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AND EDUCATION COMMITTEE

“Coherence in Fiscal and Programmatic Planning”

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Chairs Alvarez and Muratsuchi, members of the Assembly Budget and Education committees, thank you for having me here today. My name is Jason Willis. I’ve spent 25 years across practice, policy, and academia in various social sectors, notably public education – from urban school systems, to WestEd, where I supported implementation of the LCFF and the CYBHI, to now teaching at McGeorge School of Law and lecturing at the Yale School of Management. The variety of these experiences gives me a unique vantage point on the topic of this hearing.

Defining the Coherence Problem

Important for our discussion today is to set a definition of coherence as it pertains to public education. *Coherence* is when every area of activity reinforces and is reinforced by others, both improving how bureaucracy responds to pressing social issues and aligning fundamental values and purpose.¹ The good news: through LCFF, California has articulated and has well-aligned values – equity, accountability, continuous improvement, and local control. Signals about coherence in our fiscal and programmatic planning indicate that, while there is widespread agreement on a core set of values, the machinery intended to reinforce them is not functioning as it should.

Drivers of Incoherence

Recent evidence confirms what practitioners tell us in anecdote: the system is far from coherent. I offer several evidence-based findings, including detailed back-up for the committee’s inspection upon request.

¹ Cairney, P. (2025). *Why perfect policy coherence is unattainable*. *Policy Sciences*, 58, 619–642.
Ram-Rainsford, T. K. (2024, May). *Achieving policy coherence: A central role for central governments* (M-RCBG Associate Working Paper Series No. 230). Mossavar-Rahmani Center for Business & Government, Harvard Kennedy School.

First, an investigation of the legal, accounting, planning, and auditing systems over the last 12 years reveals a persistent increase in complexity and volume of required activities. This is so pervasive that public policy labeled the phenomenon. It is called regulatory sediment. This is the litany of rules, funding restrictions, and planning procedures that education administrators have to wade through that slow a local system's ability to change and transform itself. One example and the tip of the proverbial iceberg: between the LCAP's introduction in 2014 and the template's latest revision in 2024, the number of words in the instructions alone grew by over 800%. Another example: when assessing the text complexity of the LCAP instructions, an individual must have an advanced reading level equivalent to that of a graduate student. The average reading level of a Californian is at the seventh-grade level.²

Second, in the forthcoming *Getting Down to Facts III* research compendium³, we find that education administrators spend nearly 26% of their workweek on compliance activities that they find burdensome—that is, over one full workday per week for every administrator. For illustration purposes, that is enough time and resources to provide every unduplicated count student in California with a 15-minute, personal 1-1 check-in every week for the entire school year. Effectively, this puts education administrators in a conflict: do I document how to support students, or do I spend time supporting them? The system creates a Hobson's choice – the illusion of a free choice when only one option is actually viable, given the constraints.⁴

Third, in the same study, we discover an intriguing and perspective-altering behavior. Education administrators – when they see a compliance activity as valuable (e.g., equitable student outcomes, genuine drivers of improving adult practice, etc.) – actually spend more time on it. It is not

² Willis, J. February 2026. *The Weight of Good Intentions: Initial Measurement on the Rise of Compliance Activities a Decade After California's Funding and Accountability Reforms*. WestEd. San Francisco, CA.

The research paper documents extensive, systematic patterns of changes in various requirement documentation for LEAs. A forthcoming LCAP / DA study links more closely activities for student groups to specific investments.

³ Willis, J. and Loeb, S. 2026 (forthcoming). *Hidden in Plain Sight: Compliance in California Public Schools*. Getting Down to Facts III Technical Report. Stanford Center for Accelerated Learning Evaluation (SCALE). Stanford University. Palo Alto, CA.

⁴ The compliance activities required of education administrators today has created a crowding out effect – where one activity displaces another not through prohibition but through resource consumption. In this instance, compliance tasks crowd out instructional, strategic, and change management activities not because anyone decided they should, but because time and attention are zero-sum.

that these administrators are unwilling to complete paperwork – they simply want it to be useful in advancing more equitable and positive student outcomes. The question we should be asking ourselves is not: what more reporting activities can we put on local education systems? It is: which compliance activities generate authentic progress for the majority of system actors, versus those that benefit just a few?

Fourth, a recent report from the Core Working Group on the Statewide System of Support – comprising LEA leaders, COE leaders, and state agency representatives – reached very similar conclusions: the system's core values are sound, but it is not working as intended. This group agreed so strongly that they anchored their entire set of recommendations around two principles: reciprocal accountability and coherence.⁵

Let me be clear: no single agency is the problem, nor is any single agency the solution. This is a systemic pattern in which all partners – many in this room – must recognize the role they play in contributing to this conundrum and the assets they can bring to bear to help course-correct the path that California is on.

Solution Paths

This is a complex endeavor. These recent investigations signal that this incoherence is not isolated – it is pervasive across numerous areas of California's public education system. To that end, there is no quick fix here, nor a predefined playbook. It took us nearly a decade to realize the conundrum that we are in; it will take some time to get us on the right track. I offer a handful of ideas to take some initial steps.

⁵ Hough, H. and Willis, J. December 2025. [Statewide System of Support Core Working Group Report: Recommendations](#). California Collaborative for Educational Excellence. Sacramento, CA.

Direct text from the report: "Across conversations, there was strong agreement that the core ideals of the [system of support] are right—a system centered on support rather than sanctions, responsive to local context, committed to resource equity, guided by continuous improvement, and built on trusting relationships. ... Identification for assistance is unstable, overly broad, and confusing. Roles across state and county agencies remain fragmented, producing overlapping processes and unclear lines of authority. This is, for all intents and purposes, a clear lack of coherence expressed in yet another part of California public education system."

First, the state needs to hit the brakes on what is being embedded in new education programs and laws. One way to achieve this is to systematically reduce resource categories and their associated requirements, which can be monitored through a simple, temporary mechanism: the Legislature, Administration, and regulating agencies will not require anything new of LEAs without first identifying a commensurate reduction or a genuine merging of existing compliance activities. This is not unprecedented, as several states to the east and north have successfully implemented similar policy architectures.

The public education sector already tends to engage in *compliance drift*. The tendency to regress to process-oriented, outcome-blind practices despite well-meaning intent. Second, to counterbalance this, deliberate, stable, and intentional investments need to be made to support adults in reprogramming their instincts and building their capacity to work towards genuine improvement. Areas such as the statewide system of support, literacy, and integrated care for highly mobile youth are fertile ground.

Third, if state leaders truly desire to support the sector in moving away from this compliance mentality, you need to start with your own processes and systems. Start by interrogating and revising the process by which laws are written so that they are more fully integrated across disciplines and therefore reflect the realities of practitioners and a community's daily life. This will require more cross-committee work in the Legislature, further collaboration in the proposal process, and genuine investment in implementation mechanisms that actively guard against just submitting more reports.⁶

In closing, there are no quick fixes here. Do not let anyone fool you otherwise. The undertow toward compliance in our public systems is extraordinarily strong. Getting back to the inspired position at the start of LCFF will require discipline, commitment, and a willingness to pass the baton to future California leaders intent on making progress in this direction. Thank you.

⁶ Willis et al. June 2025. *Integrated Policymaking for California's Youth: Keeping the Whole Child Central from the Start*. Breaking Barriers California. Sacramento, CA.

This policy research report provides suggested actions that members of the executive and legislative branch might take to increase the level of collaboration on new policy development that results in downstream, on the ground implementation that is truly integrated – and therefore reflective of the experience and needs of children, youth and families.

