From Policy to Impact

A State Education Agency's Guide to Implementation

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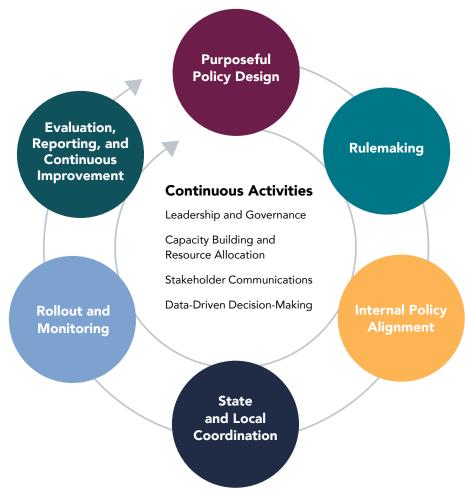
Introduction

State governments enact hundreds of policies a year intended to improve outcomes for students. If these policies were self-executing, the impact on American education would be swift and dramatic, and the system today would look profoundly different than it did just one year ago. But the reality is that how a policy is implemented often affects student outcomes as much (or more) than the policy itself.

Much of this policy implementation is led or influenced by state education agencies (SEAs), which historically held regulatory and compliance-oriented roles. Today, however, state legislatures and federal policies increasingly expect SEAs to take more proactive roles in policy implementation,¹ and some SEAs are embracing this change.

This report offers a new framework to help SEA leaders and staff think about the many facets of implementation. It describes two complementary types of elements: sequential phases of work and continuous activities that flow across those phases. By focusing on the continuous activities, SEAs can strengthen each phase of work and ultimately improve a policy's effectiveness.

Note: Click on each policy implementation phase at right to navigate to its section in this framework.



Six sequential phases outline a policy's progression over time:

Purposeful Policy Design describes the work SEA leaders do alongside policymakers (e.g., executive staff or legislators) to shape legislation, elevate implementation considerations, and embed evidence from the field throughout policy development.

Rulemaking describes the process by which administrators "translate broad mandates into detailed administrative regulations and procedures."²

Internal Policy Alignment describes the integration of a new policy into existing education systems, which includes adaptations to an SEA's programs and practices to ensure coherence across regulatory and operational systems.

State and Local Coordination describes the myriad activities SEAs undertake to organize, inform, support, and offer capacity to local implementers as they execute the daily tasks of change.

Rollout and Monitoring describes the moment a policy goes into effect, as well as the associated activities (e.g., grant competitions or new programs). SEAs also begin data collection to both ensure compliance with regulations and monitor implementation progress.

Evaluation, Reporting, and Continuous Improvement describes the process of assessing a policy's impact to determine whether it had its intended effect, sharing lessons learned, and adjusting the policy and/or implementation accordingly.

During each phase of implementation, four categories of continuous activities guide execution:

Leadership and Governance activities center the vision and priorities that guide execution. Through these tasks, SEA leaders foster coherence, build coalitions both inside and outside SEAs, navigate political challenges, and stay focused on the long-term impact of the policy.

Capacity Building and Resource Allocation activities ensure that implementers have what they need to understand and effectively execute new policies. Capacity refers to people and the time, expertise, skills, and connections they require to carry out implementation.³ Resource allocation includes the funding, technology, and tools that people need to leverage their capacity and fulfill their responsibilities.

Stakeholder Communications activities build multilateral flows of information and engagement. Effective communication builds trust, creates buy-in,⁴ and invites perspectives from people across the education system to identify potential challenges and innovative solutions. Ongoing engagement also facilitates timely feedback and adjustments, increasing the likelihood of success.⁵

Data-Driven Decision-Making activities use evidence to guide balanced, responsive decision-making.⁶ Robust and purposeful data systems allow SEAs to pinpoint bottlenecks, guide capacity and resource allocation, target interventions to those who need them most, and inform real-time adjustments to policy rollout.⁷

While the phases are organized according to their typical sequence, implementation is an iterative process that may see implementers returning to certain phases at different times and cycling through them over time. Policies may also have different starting points and pathways through the phases. For instance, a law enacted via public ballot may have a different implementation trajectory than if it were a legislative bill. Certain elements of the framework may be more or less important depending on a state's political, social, economic, cultural, and historical context, and a state's governance structure will determine an SEA's level of implementation authority.

