36	177	93	-48
School District	950	37%	137	35	172	353	216
SELPA	135	5%	126	32	158	15	-111
COEs	53	2%	81	21	102	39	-42
TOTAL	**2,499**	**100%**	**485**	**124**	**609**	**503**	**3**
Administrator Role							
Superintendent	1,003	23%	274	70	344	211	-63
Chief Business Official	1,003	10%	272	68	340	92	-180
Deputy/Assoc/Asst Supt	1,386	17%	200	50	250	151	-49
Director	2,157	26%	271	68	339	235	-36
Manager	1,019	12%	199	50	249	111	-88
Administrator	413	5%	219	55	274	45	-174
Coordinator	367	4%	54	14	68	40	-14
Executive Assistant	221	3%	109	27	136	24	-85
TOTAL	**7,569**	**100%**	**1,469**	**375**	**1,864**	**909**	**-580**

The analytic sample of 909 respondents includes administrators from 503 distinct LEAs across California's 2,499 LEAs (20% of all LEAs). Among traditional LEAs (i.e., school districts), the sample includes 353 of California's 950 (33% of all traditional LEAs). Administrators in 39 of California's 58 counties (67% of counties) completed surveys. The median number of respondents per LEA was 2 (range: 1-12). County-level response targets were met or exceeded in 47 counties (see Appendix 2.3 for county-level detail).

To assess whether the sample is representative of California's education administrator workforce, we compared respondents to the statewide population benchmarks on administrator role, administrator type, functional area, and LEA type. These comparisons suggest that the sample captures substantial variation across the statewide administrator workforce but does not perfectly match the population: traditional school districts and county offices of education are overrepresented relative to charter schools, and some role and functional-area benchmarks are based on proxy estimates rather than direct statewide counts, as shown in Table 2. To adjust for observable differences in response patterns, we apply post-stratification weights aligned to the statewide distribution of role type, LEA type, and enrollment band in all statewide estimates reported below.

To assess whether the sample is representative of California LEAs characteristics, we compared respondents to the statewide population on key statistics. Table 3 shows that the sample mirrors statewide distributions across most characteristics, with some overrepresentation of school districts (72% vs. 37% statewide) and underrepresentation of charter schools (12% vs. 53% statewide).

Table 2. Survey Response Rate Sample Compared to Populations

	Unweighted						Public Data
	N	% Total	Mean	SD	Min	Max	Mean
Administrator Role							
Superintendent	211	23%	93%	2%	30%	100%	1,003
Chief Business Official	92	10%	93%	9%	70%	100%	1,003
Deputy/Assoc/Asst Supt	151	17%	89%	3%	20%	100%	1,386
Director	235	26%	93%	5%	20%	100%	2,157
Manager	111	12%	91%	5%	50%	100%	1,019
Administrator	45	5%	91%	7%	50%	100%	413
Coordinator	40	4%	92%	4%	50%	100%	367
Executive Assistant	24	3%	90%	10%	10%	100%	221
Administrator Type							
Administrator	734	81%	92%	5%	20%	100%	7,569
Administrative Support Staff	175	19%	91%	5%	50%	100%	23,049
Functional Area							
Superintendent (EA here)	235	26%	92%	2%	30%	100%	1,948
Fiscal / Operations	355	39%	89%	5%	20%	100%	2,943
Curriculum & Instruction	117	13%	93%	5%	30%	100%	1,003
Human Resources	59	6%	93%	6%	20%	100%	489
Special Education	105	12%	95%	1%	70%	100%	870
State & Federal Programs	38	4%	92%	4%	50%	100%	316
LEA Type							
School District	650	72%	91%	12%	20%	100%	950
Charter School	111	12%	94%	11%	20%	100%	1,361
County Office of Education	125	14%	93%	11%	40%	100%	53
SELPA	20	2%	96%	8%	70%	100%	135
ROP	3	0%	90%	17%	70%	100%	49

Sources: Author's calculations for the sample. NCES Common Core of Data for administrator type. California Department of Education public school and directory files for LEA Type.
Methods note: Public data means for Role and Functional Area are proxy estimates rather than direct enumerations. Superintendent and chief business official counts are anchored to one district/county-office leader per entity, and residual role counts are allocated from the statewide administrator total (7,569) using the sample distribution.
Functional-area counts: Calibrated to the same statewide administrator total, with a floor of one curriculum/instruction lead per district and county office. See the Model and Sources sheets for assumptions and URLs.

Table 3. Describing Local Education Agencies (LEAs) in the Sample

	Sample Size		*Statewide*	
	N	**Mean**	**N**	**Mean**
Student Demographics				
Enrollment	3,463,721	6,872	5,812,312	1,200
Unduplicated Pupil Count	1,817,209	4,597	3,369,265	523
	N	**% of Total**	**N**	**% of Total**
Locale				
City	148	29%	728	36%
Suburb	147	29%	605	30%
Town	71	14%	212	10%
Rural	138	27%	478	24%
Enrollment Band				
< 500	128	25%	1229	48%
500 - 1,000	66	13%	405	16%
1,001 - 2,500	89	18%	344	13%
2,501 - 5,000	75	15%	230	9%
5,001 - 10,000	61	12%	164	6%
10,001+	85	17%	177	7%
Differentiated Assistance Status				
General Assistance	212	42%	1,477	71%
Differentiated Assistance, Year 1	211	42%	609	29%
Differentiated Assistance, Year 2	61	12%	n/a	n/a
No Assignment	20	4%	464	22%
Number of LEAs	503			
Number of observations	909			
Number of respondents per LEA	1, 12			

Notes: UPC percentage excludes charter schools, SELPAs, and ROPs for which data are not collected. The local population excludes 528 LEAs that did not have a local designation. These included some charter schools, SELPAs, and ROPs. Sample counts for differentiated assistance status included 20 'no assignment' made up of 15 SELPAs, 3 ROPs, and 2 charter schools. Differentiated assistance, Year 1, includes 12 charter schools coded as such in the source file. A very small number of ROP respondents appear in descriptive tables; because of their limited count, ROPs were not treated as a primary sampling stratum and were combined with SELPA/ROP categories where appropriate.

To formally assess differential response, we estimated a logistic regression model predicting response status using LEA-level characteristics available for both respondents and nonrespondents: log enrollment, locale, LEA type, unduplicated pupil count (UPC) percentage, and differentiated assistance (DA) status. Results indicate that response probability was significantly higher for traditional LEA and COEs, LEAs in urban and rural settings, and the roles of Superintendent and chief business officials.

To adjust for differential response and align the sample with the statewide administrator population, we constructed post-stratification weights that match the population distribution by role type, LEA type, and enrollment band. We applied these weights to all statewide estimates reported in the paper unless otherwise noted. Sensitivity analyses comparing weighted and unweighted results yielded substantively similar conclusions. See Appendix 6.1 for detailed results.

Measurement

Compliance time outcomes

Administrators reported two compliance time-related measures. First, they estimated the total number of hours per week typically devoted to compliance activities over the prior school year (2024-25). The survey prompt asked: "Think back over the past school year about the activities and tasks that you were engaged in. What amount of time (in hours) per week would you estimate in total that you spent on compliance activities?" Respondents entered a numeric value capped at their reported total work hours. This open-ended response serves as our primary measure of the total compliance time per week.

Second, for respondents who reported nonzero compliance time, we administered an activity-level time-allocation grid, asking them to distribute their total compliance hours across 19 specific compliance categories. Categories included special education requirements, LCAP development, budget and finance reporting, audits, staffing and HR compliance, supplemental student support programs, and other state- and federal-mandated plans and reporting processes. See Appendix 2.4 for a complete list. The grid was pre-populated with the respondent's total compliance hours and required allocations to sum to that total. Each category included brief examples to clarify scope (e.g.,

"Special Education: Data entry, IDEA reporting, IEP processes, out-of-home care"). Full category definitions and examples are provided in Appendix 2.3. This procedure yields person × activity observations (up to 19 per respondent) with weekly hours per activity as the outcome.

Value and burden ratings

For each compliance activity on which a respondent reported spending time, we measured two dimensions on a 7-point scale (0 to 6). First, we measured perceived value. "In your context, [Activity] is..." with endpoints labeled 0="Not at all valuable" and 6="Extremely valuable." The survey prompt defined value as the extent to which the activity "contributes to equity, accountability, continuous improvement, or local control." This statement is directly aligned with the primary principles of the Local Control Funding Formula (LCFF). (Baumgardner et al., 2018) Second, we measured perceived burden. "In your context, [Activity] is..." with endpoints labeled 0="Not at all burdensome" and 6="Extremely burdensome." The survey prompt defined burden as the extent to which the activity "creates administrative costs, distracts from core priorities, or feels duplicative." These definitions were constructed from prior evidence on what constitutes burden and were tested in a pilot survey with California education administrators (Willis, 2025).

We computed a net value-burden score by subtracting Burden from Value. This metric ranges from -6 (maximum burden, minimum value) to +6 (maximum value, minimum burden), where negative values indicate burden exceeds perceived value.

Governance benefit and compliance friction indices

To clarify the underlying dimensions of value and burden, we included eight Likert-type items (1=Strongly disagree to 6=Strongly agree) for each activity on which respondents spent compliance time. Each statement began with the name of the activity. Four items captured governance benefits:

- C1: “ensures higher degrees of equity by raising awareness of different student needs."
- C2: "holds staff accountable for outcomes in ways that improve practice and resource use."
- C3: "supports continuous improvement by generating actionable data for adjusting practice."

- C4: "preserves local control, allowing context-specific decision-making by administrators and the community."

Four items captured compliance friction:

- C5: "is duplicative of other tasks, making it redundant and inefficient."
- C6: "distracts from student-focused priorities, diminishing time available to focus on students."
- C7: "decreases engagement with community and staff, distracting from relationship-building."
- C8: "reduces time for better resource choices by limiting time to plan and implement with quality."

We constructed composite indices by calculating the proportion of items (out of 4) on which the respondent selected "Somewhat agree," "Agree," or "Strongly agree." This approach emphasizes interpretability by capturing the share of governance- or friction-oriented statements that respondents agreed with. Thus, the governance index ranges from 0 (disagreed with all four items) to 1 (agreed with all four), as does the friction index. We computed a net governance-friction score as the Governance index minus the Friction index, with values ranging from -1 to +1.

Factor structure and reliability

To validate the distinction between governance benefits and compliance friction, we conducted exploratory factor analysis (EFA) on a random 50% sample of person-by-activity observations and confirmatory factor analysis (CFA) on the holdout sample. EFA using oblique rotation (oblimin) supported a two-factor structure: Items C1-C4 loaded strongly on Factor 1 (governance; loadings ranging from 0.72 to 0.84) with minimal cross-loadings, and items C5-C8 loaded strongly on Factor 2 (friction; loadings ranging from 0.69 to 0.81). The two factors were correlated at $r = -0.68$, indicating a substantial negative association but empirical separability.

CFA fit indices supported the two-factor model: $\chi^2(19) = 85.4$, $p < 0.001$; CFI = 0.991; TLI = 0.987; RMSEA = 0.048; SRMR = 0.019. Internal consistency was acceptable for both scales: governance $\alpha = 0.86$; friction $\alpha = 0.84$. These results indicate that governance benefits and compliance friction can be reliably measured as separable dimensions. Full factor loadings and model fit details are reported in Appendix 5.2.

Additional measures

We also measured burden drivers by asking respondents to select (multi-select format) which factors most contribute to compliance burden across the activities they work on. Options included: duplication across multiple plans or processes, prescriptive processes that limit local choice, added requirements without removing older ones, requirements tightened in response to isolated instances of non-compliance, educational partner engagement requirements exceeding local capacity, data elements not used for decisions, timing misaligned with budgeting or planning cycles, technology or data system limitations, and other (with open-ended specification). This yields binary indicators for each burden driver.

From survey responses and linked California Department of Education administrative data, we constructed organizational and respondent control variables including: administrator role (Superintendent, Assistant Superintendent, CBO, director, COE administrator, other); LEA type (district, charter, COE, SELPA/ROP); total enrollment ($\log_2$-transformed for modeling); geographic locale (city, suburb, town, rural); unduplicated pupil count (UPC) percentage; differentiated assistance (DA) status; contracted weekly hours; typical weekly hours worked; and overwork hours (typical minus contracted). Missing UPC values (8.3% of LEAs) were mean-imputed to preserve the full analytic sample, with a missing indicator included in regression models.

Analytical Strategy

We employ complementary analytic approaches to characterize compliance and its correlates.

Descriptive estimation

We first present descriptive statistics on total compliance time, its distribution across activities and administrator roles, and variation by LEA size, type, and geographic location. For continuous outcomes such as weekly hours, we report means, medians, interquartile ranges, and 95% confidence intervals. For activity-level time allocation, we present the mean hours per activity among those reporting any time on that activity. All population-level estimates use post-stratification weights; we report both

weighted and unweighted estimates in Appendix 6.1 to assess the sensitivity of the results to weighting.

To compare compliance time with contracted hours, we use paired t-tests, supplemented by nonparametric Wilcoxon signed-rank tests and signed tests as robustness checks. To assess whether compliance burden varies by subgroup (role, LEA type, enrollment band), we use analysis of variance (ANOVA) or Kruskal-Wallis tests as appropriate. We adjust p-values for multiple comparisons using the Benjamini-Hochberg false discovery rate (FDR) procedure.

Net value-burden and governance/friction analysis

For each compliance activity with a sufficient sample size ($n \geq 30$), we compute the mean net value-burden score (value minus burden) and test whether it differs significantly from zero using paired t-tests, Wilcoxon signed-rank tests, and signed-rank tests. We adjust p-values using FDR and report effect sizes (Cohen's d). We also examine within-activity correlations between value and burden ratings using Spearman's ρ.

To examine variation in perceptions of governance and friction by organizational context, we estimate activity-specific means of the governance and friction indices by LEA type and administrator role. We test for subgroup differences using Kruskal-Wallis tests (for three or more groups) or Mann-Whitney U tests (for two groups), with FDR correction for multiple testing. These analyses identify which compliance activities are experienced differently by types of administrators or organizations.

Multilevel modeling of time allocation

To understand how perceptions of value and burden relate to time investment, we estimate two-part (hurdle) hierarchical models predicting weekly hours per activity. The two-part structure addresses the semi-continuous nature of the outcome: many person-by-activity observations have zero hours (respondent did not work on that activity), while positive values are right-skewed and approximately log-normally distributed.

Part 1 (Hurdle component)

We estimate a logistic mixed-effects model predicting whether the respondent allocated any time to a given activity, as a function of value and burden ratings, activity type, respondent characteristics, and LEA context. The analytic dataset contains 2,990 person-by-activity observations from 551 respondents (≈5.4 activities per respondent, on average). This model includes random intercepts for respondents to account for individual differences in compliance engagement.

Part 2 (Conditional hours component)

Among observations with positive hours, we model log(hours) using a linear mixed-effects model. Predictors include value and burden ratings (treated as ordered categorical variables using monotonic effects parameterization to respect their ordinal nature without assuming equal intervals), activity indicators (to control for baseline differences across compliance domains), respondent's total compliance hours (to control for overall workload), and organizational covariates (administrator role, LEA type, enrollment, locale, UPC percentage, DA status, overwork hours). We include data-quality indicators, e.g., mean-imputed UPC% plus a missing indicator, and a Los Angeles USD flag. The LAUSD flag was included to account for the size and scale of a single LEA and assess its impact on the model. This model includes random intercepts for both respondents and LEAs to account for clustering, though the LEA-level variance component is small given that 72% of LEAs contribute only one respondent.

We estimate the models using maximum likelihood; for linear mixed models, we use restricted maximum likelihood (REML). The monotonic effects approach for Likert predictors estimates separate threshold parameters for each level (≥1, ≥2, ..., ≥6), allowing the effect of moving from "agree" to "strongly agree" to differ from the effect of moving from "disagree" to "somewhat disagree" (Bürkner & Charpentier, 2020). This approach respects the ordinal nature of the scales without imposing equal-interval assumptions.

Moderation by organizational constraints

We examine whether the relationship between perceived value and compliance time allocation varies across organizational contexts with differing administrative capacity. We construct an index of

structural constraints that combines small LEA size (enrollment < 1,000), a high UPC percentage (> 60%), and differentiated assistance status. We then estimate interaction models that allow the association between perceived value and time spent on an activity to differ between higher- and lower-constraint settings. The analysis assesses whether administrators in more resource-constrained organizations can allocate time to activities they perceive as valuable to the same extent as administrators in less constrained contexts.

Governance and friction as predictors of net value-burden

Finally, we estimate hierarchical linear models predicting the net value-burden score from the governance and friction composites, controlling for activity type, role, and LEA context, and including random intercepts for respondents and LEAs. We standardize (z-scores) governance and friction indices to facilitate interpretation. This analysis assesses the extent to which the underlying governance benefits and compliance friction explain variation in overall value-burden ratings.

Detailed methodological specifications, statistical tests, and robustness checks are provided in Appendices 5 and 6.

Findings: The Magnitude, Distribution, and Perceived Value of Compliance Burden

This section presents descriptive and model-based evidence addressing the study's core research questions. We present five core findings from the California Education Administrator Compliance Survey (N=909). These findings establish: (1) the magnitude of time and estimated cost devoted to compliance; (2) which activities consume that time; (3) how administrators assess the value versus burden of compliance work; (4) how compliance time and perceptions vary across organizational contexts and roles; and (5) which factors administrators identify as primary drivers of burden. Together, these findings document the scale of compliance burden and its uneven distribution of perceived value across activities.

Education administrators devote substantial time and resources to compliance and report strong rule-following orientations

1. Education Administrators Devote Approximately 20 Hours Per Week to Compliance Activities

California education administrators in the sample report working substantially more hours than their contracted schedules. Average contracted hours are 40.3 per week, while average self-reported hours worked are 51.4 per week. Respondents also report substantial time devoted to compliance activities: average reported compliance time is approximately 19 to 20 hours per week during the 2024–25 school year. Relative to typical work hours, this corresponds to roughly 39 percent of the workweek, or about two full workdays per week. Applying post-stratification weights to California's approximately 7,569 LEA administrators, we estimate that administrators statewide devote about 151,000 hours per week to compliance activities, equivalent to approximately 3,775 full-time positions, assuming a 40-hour workweek. These estimates provide evidence that compliance activities constitute a substantial component of administrators' work. See Table 4 for additional descriptive statistics.

Table 4. Descriptive Statistics: Contracted, Work, and Compliance Hours

	N	Mean	Std Dev	Variance	90th %ile	10th %ile	Missing Percent
Individual Respondent Metrics							
Contracted Hours Per Week	909	40.3	6.9	48.3	45	40	0
Work Hours Per Week	909	51.4	8.8	78.0	60	40	0
Compliance Hours Per Week (2024-25)	909	18.9	13.4	178.5	35	5	0

Sensitivity Analysis of Self-Reported Hours

Because time-use estimates are self-reported, they should be interpreted as approximate reported workload rather than precise time-accounting measures. We conduct sensitivity analyses applying plausible downward adjustments to both total worked hours and reported compliance hours. Specifically, we consider scenarios ranging from modest (10%) to more conservative (25%) reductions,

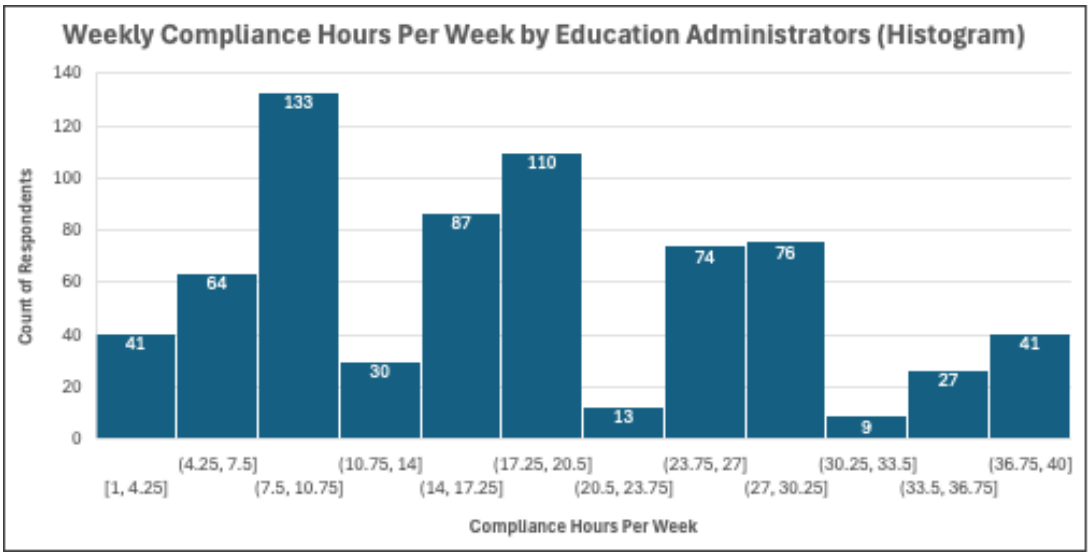
consistent with prior evidence on time-reporting error. Across these adjustment assumptions, the estimated compliance share remains substantial. Full assumptions and calculations are reported in Appendix 4.4.

2. Education Administrators Vary in Compliance Time, But Average Time is Consistent Across Roles

Variation in Compliance Time

Compliance time varies substantially across administrators. Approximately 25% report spending 24 or more hours per week on compliance, while the lower quartile spends less than 12 hours per week. Figure 1 shows that the distribution is visibly heaped at round-number values such as 10, 20, and 30 hours, suggesting that some respondents likely reported approximate rather than finely measured time estimates. Even with this heaping, the overall pattern indicates that compliance occupies a substantial share of administrator work time for many respondents.

Figure 1. Compliance Hours Per Week by Education Administrators (Histogram)



Consistency Across Roles

Average compliance time is relatively consistent across administrator roles (Superintendent, Assistant Superintendent, CBO, Director, COE Administrator), with means ranging from 18.7 to 21.4

hours per week. There was no statistically significant difference between roles (p=0.29). Specific compliance tasks may differ by role, but total compliance time is similar, suggesting that compliance demands are broadly distributed across multiple administrative positions. Table 5 provides further descriptive statistics by administrator role in the sample.

