Constructing Policy: A Framework for Effective Policy Implementation

by

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The purpose of this paper is (a) to articulate key features of effective educational policy implementation, (b) to define the theoretical category of policy intermediaries and (c) to provide preliminary examples of specific strategies and processes that policy intermediaries might use to facilitate the implementation of policy in complex environments. Building upon the premise that policy implementation involves both linear and recursive processes across the multi-tiered education system, this paper offers a research-based framework for policy implementation that school-, district-, and state-based educational leaders, whom we call 'policy intermediaries', use to facilitate effective policy implementation. The theoretical basis for the framework is drawn from a review of the literature on policy implementation, complexity, and change theory as well as our own experience studying and supporting policy intermediaries. The framework is presented as a guide that can be used by individuals involved as intermediaries in the process of policy implementation (i.e., those on the policy implementation chain who stand between policy originators and classroom practitioners). We recognize the complexity and immediacy of policy implementation and the importance of intermediaries as constructive learners of education policy and thus as modifiers and adaptors of policy as they convert their learning and understanding to action.

Keywords: Education policy, intermediary, implementation, sense-making, situational awareness, procedural knowledge.

Introduction

Policy implementation research, and in particular education policy research, has run the gamut from macro-level and top-down analyses focusing on how organizational and bureaucratic norms and constraints influence policy implementation, to micro-level analyses highlighting the role of the individual actor as an interpreter or sense-maker in the process of policy implementation (Spillane et al., 2002). Over the past 30 years, various attempts have been made to unite these different approaches, although a broadly satisfactory solution has yet to present itself. Also lacking from the implementation literature is a research-based framework that applies to that large and heterogeneous population of education workers who don't fit well under the label of either policymaker or practitioner. Although a wealth of advice has been directed at individuals who are asked to implement policy, the bulk of that advice is either incomplete or misplaced without a research-grounded understanding of what the role of the policy intermediary actually entails.

Much of the difficulty faced by theorists attempting to unite macro and micro models of policy implementation has to do with the emphasis placed on developing explanatory frameworks that can be used to analyze the process of policy implementation. As McLaughlin (1987) points out, a single model of analysis has difficulty explaining macro- and micro-level phenomena. Rather than get caught in this explanatory dilemma, it is our position that the growing body of research on policy implementation should be used to support the development of mechanisms and strategies that promote effective policy implementation instead of developing explanatory or predictive models of policy implementation. To this end, this paper sets forward a framework for effective policy implementation.

The theoretical framework for this paper integrates two related, but not frequently combined, perspectives. First, our study draws heavily on the education policy implementation literature. Specifically, we align our work with the findings of the 'third generation' of policy analysts (McLaughlin 1987), who have focused on the role of individual actors and the interpretations made by those actors, as the basis for understanding how individuals come to understand, make sense of, and act upon various policy messages. Second, we integrate the literature on change theory—specifically those studies focusing on the complexity and interplay among different

levels and organizations within (as well as related to) the educational system—with policy implementation findings to formulate our understanding of policy intermediaries as essential players in the process of policy implementation. Policy intermediaries are individuals who play active roles in helping individuals at different levels of the education system make sense of policy, reconcile policy with other policies, and then create shared understanding of the content of policy messages. Thus, we present as a core tenet of our framework that policy needs to be crafted not only with anticipation of adaptation among policy implementers, but also with the knowledge that there is an important, and many times overlooked, role for policy intermediaries to play in this process. The intermediary is a vital communicating and coordinating cog who, in this role, uses specific skills, processes, and knowledge to support the construction and implementation of education policy.

Section I depicts the theoretical lens through which we frame the problem of effective policy implementation. *Section II* presents a framework for effective policy implementation based on literature review and the theoretical lens presented in *Section I*, focusing primarily on the role of the policy intermediary as a critical support element for effective policy implementation.

Section I
Theoretical Lens

There are two elements to our theoretical framing of the process of policy formation and implementation. The first element focuses on the *role of the individual* in the process of policy implementation. From a cognitive perspective, we understand that individuals go through a process of understanding and interpretation, or "sense-making" (Spillane et al., 2002, Weick, 1995; Klein, 2001), when faced with the content of a policy message that they are asked to implement. Further, we use bounded rationality theory, and the concept of "situational awareness" (Weick, 1995; Leedom, 2002) to understand how individuals move from the sense-making process to take action and implement (or not implement) a given policy message within a complex educational environment. Finally, we concur with Geertz (1973) that humans operate within webs of significance that are socially created. Thus, cultural factors regarding what it means to be, for example, a state-level program coordinator or a district-based data specialist are internalized by the individual and become salient to how they interact with others.

