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From Funds to Frameworks: How States Operationalize Title II Education Funding

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This study employs a document analysis of Every Student Succeeds Act (ESSA) plans from 2017 to 2022 to examine Title II, Part A, implementation across all states. We analyzed state-level fund allocation, leadership development activities, and discrepancies between planned and actual spending. Results reveal substantial heterogeneity in state approaches: 23.5% made Title II-A-specific plan amendments, yet 86.3% maximized state reserves by 2020-2021. Leadership reserve allocation increased from 31.4% to 45.1%, indicating growing recognition of leadership importance. Findings suggest federal policy allows state adaptation while highlighting significant gaps between planning and implementation in educational leadership funding.

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Abstract

This study employs a document analysis of Every Student Succeeds Act (ESSA) plans from 2017 to 2022 to examine Title II, Part A, implementation across all states. We analyzed state-level fund allocation, leadership development activities, and discrepancies between planned and actual spending. Results reveal substantial heterogeneity in state approaches: 23.5% made Title II-A-specific plan amendments, yet 86.3% maximized state reserves by 2020-2021. Leadership reserve allocation increased from 31.4% to 45.1%, indicating growing recognition of leadership importance. Findings suggest federal policy allows state adaptation while highlighting significant gaps between planning and implementation in educational leadership funding.

Introduction

There is increasingly broad recognition and empirical evidence that school leaders—such as principals—are critical to school improvement and success in every domain, from climate and human resource management to achievement and students' overall well-being (Hallinger & Heck, 2010; Leithwood & Montgomery, 1985; Leithwood et al., 2019). There is simply no substitute for an effective principal: one effective principal has a similar effect to 23 effective teachers, highlighting that the effectiveness of the principal is more important than that of any single teacher (Grissom et al., 2021). However, the principal's role is complex, dynamic, and intense (Horng et al., 2010). It is no surprise, then, that principal turnover is high—principals leave a school about every four years on average nationwide—and that there are current and forthcoming school leader shortages (Gates et al., 2006; Levin & Bradley, 2019). Given the necessity of prepared, effective, and available school leaders for ongoing school improvement and effectiveness, it is essential to examine the resources that focus on preparing, placing, and developing that pool of leaders (Miller et al., 2016; Ni et al., 2014).

In 2015, the Every Student Succeeds Act (ESSA) enshrined into law the value of educational leadership as a core component of federal education policy by highlighting the importance of targeted funding for leadership capacity development (Fuller et al., 2017; Young et al., 2017). The Supporting Effective Instruction State Grant Program is a federal funding initiative that allocates money through title grants to state education agencies (SEAs), which then distribute these funds to local education agencies (LEAs) such as school districts. Title II, Part A (referred to as Title II-A) funds, in particular, represent the most substantial federal investment in professional development for teachers, principals, and other educational leaders (Learning

Forward, 2024). Despite the established importance of quality leadership in fostering student success (e.g., Grissom & Bartanen, 2019), empirical research on how districts leverage these funds to support educational leadership development remains limited.

Under the evidence-based policy framework, states are required to follow specific guidelines in the process of submitting their consolidated plans to the United States Department of Education (USDE) and obtaining authorization from the federal government in order to implement the proposed plans (ESSA, 2015). Additionally, states must resubmit their plans (i.e., addenda and amendments) if they intend to make any changes to implementation strategies. This requirement creates a structured accountability system that theoretically allows for the tracking of policy evolution and funding allocations over time (McGuinn, 2019).

Despite consistent accountability efforts and its significance, the funding landscape for Title II-A has become increasingly uncertain. House Appropriations Committee Republicans proposed a draft bill (H.R.5894 - 118th Congress, 2023-2024) that suggested eliminating Title II-A entirely (Ellerson-Ng, 2023; Cardichon & Darling-Hammond, 2019). This proposal follows a pattern of proposed reductions to Title II-A funding that began during the Trump administration, which repeatedly proposed eliminating the program in budget requests (Ujifusa, 2019). Title II-A has faced persistent challenges to its continuation (Learning Policy Institute, 2024), unlike Title I funding, which enjoys broader bipartisan support (Abernathy, 2024) and only decreased slightly while surviving Trump's opposition (Lieberman, July 2025). Beyond political proposals, the funding allocation for Title II-A has shown a concerning trend of gradual reduction over time. From a peak of approximately $2.9 billion in FY2016, allocations have decreased to approximately $2.2 billion recently (U.S. Department of Education, 2023). This represents a decline of nearly 25% in real terms when accounting for inflation (Learning Forward, 2024).

While executive orders cannot unilaterally suspend federal funds because such authority rests with Congress, the political uncertainty surrounding Title II-A places it in a precarious position (Burnette, 2018). At the time of this article's submission, the USDE had just distributed letters to states indicating that it would delay significant funding distributions across several programs, including $2.19 billion in Title II-A dollars nationwide. USDE letters stated: "Given the change in Administrations, the department is reviewing the FY 2025 funding for the [Title II-A] grant program(s), and decisions have not yet been made concerning submissions and awards for this upcoming academic year. Accordingly, the department will not be issuing Grant Award Notifications obligating funds for these programs on July 1 [2025] prior to completing that review." This uncertainty creates significant challenges for states and districts attempting to develop and sustain leadership development initiatives (Sutcher et al., 2017).

