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Mandatory Regionalization and Its Limits: How California Districts Experience and Navigate Special Education Governance

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Mandatory Regionalization and Its Limits: How California DistrictsExperience and Navigate Special Education Governance

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This study examines how California governs special education through regional educational services agencies called special education local plan areas (SELPAs). Special education governance is the coordination, funding, and oversight of services across state, regional, and local educational agencies (LEAs) under the Individuals with Disabilities Education Act (IDEA). Most U.S. LEAs participate in regional service arrangements to access specialized programs (Doutre et al., 2021b; Stephens & Keane, 2005). California has a unique regional model where membership is mandatory and SELPAs administer special education funding across groups of LEAs. Examining SELPAs provides a case for understanding the benefits and limitations of mandatory regional governance in special education.

Special education spending in California has more than doubled since 2004–05 and now represents roughly 20 percent of total student spending (Bruno, 2026). A series of state and independent reports have raised concerns about transparency, equity, and accountability in how SELPAs allocate resources among member LEAs (Doutre et al., 2021a; Doutre et al., 2021b; Hill et al., 2016; Warren & Hill, 2018). Central to these concerns is California's distinctive funding structure. State and federal special education dollars flow to SELPAs rather than directly to LEAs. SELPA administrators and governing boards, composed of member LEA superintendents or their designees, determine how these funds are divided between regional operations and allocations to individual LEAs. This arrangement distinguishes California from other states, where special education funds flow directly to LEAs, which may participate in voluntary resource-sharing consortia (Doutre et al., 2021a; Doutre et al., 2021b). Prior reports questioned whether all LEAs benefited equitably from SELPAs, whether SELPA administrative costs were justified by the value of services provided, and whether LEAs had meaningful voice in SELPA governance (Hill et al., 2016;Doutre et al., 2021a; Doutre et al., 2021b; Doutre et al., 2021c).

Through a mixed-methods case study drawing on newly standardized SELPA financial data from 2024–25 and interviews with a stratified sample of LEA special education administrators, this study examines three questions:

1. How do SELPAs allocate special education funds between regionalized coordination functions and direct LEA allocations, and how does this vary across SELPA types?

2. What governance functions do LEA special education administrators identify as the primary value of regional cost sharing, and how consistently are these functions performed across SELPAs?

3. How do LEAs construct alternative governance arrangements when SELPA coordination capacity is insufficient or misaligned with local needs?

We document that SELPAs support a range of regionalized functions—including data reporting, alternative dispute resolution, and specialized programs—and that total SELPA-level expenditures substantially exceed the state funding allocated for Program Specialist and Regionalized Services (PS/RS), the state's dedicated funding stream for regionalized operations and program specialist support. Because these expenditures may include both administrative functions and shared service provision, they cannot be directly mapped onto specific activities unless a SELPA chooses to provide that level and type of detail within the open response section of the CDE template. As a result, the state lacks visibility into how much is spent on SELPA administration versus service delivery, as well as the extent and nature of services LEAs receive across regions. In interviews we observe substantial variation across SELPAs in the services and support provided to LEAs. In response, LEAs develop parallel cost-sharing arrangements outside SELPA structures and may be exposed to legal liabilities when SELPA supports are insufficient or misaligned with local needs. Our findings point to potential policy adjustments that might improve quality and consistency within California's special education governance system and guide other states seeking to regionalize special education services (e.g., Center for Learner Equity, 2024).

The paper proceeds as follows: we review relevant concepts and prior research, describe the case of California's SELPA system, present data and methods, report findings, and conclude with policy implications. The empirical contribution of this study is descriptive: it documents the fiscal scale of SELPA regionalized operations and examines how LEA administrators interpret the coordination functions associated with those expenditures.

Background

Why Regional Governance Exists in Special Education

Regional cooperation is an established strategy for ensuring all students have access to education services that individual LEAs cannot efficiently provide on their own. Most states in the U.S. rely on some form of regional service structure, including educational service agencies, cooperatives, or intermediate units, to support LEAs in delivering specialized services and managing administrative responsibilities (Stephens & Keane, 2005). Special education is one of the most common domains in which these arrangements operate because of the complexity of services required and uneven and unpredictable demand for services across LEAs (Bailey & Zumeta, 2015; Roza, 2015; Warren & Hill, 2018).

A central rationale for regional cooperation in education is *economies of scale*. Certain educational services involve fixed costs related to specialized staff, facilities, training, and administrative oversight that are more cost efficient when distributed across larger student populations (Andrews et al., 2002). These dynamics are particularly salient in special education. Under the Individuals with Disabilities Education Act (IDEA), LEAs must provide a free appropriate public education (FAPE) to every eligible child regardless of cost. Low-incidence disabilities, such as deafness or blindness, create unpredictable demand for highly specialized services that may serve only a few students in each LEA. This volatility creates fiscal and staffing challenges in smaller or geographically dispersed systems in particular. Regional cooperation allows LEAs to pool resources to support students with these disabilities through programs, staff, and expertise that would be difficult for many LEAs to sustain independently (Billingsley & Bettini, 2019; Rude & Miller, 2018; Ruppar et al., 2024; Toman & Maag, 2024).

Although regional cost sharing in special education is theoretically justified by economies of scale, empirical evidence on its fiscal effects remains limited and mixed. Research on mandated consolidation of non-instructional services in Michigan found inconsistent effects on overall spending (DeLuca, 2013), and studies of Washington's regional service agencies document substantial variation in expenditures and spending priorities across agencies (Endsley et al., 2014). Research on intergovernmental service consolidation shows that scale effects depend on the type of service, the governance structure through which consolidation occurs, and the degree of heterogeneity among participating jurisdictions (Holzer et al., 2009). These findings suggest that the outcomes of regional governance depend on institutional design, service mix, and local context rather than scale alone. Yet relatively little research examines how funds are actually allocated within regional arrangements — specifically, how much flows toward regionalized coordination functions versus direct LEA allocations, and whether this varies systematically across different types of regional structures. This motivates our first research question: *How do SELPAs allocate special education funds between regionalized coordination functions and direct LEA allocations, and how does this vary across SELPA types?*

What Regional Agencies Do — and How LEAs Experience It

Regional agencies in special education perform a range of distinct functions. Nationally, educational service agencies operate low-incidence programs, coordinate itinerant specialist services, provide professional development, and support compliance and fiscal management (Firestone, 1983; Stephens & Keane, 2005). Research on educational service agencies has traditionally emphasized the service provision function, documenting the specialized programs and itinerant services that regional agencies supply (Stephens & Keane, 2005; Sundeen, 2022). Yet regional agencies also perform coordination functions such as convening LEA leaders, disseminating regulatory guidance, facilitating dispute resolution, and brokering relationships with external providers. These activities are organizationally distinct from direct service delivery and may represent a substantial share of regional agency activity (Agranoff, 2007; Feiock, 2013; Provan & Kenis, 2008). In this paper, these roles are treated as analytically distinct. Regional service provision refers to programs and specialized services directly operated or contracted through the regional entity, while regional coordination refers to

governance activities such as convening LEAs, disseminating regulatory guidance, facilitating problem solving, and managing relationships across jurisdictions.

Regional governance arrangements in education often operate as networks of interdependent organizations where multiple organizations share responsibility for delivering services, coordinating resources and expertise, and meeting regulatory requirements across jurisdictions (Agranoff, 2007; Provan & Kenis, 2008; Van Den Oord et al., 2023). Some networks are organized to directly produce or deliver services to achieve economies of scale while others focus on facilitating information exchange, managing relationships, and supporting collective problem-solving without directly producing services themselves (Feiock, 2013). The presence of regional services does not guarantee their usefulness or consistency. At least one study suggests that regional agency effectiveness depends less on organizational scale than on program quality, leadership, and responsiveness to LEA needs (Nafukho et al., 2009).

Establishing effective accountability policies for educational service agencies is a challenge nationally (Stephens & Keane, 2005). Although representative boards or superintendent councils are intended to ensure LEA voice, formal representation does not necessarily translate into meaningful influence over priorities or resource allocation (Firestone et al., 1983; Warren & Hill, 2018). Moreover, when legal responsibility and operational control for special education are distributed across different organizations, it can be challenging for the public to identify which is accountable for outcomes (Milward & Provan, 2006). Despite the central role regional agencies play in special education governance, relatively little research examines how LEAs evaluate the governance functions these agencies perform. Prior studies primarily document the services regional agencies provide or analyze aggregate expenditure patterns, offering limited insight into how local leaders assess the value of regional coordination or how consistently coordination functions are performed across regional structures (Hill et al., 2016; Doutre et al., 2021a; Doutre et al., 2021b). This motivates our second research question: *What governance functions do LEA special education administrators identify as the primary value of regional cost sharing, and how consistently are these functions performed across SELPAs?*

When Regional Arrangements Fall Short

Regional cooperation among LEAs is typically voluntary, but a state might mandate participation in a regional network when voluntary cooperation is insufficient or unlikely, such as when participation incentives are asymmetric across LEAs of different sizes and resource levels (Feiock, 2013; Shrestha & Feiock, 2011). Smaller or rural LEAs often depend more heavily on shared programs and itinerant expertise, whereas larger or more resourced LEAs may maintain greater internal capacity (Bailey & Zumeta, 2015; Roza, 2015; Tooley & Prescott, 2021; Rude & Miller, 2018). When these incentives diverge, voluntary cooperation may fail to produce stable collaborative systems. California's SELPAs represent one such mandated arrangement. State law requires every LEA to belong to a SELPA unless it is of sufficient size to operate as a single-LEA SELPA.

