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Who Governs California's Schools? A Cross-State Map of Supervision, Administration, and Implementation in CA, FL, NY, and TX

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Who Governs California's Schools? A Cross-State Map of Supervision, Administration, and Implementation in CA, FL, NY, and TX

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Within the U.S. federalist system, State Educational Agencies (SEAs) administer the federal and state education policies that govern local educational agencies (LEAs), often with the goal of improving student experiences and outcomes. The context within which states govern K–12 public education has changed considerably over the past three decades. The passage of the No Child Left Behind Act and the Every Student Succeeds Act have expanded what SEAs are expected to do, even as their resources and staffing have often failed to keep pace (Manna, 2010; Murphy & Oujidani, 2011; Childs & Russell, 2017). In response, states have increasingly turned to networks of intermediaries — regional service agencies, nonprofit organizations, and contracted providers — to help carry out functions once handled directly by state departments of education (Honig, 2004; Russell et al., 2015; Trinidad et al., 2026). Understanding how policy gets translated into practice requires attention to the role of these external entities within state-level governance systems (Provan & Kenis, 2008).

This study advances a framework for analyzing state-level governance systems as three interconnected levels: supervisory authority, administrative authority, and implementation decision rights (Table 1). The framework makes visible the different ways SEAs assign authority and decision rights to the SEA itself and external entities. Supervisory authority refers to the authority to establish statewide policy priorities, expectations, and oversight frameworks for the education system. Administrative authority refers to the power to translate policy into enforceable requirements, make determinations of compliance or approval, issue binding guidance, and allocate resources under law. Implementation decision rights refers to discretion over the design, delivery, and coordination of programs and services within policy and regulatory parameters.

Guided by this framework, this study uses an original comparative institutional analysis of California, Florida, New York, and Texas to examine how large states allocate supervisory authority, administrative authority, and implementation decision rights across educational entities. We map

formal allocations of supervisory and administrative authority as defined in statute and regulation and delegation of implementation decision rights as outlined in official governance documents and state websites.

Distinguishing supervisory authority, administrative authority, and implementation decision rights as analytically distinct functions clarifies how state-level delegation operates. Prior research on state-level governance has largely treated delegation as a question of decision rights, focusing on the growing role of intermediaries, nonprofit organizations, and regional service providers in supporting districts and schools. Our framework allows us to distinguish between administrative authority and implementation decision rights to examine whether states delegate the authority to oversee and enforce policy in addition to discretion over how to deliver what is required under policy. This work is descriptive and conceptual, we do not examine how these arrangements operate in practice nor their effect on educational outcomes.

Table 1. Analytic Framework for State Educational Agency Functions: Supervisory Authority, Administrative Authority, and Implementation Decision Rights¹

Term	Definition	Typical Responsibilities	Typical Entity
Supervisory authority	The authority to establish statewide policy priorities, expectations, and oversight frameworks for the education system.	Adopt academic and assessment standards; approve accountability frameworks and major plans; adopt educator certification rules; act on certain appeals as specified in law.	State Board of Education
Administrative authority	The power to translate policy into enforceable requirements, make determinations of compliance or approval, issue binding guidance, and allocate resources under law.	Allocate federal funds; review and approve local accountability plans; conduct monitoring and issue findings; calculate and publish accountability results; manage assessments and data systems; issue and renew licenses.	Department of Education, led by the Chief State School Officer or an appointed Director.
Implementation decision rights	Discretion over the design, delivery, and coordination of programs and services within policy and regulatory parameters.	Provide technical assistance, coaching, and professional development; curate resources; facilitate collaboration.	Department of Education in partnership with statewide and regional public intermediaries; local school districts; institutions of higher education.

What emerges is a picture of California as a distinctive case, one that differs from its peers not just in complexity or scale, but in the way it has delegated administrative authority — the power to translate policy into enforceable requirements, make determinations of compliance or approval, and allocate resources under law — to multiple independent public entities outside its state department of education. In Texas, Florida, and New York, that kind of authority is held by the state's department of

¹ In practice, the boundaries between supervisory authority, administration, and implementation may be fluid depending on the function or context. For example, a state constitution or statute may assign overarching supervisory authority to a state board of education, while federal law and practice typically identify the state department of education as the SEA for purposes of funding, program implementation, and accountability. In such cases, the U.S. Department of Education interacts with and funds the department, not the board, even if state law grants the board ultimate supervisory authority.

education and exercised through its own staff. In California, it is dispersed across nearly 200 entities with formal governance roles beyond the state board, department, and local districts. These are autonomous public agencies, many of them governed by elected officials or independent boards, that hold statutory authority that is uncoupled from the California Department of Education.

We argue that California’s governance system has direct consequences for how education policy in the state gets designed, passed, implemented, and whether it achieves its intended outcomes. There are three core reasons for this effect. First, when administrative authority is fragmented across autonomous entities, changing policy requires not just administrative action but political negotiation — persuading independent bodies with their own priorities, constituencies, and timelines. Second, accountability becomes complicated when a state remains legally responsible under federal law for student outcomes, yet it lacks hierarchical control over many of the bodies that make binding decisions affecting those outcomes. This diffusion of accountability may obscure who is responsible for ensuring consistent protections for students and outcomes making it difficult for both the SEA and citizens to exert political accountability. Third, it results in a capacity paradox — a state might rely on intermediaries partly because it lacks the staff to deliver services directly, yet, at least in California’s case, effective coordination across nearly 200 autonomous entities itself demands a different kind of capacity that the state also struggles to sustain. These three features shape what is possible for any reform effort within the state.

The paper proceeds as follows. We first outline key concepts from the fields of political science and public administration that we apply here in relation to education governance. We then contextualize our work within existing literature on the role of state educational agencies and network governance in education. We proceed by describing our comparative institutional mapping methodology and presenting our findings. We conclude by discussing implications for theory, research, and policy.

Background

Governance, Delegation, and Metagovernance in Complex Policy Systems

For the past three decades, scholars of political science and public administration have described a shift away from hierarchical, command-and-control governance toward more networked arrangements involving partnerships, intermediaries, and shared decision-making authority (Kettl, 2015; Osborne, 2010; Provan & Kenis, 2008; Rhodes, 1997). In these systems, decision rights are often dispersed across multiple public and private actors, challenging traditional assumptions about how governments steer policy and ensure accountability. As authority and implementation are increasingly distributed, states often steer policy by structuring the institutional conditions under which other actors operate, rather than by issuing direct commands (Jessop, 2003). When governance arrangements involve actors with independent statutory authority, professional discretion, or democratic legitimacy, the effectiveness of hierarchical control is limited, requiring states to coordinate and align rather than direct (Kettl, 2015).

The concept of metagovernance offers a productive conceptual framework for understanding this challenge. Metagovernance refers to how states "govern the governance" of decentralized systems by structuring institutional arrangements, setting goals, shaping accountability frameworks, and retaining the capacity to intervene when arrangements fail (Jessop, 2003; Sørensen & Torfing, 2009). Critically, metagovernance directs attention to the strategic choices states make about how much and what kinds of authority and decision rights to retain versus disperse—and the tools through which they maintain steering capacity without direct control. From this perspective, governance centers on how authority and decision rights are allocated and exercised across multiple actors, with important implications for accountability and risk when legal responsibility remains centralized but authority is dispersed (Milward & Provan, 2000; Papadopoulos, 2007; Klijn & Koppenjan, 2014).

Although these insights have been widely applied in fields such as environmental policy, health care, and social services (Sabel & Zeitlin, 2012; Ferlie et al., 2011), they have been less systematically incorporated into education research. Education scholars have examined decentralization, intergovernmental relations, and the growing role of intermediaries, but without an explicit theory of

how states govern when authority itself is distributed. As a result, education policy lacks a clear framework for distinguishing between delegation of authority and decision rights. This gap becomes particularly consequential in domains like school improvement, where states may be held accountable for outcomes even when administrative authority is exercised elsewhere.

This theoretical gap has practical consequences. Without distinguishing between administrative authority and decision rights, policymakers risk oversimplifying governance challenges, treating problems of coordination across autonomous actors as if they were principal-agent compliance issues. It also obscures the metagovernance strategies states might employ: the specific levers, institutional designs, and accountability mechanisms through which they might attempt to steer without commanding. For example, when faced with complaints of low-performing agencies an elected official might push the department of education to require more detailed reporting on improvement activities in an effort to change organizational behavior when perhaps greater clarity on expectations or more communication between the state and those agencies could enhance their capacity to improve more effectively.

Education governance may pose particularly acute metagovernance challenges given constitutional constraints on centralization, democratic accountability through multiple levels (state, district, school boards) and traditions of professional autonomy. Understanding how states might navigate these constraints requires explicit attention to metagovernance. By examining how supervisory authority, administrative authority, and implementation decision rights are formally allocated within state education systems, we extend metagovernance concepts into the education domain and provide a foundation for understanding how states steer complex systems under conditions of shared authority.

The Evolving Role and Capacity of State Educational Agencies

Historically, SEAs were designed primarily as compliance-oriented bureaucracies responsible for distributing federal funds, monitoring adherence to statutory requirements, and collecting administrative data (Lusi, 1997; Murphy & Oujidani, 2011; VanGronigen et al., 2022). Under the No Child Left Behind Act, SEAs assumed more explicit responsibility for performance oversight, particularly

through the monitoring of student achievement data and enforcement of school-level accountability measures. The passage of the Every Student Succeeds Act (ESSA) in 2015 retained these accountability obligations while granting states greater discretion over standards, assessments, and accountability design. As a result, SEAs increasingly moved beyond regulation and compliance into policy design, system coordination, and instructional capacity building (Riley et al., 2019; Weiss & McGuinn, 2017).