The second element focuses on our understanding of the *complex environment*—the multi-tiered education system—that policy intermediaries are situated within and that constrains, confuses, and/or promotes the actions that individuals take during the process of policy formation and implementation. Understanding how meaning is constructed and then acted upon in complex environments (such as schools, districts, and state departments of education) leads to a synthesis of micro-level models of policy implementation (focusing on the role of the individual) and macro-level models that focus primarily on the influence of organizations, bureaucracies, and systems on the policy implementation process. Through our analysis of the role of the individual as a sense-maker who takes action in a complex educational environment, we understand policy formation, implementation, and reconciliation to be iterative and recursive, involving mutual adaptation and interpretation among actors across the educational system. As a result, policy formation oftentimes loses its coherence (because the communication among individuals within the education system is either nonexistent or ambiguous), and policy implementation tends to fragment both across the system and, in many cases, from one teacher to another within a single school.

Individual as Sense-Maker

The growing body of literature on education policy implementation argues that implementation at the level of the individual is largely a function of ongoing interpretation, negotiation, bargaining, managing ambiguity, discretion, and sense-making that occurs among individual actors at each level of the educational system (McLaughlin, 1997; Calista, 1986; Honig, 2001; Elmore, 1980; Spillane, 1998; and Goggin et al., 1990). Individuals, viewed through this perspective, are autonomous actors who take action based on decisions made through contextualized interpretation and negotiation, thereby effecting how a given policy is implemented. Policy is almost never implemented as intended (assuming that the policy has a coherent intent); rather, policy implemented in the field is a result of repeated interpretations and local appropriations (Levinson & Sutton, 2001) that take place at multiple levels of the education system and among individuals and organizations that have multiple entry points into the system (e.g., teachers unions, foundations, policy think tanks, community based organizations). Recognizing that policy messages are continually interpreted within and across the multi-tiered educational system, including through individual and organizational parameters (e.g., organizational norms, institutional values, individual mental schema, and other constraints), forefronts the critical role of those at the interstices of the process of policy formation and implementation.

Elmore's (1980) discussion of "discretion" draws attention to the individual as a critical player in the implementation process. Individuals, in Elmore's view, are able to exercise discretion when faced with a policy message. Discretion, for Elmore, is an "adaptive device" that individuals use to understand and act upon policy. As a result, the policy that is implemented in the school or the classroom is necessarily a product of the individual's own understanding of the content of the policy message rather than a logical realization of the policy as designed or intended. Further, Elmore argues that individual discretion combined with the bargaining that takes place among individuals and organizations (typically between those in charge and subordinates) might be better understood "…as a device for improving the reliability and effectiveness of policies at the street level" (Elmore, 1980, p. 610). This second claim is crucial because it means that moving away from the original parameters of the policy is not automatically a deleterious response on the part of the policy implementers. The capacity of individuals to contextualize policy messages

can be an asset rather than an obstacle to be overcome through, for instance, increased regulation and prescriptive policy content.

McLaughlin clarifies the role of the individual actor in policy implementation by pointing out that, in addition to factors such as local capacity, individual will (or motivation), and the system of supports and pressure impacting policy implementation, individual interpretation of policy dramatically influences how a policy is implemented (McLaughlin, 1987, pp. 174-175). More profoundly, individual interpretation not only leads to variance in how policy is implemented, but the policy itself is transformed "at each point in the policy process…as individuals interpret and respond to it" (p. 174). Datnow et al. (2002) make a related point when they suggest that both educators and researchers need to better account for the inevitable "co-constructed nature of the implementation process" (p.10). By focusing on the individual actor, and the "individual incentives, beliefs, and capacity" of individuals, McLaughlin highlights the limitations of macro- and micro-analysis, neither of which are capable of explaining policy implementation in a complex system composed of multiple tiers with many actors and, often, multiple organizations. The role of the "third generation" of policy analysis, as McLaughlin calls it, is to develop frameworks of policy implementation that address the entire system and are able to explain the dynamics and complexity of policy implementation. To do this, the policy analysis must move beyond purely macro or micro levels of analysis. Instead, it must focus on the interplay of actors (inclusive of federal policymakers and classroom teachers) in a complex system and how this interplay impacts and relates to the construction and implementation of policy.

Spillane, Reiser, and Reimer's (2002) recent work provides an excellent synthesis of the implementation literature and a useful framework for understanding and studying how individuals understand the content of policy messages in the implementation process. They argue that the sense-making process involves individual cognition and situated cognition. Individual cognition refers to the processes of understanding, interpretation, and filtering of the policy messages that the individual goes through in order to internalize and make sense of a given policy. An individual's conceptual lens, or filter, defines how an individual perceives the relationships among different concepts and is based on his or her prior knowledge and experience engaging in practices related to those concepts (Spillane et al., 2002). Situated

cognition recognizes that the individual sense-making process necessarily occurs in a social setting and that setting influences how the individual makes sense of a given policy. Supported by recent critiques of rational choice theory (e.g., see Douglas & Ney, 1998 or Gigerenzer & Selton, 2001), situated cognition argues that the individual actor and the context in which that actor exists are intertwined, so that the situation in which an actor interprets policy messages is "… a constituting element in that process"(p. 389).