Regardless of specific state and policy contours, this framework offers guidance for effective implementation so that policymakers, SEA administrators, and technical assistance providers can focus their time and energy on tailoring activities to their unique contexts. The following descriptions of each phase include a table of essential tasks organized by their continuous activity category. These tasks are not "must-do's" or "to-do's" but rather a starting place for customizing implementation to a particular context.

MORE FROM BELLWETHER

CASE STUDY 1

From Policy to Impact: North Carolina's
Implementation of the Science of Reading
illustrates Internal Policy Alignment;
Capacity Building and Resource Allocation;
and Stakeholder Communications.

CASE STUDY 2

From Policy to Impact: Illinois'
Implementation of High-Impact Tutoring
illustrates Leadership and Governance;
Data-Driven Decision-Making; and
Evaluation, Reporting, and Continuous
Improvement.

CASE STUDY 3

From Policy to Impact: Louisiana's
Implementation of High-Quality
Instructional Materials illustrates
Purposeful Policy Design; State and Local
Coordination; and Rollout and Monitoring.

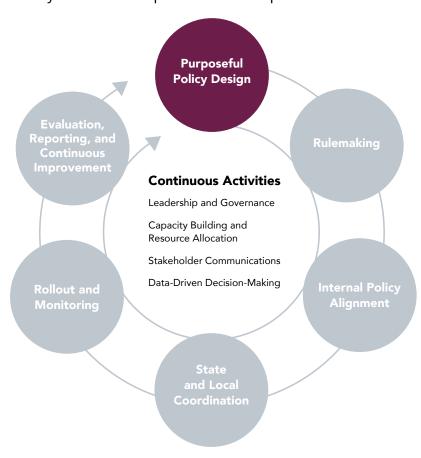
The Policy Implementation Cycle

Purposeful Policy Design

Effective implementation begins with intentional collaboration among executive staff, legislators, and state administrators throughout policy design. SEA leaders are key to helping their partners understand the inner workings of the education system and the potential consequences of

proposed changes. They might shepherd ideas from their agency into law, help a lawmaker refine an ambitious vision, or elevate continuous improvement lessons from existing policies.

SEA leaders' expertise gives them an important role in creating policies with strong theories of action and appropriate incentives based on accurate assumptions about target audiences. As bills move through committee negotiations and floor votes, SEA staff can also help legislators understand and respond to proposed revisions and amendments. Although SEAs do not always lead policy design, there are many ways for leaders and staff to contribute to crafting sound, coherent policies.



"[SEA] leaders may actually be able to influence [a policy] in some way that makes it more coherent, more useful, more impactful for students ... or at least advise a legislator [on] what the agency realistically can and cannot do, or what school districts realistically can or cannot do. For a law to be implemented well, the law has to be written well, which isn't a given. This is one reason why the SEA needs to be at the table. ... In my view it's always better to be at the table, even if it's hard."

—FORMER SEA LEADER, on how SEAs can contribute to purposeful policy design⁸

Essential Tasks for Purposeful Policy Design

Leadership and Governance

Create a clear and compelling vision for a policy's intended impact. SEA leaders, governors' offices, and legislators can collaborate to ensure that the policy agenda includes clearly defined and feasible goals that will serve as the North Star for implementation. ⁹ Ideally, this vision aligns with an SEA's mission and the state's education priorities.

Identify the behavioral changes required at every level of the implementation "chain" — state, district, school, classroom, and teacher or parent — for turning policy into practice. This process might also surface the metrics needed later to determine whether a policy's implementation was successful.

Capacity Building and Resource Allocation

Identify the policy levers and incentives (including mandates, extra funding, public recognition, rulemaking, technical assistance, administrative streamlining, and accountability expectations, among others) that will lead to the intended behavioral changes. Aligning incentives with goals "make[s] the right choice the easy choice" and significantly increases the likelihood of uptake. ¹⁰ Ideally, incentives and levers are aligned all the way from statehouse to classroom. ¹¹

Partner with budget and/or appropriations staff to ensure that funding matches a proposal's priorities and needs. ¹² An open line of communication allows SEAs to both advocate for their needs and ensure that internal resource decisions are based on accurate information.