ESSA placed school improvement at the center of SEA activity. States are required to identify schools for Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) and to ensure that interventions are evidence-based and responsive to local needs (Dunn & Ambroso, 2019; Woo et al., 2025). In practice, this has expanded SEAs' responsibilities to include reviewing and monitoring improvement plans, curating evidence-based practices, and providing technical assistance to districts and schools (Junge & Krvaric, 2017; Woo et al., 2025). Many SEAs were not originally structured to support continuous improvement at scale and often face limitations in analytic capacity, constrained staff expertise, and bureaucratic inertia, which can hinder their ability to move beyond compliance-oriented functions (Childs & Russell, 2017; Murphy & Oujidani, 2011; Weiss & McGuinn, 2017).

Support for instructional improvement offers an illustrative example of variation in how states structure school improvement systems. In Louisiana, for example, all ESSA-identified schools must adopt high-quality curricula in English language arts and mathematics and contract with approved professional-development vendors (Kaufman, Diliberti, Thompson, & Opfer, 2016). Tennessee and Ohio have adopted regional state teams to deliver on-the-ground technical assistance and engage district teams in continuous improvement and evidence-based intervention selection (Riley et al., 2019). Connecticut and Oregon, by contrast, have emphasized building local capacity through state practice guides and partnerships with districts (Woo et al., 2025). These differences illustrate variation in how states structure implementation systems, including whether improvement is organized through centralized SEA-directed mechanisms or through regional intermediaries with delegated responsibilities. Research provides some evidence that the consequences of these strategies depend on the SEA's internal capacity, including staffing, analytic infrastructure, and sustained leadership (Childs & Russell, 2017; Jochim & Murphy, 2013).

Ultimately, variation in SEA roles underscores both the flexibility and the challenges of U.S. education governance. ESSA’s decentralized framework has enabled states to experiment with different approaches, but disparities in SEA capacity have produced considerable variation in how states organize school improvement work (Seashore et al., 2008). These patterns suggest that delegation is not only a matter of who provides support, but also of whether states retain administrative authority over improvement functions or distribute that authority to other public entities. While much of the literature treats delegation as a question of implementation decision rights, this study asks whether and how states also distribute authority itself.

Network Governance

Network governance has emerged as one prominent response to the expanding role and constrained capacity of SEAs (Woo et al., 2025). *Network governance* refers to arrangements in which an SEA coordinates a set of semi-autonomous organizations—such as regional agencies, nonprofits, or vendors—to carry out supervisory, administrative, or implementation functions (Provan & Kenis, 2008; Woo et al., 2025). Rather than centralizing all responsibilities within the department of education, states may rely on these partner organizations to provide technical assistance, professional development, program oversight, and other services. Many states, for example, use regional service agencies, such as county offices of education in California, to perform functions traditionally associated with the SEA, including professional learning and elements of program implementation (Pak et al., 2021; Russell et al., 2015; Woulfin et al., 2018; Moffitt et al., 2018; Trinidad et al., 2025).

“Borrowing strength” from regional or local partners can help SEAs fulfill their legal responsibilities, enhance local collaboration with experts, and circumvent the tensions inherent in a state department’s dual role as both compliance monitor and support provider (Manna, 2006; Pak et al., 2021; Trinidad et al., 2025). However, when delegation to other public entities extends beyond implementation support to include administrative authority, it may also introduce risks of uneven quality, reduced coherence, and diffused accountability if partners’ capacities are overestimated (Glazer & Peurach, 2013; Manna, 2006; Russell et al., 2015). In some cases, network governance contributes to “state retreat” and effectively decouples a state’s elected or chosen educational leaders

from the actors and organizations implementing federal and state policies for which the state is ultimately held accountable (Trinidad et al., 2026, p. 380).

Network governance can also lead to a crowded and fragmented landscape of competing initiatives each with specialized expertise and discrete approaches to system improvement, requiring districts to engage in constant decision-making, coordination, and adaptation (Honig, 2004; Moffitt et al., 2018; Rowan, 2002). Research in other fields shows that the cumulative burden of repeated high-stakes choices at work may cause decision fatigue, leading education leaders to avoid making decisions or rely on defaults (Pignatello et al., 2020).

Overall, research on network governance in education has focused primarily on the delegation of implementation decision rights through intermediaries, leaving underexamined metagovernance and the ways in which states retain, share, or relinquish authority itself. Distinguishing between implementation decision rights and administrative authority is therefore central to understanding how states steer complex education systems under conditions of network governance and shared authority. This study takes up that distinction directly through comparative institutional mapping of authority in the nation's largest states.

Research Design

This study examines how supervisory authority, administrative authority, and implementation decision rights are formally allocated across state-level education entities. We address this question using comparative institutional mapping of California, Florida, New York, and Texas, drawing on statutory analysis, regulatory guidance, and triangulation with expert review. The primary data for this study are state statutes, administrative codes, and official governance materials that specify formal responsibilities; we treat these sources as evidence of legally codified institutional design rather than measures of implementation quality or educational performance. Institutions are understood as the formal rules, organizational structures, and statutory assignments of authority that enable and constrain state action (Scott, 2008). While the analysis draws conceptually on case study methodology (Merriam & Tisdell, 2016) and comparative institutional analysis (Aoki, 2001), we use this approach descriptively to map how responsibilities are allocated across entities rather than to assess the

effectiveness of any governance arrangement. The mapping produces a state-by-function matrix identifying which entities hold supervisory authority, administrative authority, or implementation decision rights for each core SEA function.

State Functions

Identifying a common set of core SEA functions provides a consistent basis for comparing how authority is distributed across states. Our first step was to identify a set of core functions assigned to SEAs under federal law. These “core functions” represent activities that SEAs are legally required to perform and that are commonly enacted across states.

We conducted a systematic document analysis (Bowen, 2009) of federal statutes governing state educational agencies. We began with the Every Student Succeeds Act (ESSA), the primary federal statute structuring SEA responsibilities, and identified all provisions assigning explicit duties to state educational agencies. We then expanded the corpus using criterion-based sampling to include federal statutes addressing specific dimensions of educational marginalization, including laws governing services for students with disabilities, students from low-income backgrounds, homeless and foster youth, and protections related to sex discrimination, as well as cross-cutting statutes applicable to federal grant administration (e.g., the General Education Provisions Act).

We identified 27 broad statutory responsibilities across federal education laws, which we grouped into 5 functions for analytic clarity: Federal program administration; standards, accountability, and system performance; LEA oversight and corrective action; programmatic support and improvement; equity assurance and access protections. In reviewing SEA organizational materials to triangulate these responsibilities, we identified two functions — teacher licensure and charter school authorization — that appeared on state agency websites but are governed primarily by state rather than federal law. Rather than exclude these functions on that basis, we reviewed relevant information in each of the four states to identify the legal basis and scope of SEA responsibility for each, applying the same coding procedures used for federal functions.

Table 2 summarizes these responsibilities and their associated legal authorities, ranging from high-level fiscal and compliance duties (e.g., applying for and managing federal grants) to activities such as administering statewide assessments, managing data systems, and overseeing educator licensure. Although we present these functions as discrete categories for analytic clarity, the boundaries between them are permeable in practice. For instance federal program administration requires fiscal oversight, standards and accountability systems depend on compliance monitoring, and programmatic support often operates alongside enforcement obligations. Where applicable, we triangulated statutory sections with guidance from the U.S. Department of Education, state websites, and secondary sources to clarify the practical implications of statutes and regulations (e.g., CCSSO, 2017; Education Commission of the States (ECS); Wright & Gallo, 2025). A full crosswalk of laws and regulations informing this categorization appears in Appendix A.

Table 2. Summary of SEA Activities and Associated Legal Authorities

Activity	Definition	Example	Associated Federal Law(s) and/or Regulation(s)
Federal Program Administration	Everything related to being the federal passthrough entity: receiving funds, managing them, and ensuring lawful use.	Grant Management; Fiscal Oversight (IDEA Part B); Subrecipient Monitoring; Records and Financial Reporting	General Education Provisions Act (20 U.S.C. § 1228a); Individuals with Disabilities Education Act (IDEA) 20 U.S.C. § 1411; McKinney-Vento Act (42 U.S.C. § 11431 et seq.); Perkins V (20 U.S.C. § 2301); Section 504 of the Rehabilitation Act (29 U.S.C. § 794); Uniform Grant Guidance (UGG) (2 C.F.R. Part 200)
Standards, Accountability, and System Performance	Statewide definition and monitoring of educational performance.	Establishing statewide accountability systems; reporting and public transparency; performance planning and reporting; teacher licensure	Every Student Succeeds Act (ESSA) 20 U.S.C. § 6301; IDEA; state-specific laws and regulations ESSA; IDEA; Perkins V; Government Performance and Results Act ² (31 U.S.C. § 1115)
LEA Oversight and Corrective Action	Oversight to ensure LEAs comply with statutory and regulatory requirements, with enforcement when they do not.	General supervision (IDEA); Monitoring and enforcement, Disability rights compliance, Civil rights compliance, Gender equity (Title IX), Data privacy and student records	ESSA; IDEA; Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g)
Programmatic Support and Improvement	Improving practice and supporting implementation.	Improvement support and resources, Technical Assistance to LEAs, fund/manage networks	ESSA; IDEA; McKinney-Vento Act
Equity Assurance and Access Protections	Ensuring that protected groups have access to programs and services.	Investigate complaints; issue findings; mediation/hearings.	Title VI of the Civil Rights Act (42 U.S.C. § 2000d); Title IX of the Education Amendments (20 U.S.C. § 1681); Section 504 of the Rehabilitation Act; Americans with Disabilities Act (42 U.S.C. § 12101 et seq.); IDEA; McKinney-Vento Act

² The Government Performance and Results Act (GPRA) applies only to federal agencies and does not directly govern SEAs. However, because the U.S. Department of Education is subject to GPRA, SEAs are often required to collect and report performance data to meet federal accountability requirements, particularly for formula and competitive grant programs.