Challenges can arise in mandated networks when member organizations cannot reshape network priorities or exit arrangements that do not serve their needs (Provan & Kenis, 2008). Under these conditions, formal governance structures may not capture how coordination actually operates in practice if organizations develop informal arrangements that work around official channels (Hirschman, 1970; Rodríguez et al., 2007; Milward & Provan, 2006). Understanding both formal and informal approaches to resource sharing can give a more reliable picture of LEA motivations and responses when regional capacity is insufficient or misaligned with local needs. This motivates our third research question: *How do LEAs construct alternative governance arrangements when SELPA coordination capacity is insufficient or misaligned with local needs?*

The Case: California's SELPA System

This study treats California's SELPA system as a case through which to examine how mandatory regional governance structures function in practice. SELPAs were established in California to organize and administer special education and related services (§56195). Through the SELPA structure, the state delegates responsibility for allocating state and federal special education funding, coordinating service provision, and ensuring compliance across groups of LEAs. Each SELPA must submit to the state a

county-approved plan that specifies governance roles, methods for distributing funds, and the scope of regionalized supports.

SELPAs emerged in the 1970s amid expanding special education mandates. The Education for All Handicapped Children Act of 1975 (Pub. L. No. 94-142) required LEAs to submit substantive applications for federal special education funds, and California's SELPA model offered a regional mechanism for coordinating the planning and compliance obligations those mandates imposed. Although subsequent IDEA reauthorizations shifted toward assurance-based eligibility and monitoring at the federal level, California retained the SELPA model in state law. Today, every LEA must belong to a SELPA unless it qualifies for — and receives approval to operate as — a single-LEA SELPA. As a result, SELPAs remain the foundational unit of special education governance in California.[1]

Three Types of SELPAs — and Why the Single-LEA Distinction Matters

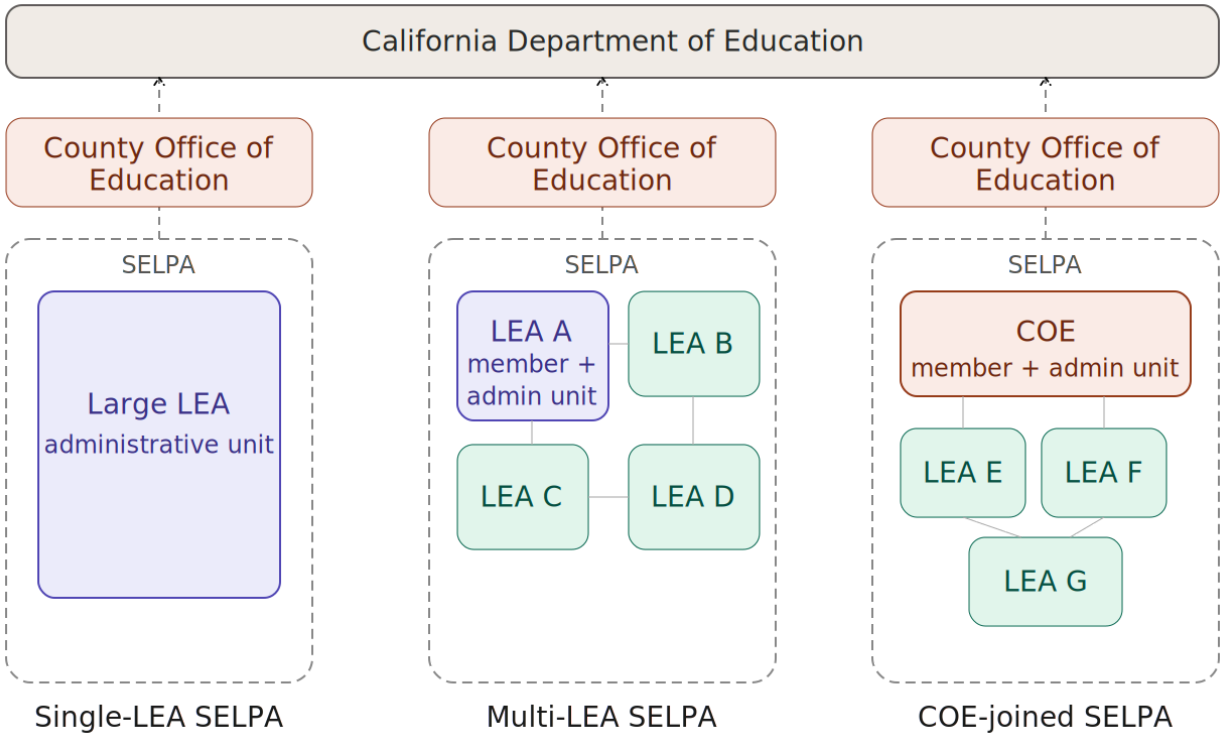
California recognizes three SELPA structures: single-LEA, multi-LEA, and county office of education (COE)-joined SELPAs. These structures differ both in their membership composition and in governance. Single-LEA SELPAs operate within large LEAs that meet state enrollment thresholds; they function similarly to internal special education departments and, apart from the local plan requirement, are not structurally distinct from LEAs in other states. Multi-LEA SELPAs consist of groups of LEAs that jointly administer special education without a COE as a member. COE-joined SELPAs include a COE as a member and are the most common structure statewide. A California COE is a county-level agency that helps LEAs by offering student programs, shared services (like curriculum and business support), and financial oversight; every one of California's 58 counties has one (See Trinidad et al., 2026 for additional information about COEs in California).

The SELPA administrative unit, either a large LEA in multi-LEA SELPAs or the COE in COE-joined SELPAs, serves as the operational core of the SELPA. The administrative unit employs the SELPA director, receives all state and federal special education funds on behalf of member LEAs, and is responsible for

[1] Previously, an LEA could give a year's notice and then leave its SELPA to join a different one or establish its own, but the California state legislature has had a moratorium on developing single-LEA SELPAs since July 1, 2020. This moratorium has been extended once but is set to expire in July 2026.

meeting state requirements governing regional coordination. The three SELPA types are illustrated in Figure 1. COEs occupy an intermediate position in the figure because they exercise approval authority over SELPA Local Plans, but this authority is subject to state override on appeal.

Figure 1: SELPA types with members and administrative units.



In 2024-25, 61 percent of students receiving special education services were enrolled in LEAs belonging to COE-joined SELPAs. An additional 12 percent were served in multi-LEA SELPAs, and 27 percent in single-LEA SELPAs (Table 1). Although single-LEA SELPAs account for over one-quarter of statewide enrollment, they represent a relatively small number of large LEAs, reflecting state-imposed enrollment thresholds for independent operation. For the purposes of this analysis, the most consequential distinction is between single-LEA SELPAs, which function as internal administrative units, and all other SELPAs, which operate as interorganizational governance structures.

While both multi-LEA SELPAs and COE-joined SELPAs contain more than one LEA, they differ in membership and context. Muli-LEA SELPAs only occur in counties with more than one SELPA while

COE-joined SELPAs may be the only SELPA in the county. This contextual difference may shape coordination, including geographic scale and the availability of regional services providers. Differences in membership and context do not appear to fundamentally alter the core functions SELPAs perform.