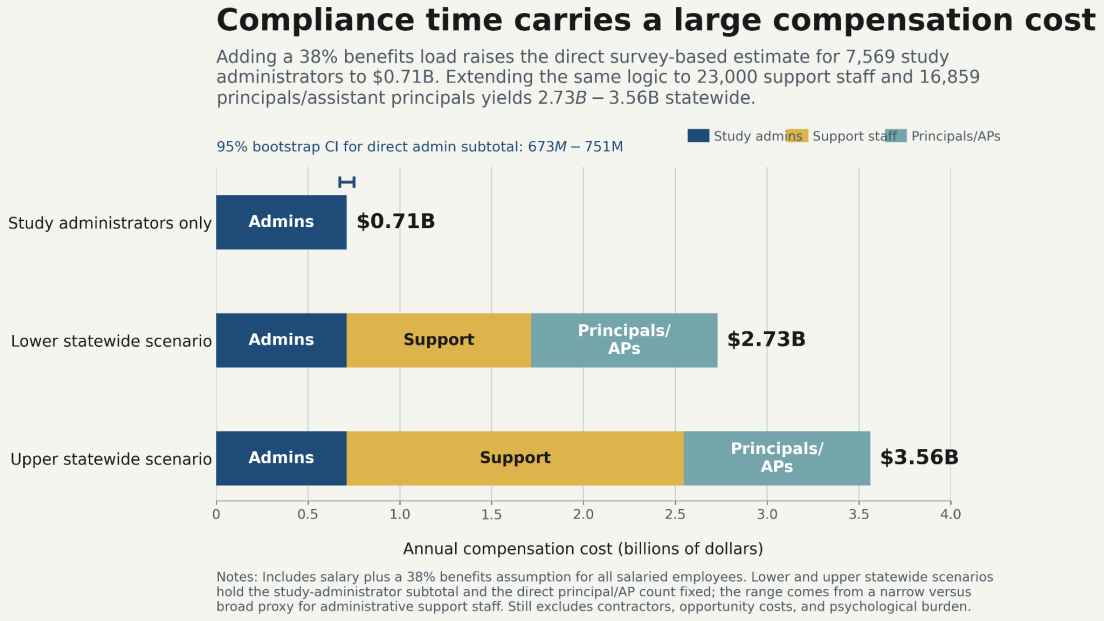
Table 5. Describing Education Administrators in the Sample: Contracted, Work, and Compliance Hours

	Supt	CBO	Deputy Supt	Direct-or	Manager	Admin-istrator	Coord-inator	Exec Asst
Individual Respondent Metrics								
Contracted Hours Per Week	41.4	39.6	40.9	40.3	39.8	40.2	39.1	40.0
Work Hours Per Week	55.9	51.8	55.0	50.5	47.6	48.5	42.6	44.7
Compliance Hours Per Week (FY25)	17.1	19.8	20.6	20.6	22.5	23.2	25.9	18.0

3. The total cost of compliance for California public schools is substantial

To estimate the annual compensation cost of compliance time, we calculate respondent-level compliance cost as annual salary multiplied by 1.38 to account for benefits and then multiplied by the share of the respondent's typical work time devoted to compliance, capped at 100 percent. Using complete-case responses on annual compliance hours and scaling to the study population of 7,569 California education administrators, we estimate that compliance time carries an annual compensation cost of approximately $712 million (95% bootstrap CI: $673 million to $751 million), or about $94,005 per administrator (see Figure 2).

Figure 2. Compliance Time Carries a Large Compensation Cost



Extending the same logic to an estimated 23,000 administrative support staff and to a direct benchmark of 16,859 California principals and assistant principals yields a statewide total compensation cost between $2.73 billion and $3.56 billion annually. The lower bound uses a narrow support-staff proxy based on executive assistant and board clerk respondents, while the upper bound uses a broader proxy based on manager, coordinator, and executive assistant respondents. These broader estimates include salary and benefits but exclude contracted services, indirect labor outside the included groups, opportunity costs, and psychological costs. Appendix 6.4 provides detailed methodology for these cost estimates.

4. Education administrators' approach to rules and regulations in public education

To understand how administrators approach compliance requirements, we asked respondents to select the statement that best described their orientation toward rules and regulations in public education. Detailed item development and conceptual background are provided in Appendix 4.5.

Results indicate a strong rule-following orientation. Eighty-nine percent of administrators selected one of three compliance-oriented approaches: flexible application (40 percent), innovation within

boundaries (28 percent), or strict compliance (21 percent). The remaining 11 percent selected approaches suggesting more active rule questioning or reinterpretation, including pragmatic balance (8 percent), rule challenger (2 percent), or rules as guidelines (1 percent).

Administrators report high compliance orientation across roles and LEA contexts. Differences by position are small and not statistically different from zero (Cramér's V = 0.02). This pattern suggests that compliance obligations are widely treated as a professional norm and that most administrators operate within, rather than against, established regulatory expectations.

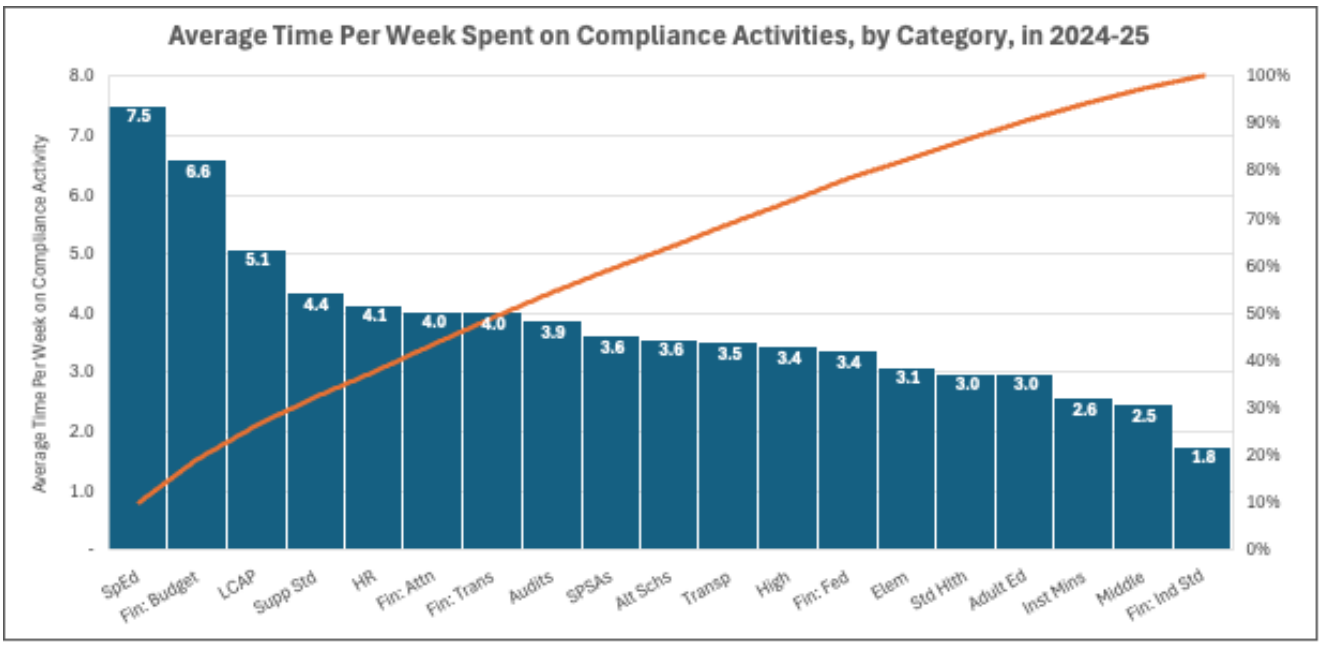
5. Five Activities Dominate Compliance Time

Compliance time is not distributed evenly across activity areas. Five activity categories account for 42 percent of total reported compliance time: special education, finance and budget reporting, the LCAP, student support programs, and human resources compliance. These domains represent the principal areas in which administrators report sustained compliance workload.

Among administrators who report time in these categories, average weekly time is 7.5 hours for special education, 6.6 hours for finance and budget reporting, 5.1 hours for LCAP-related work, 4.4 hours for student support programs such as ELOP and community schools, and 4.1 hours for human resources compliance. Together, these five categories average 27.7 hours per week among administrators who work on them, although not all administrators are responsible for all five. The population-weighted average across all respondents is lower, at about 20 hours per week, but for those directly responsible for these domains, the associated compliance workload is substantial.

Beyond these top five domains, administrators also report time on a wider range of additional compliance activities, including public records requests, alternative schools reporting, and SPSA/SARC/Williams requirements. Although each of these categories consumes less time individually, they accumulate over the work of administrators who typically report on multiple compliance areas. As shown in Figure 3, the median administrator reports working across six to eight distinct compliance categories, requiring familiarity with multiple systems, timelines, and reporting requirements.

Figure 3. Average Time Per Week on Compliance Categories, by Category, in 2024-25



One administrator described this pattern clearly: “While I believe compliance docs like the LCAP can be used as a roadmap, it requires an inordinate amount of time to prepare and takes away valuable time with other, more important opportunities. During the months of May-June, I cannot visit schools as often as I would like or meet with people/groups because of the burdensome process, meetings, revisions, etc.”

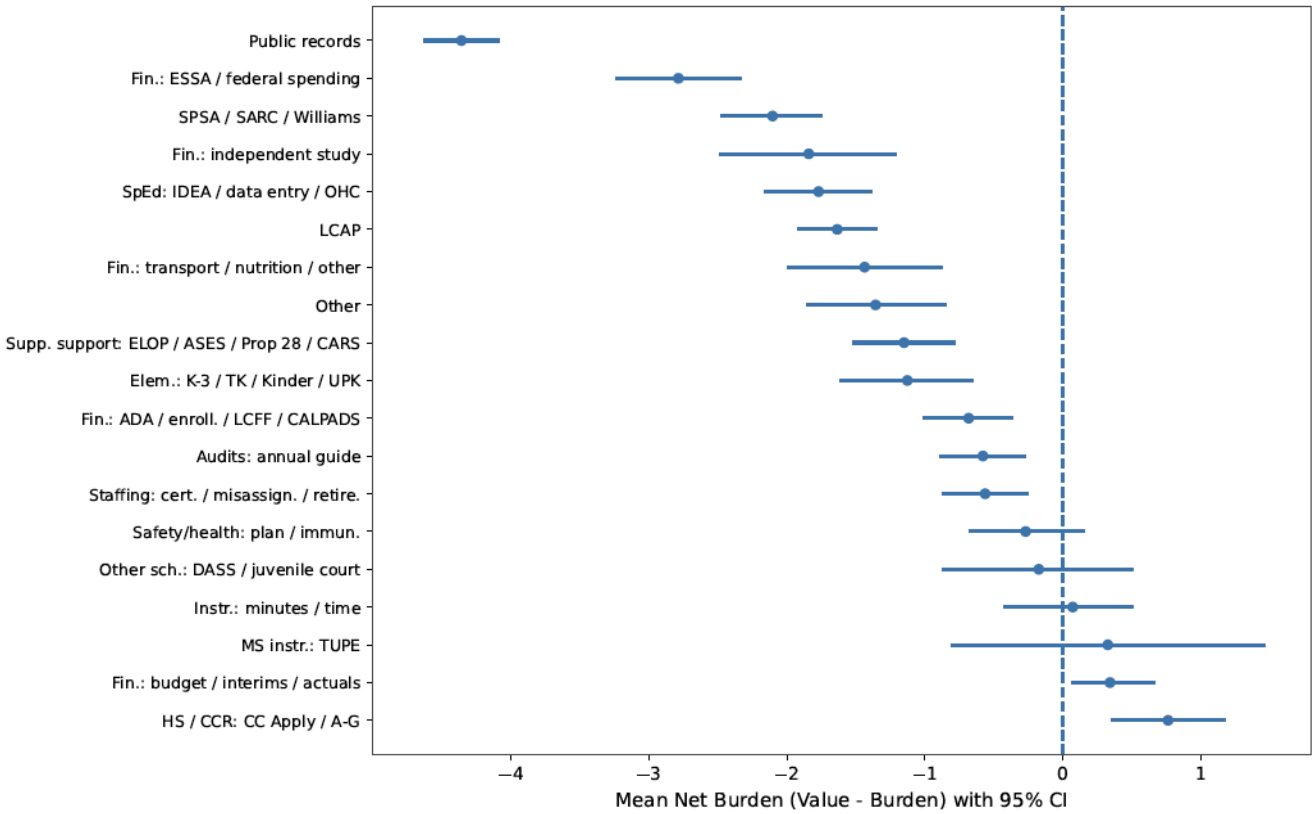
Finding: Administrators Rate Most Compliance Activities as More Burdensome Than Valuable

For each compliance activity administrators reported working on, they rated both its *value* and its *burden* on a 0-6 Likert scale. Value captures perceived contributions to equity, accountability, continuous improvement, and local control. Burden captures perceived duplication, distraction from student-focused priorities, and reduced planning time. We compute a "net value-burden score" as value minus burden, with negative values indicating that burden exceeds perceived value.

1. Most activities have a negative net value-burden

Across the 19 compliance activities with sufficient sample sizes (n≥30), most were, on average, rated as more burdensome than valuable. Fifteen activities had mean net value-burden scores below zero, indicating that burden exceeded perceived value. These negative mean scores remain statistically significant after adjusting for multiple comparisons using the Benjamini-Hochberg False Discovery Rate procedure (see Appendix 6.5 for full statistical tests). Figure 4 summarizes net value-burden ratings across activities.

Figure 4. Mean Net Burden by Compliance Activity



The three activities with the most negative net value-burden scores were public records requests ($M = -4.37$, $p < 0.001$), federal finance reporting under ESSA per-pupil spending requirements ($M = -2.79$, $p < 0.001$), and SPSA/SARC/Williams compliance ($M = -2.12$, $p < 0.001$).

Only one activity had a significantly positive net value-burden: High School Instruction/College & Career Readiness (A-G alignment, FAFSA support, CTE grants), with $M = +0.76$ ($p < 0.001$). On average, administrators rated this activity as more valuable than burdensome.

Across all activities, value and burden ratings were inversely related (median Spearman's $\rho = -0.38$), indicating that activities viewed as more burdensome were generally viewed as less valuable. In particular, activities experienced as more duplicative or more distracting from student-focused priorities tended to receive lower value ratings.

Overall, these patterns suggest that administrators distinguish between compliance activities that are experienced as supporting governance goals and those experienced primarily as administrative obligations. Some activities are viewed as valuable despite requiring substantial effort, while others, particularly those associated with duplicative reporting or limited perceived governance benefit, are rated as highly burdensome.

2. Administrators Allocate More Time in Activities They Rate as Valuable

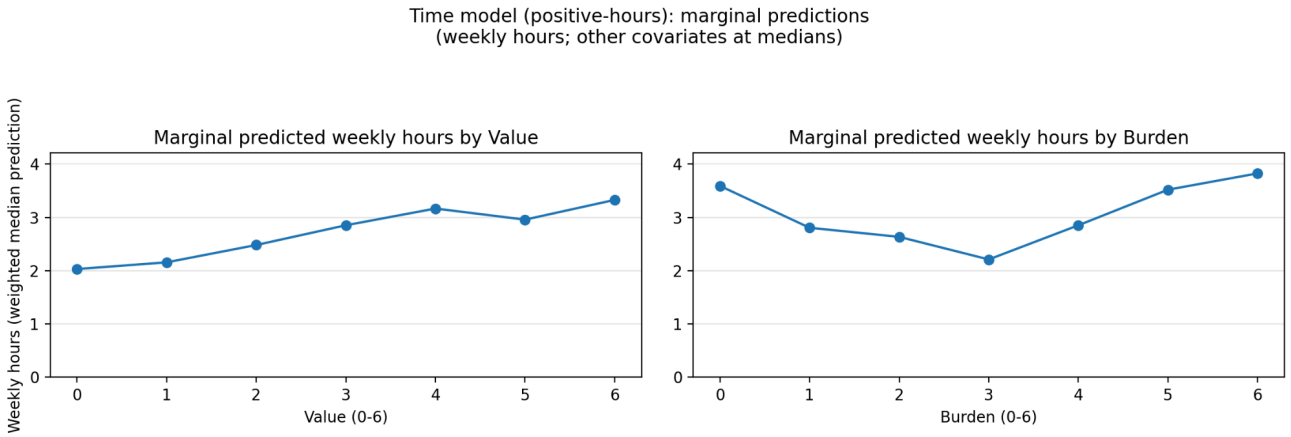
Administrators allocate more time to compliance activities they rate as more valuable, even after accounting for differences across activities and overall workload. To examine this relationship, we estimate a two-part hierarchical model predicting weekly hours per activity from value and burden ratings, with random intercepts for respondents and LEAs (see Appendix 5.3 for full specifications). Value ratings were modeled as ordered categories, allowing differences between adjacent levels to vary rather than imposing a strictly linear relationship.

Across activities, moving from the lowest value rating (0) to the highest (6) is associated with approximately 1.3 additional hours per week allocated to that activity ($p < 0.001$), holding burden constant. This corresponds to roughly a 57 percent increase over the baseline predicted time investment. These results suggest that administrators devote substantially more effort to compliance activities they rate as more valuable, even after controlling for differences in burden and activity.

Once perceived value is included in the model, burden shows a weaker and non-linear association with time allocation. Predicted hours dip at moderate burden levels and rise again at the

extremes, producing a U-shaped pattern. This pattern likely reflects that some activities require substantial time regardless of perceived burden, rather than suggesting that higher burden directly increases effort. Figure 5 illustrates the predicted hours by perceived value and perceived burden on a 0-6 rating scale.

Figure 5: Predicted hours by value and burden (same y-axis)



We also examined whether organizational constraints moderate the relationship between value and time allocation. Under conditions of greater constraint—such as smaller LEAs, limited staffing capacity, or differentiated assistance status—the association between perceived value and time is weaker, suggesting that administrative capacity may shape the extent to which preferences translate into time investment.

Finding: A Framework for Understanding Compliance: Governance Benefits Versus Compliance Friction

We next examine how administrators differentiate among compliance activities in terms of *governance benefits* and *compliance friction*. These dimensions are related to, but distinct from, the broader value and burden measures reported earlier. Value and burden capture administrators' overall assessments of an activity, whereas governance benefits and compliance friction capture more specific features of how that activity is experienced. Across activities, value and burden ratings are inversely related (average within-activity Spearman's $\rho \approx -0.38$), indicating that activities perceived as more burdensome are also viewed as less valuable. The governance/friction framework helps clarify why

some activities are seen as governance-supporting even though they are also experienced as administratively costly.

To examine these dimensions more directly, we asked administrators to rate each activity on eight items spanning two conceptual domains. The first captures governance benefits: whether the activity raises awareness of different student needs, holds staff accountable in ways that improve practice, supports continuous improvement through actionable data, and preserves local control and context-specific decision-making. The second captures compliance friction: whether the activity is duplicative, distracts from student-focused priorities, decreases community and staff engagement, and reduces time for better planning and resource design. Factor analysis indicates that these items load onto two distinct but correlated dimensions (correlation = -0.68), supporting the empirical separability of governance benefits and compliance friction (Appendix 5.2). An activity may therefore be rated high on governance benefits and high on friction at the same time..

1. Different Administrator Roles Experience the Same Activities Differently

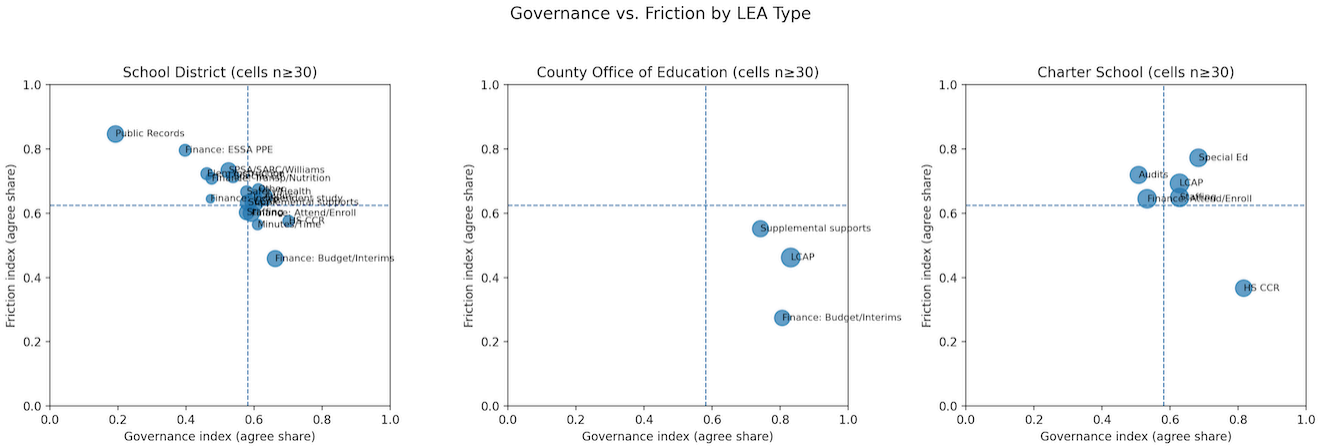
To examine how compliance activities are experienced across organizational contexts, we constructed governance and friction indices for each activity, defined as the share of respondents endorsing the four governance items and four friction items, respectively. We summarize these dimensions using a net governance measure (governance minus friction), ranging from −1 to +1. Positive values indicate that governance benefits exceed friction; negative values indicate the reverse.

We find substantial heterogeneity in how the same compliance activity is perceived across LEA types and administrator roles. Activities that appear relatively high-governance and low-friction for some respondents are rated as higher-friction and lower-governance benefit by others, indicating that implementation context and placement within the school system shape perceived experience.

Differences by LEA type are especially visible for county offices of education (COEs) relative to school districts. COEs rate several activities as having higher governance benefits and lower friction than school districts. For example, as shown in Figure 6, COEs place finance-related reporting (Budget/Interims) closer to the high-governance/low-friction quadrant, while districts rate the same

activity as involving greater friction, and therefore a different quadrant. Similar patterns emerge for LCAP development and audit processes, which COEs more often describe as supporting accountability, whereas districts more frequently experience them as administratively burdensome. These differences are consistent with the variation in fiscal roles across LEA types.

Figure 6. Governance versus Friction Index Quadrants by LEA Type (cells with n>=30)



Differences across administrator roles are also pronounced. Many activities show large and statistically significant differences in net governance across roles after controlling for multiple comparisons (FDR-adjusted $p < 0.05$). Activities with the strongest evidence of role-based divergence include audits, LCAP, Finance: Attendance/Enrollment, SPSA/SARC/Williams, supplemental supports, staffing, and Finance: Budget/Interims.

The scatter plot in Figure 7 highlights especially sharp contrasts between superintendents and Chief Business Officials (CBOs). For instance, superintendents rate Finance: Attendance/Enrollment in the high-friction/low-governance quadrant, whereas CBOs rate the same activity closer to the low-friction/high-governance quadrant. Similar role-based patterns emerge for LCAP and Budget/Interims reporting. These differences indicate that the same compliance activity is experienced differently across administrator roles and organizational contexts. This may also have implications for how education administrators approach challenges and solutions in the same activity.

To further connect governance and friction perceptions to administrators' broader value and burden ratings, we compute the mean net governance-friction score (governance benefit minus

compliance friction) for each activity and compare it with the mean net value-burden score (value minus burden). Figure 8 plots activities in this two-dimensional space.