Stakeholder Communications

Become a credible adviser to legislative and executive leaders such as chairs of legislative education committees, state board of education officials, and staff in the governor's office to improve the coherence, feasibility, and impact of policies. High-quality drafting sets the stage for successful implementation, but, as one former SEA leader pointed out, "legislators with good intentions can [still] write crappy laws." Even when an SEA is not leading policy design, state education chiefs can use their influence to represent their agency's priorities and needs.

Gather constructive advice from stakeholders in structured conversations. Genuine engagement early and often can set the tone for future collaboration with key parties. To ensure that conversations are authentic and productive, keep them specific and focused on a particular question or area of expertise.

Start building coalitions and rallying advocates in support of an emerging vision. Community-based organizations, funders, advocacy organizations, parent associations, district leaders, businesses, labor groups, and other constituencies can be powerful allies.

Data-Driven Decision-Making

Review existing evidence for the proposed intervention to find recommendations for implementation. This might include reaching out to other SEA leaders for lessons learned from their states. Newer interventions may lack robust evidence bases, requiring pilot phases that do not overpromise on outcomes.

Interrogate underlying assumptions that might be influencing policy design. Making assumptions about factors like the level of trust among stakeholders, incentives driving existing behaviors, or the level of knowledge and motivation people have could derail implementation from the start. It is also important to ensure that new policies do not perpetuate negative stereotypes about teachers, students, or others.

Identify metrics that will determine whether a policy is being successfully implemented. These measures should be meaningful, feasible, and easily explained to both lawmakers and the public.¹⁵ Consider whether baseline metrics already exist and can be used to compare changes over time, whether the desired data can be collected, and what funding or capacity the collection process will require.

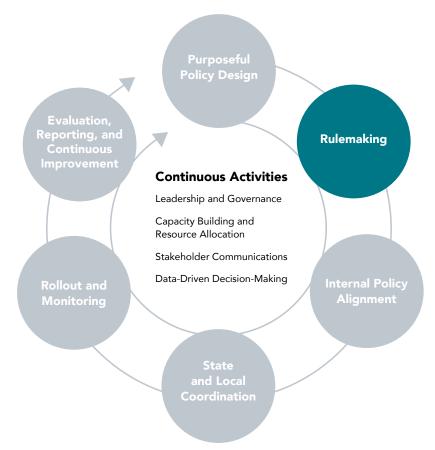
Rulemaking

In rulemaking, SEAs craft the administrative procedures that determine the details of a policy. Formal rulemaking facilitates public awareness and input, helps SEA staff gather pertinent information, creates an administrative record, and "allow[s] a full and fair analysis of the impact and validity of a proposed rule." ¹⁶ Certain policies may be exempt from formal rulemaking, ¹⁷ but new policies typically still necessitate shifts in regulations and administrative procedures — essentially, informal rulemaking.

Whether formal or informal, however, the intense stakeholder engagement in this phase helps leaders "[make] sure the key message and logic of the policy are transmitted correctly," while also allowing practitioners and intended beneficiaries to provide input and voice their concerns. Rulemaking is therefore a valuable tool that offers SEAs an opportunity to consider the realities of implementation from start to finish.

"Rulemaking is hard, and as a result many aren't taking advantage of its power, but [leaders can] use rulemaking more often as a compass to point to effective implementation."

—FORMER SEA LEADER, on the potential of rulemaking as a tool for SEAs¹⁹



Essential Tasks for Rulemaking

Leadership and Governance

Determine the level of rulemaking required. Legislators often leave certain details to be determined in rulemaking, which "add[s] pressure to ... ensure [the policy's] practicality." ²⁰ The more details that need to be ironed out, the lengthier the rulemaking process needs to be.

Center the policy's vision and goals throughout rule development. It may be easy for SEA staff and public commenters to get lost in the details; it is leadership's role to ensure that proposed rules and changes truly further the policy's intended goals.

Capacity Building and Resource Allocation

Ensure rulemaking staff have appropriate expertise to be able to consider the implications of proposed rules. A "nuanced understanding" of decisions and their downstream impact can avoid unintended consequences later.²¹

Engage experts who have the technical knowledge to "[convey] the intent or spirit of the original policy" and build rulemaking staff's understanding of the research.²²

Stakeholder Communications

Reach out to key stakeholders beyond a formal notice to the public. Some stakeholders may not be aware of the opportunity to give input, have the time or resources to provide input, or be motivated to offer input. Outreach can help ensure that valuable perspectives are not missed, whether gathered via formal or informal channels.