The *Cognitive Framework of Implementation* outlined by Spillane et al. (2002) provides much-needed insight and clarity into the process that individuals go through when faced with new reform initiatives and policy regulations. Given the current context of school reform in the United States and the substantial implementation requirements posed by the No Child Left Behind Act of 2001, Spillane et al's framework provides a useful means to analyze school- or classroom-level changes, as well as suggestions regarding the need for learning opportunities that facilitate sense-making and, ultimately, instructional change at the classroom level. Coburn's (2001) use of the sense-making framework to analyze the implementation of reading policy in one California school demonstrates the utility of such a framework. Further, the importance of sense-making as it relates to a teachers' ability to undergo "transformational understanding" (what Coburn calls "deep engagement") is critical as current educational reform policy increases its demand that teachers make substantial changes to their instructional strategies and teaching practice. Coburn found that teachers in the same school, even when engaged in discussions with each other, oftentimes came to different understandings of the same reading policy, resulting in differences in classroom instruction and variance in how that reading policy was implemented in a single school.

Not withstanding the excellent points made by Spillane et al. (2002) and Coburn (2001), their work provides only a partial picture of the issues involved in policy implementation. Specifically, Spillane et al. do not take on the overall complexity of the educational system and the effect that this complexity has on the communication and understanding of policy. Sense-making, we argue, not only takes place within schools and at the individual level, but across the multi-tiered educational system and across different stakeholder groups as well. Spillane et al. and Coburn also do not follow up substantially on the important issue of how the interpretation

of policy by individuals at the school-level, for instance, can impact district and state decisions and lead to a reformulation of policy. In order to understand how the interpretation of policy can impact the formulation of policy across the system, policy must be seen as evolving and constantly renegotiated as individuals interpret and then take action based on their interpretation of policy. This "appropriation" of policy (Levinson & Sutton, 2001) is action oriented rather than static, highlighting the dynamic nature of policy implementation and the possibility that individual experience and situational expertise can be used to inform and create effective policy.

Spillane et al. (2002), Elmore (1980), and McLaughlin (1987) each in their own way hint towards a more proactive role that policy implementation analysts (and also, we would argue, policy implementers) can take. For Elmore, being proactive involves treating individual discretion as an asset, with the idea that policy can be structured to utilize individual, or in-the-field, knowledge as a key component of policy construction. For McLaughlin, being proactive means that policy analysts must be able to learn from their experience, which "…requires moving away from a positivistic model to a model of social learning and policy analysis that stresses reflection and assistance to ongoing decision-making" (McLaughlin, 1987, p. 175). Spillane et al. echo this argument, pointing out that "there is a critical need to structure learning opportunities so that stakeholders can construct an interpretation of the policy and its implications for their own behavior" (p. 418). These authors draw attention to the iterative communication processes involved in policy implementation, in that the content of policy messages are shared and interpreted within and across many multiple levels of the education system.

Goggin et al's (1990) use of communication theory, as applied to the field of public policy analysis, focuses on the transmission of the policy message across multiple levels of the policy system. To Goggin and colleagues, explanations of implementation variability are found in the nature of the communication of the policy message—specifically in the legitimacy and reputation of the sender. This added dimension—the communicator of policy—provides a mechanism though which the proactive suggestions of Elmore (1980), McLaughlin (1987), and Spillane et al. (2002) can be incorporated into the process of policy formation and implementation. If attention is given to how a policy message is communicated, then local

discretion, interpretation, and appropriation become an active part of the system rather than obstacles to be overcome.

Missing still from the body of literature presented above is a theoretical framework that explains how humans move from interpretation and sense-making to action and decision-making in a complex environment. What converts knowledge and understanding to impetus and action? Bounded rationality, as presented below, provides a theoretical construct that explains individual decision-making as an integrated component of the context and environment within which the actors make decisions, effectively bridging the divide between top-down macro-analysis and bottom-up, micro-analysis.

Bounded Rationality

> "Rational man" was one of the first casualties once analysts turned their attention to issues of policy implementation. (McLaughlin, 1987)

> Much of the collective effort of policymakers, researchers, and administrators is aimed at making the school conform to the rational model. We then bemoan the fact that the schools fail to conform to the model. It just may be that we need a new paradigm. (Wise, 1984, p. 86)

Implicit in much of the literature on policy implementation is the assumption that individual actors (from policymakers to classroom teachers) act rationally, in that that they make choices within constraints to obtain the results they desire. To their credit, McLaughlin (1987) and Spillane et al. (2002) break this myth, focusing instead on situated cognition and individual interpretation as critical elements of the policy implementation process. An emerging body of research on bounded rationality makes claims about how individuals make decisions and then act upon those decisions in complex environments. Bounded rationality theory provides added depth to Spillane et al's concept of situational cognition and bridges the divide between micro and macro policy implementation analyses.