Figure 7. Governance versus Friction Index Quadrants by Role Type (cells with n>=30)

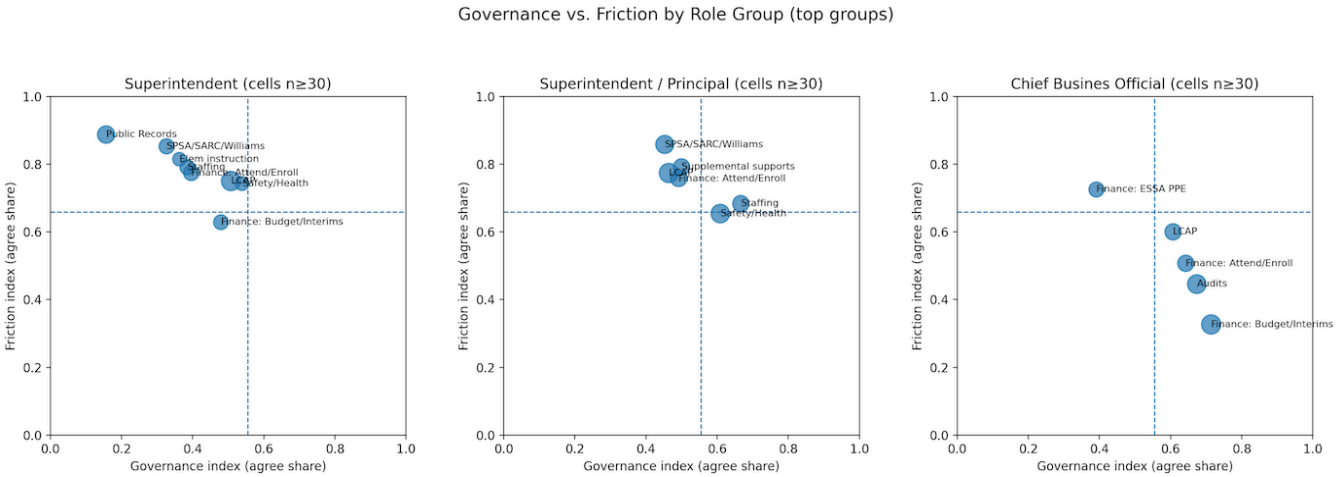
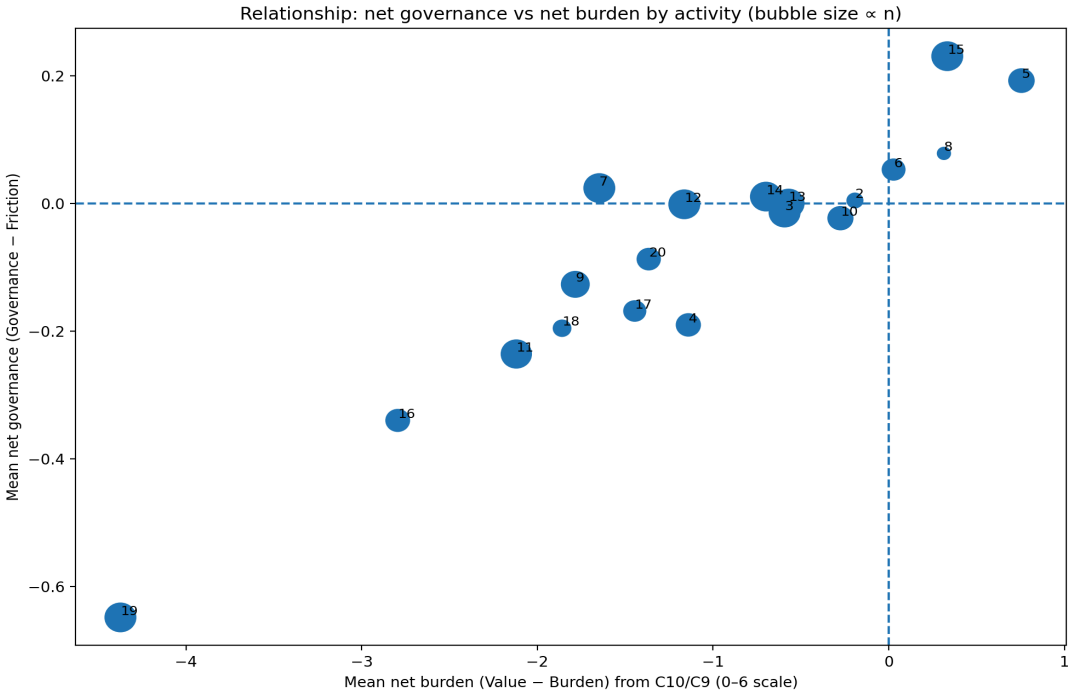


Figure 8. Relationship between Net Governance versus Net Value-Burden by Activity (bubble size = n)



Only a small number of compliance activities fall in the upper-right quadrant, indicating both higher governance benefit than friction and higher value than burden. These include High School Instruction, Finance: Independent Study, Middle School Instruction, and Instructional Minutes/Time. For most activities, respondents report either mixed experiences or net-negative value-burden scores, even when governance benefits are rated positively. For example, administrators rate the LCAP as governance-supporting on average, but it still receives a negative mean net value-burden score (≈ −1.86), indicating that the burden of completing the LCAP exceeds specific governance-supporting benefits such as equity, education partner engagement, and continuous improvement.

These findings indicate that compliance activities are not experienced uniformly across roles or organizational settings. Instead, perceptions of governance benefit and friction vary systematically depending on who is responsible for the work and how the activity is implemented in an organizational context. This may also suggest a lack of alignment among education administrators within an LEA regarding what provides governance benefits.

2. Governance Benefits and Compliance Friction are Strongly Associated with Net Value-Burden Score

To examine how governance benefits and compliance friction relate to overall value–burden assessments, we use hierarchical linear models, with the net value-burden score as the outcome and the governance and compliance-friction indices as predictors, controlling for LEA context, administrator role, and activity type (see Appendix 5.3 for full specifications). In these models, the composite of governance benefits and compliance friction accounts for substantially more variation in net value than the other included covariates.

Governance and friction composites show large, statistically significant associations with the net value-burden score. In the primary model, a 1 standard deviation (SD) increase in the governance composite is associated with a +0.95 increase in the net value-burden score ($p < 0.001$), whereas a 1 SD increase in the friction composite is associated with a −1.38 decrease in the net value-burden score ($p < 0.001$). Expressed in standardized units of net value-burden score, these correspond to approximately +0.33 SD (governance) and −0.48 SD (friction).

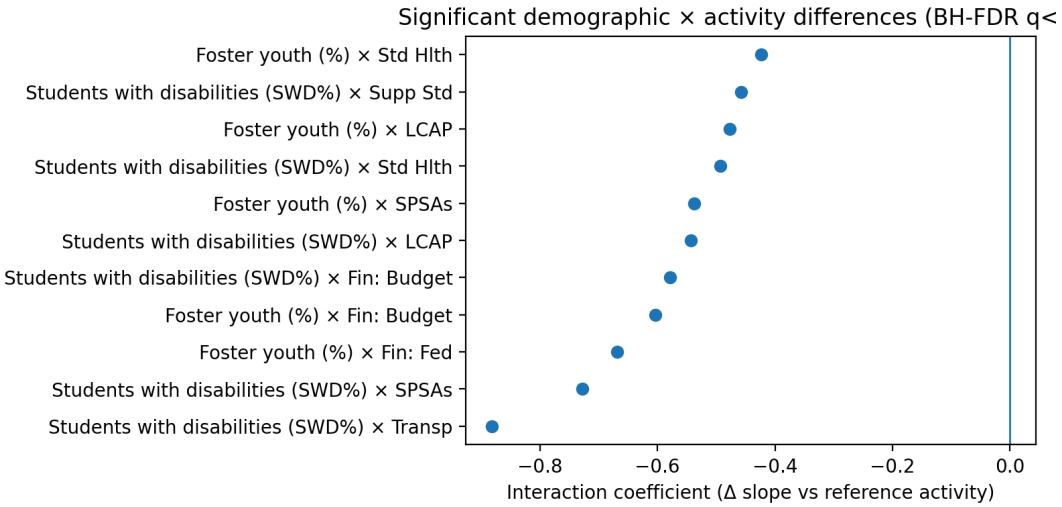
Item-level models show that the friction items most strongly associated with a negative net value-burden score are those indicating displacement of student-focused work and planning capacity. In particular, the largest coefficients are for “distracts from student priorities” (−0.58 per SD, $p < 0.001$) and “reduces time for planning/design” (−0.72 per SD, $p < 0.001$).

In related two-part time-allocation models predicting weekly hours per activity, both perceived burden and perceived value are positively associated with greater time spent on an activity, conditional on activity type and controls. Specifically, a +1 point increase in burden is associated with approximately +12.5% more weekly hours allocated to that activity ($p < 0.001$), and a +1 point increase in value is associated with approximately +9.4% more weekly hours ($p < 0.001$), net of activity differences and other controls. Together, these findings indicate that administrators allocate time both to activities they perceive as required (higher burden) and to activities they perceive as worthwhile (higher value), and that governance benefits and compliance friction can be distinguished empirically, with some activities rated high on both dimensions and others rated high on friction but low on governance benefits.

3. Certain Accountability, Capacity, and Demographic Characteristics Influence Time Spent on Compliance Activities

We also examined whether LEA accountability status, capacity, and student demographics moderate time spent on compliance activities. Most of these interactions are modest, but several patterns are notable. Greater spending per ADA attenuates the negative association between compliance friction and net value-burden, suggesting that fiscal capacity can buffer some of the adverse effects of friction. In addition, LEAs serving higher proportions of students eligible for free or reduced-price meals devote more time to supplemental student support compliance activities. Screening interactions between demographic characteristics and activity type also reveals several significant differences after adjustment for the false discovery rate, particularly for student support, LCAP, SPSA, and student health activities. Full results are reported in Figure 9.

Figure 9. Significant demographic and activity differences



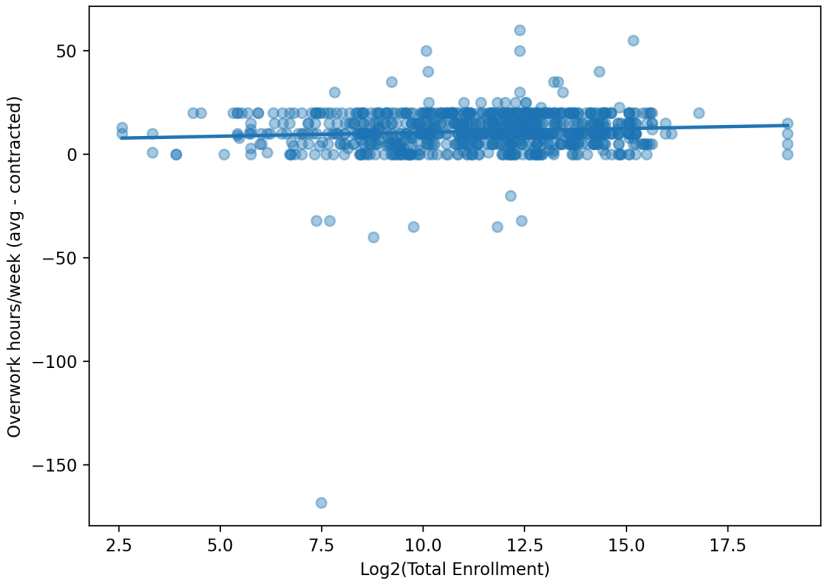
Finding: Compliance Time Does Not Vary by LEA Size, but Perceptions and Stress Do

Smaller LEAs are often assumed to face disproportionate compliance burden under California's accountability system, and prior policy reports and surveys have raised similar concerns (CSBA, 2024; Willis et al., 2022). Our results suggest a more specific pattern. Across analyses, LEA size is not strongly associated with the number of hours administrators report spending on compliance. Instead, enrollment is more consistently related to reported stress, differentiated assistance context, and compliance-related beliefs.

To examine these relationships, we conducted descriptive and regression-based analyses, including Spearman correlations, adjusted models with LEA-clustered standard errors where appropriate, and tests of enrollment effects within the hierarchical models. In models predicting net value-burden score while controlling for activity type and governance/friction composites, log2(enrollment) shows a small positive association with net value-burden score (coef = 0.06; p = 0.05). In parallel descriptive analyses, both weekly compliance hours and the percentage of work time devoted to compliance are approximately flat across enrollment levels.

By contrast, measures of overwork increase with enrollment, holding administrator role and LEA type constant. As shown in Figure 10, administrators in larger LEAs report working more total hours per week than their counterparts in smaller LEAs.

Figure 10. Overwork hours per week by log2(total enrollment) with regression



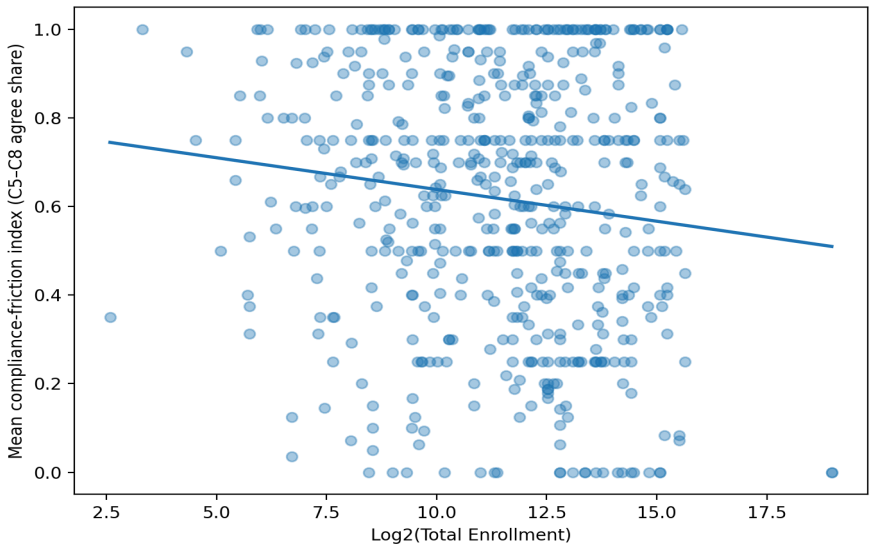
These results suggest that the small-LEA challenge may lie less in the absolute amount of compliance time than in how compliance is experienced organizationally. As one administrator explained, “As a small district with a single administrator responsible for the full LCAP cycle and numerous additional districtwide functions, the current volume of compliance requirements represents a significant lift that pulls time and capacity away from the instructional development and deep data analysis we need in order to move our district forward.”

1. Unpacking challenges related to stress and beliefs associated with smaller LEAs

Although compliance hours do not vary strongly by enrollment, smaller LEAs report somewhat more negative beliefs about the accountability system and slightly higher perceived compliance friction on several survey dimensions. For example, administrators in smaller-enrollment LEAs report more negative views of LCAP implementation than those in larger-enrollment LEAs (Spearman’s $\rho \approx$ 0.11–0.16, depending on the item).

Similarly, the compliance friction index, which includes perceptions such as duplication and distraction, is modestly higher among smaller-enrollment LEAs ($\rho \approx -0.10$), a pattern that also appears in adjusted regression models. The scatterplot in Figure 11 illustrates this relationship.

Figure 11. Mean compliance friction index by Log2(Total Enrollment)



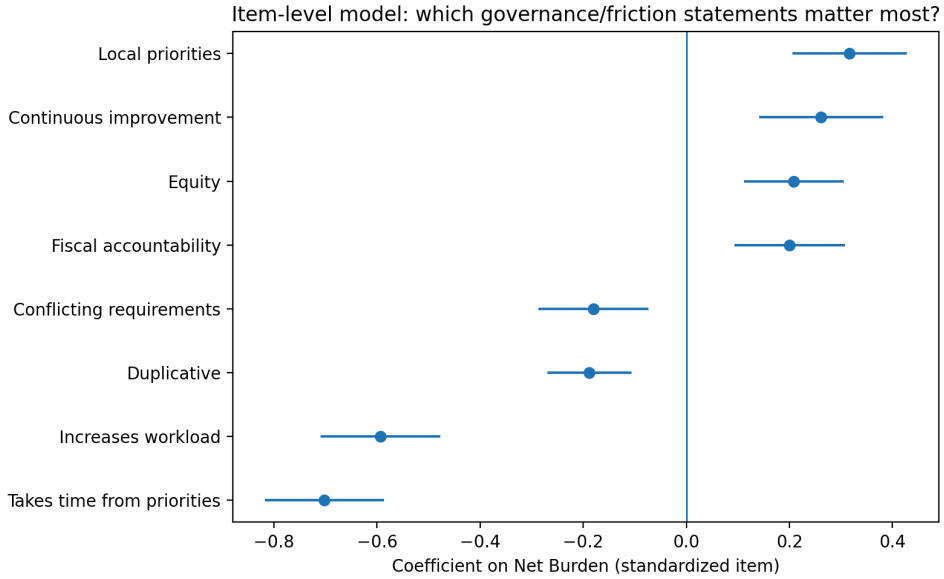
These differences are modest in magnitude but consistent in direction. They suggest that administrators in smaller LEAs may experience compliance activities as more frictional, even when total compliance hours are similar across enrollment levels. Qualitative responses point in the same direction. As one administrator explained, “There has to be change for small, rural districts. I work TWO jobs as a Superintendent and a principal... I am in classrooms, subbing, managing discipline, building community relationships, sitting in IEP’s, and prepping for Board meetings. My district office has FOUR people. It is insanity to have to write an SPSA when the LCAP covers that.”

These findings suggest that the challenge for smaller LEAs may lie less in the absolute amount of compliance time than in how that time is absorbed within the organization. In settings with thinner administrative capacity and less role specialization, similar compliance demands may be experienced as more disruptive and more difficult to integrate with other responsibilities. This interpretation is consistent with the observed pattern: reported compliance hours are relatively stable across enrollment levels, but compliance friction and negative perceptions are modestly higher in smaller LEAs.

Finding: Administrators Identify Accumulating Requirements and Duplication as the Primary Burden Drivers

To complement the descriptive results on reported burden drivers, we also estimated a separate item-level model examining which governance and friction statements were most strongly associated with administrators' overall burden assessments. Figure 12 presents those estimates.

Figure 12. Item-level model: Which governance/friction statements matter the most



To better understand what administrators perceive as driving compliance burden, the survey included an item asking respondents to select the main sources of burden (survey item C11). Selection rates differed significantly across burden drivers (Cochran's Q = 885.3, df = 8, $p < 1e{-}6$), indicating that administrators consistently prioritized certain factors over others.

The two most frequently selected burden drivers were added requirements without removal of older ones (82 percent) and duplication across multiple plans or processes (80 percent). A second tier of commonly selected drivers included prescriptive processes that limit local choice (54 percent) and timing misaligned with budgeting or planning cycles (54 percent).

One administrator summarized this dynamic, "We have returned to the days of so many restricted funds with specific allowable uses... Add to that the reporting requirements, which are often distributed AFTER the funds have been allocated/received/expended."

Administrators also provided open-ended suggestions to reduce the compliance burden. Responses emphasized maintaining core equity and accountability protections while reducing duplicative reporting and overlapping planning requirements. Table 6 below shows the most common themes.

Table 6. Most Common Themes in Administrators' Reports of Compliance Burden

Rank	Theme | Highlighted Quote	Count	% Responses
1	***One plan, one timeline, stop repeating the same data:*** Consolidate the multitude of reports by eliminating duplicative requirements ("one plan/report").	209	42%
2	***LCFF promised local control, but we are sliding back into categoricals.*** Reduce volume of restricted one-time funds; increase flexible, ongoing base funding	187	37%
3	***Fewer required metrics, keep disaggregation for equity pursuits.*** Focus accountability on outcomes that matter; reduce data hoarding by state agencies	121	24%
4	***Clearer public reporting builds public trust.*** Use plain language, infographics, and summaries; the public does not read and can not understand current documents.	104	21%

Overall, administrators most often attribute compliance burden to the accumulation of new requirements layered onto existing ones and the duplication of reporting across multiple planning and accountability processes.

Discussion and Implications

Summary of Key Findings and Contributions to the Literature

This study makes both an empirical and a conceptual contribution. Empirically, it provides the first systematic statewide documentation of compliance workload among California central-office education administrators. Administrators report spending approximately 20 hours per week on compliance activities, or about 39 percent of a typical workweek, and five domains account for 42 percent of reported compliance time: special education, fiscal and budget reporting, LCAP work, student support programs, and human resources compliance. Weighted to the statewide administrator population, this corresponds to approximately 151,000 administrator hours per week devoted to compliance activities. These findings establish compliance as a substantial and structured use of administrative capacity in California public education.

Conceptually, the study extends the administrative burden literature into a setting where it has received less attention: the experience of public professionals responsible for implementation. Prior scholarship on administrative burden has focused primarily on citizens and service recipients. This study shows that, in education, administrative burden is also experienced by the administrators responsible for translating policy requirements into organizational practice. In that sense, the paper shifts attention from whether bureaucracy imposes costs to how those costs are absorbed within public organizations.

Governance Benefits and Compliance Friction: A More Precise Framework for Interpreting Compliance Experience

The study also offers a more precise framework for interpreting compliance experience by distinguishing between governance benefits and compliance friction. This distinction matters because compliance is not experienced uniformly. Administrators do not simply reject compliance requirements; many view some activities as important for equity, accountability, fiscal stewardship, and continuous improvement. At the same time, some of these same activities are experienced as

administratively costly, time-intensive, or procedurally difficult. The LCAP is the clearest example: administrators often view it as governance-supporting, yet they still rate it negatively overall because the process surrounding it generates substantial friction. This finding suggests that the core policy issue is not whether compliance should exist, but how governance goals can be pursued through administrative forms that are less duplicative and more usable for local systems.

This distinction also helps explain why most activities are still experienced negatively. Across 19 measured compliance activities, 15 have negative net value-burden scores, with public records requests, federal finance reporting, and SPSA/SARC/Williams compliance among the most negatively rated. At the same time, administrators devote more time to activities they perceive as more valuable, and this relationship weakens under higher structural constraints. Together, these findings suggest that administrators' beliefs are linked to time allocation, but that organizational capacity shapes how strongly perceived value translates into effort.

These findings are consistent with the possibility that administrators allocate more effort toward activities they view as governance-supporting and relatively less toward activities they perceive as low value. Whether this pattern reflects efficient prioritization or creates gaps in activities that serve important public purposes remains an open empirical question. Because the present study is based on perception data, it cannot determine whether activities rated as low value in fact fail to serve their intended purposes.

Drivers of System Drag Come Into Clearer Focus

The findings also sharpen the view of system drag from a concept to practical, documented attitudes and behaviors that contribute to the phenomenon. First, the hours-weighted decomposition suggests that only about 42 percent of compliance time is experienced as valuable, while about 58 percent is experienced as burdensome. The issue is not merely that compliance consumes time; it is that a majority of that time is experienced as friction rather than mission-advancing governance work. Second, the small-LEA analyses indicate that the “small system” problem is less about more total hours and more about the conditions under which those hours are produced. Smaller LEAs do not report dramatically higher compliance hours, but they do report more negative LCFF/LCAP beliefs and higher

friction, suggesting that role multiplexing may help account for part of this pattern. Superintendent/principal roles are concentrated in the smallest systems and are associated with lower governance alignment and lower valuable shares of compliance time. This suggests that formally uniform state requirements can be capacity-regressive in practice. These findings raise a broader policy design question: to what extent should legal and regulatory requirements be uniform across all local education agencies when organizational capacity varies so substantially across contexts?

Administrative Architecture Shapes (and Dampens) the Experience of Values-Driven Professionals

The literature on professional identity, burnout, and organizational capacity helps explain why these findings matter beyond workload alone. The friction items most strongly associated with negative net value-burden are those that indicate the displacement of student-focused priorities and reduced time for planning and design. These are not minor inconveniences. They point to ways in which administrative structures may constrain leaders' capacity to act as instructional, strategic, and community-facing professionals. Seen this way, compliance burden is not only about paperwork; it is also about how administrative systems shape the use of leadership time and organizational attention.