Commit to transparency by clearly outlining the steps an SEA will take and where a proposed rule is in the process.²³ Consider responding to public comments to demonstrate that input was heard. Proactive, authentic responses build trust and goodwill for a new policy as well as increase opportunities for meaningful engagement in future rounds of policymaking.

Data-Driven Decision-Making

Track the potential administrative burden for both the SEA and the intended audience (e.g., districts) using metrics such as the number of rules, pages, or forms.²⁴ A high administrative burden for implementers will slow implementation by discouraging uptake and compliance.

Consider ways to integrate metrics and/or data collection into rules to signal the elements of a policy that are nonnegotiable. Even if they do not make it to the final regulations, draft protocols for data collection, analysis, and usage can help rulemakers think through the steps of implementation and consider the practical implications of proposed rules.

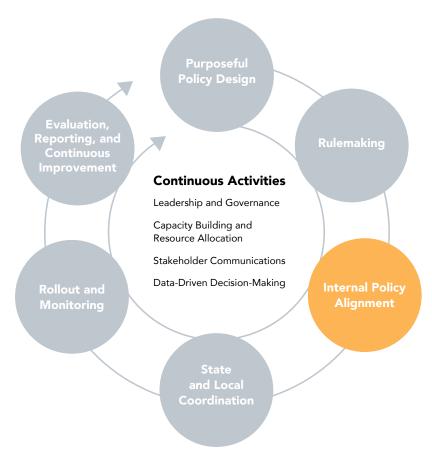
Internal Policy Alignment

This phase combines two related strands of work. The first is aligning all relevant internal departments, administrative processes, and staff members along the same goals, objectives, and outcomes of the new policy. The second strand of work is aligning new policies with existing policies and systems. By their nature, new policies often conflict with or even run counter to the goals of existing policies.²⁵ Integrating new requirements into extant structures and reconciling conflicting regulations can ensure coherence with

other initiatives. Ideally, some early internal policy alignment will already be underway, but in this phase changes continue and accelerate.

"It's critical that states align their work across their own agency. ... The chief and the cabinet must agree on the top priorities, identify all the places across the agency where these priorities get enacted, and make sure that not only their communications but [also] their policies are aligned to the priorities. Too often, districts get mixed messages from different parts of the agency, enabling that tried-and-true behavior, 'Well, Mom didn't tell me the answer I wanted to hear, so I'm going to ask Dad.""

—IMPLEMENTATION EXPERT, on the importance of internal policy alignment²⁶



Essential Tasks for Internal Policy Alignment

Leadership and Governance

Identify and empower a leadership team. Leaders might consider forming a new working group, steering committee, organizational chart, or role profile but should be mindful that each team member needs the authority and ability to enact changes internally and externally.

Create and reinforce a governance structure that will last beyond one champion. While strong leadership is key, infrastructure and succession planning should account for both expected and unexpected transitions. For example, a former SEA chief advised attributing policy victories "to the person who's staying in the room." 27

Develop an implementation roadmap with priorities, milestones, benchmarks, and contingency plans. This plan creates clarity and visibility regarding "who is supposed to implement what, and who is responsible in case [something] goes wrong."28

Foster a culture of accountability through simple mechanisms like monthly check-ins among leadership to monitor progress and problem-solve collaboratively. SEA leaders should hold themselves accountable to set examples for their teams.

Capacity Building and Resource Allocation

Use strategic priorities to assess and allocate existing talent and resources. When an SEA is constrained, assess whether current allocations align to the policy agenda's priorities. Gaps or inefficiencies might be opportunities to find capacity in unexpected places.²⁹ The strategic priorities should also guide the process of seeking and securing new resources to avoid haphazard "firefighting."

Seek resource flexibility across funding streams through blending, braiding, or leveraging philanthropic funds. Where funds are linked directly to particular staff or initiatives (e.g., federally funded positions), consider distributing responsibilities so that the funds can be distributed as well.³⁰

Supplement capacity with external resources. Consider "borrowing strength" from existing systems through partnerships with nonprofits, institutions of higher education (IHEs), other state agencies, and early adopters.³¹ Peer networks can support state leaders and provide staff professional development, building a talent pipeline for continued strong implementation.