Case Selection

We focus on the four largest states by population because prior research suggests that larger education systems tend to exhibit greater organizational and governance complexity due to increased differentiation of roles, greater numbers of actors, and heightened coordination demands (Meyer et al., 1987; McDonnell, 2004; Moffitt et al., 2018). California, Florida, New York, and Texas each serve large, diverse student populations, operate under the same federal statutory framework, and face similar challenges related to scale and geographic dispersion.

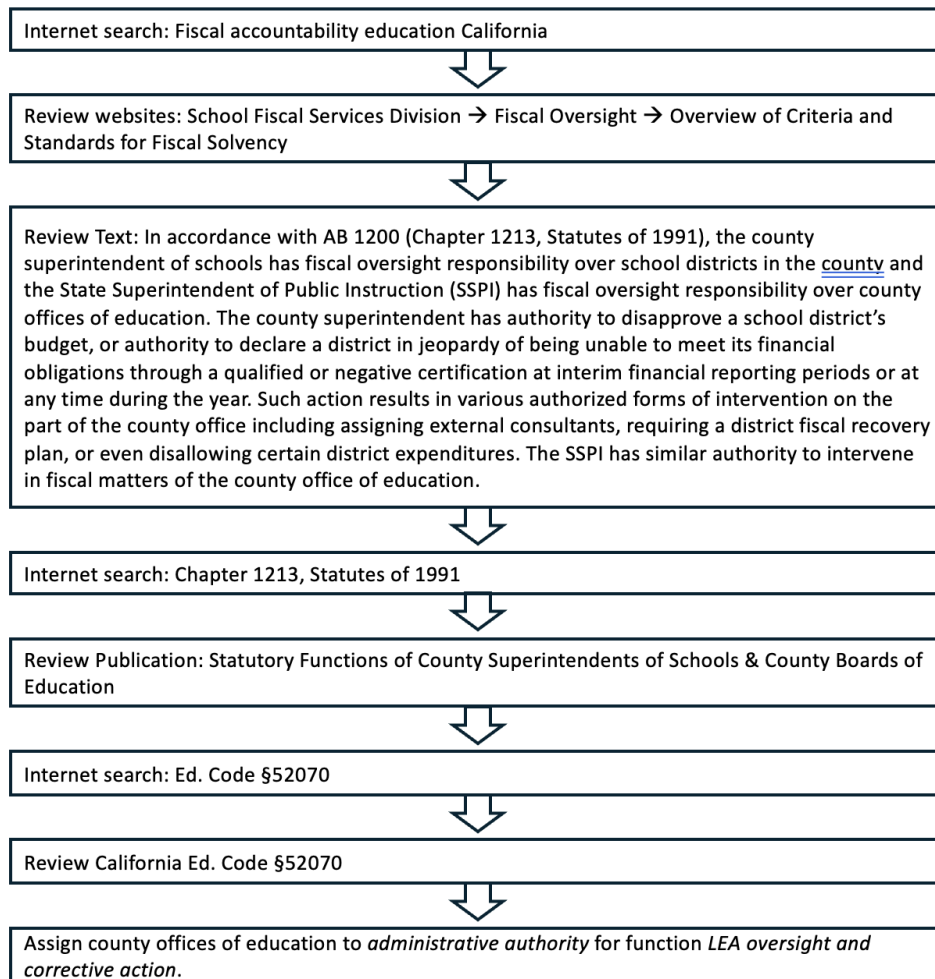
Despite operating under the same federal statutory framework, these states exhibit distinct constitutional and statutory governance arrangements, making them analytically useful for examining variation in formal delegation. This combination allows for comparison that holds constant federal policy context and system scale while highlighting meaningful variation in state governance. While our focus on large states means the specific scale of intermediary infrastructure documented here may not be directly comparable to smaller states, the governance dynamics we identify — the consequences of delegating administrative authority beyond the SEA, the coordination demands this creates, and the implications for accountability — are relevant to any state grappling with these structural questions, regardless of size

Data Collection and Coding

Data sources included state education statutes and regulations, state department of education websites, and nonregulatory guidance documents. We conducted a systematic document analysis (Bowen, 2009) to identify how formal responsibilities were allocated across educational entities within each state. The unit of analysis is the assignment of authority for a defined SEA function within each state; each function-state pair is coded according to which entity (or entities) holds supervisory authority, administrative authority, and implementation decision rights. Where statutes assigned shared or overlapping authority across entities, we coded each entity holding legally defined authority within that function, allowing for multiple entities to be identified within a single state–function domain.

Specifically, using a pre-specified codebook, we mapped each function identified under federal to the entity assigned responsibility under state law, regulation, or official guidance. The codebook distinguished among the three analytically distinct constructs of supervisory authority, administrative authority, and implementation decision rights. The first step was to conduct an internet search of the federal function plus the state name and then gather multiple sources of information from the search to triangulate the appropriate code. An example of the data collection and triangulation process is shown in Figure 1.

Figure 1. Example process to triangulate data and assign codes



Coding was completed by one researcher to ensure consistent application of definitions across states. To strengthen validity, entity assignments were cross-checked against multiple documentary

sources (statutes, administrative codes, agency guidance, organizational materials), and ambiguous cases were resolved through iterative review and expert consultation. All coding decisions were documented in a structured coding matrix with statutory citations to ensure transparency and replicability. Using iterative qualitative coding procedures (Saldaña, 2021), we identified discrete statutory responsibilities and grouped them into higher-order functional domains through constant comparison and analytic memoing. Table 3 provides examples from our New York codebook. A full table of entity assignments from the four states is provided in Appendix B.

Table 3. Coding Examples for Supervisory Authority, Administrative Authority, and Implementation Decision Rights

Code	Definition	Sources and Excerpts	Key Words
Supervisory Authority	The authority to establish statewide policy priorities, expectations, and oversight frameworks for the education system.	<p>NYSED webpage: “The Board of Regents has adopted Learning Standards in grades P-12 in the following areas...”</p> <p>END § 211: “The regents shall periodically review and evaluate the existing regents learning standards...”</p>	Adopt; Review; Evaluate
Administrative Authority	The power to translate policy into enforceable requirements, make determinations of compliance or approval, issue binding guidance, and allocate resources under law.	<p>NYSED webpage: “The Office of State Assessment (OSA) is responsible for the coordination, development, and implementation of the New York State Testing Program.”</p>	Coordination; Development; Implementation
Implementation Decision Rights	Discretion over the design, delivery, and coordination of programs and services within policy and regulatory parameters.	<p>NYSED 2025 letter to principals on administering tests: “Test materials for the Grades 3–8 ELA and Mathematics Tests will be sent to schools by the Department’s contractor, NWEA, and will be delivered by UPS.”</p>	Department’s contractor

Although we used keyword searches to identify implementing entities, we found that the term *implementation* in particular is used inconsistently in state documents and often encompasses activities beyond our analytic definition, which refers specifically to discretion over the design, delivery, and coordination of programs and services within policy and regulatory parameters (e.g., direct technical assistance or service provision). To improve accuracy, we triangulated implementing entities

across multiple documentary sources, including state statutes and regulations, organizational materials, budget documents, and competitive procurement records.

Nevertheless, certain contractual arrangements may not be fully visible in publicly accessible records. Entities operating under sole-source contracts, interagency agreements, or joint powers authorities may not appear in standard procurement databases. As a result, the entity counts presented should be interpreted as conservative estimates of organizational distribution rather than comprehensive measures of implementation intensity or influence.

More broadly, identifying the formal allocation of supervisory, administrative, and implementation authority is a necessary first step for understanding state education governance. However, documentary analysis alone cannot capture how these governance arrangements function in practice, including the relational dynamics, coordination processes, and capacity conditions that shape implementation outcomes.

Findings

This section reports how supervisory authority, administrative authority, and implementation decision rights are formally allocated across California, Florida, New York, and Texas. We first examine how statewide supervisory structures are formally configured across the four states. We then map which entities hold administrative authority over five core SEA functions. Finally, we describe how implementation decision rights are distributed in key domains such as school improvement, receivership, and teacher licensure, illustrating the different approaches to state governance of education.

Supervisory Authority

Supervisory authority is the authority to establish statewide policy priorities, expectations, and oversight frameworks for the education system. All four states employ a tripartite supervisory structure consisting of a state board of education, a chief state school officer (CSSO), and a state department of education. Within this structure, the states vary in two key dimensions.

First, states vary in which entity is designated in statute as the SEA under federal law (designated SEA). This designation determines which body holds formal supervisory responsibility for federal education policy. Second, states vary in whether the same political principal controls both the designated SEA and the state Department of Education (DOE), the entity responsible for carrying out policy. These differences shape how supervisory authority is aligned with administrative execution and therefore affect how authority may be delegated or contested within the system.