The LCFF findings reinforce this interpretation. Administrators report that the LCAP remains intended as a guiding planning instrument, but many also describe it as increasingly difficult to use in that way. Read together with more negative LCFF/LCAP beliefs in smaller LEAs and the documented post-LCFF growth in programs, reporting requirements, resource codes, and instructional text, the results suggest an implementation paradox: a reform intended to simplify governance and strengthen local control has been overlaid with accumulating proof requirements that make its central planning instrument harder to use for improvement.

The strong rule orientation of education administrators makes this argument more compelling. Administrators are not responding as a rule-averse workforce. Nearly nine in ten selected flexible-application, innovation-within-boundaries, or strict-compliance orientations. That means the burden documented here is being reported by professionals who are broadly disposed to take rules

seriously. For California policymakers, that should be understood as a warning sign of design strain, not as an attitudinal rejection of public accountability.

Implications for Policy Design

This study has several implications for California policymakers.

Accountability and Compliance Friction Are Distinct

One implication of the findings is that accountability and compliance friction are analytically distinct. Administrators do not reject compliance uniformly. Instead, they distinguish between activities that support equity, accountability, and improvement and activities experienced as duplicative, distracting, or procedurally burdensome. This suggests that debates about compliance are often less about whether accountability should exist than about how it is operationalized in practice.

The Current System Reflects Regulatory Accumulation

A second implication is that the compliance burden appears to stem, in part, from regulatory accumulation. Administrators most frequently identify added requirements, the removal of older ones, and duplication across plans and processes as the primary sources of burden. This pattern suggests that burden is shaped not only by the content of individual requirements but also by the cumulative layering of obligations over time.

Burden Is Concentrated in a Small Number of Governance-Critical Domains

A third implication is that compliance burden is concentrated rather than diffuse. Five domains account for a large share of reported compliance time: special education, fiscal and budget reporting, LCAP processes, student support programs, and human resources compliance. This concentration highlights the importance of these domains in the administrative life of LEAs and suggests that compliance burden is most consequential where governance demands are already substantial.

Formally Uniform Requirements May Have Uneven Effects

A fourth implication is that formally uniform requirements may operate unevenly across organizational contexts. Smaller LEAs do not report dramatically higher compliance hours, but they do report higher friction and more negative beliefs about the accountability system. This pattern suggests that burden is shaped in part by administrative capacity, role specialization, and the ability to distribute work among personnel.

Administrator Perceptions of Duplication Are Policy-Relevant

A fifth implication is that administrator perceptions provide useful information about how compliance systems function in practice. Requirements experienced as low-value, duplicative, or poorly aligned may be implemented differently from those seen as governance-supporting. Whether every instance of perceived overlap would qualify as formal duplication under external review, these perceptions suggest that many administrators experience planning and reporting requirements as insufficiently integrated — and that this experience may affect engagement, attention, and the quality of local implementation. At the same time, evidence of perception does not establish whether a requirement is objectively unnecessary or ineffective. The findings, therefore, speak most directly to implementation experience rather than to the ultimate effectiveness of governance instruments.

Implementation Infrastructure Shapes Compliance Experience

A final implication is that compliance burden is shaped not only by statutory requirements, but also by implementation infrastructure. Differences across roles and LEA types suggest that guidance, timelines, technical assistance, data-system interoperability, templates, and the distribution of responsibility all influence how burdensome a requirement becomes in practice. This is evident in the data: county offices of education rated several activities, including budget reporting and LCAP development, as having higher governance benefits and lower friction than school districts operating under the same statutory requirements. That difference is not explained by the requirements themselves but by the organizational context in which they are implemented. This implies that compliance burden is partly a function of policy design and administrative architecture, not solely of

legal mandate, and that targeted investments in implementation support may reduce burden without changing the underlying requirements.

Implications for Practitioners

For practitioners, one important implication is that compliance functions more like a portfolio of recurring activities than a single, undifferentiated administrative burden. The governance-benefit/compliance-friction framework highlights meaningful differences across activities and helps distinguish work experienced as governance-supporting from work experienced primarily as frictional. Activities that combine governance importance with high friction appear especially consequential for local operations, as they consume time and generate strain. Activities that are experienced as low-governance and high-friction appear more likely to be treated as procedural obligations rather than as part of an LEA's substantive improvement infrastructure.

Role Fit and Organizational Placement

A second implication is that role fit matters. The findings show that the same activity is experienced differently depending on who carries it out. Finance-related reporting, for example, is experienced differently by chief business officials and superintendents, and superintendent/principal roles in smaller systems report especially high friction. The results also show that the compliance burden is concentrated in a limited set of recurring domains rather than being evenly dispersed across many minor tasks. Special education administration, fiscal reporting, LCAP-related planning, student support programs, and human resources compliance account for a large share of reported workload. Among administrators who report time in these domains, the associated time commitments are substantial, ranging from roughly 4 to 7.5 hours per week per domain.

These patterns suggest that the compliance burden is shaped in part by how responsibilities are distributed within organizations. In larger systems, this appears as a question of alignment between technical requirements and role specialization. In smaller systems, it appears to be more of a question of whether thinly staffed organizations have enough capacity to absorb recurring compliance work without displacing other leadership responsibilities.

Internal Coherence Across Reporting Processes

A third implication is that local compliance experience depends in part on whether reporting processes are internally coherent or fragmented. The findings on duplication, overlapping planning requirements, and negative perceptions of LCAP-related work suggest that compliance becomes more frictional when similar information must be recreated across multiple documents, timelines, and audiences. This implies that local administrative burden is affected not only by the number of requirements but also by the degree of integration across reporting processes.

The results also suggest that the LCAP is often experienced less as a singular planning instrument than as one element within a broader reporting environment. Where local systems can connect planning, reporting, and public communication more coherently, the same formal requirements may be experienced differently. In that sense, the compliance burden appears to be related not only to reporting volume but also to the structure and internal organization of evidence, narrative, and communication.

Planning Time and Relationship-Based Work

A fourth implication is that planning time and relationship-based work are central to administrators' experience of compliance burden. The friction items most strongly associated with negative net value-burden are those indicating that compliance work distracts from student-focused priorities and reduces time for planning and design. This suggests that the practical effects of compliance burden extend beyond hours worked alone. They also involve the extent to which compliance demands collide with activities that administrators associate with strategy, instructional leadership, and engagement.

This pattern is especially relevant in smaller systems, where similar compliance demands may be more difficult to absorb without disrupting other responsibilities. The findings, therefore, imply that the organizational experience of burden depends partly on whether compliance work can be integrated into administrative routines without repeatedly displacing planning, school-facing work, and relationship-building responsibilities.

County Offices as Capacity Intermediaries

For county offices of education, the findings point to a distinctive practical implication. Because burden appears partly mediated by capacity, county offices occupy an important position in the broader compliance infrastructure for smaller LEAs. The results suggest that the experience of burden is shaped not only by state requirements themselves, but also by the availability of templates, technical assistance, data support, reporting expertise, and coordination structures that help smaller systems absorb those requirements. In this sense, county offices appear to function as potential capacity intermediaries within California's accountability system, particularly where local staffing is thin and role specialization is limited.

Limitations

This study provides systematic documentation of the magnitude and distribution of compliance workloads, as well as administrators' perceptions, across California's LEA administrative workforce. However, several methodological and conceptual limitations constrain the conclusions that can be drawn from these findings.

Measurement of Time and Perceptions

All time-use estimates are self-reported and subject to measurement error inherent in retrospective recall. Research on time-use estimation consistently finds that survey-based reports diverge from time-diary measures, with the direction and magnitude of bias depending on activity salience and social desirability. Administrators may overestimate time spent on compliance activities if these tasks are particularly salient, frustrating, or identity-relevant, or they may underestimate if compliance work is distributed across fragmented tasks rather than concentrated blocks of time. The study reports sensitivity analyses applying conservative adjustments (10-25% reductions) to account for potential overestimation; even under these adjusted scenarios, compliance represents a substantial share of work time. However, the precise magnitude of compliance hours cannot be determined without validation against direct observation or time-diary data.

Similarly, all value and burden ratings reflect administrator perceptions rather than objective measures of governance effectiveness or procedural efficiency. An activity rated as low-value by administrators may nonetheless serve critical functions in equity protection, accountability, or transparency. Conversely, an activity rated as high-value may fail to achieve its intended purposes when assessed against objective criteria. The study's central empirical contribution is documenting how administrators perceive and experience compliance requirements; it does not—and cannot—determine whether those perceptions align with actual governance effectiveness.

Absence of Baseline and Comparative Data

The study establishes statewide estimates of compliance workload in 2024-25 but provides no baseline data from prior years. Without pre-LCFF measurements, the study cannot assess whether compliance burden has increased, decreased, or remained stable since the 2013 reforms intended to reduce regulatory requirements. References to "continued" or "substantial" compliance workload in the post-LCFF era describe current conditions but do not demonstrate change over time.

Similarly, the study provides no comparison to other states' compliance systems. The finding that California administrators spend approximately 20 hours per week on compliance cannot be interpreted as unusually high or low without a systematic comparison to administrators' workloads in other large, diverse states operating under the same federal statutory framework. Whether California's accountability and reporting structures impose a greater or lesser burden than comparable states remains an open empirical question.

Sample Representativeness and Response Bias

The analytic sample of 909 administrators represents approximately 12% of California's estimated 7,500 LEA central office administrators and includes respondents from 504 LEAs (20% of all LEAs). Response rates varied by LEA type and role, with traditional school districts and county offices of education overrepresented relative to charter schools. Post-stratification weights adjust for observable differences between respondents and the statewide population on LEA type, enrollment size, and geographic locale. However, weights cannot correct for unobserved differences between respondents

and non-respondents. Administrators who chose to complete a survey about compliance burden may hold systematically different views or experiences than those who did not respond.

The 12% completion rate raises the possibility of nonresponse bias. If administrators experiencing the greatest compliance burden were more motivated to participate, the study may overestimate the statewide workload. Conversely, if the most time-constrained administrators were least likely to complete a lengthy survey, the study may underestimate the burden. Logistic regression analyses of response probability indicate that larger LEAs, traditional districts, and certain roles were more likely to respond, but these analyses cannot rule out selection on unobserved characteristics such as attitudes toward compliance or available time.

Inability to Establish Causality or Validate Reported Duplication

The study's cross-sectional survey design precludes causal inference. The finding that administrators allocate more time to activities they rate as valuable does not establish that perceived value causes increased effort; both may reflect unmeasured characteristics of activities, roles, or organizational contexts. Similarly, the association between small LEA size and reported strain does not demonstrate that enrollment causes burden; this relationship may reflect correlated factors such as administrative staffing ratios, technological infrastructure, or regional characteristics.

Administrator reports of duplication across multiple plans and processes represent perceptions rather than verified informational redundancy. Eighty percent of administrators identify duplication as a burden driver, but this study does not independently validate whether the same information is required by multiple statutory authorities or whether perceived overlap reflects distinct requirements serving different purposes. Determining actual duplication would require a systematic content analysis of statutory language, regulatory guidance, and reporting templates to map informational requirements across programs and distinguish genuine redundancy from surface similarity.

Scope and Generalizability

The study focuses exclusively on LEA central office administrators and does not capture compliance workload at other system levels. School-site administrators such as principals and assistant principals face their own compliance demands, as do classroom teachers. County offices of education and the California Department of Education bear compliance responsibilities not measured in this study. The statewide estimates, therefore, represent only one component of the total system compliance effort.

Additionally, the study measures compliance activities but does not assess their outcomes. The findings document time spent on special education administration, fiscal reporting, and accountability planning but provide no evidence that these activities ensure appropriate services for students with disabilities, prevent fiscal mismanagement, or improve the quality of local planning. Compliance workload and compliance effectiveness are conceptually distinct; this study measures only the former.

What These Findings Can and Cannot Support

Given these limitations, the study's findings support several claims while leaving others unresolved. The data establish that administrators report substantial time devoted to compliance, that this time is concentrated in specific domains, and that most activities are perceived as more burdensome than valuable. The findings document systematic variation in perceptions across roles and organizational contexts and demonstrate that governance value and administrative friction are empirically separable constructs.

However, the findings cannot determine whether current compliance levels are appropriate, excessive, or insufficient relative to governance needs. They cannot establish whether compliance activities achieve their intended purposes or whether alternative accountability designs would better balance governance protections with administrative efficiency. They cannot demonstrate whether reducing compliance burden would improve student outcomes, increase organizational effectiveness, or compromise equity protections. Answering these questions requires measurement of compliance outcomes, experimental or quasi-experimental variation in requirements, baseline and comparative

data, and content analysis of actual statutory and regulatory mandates—none of which this study provides.

The study's contribution is to make compliance workload visible as a measurable feature of California's education system and to document how administrators experience accountability requirements. Determining whether this structure serves its intended governance purposes remains a distinct empirical question requiring different methods and data.

Future Research

The next phase of research should move from documenting burden to testing reformable mechanisms. One priority is a formal crosswalk of LCAP, SPSA, SARC, and program-specific requirements to determine which duplications are real, which are only perceived, and which reflect distinct purposes expressed through overlapping forms. A second priority is time-diary or observational validation of administrator compliance time. A third is comparative work across states, since California now has a framework that could support more systematic study of how different accountability architectures distribute burden across implementers.

Future research should also evaluate concrete redesigns suggested by practitioners and implied by the findings: unified planning/reporting structures, risk-based oversight, shared-service models for small LEAs, interoperable data submission systems, and simplified public reporting formats. The future research agenda already outlined in the draft—mapping signal domains to experience domains, developing a sediment ratio, and tracing the temporal alignment between regulatory growth and lived burden—could position California not just as a case of compliance strain but as the leading case of evidence-based compliance reform in public education.

The line that gives this version its punch is this: California does not need less accountability; it needs less duplicate proof of accountability. That is the frame that makes the paper more persuasive to both Sacramento and local practitioners, because it preserves equity guardrails while making clear that administrative architecture is now a central policy problem.

Conclusion

This study documents the scale, structure, and perceived function of compliance work in California's public education system more than a decade after the adoption of the Local Control Funding Formula. By quantifying administrator time, identifying where compliance workload is concentrated, and distinguishing between governance value and administrative friction, the analysis provides a systemwide baseline for understanding how accountability and reporting requirements operate in practice. The findings indicate that compliance functions simultaneously as governance infrastructure and as a source of organizational constraint, reflecting the cumulative layering of mandates across state and federal policy arenas. Making the magnitude and distribution of compliance work visible clarifies how regulatory design shapes the allocation of administrative capacity within California's education system. In doing so, the report situates compliance as a central feature of state governance of public education.

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Appendix 1. Key Terms and Definitions

State law. Includes all laws, decisions, or legal precedent of a State action having the effect of law of any State. A law of the United States applicable only to the District of Columbia shall be treated as a State law rather than a law of the United States.[2]

State regulation. A rule or standard, enacted by a state government agency, has the force of law within that state's jurisdiction, often implementing or interpreting a state statute.[3] Authority for state regulators, i.e., state government agencies, which are empowered to do so by state laws. States have primary authority and control over the governance and operation of public schools, unless the U.S. Constitution specifies otherwise.[4] The purpose of regulations is to implement, interpret, or enforce laws or court decisions. State regulations also have the *force of law* and therefore can carry penalties for violations. Regulations encompass a broad range of areas, including public safety, health, the environment, education, and other related fields. State regulations differ from federal regulations, which are established by the federal government and apply nationwide. State regulations operate within the context of individual state laws and constitutions.

Compliance. In the context of public education, it means adhering to all applicable state laws, regulations, and policies governing education, including school operations, curriculum, and student rights. The scope of compliance in public education is wide-ranging.[5] The formal process of understanding and complying with relevant laws, regulations, professional standards, and policies.[6] Compliance ensures that school districts operate in accordance with the legal and regulatory requirements set by the Department of Education and other relevant agencies.

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[2] 29 USC S 1144(c)(1)
[3] Merriam-Webster 'Regulation'; Law:Statutes & Regulations by Research Guides and State Regulations by Fiveable
[4] ADA.gov State and Local Government
[5] School operations - facilities, safety, and staffing; Curriculum - Adhering to state-adopted academic standards and curriculum frameworks; Student rights - Protecting students' rights, including those with disabilities, and ensuring equitable access to education; Funding - Properly using state and federal funds allocation for education; Assessment - Participating in state-mandated assessments and reporting student performance; Financial Management: Properly managing and accounting for public funds, including state and federal grants. Student Safety: Implementing and maintaining comprehensive school safety plans. Academic Standards: Adhering to state educational standards and curriculum frameworks. Audits: Completing annual audits aligned to the K–12 LEA Annual Audit Guide. Special Education: Ensuring that students with disabilities receive appropriate individualized education programs (IEPs) and services.
[6] Compliance. Teachers College Columbia University.

Administrative burden. Refers to the costs individuals experience when interacting with a bureaucracy, including learning costs (such as understanding rights and rules), compliance costs (meeting bureaucratic demands), and psychological costs (including stress, frustration, and feelings of disempowerment). Four types of expenses, including: (1) learning [understanding rights and rules], (2) compliance [meeting bureaucratic demands], and (3) psychological [stress, frustration].

Local control. Assignment of responsibility of governance and management of public schools to local education agencies (LEAs) to either the governing board and/or the Superintendent of schools and their staff.

Appendix 2. Extended Methodology

This study used a stratified sampling design to generate statewide estimates of compliance burden among California central-office education administrators. The final analytic population consisted of approximately 7,569 education administrators employed in California local educational agencies (LEAs). For LEA-level response tracking and weighting, the cleaned organizational frame used in the study included 2,499 LEAs, consisting of 950 school districts, 1,361 charter schools, 53 county offices of education (COEs), and 135 special education local plan areas (SELPAs). These final frame counts were used for response-rate calculations, target tracking, weighting, and statewide estimation. Earlier planning estimates based on alternative administrator-per-LEA assumptions were superseded once the verified study frame was finalized.

Primary strata were California's 58 counties. Secondary strata were LEA type, enrollment band, and geographic locale. In the final analytic file, enrollment was organized into six bands: <500, 500–1,000, 1,001–2,500, 2,501–5,000, 5,001–10,000, and 10,001+ students. To ensure adequate representation of smaller and rural systems, the study applied oversampling rules and county-level minimum targets during recruitment.

Using finite population correction and assuming a design effect of 1.5, we estimated that 750 completed surveys would provide statewide estimates with a margin of error of approximately ±5 percent at the 95 percent confidence level. For operational planning, we also used a practical LEA-type domain target of 609 completes (485 base + 124 reserve) to protect subgroup reporting capacity during fieldwork and replacement.

Recruitment invitations were distributed via email to approximately 7,500 administrators using California Department of Education contract-roster data, verified and supplemented with association partner lists. Of the approximately 7,500 invited administrators, 1,404 initiated the survey and 909 completed all core items. The final analytic sample includes administrators from 503 distinct LEAs, representing 20 percent of the 2,499 LEAs in the final frame. The median number of respondents per LEA was 2 (range: 1–12). Administrators in 39 of California's 58 counties completed surveys, and county-level response targets were met or exceeded in 47 counties.

Table A2.1. Final LEA Frame, Base Targets, Reserve, and Achieved LEA Participation

LEA Type	Final LEA Frame Count	Share of LEA Frame	Base	Reserve	Target	Achieved LEAs
Charter School	1,361	53%	141	36	177	93
School District	950	37%	137	35	172	353
SELPA	135	5%	126	32	158	15
County Office of Education	53	2%	81	21	102	39
Total	**2,499**	**100%**	**485**	**124**	**609**	**503**

Note. Base and reserve counts are the operational recruitment targets used during fieldwork. Achieved LEAs refers to the number of distinct LEAs represented in the completed survey sample. These figures correspond to the final cleaned study frame and replace earlier planning tables that relied on alternative administrator-per-LEA assumptions.

2.2 Public Data Sources, Population Benchmarks, and Weighting

This appendix also documents the public-data benchmarks used to evaluate representativeness and construct post-stratification weights. No single current California public file provides direct statewide counts for the exact administrator-role categories used in this study (for example, superintendent, chief business official, director, manager, coordinator, or executive assistant) or for the exact functional-area categories used in the sample benchmarks. As a result, statewide role and functional-area counts should be understood as proxy benchmark estimates, not as a separate or competing population frame. The control total for those benchmark estimates is the final study population of 7,569 central-office administrators.

Data sources used for benchmark construction included:

- California Department of Education public school and directory files for structural counts of districts, charter schools, county offices of education, SELPAs, and related entity characteristics;
- California Department of Education staff and directory resources, including historical assignment files and statewide directories that inform role classification;
- National Center for Education Statistics Common Core of Data and related ELSi benchmarks for broad administrator and administrative-support staff categories.

The estimation logic was as follows. First, the statewide administrator total of **7,569** was treated as the control total for the role and functional-area sections. Second, superintendent and chief business official counts were anchored to one district- or county-office leader per entity where those roles could be directly inferred from public directory structures. Third, the remaining administrators were allocated across the other role categories using the observed survey-role distribution. Functional-area estimates were built using the same control total, with curriculum and instruction assigned a lower-bound floor and remaining counts allocated across superintendent-office/executive support, fiscal/operations, human resources, special education, and state/federal programs.

These public-data benchmarks were used for two purposes: to compare the achieved sample with the statewide administrator workforce and to construct post-stratification weights aligned to the statewide distribution of role type, LEA type, and enrollment band. They were not used as an alternative study population for the survey itself.

2.3 County-Level Tracking and Target Calculations

County-level targets were used as an operational recruitment tool rather than as a commitment to publish county-level estimates at a common precision threshold. In principle, requiring each county to function as a fully powered reporting domain would have required a substantially larger statewide sample. For that reason, county-level targets were used primarily to monitor geographic coverage during fieldwork, guide reminder outreach, and ensure that the final sample included broad statewide

representation across California's 58 counties. The county-response table is retained for transparency regarding field operations and achieved geographic spread.

2.4 Compliance Activities and Development Characteristics

The survey asked respondents to allocate their compliance time across a defined set of compliance activity categories developed from prior documentation, administrative materials, and review with California education administrators. The final list of activity categories used in the time-allocation grid is retained below without substantive change.