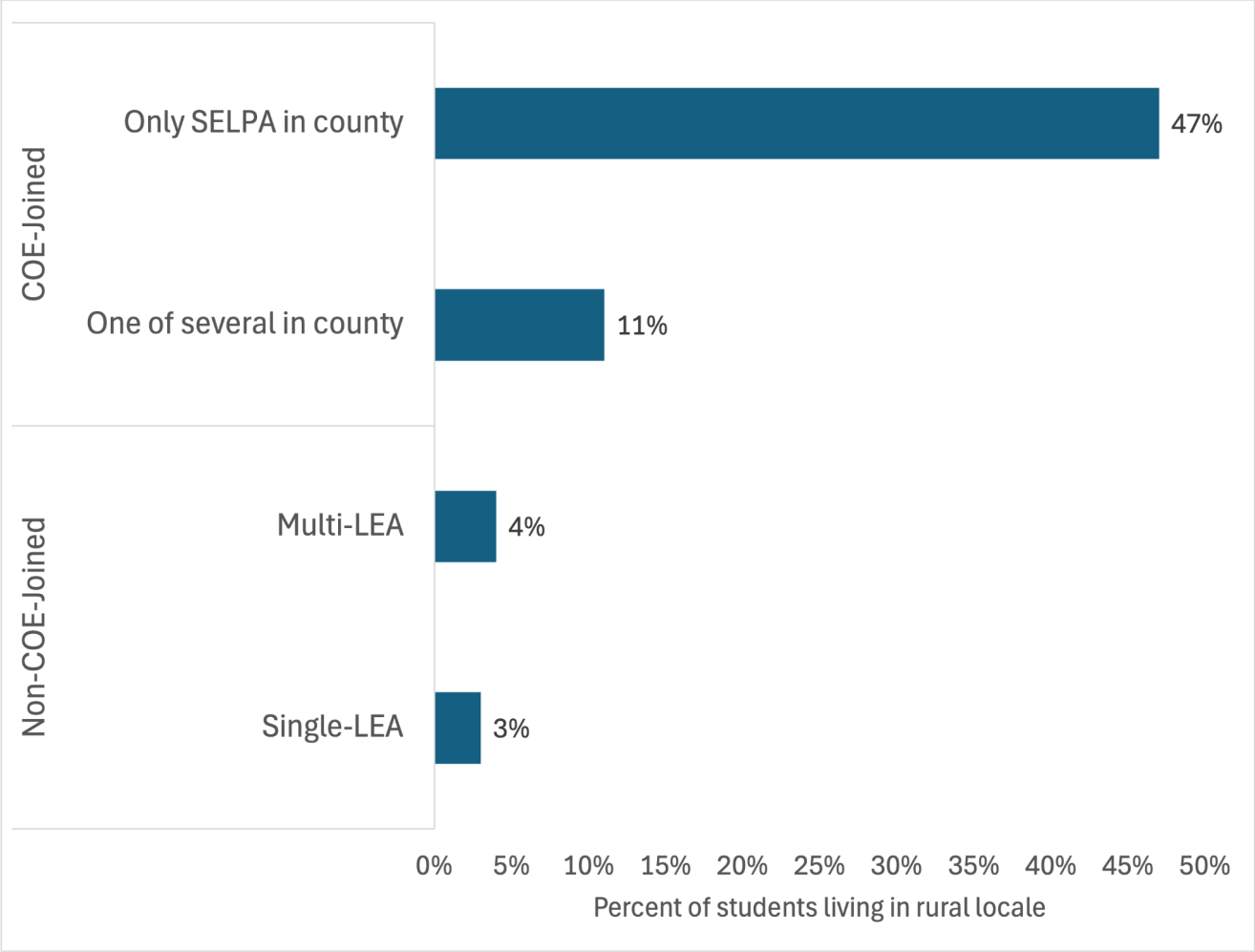
Table 1: Selected information on SELPAs, LEAs, ADA, and Rurality by SELPA Type, 2024-25 School Year

SELPA Type	# of SELPAs	# of LEAs	Average # of LEAs	Total ADA	% of all ADA	% Students living in rural locale
All Non-COE-Joined	***66***	***163***	***2***	***2,650,452***	***39%***	**3%**
Multi-LEA	19	113	6	820,721	12%	4%
Single-LEA	47	50	1	1,829,730	27%	3%
All COE-Joined	***66***	***1491***	***23***	***4,085,650***	***61%***	**32%**
One of several in county	28	894	32	3,084,456	46%	11%
Countywide SELPA	38	597	16	1,001,194	15%	47%

Countywide SELPAs and Rural Context

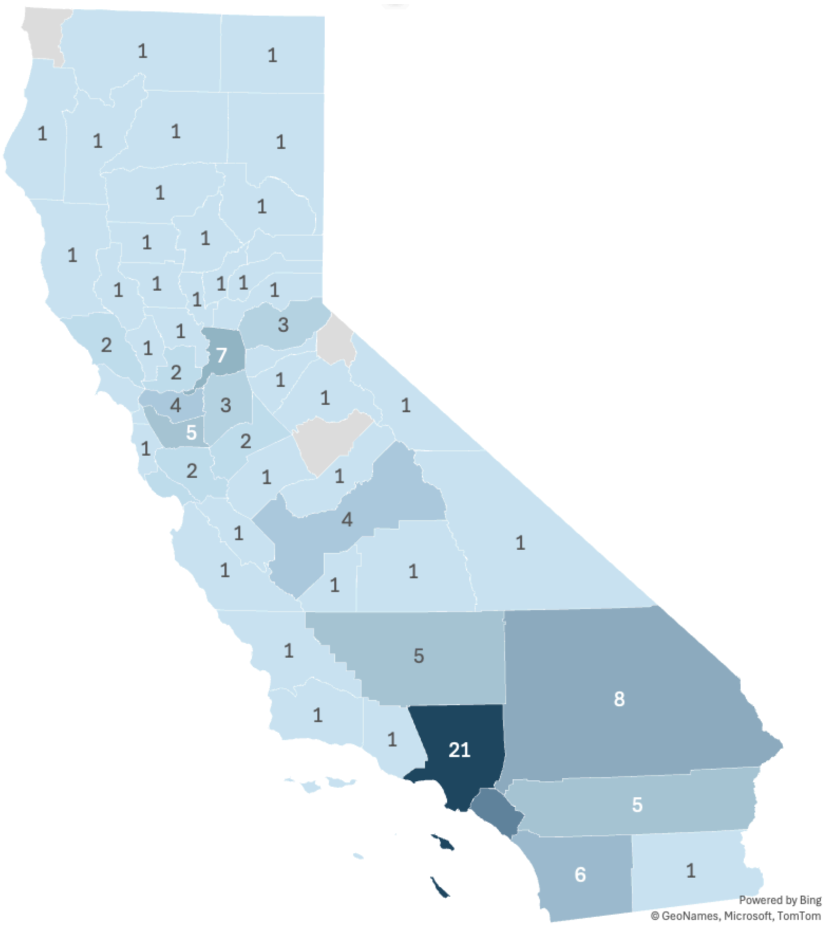
Most California counties (38 of 58) contain a single SELPA. Nearly one million students are served by these COE-joined countywide SELPAs. Countywide SELPAs are unique because they bear responsibility for coordinating regional services, managing compliance across member LEAs, and maintaining the administrative infrastructure of special education governance for an entire county. Countywide SELPAs also tend to be more rural than other SELPAs. On average, countywide SELPAs serve approximately 26,000 students across 16 LEAs, and nearly half of students in these counties live in rural areas (Figure 2).

Figure 2: Share of students enrolled in a rural school, by SELPA type



Multi-SELPA counties — concentrated in Southern California — include large metropolitan areas such as Los Angeles County (21 SELPAs) and Orange County (13 SELPAs). In most of these counties, a majority of SELPAs are single-LEA SELPAs: for instance, 8 of 13 SELPAs in Orange County, 6 of 7 in Sacramento County, and 4 of 5 in Riverside and Kern County are single-LEA SELPAs. Figure 3 shows the number of SELPAs per county in the 2024-25 school year.

Figure 3: Number of SELPAs per County, 2024-25 School Year



Policy Changes and Governance Debates Affecting California's SELPA System

Over the past decade, California has undertaken significant reforms to its finance and accountability systems, reshaping the policy context in which SELPAs operate. The Local Control Funding Formula (LCFF), implemented in 2013–14, consolidated most categorical programs into a weighted student-based formula and directed additional resources to LEAs serving higher concentrations of historically underserved students. Although special education funding remained outside LCFF, students with disabilities were incorporated into LCFF's accountability framework through

the Local Control and Accountability Plan (LCAP) process. This shift signaled a policy commitment to aligning expectations for outcomes across general and special education, even as funding streams remained separate.

The 2015 ONE SYSTEM report recommended closer alignment between special education and general education finance and greater local control over funds generated for students with disabilities (Statewide Task Force on Special Education, 2015). Subsequent policy analyses questioned whether existing governance arrangements continued to align with California's evolving policy goals, particularly its emphasis on integrating general and special education systems and improving transparency in funding and accountability (Hill et al., 2016; Warren & Hill, 2018).

During the same period, the state received increasing requests from LEAs seeking to exit their SELPAs to establish single-LEA SELPAs. Stakeholders raised concerns that widespread exits could destabilize regional support systems, particularly for small and rural LEAs that depend most heavily on SELPA coordination. In response, the legislature imposed the first moratorium on new single-LEA SELPA applications on July 1, 2020, later extended through June 2026 (California Department of Education [CDE], 2024a).

Also beginning in 2020, California enacted substantial changes to its special education finance system, setting a new base rate per ADA and restructuring how apportionments were calculated for each SELPA (CDE, 2024a). These reforms were informed by analyses from the Legislative Analyst's Office, the Public Policy Institute of California, and WestEd, and the legislature commissioned the Special Education Governance and Accountability Study to examine SELPA oversight and governance structures more broadly. In that same year, SELPA local plans were required to follow a standardized format for the first time (CDE, 2024b).

The state continued to build on these foundations in subsequent years. Beginning in 2022–23, the legislature shifted the base for special education funding calculations from SELPA-wide average daily attendance (ADA) to the ADA of each individual member LEA, and again increased the base rate per ADA (CDE, 2024b). The legislature also required SELPAs to report to each member LEA the amount

of funding that LEA generates — a transparency measure directly responsive to prior concerns about accountability in SELPA resource allocation (Hill et al., 2016; Doutre et al., 2021b).