Bounded rationality theory argues that rational choice theory makes unreasonable assumptions about an individual actor's capacity and access to the "knowledge, time, attention, and other resources" in real-world settings (Gigerenzer and Selton, 2001). In general, bounded rationality criticizes the rational choice principle of rationality. Bounded rationality asserts that human

actors almost never know all the information they are assumed to know by rational choice theorists, let alone possess the intellectual capacity (or time) to calculate a fully rational or optimal decision (Selton, 2001). Constraints are not simply independent variables in a rational actors' decision-making process; instead, constraints stop individual actors from engaging in a rational decision-making process as defined by rational choice theory. In bounded rationality, individual actors do make rational (with a small 'r') decisions, in that they try to figure out the best course of action in a given situation. But, this decision-making process is better understood as a situational process wherein individuals use heuristics—an adaptive toolbox—and previous experience to adapt and respond to situations and make appropriate and, thus, rational decisions. Situational awareness is defined as the "capacity to act effectively in a given specific situation" where individual actors make decisions using non-optimizing procedures (heuristics) closely linked with particular situations (environments) and their prior knowledge of similar situations to inform the decision-making process (Gigerenzer and Selton, 2001, p. 42).

The concept of bounded rationality, in contrast to the rational choice model, conceives of individual rationality as continually changing, with actors adapting to external situations and building and refining their ability to use heuristics based on past experience. Rationality is co-constructed in particular situations based on an individual's past experience, internalized heuristics, and a constantly shifting and interpretive view of the situation in which a decision is to be made. For bounded rationalists, the criteria of rationality stays constant, but the expression of rationality by individual actors varies depending on the situation and the heuristics applicable to that particular situation (Klein, 2001).

Bounded rationality, when applied to the literature on policy implementation, clarifies and adds depth to our understanding of how individuals act when faced with new policy initiatives and reforms in complex environments. Bounded rationality integrates, in a manner similar to Spillane et al. (2002), the individual decision making process and the context in which that decision is made (e.g., situational cognition and situational awareness), so that separate micro (individual) or macro (system or organizational) perspectives can be reconciled. Bounded rationality closes the theoretical gap between micro- and macro-analyses, in that an individual is conceived of as a social person, as a "…transactor engaged in complex, external exchanges with the environment

and with other persons." The focus here is not on the person but on "…the exchange between persons" (Douglas and Ney, p. 61).

Also, bounded rationality perceives human adaptability and experience as assets to be built upon and used as resources. When public policy is based on the premise that human beings are individual, isolated, and sufficiently informed rational actors maximizing their self-interest (i.e., the traditional top-down approach to policy implementation), the chance that a particular policy will be implemented as intended declines sharply. More crucially, policy designed from such a perspective fails to grasp the opportunity to utilize the experience and brainpower of the very individuals asked to implement the policy. Ultimately, bounded rationality contends that individuals learn from past experience and refine their heuristics (or adaptive toolbox) to be able to make more efficient and informed decisions in the future. From such a perspective, individuals are capable of learning (or unlearning) skills and obtaining experiences that will help them to become more effective sense-makers and implementers of education policy. Bounded rationality provides hope, in that individuals can learn from experience and not be bound by failed policy initiatives. But it also provides cause for concern, because individuals who experience a preponderance of negative or unsuccessful policy initiatives and school reform efforts will be less likely to have the tools or skills that might facilitate constructive policy formation.

Complex Educational Environments

Individuals live in a variety of environments, and within these environments they face daily different situations that force them to make decisions and take action based on those decisions. Bounded rationality tells us that individuals develop heuristics, or conceptual schemas based on past experience and situational norms and values, that guide their decision-making process. If an individual's situation remains constant, it is possible to explain, even predict, patterns of decision-making. However, the context of public education (and life in general) is anything but constant; rather, it is an increasingly complex, even chaotic, system that has overlapping goals and sends out widely divergent messages—sometimes in the form of mandates—to individuals at each level of the system.

Within the context of the education system, individuals usually participate in a limited number of situations and thus have limited experience with different levels of the education system. Compounding this fact is the overwhelming complexity of the educational system, which involves various tiers (classrooms, schools, districts, state departments of education) each with corresponding responsibilities and well-developed organizational norms and values. The system is made more complex with the addition of organizations and stakeholders that oftentimes have widely divergent goals and objectives (e.g., teacher unions, community based groups, publishers, institutes of higher education, social service organizations). It is unreasonable to expect that individuals have the time or inclination to understand in detail the complexity of the entire system.

It is within such a complex system that public education policy is communicated and disseminated to individuals. On the surface, the transmission of policy within the educational system seems easy—the policy message can be transferred in a linear fashion from the state or district office down through subordinates until school principals or teachers receive the message and begin implementation. We know, however, that individual interpretation plays a major part in the transmission and understanding of policy and that individuals at different levels of the system can interpret a given policy in very different ways—even if it is stated the same way and presented in the same manner repeatedly.

Yes, policy implementation can be linear, but it is a substantial mischaracterization to think that it's always or mainly so. As Fullan (1999) notes, "the jury surely must be in by now that rationally constructed reform strategies do not work" (p. 3). The inherent complexity of the educational system helps to explain why a rational approach to policy transmission is impossible. However, this explanation doesn't solve the problem facing policymakers and implementers. The fact still remains that once policy is developed, there is an expectation that it should be implemented, and policymakers and implementers hope (for the most part) that the policy will improve students' educational experiences. Given the reality of this situation, how can complexity theory help to improve the implementation of policy in complex environments?