Stakeholder Communications

Invite career staff to share their perspective on a new policy. This is particularly important if the policy is controversial or unpopular; rather than reinforce a begrudging compliance culture, SEA leaders should help their staff make the most of an initiative.³²

Create an internal communications plan so that messaging is consistent and critical information gets to the right people. This may require intentionally breaking silos and hierarchies. Many teams "rely on informal processes," but those can be easily disrupted by crisis or turnover.³³

Test the implementation plan with staff to better understand what implementation steps may look like in practice. Staff may be able to identify conflicting regulations, duplicative information, incompatible timelines, and other obstacles not easily visible to leadership.

Decision-Making

Embed data collection and evaluation plans as early as possible. By planning with an eye toward evaluation, SEA leaders can ensure access to the relevant data they will need to evaluate the policy's implementation and effects on intended outcomes.

Assess existing data and reporting systems to understand where new metrics or requirements can be integrated rather than building new infrastructure.³⁴ This may include integrating financial data to understand the return on investment for state dollars³⁵ or drafting data-sharing agreements with other entities to connect siloed sources.³⁶

Streamline reporting systems and accountability processes to minimize administrative burden and align the timing and sequencing of reports and decisions. If the process is difficult and the data does not visibly impact decision-making, implementers will not view reporting as valuable.

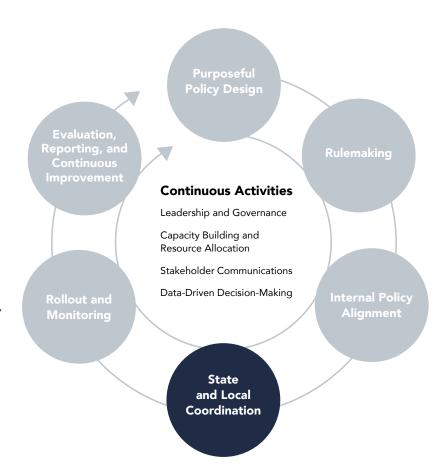
State and Local Coordination

The day-to-day work of implementation is typically driven by local practitioners, with SEAs acting as coordinators for the wider education system. Throughout this phase, SEAs work with local education agencies (LEAs), IHEs, community-based organizations, advocacy groups, and labor groups, among others. SEAs act as a central hub of information and offer implementers additional capacity to do the higher-order work that might otherwise get lost in everyday tasks.

For example, an SEA might conduct information campaigns, connect new partners, offer technical assistance, reduce administrative burdens, or facilitate statewide learning networks. By coordinating these activities across the state, SEAs can assist implementers and ensure a smoother, more cohesive implementation process.

"[People often bring] the assumption that districts understand what they were being asked to do and the reality was that they didn't. ... The fact that the law passed and then there was an article written about it or a postlegislative roadshow is not enough. The consistency and repetitiveness of communication about what's coming, I think, is super in the agency's control and just an underutilized tool."

—FORMER SEA STAFF MEMBER, on the agency's role in state and local coordination³⁷



Essential Tasks for State and Local Coordination

Leadership and Governance

Establish a regular cadence of communications to keep attention on policy priorities and avoid mixed messages.³⁸ Communications should be consistent and easily digestible while also reinforcing the state's commitment to the initiative. A former state chief explained, "If you don't have a tight sense of what this project is ... it rapidly dissipates because other folks will assume that this, too, will pass."39

Continue drumming up support from influential policymakers, advocates, and grassroots actors. Constant communication attracts new supporters, renews ties with existing ones, and safeguards against leadership changes. Support from local influential organizations, politicians, and businesspeople could also help "favorably sway ... parents and the general public." 40

Engage those typically not at the table, such as the social services sector, health systems, or the juvenile justice system. Education policies often intersect with other sectors in ways that are not immediately visible, so seeking new perspectives is critical to fully engage a community.⁴¹

Anticipate blowback and prepare a coalition of support. Some pushback might be nominal, or what one former state chief called "tissue paper." 42 Stronger opposition might require equipping staff and supporters with talking points or other resources for resilience.

Capacity Building and Resource **Allocation**

Disseminate practical resources such as templates, models, research-based guides, and checklists that highlight how local implementers might innovate or tailor their approach for their context. 43 Collaborating with local administrators to create these can also accelerate rollout and clarify alignment with existing policies or perceived conflicts.