In 2023-24, the legislature added additional guardrails to SELPA fiscal autonomy by establishing a minimum pass-through floor, prohibiting SELPAs from allocating less to member LEAs than the prior year's total base grant adjusted for inflation and changes in funded ADA (CDE, 2025). The legislature preserved LEA discretion to voluntarily contribute funds back to the SELPA for regionalized or programmatic services (CDE, 2025). In 2023-24, the legislature also shifted funding for mental health services from SELPAs directly to LEAs and required the Superintendent to post all SELPA local plans on the CDE's website, though plans were not available there at the time of data collection for this study (summer 2025). Running alongside these fiscal reforms was a parallel governance initiative to streamline the multiple special education reporting structures with an LCAP addendum, but it was deferred and ultimately abandoned.

Taken together, these reforms reflect sustained legislative attention to SELPA fiscal transparency and LEA equity in special education resource allocation, alongside deferral on the governance mechanism most directly aimed at connecting regional coordination to LEA-level fiscal and programmatic planning. This institutional context frames the three research questions examined in this study and structures the data collection and analysis described below.

Data Sources and Methods

We use a mixed-methods case study design, treating California's SELPA system as a bounded case through which to examine how mandatory regional governance structures function in practice (Merriam & Tisdell, 2015). Rather than making causal claims, the study develops a theoretically grounded account of regional governance functions and LEA experience to inform policy and future research. Quantitative and qualitative data are integrated as complementary sources of evidence (Creswell & Plano Clark, 2017).

The quantitative component consists of a cross-sectional descriptive analysis of publicly available SELPA local plans and budget documents. Because inconsistent financial reporting limited

systematic analysis prior to 2021–22, these newer documents make it possible to examine how special education funds are distributed between SELPA-level regionalized operations and direct LEA allocations across SELPA structures.

The qualitative component draws on semi-structured interviews with a stratified sample of LEA special education administrators, a group underrepresented in prior research despite their central role in overseeing local programs and liaising with SELPAs. Together, these data provide both a fiscal portrait of the system and interpretive depth on how mandated regional governance functions in practice.

Quantitative Data Collection and Analysis

We analyze SELPA budget plans to examine how funds are allocated between regionalized operations and LEA distributions. The quantitative data source consisted of publicly available SELPA local plans, specifically the Annual Budget Plan (Section D), manually collected from SELPA websites between June and August 2025. The unit of analysis was the SELPA.

In multi-LEA and COE-joined SELPAs, the SELPA administrative unit jointly determines with the governing board how to allocate and distribute state and federal (IDEA) special education funds among member LEAs, as well as how much funding to retain at the SELPA level to coordinate and provide regional programs and services. These allocation decisions must be described annually in a SELPA Budget Plan, which reflects all projected special education expenditures across member LEAs as well as projected expenditures incurred for the SELPA regionalized operations.

The regionalized operations section of a SELPA budget plan includes expenditures for services and functions provided centrally on behalf of member LEAs rather than passed through as allocations. These commonly include SELPA administration, program specialists and technical assistance staff, and staff and materials serving students with low-incidence disabilities. Because budget plans do not consistently disaggregate coordination functions from service provision activities, the analysis focuses on the total scale of regionalized spending.

For each SELPA, we extracted total expenditures and regionalized operating expenditures from the local plans and calculated expenditures per ADA across major object categories. At the time of data collection, 136 SELPAs were operating in California. Four state-operated SELPAs were excluded due to their distinct governance structures. Twelve SELPAs did not have a publicly posted Annual Budget Plan and were therefore excluded, as this section reports planned expenditures by object and identifies planned regionalized operating expenses. [2]

Due to variation in posting practices, the sample contained plans from 2023–24, 2024–25, and 2025–26. When multiple years were available, we selected 2024–25 data to maximize temporal consistency. The final sample included 7 plans from 2023–24, 76 from 2024–25, and 37 from 2025–26. Although total expenditures may fluctuate across fiscal years due to enrollment changes, cost-of-living adjustments, or one-time allocations, this study focuses primarily on the proportion of total expenditures retained for regionalized operations rather than absolute spending levels, which reduces the consequences of cross-year variation.

These data were paired with publicly available LEA-level ADA for 2024–25, the primary basis for calculating AB 602 allocations. LEA-level ADA was aggregated to the SELPA level to construct total ADA per SELPA. Additional contextual variables included SELPA type (COE-joined, multi-LEA, or single-LEA), county location, and percentage of students living in rural locales.

Qualitative Data Collection and Analysis

We conducted semi-structured interviews with LEA special education administrators to examine how LEAs experience their SELPA. Using a stratified sampling approach, we recruited LEAs from all but single-LEA SELPAs. Single-LEA SELPAs were excluded from the qualitative sample because, as described above, they function as internal administrative structures rather than interorganizational networks and are therefore outside the theoretical scope of this study.

[2] The SELPAs that had not posted budget data at the time of collection were disproportionately rural: approximately half were located in rural counties adjacent to other counties with only a single countywide SELPA. If these omitted SELPAs are systematically more geographically isolated, more efficiently operated, or more extensively collaborative with adjacent SELPAs, the results presented here may not fully capture that range of variation. However, because the final analytic sample included 120 SELPAs — nearly 90 percent of the 136 operating statewide — the patterns described in this analysis are unlikely to change substantially had the remaining SELPAs been included.

Contact information for a stratified random sample of 101 special education administrators was obtained from LEA websites. In cases where an LEA did not employ a dedicated special education director, we contacted the superintendent or director of educational services. Each potential participant received up to three contact attempts by email or phone and was offered a $25 gift card as a modest participation incentive. The resulting nine interviews reflect the difficulty of recruiting senior administrators through cold outreach for time-intensive participation. While this sample does not support claims about the prevalence of particular views across LEAs, it does provide analytically useful insight into how administrators with direct responsibility for special education understand the functions, benefits, and limitations of regional coordination in practice.

Participants were LEA special education directors (n=6) and superintendents (n=3) (Table 2). Interviews focused on participants' experiences accessing SELPA services, perceptions of service adequacy and responsiveness, and views of LEA influence over regional decision-making (see Appendix C for protocol). The sample is weighted toward small and rural LEAs in countywide SELPAs, reflecting both the stratified sampling design and response patterns. Accordingly, the findings are most informative about how SELPA governance is experienced in smaller LEAs with limited internal capacity, particularly with respect to the value of administrative and compliance expertise, thin labor markets for specialized staff, and reliance on SELPA coordination capacity. Administrators in larger or more highly resourced LEAs may experience these governance functions differently. The nine interviews span eight SELPAs across six counties and are therefore used to provide illustrative, context-specific accounts of regional governance in practice rather than representative estimates of statewide administrator perceptions.

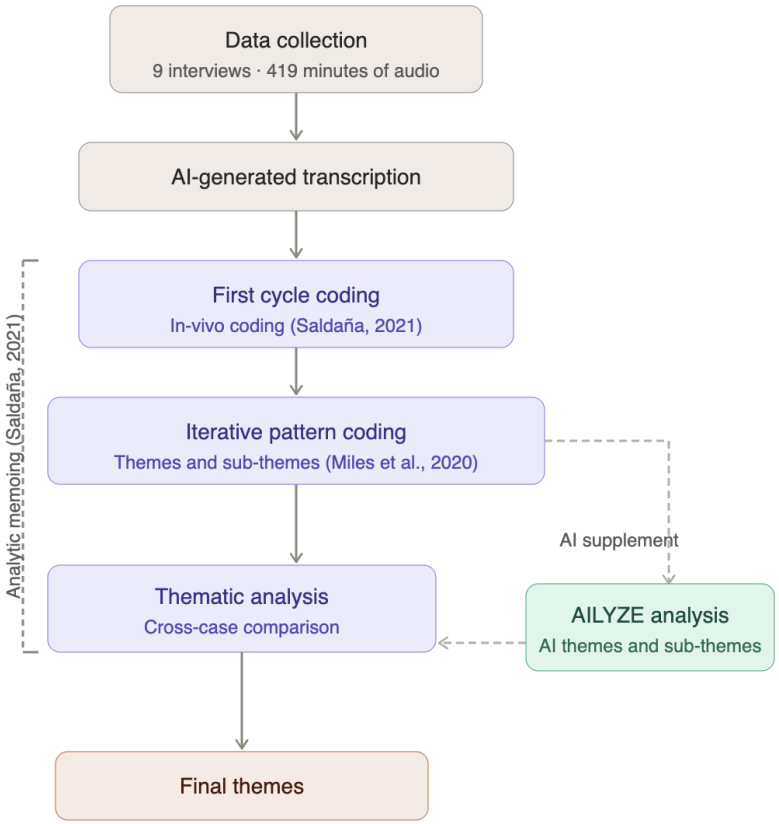
Table 2: Number of Interviews by SELPA, County, and LEA Types

SELPA Type	County Type	National Center for Education Statistics Locale	Number of Interviews
COE-joined	Multi-SELPA County	Midsize, suburban[3]	1
COE-joined	Multi-SELPA County	Large, suburban[4]	1
COE-joined	Multi-SELPA County	Rural, fringe[5]	1
COE-joined	Countywide SELPA	Rural, distant[6]	1
COE-joined	Countywide SELPA	Small, city[7]	2
COE-joined	Countywide SELPA	Rural, fringe	2
Multi-LEA	Multi-SELPA County	Large suburban	1

Interviews generated 419 minutes of recorded audio, which was transcribed and prepared for coding. First-cycle coding produced 150 in-vivo codes capturing administrator perceptions of SELPA services, governance arrangements, and LEA responses to gaps in regional capacity (Saldaña, 2021). These codes were consolidated into themes through iterative pattern coding and analytic memoing (Miles et al., 2014; Saldaña, 2021). Once manual coding and thematic analysis were complete, deidentified transcripts were uploaded into AILYZE, an AI-powered qualitative data analysis platform that supports content, thematic, and cross-group analyses. The AI-generated analysis was used to assess alignment with the first author's themes and sub-themes and to enhance analytic reflexivity. All AI-generated codes were manually cross-checked and revised by the first author.