First, it is important to recognize and accept the overall complexity and chaotic nature of the system. Because the system is complex and constantly changing (Fullan, 1999), it is unlikely that any policy will be implemented as designed. There will always be unintended consequences, state and local adaptations, and wide divergence in how the policy is implemented in different settings. The chaotic nature of the system results in rapidly changing situations and a wide variety of messages communicated and transmitted across the system. Accepting, and in fact valuing, the complexity of the system suggests that an individual's capacity to adapt to shifting situations and make decisions based on their experience in similar situations is an asset rather than an obstacle to be overcome through policy mandates and regulation.

Second, it is useful to think of policy implementation and the policy itself as integrated and not as distinct elements to be analyzed and understood apart from the system within which they exist. Policy does not exist apart from the system in which it is being implemented any more than individuals exist separately from their environment. Understanding the system as integrated and inclusive of all of the elements that influence how policy is made and implemented, including individual decision-making and interpretation, provides a functional solution to the dilemma of policy implementation.

In *Change Forces: The Sequel*, Michael Fullan (1999) speaks to the difficulty of knowledge conversion—what he calls "tacit knowledge conversion"—in a complex and chaotic environment. Successful organizations, according to Fullan, are those that are able to "…convert tacit knowledge into explicit knowledge on an ongoing basis" (p. 16). These organizations have internal and external mechanisms that maximize their position in a complex and chaotic setting in order to create new ideas and knowledge. They do this by "…tap(ping) into the values, meanings, day-to-day skills, knowledge, and experiences of all members of the organization (including outside-the-organization connection) and make them available for organizational problem-solving"(p. 16).

The problem that business organizations face with tacit knowledge conversion applies directly to the problem of policy implementation in the public school system. Traditional top-down policy doesn't access the "values, meanings,…knowledge, and experiences" of practitioners in the field.

The tacit knowledge of policy implementers is never explicitly accessed and integrated into the policy as a whole. Understanding policy as an integrated part of the system recognizes and potentially utilizes the knowledge of individuals at each level of the educational system, leading to co-constructed policy that is shared rather than mandated.

The dilemma of policy implementation is solved, theoretically, by looking at the system (inclusive of the policy message, individuals, and the tiers and stakeholders in the system) as an integrative whole and understanding policy implementation as a process of knowledge conversion. When individuals interpret and make sense of policy, they are engaged in the process of knowledge conversion. Unfortunately, this process is often isolated and individual. The solution, then, is to make this process explicit and public, so that the tacit knowledge is clearly delineated and policy construction and implementation becomes collaborative rather than isolated and fragmented.

Fullan gives the following advice to schools and organizations on this point:

> The process of tacit knowledge conversion makes middle managers, like principals, crucial. Neither top-down strategies (they don't get at tacit knowledge) nor bottom–up strategies (they get at but don't convert tacit knowledge into usable, shared, explicit knowledge) work. Middle managers can help mediate external and internal forces toward purposeful knowledge creation by attacking incoherence resulting from overloaded and fragmented situations, i.e. the normal situations we find these days on the edge of chaos. (Fullan, 2001 p. 16)

Fullan's point that "middle managers" have a role to play in helping individuals interpret ideas (in our case, policy messages) is an important one. Indeed, it is useful to extend the analogy of the middle manager to all individuals who are in positions of power related to the implementation of education policy. In doing so, the role of mediators—policy intermediaries—as needed facilitators and supporters of interpretation and "purposeful knowledge creation" across the school system, and not just in schools, becomes increasingly significant.

Policy Formation and Implementation as Iterative and Recursive

Policy formation and implementation takes place within a complex, inherently chaotic system. Individuals are sense-makers and situational actors, making decisions and taking action based on their own interpretation of events, past experiences, and the norms and organizational constraints

presented by their current situations. As a result, top-down or bottom-up models of policy implementation do not adequately explain how policy is implemented. Rather, policy is appropriated by individuals at all levels of the system through a process that involves adaptive strategies such as bargaining, negotiation, and discretion. This leads to wide variance in how policy is implemented at the local level (even classroom by classroom). The local adaptation of policy is oftentimes seen as a barrier to effective policy implementation instead of an asset, thus rendering negligible the tremendous expertise and knowledge held and gained by practitioners (policy implementers) in the field.

It is clear that policy is not often implemented as intended by policymakers and that there is no guarantee that local adaptation will result in cohesive, systematic, and effective policy implementation in the field. Top-down mandates can't ensure cohesiveness and fidelity of implementation, yet local adaptation is similarly susceptible to incoherence and wide variability in how a policy is implemented. The solution to this dilemma lies in our understanding of the complexity of the educational system and of individuals as integrated elements of this system. Instead of artificially separating the decisions, opinions, experiences, and knowledge of the participants in the education system, we need to learn from each of these elements as they relate to one another. To do so requires conscious attention to dialogue and understanding. If dialogue and understanding is so critical to policy implementation, especially in parts of the system that are not functioning as well as could be expected, then mechanisms that support dialogue and the development of shared understandings around education policy are needed.