Offer technical assistance tailored to an LEAs's particular context. One expert noted that early, middle, and late adopters of a new policy each need different types of assistance. 44 District leaders have found valuable support through peer cohorts and partnerships with outside organizations, ⁴⁵ which SEAs can facilitate through statewide learning networks, intermediaries, or regional offices.

Remove procedural barriers, especially for procurement. SEAs can provide request-for-proposal language, negotiate contracts, establish criteria, provide budget suggestions, disseminate resources, or apply pressure to contractors such as technology providers or publishers. 46

Stakeholder Communications

Incorporate opportunities for authentic external engagement. Consider relevance, timing, costs, cultural appropriateness, and accessibility for different stakeholders. ⁴⁷ For each forum, one expert suggested setting limits on the discussion; not every issue requires everyone's input. A "constrained constructivism" approach could instead facilitate more relevant, productive, and meaningful conversations.

Identify champions (and dissenters) early on. Champions — and particularly those who are early adopters — can provide an example of success and a compelling rationale for others to follow. 48 Conversely, identifying dissenters allows leaders to strategize for potential obstacles.

Celebrate victories and strengths to rally supporters, promote a narrative of forward momentum, and bolster a policy's long-term sustainability. As one expert said, "People like victories, so if they're winning on an initiative, they'll want to go on winning."49

Data-Driven Decision-Making

Promote the evidence base for the new policy. While advocates and policymakers have been steeped in the details and "why" of a policy, the information is often new to the public. SEAs can publicize research findings to minimize misinformation and demonstrate a policy's rationale.

Track, analyze, and report community feedback to capture and follow up on trends. Follow-ups from SEA leaders show communities that the agency is doing more than just a "listening tour." 50 One expert advised saying, "This is what I heard last time, this is what we did, and this is what we can't do."51

Rollout and Monitoring

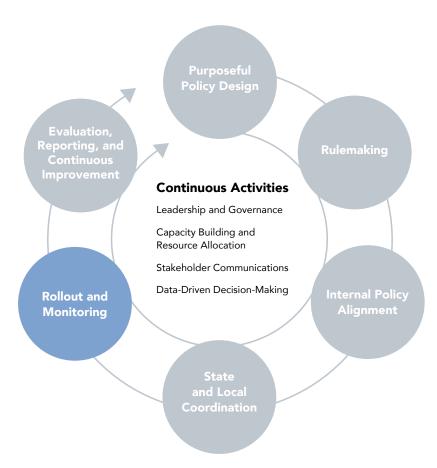
Rollout is the transition from policy to a practical reality. Little attention is paid in the literature to the moment when a policy goes into effect because certain activities may overlap with previous phases. However, this threshold of change deserves its own phase, as SEAs must oversee the shift and conduct associated activities (e.g., running grant competitions, disbursing money, and/or reviewing district plans). At the same time, staff also begin collecting data to ensure compliance with regulations and monitor

a policy's implementation progress. While this monitoring data might also support accountability or evaluation later, its main purpose is to determine whether policy rollout is on track or needs to be adjusted. Ideally, the previous four phases have helped an SEA prepare for

a smooth rollout, such that implementers can now focus on adhering to their plans and keeping an eye out for adjustments.

"Implementation is about details, details, details. ... I'll never forget the experience of sitting next to [an SEA chief]. There were 114 different elements [in their implementation plan]. ... It included exact responsibilities of individuals in her team, measured against timelines with identified outcomes, with coursecorrection windows, communications with the legislature, with the governor, and the press. I mean, it was deeply thought out at a granular level."

—FORMER SEA CHIEF, on an exemplar of progress monitoring⁵²



Essential Tasks for Rollout and Monitoring

Leadership and Governance

Review rollout progress on a regular cadence so that new developments do not catch leaders unaware. Being able to respond to developments in a timely manner can help implementers capitalize on successes and address obstacles immediately.

Manage expectations and timelines as progress continues. Unexpected developments might stall or accelerate implementation unevenly.

Capacity Building and Resource Allocation

Build the SEA's capacity to use data to monitor progress. Many SEAs do not have "defined, dedicated research or analysis capacity,"so leaders must determine what is possible internally and where partnerships or new technology can add capacity.⁵³

Build local implementers' data capacity to help them understand their own progress within the statewide picture. Tailored progress reports and check-ins that walk through data trends can foster a sense of shared responsibility and accountability as well as build local implementers' ability to share accurate information with their constituents.