[3] Territory outside a Principal City and inside an Urbanized Area with population less than 250,000 and greater than or equal to 100,000.
[4] Territory outside a Principal City and inside an Urbanized Area with population of 250,000 or more.
[5] Census-defined rural territory that is less than or equal to 5 miles from an Urbanized Area, as well as rural territory that is less than or equal to 2.5 miles from an Urban Cluster.
[6] Census-defined rural territory that is more than 5 miles but less than or equal to 25 miles from an Urbanized Area, as well as rural territory that is more than 2.5 miles but less than or equal to 10 miles from an Urban Cluster.
[7] Territory inside an urbanized area and inside a principal city with population less than 100,000.

Figure 4: Qualitative data analysis process.



Findings

This section presents findings on how SELPAs allocate resources and how LEAs experience SELPA governance functions, drawing on financial and interview evidence. We document that SELPAs support a range of regionalized functions—including data reporting, alternative dispute resolution, and specialized programs—and that total SELPA-level expenditures substantially exceed the state funding allocated for program specialists and regionalized operations. While most administrators we spoke with were satisfied with their SELPA, we also observe substantial variation across SELPAs in the services and support provided to LEAs. In response, LEAs develop parallel cost-sharing arrangements outside SELPA structures and may be exposed to legal liabilities when SELPA supports are insufficient or misaligned with local needs.

What SELPAs Spend on Regional Operations — and How Much the State Funds

We analyze how SELPAs allocate funds to regionalized operations and compare these expenditures to state funding levels. Under current law, the state provides a dedicated Program Specialist and Regionalized Services (PS/RS) component within AB 602. This allocation, approximately $20 per ADA, is intended to support regional administration, program specialists, local plan development, and fiscal oversight (§56836.23). We use the PS/RS allocation as a benchmark because it is the only state funding stream specifically designated for regionalized operations and program specialist support. However, the regionalized operations budgets reported in Table 4, item D-10 are not necessarily limited to PS/RS-funded activities. The CDE template asks SELPAs to report total operating expenditures budgeted for the SELPA's exclusive use, excluding district LEA, charter LEA, and COE LEA expenditures. As a result, D-10 may include a broader and locally variable mix of SELPA administration, regionalized services, program specialist costs, pooled supports, indirect costs, and other centrally retained expenditures.

Across SELPAs in our sample, projected D-10 regionalized operations budgets substantially exceeded the amount provided through the PS/RS allocation, the state's only dedicated funding stream for regionalized operations and program specialist support. While the state provides approximately $20 per ADA through the PS/RS allocation, the median SELPA projected spending of $44 per ADA—more than twice the state-provided rate. In total, SELPAs in the sample projected spending $547 million beyond the state allocation toward regionalized operations, with roughly 80 percent of that directed toward salaries and benefits.

Countywide SELPAs projected spending more on regionalized operations, $77 per ADA, compared to just $37 per ADA in multi-SELPA counties. Several factors may contribute to this pattern, including the absence of alternative SELPAs within the county, the geographic scale of countywide coordination responsibilities, and the higher share of small or rural LEAs that rely on regional administrative support (Table 3).

The distribution of planned regionalized expenditures is also highly skewed across all SELPA types. Across the full sample, the minimum projected expenditure per ADA is $2 while the maximum is nearly $4,000 per ADA, reflecting a wide range in the fiscal scale of regionalized SELPA expenditures across regions.

The administrative portion (e.g., SELPA director salary, data reporting infrastructure) of these regionalized expenditures is financed not only through the designated PS/RS allocation, but also through additional pooled special education funds retained before base allocations are distributed to member LEAs. However, the detail provided in the regionalized operations budget is insufficient to determine how much of the projected budget reflect SELPA administration, program specialist support, pooled regional services, or other centrally retained activities. Therefore, the comparison to PS/RS should not be interpreted as evidence that SELPAs are spending beyond the PS/RS allocation on the same set of activities funded by PS/RS. Rather, the comparison shows that the total fiscal footprint of SELPA-level regionalized operations is much larger than the state's only dedicated allocation for regionalized operations and program specialist support. Although these data cannot show whether local agencies would otherwise bear these costs on their own, or whether those costs would be greater or smaller under alternative arrangements, they do show that SELPA regionalized operations represent a substantial and under-recognized component of special education spending.

Table 3: Minimum, Median, and Maximum Planned Regionalized Operations Expenditures per ADA by SELPA Type, 2024--25

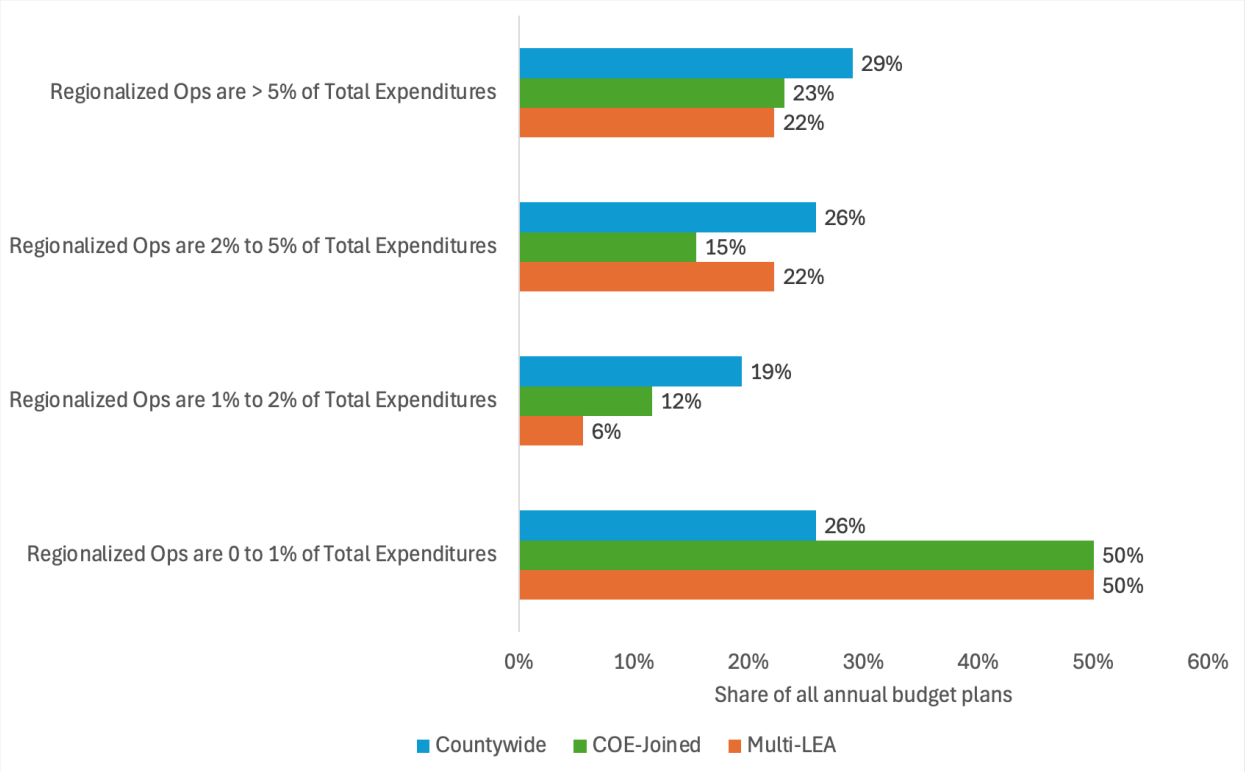
SELPA Type	Minimum	Median	Maximum
Multi-LEA	$11	$48	$3,952
Single-LEA			
All COE-Joined	**$2**	**$44**	**$3,889**
One of several in county	$2	$37	$3,889
Countywide SELPA	$14	$77	$3,774
Total	*$2*	*$44*	*$3,952*

Table 4 also presents variation in terms of the share of total planned expenditures directed toward regionalized operations. The median SELPA allocates roughly 2 percent of its total budget to regionalized functions, though this figure spans a wide range, from less than 1 percent of total SELPA expenditures to the entire budget in the most extreme cases. Countywide SELPAs again stand out, with a median share of 2.4 percent compared to 1.0 percent among COE-joined SELPAs in multi-SELPA counties and 1.3 percent among multi-LEA SELPAs. Countywide SELPAs are also more likely to allocate above 5 percent of total expenditures to regionalized operations (29 percent) compared to COE-joined SELPAs in multi-SELPA counties (23 percent) and multi-LEA SELPAs (22 percent). While these patterns highlight substantial differences in how SELPAs allocate resources, the expenditure data alone do not indicate whether these differences reflect variation in service provision, coordination activity, or organizational capacity.