Why do we need policy intermediaries?

It is critical that individuals have an opportunity to develop shared understandings of the policy they are being asked to implement. However, the structure and organizational norms of public education in schools, school districts, and state departments of education are not always conducive to group learning and the development of common understanding of policy. Many schools do not provide opportunities for teachers to discuss district or state policy as it relates to classroom instruction. Even when time is provided in the form of common planning time, professional learning groups, or professional development, the norms and values of the school often do not encourage the creation of shared meaning around classroom issues. At the district

level, superintendents are in constant flux, leading to a lack of vision and coherency of message across the system. Further, large urban districts are overly bureaucratic, beset with departmentalization and isolated funding programs (which are tied to federal policy). This being the case, large urban districts are hard pressed to create a common vision and opportunities for stakeholders to engage in constructive discussions around education policy and reform initiatives[1]. At the state level the situation is similar and has been, most recently, extenuated by budget shortfalls. States, like districts, have been working to connect isolated funding programs and deregulated policy initiatives and align their accountability systems with Title I accountability systems.

The recent requirements of the No Child Left Behind Act (NCLB) only provide increased urgency to state efforts to align their systems and provide support to districts and schools. However, the urgency to implement the NCLB policy requirements has the unfortunate consequence of decreasing the potential for federal policy to be effective at the school and classroom level. As states hurry to do their part to roll-out NCLB, and districts and schools (especially those schools with the greatest need) hasten to implement policy initiatives (e.g., Reading First, Comprehensive School Reform, Supplemental Services, Title III), the tendency is to revert to a top-down, logical-positivistic approach to policy implementation. This being the case, it is of the utmost importance that policymakers, as well as states and districts involved in the policy implementation process, consider the role of intermediaries, be they organizations or individuals, who facilitate the sense-making process of individuals asked to implement policy and serve as conduits for the translation of policy between classroom practitioners and district- and state-level officials charged with monitoring and supporting policy and reform initiatives.

Policy intermediaries are presented as a key feature of the *Framework for Effective Policy Implementation* in Section II.

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[1] There are exceptions, of course. See the Broad Award for Excellence in Education
(http://www.measuretolearn.org/index.cfm?pg=best_practices).

Section II
A Framework for Effective Policy Implementation

The framework we propose is designed to be action oriented, in that it proposes a set of elements and strategies intended for use by policymakers and policy implementers rather than just an explanatory model of policy implementation. The framework is composed of three elements: (1) the form and content of policy; (2) the communication of policy; and (3) policy implementation capacities. A description of each element is provided below, structured as a response to the following question, or problem diagnoses:

> If policy implementation involves individual interpretation and appropriation by actors within and across a complex, multi-tiered educational system, what strategies and mechanisms can be used to facilitate the implementation of policy at the local level that, in turn, supports students' academic growth?

Form and Content

Education policy must be designed to be coherent, justifiable, legitimate, and integrated.

The policy must be *coherent*, in that it should make sense and be easily understood. The content of the policy message should have some connection to, or be able to reference, previous reform efforts or policy initiatives. If the content of a policy message does not connect to pre-existing policy initiatives, then the potential for wide variance in interpretation increases. Without coherence, individuals will quickly move to their own personal stock of experience in order to understand a policy instead of developing shared understanding based on their common experience in the school or district. Coherence does not necessarily imply a top-down approach to policy implementation; rather, ensuring that policy is coherent recognizes and builds upon local context and the current reform efforts taking place in local schools and districts. As an example, the Comprehensive School Reform Demonstration (CSRD) program evolved out of a variety of initiatives but was connected in policy to Title I school-wide programs. The CSRD program is a coherent policy because it contains a formal connection to existing policy. As such, individuals at the district and school level can potentially connect CSRD efforts to existing reform efforts rather than treat CSRD as a separate program that they have to implement in addition to existing reforms.

Policy must be *justifiable*, in that there must be a good reason why schools and teachers should implement a given policy. There are a multitude of reasons that might resonate with schools and teachers. Poor performance on state assessments can create a sense of urgency and pressure that prompts schools to implement a particular policy or reform initiative. A particular policy might specifically address the needs that a district or school has identified. If a teacher or superintendent asks, "Why should we do this?", the content of the policy needs to be able to provide that answer, and the answer needs to be more than "Because it's a federal/district mandate". Without justification, teachers will resort to the time-tested practice of simply waiting it out until the next administration.

The policy must be *legitimate*, in that the policy must be perceived as credible and the right thing to do. The idea that a policy must be legitimate is related to Goggin et al's (1990) use of communicative theory to explain the policy implementation process. If we understand that policy implementation varies not only through individual interpretation, but also due to the way the policy is communicated, we begin to understand why a policy (as well as messenger of policy) must be perceived as credible. The concept of legitimacy is explicitly linked to the coherence and justifiability of a particular policy; however, the credibility of policy requires that the means by which the policy message is communicated—be it written, in-person, or in a group setting— respects the importance and value of the policy implementer as an asset whose individual, local knowledge and experience is equal in importance (if not more so) to the formal policy written in law or regulation.