Table 4 illustrates this variation across California, Florida, New York, and Texas. In California and Florida, the State Board of Education (SBE) serves as the designated SEA, with the SBE president or chair signing the state's ESEA plan. In New York, the Commissioner of Education (the Chief State School Officer, or CSSO) is the designated SEA and signs the state plan. Texas designates the Department of Education (DOE) itself as the federal SEA, though the CSSO signs the ESEA state plan on behalf of the agency.

Table 4. Supervisory Authority in California, Florida, New York, and Texas

State	SEA(s) in State Statute	Designated SEA	Control of the Designated SEA	Control of DOE
CA	State Board of Education (SBE); Superintendent of Public Instruction (CSSO); State Department of Education (DOE).	SBE. The SEA is explicit and the SBE president signs the ESEA state plan.	The governor appoints SBE members and the Senate confirms them with a $\frac{2}{3}$ vote.	The CSSO directs the DOE and is elected by the public.
FL	SBE; Commissioner of Education (CSSO); DOE	SBE. The SEA is not explicit but the SBE has statutory responsibility for implementing and coordinating public education in the state. The CSSO signs the ESEA state plan.	The governor appoints the SBE members and the Senate confirms them with a simple majority vote.	The CSSO directs the DOE and is appointed by the governor.
NY	Board of Regents (SBE); Commissioner of education of the state of New York (CSSO); DOE	CSSO. The SEA is explicit and the CSSO signs the ESEA state plan.	The CSSO is appointed by the Board of Regents who are elected by the state legislature.	The CSSO directs the DOE and is appointed by the Board of Regents.
TX	State Board of Education (SBE); Commissioner of Education; DOE	DOE. The SEA is explicit, the CSSO signs the ESEA state plan.	The CSSO directs the DOE and is appointed by the governor.	The CSSO directs the DOE and is appointed by the governor.

Table 4 also shows whether the same political principal exerts control over the designated SEA and the DOE. That is, where the entity that sets policy and the entity that carries it out align under a single authority. These arrangements shape whether supervisory authority is politically unified or divided across multiple principals, with implications for coherence in statewide governance. We conceptualize this as a spectrum from unified to split control. We identify three configurations across the four states: unified control, split control, and insulated control.

Across the four states, supervisory authority varies primarily in the degree of political alignment between the entity designated as the SEA and the entity responsible for administration.

Unified Control

Florida and Texas are cases of unified control, where the governor controls both the designated SEA and the DOE. In Florida, the governor appoints the members of the SBE (which serves as the designated SEA), subject to Senate confirmation by simple majority. The governor also appoints the Commissioner of Education (CSSO), who directs the DOE. Similarly, in Texas, the governor appoints the Commissioner of Education, who runs the DOE (the designated SEA). While Texas has an elected State Board of Education with a governor-appointed chair, this board is not designated as the SEA and does not control the Department of Education.

Split Control

California is a case of split control, where different political principals control the designated SEA and the DOE. The governor appoints members of the SBE (the federal SEA), subject to Senate confirmation by a two-thirds vote. However, the Superintendent of Public Instruction (CSSO), who directs the DOE, is elected directly by voters. This creates a governance structure where the executive and the electorate separately control the two key education entities, with no requirement for alignment between them.

Insulated Control

New York represents a distinct form of unified supervisory control combined with institutional isolation. The state legislature elects the Board of Regents, which in turn appoints the Commissioner of Education (CSSO). Because the CSSO serves as both the federally designated SEA and the director of the DOE, supervisory authority is formally unified within a single governance chain. However, this chain is mediated through the Board of Regents, who exercise independent statutory authority to select the CSSO without further legislative or executive approval. While the legislature determines the composition of the Board, it does not directly control whom the Board selects as Commissioner. This intermediary structure creates a layer of insulation between the political principal (the legislature) and operational leadership of the SEA.

Administrative Authority

Administrative authority—the power to translate policy into enforceable requirements, make determinations of compliance or approval, issue binding guidance, and allocate resources under law—is distributed differently within the state systems. Administrative authority is where cross-state differences become most pronounced: California delegates administrative authority across multiple independent public intermediaries, whereas Florida, Texas, and New York retain most administrative authority within the SEA.

Table 5 presents which entities have administrative authority over the 5 core management functions across California, Texas, Florida, and New York. Table 5 shows that states vary markedly in the extent to which these functions are retained within the department of education (DOE) or statutorily delegated to intermediary organizations beyond the SEA. We describe the administrative authority of each function in each state.

Table 5. Administrative Authority in California, Florida, New York, and Texas

Core Function	California	Florida	NY	Texas	Delegation Pattern
Federal Program Administration and Fiscal Stewardship	DOE; COEs, and SELPAs.	DOE	DOE and Comptroller	DOE	CA extensive; NY partial
LEA Oversight and Corrective Action	DOE and COEs.	DOE	DOE	DOE	CA partial
Standards, Accountability, and System Performance	DOE, CCTC, and COEs.	DOE	DOE	DOE; SBE for educator Certification	CA extensive
Programmatic Support and Improvement	DOE, CCEE, and COEs.	DOE	DOE	DOE	CA extensive
Equity Assurance and Access Protections	DOE and OAH	DOE and OAH	LEA-appointed impartial hearing officer	DOE, OAH	Centralized

Note: DOE is the State Department of Education; SELPAs are special education local plan areas (SELPAs); FCMAT is the Fiscal Crisis Management Assistance Team; COEs are County Offices of Education; CCTC is the California Commission on Teacher Credentialing; CCEE is the California Collaborative for Educational Excellence; OAH is the State Office of Administrative Hearings; and SBE is the State Board of Education (or Board of Regents).

Across the five core functions, a consistent structural distinction emerges. California repeatedly assigns administrative authority to public intermediary bodies beyond the state department of education, whereas Florida, Texas, and New York retain most administrative authority within the SEA itself. The subsections below illustrate how this broader pattern appears in fiscal stewardship, accountability planning, licensure, and school improvement.

Authority over Federal Program Administration

As the passthrough entity for federal funds, SEAs are required to allocate them in accordance with the law where applicable and ensure lawful use of the funds by school districts. California is the only state which assigns elements of fiscal stewardship to statutorily created intermediary entities.

California's 135 SELPAs manage IDEA and state special education resources among their member LEAs. SELPA governing boards exercise discretion in how these resources are all allocated to support special education service delivery across member districts.

Fiscal management responsibilities in New York are shared among the New York State Education Department and the New York State Comptroller. The New York State Education Department (NYSED) is responsible for administering federal programs, allocating funds to LEAs, issuing fiscal and programmatic guidance, and reporting to the U.S. Department of Education. Independent of the education governance system, the New York State Comptroller conducts audits and reviews to ensure the lawful use of public funds, including federal funds once expended by the state or LEAs.

Texas and Florida, by contrast, retain fiscal stewardship functions within the SEA. The Texas Education Agency (TEA) Federal Fiscal Monitoring Division conducts fiscal monitoring, assigns financial accountability ratings, and exercises direct intervention authority in cases of fiscal distress. Regional Texas Education Service Centers provide technical assistance, but they operate under TEA direction and do not conduct independent fiscal reviews or hold any statutory authority. Similarly in Florida, fiscal monitoring and compliance are embedded within FLDOE's internal accountability and audit functions rather than delegated to external or intermediary entities.

Authority over LEA Oversight and Corrective Action

Across the four states, monitoring and enforcement authority is largely centralized within the SEA. California represents a partial exception in the area of fiscal oversight, where statutory responsibility is assigned to County Offices of Education (COEs). Under the state's education code (Cal. Educ. Code §§ 42127.6–42127.8), COEs are responsible for reviewing district budgets and multiyear financial projections, assigning fiscal status, and requiring fiscal recovery plans when necessary. County superintendents may assign fiscal advisors and county administrators in the case of severe fiscal distress. These authorities were shifted from the state department of education to COEs in 2018.

In Texas, monitoring and enforcement authority are consolidated within the Texas Education Agency (TEA). Under Texas Education Code Chapter 39A, TEA identifies districts and campuses for intervention, requires corrective action plans, appoints conservators or boards of managers, and may

impose sanctions. Florida and New York likewise centralize monitoring and enforcement authority within the departments of education.

Authority over Standards, Accountability, and System Performance

In standards and accountability planning, California extends administrative authority beyond the SEA through COEs and the California Commission on Teacher Credentialing (CCTC). In Texas, Florida, and New York, performance planning is centrally reviewed and approved by the SEA. Meanwhile County Offices of Education in California are statutorily responsible for reviewing and approving Local Control and Accountability Plans (LCAPs) and monitoring implementation and progress toward locally defined goals (Cal. Educ. Code §§ 52070–52075). County offices also review SELPA local plans pursuant to state and federal special education requirements (Cal. Educ. Code §§ 56195–56198). In Texas, Florida, and New York, performance plans are reviewed and approved by the SEA directly.