Table 4: Minimum, Median, and Maximum Share of Planned Expenditures Directed Toward Regionalized Operations by SELPA Type, 2024--25

SELPA Type	Minimum	Median	Maximum
Multi-LEA	0.3%	1.3%	100%
Single-LEA			
All COE-Joined	**0.3%**	**1.9%**	**100%**
One of several in county	0.3%	1.0%	100%
Countywide SELPA	0.4%	2.4%	100%
Total	*0.3%*	*1.9%*	*100%*

Figure 4: Share of Budget Plans that Project Regionalized Operations Expenditures by SELPA Type



Most SELPAs dedicate a relatively small share of their budgets to regionalized operations. Half of both COE-joined and multi-LEA SELPAs spend less than 1 percent of total expenditures on these functions, though countywide SELPAs are somewhat more likely to allocate larger shares. One possible interpretation of this pattern is that countywide SELPAs face greater coordination demands because they function as the primary regional administrative node within their county. This structural role may increase both the scope and cost of regionalized operations relative to other SELPA structures. Countywide SELPAs also disproportionately serve small and rural LEAs with limited internal administrative capacity, which may increase member LEAs' reliance on the SELPA administrative unit for compliance oversight, data reporting, and technical assistance. More broadly, these expenditure patterns suggest that special education governance carries a substantial administrative burden, which LEAs may manage in part through shared SELPA infrastructure for compliance oversight, data reporting, technical assistance, and related coordination functions.

Interview data help contextualize these expenditure patterns. Administrators described SELPAs primarily as providing compliance support, data reporting, and information sharing across LEAs, while regional programs were often operated by LEAs or other providers. These accounts are consistent with the interpretation that a substantial share of regionalized expenditures supports coordination and compliance functions, although the available budget data do not allow coordination activities to be distinguished from service provision.

What LEAs Value Most: Administrative Support Over Direct Services

This section examines what LEA administrators identify as the primary value of SELPA participation. Across all nine interviews, administrators framed the value of SELPA participation primarily as a mechanism for managing the administrative burden of special education compliance rather than as a source of direct services. This pattern is consistent with the statutory design of SELPAs, which the California Education Code frames primarily as planning, assurance, and coordination structures rather than program operators (EC §§56205, 56206, 56208, 56211, 56213, 56241, 56243, 56244, 56245). That said, certain direct service functions — including Deaf and hard of hearing (DHH) and visually impaired (VI) services, as well as therapeutic and counseling-enriched programs for students with emotional disabilities — were repeatedly identified as areas requiring regional collaboration.

For analytic purposes, we organize SELPA functions into two categories. The first encompasses compliance and network coordination functions: administrative expertise and compliance support, third-party coordination and network management, and alternative dispute resolution. The second encompasses service provision and resource pooling functions: specialized programs, itinerant staffing arrangements, and fiscal mechanisms through which SELPAs help LEAs access services and manage costs.

Compliance and Network Coordination Functions

Administrative Expertise and Compliance Support

The most consistently valued function SELPAs performed was helping LEAs manage the administrative burden of special education compliance. Districts face substantial demands under the Individuals with Disabilities Education Act (IDEA), which requires extensive time and technical expertise to meet its compliance, documentation, and procedural requirements (Yell, 2019). The consequences of noncompliance — including corrective action and due process proceedings — create strong demand for reliable expert guidance (Yell, 2019). All but one administrator described this support as a central benefit of SELPA participation.

Leaders of small LEAs in particular identified the SELPA as their primary resource when navigating comprehensive improvement monitoring (CIM) plans, California Longitudinal Pupil Achievement Data System (CALPADS) reporting, the Special Education Information System (SEIS), other state reporting requirements, legal updates, and procedural questions.

> "All my small district monitoring by the state, all those reports that we have to do, make sure that we're meeting all of our California Longitudinal Pupil Achievement Data System (CALPADS) due dates, making sure we've affirmed all of our IEPs…I feel like SEIS and CALPADS are where most of our questions come from." – Rural Fringe District Two

For smaller districts — sometimes led by a single administrator — SELPAs function as a critical extension of local leadership capacity, supporting both routine administrative tasks and complex individual cases. In high-functioning SELPAs, this support was individualized and relational: administrators could reach a program specialist quickly and receive timely guidance.

> "Anytime anything comes up I can call them any time of day, and they will help guide me before making those decisions" – Rural Fringe District One.

Taken together, these accounts suggest that SELPA coordination capacity functions as a supplementary infrastructure that extends the reach and depth of LEA expertise. Read alongside the expenditure findings above, they also suggest that regionalized spending is at least partly financing shared compliance infrastructure that LEAs experience as essential to managing the administrative demands of special education.

The administrative burden arises from both federal and state policy. Federal requirements under IDEA, such as due process protections, individualized education programs, and extensive reporting obligations, create a baseline level of complexity that states cannot avoid. However, administrators also described substantial additional burden associated with state-specific systems and requirements, including CALPADS reporting, SEIS data systems, interpreting state guidance, and state monitoring processes. While these systems may support oversight and compliance, their cumulative administrative cost appears substantial and has not been systematically evaluated relative to their benefits. For many LEAs, the value of SELPA participation appears to lie precisely in helping absorb this burden.

Third-Party Coordination and Network Management

A second valued function was the SELPA's role as a network broker. Rather than directly employing specialists or operating programs, SELPAs leverage their position as the administrative hub of the regional network to connect member LEAs, identify shared solutions, and reduce the transaction costs of inter-LEA collaboration. However, administrators also described significant variation in how effectively SELPAs actually performed this brokering function.

Administrators also noted that SELPAs are only one of several organizations involved in coordinating educational policy at the regional level. Because the SELPA's mandate is specific to special education, its coordination work sometimes runs parallel to — rather than fully integrated with — the broader coordination roles performed by county offices of education, which typically convene LEA leaders, disseminate state guidance, and coordinate implementation across most other policy areas.

One administrator drew a useful distinction between the specific organization performing this function and the underlying governance need it serves:

> "It doesn't have to be SELPA. It just happens to be SELPA. The LEA couldn't function — especially around data and compliance — without that central body." — Small City LEA Three

The SELPA's specialized mandate creates a parallel coordination structure for special education that can produce both efficiencies and redundancies, depending on how well the two entities collaborate. Importantly, this suggests that administrators value the network coordination function itself — the existence of a designated administrative node capable of convening LEAs, managing information flows, and supporting compliance — more than they are attached to the particular institutional form through which it is currently delivered.

One participant raised a more foundational critique, questioning the modern relevance of the SELPA structure itself. In this view, SELPAs reflect an earlier governance context in which remote communities had fewer opportunities to communicate directly and regional entities played a necessary role in transmitting information from the state. From this perspective, core SELPA functions such as fund distribution and information sharing might now be carried out through county offices or even a state-level entity, provided those organizations had the expertise and relationships necessary to interpret and communicate guidance to LEAs effectively. At the same time, six of nine administrators described these interpretive and compliance roles as indispensable, suggesting that any such change would require a gradual, capacity-building transition.

Alternative Dispute Resolution

Administrators also described alternative dispute resolution (ADR) as part of this broader administrative infrastructure, particularly where early conflict resolution reduced the downstream burden of complaints, due process, and legal disputes. Under IDEA, LEAs must provide formal dispute resolution procedures when disagreements arise regarding the identification, evaluation, placement, or provision of services for students with disabilities, including mediation, due process hearings, and state complaint investigations (34 C.F.R. §§300.151--516). While federal law requires that states make

mediation available, it does not mandate the early or informal dispute resolution processes designed to prevent conflicts from escalating to formal proceedings.

The state provides SELPAs with modest dedicated funding—approximately $15,000 annually—to support ADR activities such as facilitated IEP meetings, neutral third-party facilitation between families and districts, early mediation prior to formal due process, and training for LEA staff on conflict prevention and collaborative problem solving. When ADR programs function well, administrators described them as an important mechanism for preventing costly formal disputes.

> "The SELPA really has been instrumental in the alternative dispute resolution process... the first consultation with any family usually is covered by the SELPA... and then if we go beyond that, we pay for it and we're happy to do that because we found it to be a valuable process." — Rural Fringe District One

Despite all SELPAs receiving the same ADR funding, administrators reported widely varying levels of service — including among SELPAs confirmed to have received the funds.