2.3 Sampling versus Target Calculations

Table A2.5. Respondents by California County Compared to Sample targets

Cty Cd	County	Enroll	Enroll %	LEA Admin	Base Alloc	25%_Res	Target w	%Enroll Shar	Count	Diff
19	Los Angeles	1,275,769	22.00%	6,108	165	42	207	0.02%	91	-74
37	San Diego	476,844	8.20%	2,682	62	16	78	0.02%	110	48
30	Orange	429,869	7.40%	1,831	56	14	70	0.02%	52	-4
33	Riverside	419,992	7.20%	1,820	54	14	68	0.02%	37	-17
36	San Bernardino	396,773	6.80%	2,012	51	13	64	0.02%	55	4
34	Sacramento	258,235	4.40%	1,268	33	9	42	0.02%	39	6
43	Santa Clara	231,385	4.00%	1,129	30	8	38	0.02%	22	-8
1	Alameda	210,736	3.60%	1,107	27	7	34	0.02%	18	-9
10	Fresno	206,465	3.60%	1,256	27	7	34	0.02%	14	-13
15	Kern	198,992	3.40%	1,415	26	7	33	0.02%	23	-3
7	Contra Costa	169,261	2.77%	728	20	5	26	0.01%	23	3
39	San Joaquin	155,659	2.54%	719	19	5	24	0.01%	23	4
56	Ventura	122,810	2.01%	757	15	4	19	0.01%	10	-5
50	Stanislaus	107,205	1.75%	723	13	3	16	0.01%	12	-1
54	Tulare	102,924	1.68%	686	12	3	16	0.01%	30	18
41	San Mateo	83,855	1.37%	543	10	3	13	0.01%	15	5
31	Placer	77,048	1.26%	355	9	2	12	0.01%	17	8
27	Monterey	72,224	1.18%	404	9	2	11	0.01%	12	3
42	Santa Barbara	67,011	1.10%	352	8	2	10	0.01%	18	10
49	Sonoma	64,798	1.06%	426	8	2	10	0.01%	15	7
48	Solano	59,806	0.98%	405	7	2	9	0.01%	4	-3
24	Merced	59,478	0.97%	356	7	2	9	0.01%	9	2
38	San Francisco	56,701	0.93%	127	7	2	9	0.01%	1	-6
44	Santa Cruz	37,287	0.61%	322	5	1	6	0.01%	14	9
13	Imperial	35,390	0.58%	271	4	1	5	0.01%	11	7
40	San Luis Obispo	32,744	0.54%	195	4	1	5	0.01%	12	8
20	Madera	32,284	0.53%	236	4	1	5	0.01%	15	11
9	El Dorado	32,270	0.53%	137	4	1	5	0.01%	12	8
21	Marin	30,077	0.49%	209	4	1	5	0.01%	3	-1
4	Butte	29,737	0.49%	135	4	1	4	0.01%	17	13
57	Yolo	29,590	0.48%	154	4	1	4	0.01%	4	0

5	Yolo	29,590	0.48%	154	4	1	4	*0.01%*	4	0
16	Kings	29,512	0.48%	220	4	1	4	*0.01%*	8	4
45	Shasta	26,588	0.43%	163	3	1	4	*0.01%*	22	19
51	Sutter	25,420	0.42%	95	3	1	4	*0.01%*	0	-3
28	Napa	18,585	0.30%	124	2	1	3	*0.01%*	7	5
12	Humboldt	17,177	0.28%	154	2	1	3	*0.01%*	19	17
58	Yuba	16,077	0.26%	147	2	0	2	*0.01%*	6	4
23	Mendocino	12,757	0.21%	152	2	0	2	*0.01%*	17	15
35	San Benito	12,035	0.20%	40	1	0	2	*0.01%*	19	18
29	Nevada	11,419	0.19%	109	1	0	2	*0.01%*	8	7
52	Tehama	10,738	0.18%	103	1	0	2	*0.01%*	6	5
17	Lake	10,172	0.17%	94	1	0	2	*0.01%*	4	3
11	Glenn	6,589	0.11%	48	1	0	1	*0.01%*	2	1
55	Tuolumne	5,741	0.09%	24	1	0	1	*0.01%*	3	2
47	Siskiyou	5,581	0.09%	41	1	0	1	*0.01%*	17	16
5	Calaveras	5,260	0.09%	38	1	0	1	*0.01%*	4	3
6	Colusa	4,613	0.08%	22	1	0	1	*0.01%*	3	2
3	Amador	4,059	0.07%	33	0	0	1	*0.01%*	0	0
8	Del Norte	4,003	0.07%	40	0	0	1	*0.01%*	0	0
14	Inyo	3,952	0.06%	16	0	0	1	*0.01%*	2	2
18	Lassen	3,757	0.06%	24	0	0	1	*0.01%*	8	8
32	Plumas	2,035	0.03%	13	0	0	0	*0.01%*	4	4
22	Mariposa	1,878	0.03%	29	0	0	0	*0.01%*	1	1
26	Mono	1,644	0.03%	9	0	0	0	*0.01%*	3	3
53	Trinity	1,601	0.03%	13	0	0	0	*0.01%*	7	7
25	Modoc	1,334	0.02%	9	0	0	0	*0.01%*	1	1
46	Sierra	414	0.01%	7	0	0	0	*0.01%*	0	0
2	Alpine	61	0.00%	3	0	0	0	*0.01%*	0	0
	Total	**5,806,221**	**100%**	**30,638**	**737**	**188**	**925**		**909**	**172**
	Non-valid response								*397*	
	County Threshold Achieved								*45*	*58*

2.4 Compliance Activities and Development Characteristics

Table A2.6. Compliance Activities Options

Category #	Compliance Activities Options Offered in the Education Administrator Survey
1	***Adult Education:*** WIOA, apprenticeships
2	***Other schools:*** Dashboard alternative school status, juvenile court schools
3	***Audits:*** Completing annual audits aligned to the K–12 LEA Annual Audit Guide
4	***Elementary Instruction:*** K-3 grade adjust, TK, Kinder Continue, RII grant, Universal PreK reports
5	***High School Instruction / College & Career Readiness:*** CA Community College Apply, A-G Completion Improve, CTE Grant, Dual Enrollment Grant, Seal of Biliteracy / Civic Engagement
6	***Instruction:*** Minutes, Time
7	***Local Control Accountability Plan (LCAP)***
8	***Middle School Instruction:*** TUPE or similar programs
9	***Special Education:*** Data eval and analysis, IDEA reporting, infant funding, out-of-home care
10	***Student Safety and Health:*** Comprehensive school safety plan, immunizations
11	***Finance Attendance***: Enrollment, LCFF pupil counts, CALPADS, CBEDS
12	***Finance EPA Accounts:*** Gann limit, Mandate Block Grant, Apportionment
13	***Finance Federal Reporting:*** ESSA per pupil expenditure reporting, federal spending reporting
14	***Finance: Home to school transportation***: other financial reporting
15	***Finance: Independent Study***
16	***SPSAs, SARCs, and/or Williams Reporting***
17	***Supplemental Student Support:*** Community schools, ELOP, ASES, Prop 28 reporting, learning recovery emergency block grant, foster youth, migrant ed, CARS
18	***Teachers and Classified Staffing:*** Certification and misassignment, early retirement incentive, ratio of admin employees to teachers, and educator effectiveness
19	***Public Records Requests***
20	***Other (Text Box)***

Appendix 3. Developing Master List of Compliance Activities in California

Table A3.1. Compliance Activities by Source

List compiled using prior documented sources and validated with California education administrators.

Compliance Activity	CDE	CSBA	Controller
Special Education: Ensuring students receive appropriate individualized education programs (IEPs) services.			
IDEA and Special Ed Data Evaluation and Analysis (DEA)	x	x	x
Special Ed: Infant Funding / Out of Home Care		x	
Financial Management: Managing and accounting for public funds, including state and federal grants.			
Finance: Attendance, ADA, Enrollment, LCFF counts, CALPADS,			x
Finance: Independent Study			x
Finance: EPA accounts, Gann limit, Mandate Block Grant, Apportionment			
Finance: Home to school transportation, other			
ESSA Per Pupil Expenditure Report		x	
Student Safety & Health: Implementing and maintaining comprehensive school safety plans.			
Comprehensive School Safety Plan	x		
Immunizations	x		
High School / College & Career Readiness			
Academic and subject matter standards implementation		x	
California Community College Applications		x	
A-G Completion Improvements		x	
CTE Incentive Grants		x	
Dual Enrollment Opportunities Grant		x	
Seal of Biliteracy / Seal of Civic Engagement		x	
Middle or early college programs		x	
Elementary Instruction			
K-3 grade span adjustments / Special education inclusion K-3			
Transitional Kindergarten expansion / Kindergarten continuation			x
Universal PreK reporting			x
RII grant reporting			
Middle School Instruction			
Tobacco Use Prevention and Education (TUPE)		x	

Instructional Time			
Instructional Minutes			
Audits: Annual LEA audits aligned to the K–12 LEA Annual Audit Guide			x
Preparation of required documents from independent auditors			x
Management letter as part of the LEA's annual audit			x
Local Control and Accountability Plan			
Local Control and Accountability Plan			
SPSAs, SARCs, and Williams			
School Accountability Report Card (SARC)	x		x
Williams (Instructional Materials, Teacher Quality, and Facilities)			x
Single Plan for Student Achievement (SPSA)			
Supplemental Support Monitoring: Compliance and Improvement Monitoring (CIM) process.			
Community Schools			x
Expanded Learning Opportunities Program Grant	x		x
After School Education Support		x	
Proposition 28: Arts & Music Block Grant	x		x
Learning Recovery Emergency Block Grant Reports			x
Federal Title I, II, III, IV Program Reports			x
California Aging Reporting System (CARS)		x	
Foster Youth (ISSPO)		x	
Migrant Education and Information Network		x	
Nutrition Program		x	
Adult Education Office Grants			
WIOA grant filing, monitoring, and reporting		x	
Teachers and Classified Staff			
Certification and misassignment	x		
Early retirement incentive	x		
Ratio of admin employees to teachers	x		
Other			
Dashboard Alternative School Status (DASS) Reporting			x
Juvenile court schools	x		
Apprenticeship: related and supplemental instruction	x		

Appendix 4. Extended Literature Review

4.1 Legal and Constitutional Foundations

The existence of state regulation in public education flows directly from the constitutional structure of American federalism. The Tenth Amendment reserves to the states powers not delegated to the federal government, and education has historically been understood as a state responsibility. Like all states, California has established an extensive legal and regulatory apparatus to govern its public schools.

The purposes of state compliance mechanisms include, among others:

- **Ensuring Accountability:** Compliance requirements create paper trails and documentation that allow oversight bodies, such as the Legislature, the State Auditor's Office, and the State Controller's Office, to verify that public funds are spent as intended and that educational standards are maintained.
- **Protecting Students and the Public:** Regulations related to safety, civil rights, special education, and student privacy serve protective functions, and compliance activities help operationalize them within schools and school systems.
- **Monitoring and Improvement:** Compliance data ostensibly inform state-level decisions about which schools and districts require intervention, support, or recognition.
- **Promoting Equity:** Many compliance requirements—particularly those tied to federal funding through laws such as the Every Student Succeeds Act (ESSA), Individuals with Disabilities Education Act (IDEA), and civil rights statutes such as Title IX—aim to ensure that disadvantaged student populations receive services and resources that create commensurate access to opportunities as their better-off peers.

4.2 Psychological and Professional Consequences of Compliance Work

Compliance and Professional Identity. This literature review argues that one of the most significant yet underexplored consequences of compliance burden is its effect on the professional identities and psychological well-being of educational administrators. Research on illegitimate tasks—work tasks that do not meet employee role expectations and violate professional identity—provides a useful lens (Semmer et al., 2007). When education administrators entered their profession, most did so with expectations of leading instructional improvement, supporting teachers, serving students, and building school communities. Compliance activities—particularly those perceived as bureaucratic exercises with limited connection to student outcomes—may be experienced as violating these professional expectations.

Research by Maslach and Leiter (2005) identifies six sources of burnout, several of which are directly relevant to compliance work in the field of public education, including: *values mismatch* (when work tasks conflict with personal or professional values); *lack of control* (when individuals cannot influence decisions about their work); *insufficient reward* (when effort is not acknowledged or does not produce outcomes); and *meaningless tasks* (when required activities feel disconnected from purpose).

The Cumulative Effect of Low-Value Compliance. Research on burnout in helping professions–such as public education–shows that psychological exhaustion stems not from workload alone but from the interaction between work demands and the perceived meaningfulness of that work (Bakker et al., 2000; Demerouti et al., 2001). The Job Demands-Resources model suggests that when job demands persistently exceed available resources or rewards, individuals become burned out and may psychologically distance themselves from their work. For education administrators, this raises a critical concern: prolonged engagement in compliance activities perceived as low value may lead to professional disengagement that extends beyond the tasks themselves. Administrators may develop what the California School Boards Association described as a *"compliance mentality"*—an orientation toward doing what is required rather than what is optimal, toward satisfying external requirements rather than pursuing excellence.

This compliance mentality may manifest as:

- **Performative Documentation:** Documentation perceived as primarily procedural rather than substantively useful.
- **Risk Aversion:** Avoiding innovative thinking, behaviors, and approaches that might attract scrutiny
- **Goal Displacement:** Prioritizing measurable compliance outcomes over harder-to-quantify educational improvements
- **Professional Cynicism:** Developing skepticism about the value of all regulatory requirements, including those that serve legitimate purposes

4.3 Compliance and Organizational Capacity for Transformation

The Opportunity Cost Framework. Every hour spent on compliance represents an hour not available for other activities. This opportunity cost framework, while simple, has profound implications for understanding how compliance shapes organizational capacity. Horng, Klasik, and Loeb (2010) documented that principals spent only about 10% of their time on instruction-related tasks—roughly one-third as much time as they devoted to administration. If principals could reallocate even a portion of their administrative time to instructional leadership, the implications for school improvement could be substantial. Research consistently finds that principal instructional leadership is among the most important in-school factors affecting student achievement (Grissom et al., 2021).

Compliance and Innovation Capacity. Ritchie (2014) argues that governments may be less likely to innovate than private organizations, in part because incentive structures encourage the maintenance of the status quo regardless of individual risk preferences. Compliance requirements may reinforce this tendency by consuming the discretionary time that might otherwise be devoted to experimentation; creating audit risks for organizations that deviate from established procedures; prioritizing compliance documentation over demonstrated results; and diverting administrators' attention from emerging opportunities to regulatory requirements. PPIC (2015) cautioned that, in California, LCAP templates and requirements risked becoming "unwieldy compliance documents," potentially subverting the reform's intent to empower local decision-making.

Gaps in Current Knowledge. Despite growing attention to administrative burden in public administration scholarship, significant gaps remain in understanding compliance in public education:

1. **Systematic Time-Use Data:** No comprehensive, representative study has documented how California education administrators allocate time across compliance and other activities.

2. **Cost Estimation:** The financial cost of compliance—in terms of personnel time, contracted services, and foregone opportunities—has not been systematically calculated for LEAs.

3. **Value Assessment:** Limited research has examined whether existing compliance requirements actually serve their intended purposes, or which requirements produce the greatest value relative to their burden.

4.4 Accuracy of Reported Time versus Actual Time Spent on Compliance Activities

This literature review synthesizes research on the discrepancy between self-reported and objectively measured work hours. The central finding across multiple disciplines is that survey-based estimates of work time systematically differ from time-diary or observational data, with the direction and magnitude of bias depending on the activity type, social context, and identity salience of the work reported. The research base suggests that stylized survey questions about work hours yield estimates that diverge from time-diary measures due to recall error, social desirability bias, and cognitive estimation heuristics. These measurement issues have been documented across the literature on labor economics, public administration, and family sociology.

Core Research on Work Hours Measurement Error. The foundational methodological literature establishes that weekly hours worked are poorly measured in frequently used survey data. Chou and Shi (2021) note that measurement error in the Current Population Survey (CPS) and the Panel Study of Income Dynamics (PSID) is nonclassical, meaning it is systematically correlated with actual hours worked. Im (2008) found similar patterns in a study of government employees across five Indiana agencies, in which salaried employees were contracted for 37.5 hours per week but perceived they were working about 41 hours—a mean overtime of 3.83 hours per week. This sample of government

employees is particularly relevant because it shows that even within the public sector, employees report working more hours than their contracts require.

Magnitude of Overestimation. Yavorsky, Kamp Dush, and Schoppe-Sullivan (2015) provide particularly compelling evidence from a longitudinal study comparing time-diary and survey data from the same individuals. These findings suggest that life circumstances and role demands systematically affect reporting accuracy, with more demanding contexts producing larger discrepancies between perceived and actual time use. Brenner (2011) provides theoretical grounding for why self-reported time use diverges from diary measures, drawing on research by Robinson and others. The literature consistently shows that time diaries reduce both systematic and random measurement error by using a chronological reporting procedure that avoids the normative biases inherent in stylized questions. This has direct implications for measuring compliance time: education administrators may overestimate the time they spend on compliance activities because diligent attention to regulatory requirements is part of their professional identity and role expectations. The act of asking administrators to estimate compliance hours may itself prompt upward bias.

Countervailing Evidence from Teachers and Street-Level Bureaucrats. Research on teachers' time-use estimation (Kautz-Turnbull et al., 2023, citing Fleck, 2009) suggests that teachers invest approximately 53 hours per week in teaching and extra-role time. This parallels the finding that California education administrators work approximately 51 hours per week, suggesting consistency in professional workload estimates across educational roles.

Methodological Considerations for Discount Estimation. The literature suggests different patterns of bias depending on the characteristics of the activity. These include total work hours, with moderate overestimation (typically 10-27% based on Yavorsky et al.'s findings); socially valued unpaid activities, with higher overestimation (20-50% for housework and childcare); and identity-salient professional activities, likely overestimated relative to identity importance. This is considered in light of factors that may amplify or moderate overestimation of compliance. Amplifying factors include professional identity, negative affect, diffuse boundaries, and policy feedback. Moderating factors include professional expertise, bounded estimation, and proportional thinking (e.g., estimates cluster at 50% FTE, etc., suggesting respondents think in proportional time, which may increase accuracy).

Discounted Estimate for Compliance Hours. We use a range-based discount approach rather than a single correction factor, given the inherent uncertainty in cross-validating across different activity types and populations. This method provides three estimates: conservative, moderate, and aggressive. All three estimates were calculated based on the 20.2 hours per week spent on compliance activities. The results were conservative (17.2 – 18.2 hours/week [10-15% discount]), moderate (15.2-16.2 hours/week [20-25% discount]), and aggressive (13.1-14.1 hours/week [30-35% discount]). Given the absence of time-diary validation data specifically for administrators' compliance activities, we chose the moderate-discount estimate, or 15.7 hours/week, as the primary finding and acknowledged the associated uncertainty (13-18 hours/week). This approach remains conservative relative to raw survey estimates, aligns with established methodological literature, and transparently acknowledges measurement uncertainty.

Discounted Estimate for Total Hours Worked. The preceding discount methodology specifically addresses measurement error in reported compliance hours. However, the total weekly work-hours estimate (51 hours) used as the denominator for calculating the compliance share also merits methodological scrutiny. The literature on measurement error in total hours reveals distinct patterns that warrant a separate discount approach. The rationale for applying lower discounts to total work hours is sound for several reasons. First, the reference to total hours worked is a more concrete, verifiable quantity than diffuse compliance activities. Education administrators likely track their time more carefully than the general population does, as shown in previous validation studies of students. Third, the structural bounds of a workweek provide natural anchors, such as arrival time, that improve estimation accuracy. All three estimates were calculated based on the 51.0 hours per week spent on compliance activities. The results were conservative (45.9 – 48.5 hours/week [5-10% discount]), moderate (43.4-45.9 hours/week [10-15% discount]), and aggressive (40.8-43.4 hours/week [15-20% discount]). Given the methodological literature and professional context, we chose the moderate-discount estimate, or 45 hours/week, as the primary finding and acknowledge the associated uncertainty (41-49 hours/week). This approach applies a more modest discount than the compliance-hours approach, reflecting the concreteness of total-hour estimates, and remains consistent with the methodological literature on professional workers.

Implications for Compliance Share Calculations. Combining these discount methods for both metrics yields the following adjusted compliance share estimates (reference: raw survey estimates of 40% of work time devoted to compliance (20.2 hours / 51 hours): an average of 34% of work time devoted to compliance (15.5 hours / 45 hours). The sensitivity range is 27-4% of work time devoted to compliance (13-18 hours / 41-49 hours).

4.5 Conceptualizing Administrative Orientation to Rules and Regulations

The survey instrument includes a measure designed to capture education administrators' orientation toward rules and regulations—specifically, how individuals interpret, apply, and respond to formal compliance requirements in public education systems. The construction of this item is grounded in a well-established body of empirical research in public administration, organizational theory, and behavioral decision-making.

At its foundation, the measure reflects the classical conception of bureaucracy, in which rules, hierarchy, and formal procedures are central to ensuring consistency, accountability, and legitimacy in public institutions (Weber, 1978). Subsequent empirical work, however, demonstrates that rule adherence in practice is not uniform. Research on frontline public service workers shows that public employees routinely exercise discretion in interpreting and implementing rules, particularly under conditions of resource constraint, ambiguity, and competing demands (Lipsky, 1980).

Building on this insight, the measure incorporates perspectives from administrative decision-making theory. Simon (1947/1997) demonstrated that decision-makers operate under conditions of bounded rationality, relying on heuristics and satisficing strategies rather than strict optimization. In this context, rules function not only as constraints but also as cognitive tools that guide judgment, allowing for varying degrees of flexibility in their application (Olsen, 2017).

More recent empirical work in public administration further complicates the role of rules by highlighting the tension between procedural compliance and mission-oriented outcomes. Research on public value suggests that public managers are often motivated to interpret or adapt rules in ways that better serve citizens and achieve policy goals (Moore, 1995). Complementary studies on prosocial rule-breaking and rule-following leadership demonstrate that deviation from formal rules

can occur in the service of equity, effectiveness, or responsiveness, particularly in human-centered domains such as education (Morrison, 2006; DeHart-Davis, 2017).

Taken together, this literature supports the conceptualization of rule orientation as a continuum rather than a binary construct. The response options used in this study are designed to reflect empirically observed behavioral archetypes along this continuum: from strict compliance (rule adherence as a professional obligation), to flexible application and bounded innovation (rules as adaptable constraints), to pragmatic balancing and rule-challenging (rules as subject to reinterpretation or reform). This structure captures variation in how administrators reconcile competing institutional logics—namely, procedural accountability and student-centered outcomes.

Importantly, prior research suggests that organizational context can shape these orientations, but also that strong institutional environments may normalize compliance as a professional expectation. The distribution of responses observed in this study—characterized by a high prevalence of compliance-oriented selections—aligns with evidence from accountability-driven public systems, where adherence to rules is both formally reinforced and culturally embedded.

Appendix 5. Analytical Methods (Technical)

5.1 EFA/CFA for Governance versus Friction Composites

To work towards understanding if, statistically, these items hang together we build three analysis blocks: (1) construct a governance and friction index from survey items, (2) test these indices across other variables, e.g., enrollment, role type, overwork, net value-burden score, and LCFF items, and (3) develop initial factor validation using exploratory factor analysis (EFA) and confirmatory factor analysis (CFA) to establish the relationship between these survey items.

Construct a governance and friction index from survey items

The governance index is based on survey items C1-C4, and the friction index is based on survey items C5-C8. C1–C8 are activity-by-activity agreement items asking respondents to rate whether the compliance activities they work on most are associated with (a) positive governance goals (equity, accountability, continuous improvement, local control) and (b) “compliance friction” (duplication, distraction from student priorities, decreased engagement/relationship-building, and reduced time for better resource choices). Responses appear as a 6-level ordered scale: Strongly disagree, Disagree, Somewhat disagree, Somewhat agree, Agree, Strongly agree. For summary displays, we report the share “agreeing” (Somewhat agree/Agree/Strongly agree). Each index is the share of times the respondent selected "somewhat agree," "agree," or "strongly agree" (the top 3 options on the 6-point scale). Net governance is then equivalent to Governance index minus Friction index, with a range of -1 to +1.