California separates teacher licensure from the SEA by vesting authority in the California Commission on Teacher Credentialing (CTC), an independent, governor-appointed body with its own staff and budget. The Commission holds administrative authority over teacher credentialing policy, including setting licensure standards, approving preparation programs, issuing credentials, and enforcing professional discipline (Cal. Educ. Code §§ 44200–44468). In Florida, New York, and Texas by contrast, teacher licensure is centralized. In Texas, the State Board for Educator Certification (SBEC)—a governor-appointed board administratively housed within TEA—sets licensure standards, approves preparation programs, issues credentials, and enforces discipline (Tex. Educ. Code §§ 21.031–21.060). In Florida, FLDOE establishes certification requirements, approves preparation programs, issues credentials, and oversees professional discipline (Fla. Stat. §§ 1012.56–1012.586). Likewise in New York, the NYSED administers credentialing, approves preparation programs, and enforces professional standards (N.Y. Educ. Law §§ 3001–3006).

Authority over Programmatic Support and Improvement

Consistent with the broader delegation pattern, in California, administrative authority for programmatic support and improvement is distributed across public intermediaries rather than consolidated within the SEA. The California Collaborative for Educational Excellence (CCEE) is statutorily

authorized to provide advice and assistance to districts, coordinate statewide improvement efforts, and support continuous improvement processes linked to accountability outcomes (Cal. Educ. Code § 52074). CCEE operates separately from the California Department of Education (CDE), with its own governing board and statutory mandate.

At the regional level, County Offices of Education (COEs) have statutory authority to review and approve district Local Control and Accountability Plans (LCAPs), provide technical assistance when districts fail to meet performance expectations, and monitor implementation of improvement actions (Cal. Educ. Code §§ 52070–52075). COEs are separately governed local agencies led by elected county superintendents and are not administratively subordinate to the CDE. While the SEA establishes statewide accountability priorities and indicators, county offices exercise their LCAP review and differentiated assistance responsibilities pursuant to statute rather than through delegation from, or direct managerial control by, the Department.

Florida, Texas, and New York do not have a statutorily created, statewide public intermediary equivalent to California’s Collaborative for Educational Excellence nor do they give administrative authority for programmatic support and improvement to regional entities. FLDOE, TEA, and NYSED all manage school improvement directly. Florida may engage external partners for capacity-building, as described in the section of implementation and decision rights, but the administrative authority for improvement supports and networked assistance remains centrally organized through the SEA. Texas law authorizes districts to request assistance from a regional education service center in developing and implementing campus turnaround plans, and to partner with an institution of higher education for the same purpose (Tex. Educ. Code § 39A.109). Similarly, Regional entities such as Boards of Cooperative Educational Services (BOCES) in New York frequently provide technical assistance and professional learning aligned to NYSED initiatives, but they are opt-in district-governed cooperative agencies that function as implementation support providers without administrative authority.

Equity Assurance and Access Protections

Across all four states, equity and access enforcement authority remains highly centralized relative to other governance functions. No state delegates investigative or adjudicatory authority to

regional education intermediaries. For example, California, Texas, and Florida assign special education due process hearings to centralized, statewide administrative court systems—respectively the Office of Administrative Hearings, the State Office of Administrative Hearings, and the Division of Administrative Hearings—that operate independently of the SEA, whereas New York maintains a list of impartial hearings officers which LEAs appoint for this purpose.

Implementation Decision Rights

Implementation decision rights refer to discretion over the design, delivery, and coordination of programs and services, like technical assistance or professional development, within policy and regulatory parameters. At the implementation level, decision rights are layered. Intermediary entities exercise discretion in designing and coordinating improvement supports, including the structure and content of technical assistance. LEAs, in turn, exercise discretion in operationalizing those supports within local instructional and organizational contexts.

In all four states, local educational agencies—and ultimately schools and educators—exercise discretion in operationalizing policy requirements. This section does not catalog those downstream decisions. Instead, it examines upstream implementation decision rights: the discretion granted to intermediary or contracted entities to design, coordinate, and deliver services that structure local action, including the design of technical assistance, professional development, assessment systems, and improvement supports. By focusing on these upstream decision nodes, the analysis isolates variation in how states distribute consequential design and coordination discretion beyond the SEA. Table 8 summarizes implementation decision-rights allocations across the five core SEA functions in each state, highlighting where discretion is retained within the SEA versus distributed to intermediary or contracted actors.

Implementation of Federal Program Administration

As shown in Table 8, implementation decision rights in federal program administration are limited across the four states. In Texas, Florida, and New York, implementation decision rights for federal fiscal systems are housed within the SEA. However, in California the Fiscal Crisis and Management Assistance

Team (FCMAT) is a legislatively created and state-funded entity (§§ 42127–42127.8) authorized to conduct fiscal and management reviews of LEAs when fiscal distress or risk of insolvency is identified. These reviews assess budgetary practices, internal controls, multiyear projections, and governance structures, and result in reports that identify findings and recommendations but do not carry independent enforcement authority.

Table 8. Implementation Decision Rights in California, Florida, New York, and Texas

Core Function	California	Florida	NY	Texas
Federal Program Administration	DOE, FCMAT, SELPAs	DOE	DOE	DOE
LEA Oversight and Correction Action	DOE, COEs.	DOE	DOE	DOE
Standards, Accountability, and System Performance	Sacramento COE, Educational Testing Services, WestEd, CCTC, COEs.	Cambium	Northwest Evaluation Associates; BOCES	Cambium and Pearson
Programmatic Support and Improvement	CCEE, COEs, SELPAs	Regional special education intermediaries housed within institutions of higher education, educational service agencies, and LEAs.	DOE; BOCES; teacher centers; institutions of higher education.	Regional Education Centers
Equity Assurance and Access Protections	LEAs	LEAs	LEAs	

Note: DOE is the State Department of Education; SELPAs are special education local plan areas; COEs are County Offices of Education; CCTC is the California Commission on Teacher Credentialing; CCEE is the California Collaborative for Educational Excellence; LEAs are Local Education Agencies (districts); and BOCES are Boards of Cooperative Services.

Implementation of LEA Oversight and Corrective Action

Implementation decision rights in monitoring and compliance are minimal across the four states. Complaint investigation, compliance determinations, and enforcement mechanisms reside within SEA authority structures. No state delegates discretion over the design of compliance systems or corrective frameworks to regional intermediaries.

Although California County Offices of Education participate in fiscal monitoring processes, these activities reflect statutory oversight functions rather than delegated discretion over the design or delivery of compliance-related services. Accordingly, monitoring and enforcement do not exhibit meaningful upstream implementation layering in any of the four states.³

Implementation of Standards, Accountability, and System Performance

All four states distribute implementation decision rights in standards and accountability through contracted assessment vendors and related entities (Table 8). In Texas and Florida, vendors such as Cambium and Pearson exercise discretion in test development and scoring processes within SEA-defined frameworks. New York similarly contracts with an external vendor — Northwest Evaluation Association (NWEA)— to develop and administer the grades 3–8 statewide assessments.

New York also has a regional infrastructure through which the assessment system operates. BOCES' Regional Information Centers (RICs) serve as the first point of technical support for districts administering computer-based state tests, host the Level 0 data system through which district student and staff data is processed and transmitted to NYSED's statewide accountability system, and provide score state assessments. While accountability frameworks and assessment content are centrally defined by NYSED, BOCES thus provide the regional operational infrastructure through which assessment delivery and accountability data reporting are implemented statewide.

California exhibits the most distributed structure in this domain. Assessment system implementation involves the Sacramento County Office of Education, Educational Testing Services, and WestEd. Additionally, the California Commission on Teacher Credentialing exercises discretion in implementing licensure processes, including credential issuance and program approval procedures. County Offices of Education also participate in performance-related service coordination.

³ California delegates portions of its statewide data system operations to the Kern County Office of Education, which implements components of the state's longitudinal data system under CDE authority. Texas and Florida operate their data systems entirely within the SEA. New York's BOCES assist with reporting but do not hold primary administrative responsibility for state-level data operations.

Implementation of Programmatic Support and Improvement

Programmatic support and improvement exhibit the greatest cross-state variation in implementation decision rights (Table 8). In all four states, entities beyond the SEA design and deliver technical assistance and professional development.

In California, implementation decision rights are distributed across multiple statutorily embedded public intermediaries. The California Collaborative for Educational Excellence (CCEE) is authorized under Cal. Educ. Code § 52074 to provide advice and assistance to LEAs and support continuous improvement efforts. California's 58 COEs are required under Cal. Educ. Code §§ 52070–52075 to provide differentiated assistance and technical support related to Local Control and Accountability Plans. California's 135 SELPAs, authorized under Cal. Educ. Code §§ 56195–56198, coordinate regional special education services and supports. COEs operate as county-level public agencies, typically led by elected county superintendents, and are not administratively subordinate to the California Department of Education. Collectively, these entities exercise discretion in structuring improvement networks, designing technical assistance, and coordinating cross-district supports.

In Texas, improvement implementation is primarily delivered through 20 Education Service Centers (ESCs), established under Tex. Educ. Code §§ 8.001–8.003. ESCs are statutorily created regional service agencies governed by boards drawn from member districts. While not divisions of the Texas Education Agency (TEA), ESCs operate within state-defined programmatic frameworks and frequently implement TEA-directed initiatives. They exercise discretion in designing and delivering professional development and technical assistance, including support for districts developing turnaround plans under Tex. Educ. Code § 39A.109.

In New York, implementation decision rights for programmatic support and improvement are distributed across multiple entities. NYSED's Office of Accountability directly organizes and provides support for schools identified for Comprehensive Support and Improvement (CSI) through its Field Support team. BOCES provide opt-in professional development and improvement-related services to member districts. Teacher centers design and deliver professional learning to educators. Institutions of higher education also play a role: NYU Metro Center, for example, operates as a NYSED-funded

Educational Partnership Center providing technical assistance in special education and bilingual education.