Framework and Relevant Literature

Fiscal Federalism and implementation heterogeneity

Fiscal federalism provides a powerful theoretical framework for understanding the complex intergovernmental relationships that shape educational policy implementation across states (e.g., Garcia-Milà et al., 2018; Manna & Ryan, 2011; Patrick, 2012). At its core, fiscal federalism examines how different levels of government share responsibilities for generating public revenue, making expenditure decisions, and optimizing resource allocation while accommodating diverse preferences across jurisdictions (Oates, 1999). This framework is particularly valuable for analyzing the heterogeneity in educational policy implementation across states, as it illuminates how federal funds flow through state agencies to ultimately impact local educational outcomes (Garcia-Milà et al., 2018).

This complex intergovernmental dynamic helps explain the substantial variation observed in states' interpretations and implementation of federal education policies. In particular, empirical studies (e.g., Corcoran et al., 2004; Murray et al., 1998; Shores & Steinberg, 2019) have documented heterogeneity in education finance across states and their roles in creating significant variation in federal educational policy implementation. Patrick (2012) examined performance policies aimed at improving workforce quality and found that states' needs and commitments to federal initiatives influenced the strength of voluntary state performance policies. These policies affected the dismissal of underperforming educators and retention of qualified employees, demonstrating the direct impact of state-level implementation decisions on education outcomes. Similarly, the USDE's evaluation of Title I and II-A program initiatives revealed that states broadened their measures for identifying struggling schools between 2014 and 2018 while increasingly using performance data to support effective teaching (Troppe et al., 2020), illustrating how states continue to adapt and modify federal program requirements to fit their local contexts and priorities.

However, the relationship between fiscal federalism and policy outcomes varies across different conditions, with institutional quality and local government capacity being crucial determinants for successful implementation of policies (Sow & Razafimahefa, 2017). Multiple factors contribute to this implementation heterogeneity within the fiscal federalism framework. Social constructivism recognizes that who participates in policy decisions, how officials perceive target populations, and what personal interests are related to the policies all shape policy implementation while creating substantial variance across state and local governments (Schneider & Ingram, 1993). The varying perceptions, beliefs, and personal characteristics of street-level bureaucrats and local officials fundamentally shape how national policies are translated into action (Lipsky, 2010), generating significant implementation heterogeneity that ultimately determines whether citizens experience consistent or wildly divergent policy outcomes across jurisdictions (Mettler & SoRelle, 2018). Institutional characteristics create another layer of implementation variation, including school board politics and governance structures (Moe, 2005a, 2005b), administrative capacity for financial management, grant compliance, and program administration (Honig, 2006; Manna, 2006). These findings are relevant for understanding the variability in Title II-A implementation across states, as they suggest that SEAs with stronger institutional capacity, officials' perception of leadership and leadership development, or state revenue may be better positioned to utilize Title II-A funds effectively for leadership development.

Title II-A Funding for Educational Leadership: Structure and Significance

Within the broader fiscal federalism framework of ESSA, Title II-A—the Supporting Effective Instruction State Grant Program—occupies a particularly significant position for educational leadership development (Learning Forward, 2024). ESSA aims to enhance student performance, improve educator effectiveness, increase effective educators, and ensure equitable access to quality teachers and leaders (ESSA, 2015).

Title II-A is the only formula-based funding source dedicated to professional learning for teachers and educational leaders, providing over $2 billion per year to districts via states. This initiative aims to implement effective instruction by focusing on the preparation, recruitment, and development of educators (U.S. Department of Education, 2020; Herman et al., 2017; Learning Forward, 2024; Sutcher et al., 2017). Unlike other Title funds (e.g., Title I), this formula-based fund specifically targets educators and educational leaders. Educational leaders and aspiring leaders have limited access to federal support, unlike teachers who can access multiple funding streams, including Title I, specialized grants, and teacher loan forgiveness. This dependence creates unique vulnerabilities within the fiscal federalism structure because leadership development initiatives lack diversified funding sources, making them susceptible to immediate program disruptions and elimination without alternative federal support—unlike teachers who have multiple funding pathways through Title I, specialized grants, and loan forgiveness programs.

Title II-A is the main source of federal funding for teachers and school leaders, allowing SEAs to keep up to 8% of this money for state activities, like hiring staff and developing leadership programs (Fuller et al., 2017; Sutcher et al., 2017). Specifically, Title II-A funding is distributed through a formula-based allocation system that begins with federal appropriations to states based on student population and poverty metrics. From their total allocation, states may reserve up to 5% for state-level activities such as teacher certification reform and professional development initiatives (ESSA, 2015), including 1% of administrative costs. ESSA introduced a new provision allowing states to reserve up to an additional 3% of funds specifically for principal and school leadership development programs. The remaining funds (at least 92% of the total state allocation) are distributed to LEAs as subgrants, which districts can use for various purposes, including professional development, teacher and principal induction programs, class size reduction, and leadership training initiatives (U.S. Department of Education, 2020).

This funding structure allows for greater state and local discretion compared to the more prescriptive Title I formulas, which creates more opportunities for targeted investments in educational leadership while also introducing implementation variability across states (ESSA, 2015; Learning Forward, 2024; Snyder et al., 2019). This structure creates a multi-tiered fiscal relationship where federal resources flow through states to support leadership development initiatives that ultimately impact local educational outcomes (Fuller & Young, 2016; Fuller et al., 2017). The structure of Title II-A funding exemplifies classic fiscal federalism principles of conditional grants-in-aid. The federal government establishes broad parameters for fund usage while delegating significant discretion to states regarding specific allocation decisions and program designs. This arrangement allows for adaptation to local contexts while maintaining alignment with national priorities for educational improvement. As Manna and Ryan (2011) observe, this intergovernmental arrangement creates a complex implementation chain wherein federal intentions may be reinterpreted or modified at each successive governance level.