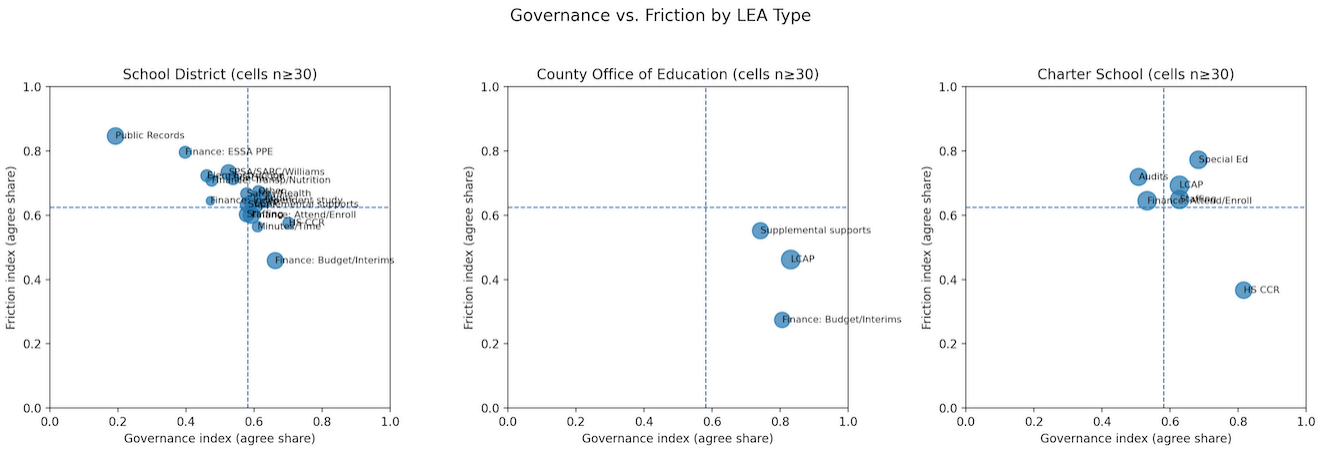
We conduct statistical significance tests examining net governance against several variables, including LEA type and role type. We find that net governance differs by LEA type for several compliance activities (FDR-controlled). Below are the activities with the strongest evidence of differences ($p_{FDR} < 0.05$).

Table A5.1. LEA Type: Strongest Activity Level Differences in Net Governance

Compliance Activity	Total *n*	Groups	Kruskal H	*p* value	*p* FDR	Epsilon Squared
LCAP	308	3	15.817	3.68e-04	0.00662	0.045
Alternative Schools	46	2	8.497	0.00356	0.0214	0.170
Audits	244	3	11.273	0.00357	0.0214	0.038
Finance: Budget/Interims	218	3	10.026	0.00665	0.0299	0.037
Finance: Attend/Enroll	226	3	8.682	0.013	0.0469	0.030

When examining X-by-Y plots, we see noticeable differences between roles, particularly between school districts and county offices of education. For example, county offices of education rate Finance: Budget/Interims higher on the governance index and lower on the friction index, whereas school districts rate the same compliance activity lower on the governance index and higher on the friction index. A similar pattern emerges specifically for the LCAP.

Figure A5.1. Governance versus Friction Index Quadrants by LEA Type



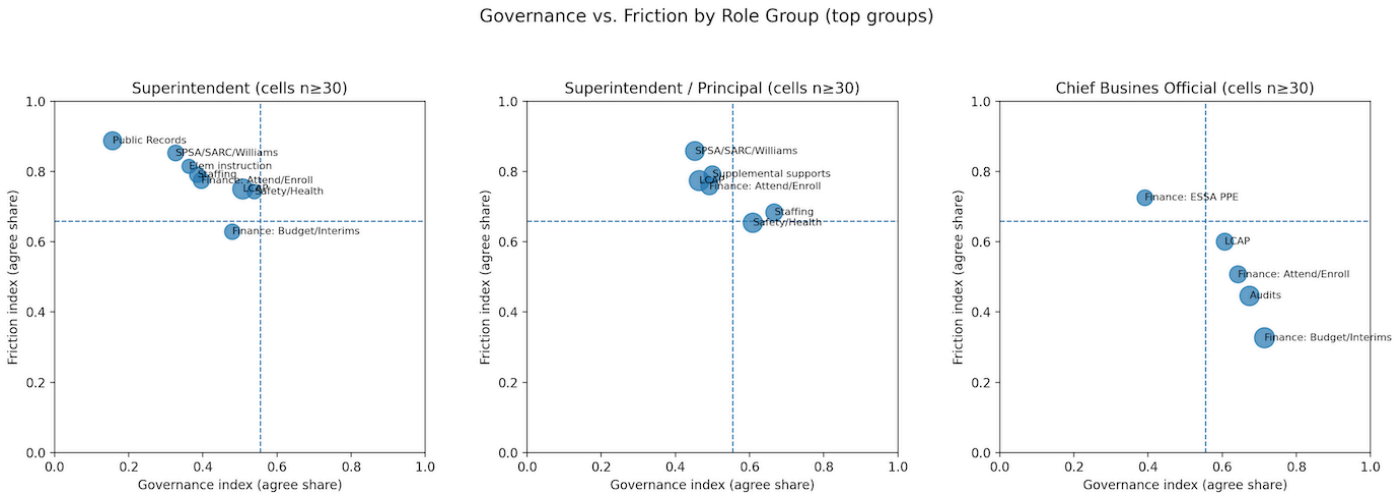
For the role type, we find role differences are the strongest signal: many activities show large, FDR-significant differences in net governance across role groups. Below are the activities with the strongest evidence of role-group differences (p_FDR < 0.05).

Table A5.2. Role Type: Strongest Activity-Level Differences in Net Governance

Compliance Activity	Total *n*	Groups	Kruskal H	*p* value	*p* FDR	Epsilon Squared
Audits	244	7	43.419	9.63e-08	1.73e-06	0.158
LCAP	305	7	38.480	9.05e-07	8.15e-06	0.109
Finance: Attend/Enroll	220	7	37.201	1.61e-06	9.65e-06	0.146
SPSA/SARC/Williams	178	5	27.899	1.31e-05	4.71e-05	0.138
Supplemental supports	211	7	32.982	1.06e-05	4.71e-05	0.132
Staffing	190	6	26.741	6.41e-05	1.92e-04	0.118
Finance: Budget/Interims	216	6	25.203	1.27e-04	3.27e-04	0.096

When examining X-by-Y plots, we see noticeable differences between roles, particularly between superintendents and chief business officials. For example, superintendents rate Finance: Attendance/Enrollment in the upper-left quadrant (higher friction and lower governance), while chief business officials rate it in the lower-right quadrant (lower friction and higher governance). A similar pattern follows for the LCAP and Finance: Budget/Interims.

Figure A5.2. Governance versus Friction Index Quadrants by Role Type



Test indices across other variables

We then estimate activity means by subgroup (enrollment band, LEA type, role group, etc.) and test whether Net governance differs across subgroup categories within each activity. To test whether subgroups differ in their responses, we use rank-based ordinal tests (Mann–Whitney U for 2 groups; Kruskal–Wallis for 3+ groups). As a secondary, highly interpretable check, we collapse responses to Agree vs Disagree and test association using chi-square. For both families of tests, p-values are adjusted using Benjamini–Hochberg FDR within each grouping variable.

Across all construct-by-activity tests that met minimum data requirements, subgroup differences are most consistently detected by role type. Enrollment band differences are comparatively rare.

Table 5A.3. Significance Testing: Governance and Friction Indices on Various Grouping Variables

Grouping variable	Tests Run (#)	Significant (#) (ordinal, FDR<0.05)	Significant (#) (Agree vs Disagree, FDR<0.05)
Enroll Band	136	3	2
LEA Type	144	7	4
Role Type (grouped)	144	86	67

These results describe perceived connections between compliance work and governance goals (equity/accountability/continuous improvement/local control) as well as perceived compliance friction. Agreement on C5–C8 indicates negative impacts (e.g., duplication, distraction), while agreement on C1–C4 indicates positive governance value. Because the matrices are answered only for the activities respondents report spending the most time on, results should be interpreted as perceptions among practitioners who engage with each activity—not as universal ratings across all administrators.

3. Develop initial factor validation using EFA/CFA modeling techniques

Finally, we run EFA and CFA to establish initial factor validation on the eight survey items. The goal of this modeling was to validate whether the eight items separate into two dimensions consistent with the proposed constructs: Governance benefits (C1-C4) and Compliance friction (C5-C8). We ensured sampling adequacy: KMO = 0.904. Bartlett test: chi2(28) = 6954.9, p < 0.001. (EFA rows = 1493, CFA rows = 1491). The figure below shows the Scree plot with parallel analysis for the EFA Sample.

Figure A5.3: Scree plot with parallel analysis (Spearman correlation)

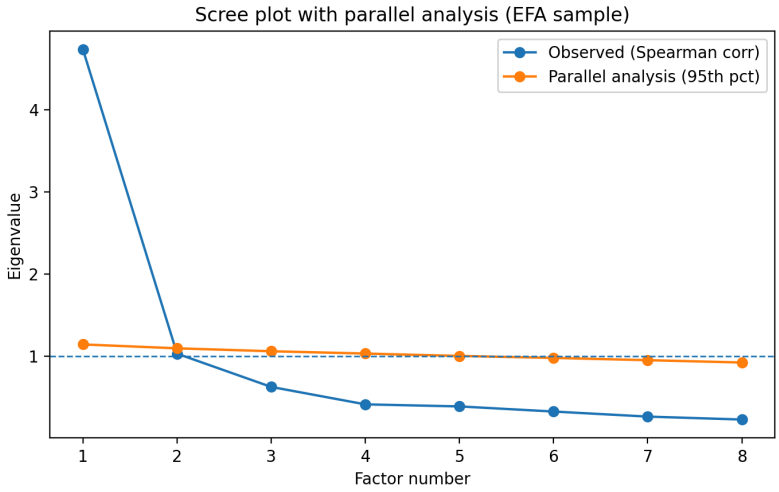


Table A5.4: EFA (2-factor) rotated loadings

Survey Item	Factor 1	Factor 2
C1	1.125	0.022
C2	1.257	0.017
C3	1.299	0.029
C4	1.074	-0.160
C5	0.121	0.903
C6	-0.059	1.321
C7	0.106	1.229
C8	-0.150	1.130

The CFA fit was a 2-factor simple structure, yielding the following results: chi2(19) = 85.4, p = 2.12e-10; CFI = 0.991; TLI = 0.987; RMSEA = 0.048; SRMR = 0.019. Estimated factor correlation (Governance vs. Friction) = -0.684. The figure below shows the standardized loadings for the CFA.

Table A5.5: CFA standardized loadings (2-factor)

Survey Item	Factor	Loading
C1	Governance	0.792
C2	Governance	0.837
C3	Governance	0.892
C4	Governance	0.799
C5	Friction	0.582
C6	Friction	0.887
C7	Friction	0.806
C8	Friction	0.863

We conclude that both the EFA and CFA support a stable two-factor structure in which C1-C4 load on a Governance factor and C5-C8 load on a Friction factor, with a substantial negative correlation between the factors.

5.2 Regression and Hierarchical Linear Models (HLM)

Unit of analysis: respondent-by-compliance activity. Outcomes: overall Value (0–6), overall Burden (0–6), and Net (Value − Burden). Predictors: the 8 Section C agreement items (C1–C8), summarized as Governance index = mean(C1–C4) and Friction index = mean(C5–C8). Models include activity fixed effects and respondent-clustered robust SEs; controls include LEA type, locale group, role function, log2(enrollment), UPC%, overwork hours, and an LAUSD indicator. Composite model takeaway: +1 point on Governance is associated with about +0.53 higher Value (p=5.11e-32); +1 point on Friction is associated with about -0.48 lower Value (p=4.26e-26). For Burden: +1 Governance is associated with about -0.19 lower Burden (p=8.88e-06); +1 Friction is associated with about +0.49 higher Burden (p=4.7e-22). For Net (Value−Burden): +1 Governance is associated with about +0.72 higher Net (p=4.77e-24); +1 Friction is associated with about -0.96 lower Net (p=1.87e-32). LAUSD check: an LAUSD dummy (n≈4 respondents) was included as a sensitivity check; results should be treated cautiously due to the small cluster. Excluding LAUSD does not materially change the Governance/Friction coefficients.

Figure A5.4: Key predictors from composite models, coefficients

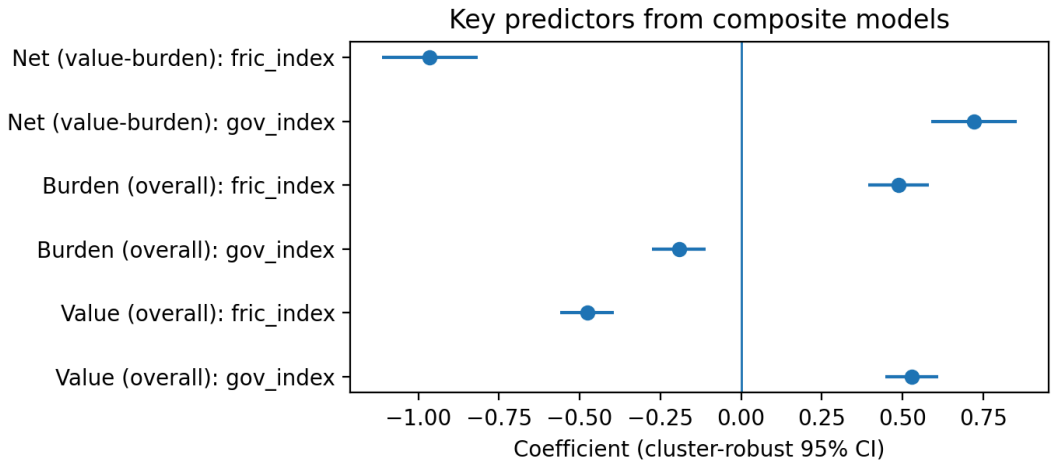
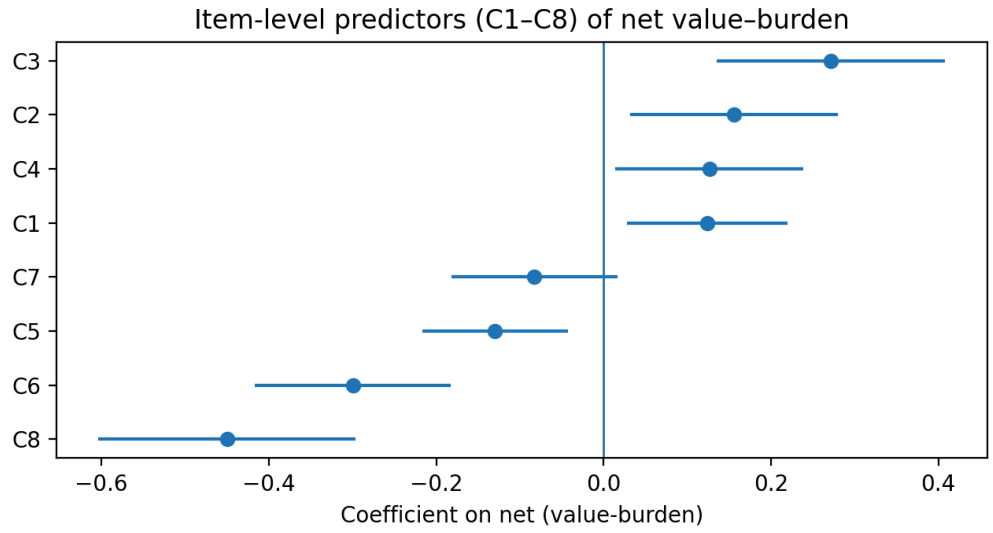


Figure A5.5: Item-level predictors of net value-burden



The analytical sample for the hierarchical linear model was 2,961 respondent-by-activity observations from 548 respondents across 321 LEAs (mean 5.4 activities per respondent). 72.3% of LEAs contribute only one respondent, which limits precision for a pure LEA-random-intercept specification. The key variables included in the model are:

- Burden (0–6) and Value (0–6) per activity (paired). Net value-burden score = Value − Burden (−6 to +6).
- Governance items (C1–C4) and Friction items (C5–C8), coded 1–6 (Strongly disagree → Strongly agree). We use activity-level composites: governance score = mean(C1–C4), friction score = mean(C5–C8), and standardize (z-scores) for modeling.
- Weekly hours per activity from the activity time grid. Because >99% of reported activity-hours are positive in this analytic subset, we model log(hours) vs hurdle model here.
- Respondent/LEA context controls from includerole group, LEA type (District/COE/ Charter/Other), locale (City/Suburb/Town/Rural), DA status group, log2(enrollment), overwork (typical − contracted weekly hours), and UPC% (with mean imputation + missing indicator).

HLM is the lens to use in this instance. Because each respondent rates multiple activities, observations are not independent. A multilevel model with a respondent random intercept explicitly accounts for within-respondent correlation and separates (a) within-person, across-activity variation from (b) between-person differences in overall orientation to compliance. Below is a table showing the variance decomposition of the net value-burden score (value - burden).

Table A5.6: Variance decomposition for net value-burden score (value - burden)

Model	Var(respondent)	Var(residual)	ICC (respondent)	R^2 (marginal)	R^2 (conditional)
VD0: random intercept only	2.632	5.516	0.323	0.000	0.323
VD1: + activity fixed effects	2.817	3.929	0.418	0.182	0.523

In the unconditional model, the respondent ICC is 0.32, meaning about one-third of the variance in net value-burden score lies between respondents (stable orientation) rather than within respondents across activities. After accounting for activity differences, the ICC rises to 0.42 because activity fixed effects reduce within-person residual variance.

When we examine LEA-level clustering on respondents' mean net value-burden score, the LEA ICC is about 0.038 (≈4%). Given that most LEAs have 1–2 respondents, we treat LEA context primarily through fixed predictors (enrollment, LEA type, locale, DA status, etc.) and treat LEA-level random intercepts as a sensitivity check rather than a primary estimand.

We estimate linear mixed-effects models (REML) with a respondent random intercept. Primary models, including activity fixed effects, to compare named compliance streams while controlling for various conditions, including role/LEA context. The primary net value-burden score HLM (composites) is Outcome: net_burden_ij = value_ij − burden_ij for activity i rated by respondent j. Fixed effects include activity indicators, standardized governance and friction composites, and enrollment and role/LEA controls. Random effects were respondent random intercept u_j.

Context controls. Respondent- and LEA-context covariates appended in the updated Excel file are incorporated using the block structure in the HLM prompt: role group; LEA type and locale; enrollment (log2) spline terms; student need/composition indicators; accountability pressure and Differentiated Assistance (DA) indicators; organizational capacity (e.g., schools, staffing ratios); fiscal indicators; mandate/program exposure; and a regional cost-environment control using teacher salary schedule data from the CDE J-90 compilation. Several data-quality indicators are also included (e.g., mean-imputed UPC% with a missing indicator and an LAUSD flag).

Modeling strategy. Primary models are estimated as linear mixed-effects models with activity fixed effects and a respondent random intercept. The activity fixed effects absorb mean differences across compliance streams, while the random intercept accounts for within-respondent correlation due to repeated activity ratings. Net-burden models are estimated using REML. Supporting models for Burden, Value, and log(hours) are estimated in parallel for interpretability.

Blockwise model building and fit artifacts. We estimate the net-burden model in sequential blocks (A–F) and report deviance reductions / likelihood-ratio tests and Nakagawa R^2 (marginal and

conditional). This provides a transparent accounting of the gains from adding LEA structure, need, accountability, capacity, and mandate-stack measures.

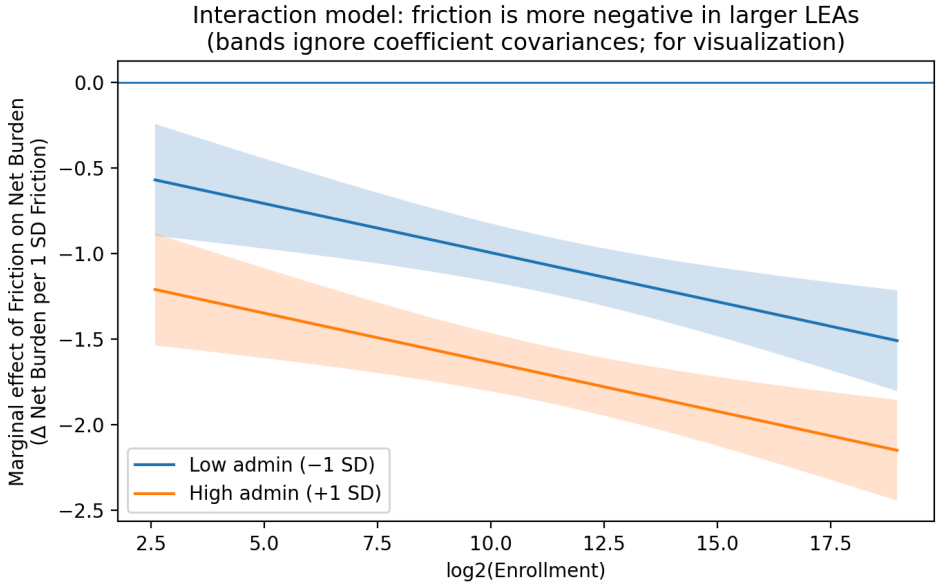
Moderation (interaction) model. We then estimate a model that adds interactions between friction and key capacity/scale measures (administrative staffing per 1,000 and log2 enrollment). These interactions test whether friction's association with net burden differs systematically with LEA size and staffing context.

Item-level robustness/mechanism identification. To identify which governance and friction mechanisms matter most, we estimate a variant in which the two composites are replaced by the eight standardized items entered jointly. Item coefficients are interpreted as the expected change in net burden for a 1 SD increase in that specific perceived mechanism, holding the other items and controls constant.

Valuable vs burdensome time split. For each activity, respondents rate burden and value (0–6). We compute an activity-level 'valuable share' as value/(value + burden) and allocate each activity's reported hours into valuable and burdensome hours. Respondent-level totals are sums across activities. We report descriptive contrasts by enrollment band and by role type.

Enrollment vs role regressions. Using respondent-level outcomes (valuable share, hours-weighted friction, hours-weighted net burden), we estimate OLS models with log2(enrollment) alone and then with role-group controls (Superintendent; Superintendent/Principal; Other). Standard errors are clustered at the LEA level. The figure below shows the marginal effect of friction on net burden as a function of log2(enrollment).

Figure A5.6: Interaction model of friction on net burden against log2(enrollment)



Extended hierarchical models. Using activity-level records (one row per respondent-by-activity with non-missing ratings), we estimate mixed-effects models with respondent random intercepts and activity fixed effects. Baseline covariates include standardized governance and friction composites; extensions add DA status and decoded DA indicators, expense per ADA, and demographics (FRPM%, EL%, foster%, homeless%, migrant%). We test two targeted interactions: friction×expense per ADA for net burden, and FRPM×Supplemental Student Support for log(hours).

DA decoding. DA codes (A–K) are mapped to the set of Dashboard indicator domains implied by each code, then summarized as domain flags at the LEA/respondent level (e.g., any academic trigger).