In Florida, decision rights for implementation are less institutionally embedded in permanent statutory intermediary structures. While Fla. Stat. § 1008.33 centralizes school improvement identification and intervention authority within the Florida Department of Education, regional support functions—particularly in special education—are typically delivered through 18 intermediaries housed within institutions of higher education, educational service agencies, or LEAs and funded through state or federal grant programs. These entities exercise discretion in designing and delivering technical assistance within the parameters of programmatic or contractual arrangements administered by the SEA.

Across the four states, therefore, programmatic support and improvement involve distributed decision rights in all cases. California’s structure relies on multiple statutorily embedded public intermediaries, Texas and New York rely on statutorily established regional service agencies with defined service roles, and Florida relies more frequently on contract- or grant-based intermediary arrangements.

Implementation of Equity Assurance and Access Protections

Implementation decision rights for equity assurance and access protections are concentrated at the local level in all four states. While SEA-level agencies investigate complaints and adjudicatory bodies issue binding decisions, discretion over the delivery and operationalization of ordered remedies—including compensatory education, placement changes, and procedural adjustments—rests with LEAs. No state delegates service-design discretion in this domain to regional intermediaries.

Summary of Findings

Across the three dimensions of governance examined here, a consistent pattern emerges. On supervisory authority, the four states cluster into three configurations: Florida and Texas achieve unified control through gubernatorial appointment of both the designated SEA and the department

leadership; New York achieves insulated unified control through the Board of Regents, which appoints the Commissioner who leads both; and California exhibits split control, with the governor appointing the State Board while voters independently elect the Superintendent of Public Instruction who directs CDE.

On administrative authority, the divergence sharpens. Florida, Texas, and New York retain administrative authority within the SEA across nearly all five core functions, with only minor exceptions such as New York's shared fiscal authority with the Comptroller. California distributes administrative authority extensively across independent public bodies — SELPAs govern special education fiscal stewardship, COEs hold approval authority over local accountability plans and fiscal oversight, CCTC independently controls teacher licensure, and CCEE coordinates programmatic improvement — none of which are subordinate to CDE.

On implementation decision rights, all four states distribute responsibilities beyond the SEA, but again the form differs: Texas relies on 20 regionally embedded Education Service Centers, New York on 37 BOCES and 123 teacher centers, Florida on a more flexible network of contract- and grant-based intermediaries housed within higher education institutions and LEAs, and California on a structure in which intermediaries hold their roles by statute and operate through independent governing structures, making them the least subject to redirection or consolidation by the SEA. Tables 6 and 7 synthesize these patterns across states and functions.

The findings document a governance structure that is distinctive in its complexity and its form. California has not simply built a larger network of implementers than other large states — it has delegated administrative authority to independent public bodies that the state department cannot hierarchically control. This distinction has direct implications for how we understand recent governance debates in California and for broader theoretical questions about how states steer decentralized education systems.

Table 6. Governance Configuration Across the Four Largest States

State	Supervisory Alignment	Administrative Authority Delegation	Implementation Decision Rights Delegation	Governance Type
CA	Split control (Governor–elected SPI)	Extensive: Highly delegated to independent public intermediaries.	Extensive: Highly distributed via regional intermediaries and semi-governmental entities.	Split-Distributed
FL	Unified gubernatorial control	Limited: Nearly all administrative authority centralized in DOE.	Limited: Some distributed via grant- or contract-based intermediaries.	Unified-Centralized
NY	Insulated unified control (Regents-mediated)	Limited–Moderate Some shared fiscal authority (e.g., Comptroller), but core administrative authority centralized in NYSED	Extensive: Highly distributed via DOE, BOCES, teacher centers, and IHEs.	Insulated-Centralized
TX	Unified gubernatorial control	Limited: Administrative authority largely centralized in TEA	Moderate: Distributed via Education Service Centers and assessment vendors	Unified-Centralized

Table 7. Statutory and Federal SEAs in California, Florida, New York, and Texas

State	SEA(s) in State Statute	Single SEA for Federal Purposes	Supervise	Administer	Implement	Citation
CA	SBE; CSSO; DOE.	SBE, The federal SEA is explicit (CA Educ Code §12032), the SBE president signs the ESEA state plan.	SBE, members appointed by the governor and president elected by the board.	CSSO, elected by voters.	DOE, led by the CSSO	Cal. Educ. Code, tit. 2, div. 2, Part 20 (State Educational Agencies) (Justia)
FL	SBE; CSSO; DOE	SBE, SEA is not explicit, but SBE has statutory responsibility for implementing and coordinating public education in the state. CSSO signs the ESEA state plan.	SBE, members appointed by the governor, president elected by the board.	CSSO, appointed by the governor.	DOE, led by the CSSO	Fla. Stat. ch. 229 (Functions of State Educational Agencies) (Justia)
NY	SBE; CSSO; DOE	CSSO, SEA is explicit, the CSSO signs the ESEA state plan.	SBE, regents elected by the State Legislature, chancellor elected by the regents.	CSSO, appointed by the SBE	DOE, led by the CSSO	N.Y. Educ. Law, art. 3, § 101; § 3713
TX	SBE; CSSO; DOE	DOE, SEA is explicit, the CSSO signs the ESEA state plan.	SBE, members elected by voters, chair appointed by the governor.	CSSO, appointed by the governor.	DOE, led by the CSSO	Tex. Educ. Code §§ 7.002; 7.021; 29.001(a)

Note: SBE is the State Board of Education (or Board of Regents); CSSO is the Superintendent of Public Instruction (or Chief State School Officer); DOE is the State Department of Education.

Discussion

The governance configurations documented here carry implications at multiple levels. For university-based scholars, they extend metagovernance concepts into the education domain and offer a new framework for distinguishing among supervisory authority, administrative authority, and implementation decision rights in state education systems. For researchers and analysts working at the intersection of policy and practice, they provide a comparative institutional map of how the four largest states formally allocate authority — a foundation for understanding why similar federal policies produce different implementation experiences across states. And for policymakers, particularly those working in California, they offer a structural account of why coordination across autonomous entities is not simply a management challenge but a durable feature of the governance landscape that shapes what reform strategies are likely to succeed. The sections that follow develop each of these implications in turn, beginning with what distributed administrative authority means for state capacity and governance reform, and concluding with a research agenda for understanding how states can steer complex education systems under conditions of shared authority

Practical Implications of Distributed Administrative Authority

Much of the literature on state education governance treats outsourcing and network governance as strategies for extending state capacity in the face of expanding policy demands (e.g., Honig, 2004; Glazer & Peurach, 2013; Rowan, 2002; Russell et al., 201). In this work, delegation is typically understood as the transfer of implementation decision rights — such as technical assistance, professional development, or service delivery — to intermediaries that operate under state oversight. Our findings suggest that this framework is incomplete. By distinguishing among supervisory, administrative, and implementation decision rights, we show that states vary not only in whether they rely on networks, but in what forms of authority they delegate to external entities. When administrative authority is delegated beyond the SEA — not just implementation, but the legal power to approve plans, issue licenses, and enforce compliance — the governance challenge shifts fundamentally. When a state can no longer rely on hierarchical direction to achieve policy coherence; it must instead coordinate, negotiate, and build alignment across entities it does not control.

Teacher licensure illustrates how this distinction alters policy processes. In Texas, when the state seeks to modify certification requirements, the process is relatively straightforward: the State Board for Educator Certification adopts the policy change and the Texas Education Agency implements it through department staff. Authority over rulemaking and implementation is institutionally aligned under the Commissioner. In California, the same change requires a fundamentally different process. Neither the State Board of Education nor the California Department of Education can modify certification requirements; that authority resides with the Commission on Teacher Credentialing, an independent state agency with its own governing board, statutory authority, and budget. When federal guidance requires states to ensure teacher preparation programs address specific competencies — such as evidence-based reading instruction — Texas can direct its department to revise program approval standards. California must instead coordinate with an autonomous Commission whose interpretations and decision processes the SEA cannot control. As a result, the SBE’s formal designation as the SEA for federal purposes does not necessarily align with its practical authority to implement policy changes in this domain.

This example reflects a broader structural pattern documented across the five core functions examined in this study. California consistently delegates administrative authority to entities the state department cannot hierarchically control, while Florida, Texas, and New York retain that authority within the SEA. For California policymakers and reformers, the practical implication is that governance reform efforts focused primarily on strengthening compliance incentives or clarifying the chain of command within the SEA are likely to encounter the limits of a principal-agent approach in a system where many of the relevant actors are not agents of the state in any straightforward sense. The Commission on Teacher Credentialing, County Offices of Education, and Special Education Local Plan Areas hold their authority by statute, not by delegation from CDE. Changing what they do requires persuasion, negotiation, and in some cases legislative action. Absent legislative action, reform strategies that instead focus on coordination mechanisms, shared accountability frameworks, and the design of information systems that span autonomous entities are more likely to succeed.