Finally, policy must be *integrated* with other state and local policies that impact district and school improvement efforts. Similarly tied to the coherence and justifiability of a policy, integration asks that a particular policy build upon and relate to other state and local practices in an understandable and meaningful way. In order to be integrated, it is often useful to design policy that is flexible and open to adaptation. Again, asking that a policy be integrated does not presume a logical-positivist approach to policy implementation because integration requires that a given policy attend to local conditions as well as district, state, and federal mandates. Policy integration necessitates that policymakers listen to and respect the input of local practitioners, but

also that local practitioners make the effort to understand how and why federal or state policy is constructed the way it is instead of dismissing it outright.

For a policy to be coherent, justifiable, legitimate, and integrated, flexibility must be written into it and it must incorporate mechanisms that not only allow for local adaptation, but also promote and encourage such adaptation as a vital element of its content and makeup. However, if such a policy were to be designed, it could not survive within the current structure of public education. It would need, as referenced earlier, a policy intermediary who is able to facilitate interpretation and communication within and across the system of public education.

Policy Communication

The communication of policy is an often overlooked yet important dimension of policy formation and implementation. Policy communication can take many forms—it can be written in law and regulation; it can come in the form of a memorandum from state or district officials; it can be expressed individually from district personnel to principals and from principals to teachers; or it can be communicated in a group setting such as a workshop or a large 'roll-out' session for a major policy initiative. Whatever the case may be, it is important that the policy is communicated in a way that respects the knowledge and situational expertise of the individuals being asked to implement it. Likewise, policy implementers should be given an opportunity to engage in dialogue and make sense of the policy with their colleagues in order to develop shared understandings of what they are being asked to implement. Without such an opportunity, policy implementers will continue to interpret policy, but they will do so individually, based on their own experience. Since the interpretation of a policy by the individual actor plays such a crucial role in how it is implemented, policymakers would be wise to direct considerable resources and strategies toward the communication of policy as a critical component of implementation.

In order to facilitate the communication of policy, two things are necessary. First, time and resources must be provided for individuals to talk about and understand a given policy. Policy guidelines and regulation should include resources that schools, districts, and states can use to discuss the policy at hand. Also, districts and schools can reallocate time and resources so that teachers and district personnel have an incentive, or an expectation, to engage in dialogue about

the policy they are being asked to implement. Second, a policy intermediary, or a communicator of policy, is needed to serve as a facilitator and conduit of policy information. In communicating a policy, the policy intermediary helps individuals understand how a particular policy is coherent and justified, and does so by providing credible support to the individuals involved in the process of implementation. Also, the policy intermediary helps individuals to understand the integration of the policy message within the local context and their own experience while also serving as a mechanism by which local knowledge is communicated to district, state, or federal policymakers. Without time and resources to engage in discussions about a given policy or a policy intermediary capable of facilitating these discussions and communicating the content of policy in a meaningful and credible manner, it remains unlikely that current education policy will be as effective as it could be.

What is a policy intermediary?

A policy intermediary is an individual (or organization) who understands his or her dual role as a policymaker and policy implementer and who actively facilitates his or her own and others' understanding and interpretation of a given education policy. A policy intermediary is typically someone 'in the middle' between state departments of education and districts, between districts and schools, or even in the school between the principal and classroom teachers. Although policy intermediaries are usually distinct from the state or district educational system, a strong case can be made that all individuals engaged in policy implementation can, at various times, be joint policy implementers and policy intermediaries and in doing so bridge the gap between top-down and bottom-up policy implementation. At times, state officials, district staff, and school principals jointly play roles in the process of policy construction and implementation by acting as policy intermediaries and supporting their colleagues and subordinates in creating shared understanding of policy. This is not often the case, however, because policy is typically communicated in a set of regulations, a request for proposal, or a memo passed along the chain of command. If there is discussion about a given policy at the state level, it is typically done in isolation, excluding the input of those in the field and in the classroom. This being the case, it remains important that the policy intermediary is somehow distinct, though not necessarily separate, from the state and district bureaucracy—effectively a state intermediary.

In sum, policy intermediaries support the communication of policy so that local adaptation, appropriation, and finally the implementation of policy is coherent at the local level while also providing a link between in-the-field practitioners and individuals at more removed levels of the system. In this way, policy implementers and intermediaries 'construct' policy through an iterative and recursive process that involves and respects the experience and knowledge of individuals throughout the system and the complexity of the system within which individuals understand and implement policy.

Policy Implementation Capacities

A critical, and missing, element in the current policy implementation literature is a discussion of the capacities and skills needed by educational leaders who play the roles of policy intermediaries. That is, if interpretation and negotiation by local actors is integral to the process of policy implementation, what are the local skills, processes, and knowledge needed by policy intermediaries to facilitate meaningful interpretation that promotes a contextual approach, local willingness, and buy-in to the implementation process? As educational leaders, these non-classroom based educators develop and utilize strategies designed to support dialogue among diverse stakeholders, to help teachers and principals make informed decisions about practice, and to provide a peer-based, local (and thereby credible) source of knowledge to the process of school reform. Through the lens of policy implementation, these individuals are the 'policy intermediaries' who are continually developing the skills and capacities to help themselves, their colleagues, and other stakeholders to understand and begin to make sense of education policy.