Research Gap

While several studies have analyzed ESSA state plans across various policy domains such as gifted education (Kaul & Davis, 2018), alternative education (Kannam & Weiss, 2019), Indigenous education (Umansky et al., 2023), or school improvement science (Cunningham & Osworth, 2024), only a limited number of studies (e.g., De Voto & Reedy, 2019; Fuller et al., 2017; Young et al., 2017) have specifically addressed ESSA's role in supporting educational leaders. This limited research demonstrates the importance of paying greater attention to the critical aspect of educational fiscal federalism as it pertains to leadership development. However, even these studies are limited in scope, often relying on unauthorized plans or examining only a single time point rather than analyzing changes in allocation and actual spending patterns over time. Although there are previous studies (Herman et al., 2017; Levin et al., 2020) that examined school leadership interventions and initiatives at the state level funded by Title II, they focus primarily on programming aspects without substantial attention to the fiscal mechanisms that support them. In this regard, this study examines Title II-A implementation patterns across all states by analyzing state plan modifications, fund allocation strategies, leadership development activities, and discrepancies between planned and actual spending to understand how fiscal federalism principles shape educational leadership policy implementation under ESSA.

Research Method

This study uses a quantitative document analysis method that includes both quantitative content analysis and descriptive statistical analysis to look at how states decide to spend Title II-A under the ESSA. This study looks at ESSA state plans in a systematic way to identify policy changes, determine how much money each state gets, and—when possible—assess why each state spends money on leadership-related things.

Data Sources and Selection

This study examines two distinct categories of documents to investigate the research questions. Firstly, we examined the "ESSA Consolidated State Plans" (referred to as ESSA plans), which are publicly accessible documents uploaded on the Office of Elementary and Secondary Education website[1] or each state's Department of Education website. States began

[1] We downloaded documents from the website before 2025. Currently, the OESE website pages for consolidated grants have been removed (confirmed July 10, 2025).

submitting these consolidated state plans in 2015, with many updating them periodically, especially during the COVID-19 pandemic when states requested amendments or waivers. These documents offer information regarding how each state and district plans to allocate Title II-A funds for specific programs and how these allocations have evolved.

We focused on the initial ESSA plan authorized for each state—typically between 2017 and 2019—to meet the criteria of document analyses, such as authenticity, credibility, representativeness, and meaning, as suggested by Kridel (2015). Since federal government approval ensures that state ESSA plans adhere to the USDE's rules, it is reasonable to assume that LEA administrators would also follow these rules when allocating and using funds. Therefore, authorized plans would meet the criteria for document analyses. After reviewing the initially authorized state plans, we also examined any updates or changes that were made in amendments or addenda to the ESSA plans that states published later.

Secondly, this study also utilizes publicly accessible data from four years of reports issued by the USDE called "State and District Use of Title II, Part A Funds." The data covers the period from the school year 2017–2018 to the school year 2021–2022. This file has information about Title II-A, such as how much federal Title II-A money is given to each program, how much each state gets from Title II-A, and what percentage of school districts in each state use Title II-A funds for certain programs. This document offers a comprehensive fiscal overview of Title II-A funds at both the federal and state levels. Using tables included in these documents, we examine how the distribution of Title II-A funds has been altered over the early ESSA implementation period (2017-2022) and the overall pattern in Title II-A allocation, reflecting changing state and district priorities under the new federal framework. Furthermore, we compared two types of documents to examine how the initial ESSA plan has been implemented, as indicated by USDE documents.

Document analysis

Documents serve as valuable policy research sources that translate abstract ideas into concrete administrative actions (Karppinen & Moe, 2012). These documents convey the intentions of state and district administrators and guide policy implementation at different levels of governance. Document content analysis is a systematic method of reviewing and interpreting written records to extract meaning, quantify trends, and analyze policy decisions (Bowen, 2009; Krippendorff, 2018). According to Bowen (2009), documentation analysis typically involves three main steps: skimming (a superficial examination), reading (a thorough examination), and interpretation. Specifically, quantitative content analysis (Bowen, 2009; Cardno, 2018; Morgan, 2022; Krippendorff, 2018) can be used to quantify policy trends, categorizing amendments, funding allocations, and programmatic decisions into predefined categories.

We primarily focused on quantitative content analysis for several reasons. Firstly, quantitative content analysis enables cross-state comparisons by measuring the frequency and proportion of amendments, addenda, and funding allocations. This method allows us to identify patterns in Title II-A funding and policy revisions across different states. Unlike qualitative analysis, which focuses on in-depth interpretations of a limited number of documents, quantification of policy trends enables broader generalizations and statistical aggregation across multiple policy texts. Additionally, we can track changes and trends over time using numeric data. Furthermore, by quantifying both ESSA state plans and USDE reports, this study enhances its validity by comparing intended policy actions (ESSA plans) with actual funding allocations

(Title II-A reports) and yielding richer information. However, a qualitative approach would not allow for direct numerical comparison between these two datasets.