Demographic-by-activity screening. For each activity and demographic share, we compute Spearman's rank correlation with hours. P-values are adjusted using Benjamini–Hochberg FDR across the full grid of tests.

5.3 Method and Results for Assessing Time Spent from Value and Burden Ratings

Overview

Generally, attitudes expressed on Likert-type items do predict what people do (including the amount of time/effort they invest), but the link is only moderate. It depends on the strength of one's attitude and situational constraints. Several decades of research support the conclusion that attitudes correlate with later behavior at roughly r ≈ .30–.40 on average; when you measure *intentions* (the "I plan to do X" part of the Theory of Planned Behavior), the link is larger—often r ≈ .45–.60—but still far from perfect. Stronger, more critical, and more certain attitudes are better predictors of behavior than weak ones (Kraus, 1990).

"Agree" versus "strongly agree" *can* imply more time/effort—but do not assume equal steps. Response options on a 1–6 Likert item are ordinal (ordered but not evenly spaced). Moving from "agree" to "strongly agree" typically means a higher underlying attitude level and, on average, a higher probability or intensity of related behavior—*especially* when the attitude is essential, and the person feels efficacious—but the size of that jump is not guaranteed to be the same as other one-point jumps. Treat the 1–6 scale as ordinal (or use monotonic effects models) so the data can estimate the magnitude of each step (Sullivan & Artino, 2013).

In the public education context specifically, there is evidence that compliance and paperwork consume a substantial amount of time (for principals, teachers, and central office staff), and studies have shown that educators' beliefs/values shape how they allocate their time (e.g., for test preparation and related practices). Today, no literature provides a definitive, generalizable "per one-unit Likert increase that leads to an *n* hours conversion for compliance tasks. This statewide survey may be a step in that direction (Horng, Klasik, & Loeb, 2009).

Several meta-analyses demonstrate a strong consensus that attitudes predict later behavior change (average r ≈ .38 in a classic synthesis), with stronger predictive power when attitude measures closely match the behavior in both content and elapsed time. Intention, or a person's self-reported plan to act, is an even better predictor of later behavior change than attitude alone (Kraus, 1990). Other, multi-domain meta-analyses demonstrate that attitudes, norms, and perceived control directly contribute to intentions, with effect sizes ranging from moderate to large. Further, stability of intentions over time strengthens the intention-behavior link (McEachan et al., 2016).

The strength of an individual's attitude also matters, which can be measured by the importance, certainty, and accessibility (how quickly an attitude comes to mind), all of which increase behavioral impact; thereby 'strong' attitudes are more stable and more behavior-guiding than "weak" ones (How & Krosnick, 2017). If an education administrator *values* a compliance activity, we should expect (on average) more willingness to invest time/energy in it, all else equal. However, expect exceptions, such as constraints, competing priorities, and burdens, that can mute the translation from attitude to time (Herd, Moynihan, & Widman, 2023).

Continued interest in the issue of compliance may contribute to understanding time investment relative to how much professionals link their intention to action. U.S. federal burden measurement explicitly tracks burden hours (PRA). These frameworks support linking "valued" activities to willingness to bear time costs, but they also show how system design can amplify or dampen these links (Christensen et al., 2017).

Implications for Likert Scale Interpretation

Treat the Likert responses as ordinal predictors. Apply an ordinal regression or monotonic-effects model to estimate the (possibly uneven) effect of moving from 1 to 2 on time or on the probability of spending any time on those compliance activities. This will help avoid the mistake of treating the Likert scale steps as equal (Burkner & Charpentier, 2020). To account for constraints that moderate the attitudinal-to-time link, the analysis can include measures of perceived burden (learning/compliance/psychological costs), role, LEA size, or mandate counts. Hypothesize that the attitude to time slope will be smaller when burdens/constraints are high (Christensen et al., 2019).

The results of this analytical model support the argument that if an education administrator values a compliance activity, they are more likely to devote more time/effort to that activity, on average. However, the magnitude of that increase is an empirical question to be estimated, not a constant of nature. The difference between agree and strongly agree, for example, is unlikely to be zero, nor is the same difference between intervals.

The desired outcome was to allocate weekly hours to each compliance activity (from the time-allocation grid). The predictors in the model were value (0-6) and burden (0-6) treated as ordered steps (>=1, >=2, ..., >=6), plus controls for role, LEA size, and total allocated compliance time.

The core modeling was: (a) a two-part (hurdle) model for a semicontinuous outcome (many zeros, some positive hours) and (b) monotonic (ordered) effects for ordinal predictors (Value/Burden are 0–6). The estimation approach was OLS on log(hours) with respondent-clustered standard errors, and a logistic hurdle (>=1 hour) with respondent-clustered standard errors. A full cross-classified random-effects model (respondent + LEA) was attempted but is not stable for this dataset structure; cluster-robust inference is a standard workaround when most LEAs have only 1-2 respondents.

Model Specifications and Results

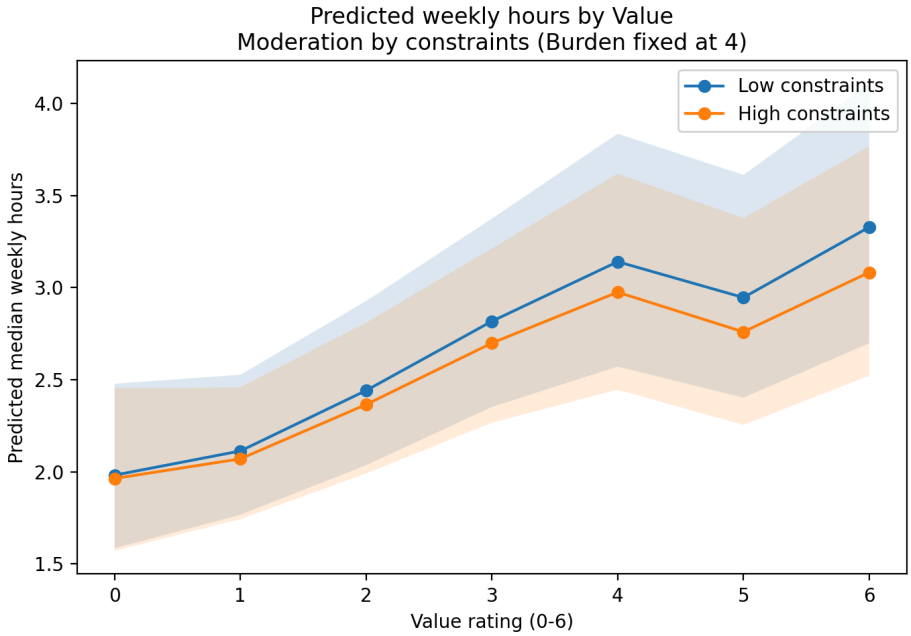
- **Outcome:** Hours per week allocated to each compliance activity (from the time-allocation grid).
- **Predictors:** Value (0-6) and Burden (0-6) treated as ordered steps (>=1, >=2, ..., >=6), plus controls for role, LEA size, and total allocated compliance time.
- **Model form (first-pass):** Two-part hurdle logic: (i) whether the activity gets meaningful time (>=1 hour), then (ii) how much time is allocated when hours>0.
- **Estimation approach:** OLS on log(hours) with respondent-clustered standard errors; a logistic hurdle (>=1 hour) with respondent-clustered standard errors. A full cross-classified random-effects model (respondent + LEA) was attempted but is not stable for this dataset structure; cluster-robust inference is a standard workaround when most LEAs have only 1-2 respondents.

Across activities (marginal predictions, weighted by the observed activity-by-role mix), predicted annual hours rise from about 2.04 hours at value=0 to 3.34 hours at value=6 (a difference of about 1.30 hours/year), holding Burden at a typical level and controlling for total compliance time.

Burden shows a weaker and non-linear association with hours once the value is included. For example, predicted hours dip around burden=3 (~2.22 hours/year) and rise again at the extremes. This pattern usually means Burden is doing "leftover explanatory work" after Value and activity baselines are accounted for, rather than implying that higher burden inherently causes more time.

When constraints are lower (25th percentile of the constraint index), the Value=0->6 difference is about 1.39 hours/year; when constraints are higher (75th percentile), it shrinks to about 1.15 hours/year. That is directionally consistent with the hypothesis that constraints dampen the extent to which attitudes translate into time.

Figure A5.7. Moderation - the value-to-time link is smaller under higher constraints



5.4 Decomposing Time on Value versus Burden-Labeled Activities

Having established how much time an education administrator spends on compliance activities, we try to distinguish which portion of that time is valuable from that which is burdensome. Using a combination of decomposition techniques, we incorporate the amount of reported time by activity, the activity-level paired Value (0-6) and Burden (0-6) ratings used to compute net value-burden score (Value-Burden), the activity time grid (weekly hours per activity) used in the log(hours) HLM. From these data, we construct an hours-weighted decomposition that converts the Value/Burden pair into a share of each hour treated as "valuable" versus "burdensome," then aggregate across activities to the respondent and sample levels.

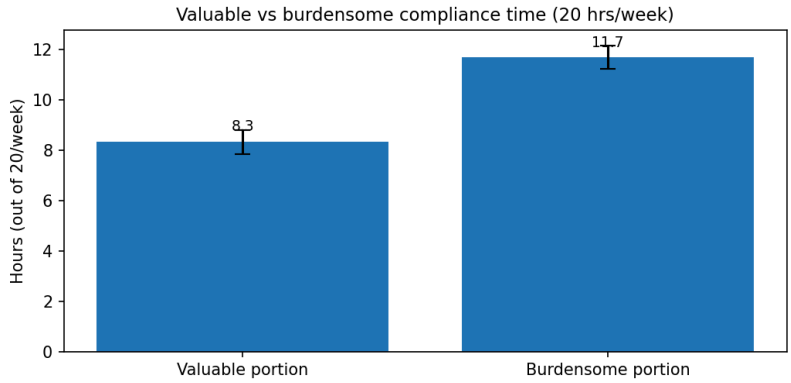
This method uses proportional allocation. For each respondent x activity record, we define:

- Valuable share = Value / (Value + Burden)
- Valuable hours = Hours x Valuable share; Burdensome hours = Hours – Valuable hours

This produces a decomposition that (a) respects the empirical reality that the same compliance activity can be both valuable and burdensome, (b) preserves the 0-6 measurement structure already used in the paper, and (c) yields a directly interpretable statement such as: "Of 20 compliance hours per week, ~8 are 'valuable' and ~12 are 'burdensome'. Robustness checks and tested alternatives include: (1) sign-based allocation (net value-burden score > 0 implies 'valuable' activity; net value-burden score < 0 implies 'burdensome'; split net = 0) and (2) scaled-net allocation: Valuable share = (net value-burden score + 6)/12.

Results of Decomposition. Using the analytic long dataset from the HLM rerun (2,990 activity records; 551 respondents; 321 LEAs), the proportional method implies that roughly 42% of compliance time is experienced as "valuable", and 58% as "burdensome". Scaled to the average 20 hours per week that education administrators spend on compliance, this translates to approximately 8.3 hours per week as 'valuable' and ~11.7 hours as 'burdensome' (bootstrap 95% CI for valuable hours: ~7.8 to ~8.8). The figure below shows a bar chart of this decomposition, including the confidence intervals.

Figure A5.8. Valuable versus Burdensome Compliance Time (20 hours/week)



5.5 Explaining Why Small LEAs Report More Negative Compliance Experience: Isolating the Superintendent Role

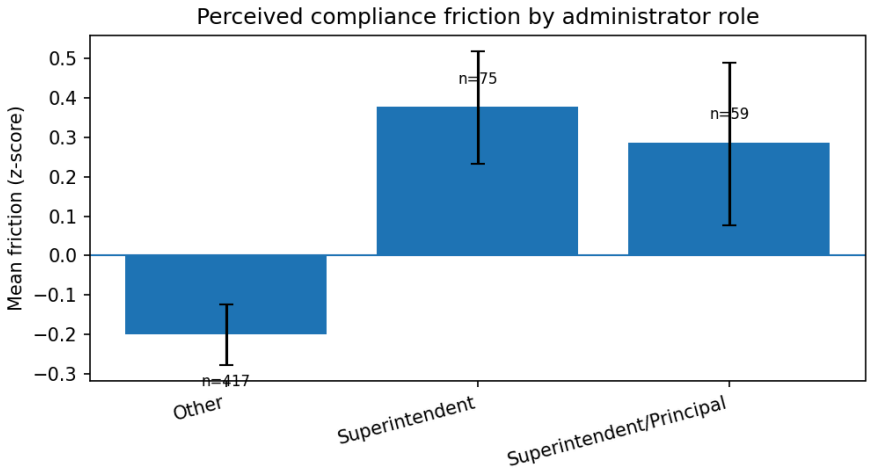
Smaller LEAs do not necessarily report more compliance hours, but they report more negative beliefs and slightly higher perceived friction. One plausible explanation for this is role multiplexing. That is, in small LEAs, the Superintendent is more likely to also be the Principal (and/or to personally shoulder a wider compliance portfolio), which may increase perceived friction and reduce perceived governance/value alignment. To investigate this possible explanation, we use a role-focused mediation design paired with the existing HLM framework. This approach preserved the 'portfolio of activities' logic, uses the same governance/friction composites and net-burden outcome, and offers a concrete organizational explanation (capacity to specialize) that is legible to policy readers.

Results from this analysis show that Superintendent/Principal roles are concentrated in the smallest LEAs, confirming previously documented data from the members' association for school board members, administrators, and school business officials. In the <500 enrollment band, ~33% of respondents are Superintendent/Principal, while in the 10,001+ band, it is 2%.

In respondent-level models, log2 enrollment predicts friction and the valuable-time share, but those enrollment effects largely disappear after controlling for Superintendent role categories. This suggests that role composition is a key pathway linking small LEAs to negative compliance experiences.

Compared to other administrator roles, Superintendents (and Superintendents/Principals) report substantially higher perceived friction and lower governance alignment, and they have a markedly lower 'valuable' share of compliance time (roughly 29-33% versus 44% for other roles). The figure below shows this difference.

Figure A5.9. Perceived Compliance Friction by Administrator Role



Appendix 6. Detailed Statistical Tests and Robustness Checks for Findings

6.1 Statistical Tests on Number of Contracted, Typical, and Time Spent on Compliance Hours Per Week, Including Weighted versus Unweighted Results

Appendix 6.1 uses the subset with non-missing annual compliance-hours estimates (n = 745), whereas the main descriptive table reports the broader weekly compliance measure available for 909 respondents. Wilcoxon signed-rank: $p < 0.001$; sign test: $p < 0.001$)

Administrators report spending an average of approximately 20 hours per week on compliance activities (M=20.2, 95% CI [19.2, 21.1]) in the 2024-25 school year. Relative to typical worked hours (M=51.2), compliance represents approximately 39% of the workweek (95% CI [37%, 41%]).

We report weighted and unweighted descriptive estimates side by side to assess the sensitivity of the paper's descriptive results to post-stratification. The analytic sample includes 909 respondents with completed core items and 745 respondents with non-missing annual compliance-hours estimates.

Primary weighted estimates use trimmed raking weights anchored to directly observed statewide LEA-type and locale margins from the sampling frame. Under this specification, the weighted mean annual compliance estimate is 20.15 hours per week, compared with 20.18 hours unweighted. Using the statewide administrator count of 7,569, these estimates imply approximately 152,540 weighted versus 152,772 unweighted compliance hours per week statewide. The figure below provides the weighted and unweighted results.

Table A6.1. Overall weekly hours and compliance share, weighted and unweighted

Outcome	N	Unweighted mean (95% CI)	Unweighted median [IQR]	Weighted mean (95% CI)	Weighted median [IQR]
Contracted hours/week	909	40.3 [39.9, 40.8]	40.0 [40.0, 40.0]	40.1 [39.4, 40.8]	40.0 [40.0, 40.0]
Worked hours/week	909	51.4 [50.8, 52.0]	50.0 [45.0, 60.0]	51.3 [50.3, 52.3]	50.0 [45.0, 60.0]
Compliance hours/week	745	20.2 [19.2, 21.1]	20.0 [10.0, 29.0]	20.2 [18.6, 21.7]	20.0 [10.0, 25.0]
Compliance share of worked time	745	39.8% [37.9, 41.7]	33.3% [20.0, 52.1]	39.8% [36.7, 43.0]	33.3% [20.0, 50.0]

Notes: 95% confidence intervals are shown in brackets after the mean. IQR is reported as Q1 and Q3 in brackets after the median. Weighted estimates use the primary LEA-type + locale rake.

As an additional check, a role-inclusive rake that uses the proxy role totals in the draft raises the weighted mean only modestly to 20.44 hours per week (weighted compliance share 41.0%). The figure below, therefore focus on the more conservative direct-margin weights.

Table A6.2. Activity-level weekly time allocation among respondents reporting any time on the activity

Activity	N	Unweighted mean hrs (95% CI)	Weighted mean hrs (95% CI)	Unweighted share of allocated hours	Weighted share of allocated hours
Special education	204	7.5 [6.2, 8.8]	8.5 [6.4, 10.5]	9.4%	16.2%
Finance: budget/interims	278	6.6 [5.6, 7.6]	5.3 [4.0, 6.5]	11.2%	9.2%
LCAP	374	5.1 [4.4, 5.9]	4.0 [3.1, 4.9]	11.6%	9.1%
Finance: attendance/enroll	284	4.0 [3.4, 4.7]	3.7 [2.9, 4.6]	7.0%	8.2%
Human resources / staffing	249	4.2 [3.4, 4.9]	3.9 [2.7, 5.2]	6.3%	8.0%
Audits	296	3.9 [3.4, 4.5]	3.6 [2.8, 4.3]	7.1%	7.4%
Other	128	10.5 [8.6, 12.4]	7.6 [4.8, 10.5]	8.2%	5.7%
Supplemental student support	260	4.4 [3.6, 5.1]	3.2 [2.3, 4.1]	6.9%	5.5%
High school / CCR	164	3.4 [2.9, 4.0]	3.7 [2.8, 4.6]	3.4%	5.4%
Instructional minutes/time	139	2.6 [2.0, 3.2]	3.2 [1.9, 4.5]	2.2%	4.2%
SPSA/SARC/Williams	232	3.7 [2.8, 4.5]	2.9 [1.8, 4.0]	5.2%	4.1%
Public records / transparency	256	3.5 [2.8, 4.3]	2.5 [1.5, 3.5]	5.5%	3.3%
Student safety and health	174	3.0 [2.4, 3.7]	2.4 [1.4, 3.3]	3.2%	3.3%
Finance: transpor/nutrition	129	4.1 [3.1, 5.1]	3.5 [2.2, 4.9]	3.2%	2.6%
Elementary instruction	153	3.1 [2.5, 3.8]	2.6 [1.9, 3.4]	2.9%	2.6%
Finance: federal reporting	143	3.4 [2.7, 4.1]	2.5 [1.5, 3.5]	3.0%	2.1%
Finance: independent study	85	1.8 [1.4, 2.2]	2.0 [1.3, 2.7]	0.9%	1.7%
Alternative schools	58	3.7 [2.6, 4.8]	2.9 [1.0, 4.7]	1.3%	0.8%
Middle school instruction	46	2.5 [1.8, 3.3]	1.6 [0.5, 2.6]	0.7%	0.4%
Adult education / WIOA	29	3.0 [1.4, 4.6]	2.4 [-0.8, 5.7]	0.5%	0.3%

Notes: Activity means are computed only among respondents who reported positive hours on that activity. Shares use allocated activity hours across all respondents with activity-hour data and therefore summarizes how total reported compliance time is distributed across activities.

The Tables below present the role-inclusive result is noted as a supplementary sensitivity check.

Table A6.3. Annual compliance hours per week by administrator role

Role	N	Unweighted mean (95% CI)	Unweighted median [IQR]	Weighted mean (95% CI)	Weighted median [IQR]
Superintendent	184	17.1 [15.3, 19.0]	15.0 [8.0, 20.0]	16.1 [13.7, 18.6]	15.0 [10.0, 20.0]
Chief Business Official	75	22.5 [19.1, 25.9]	20.0 [10.0, 30.0]	23.0 [18.2, 27.9]	20.0 [13.1, 30.0]
Deputy/Assoc/Asst Supt	129	18.6 [16.4, 20.8]	15.0 [10.0, 25.0]	18.9 [15.6, 22.2]	15.0 [10.0, 25.0]
Director	200	21.2 [19.4, 22.9]	20.0 [10.0, 30.0]	21.8 [18.8, 24.7]	20.0 [10.0, 30.0]
Manager	81	22.5 [20.1, 25.0]	20.0 [15.0, 30.0]	23.6 [18.6, 28.5]	20.0 [12.0, 30.5]
Administrator	33	23.2 [17.2, 29.1]	20.0 [10.0, 30.0]	24.1 [13.8, 34.3]	15.0 [10.0, 34.9]
Coordinator	25	25.9 [20.5, 31.3]	25.0 [20.0, 35.0]	22.2 [12.2, 32.3]	20.0 [19.2, 30.0]
Executive Assistant	18	18.0 [13.0, 23.0]	17.5 [10.0, 25.8]	15.9 [5.7, 26.2]	18.1 [2.0, 25.5]

Notes: Means are calculated among respondents with non-missing annual compliance-hours estimates in each role group.

Table A6.4. Annual compliance hours per week by enrollment band

Enrollment band	n	Unweighted mean (95% CI)	Unweighted median [IQR]	Weighted mean (95% CI)	Weighted median [IQR]
<500	141	19.3 [17.1, 21.5]	16.0 [10.0, 25.0]	19.2 [15.7, 22.8]	15.0 [10.0, 25.0]
500-1,000	84	21.5 [18.5, 24.5]	20.0 [10.0, 30.0]	21.0 [17.1, 25.0]	20.0 [13.7, 22.1]
1,001–2,500	113	21.1 [18.7, 23.5]	20.0 [10.0, 30.0]	20.0 [16.5, 23.5]	20.0 [10.0, 25.0]
2,501-5000	118	20.8 [18.5, 23.2]	20.0 [10.0, 28.8]	20.7 [16.6, 24.8]	20.0 [10.0, 29.3]
5,001-10,000	119	18.0 [15.8, 20.2]	15.0 [8.0, 25.0]	18.2 [14.7, 21.6]	15.0 [10.0, 28.2]
10,001+	170	20.7 [18.6, 22.8]	20.0 [10.0, 30.0]	22.2 [19.5, 24.9]	20.0 [10.0, 30.0]

6.2 Translating Sample Estimates to Population-Level Estimates

We conducted various tests to meet the conditions necessary to make population-level estimates, not just sample estimates. These included tests for sample size and precision, post-stratification to population margins, and comparisons of unweighted to weighted estimates. The results are below.

From the raw survey file (N = 905), respondents had both contracted and typical work hours. Worked > Contracted hours in 88% of circumstances. These assess sample size and precision. All test the null hypothesis that the typical difference is 0.

1. Paired t-test (mean difference): $t(904) = 32.14$, $p = 9.0 \times 10^{-152}$. Mean working hours exceed contracted hours.
2. Wilcoxon signed-rank test (ordinal/robust): $W = 6{,}238.5$, $p = 7.5 \times 10^{-125}$. The typical difference between contracted and worked hours is positive and robust.
3. Sign test (direction only; ignores magnitude): Positives = 796, Negative = 8 (ties excluded): $p = 7.9 \times 10^{-224}$. Far more respondents report “Worked > Contracted” than the reverse.