> "[SELPA ADR support] is just really, very minimal...[and] I don't have enough leadership to actually do some intentional reshaping based upon the trends to actually bolster site capacity to mend those relationships. [If I had ongoing ADR support] I would see an immediate reduction in CDE complaints and due process filings." — Large Suburban District Two

The state funds ADR precisely because early resolution is expected to reduce downstream costs; when SELPAs fail to implement this function effectively, those savings never materialize and the burden falls on districts. Whether LEAs could do anything about this variation depended largely on their ability to influence SELPA decision-making — a dynamic examined in the following section.

Service Provision and Resource Pooling Functions

Access to Scarce Specialists and Thin Labor Markets

Unlike administrative and compliance support, which administrators described as consistently valuable, service provision functions were experienced as more contingent and uneven across SELPAs. Deaf and hard of hearing (DHH) and vision-impaired (VI) services as well as therapeutic and counseling-enriched programs for students with emotional disabilities were repeatedly identified as the services that require regional collaboration. Even large districts tend not to have enough students in these areas of need to justify a full-time position.

Despite the clear need for regional coordination around these specialized services and programs, administrators described significant variation in whether SELPAs performed this function. When SELPA coordination was insufficient, LEAs actively constructed their own arrangements: forming inter-district consortia to operate shared classrooms, entering joint powers agreements (JPAs) and memoranda of understanding (MOUs) to share specialist positions, and building informal networks with neighboring superintendents.

Fiscal Coordination and Material Support

Administrators described SELPA regionalized budgets as providing certain forms of fiscal coordination and risk sharing — functions that are explicitly grounded in the statutory framework governing how SELPAs distribute and manage pooled special education funds. In some cases, SELPAs offered seed funding for new programs, pooled financial support for high-cost placements, low-incidence equipment purchasing, or countywide master contracts with specialized providers. These mechanisms represented a form of collective risk management: by pooling resources across member LEAs, SELPAs could buffer them against the unpredictable costs that special education placements and services can generate.

For small LEAs in particular, these fiscal protection mechanisms could be consequential. A single nonpublic school placement or unexpected need for intensive related services can destabilize the entire budget of a small LEA. One administrator described this vulnerability directly:

> "As a small school LEA, one student going into a non-public placement... my budget was done. We try and keep a little squirreled away, but for us smalls, [the risk] is a big deal." — Rural Fringe LEA Two

However, fiscal coordination was among the most unevenly experienced of all the functions administrators described. Some respondents reported that pooled fiscal protections existed only minimally, were difficult to access, or did not meaningfully reduce LEA burden. Others described meaningful fiscal support but raised concerns about how pooled funds were governed and distributed across LEAs of different sizes and fiscal capacities.

A perception among the larger LEAs in the sample, is one of fiscal inequity, where financial contributions to the SELPA are not seen as proportional to the support received. This sentiment fuels frustration with the funding model:

> "[SELPA] don't meet our needs as our LEA...We're a large contributor to the SELPA because we're the largest school LEA in the county. And I don't understand why we don't get the support that we need with the amount." — Small City LEA One

Governance structures, such as weighted voting that may not fully reflect size or contribution, can exacerbate these feelings. SELPA regional governance structures have varying voting structures with varying amounts of input from individual LEAs.

These tensions were visible in regions where the LEAs differed substantially in size and student population. One administrator described uncertainty about whether pooled resources were distributed equitably:

> "I do feel like there's some inequities around the ADA LEAs versus the basic aid. And I know in [another county], we were all ADA, but definitely the little LEAs compared to the big LEAs...we

all took care of each other and we evened out the playing field so that everybody got what they wanted. I'm not quite feeling the same here. I don't know that it is as equitable." — Small City LEA Two

These accounts illustrate a structural tension potentially inherent in mandatory network governance in education: when LEAs contribute resources to a shared regional system but cannot exit that system it may be difficult for LEAs to influence the regional priorities.

Why Some SELPAs Work Better Than Others: The Primacy of Leadership Over Structure

This section analyzes variation in SELPA performance and identifies factors associated with stronger coordination capacity. Across both functional categories, administrators described substantial variation in the extent to which SELPAs actually performed the governance functions LEA leaders valued. The quality, experience, and capacity of SELPA leadership and staff are frequently cited as primary determinants of an LEA's experience. This variation was not primarily a function of SELPA type or size — it appeared across COE-joined and multi-LEA SELPAs, in urban and rural counties, and among both large and small regional systems.

Instead, administrators consistently attributed differences in SELPA capacity to leadership, organizational culture, and the degree to which SELPA staff understood their role as proactive partners in LEA problem-solving rather than passive intermediaries between the state and member LEAs. When effective, SELPA leadership fostered collaborative networks and provided responsive support that extended district capacity through on-demand expertise and training for personnel. Conversely, poor or absent leadership resulted in isolation, adversarial relationships, and potentially increased compliance risks.

The most consistent marker of high coordination capacity was the accessibility and relational orientation of SELPA staff. Administrators in counties with strong SELPAs described being able to reach a program specialist or director quickly and receive individualized guidance — not merely information

forwarding, but genuine problem-solving engagement with the specific circumstances of their LEA. One administrator described what this looks like in practice:

> “Especially in a small organization, we don't have a huge [special education] department. We don't have a huge anything here. So just having that brainstorming... about some unique needs that we don't necessarily have an expertise for. They don't try to make decisions for us or push decisions on us, but they're frank about, well, have you thought about this? You might want to steer clear of this. And if you see this happening, let us know because sometimes we see that go that way." — Rural Distant LEA

This relational accessibility was understood as a signal of organizational culture: SELPA staff who engaged proactively with LEA problems were seen as performing the coordination role as intended. In contrast, administrators in counties with weaker SELPAs described a qualitatively different relationship — one characterized by information transmission rather than genuine partnership:

> "Maybe I'm misunderstanding their role because they are really the middleman between the state and us. So maybe they aren't the decision-making entity...but sometimes you need an answer, and you want it to be consistent." — Small City LEA Two

A second marker was responsiveness to LEA-specific needs — the degree to which SELPA staff adapted their support to the particular circumstances, size, and capacity of individual member LEAs rather than providing uniform services across the network. Administrators in high-capacity SELPAs described staff who understood their LEA's specific programs and student populations and could tailor guidance accordingly. In lower-capacity SELPAs, administrators described receiving standardized communications that did not account for LEA-specific circumstances or encountering staff who were unfamiliar with the details of their programs.

These patterns suggest that the governance functions SELPAs perform in practice depend less on their formal structure or resource level than on the organizational capacity and leadership orientation of the SELPA administrative unit. This perception is deeply personal, determined by the people in key roles and their commitment to partnership.

How LEAs Work Around the System When SELPAs Fall Short

The perceived effectiveness, role, and value of the SELPA structure vary dramatically between regions, from being a critical support system to being a minimal or dysfunctional administrative layer. This variability is shaped by governance, funding, leadership, and local history. This section examines how LEAs respond when SELPA capacity is insufficient or misaligned with local needs—addressing the research question of how LEAs construct alternative governance arrangements when regional coordination falls short.

Notably, six of the nine administrators we spoke with described highly positive relationships with their SELPA and reported that it was responsive to their input. Yet even among satisfied administrators, there were areas where alternative arrangements were necessary to meet student needs within their particular contexts. The variation in LEA administrator experiences was striking. Some participants described SELPAs that were consistently responsive and supportive:

> “Everything that we suggest is at least considered or brought up for discussion. There’s not really a time that I can’t text the [SELPA] director and say I have a question and she won’t schedule something or answer, even late at night or early in the morning” – Large Suburban District One

Others, however, described difficulty obtaining even basic information from their SELPA despite repeated requests:

> "I don't know what oversight the state has over SELPA governance structures and how it's allowed for [this SELPA] to have such a fundamentally different design and fundamentally different output than other SELPAs...We have to pay for a SELPA director and no one wants to do that because no one thinks it's functioning.” – Large Suburban District Two

Four distinct response strategies emerged across the interviews: horizontal collaboration across LEAs, direct contracting with private providers, building internal capacity, and exercising voice. These strategies were not mutually exclusive — administrators frequently described pursuing multiple

approaches simultaneously, selecting among them based on the nature of the gap, the resources available, and whether the SELPA offered a realistic path to improvement.

Horizontal Collaboration Across LEAs

All nine LEA administrators described constructing horizontal collaborative arrangements — consortiums, joint powers agreements (JPAs), memoranda of understanding (MOUs), and informal inter-LEA sharing for special education services. This was among the strongest and most consistent cross-case findings: administrators across SELPA types, county contexts, and LEA sizes described building or participating in collaborative arrangements outside the formal SELPA structure.

These arrangements emerged for several distinct reasons. In some cases, LEAs developed consortiums because regional placements operated through the SELPA required excessive transportation time for students. In others, small LEAs shared specialist positions through superintendent networks because the SELPA did not offer sufficient regional placements or could not broker arrangements quickly enough. In still others, LEAs formed JPAs specifically to increase their collective leverage within SELPA governance — a dynamic examined further in the voice subsection below.