Analytic Approach

In this study, we employed a quantitative content analysis approach to examine ESSA plan documents. Following Bowen's (2009) framework, we systematically identified and counted formal amendments (official modifications to the original ESSA plan requiring federal approval) and addenda (supplementary documents or COVID-related waivers) published between 2017-2022 that specifically addressed Title II-A provisions, excluding purely administrative updates or changes to other ESSA sections. We then categorized whether these Title II-related modifications represented substantive changes (i.e., new program additions, altered funding allocation percentages, or modified core implementation strategies) or clarifications (i.e., additional detail on existing programs, technical corrections, or restated policies without changing implementation approaches). Authors independently reviewed each amendment and addendum using these criteria for consistency, with discrepancies resolved through discussion until consensus was reached.

Additionally, we identified and quantified the percentage of Title II-A funds allocated at the state level and coded and categorized funded programs based on their goals, target population, and contents. Using an inductive approach, we initially identified emerging categories from program descriptions and then recategorized them deductively based on the previous literature (e.g., Murphy, 2016). This approach aligns with quantitative content analysis (Cardno, 2018; Krippendorff, 2018), which emphasizes the quantification of document contents using predetermined categories.

After conducting a pilot analysis, a refined coding scheme was applied to categorize activities that support educational leaders in a comprehensive manner before finalizing the deductive coding phase. We systematically counted the occurrences of different program types and funding allocations, enabling statistical comparisons across states. By setting up our analysis in this way, we made sure that it was a thorough and repeatable way to learn about how Title II-A funds are distributed and how policy changes are made in ESSA plans.

In addition to analyzing ESSA state plans, we conducted descriptive statistical analysis using the USDE's Title II-A report to determine the amount of Title II-A funding allocated to each activity at the state level. This analysis helped us understand the Title II-A allocation and utilization pattern across states. We also examined the ESSA state plans and their implementation to compare the planned and actual outcomes.

Both authors independently reviewed the documents and held multiple meetings to reach mutual agreement on coding decisions. Discrepancies were discussed and resolved through consensus. This collaborative review process ensured consistency in interpretations and strengthened the credibility of the findings.

Results

This section presents findings from our document analysis of ESSA Consolidated State Plans and USDE Title II-A reports across all 50 states, the District of Columbia, and Puerto Rico. The results are organized according to our research questions, examining (1) patterns of Title II-A plan amendments and addenda, (2) state-level allocation of Title II-A funds, (3) types of leadership-focused activities funded, and (4) discrepancies between planned and actual Title II-A spending.

Result 1. State Modifications to Title II-A Plans

Our analysis of state ESSA plans revealed extensive modifications to the plans across most states, although only a relatively small proportion specifically targeted Title II-A provisions. As shown in Table 1, 41 states (80.4%) submitted addenda to their original ESSA plans, and 43 states (84.3%) made formal amendments. While these numbers indicate substantial policy evolution following each state's initial ESSA plan approval, only 12 states (23.5%) made amendments specifically addressing Title II-A provisions throughout the years.

Among the 12 states with Title II-specific amendments, we analyzed the content of each amendment and amendment approval document of each state and identified two distinct categories of modifications: substantive changes to implementation plans (58.3%, n=7) and clarifications to existing policies (41.7%, n=5). The first category comprised substantive changes to implementation plans, which included modifications to funding allocation strategies, alterations to program design and delivery methods, or the introduction of new initiatives not present in the original ESSA plans. The second category consisted of clarifications to existing policies, which involved providing additional details or explanations of previously stated policies without fundamentally altering the implementation approach or resource allocation patterns outlined in the original state plans. States making substantive changes to their Title II-A plans included Arizona, California, the District of Columbia, Kentucky, Nevada, North Carolina, and Utah. These modifications typically involved restructuring program priorities, adjusting funding allocation formulas, or adding new leadership initiatives. For instance, Nevada revised the use of Title II-A funding in the 2019 version of the SEA plan to address the state's acute teacher shortage and certification challenges, stating that one purpose of revision was "assisting teachers in becoming fully state-certified in content areas and updating the description of the educator growth and development system." Additionally, in the 2023 amendments, the Nevada Department of Education (NDE) eliminated "zoom school" and "victory schools" and introduced an incentive/compensation plan in state law.

States providing clarifications to existing Title II-A provisions without substantial programmatic changes included Illinois, Indiana, Iowa, Maine, and Virginia. These amendments typically offered additional context or explanation regarding implementation procedures without altering their fundamental approach to Title II-A utilization. For instance, Iowa and Maine provided additional data comparing ineffective teachers in Title I schools to those in non-Title I schools, offering specific plans for analysis of students' disproportionate access to high-quality educators.

The relatively small proportion of states making Title II-specific amendments (23.5%) contrasts sharply with the high percentage making other ESSA amendments (84.3%). This discrepancy suggests that while states actively refined their overall ESSA implementation approaches, Title II-A provisions remained comparatively stable once established. However, this apparent stability in Title II-A provisions may reflect limitations in our document-based analysis rather than actual policy stability. Since states are not required to detail all implementation specifics in their ESSA plans, many policy changes may occur at the operational level without requiring formal amendments to the consolidated state plans. States may modify their Title II-A approaches, programs, or priorities within the broad goals outlined in their original plans and communicate these changes through state department websites, guidance documents, or other channels that would not be captured in formal ESSA plan amendments (Manna, 2006). This conclusion suggests that our finding of Title II-A stability should be interpreted cautiously, as it may reflect the general nature of ESSA plan requirements rather than genuine policy continuity. The discrepancy between Title II-A and other ESSA plan amendments may indicate that states found their original Title II-A frameworks sufficiently flexible to accommodate evolving needs without requiring formal plan modifications.