4. Effect size (magnitude): Cohen's $d_z \approx 1.07$ (large, paired effect)

Robustness and data quality checks were also conducted. There are a handful of extreme or possibly miscoded values (e.g., a contract-hours value of 220). Even when restricted to a plausible weekly range (Contracted 20–60, Worked 20–100), the conclusion is unchanged: mean difference = +11.44 hours/week, paired t-test: $p \approx 2.5 \times 10^{-246}$, Wilcoxon: $p \approx 7.2 \times 10^{-132}$, and sign test: $p \approx 6.1 \times 10^{-236}$.

The figure below shows significance tests and robustness checks looking at contracted versus worked hours per week by role group, LEA type, and enrollment band. These results affirm the sample's ability to make population-level estimates.

Table A6.5. Contracted versus Worked Hours Per Week: Descriptive Statistics, Statistical Significance Tests, and Robustness Checks

Group	Level	N (pairs)	Contracted hrs/wk (mean)	Worked hrs/wk (mean)	Gap (Worked-Contract) mean	Gap mean 95% CI low	Gap mean 95% CI high	Paired t stat	Paired t p	Wilcoxon p	Sign test p
Overall	All respondents	905	40.3	51.4	11.0	10.4	11.7	32.142	8.99E-152	7.54E-125	7.92E-224
Role group	Superintendent	115	40.7	56.7	16.1	14.2	17.9	17.272	1.31E-33	3.19E-19	4.35E-32
Role group	Superintendent / Principal	95	42.3	54.9	12.6	8.6	16.6	6.212	1.42E-08	9.29E-16	3.76E-26
Role group	Chief Busines Official	92	39.1	49.3	10.2	8.6	11.8	12.613	1.10E-21	1.62E-14	4.45E-24
Role group	Deputy/Assoc/Asst Supt Business	81	40.2	54.5	14.3	13.0	15.6	21.380	8.03E-35	3.18E-15	8.27E-25
Role group	Director, Fiscal Services	53	40.0	49.6	9.6	7.1	12.1	7.582	5.86E-10	3.09E-10	6.82E-13
Role group	Deputy/Assoc/Asst Supt Instruction	50	40.6	54.5	13.9	12.2	15.7	15.987	4.47E-21	1.42E-14	1.42E-14
Role group	Director, Special Education/SELPA	50	40.3	48.7	8.4	5.7	11.0	6.368	6.31E-08	9.58E-10	2.61E-12
Role group	Other roles (n<30)	369	40.1	48.8	8.7	7.9	9.5	21.450	8.63E-67	4.29E-47	1.34E-82
LEA type	School District	649	40.5	52.1	11.7	10.8	12.5	27.371	3.33E-110	6.42E-94	9.51E-168
LEA type	County Office of Education	122	40.1	48.2	8.2	6.7	9.6	11.065	4.34E-20	3.44E-15	2.30E-25
LEA type	Charter School	111	39.9	50.9	11.0	9.2	12.8	12.237	2.97E-22	4.80E-16	9.59E-27
LEA type	Other types (n<30)	23	40.8	49.7	8.9	6.2	11.7	6.740	8.96E-07	1.91E-06	1.91E-06
Enrollment band	<500	165	40.6	49.5	8.9	6.3	11.5	6.865	1.30E-10	1.50E-20	3.08E-36
Enrollment band	501-1000	99	40.8	49.2	8.5	6.7	10.2	9.686	5.83E-16	3.79E-13	1.03E-21
Enrollment band	1001-2500	138	40.0	53.0	13.0	11.7	14.3	19.940	2.47E-42	1.03E-22	2.35E-38
Enrollment band	2501-5000	146	40.5	51.2	10.7	9.4	12.0	16.456	5.52E-35	2.51E-21	3.22E-36
Enrollment band	5001-10000	147	39.8	52.2	12.4	10.9	13.9	16.070	4.23E-34	1.98E-22	4.89E-38
Enrollment band	10001+	210	40.5	52.3	11.9	10.9	12.9	23.337	4.03E-60	5.08E-34	7.97E-59

Notes: Consent filter: Disclosure Accept = Yes; paired analysis requires both Contracted hours (A6_1) and Typical worked hours (A6_2).

Gap = Worked − Contracted (hours/week).

Tests per row: paired t-test, Wilcoxon signed-rank (drops ties), and sign test (direction only; ignores ties).

Restricted (robustness) sample keeps Contracted hours in [20,60] and Worked hours in [20,100].

Omnibus rows test whether the overwork gap differs across groups using Kruskal–Wallis (nonparametric).

We conduct additional significance tests to support population-level statements about the overwork gap (worked hours - contracted hours) and the number of hours spent on compliance activities. The figure below provides the results of the unweighted and weighted tests.

Table A6.6. Contracted versus Worked Hours Per Week, Unweighted and Weighted Test

Measure	Unweighted Mean	Weighted Mean	95% CI (weighted)
Contracted hours	40.34	40.21	[39.7, 40.7]
Worked hours	51.37	51.15	[50.4, 51.9]
Overwork gap	+11.03	+10.94	[+10.1, +11.8]
% above contract	26.9%	27.2%	[25.3%, 29.0%]

The figure below provides the results of the unweighted and weighted tests on the number of compliance hours worked per week.

Table A6.7. Compliance Hours Worked Per Week, Unweighted and Weighted Test

Measure	Unweighted	Weighted	95% CI (weighted)
Compliance hours/week	20.16	20.41	[19.3, 21.5]
Worked hours/week (same respondents)	51.88	51.42	[50.5, 52.3]
Share of worked time	38.9%	39.7%	[37.8%, 41.5%]

All weighted paired tests came back significant. The paired t-test (cluster-robust) was $p < 1\times10^{-120}$, the Wilcoxon signed-rank was $p < 1\times10^{-100}$, and the sign test showed >99% of non-ties worked more than contracted. Therefore, weighting to the statewide LEA population confirms the overwork gap.

These analyses affirm that three conditions were met to make population-level statements based on the sample estimates. They include: (1) sample size and precision where n≈900 yields ±1 hour precision on weekly means, (2) post-stratification to population margins were adjusted for systematic over-/under-representation by LEA size, type, and locale using administrator counts–not just LEA counts, and (3) stability check showed weighted and unweighted estimates differ by ≤0.3 hours—a sign that results are not driven by sample imbalance.

6.3 Education Administrators' Approach to Rules and Regulations

The survey also asked respondents to choose a statement that best described their approach to rules and regulations in public education, effectively how they operationalize and navigate compliance activities in their roles. The offered responses included:

- Flexible Application – I adhere to rules but exercise discretion when adapting them to unique situations or challenges.
- Innovation Within Boundaries – I respect rules but look for creative ways to achieve objectives while staying within regulatory limits.
- Strict Compliance – I follow rules and regulations meticulously and expect the same from my team to ensure consistency and accountability.
- Pragmatic Balance – I weigh the importance of rules against practical outcomes, bending them only when necessary for the greater good.
- Rule Challenger – I critically evaluate rules and advocate for changes when they hinder efficiency, fairness, or innovation.
- Rules as Guidelines – I view rules as a framework to guide decision-making but prioritize context and the needs of stakeholders over rigid adherence.

Among respondents, attitudes toward rule adaptation appear remarkably consistent across role types. The figure below shows counts by education administrator role and reported approach to compliance.

Table A6.8. Count of Education Administrators by Reported Approach to Compliance

	Flex App	Inn w/ Bound	Pragmatic	Rule Challenge	Rules as Guide	Strict Comp	TOTAL
Education Administrator Role							
Superintendent	66	81	18	6	4	36	**211**
Chief Business Officer	124	102	8	4	3	98	**339**
Curriculum, Instruction, Assessment	34	44	1	0	0	18	**97**
State & Federal Programs / LCAP	11	15	1	0	0	11	**38**
Tech, Info Services, and CALPADS	13	8	1	0	0	14	**36**
Exec Asst. / Board Clerk	12	4	1	0	0	7	**24**
Human Resources	26	6	2	0	1	24	**59**
Special Education/504/SELPA/Health	44	21	3	2	2	33	**105**
TOTAL	**330**	**281**	**35**	**12**	**10**	**241**	**909**

When analyzing the independence between the administrator role and rule-adaptation orientation (selection of one of the six approaches listed in the survey), the chi-square test was significant ($p = 0.0047$, $df = 32$, $p < 0.05$). The association was negligible, though (Cramér's $V = 0.0229$), indicating that approaches to compliance and rule adaptation are statistically similar across administrator positions.[7]

6.4 Estimated Costs of Compliance for Education Administrators

We estimate the annual compensation cost of compliance time by combining survey-reported compliance hours with compensation derived from reported salaries plus a 38 percent benefits load. At the respondent level, annual compliance cost is calculated as annual salary × 1.38 × min(compliance hours per week ÷ typical work hours per week, 1.0), which caps implausible responses at 100 percent of the work week. The preferred estimate uses complete cases on annual compliance hours and then scales the resulting mean to the study population of 7,569 California education administrators.

Under that specification, the direct compensation cost of compliance time for the study population is approximately $712 million annually, with a 95 percent bootstrap confidence interval of $673 million to $751 million. This is equivalent to about $94,005 per administrator per year. Relative to the earlier salary-only estimate, the benefits adjustment raises each respondent-level and population-level estimate by the same 38 percent.

To extend the estimate statewide, we add two additional staff groups: 23,000 administrative support staff and a direct benchmark of 16,859 California principals and assistant principals. Because the survey was fielded primarily to administrators rather than to support staff, the support-staff extension is presented as a range of scenarios. The lower-bound scenario uses a narrow proxy based only on executive assistant and board clerk respondents; the upper-bound scenario uses a broader proxy based on manager, coordinator, and executive assistant respondents. The principal and assistant principal extension uses the direct NCES benchmark count.

This produces a preferred statewide compensation range of $2.73 billion to $3.56 billion annually. In the lower-bound scenario, study administrators account for $712 million, support staff for $1.00 billion, and principals/assistant principals for $1.01 billion. In the upper-bound scenario, the administrator and principal/assistant principal subtotals remain unchanged, while the support staff subtotal rises to $1.84 billion. These figures should be read as estimates of direct compensation cost only. They do not include contracted services, opportunity costs, foregone instructional or managerial activity, or psychological burdens such as stress and burnout. The figure below summarizes these estimates and assumptions.

[7] In social science research, reading Cramer's V results range from 0 (no association) to 1 (perfect association). The typical thresholds are ~0.10 small effect, ~0.30 medium effect, and ~0.50 large effectbased the annual compliance cost is calculated as annual salary × 1.38 × min(compliance hours per week ÷ typical work hours per week, 1.0), which caps implausible responses at 100 percent of the workweekon reported salaries,.

Table A6.9. Preferred complete-case estimate with benefits

Staff level	Sample n	Salary-only mean	Mean incl. benefits	Population	Statewide subtotal
Study administrators	535	$68,119	$94,005	7569	$711,521,123
Support staff (lower / narrow proxy)	18	$31,618	$43,633	23000	$1,003,548,396
Support staff (upper/broad proxy)	123	$57,825	$79,798	23000	$1,835,364,962
Principals / assistant principals	85	$43,623	$60,200	16859	$1,014,911,223

/nterpretation: the preferred high/low range in rows 19–20 fixes the study-administrator subtotal and the direct principal/AP count. The range comes from using a narrow versus broad administrative-support proxy. Rows 25–26 are a floor sensitivity, not the preferred estimate.

Table A6.10. Recommended high/low statewide totals (direct principal/AP count)

Scenario	Admin subtotal	Support subtotal	Principal/AP subtotal	Grand total
Lower bound (narrow support proxy)	$711,521,123	$1,003,548,396	$1,014,911,223	**$2,729,980,742**
Upper bound (broad support proxy)	$711,521,123	$1,835,364,962	$1,014,911,223	**$3,561,797,308**

Table A6.11. Lower-bound sensitivity: missing annual compliance hours set to zero

Scenario	Admin subtotal	Support subtotal	Principal/AP subtotal	Grand total
Lower bound	$596,651,726	$752,661,297	$908,078,463	**$2,257,391,485**
Upper bound	$596,651,726	$1,312,499,362	$908,078,463	**$2,817,229,551**

Lower bound: treated skipped annual compliance-hours responses as zero. Upper bound: same zero-hour assumption, broad support proxy. Interpretation: the preferred high/low range in rows 19–20 fixes the study-administrator subtotal and the direct principal/AP count. The range comes from using a narrow versus a broad administrative-support proxy. Rows 25–26 are a floor sensitivity, not the preferred estimate.

As a floor sensitivity, treating skipped annual compliance-hour responses as zero lowers the direct administrator subtotal to about $597 million and the statewide range to about $2.26 billion to $2.82 billion. Because skipped responses are unlikely to indicate no compliance work, that sensitivity is better interpreted as a lower-bound check rather than the preferred specification.

6.5 Net Burden Calculation and Statistical Tests for Significant Differences

A paired t-test was used because the same respondents are assessing two different conditions (value and burden). To avoid leaving this statistical result unexamined, the Wilcoxon signed-rank test, sign

test, and Spearman correlation are also conducted for robustness. If all of these statistics point in the same direction, then the original conclusion (paired t-test) is sturdy.

Throughout this analysis, *net value-burden score = value – burden*. Meaning a negative = burden > value. For each compliance activity, respondents rated both perceived value (contribution to equity, accountability, continuous improvement) and perceived burden (learning, compliance, psychological, and opportunity costs) on 7-point scales. We computed the "net value-burden score" as value minus burden, with negative values indicating that burden exceeds value. net value-burden score ranges from −6 to +6. Of the total compliance activities, all but one, i.e., Adult Education: WIOA, apprenticeships, did not have sufficient responses (n>30) to be included in the analysis.

Overall, the burden of these compliance activities exceeds their value. Of the 19 reported activities, 15 have a negative mean net value-burden score (Value – Burden < 0), and 14 are statistically significant (FDR ≤ 0.05) in both paired t-tests and Wilcoxon tests. The median Spearman correlation between value and burden ratings within activities is ρ = -0.38, indicating that respondents who perceive an activity as more burdensome also tend to perceive it as less valuable.

Among these activities, the three “biggest net value-burden score” and pain-monsters at the top of the chart are shown in the figure below.

Table A6.12. Compliance Activities with the Biggest “Net Value-Burden Score”

Compliance Activity	Sample Size (# of Pairs)	Net Value-Burden Score Mean (*95% CI High - Low*)	Non-ties Percent Burden > Value	FDR p-values: t-test	FDR p-values: Wilcoxon
Public Records Request / Transparency reporting	209	– 4.37 *(– 4.66 to – 4.08)*	96%	~ 1.3e–75	~ 2.2e–32
Finance: ESSA per pupil / federal spending reporting	117	– 2.79 *(– 3.26 to – 2.33)*	90%	~ 3.5e–21	~2.3e–14
SPSAs / SARCs / Williams compliance	192	– 2.12	80%		

Only one activity is clearly net-positive and significant after FDR: High School Instruction/College & Career Readiness (pairs, n=135). net value-burden score is +0.76. Both the t-test and the Wilcoxon test were significant (p-values of 0.001 and 0.001, respectively).

Across the compliance activities, Spearman ρ is negative for every activity (median approximately – 0.38 (range – 0.58 to – 0.13). Within an activity, respondents who rate it as burdensome also tend to rate it as less valuable (and vice versa). This relationship is not perfect, but it reliably points in that direction. The graphic below shows the mean net value-burden score for all compliance activities, along with their confidence intervals.

Appendix 7. Education Administrator Survey

A. Basic Information and Demographics to Support Time & Effort Estimates (4 questions)

This first section poses a series of questions about your current role in public education. These questions are essential to the research study, as they enable researchers to answer questions about the amount of time education administrators spend on compliance activities, as well as to estimate the cost of performing those activities. Note that the research results will only be reported in the aggregate.

1. What LEA do you currently work in?
    a. Select the county, then select LEA (tie this to LEA ID from public file)
    b. If your LEA is not in this list, please click 'Other' and write in your LEA.

2. Which best describes your current role?
    a. Superintendent, Deputy/Assistant Superintendent, Charter Direct/CEO, Chief Business Official, Director (e.g., C&I, Federal/State Programs), COE Administrator, Other

3. This next question supports the research study, enabling researchers to estimate the amount of resources allocated to compliance activities. What dollar range most closely matches your current salary [note this should not include health and welfare benefits or other compensation, e.g., OPEB contributions, etc.]
    a. Increments of $5,000 [starting at $50,000 to $300,000

4. What is the number of hours you are contracted to work versus what you work on average per week in your current position?
    a. Enter number of contracted hours (max 60)
    b. Enter average number of working hours per week (max 70)

B. Time Use on Compliance Activities (3 questions)

The following section will ask about the compliance activities you have participated in over the last several weeks (1-2). Before we address those questions, we will review some essential and basic definitions to guide your responses. Below are several terms defined in the context of this study:

- State law - Includes all laws, decisions, rules, regulations, or other State actions having the effect of law of any State. In California's context, this is the Education Code and other codes applicable to LEAs.

- State regulation - A rule or standard, enacted by a state government agency, has the force of law within that state's jurisdiction, often implementing or interpreting a state statute. In California, this is typically a memo or guidance issued by a state agency to LEAs.
- Compliance - In the context of California school districts, compliance refers to adhering to and following all applicable federal and state laws, regulations, and policies related to education. Compliance ensures that school districts operate in a way that meets the legal and regulatory requirements set by the California Department of Education (CDE) and other relevant agencies.

In this segment, you will answer questions about your work on compliance activities. To see a complete list of the categories, click here.

- Think back over the ***last two weeks*** about the activities and tasks that you were engaged in. What amount of time (in hours) per week would you estimate in total that you spent on compliance activities linked and listed above?
    a. Enter the number of hours. (Not to exceed the number of average hours per week)

- Think back over the ***prior school year (2024-25)*** about the activities and tasks that you were engaged in. What proportion of your time would you estimate in total that you spent on compliance activities listed above?
    a. Slider from 0-100%

- In the previous question, you said that you spent x% of your time or y hours on compliance activities. Now, based on the **proportion of compliance *over the last year (number of hours),*** identify all the compliance categories that you worked on in this time. Note that there are examples of compliance activities for each of the categories below; however, these are not inclusive of all possible activities. Then, allocate that amount to the compliance categories listed below.
    a. Adult Education: WIOA, apprenticeships
    b. Other schools: Dashboard alternative school status, juvenile court schools
    c. Audits: Completing annual audits aligned to the K–12 LEA Annual Audit Guide
    d. Elementary Instruction: K-3 grade span adjustment, TK, Kinder Continuance, RII grant, Universal Pre-K reports
    e. High School Instruction / College & Career Readiness: Community College, A-G
    f. Instruction: Minutes, Time
    g. Local Control Accountability Plan (LCAP)
    h. Middle School Instruction: TUPE or similar programs
    i. Special Education: Data entry, IDEA reporting, infant funding, out-of-home care
    j. Student Safety and Health: Comprehensive school safety plan, immunizations
    k. SPSAs, SARCs, and/or Williams compliance

l. Supplemental Student Support: community schools, ELOP, ASES, Prop 28, foster youth, migrant ed, CARS
m. Teachers and Classified Staffing: certification, misassignment, early retirement, educator effectiveness
n. Finance: Attendance, ADA, Enrollment, LCFF pupil counts, CALPADS, CBEDS
o. Finance: Adoption Budget, Interims, Actuals, EPA, Gann limit, Apportionments
p. Finance: ESSA per pupil expenditure reporting, other federal spending reporting
q. Finance: Home to school transportation, nutrition, and other financial reporting
r. Finance: Independent Study
s. Public Records Requests
t. Other category [fill in]

C. Perceived Value of Compliance (4 questions)

Based on your previous responses to the following questions, for the compliance activities in which you spent the most time over the last year. For each of those activities, answer the following questions.

1. For each compliance activity, answer the following: (7-point Likert scale: 0 - no response, 1 - strongly disagree, disagree, neutral, agree, and 6 - strongly agree)
    a. [Compliance activity 1] *ensures higher degrees of equity* by raising awareness of different student needs.
    b. [Compliance activity 1] *holds staff accountable for outcomes* in a manner that improves their practice and future use of resources.
    c. [Compliance activity 1] *supports continuous improvement* by generating data that can be used to adjust practice promptly.
    d. [Compliance activity 1] *preserves local control,* allowing education administrators and the community to make context-specific choices

2. For each compliance activity and its associated tasks, answer the following: (7-point Likert scale: 0 - no response, 1 - strongly disagree, disagree, neutral, agree, and 6 - strongly agree)
    a. [Compliance activity 1] *is duplicative of other tasks,* making it redundant and an inefficient process.
    b. [Compliance activity 1] *distracts from student-focused priorities* and therefore diminishes time available to focus on students.
    c. [Compliance activity 1] *decreases engagement with the community and staff* and therefore distracts from authentic relationship-building.
    d. [Compliance activity 1] *takes away time to focus on better resource choices* by having time to plan, design, and implement with quality.

3. In your context, [Compliance activity 1] is … (assessing overall value versus burden; semantic differential; 7-point slider; defining the tipping point)

0 - highly burdensome	0 - highly invaluable
1 - more burdensome	1 - more invaluable
2 - slightly more burdensome	2 - slightly more valuable
3 - neutral	3 - neutral
4 - slightly more burdensome	4 - slightly more valuable
5 - more burdensome	5 - more valuable
6 - highly non-burdensome	6 - highly valuable

- When [Compliance activity 1] becomes burdensome, what contributes most? (drivers of burden; multi-selection)
    a. Duplication across multiple plans/processes (“redundancy”)
    b. Prescriptive process that limits local choice (“controlling the process”)
    c. Added requirements without removing older ones (“add, add, add”)
    d. Requirements tightened due to isolated non-compliance (“bad actor” effect)
    e. Educational partner engagement exceed local capacity (“under-resourced”)
    f. Data elements not used for decisions (“performative”)
    g. Timing misaligned with budgeting/Board cycles (“misalignment with decisions”)
    h. Technology/data system limitations (“data limitations”)
    i. Other (specify)

D. Components of the Local Control Funding Formula (4 questions)

These questions specifically ask about the LCFF and its associated components.

1. Please identify the first LCAP to which you substantially contributed. [Dropdown of years: 2014-15 to 2025-26] If you did not work on an LCAP mark None.

2. Given your experience with the LCAP, has it become ‘unmanageably big’ in your context?
    a. 1 agree
    b. 7 disagree

3. The LCAP is a guiding document for the LEA that substantially influences student outcomes.
    a. 1 agree
    b. 7 disagree

4. LCAP engagement requirements produce meaningful insights we actively use in planning and adjusting future strategy and resource use?
    a. 1 agree
    b. 7 disagree

5. The Dashboard provides us with timely and meaningful insights into student and school performance, initiating actionable changes for the upcoming school year.
    a. 1 agree
    b. 7 disagree

6. [If identified for DA] Did the process of DA help us to focus on systematic challenges that our LEA has faced?
    a. 1 agree
    b. 5 disagree

E. Qualitative Question [1 question]

1. What changes would you make to reduce compliance burdens while protecting equity and public trust?