Delegated Authority Requires New Forms of State Capacity

Distributing authority does not simply shift workload away from the state; it reshapes the type of capacity required. Existing accounts often assume that distributing functions reduces demands on central agencies by shifting work outward (Milward & Provan, 2000; Manna, 2006). Our analysis suggests instead that administrative authority delegation *transforms*, rather than diminishes, capacity requirements. Where administrative authority is centralized, state capacity needs are primarily technical and managerial: the ability to deliver programs directly, monitor performance, and ensure compliance. Where administrative authority is distributed, capacity becomes relational and political: the ability to coordinate across autonomous actors, negotiate shared priorities, and construct coherence across overlapping jurisdictions (Rhodes, 1997; Provan & Kenis, 2008). These demands are especially acute when delegated entities possess their own democratic accountability, professional norms, or legal authority, limiting the SEA's ability to rely on hierarchical control.

This insight builds on and extends prior work on SEAs as conveners and brokers in networked reform environments (Russell, 2015; Woo et al., 2025). In California, the SEA must coordinate across nearly 200 autonomous entities, many of which possess independent statutory authority or democratic accountability. This coordination work requires four distinct organizational capacities.

First, it requires SEAs to function as conveners and sense-makers across providers (Woo et al., 2025). This means ongoing engagement with intermediary leaders, creating forums for shared problem-solving, and maintaining relationships that enable informal coordination. Second, when implementation entities have independent statutory authority or democratic accountability—as California's elected county superintendents do—coordination requires negotiation, persuasion, and consensus-building rather than hierarchical command (Provan & Kenis, 2008; Rhodes, 1997). Third, the SEA must monitor whether nearly 200 entities are implementing state policies consistently and effectively — a qualitatively different oversight challenge than monitoring within a single organization, and one where overestimating partners' capacities risks uneven quality and reduced coherence (Glazer & Peurach, 2013). Fourth, when implementation occurs across many sites, the state must aggregate learning, identify patterns, and feed insights back into policy development; without this capacity,

networked approaches can produce a fragmented landscape in which districts experience state guidance as contradictory rather than integrated (Honig & Hatch, 2004).

Together, these findings suggest that state capacity is best understood in relation to the governance model through which states administer and coordinate education policy. A state pursuing centralized administration needs capacity for direct service delivery and hierarchical oversight. A state pursuing distributed administration needs capacity for network coordination, political negotiation, and system-level sense-making. These are not interchangeable skill sets, and increasing one form of capacity does not necessarily strengthen the other.

The Networked Governance Paradox in California

California relies on intermediaries in part because CDE lacks capacity for direct delivery, ranking 45th nationally in staffing with just 0.462 staff per 1,000 students (Childs & Russell, 2017). Yet effective coordination of 198 autonomous entities requires relational and political capacity that may be difficult to sustain under current staffing and structural conditions. The state faces capacity constraints in both domains: too few staff to deliver services directly and too little infrastructure to coordinate effectively across autonomous implementers. This paradox helps explain why California's distributed governance can feel fragmented to districts navigating multiple intermediaries with overlapping roles, and why state policy intentions can get lost in translation across implementation layers. Understanding this paradox is essential for interpreting current governance debates in California and for designing reforms that address underlying structural challenges rather than merely symptoms.

California as a Case of Large-Scale Delegated Administrative Authority and Institutional Layering

California's governance structure reflects the accumulation of new entities and responsibilities layered onto existing institutions rather than wholesale reorganization of authority (Mahoney & Thelen, 2010). Over time, this layering has produced a governance system composed of boards, departments, commissions, and regional agencies exercising distinct but interdependent roles. Delegation of core

education functions to entities other than the SEA is not only a strategic or efficiency-oriented choice, but also a historically conditioned institutional development shaped by prior arrangements. Once established, such institutions become embedded within legal frameworks, stakeholder networks and operational routines, making subsequent consolidation difficult (Mahoney & Thelen, 2010).

California presents a case of both formal fragmentation and resource constraint. The California Education Code (Part 20, Title 2, Div. 2) designates multiple entities as SEAs, including the State Board of Education, the Superintendent of Public Instruction, and the Department of Education. At the same time, California maintains relatively limited state-level staffing capacity compared to other large states, while remaining subject to the same federal accountability requirements. This combination of fragmented authority and constrained administrative infrastructure shapes how governance functions are distributed across public bodies.

These arrangements are further embedded within California's long-standing tradition of local control, codified in the state constitution and reinforced by policies such as the Local Control Funding Formula (LCFF), which limits the SEA's authority to direct district-level decision-making (Taylor, 2014). Compared to Florida and Texas, where state departments possess stronger legal authority to mandate interventions or replace district leadership, California's SEA occupies a more constrained position: formally accountable under federal statutes such as ESSA and IDEA, yet lacking hierarchical control over many entities exercising administrative authority.

Institutional layering also creates incentives for the creation of additional entities when existing structures constrain executive authority. The creation of the California Collaborative for Educational Excellence (CCEE) in 2013 illustrates this dynamic. CCEE was established in 2013 as a new state agency operating separately from the California Department of Education, with authority to provide advice and assistance to districts under the LCFF (Fensterwald, 2013). Its creation outside of CDE exemplifies the institutional layering dynamic described above: when hierarchical authority over existing agencies is limited, new parallel structures emerge to carry out policy goals.

Recent reform proposals highlight the continuing relevance of these structural dynamics. The elected Superintendent of Public Instruction serves as the public face of K-12 education and historically

leads the California Department of Education, but lacks the formal statutory authority held by commissioners in other states. Instead, the State Board of Education retains significant control over CDE operations, including budgetary authority and policy direction. This structure creates role ambiguity in which neither the elected superintendent nor the appointed board holds clear executive authority over the department (Myung, 2025). As outlined in a recent Policy Analysis for California Education report, this structure has contributed to coordination challenges, competing directives, difficulties in strategic planning, and public confusion about accountability—challenges that became particularly evident during the COVID-19 pandemic and implementation of the Local Control Funding Formula (Myung, 2025).

In response, Governor Gavin Newsom proposed as part of his 2026-27 budget a fundamental restructuring that would create a governor-appointed Secretary of Education to serve as CDE director under the authority of the governor-appointed State Board. The elected State Superintendent would be reconstituted as a board member focused on cross-sector coordination and public engagement but without departmental administrative authority. This would move California toward executive alignment similar to Texas and Florida.

The proposal has generated significant debate. State Superintendent Tony Thurmond, the California Teachers Association, and others have opposed it as eliminating democratic accountability and concentrating excessive power in the governor's office (Fensterwald, 2025). Supporters, including State Board President Linda Darling-Hammond, argue that clearer lines of authority would improve coordination and address structural dysfunction. As of this writing, the proposal requires legislative action and has not been enacted.

Whether California adopts this restructuring or maintains its current arrangement, the debate underscores that formal governance design—particularly the alignment or fragmentation of supervisory and administrative authority—has consequences for how SEAs coordinate policy, implement reforms, and sustain accountability. At the same time, this proposed reform addresses only one dimension of California's broader governance configuration. Even if supervisory authority were more fully consolidated, California would continue to exhibit extensive delegation of administrative authority to independent entities like CCEE, the Commission on Teacher Credentialing, and county

offices of education. These statutory intermediaries would remain autonomous regardless of changes in the superintendent's role, highlighting that the state's governance complexity reflects not only supervisory fragmentation but also the institutional layering of delegated administrative structures over time.

Conceptual Implications of Administrative Delegation as a District Governance Form

This study makes visible an undertheorized form of governance delegation. Our findings show that states vary in whether they delegate authority itself — the legal power to approve plans, issue licenses, and enforce compliance — and that this variation has consequences for how governance operates that cannot be captured by focusing on implementation networks alone. For education governance scholars, the concept of metagovernance — how states govern the governance of decentralized systems by structuring institutional arrangements, setting goals, and retaining the capacity to intervene when arrangements fail (Jessop, 2003; Sørensen & Torfing, 2009) — may offer a more productive framework for understanding California's governance structure than principal-agent models that assume hierarchical control. Although the metagovernance concept has been applied in public administration and political science, it has been only implicitly theorized in education research (Jessop, 1998, 2003; Rhodes, 1997).

Our findings suggest that metagovernance is especially salient in education systems characterized by administrative delegation, where autonomous public bodies hold administrative authority outside the SEA. Entities such as California's county offices of education are not contractors or advisory bodies; they are statutory actors with their own governance structures, budgets, and accountability relationships. In such cases, an SEA cannot rely on hierarchical command to achieve policy coherence, even though it remains legally accountable under federal statutes such as ESSA and IDEA.

This configuration differs qualitatively from more familiar forms of network governance in education, where intermediaries support implementation while administrative authority remains

centralized within the SEA (Honig, 2004; Provan & Kenis, 2008). In such systems, delegation primarily raises questions about contract management, quality assurance, and performance oversight. In systems characterized by administrative delegation, by contrast, the central governance challenge becomes *how the state coordinates, aligns, and steers the exercise of authority* across autonomous entities that it does not hierarchically control. The governance challenge shifts from technical policy development to political coordination.

Much of the accountability literature in education focuses on vertical relationships between states, districts, and schools, often conceptualized through principal-agent frameworks that assume hierarchical control and monitoring (McDonnell, 2004; Moe, 1984). But in systems characterized by administrative delegation autonomous intermediaries may exercise discretion without bearing full responsibility for federal compliance or system-wide equity outcomes, while the SEA remains the entity of record for federal oversight, civil rights enforcement, and litigation.