Table 1. Addendums and Amendments

States	Addendum	Amendments	Title II-A Amendments	Title II-A Amendment type
Alabama	Y	Y		
Alaska	Y	Y		
Arizona	Y	Y	Y	changes in plan
Arkansas	Y	Y		
California	Y	Y	Y	changes in plan
Colorado	Y			
Connecticut				
Delaware	Y	Y		
D.C.	Y	Y	Y	changes in plan
Florida		Y		
Georgia	Y	Y		
Hawaii		Y		
Idaho	Y	Y		
Illinois	Y	Y	Y	clarification
Indiana	Y	Y	Y	clarification
Iowa		Y	Y	clarification
Kansas	Y	Y		
Kentucky	Y	Y	Y	changes in plan
Louisiana		Y		
Maine	Y	Y	Y	clarification
Maryland	Y	Y		
Massachusetts	Y			
Michigan		Y		
Minnesota		Y		
Mississippi	Y	Y		
Missouri				
Montana	Y	Y		
Nebraska	Y	Y		
Nevada	Y	Y	Y	changes in plan

New Hampshire	Y	Y		
New Jersey		Y		
New Mexico	Y			
New York	Y	Y		
North Carolina	Y	Y	Y	changes in plan
North Dakota	Y			
Ohio	Y	Y		
Oklahoma		Y		
Oregon	Y	Y		
Pennsylvania	Y	Y		
Rhode Island				
South Carolina	Y	Y		
South Dakota	Y	Y		
Tennessee	Y	Y		
Texas	Y	Y		
Utah	Y	Y	Y	changes in plan
Vermont	Y			
Virginia	Y	Y	Y	clarification
Washington	Y	Y		
West Virginia	Y	Y		
Wisconsin	Y			
Wyoming	Y	Y		
Puerto Rico	Y	Y		

Result 2. State-Level Fund Allocation Patterns

Our analysis of state-level Title II-A fund allocation reveals substantial variation in how states reserve and utilize Title II-A funding at the SEA level. As shown in Table 2, while all states are permitted to reserve up to 1% of their Title II-A allocation for administrative costs, only 12 states (23.5%) explicitly documented this allocation in their ESSA plans. This variation suggests either inconsistent reporting practices or varied approaches to administrative cost attribution across states.

For the broader SEA-level reserve (up to 5% of total allocation, including 1% of administrative costs), 20 states (39.2%) provided specific allocation percentages in their ESSA plans. Among the 23 states that made revisions to Title II-A plans, the majority (85%, n=17) designated the full 4-5% allowable reserve for SEA-level activities, indicating a strong preference for maintaining maximum state-level discretion over a portion of Title II-A funds as well as investing in state-level infrastructure for program administration, technical assistance, and capacity building. However, a small number of states, including North Dakota (2.6%) and Pennsylvania (2.85%), opted for lower state-level reserves, potentially reflecting a philosophy of pushing more resources—and responsibilities—directly to districts rather than building extensive state-level administrative capacity.

The additional leadership-specific reserve (up to 3% of funds) authorized under ESSA represents a significant opportunity for states to target resources specifically toward leadership development initiatives. Our analysis found that 20 states (39.2%) documented plans to utilize this additional reserve. This finding is particularly notable given that this optional set-aside requires states to actively prioritize leadership development over other potential uses of Title II-A funds.

Table 2. Title II-A allocation at SEA level

States	admin allocation (%)	SEA activities (%)	leadership reserve (%)
Alabama		4	
Alaska		3	2
Arizona			
Arkansas			
California		3	
Colorado			
Connecticut			
Delaware			
D.C.			
Florida			
Georgia			
Hawaii			

Idaho			
Illinois			
Indiana		4	3
Iowa			
Kansas			
Kentucky		5	
Louisiana			
Maine			
Maryland			
Massachusetts			3
Michigan	1	4	3
Minnesota	1		3
Mississippi			
Missouri			
Montana	1	4	3
Nebraska	1	4	3
Nevada		4	3
New Hampshire			
New Jersey			
New Mexico		5	3
New York			
North Carolina			3
North Dakota	1	2.6	
Ohio		3	3
Oklahoma	1	1	4
Oregon			
Pennsylvania		2.85	
Rhode Island	1	4	
South Carolina			3
South Dakota			
Tennessee			3
Texas		3	
Utah			3
Vermont	1	4	
Virginia	1	4	
Washington		4	3
West Virginia	1	4	0
Wisconsin			3
Wyoming	1	4	3
Puerto Rico	1	4	2

* Note: Administrative allocation represents up to 1% of Title II-A funds states may reserve for administrative costs; SEA activities allocation represents up to 5% states may reserve for state-level activities (including the 1%

administrative costs); Leadership reserve allocation represents up to 3% that states may reserve specifically for principal and leadership development programs under ESSA provisions.

Result 3. Leadership Development Activity Types

Our analysis of the types of leadership-related activities funded through Title II-A revealed both common priorities across states and substantial diversity in programmatic approaches. Table 3 provides a comprehensive mapping of leadership development strategies documented in state ESSA plans, with states utilizing between zero and seven distinct leadership development approaches (M = 2.10).