What are the skills and capacities needed by policy intermediaries?

The capacities essential to policy implementation include many of the skills and strategies possessed by skilled group facilitators and providers of professional development. However, the role that the policy intermediary must play in a complex educational system introduces a number of additional elements that characterize successful intermediaries. The capacities presented below are preliminary categories of skills and capacities. Further research is needed to understand the specific processes and strategies that policy intermediaries use when working with individuals in the field and at different levels of the system. Within the framework of bounded rationality theory, these four categories are understood as the basis for decision-making

heuristics that explain how and why policy intermediaries make decisions and then act upon those decisions.

Capacities of Policy Intermediaries

1. ***Role Awareness*:** Policy intermediaries possess a keen awareness of their roles as an intermediaries.
2. ***Systems and Networks Approach*:** Policy intermediaries utilize resources and networks efficiently and strategically.
3. ***Building Relationships*:** Policy intermediaries steadfastly work on building and sustaining relationships with other implementers at the state, district, or school level.
4. ***Contextualize Understanding*:** Policy intermediaries are consistently aware of local conditions that influence policy.

Role Awareness. Policy intermediaries understand that they play a specific role in the process of policy implementation. This role requires the ability to use multiple strategies, depending on the situation they are faced with, to help individuals begin to make sense of education policy and what a particular policy means for their school or district. In order to play this role, policy intermediaries must maintain an outsider's perspective (so that they can present new ideas and ask critical questions) yet obtain an insider, or peer-based, status so that questions and suggestions are seen as credible. The strategies that a policy intermediary uses to maintain this insider/outsider dual status vary depending on his or her past experience and local conditions (i.e., their situational awareness), but his or her understanding of the role of an intermediary remains constant.

Systems and Networks Approach: Policy intermediaries have a broad understanding of the educational system and are able to leverage this understanding to utilize resources and networks efficiently and strategically. By understanding the complexity of the educational system—often chaotic and confusing—intermediaries are able to make sense of the system and find leverage points, or mechanisms, that they can use to support schools and districts. An understanding of the systemic nature of public education provides a template that can be used to provide order (and thus some level of coherence) when helping district- or school-based educators make sense of various policy initiatives. Also, a systems approach contributes to the ability of the intermediary to provide feedback to district and state officials about how a particular policy is being understood and implemented at the local level, thus supporting the co-construction of policy.

Building Relationships: Policy intermediaries steadfastly work on building and sustaining relationships with other implementers at the state, district, or school level. The skills needed to build these relationships—mutual respect, developing trust, listening, and learning—are part of the intermediary's repertoire of strategies. Relationships are seen as the web that holds the system together as well as the means for leveraging resources and providing support. Also, relationships and the credibility, trust, and respect that comes with strong relationships allow the intermediary to navigate the insider/outside dilemma and ask the critical and hard questions that lead to sense-making and transformational change. Being able to develop strong relationships with individuals at different levels of the system (e.g., with a classroom teacher, a school principal, and a state official, for instance) allows for the transmission and understanding of policy messages that would otherwise not occur. An intermediary and a state official can pose the same question to a classroom teacher and get very different responses, because the state is perceived as monitoring and the intermediary as support. Similarly, intermediaries are better suited to provide feedback to state officials than are individual teachers or principals. Relationships allow intermediaries to communicate messages in a credible manner to a variety of stakeholders – theoretically closing the loop between top-down and bottom-up obstacles to policy implementation.

Contextualize Understanding: Policy intermediaries are consistently aware of local conditions that influence policy. By staying grounded in the local context, intermediaries remain credible and able to talk with local practitioners about issues of real, day-to-day concern. Without at least a minimal understanding of local context (e.g. teacher union issues, community issues, principal turnover, history of reform efforts), the intermediary is not able to facilitate shared understanding of current policy initiatives. Contextualizing understanding also applies to the intermediaries' awareness of larger district or state issues that have an impact on policy. Related to the importance of a systems approach, an understanding of the context in a particular district or a state-level department is just as important as the local context. Basically, contextualized understanding requires recognition of the complexity of the system and the existence of multiple local contexts, each requiring respect in their own right.

Through these strategies and capacities, policy intermediaries are able to personalize the process of policy implementation and successfully bridge the dichotomy between top-down mandates and local control and autonomy.

Conclusion

The policy framework presented on the preceding pages is meant to be action oriented in that it can guide policymakers and implementers as they engage in the difficult and often confusing process of policy implementation. Also, the framework can be used to evaluate (not predict) current approaches to policy implementation as a way of provoking dialogue and discussion about this complex topic. The framework is theory based yet preliminary in that some of its elements are derived solely from theory and have not been directly observed or tested in the field. In developing this framework, we have striven to recognize the complexity and immediacy of policy implementation and the importance of intermediaries as *constructors* of education policy.

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