Monitor the use of resources according to the strategic priorities identified during Internal Policy Alignment. Flagging anticipated gaps in resources will allow leaders to address them immediately or seek assistance before local implementers are impacted.

Stakeholder Communications

Create formal channels and routines to gather feedback. Formal channels ensure that feedback does not inadvertently get lost before it reaches decision-makers, and routine collection (for example, post-webinar surveys) allows SEA staff to analyze trends over time.

Document and share intermediate results through press releases, blogs, case studies, and data dashboards, among others. Keeping stakeholders who are not involved in day-to-day implementation informed can maintain enthusiasm and support. Transparent information, especially about successes, can also help to "counter hostile narratives" or prevent misinformation.⁵⁴

Data-Driven Decision-Making

Continually update reports and/or dashboards to facilitate transparent decision-making. Building an evidence base is key to ensuring that decision-making can be both timely and proactive.

Conduct disaggregated analyses from time to time so that leaders can keep a pulse on potential inequitable trends. Identifying those early is critical to addressing them and lessening the potential for harmful impact.

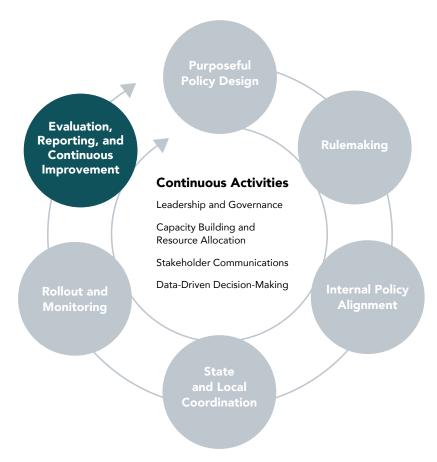
Ground implementation changes in both feedback and evidence. Implementers may shift to appease one constituency and inadvertently create another issue elsewhere. SEA leaders must balance feedback with trends in data to address concerns while protecting the original policy vision. Changes to data collection processes in particular create implications for later evaluation and must be considered carefully.

Evaluation, Reporting, and Continuous Improvement

This phase allows an SEA to learn from the implementation process and determine whether a policy is meeting its intended goals. Evaluation, which typically involves formal studies with research partners measuring student outcomes, assesses a policy's implementation fidelity, overall effectiveness, and ongoing or long-term impact. Results can then be shared publicly to facilitate

learning among local stakeholders, the public, and other states. Evaluation results also inform continuous improvement discussions, in which leaders consider changes to the policy or its implementation activities.

Despite coming last in this framework, this phase does not signify the "end" of implementation. Certain improvements might be made internally, sending implementers back to the Internal Policy Alignment phase. Significant changes, such as scaling a pilot statewide, might see SEAs draft recommendations to policymakers, which restarts the cycle with Purposeful Policy Design. Ultimately, the goal is for implementers to learn from the implementation process and apply those lessons to move the policy closer toward achieving its intended goal.



"I had a superintendent say, 'We did 10,000 classroom observations this year.' And I asked, 'And what then? What did people see? And what did they do with what they saw?""

—IMPLEMENTATION EXPERT, on the importance of continuous improvement⁵⁵

Essential Tasks for Evaluation, Reporting, and Continuous Improvement

Leadership and Governance

Manage expectations of evaluation and continuous improvement efforts to avoid misunderstandings or predictions of a policy's impact. Overpromises to or from legislators, executive policymakers, and funders, among others, could lead to unintended consequences or controversy.

Track and facilitate evaluation and continuous improvement efforts. Evaluations may take several months but can be accelerated by sharing data, making interview connections, and ensuring that systems are updated. Tracking timing is also crucial for continuous improvement; adjustments to a policy typically make the most sense before a key date like the start of the school year.

Capacity Building and Resource **Allocation**

Partner with researchers to ensure that research designs are sound, feasible, and aligned to the policy's vision and goals. SEAs typically do not have many staff dedicated to policy evaluation, but local IHEs, nonprofits, or intermediaries can provide expertise to advise and/or conduct evaluations.