Notably, 12 states (23%) reported no specific leadership development activities in their ESSA plans despite the explicit emphasis on leadership development in the Title II-A legislation. Among states documenting leadership initiatives, considerable variation emerged in both the number and types of programs funded. Pennsylvania demonstrated the most comprehensive approach with seven distinct leadership development strategies, followed by Georgia, New York, North Dakota, Tennessee, and Utah, each implementing four strategies.

The most frequently implemented leadership development approaches across states showed several dominant patterns. Professional Learning/Development was the most common approach (n=22, 43.1%), encompassing various forms of leadership training without specifying particular methodologies. Standards, Assessment, and Evaluation initiatives were the second most prevalent (n=15, 29.4%), focusing on developing leadership standards, implementing evaluation systems, and establishing competency frameworks. For example, Arizona mentioned their Title II-A allocation plans for standards development and implementation for teacher leaders, mentoring and induction, and supervisors of principals. Preparation/Pathways programs were implemented in 11 states (21.6%), creating structured routes into leadership positions, often targeting educators from underrepresented groups. Maryland offers job-embedded and personalized learning opportunities for assistant and aspiring principals and principal supervisors, aligning with student data and PSEL. Mentoring/Coaching initiatives appeared in 9 states (17.6%), pairing novice or struggling principals with experienced mentors. Idaho's "Idaho Principal Mentoring Project" and Missouri's "Missouri Leadership Development System" exemplify this approach, providing personalized support for leaders at critical career junctures.

Table 3. SEA activities supporting principals

States	A	B	C	D	E	F	G	H	I	J	K	Total
Alabama												0
Alaska	Y	Y			Y							3
Arizona							Y				Y	2
Arkansas			Y					Y				2
California				Y				Y				2
Colorado												0
Connecticut												0
Delaware				Y		Y						2
D.C.												0
Florida												0
Georgia		Y	Y					Y		Y		4
Hawaii	Y			Y								2
Idaho			Y									1
Illinois								Y			Y	2
Indiana								Y				1
Iowa		Y	Y								Y	3
Kansas												0
Kentucky								Y			Y	2
Louisiana									Y			1
Maine												0
Maryland						Y	Y				Y	3
Massachusetts											Y	1
Michigan						Y		Y				2
Minnesota				Y				Y				2
Mississippi		Y	Y			Y						3
Missouri			Y			Y		Y				3
Montana				Y								1

Nebraska	Y										Y	2
Nevada								Y			Y	2
New Hampshire						Y		Y				2
New Jersey								Y				1
New Mexico												0
New York		Y				Y		Y			Y	4
North Carolina								Y				1
North Dakota	Y		Y			Y					Y	4
Ohio											Y	1
Oklahoma											Y	1
Oregon						Y						1
Pennsylvania	Y	Y	Y		Y		Y	Y			Y	7
Rhode Island	Y											1
South Carolina												0
South Dakota					Y	Y		Y				3
Tennessee				Y	Y			Y	Y			4
Texas								Y	Y			2
Utah	Y			Y			Y	Y				4
Vermont												0
Virginia			Y			Y						2
Washington								Y				1
West Virginia								Y			Y	2
Wisconsin												0
Wyoming												0
Puerto Rico								Y		Y	Y	3
Totals	**7**	**6**	**9**	**7**	**4**	**11**	**4**	**22**	**3**	**2**	**15**	

* Note: A= Academies/Institutes, B= Induction/Internship, C= Mentoring/coaching, D= Networks, PLCs, or PoC (Practice of Communities), E= Partnerships F= Preparation/pathways, G= Principal supervisors, H= Professional Learning/Development, I= Residency program, J=School improvement/continuous improvement, K= Standards, assessment/evaluation, and Total = Total number of strategies

Result 4. Planning vs. Implementation Discrepancies

Our comparison of planned Title II-A spending (as documented in ESSA plans) versus actual implementation (as reported in USDE Title II-A reports) revealed notable discrepancies, suggesting significant evolution in state approaches after initial plan approval. Table 4 provides longitudinal data on actual SEA-level Title II-A reservations over four school years (2018-2019 through 2021-2022), allowing for comparison with planned allocations.

The analysis revealed three primary patterns of discrepancy between planned and actual Title II-A spending. First, we observed a pattern of discrepancy in planned versus actual SEA Reserve Maximization. While only 20 states (39.2%) explicitly planned to reserve the full 5% SEA allocation in their ESSA plans, 44 states (86.3%) actually utilized the maximum reserve by 2020-2021. This data suggests a widespread tendency for states to maximize their state-level control over Title II-A funds during implementation, potentially reflecting growing recognition of state-level capacity needs or strategic priorities that emerged after initial planning.

Second, we identified a similar trend in the area of leadership reserve expansion. Only 20 states (39.2%) initially documented plans to utilize the additional 3% leadership reserve in their ESSA plans. However, by 2021-2022, 23 states (45.1%) utilized this reserve. While this is a relatively small increase, it may suggest growing recognition that leadership became a priority while implementation progressed. States like Arizona, Missouri, Nebraska, and New Hampshire began utilizing the leadership reserve despite not including it in their original plans.