From a metagovernance perspective, accountability in such systems depends less on sanctioning individual actors for poor performance and more on the state's ability to design processes, incentives, and information systems that shape how delegated authorities make decisions. This includes clarifying expectations through policy guidance, facilitating shared learning across implementing entities, creating feedback loops that surface implementation challenges, and intervening selectively when public values—such as equity, civil rights, or access—are at risk. Education research has begun to examine these dynamics in studies of inspection regimes, differentiated oversight, and continuous improvement systems (Ehren et al., 2013; Elmore, 2004; Bryk et al., 2015), but administrative delegation remains largely absent from this conversation.

Research Implications: Designing and Evaluating Metagovernance Mechanisms

When administrative authority is dispersed beyond the SEA, governance increasingly depends on the design and operation of metagovernance mechanisms that structure coordination, oversight, and accountability. Future research could examine how different metagovernance arrangements shape policy coherence, equity outcomes, and the experiences of districts and schools navigating distributed

systems. Empirical work is needed to assess which coordination mechanisms—such as shared data systems, communities of practice, peer review processes, or formal escalation protocols—are most effective in systems characterized by administrative delegation. Comparative research across states could illuminate whether particular configurations of supervisory, administrative, and implementation authority are associated with stronger outcomes or greater equity. Finally, research could examine the political economy of administrative delegation: under what conditions do states choose to delegate authority, and what factors enable or constrain subsequent efforts to recentralize or reorganize?

By making administrative delegation visible as a governance choice with distinct implications for capacity, coordination, and accountability, this study opens new avenues for understanding how states govern education systems under conditions of complexity, constraint, and shared authority.

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Appendix A: Laws and regulations assigning SEA responsibilities.

Law/Regulation	Function Area	SEA Responsibility
Education Department General Administrative Regulations (EDGAR)	Grant Management	Apply for and manage federal education grants with fiscal accountability. (34 C.F.R. § 76.301).
	Subrecipient Monitoring	Ensure LEAs receiving federal funds comply with requirements through oversight. (34 C.F.R. § 76.770).
	Records and Reporting	Maintain records and provide program and financial reports as required. (34 C.F.R. § 76.731–734).
	Equitable Participation	Ensure private school students and teachers have equitable access to federally funded programs. (34 C.F.R. § 76.650–662).
Every Student Succeeds Act (ESSA)	Standards and Assessments	Ensure academic standards are aligned with college and career readiness and administer statewide assessments. 20 U.S.C. § 6311(b)
	Establishing Statewide Accountability Systems	Develop and implement plans to identify and support low-performing schools 20 U.S.C. § 6311(c)
	Support and Improvement	Provide technical assistance and oversight to LEAs identified for support and improvement. (20 U.S.C. § 6311(d))
	Reporting and Public Transparency	Produce state and local report cards and ensure public access to school performance data (20 U.S.C. § 6311(h)).
	Educator Effectiveness and Equity	Ensure equitable access to effective and experienced teachers for low-income and minority students. (20 U.S.C. § 6311(g)(1)(B)).

Law/Regulation	Function Area	SEA Responsibility
Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g)	Data Privacy and Student Records	Oversee compliance with student data privacy requirements and manage secure data sharing and reporting systems.
General Education Provisions Act (GEPA) GEPA, 20 U.S.C. § 1228a	Equity in Program Access	Describe how federally funded programs will be designed to eliminate barriers to access for underrepresented groups (e.g., gender, race, language).
Individuals with Disabilities Education Act (IDEA)	General Supervision	Ensure IDEA requirements are met and that educational programs for children with disabilities comply with the law (20 U.S.C. § 1412(a)(11))
	Monitoring and Enforcement	Monitor LEA implementation of IDEA and enforce corrective action when needed. (34 C.F.R. § 300.600–602)
	Fiscal Oversight	Manage allocation and appropriate use of IDEA Part B funds. (34 C.F.R. § 300.221–300.226).
	Performance Planning and Reporting	Develop and submit a State Performance Plan and Annual Performance Reports. (20 U.S.C. § 1416).
McKinney-Vento Act (42 U.S.C. § 11431 et seq.)	Support for Homeless Students	Appoint a state coordinator, ensure LEA compliance, and provide technical assistance for serving homeless youth.
Perkins V (20 U.S.C. § 2301 et seq.)	Career and Technical Education Oversight	Oversee development and implementation of CTE programs, ensure labor market alignment, allocate funds to local providers, and coordinate with workforce systems.
Section 504 of the Rehabilitation Act (29 U.S.C. § 794)	Disability Rights Compliance	Ensure non-discrimination in public education for students with disabilities and provide oversight of LEA responsibilities.

Law/Regulation	Function Area	SEA Responsibility
Title VI of the Civil Rights Act (42 U.S.C. § 2000d et seq.)	Civil Rights Compliance	Ensure that recipients of federal funds do not discriminate based on race, color, or national origin.
Title IX of the Education Amendments (20 U.S.C. § 1681 et seq.)	Gender Equity	Support LEA compliance with Title IX and monitor gender-based discrimination in federally funded education programs.
Uniform Grant Guidance (2 C.F.R. Part 200) and other federal grants management laws (e.g., single audit requirements).	Federal Grants Management	Ensure effective financial management of federal education funds by establishing internal controls, monitoring subrecipients, maintaining allowable use of funds, preventing waste, fraud, and abuse, and complying with cost principles, procurement standards, and audit requirements.

Appendix B. Full Table of Core Function and State Assignments

Core Function	California	Texas	Florida	NY
Apply for and administer SEA-level federal grants	SBE, (supervises); DOE, (administers); 135 public intermediaries called special education local plan areas (SELPAs; Administer) ⁴	DOE	DOE	DOE
Monitor LEAs and enforce fiscal compliance.	DOE (supervises); 58 COEs (administer and implement).	DOE	DOE	DOE
Academic standards and statewide assessments.	SBE (Supervises); DOE (Administers); Public intermediary Sacramento COE, and private contractors Educational Testing Services and WestEd (Implement)	SBE (Supervises); DOE (Administers); Private contractors Cambium and Pearson (Implement)	SBE (Supervises); DOE (Administers); Private contractor Cambium (Implements)	SBE (Supervises); DOE (Administers); Private contractor Northwest Evaluation Associates (Implements)
Accountability systems	SBE (Supervises); DOE (Administers); DOE and 58 COEs (Implements)	DOE	SBE (Supervises); DOE (Administers and Implements)	SBE (Supervises); DOE (Administers and Implements)
School improvement	SBE (Supervises); DOE (Administers); public intermediaries CCEE, 58 COEs, and 135 SELPAs(Implement)	DOE (Supervises and Administers); 20 public intermediaries called Regional	SBE (Supervises); DOE (Administers) DOE regional support teams	SBE (Supervises); DOE (Administers); DOE, and public intermediaries

⁴ SELPA governing boards determine allocation of IDEA funds to LEA in their regions.

Core Function	California	Texas	Florida	NY
		education centers (Implements)	and 18 public intermediaries specifically for special education. Fiscal agencies for these projects are institutions of higher education, educational service agencies, and local educational agencies. (Implement)	including 37 BOCES and 123 teacher centers; two institutions of higher education (Implement)
Data systems	SBE (Supervises); DOE (Administers); Public intermediary Kern COE (Implements)	DOE	DOE	SBE (Supervises); DOE (Administers); 37 BOCES (Implements)
Performance planning & reporting	SBE (Supervises); DOE and 58 COEs (Administer); 1,384 Local Educational Agencies (LEAs) and (Implement)	SBOE (Supervises); TEA (Administers); 1,208 LEAs (Implement)	SBE (Supervises); FDOE (Administers); 67 LEAs (Implements)	SBE (Supervises); DOE (Administers); 730 LEAs (Implement)
Civil rights, complaints, & due process	DOE (Supervises and Administers); OAH (Implements)	DOE (Supervises and Administers); OAH (Implements)	DOE (Supervises and Administers): Division of	DOE (Supervises and Administers);

Core Function	California	Texas	Florida	NY
			Administrative Hearings (Implements)	730 LEAs ⁵ (Implements)
Teacher licensure ⁶	Governor-appointed commission ⁷	State Board for Educator Certification (Supervises); DOE (Administers and Implements)	SBE (Supervises): DOE (Administers): DOE and LEAs (Implements)	DOE (Supervises and Administers); 730 LEAs ⁸ (Implement)
Charter school authorizing and oversight	1,384 LEAs ⁹	SBOE (Supervises); DOE (Administers and (Implements)	67 LEAs and three Institutions of Higher Education ¹⁰	SBE and one Institution of Higher Education ¹¹
Unduplicated Total Beyond the SBE, CSSO, DOE, and LEAs	198	24	23	164

Note: DOE is the State Department of Education; SELPAs are special education local plan areas; COEs are County Offices of Education; CCTC is the California Commission on Teacher Credentialing; CCEE is the California Collaborative for Educational Excellence; LEAs are Local Education Agencies (districts); and BOCES are Boards of Cooperative Services.

⁵ Hearings are conducted by Impartial Hearing Officers (IHOs) appointed by each board of education from a state-certified roster; appeals go to the State Review Officer at NYSED. In New York City, special-education hearings are administered by the NYC Office of Administrative Trials and Hearings.

⁶ Assignment monitoring is the responsibility of County Offices of Education in California, and school districts in Texas and Florida.

⁷ California Commission on Teacher Credentialing consists of fifteen voting members, fourteen appointed by the Governor and one (State Superintendent) elected by voters.

⁸ BOCES may report data for monitoring teacher assignments.

⁹ SBE may hear appeals.

¹⁰ County Board and SBE may hear appeals.

¹¹ The DOE formerly issues charters.