Cultivate an internal culture of continuous learning by providing professional development, highlighting successes, and encouraging creative lines of inquiry. Because SEA staff directly coordinate with local systems, their expertise is essential to facilitating system-wide continuous improvement.

Build local systems' capacity for continuous learning by facilitating data-sharing, building central dashboards, sharing tailored reports, reducing data redundancies, streamlining data management, ⁵⁶ and coordinating to remove barriers for evaluators. Even large districts with robust existing systems will still benefit from integration with state and/or longitudinal data, as well as assistance with analyses and reporting.⁵⁷

Stakeholder Communications

Tailor reporting to different audiences to translate evaluation results into relevant and familiar language. Researchers might detail the intricacies of methodology, but policymakers are focused on understanding broad impact, and parents want to know what will change in their child's day-to-day.

Be precise in reporting results to avoid inadvertently supporting biased narratives. Policies that intersect with topics such as home language diversity, achievement gaps, discipline, and more can be fraught with stereotypes or narratives that do not reflect reality or do not serve students. Choosing language carefully and contextualizing data and analyses can get ahead of potential misjudgments.

Data-Driven Decision-Making

Disaggregate data to find where a policy might be disproportionately impacting students. For example, aggregated racial categories such as "Asian" or "white" might hide the very different experiences of Southeast Asian or Middle Eastern students. Other examples include analyzing outcomes by ZIP code rather than just income level, or cross-referencing demographics such as gender with participation in programs such as career and technical classes. Finding and investigating disparities can elevate successes and disrupt potential harms.

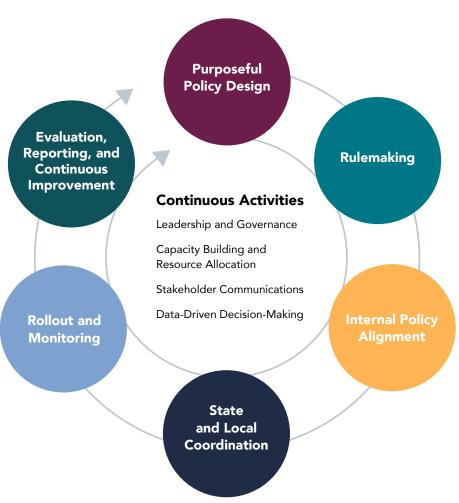
Broaden evaluations to include multiple data sources where available. SEAs are "uniquely positioned to drive system-wide continuous improvement" via the wealth of student, teacher, school, program, financial, and performance data they often collect.⁵⁸ Using this data to its greatest potential can inform future decision-making regarding resource allocation, as well as future legislative and agency priorities.

Include qualitative evidence for a holistic evaluation that captures the experiences of students, teachers, and other policy targets. While quantitative metrics are crucial, some worry that aggregated data can depersonalize and dilute the implications of a policy's impact. One expert suggested, "Pick one student whose outcomes you especially care about and partner with them to trace their experiences during implementation. ... [This] will likely reveal intended and unintended consequences [that may be] invisible in the aggregated and disaggregated test scores and other quantitative measures."⁵⁹

Conclusion

Education policy implementation is a complicated process that requires careful planning, coordination, and execution across several levels of the education system. The framework presented in this report aims to capture that complexity in a single model that is structured yet flexible enough to allow SEA leaders and staff from any state to organize their planning throughout an implementation cycle.

As research continues to evolve, this framework may be refined and expanded. There are many contextual factors not included here, and many decisions are still in the hands of SEA leaders who know their state's circumstances best. In the meantime, this framework offers a roadmap to assist policymakers, SEA administrators, and other stakeholders in navigating the complex landscape of education policy implementation, with the ultimate goal of increasing policies' chances of achieving their intended impact for students. ◆



Endnotes

- Betheny Gross, "The Sleeping Giant Awakes: To Focus on School Performance, State Departments Must Adapt," Center on Reinventing Public Education, October 2012, https://crpe.org/commentary-the-sleeping-giant-awakes-to-focus-on-school-performance-state-departments-must-adapt/.
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About Bellwether

Bellwether is a national nonprofit that exists to transform education to ensure systemically marginalized young people achieve outcomes that lead to fulfilling lives and flourishing communities. Founded in 2010, we work hand in hand with education leaders and organizations to accelerate their impact, inform and influence policy and program design, and share what we learn along the way. For more, visit bellwether.org.

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