Third, we found patterns of inconsistent implementation, with several states showing significant discrepancies between planned and actual implementation. South Dakota planned a 5% SEA reserve but implemented only 0.44% in 2021-2022, representing the largest negative discrepancy. Conversely, Louisiana planned a 5% reserve and implemented 5% in 2020-2021, consistent with both their plan and statutory limits. Oklahoma similarly planned a 5% SEA reserve and implemented a 5% reserve in 2020–2021, aligning with the statutory limit.

For the leadership-specific 3% reserve, we observed a trend toward maximization during implementation. Among states utilizing this reserve, 82.6% (19 of 23) reserved at least 2.8% by 2021-2022, regardless of their initially planned amount. This finding suggests that once states committed to leadership development as a priority, they tended to maximize their investment rather than implement partial reservations.

The data reveal a clear trend toward increased utilization of Title II-A state-level reserves over time, particularly for leadership development. The percentage of states utilizing the additional leadership reserve increased from 31.4% in 2018-2019 to 45.1% by 2021-2022. This growth occurred despite declining overall Title II-A appropriations during this period, suggesting increasing prioritization of leadership development even in a constrained funding environment.

Notably, states making Title II-specific amendments to their ESSA plans were significantly more likely to utilize the leadership reserve, suggesting that formal policy revision processes often coincided with increased emphasis on leadership development. This indicates that policy revision processes may serve as important opportunities for recalibrating priorities and embracing leadership-focused funding strategies.

Table 4. Percentage of SEA reserve

States	**SEA reserve**		**SEA additional reserve**			
	SY 20-21	**SY 21-22**	**SY 18-19**	**SY19-20**	**SY 20-21**	**SY 21-22**
Alabama	5.00	4.00				
Alaska	5.00	5.00	3.00	3.00	2.80	2.85
Arizona	5.00	5.00			1.40	1.43
Arkansas	5.00	5.00	2.80	3.00	2.80	2.47
California	5.00	5.00		3.00	2.80	2.85
Colorado	5.00	5.00				
Connecticut	5.00	5.00				
Delaware	5.00	5.00				
D.C.	3.90	4.00				
Florida	5.00	5.00				
Georgia	5.00	4.00				
Hawaii	5.00	5.00				
Idaho	5.00	5.00	3.00	3.00	2.80	2.85
Illinois	5.00	5.00				

Indiana	5.00	5.00	3.00	2.90	2.80	
Iowa	5.00	5.00	3.00	3.00	2.80	2.85
Kansas	5.00	5.00				
Kentucky	5.00	5.00				
Louisiana	5.00	4.00				
Maine	5.00	5.00				
Maryland	5.00	5.00	2.80	2.80	2.80	2.85
Massachusetts	5.00	5.00	3.00	3.00	2.80	2.85
Michigan	5.00	5.00	3.00	3.00	2.80	2.85
Minnesota	5.00	5.00	3.00	3.00	2.80	2.85
Mississippi	2.09	2.00				
Missouri	5.00	5.00		3.00	2.80	2.85
Montana	5.00	5.00				
Nebraska	5.00	5.00		2.90	2.80	2.85
Nevada	5.00	5.00	2.80	3.00	2.80	2.85
New Hampshire	5.00	5.00			1.90	2.82
New Jersey	5.00	5.00				
New Mexico	5.00	5.00	3.00	3.00	2.80	2.81
New York	5.00	5.00	3.00	3.00	2.80	2.85
North Carolina	3.48	3.00				
North Dakota	5.00	5.00			2.80	2.82
Ohio	5.00	5.00	3.00	3.00	2.80	2.85
Oklahoma	5.00	5.00				0.00
Oregon	5.00	5.00				0.00
Pennsylvania	5.00	5.00		3.00	2.80	2.85
Rhode Island	5.00	5.00				
South Carolina	5.00	5.00	3.00	3.00	2.60	2.85
South Dakota	5.00	0.44				
Tennessee	2.14	1.95	3.00	2.90	2.80	2.78
Texas	5.00	5.00	3.00	3.00	2.80	2.78
Utah	5.00	5.00	2.00	3.00	2.80	2.69
Vermont	4.00	5.00				
Virginia	5.00	4.27				
Washington	5.00	5.00				
West Virginia	3.00	2.00				2.00
Wisconsin	5.00	5.00	2.80	2.80	2.80	2.69
Wyoming	5.00	5.00	3.00	3.00	2.80	2.85

*note. The SEA reserve percentage represents the proportion of Title II funds each state set aside, as reported in the federal data. We calculated the percentage by dividing the amount each state reserved by its total annual Title II allocation, as listed on the USDE website. Under federal guidelines, SEAs are allowed to reserve up to 5% of their total Title II-A funds for state-level activities, with an additional allowance of up to 3% specifically for leadership development.

Discussion

The findings from this comprehensive and novel analysis of Title II-A implementation across all 50 states and D.C. reveal several critical insights that advance our understanding of fiscal federalism in educational leadership policy. Our results demonstrate substantial heterogeneity in state approaches to Title II-A implementation, from the amount reserved at the state level to the specific leadership development strategies employed. This variation aligns with the fiscal federalism framework, illustrating how federal policy creates space for state-level adaptation and innovation rather than producing uniform implementation. The extent of this heterogeneity was evident not only in the numerical distributions but also in the qualitative approaches to leadership development, with states demonstrating distinct orientations toward building leadership capacity—from comprehensive multi-strategy approaches to more focused investments in specific areas like professional learning or mentoring programs.

Our data reveal a trend toward increasing prioritization of leadership development over time, with more states utilizing the leadership-specific reserve and implementing structured development programs as implementation progressed. The gradual increase in leadership reserve utilization from 31.4% of states in 2018-2019 to 45.1% by 2021-2022 suggests an evolutionary policy learning process wherein states increasingly recognized the strategic value of leadership investments, even as overall Title II-A funding faced threats of reduction at the federal level. This pattern indicates that states may be learning from early implementation experiences and adjusting their approaches based on emerging evidence about the importance of leadership development for educational improvement.

However, our analysis also identified notable gaps between planning and implementation, with many states significantly revising their approach to Title II-A allocation and utilization after their initial plans were approved. While only 20 states (39.2%) explicitly planned to reserve the full 5% SEA allocation in their ESSA plans, 44 states (86.3%) actually utilized the maximum reserve by 2020-2021. This discrepancy highlights the dynamic nature of policy implementation and suggests that formal plans may provide only partial insight into actual state practices and priorities. The evolution of implementation approaches without corresponding formal plan amendments raises important questions about the transparency and accountability mechanisms within the Title II-A policy framework, particularly given the federal investment in state planning processes.

This shift exemplifies the dynamic nature of fiscal federalism in American education policy. Rather than representing a simple retreat of federal influence, ESSA reconfigured the intergovernmental relationship by maintaining federal funding and general guidelines while expanding state discretion in implementation (Egalite et al., 2017; Fuller et al., 2017). This evolution reflects what Manna (2006) has described as "borrowing strength," wherein federal authorities leverage state capacity while states utilize federal authority to advance educational objectives that neither level could achieve independently. Our findings demonstrate this principle in action, as states adapted their Title II-A approaches based on local contexts and emerging priorities while working within federal parameters.

Our analysis revealed significant potential in Title II's leadership development provisions, representing both a challenge and an opportunity for educational policy. Even by 2021-2022, less than half of states (45.1%) were utilizing the additional leadership reserve, and 19.6% of states documented no specific leadership development activities in their ESSA plans. This finding suggests substantial opportunity for growth in targeted leadership investments across many states, particularly given the widespread recognition of leadership importance in educational improvement literature. The contrast between universal acknowledgment of leadership significance and the limited implementation of targeted funding mechanisms represents a puzzling disconnect in policy implementation that warrants further investigation and targeted technical assistance from federal and state agencies.

The implications of these findings extend beyond Title II-A to broader questions of educational policy implementation and fiscal federalism. For policymakers, our results suggest that federal education policy may benefit from more flexible implementation frameworks that acknowledge the evolutionary nature of state-level policy learning. The significant discrepancies between planned and actual implementation indicate that states may need more opportunities to revise and refine their approaches as they gain experience with federal programs. For SEAs, the findings highlight the importance of strategic planning processes that build in opportunities for adjustment and learning, while also suggesting the value of peer learning networks, where states can share effective practices for leadership development.

Limitations

Despite our effort to provide a comprehensive understanding of Title II-A funding via thorough document analysis, there are some limitations that require caution. Firstly, there is the possibility of bias and inaccuracy embedded in the document (Morgan, 2022; Scott, 2014; Tisdell et al., 2025). Documents may reflect political agendas or bureaucratic priorities rather than objective policy needs. Even when used as sources, documents' credibility and authors' intentions must be reviewed (Karppinen & Moe, 2012). Additionally, there is the issue of "biased selectivity" (Yin, 2009, p. 80), as the availability of documents may be shaped by organizational interests or other influences (Cardno, 2018). Since not all documents—especially recent amendments or addenda—were accessible on every state's website, our analysis may be affected by selective availability and incomplete information.

In addition, there is a need not to overstate the 'natural' and non-reactive character of the documents we deal with as policy researchers (Karppinen & Moe, 2012). Although documents are produced regardless of researchers' perceptions and attitudes, researchers need to reflect on their possible biases and stereotypes. Lastly, as most documents somehow reflect the process that has produced them, there is a need to be aware of the context and the social surroundings of the document in question to grasp its meanings and significance (Altheide & Schneider, 2012; Cardno, 2018). Therefore, since relying solely on pre-existing texts may not provide sufficient content to conduct a comprehensive study (Tisdell et al., 2025), the interpretation of policy decisions may be limited without the addition of supplementary data.

Conclusion

This study provides a comprehensive national analysis of Title II-A implementation patterns under ESSA, revealing both the promise and challenges of fiscal federalism in educational leadership policy. Our findings demonstrate that while federal policy creates important opportunities for leadership development investment, the realization of this potential depends heavily on state-level priorities, capacity, and commitment to ongoing policy learning. The substantial variation in state approaches, combined with the trend toward increased leadership focus over time, suggests that Title II's flexible framework is working as intended—

allowing states to adapt federal resources to local contexts while gradually building recognition of leadership development as a strategic priority.

However, the significant gaps between planning and implementation, along with the underutilization of leadership-specific funding mechanisms by many states, indicate that both federal and state agencies have important work to do in supporting more effective and transparent implementation of Title II's leadership development provisions. The growing state investment in leadership development documented in this study occurs against a backdrop of persistent federal uncertainty about Title II-A's future. There is a need to recognize these utilization trends as evidence of the program's strategic value and work to provide the funding stability necessary for effective long-term leadership development planning.

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