One rural administrator described their alternative network as the first line of response to service gaps:

> "We've got our small LEA cohort... we network a lot... the first thing we do is call our neighboring districts and say, hey, do you have an SLP or counselor...a lot of our challenges can be addressed that way." — Rural Distant District

In some cases, these arrangements evolved into durable regional governance structures in their own right—effectively creating a supplementary service network alongside the SELPA rather than through it. One administrator described creating a regional classroom network specifically to reduce transportation burdens that made county-operated placements impractical:

"We were having to send students... and that was like a two-hour bus ride... so we developed a consortium... there are seven of us... and there are classrooms across the campuses." — Rural Fringe District Two

These accounts illustrate both the resourcefulness of LEA administrators in securing student access to services and the limitations of existing regional arrangements. The prevalence of such workarounds is perhaps unsurprising given that some counties are geographically large, making it difficult for a single SELPA administrative unit to serve all member districts conveniently. Two administrators noted that their SELPAs had responded to this challenge proactively, splitting into sub-regions to ensure more equitable access to services across the county.

Direct Contracting with Private Providers

When regional capacity was unavailable through either the SELPA or the collaborative arrangements described above, LEAs turned to the private market. Administrators described hiring speech and language contractors, engaging nonpublic agencies and schools, retaining independent legal counsel, purchasing professional development from private vendors, and managing out-of-state placements — all functions that a well-functioning regional governance system might otherwise coordinate or support.

Private market services were described as effective at addressing immediate gaps but typically more costly than regional alternatives. One administrator noted that private speech contractors cost approximately $150 per hour when regional capacity was unavailable. Others described the administrative burden of managing independent contracts and out-of-county placements without SELPA support.

These accounts illustrate a broader pattern: when regional coordination capacity falls short, the associated costs do not disappear — they are redistributed to member LEAs in the form of higher unit costs and greater administrative burden.

Building Internal Capacity

A third response involved building internal expertise and expanding LEA-operated programs — bringing students back from regional placements, establishing new local programs, and developing in-house legal and compliance knowledge that LEAs might otherwise rely on the SELPA to provide.

The trend of bringing students back from regional placements came up in eight of the nine interviews, despite there being no specific question on this topic. Participants attributed this shift to the high cost of county programs relative to developing an in-house program or purchasing classroom seats from a neighboring district that had done so.

Two of the nine administrators also expressed concerns about losing control over student programs for which they remained legally responsible. One described a situation in which the misalignment between service provider and legal obligation was particularly acute:

> "Who are [SELPA] accountable to? And what are their outcomes? When the rubber meets the road, SELPA has said, oh, it's the LEA [responsibility]. And now we have lawyers involved and [SELPA is] no longer involved and [SELPA is] not named in the lawsuit. But what [SELPA] decided are what the complaints are about... [and now] sitting in a mediation session...and the resolution is for me to allocate 45 hours for vision services, and I can't do that because I don't [employ] that person." — Small City LEA One.

Administrators from three SELPAs also described building internal expertise in legal and compliance matters when SELPA guidance was limited or inconsistent. They reported developing their own knowledge through professional networks, listservs, legal counsel, and accumulated experience — a process that gradually increased LEA capacity but demanded substantial time and leadership attention that administrators felt was diverted from instructional priorities.

Exercising Voice

The fourth response involved attempts to reform the SELPA from within. However, the effectiveness of this strategy varied considerably based on governance structures and LEA influence within the SELPA decision-making process.

These challenges arise in part from the voting and representation rules each SELPA adopts for its governing board. Although SELPA governing boards are composed of member LEA superintendents or their designees, each SELPA establishes its own rules for representation and voting allocation. Administrators described governance arrangements that did not always reflect LEA size or financial contribution—in some cases because smaller LEAs had organized collectively to increase their voting power. LEA administrators in these circumstances had little recourse, as they cannot exit their SELPA under current California law.

Discussion

This study examined how California's mandatory regional special education governance structure—the SELPA—functions in practice. The findings are more complex than either critics or defenders of SELPAs often acknowledge. SELPAs are not, in most cases, centralized service providers that efficiently pool resources across LEAs. Nor are they simply bureaucratic layers that LEAs would be better off without. Rather, they function primarily as shared administrative infrastructure for managing a genuinely burdensome compliance environment—one that many LEAs, especially smaller and more geographically isolated ones, may not be able to navigate on their own.

Three findings have especially important implications for state policy. First, the administrative burden of special education appears to exceed what the state explicitly funds SELPAs to address, and some state policy choices may add to that burden. Second, SELPAs receive dedicated state funding for alternative dispute resolution (ADR), yet implementation varies widely and the state has limited visibility into which SELPAs are delivering meaningful ADR support. Third, although SELPAs are intended to help ensure LEAs have access to a full continuum of special education services, service provision is uneven in practice, and many LEAs have developed parallel inter-LEA and private arrangements to fill

the gaps. Together, these findings suggest a need to revisit how the state approaches SELPA funding, oversight, and accountability.

The Administrative Burden Is Substantial, and the State Could do More to Understand and Reduce It

The most consistent finding across the financial and interview data is that special education governance imposes a substantial administrative burden on LEAs and that SELPA-level regionalized operations appear to require resources well beyond the amount the state explicitly designates for regionalized operations and program specialist support. In our sample, the median SELPA projected spending about $44 per ADA on regionalized operations budgets—more than twice the roughly $20 per ADA provided through the state's dedicated PS/RS allocation. Across the full sample, SELPAs projected roughly $647 million annually in regionalized operations, compared with approximately $100 million in dedicated state PS/RS funding. Because regionalized budgets capture total expenditures budgeted for the SELPA's exclusive use, this comparison should be understood as a benchmark against the state's dedicated regionalized-operations funding stream, not as evidence that all D-10 expenditures are PS/RS-funded activities or purely administrative costs. In practice, this gap appears to be financed by retaining additional special education funds before distributing base allocations to member LEAs.

This pattern is not uniform across SELPA types. Projected regionalized spending ranges from very low levels in some SELPAs to nearly $4,000 per ADA in others. Countywide SELPAs—those functioning as the primary regional administrative node within their county—project substantially higher regionalized expenditures than SELPAs in counties with multiple regional providers. One plausible explanation is that countywide SELPAs often serve a higher concentration of small and rural LEAs and may have fewer alternative entities available to absorb coordination functions. If so, the gap between the state's dedicated regionalized-operations allocation and actual regionalized expenditures may be greatest precisely where LEAs have the least internal capacity to absorb these responsibilities independently.

Interview data suggest that LEAs generally view this shared administrative infrastructure as valuable. Eight of nine interviewed administrators identified compliance support, regulatory interpretation, and information brokering as the primary reason SELPA participation was useful—more consistently than they identified any specific service the SELPA provided. This pattern appeared across multiple SELPA contexts and was especially pronounced among smaller and more geographically isolated LEAs, where a single administrator may simultaneously oversee compliance, staffing, program development, and dispute resolution. For these administrators, the SELPA often functions as an extension of local leadership capacity.

At the same time, the administrative burden LEAs described arises from more than one source. Some of it is unavoidable. Federal requirements under IDEA establish a baseline level of legal and procedural complexity that California cannot eliminate. But administrators also pointed to the cumulative burden associated with California-specific systems and processes, including comprehensive improvement monitoring, CALPADS reporting, and SEIS. These requirements may serve legitimate oversight purposes, but their costs have not been systematically evaluated relative to their benefits.

California's requirement that all LEAs participate in a SELPA and that each SELPA maintain a local plan also goes beyond what federal law requires for IDEA eligibility. As prior reviews have noted, SELPA local plans do not appear to function as meaningful improvement tools, and the state has limited processes for monitoring their quality or implementation (Doutre et al., 2021b). This raises a broader policy question: whether California has layered additional governance and reporting requirements onto an already demanding federal framework without sufficient attention to the administrative costs those requirements generate.

Alternative Dispute Resolution is a Funded Function with Inconsistent Implementation

ADR provides a particularly clear example of a function the state has chosen to support through SELPAs but does not systematically monitor in practice. SELPAs receive dedicated state funding—approximately $15,000 annually—to support ADR activities such as facilitated IEP meetings,

early mediation, and staff training intended to prevent disputes from escalating into formal complaints or due process hearings. The logic is straightforward: early conflict resolution can reduce legal expenditures, staff time, and family-district conflict while improving relationships and preserving capacity for instruction and service delivery.

California has chosen to deliver this support through SELPAs rather than centralize it or assign it to a dedicated statewide assistance structure. The problem is not that ADR lacks a policy rationale; it is that implementation varies substantially across SELPAs, and the state currently has limited visibility into that variation. Nearly all SELPAs applied for ADR funding in 2025–26, but interviewed administrators described markedly different levels of service. In some regions, administrators reported robust ADR supports, including facilitated meetings, early consultation, and conflict-prevention training. In others, they described ADR programs that existed only minimally in practice.

ADR illustrates a recurring feature of the current governance structure: the state identifies a function it considers valuable, allocates funds to support it, and then leaves implementation largely to locally governed regional entities without consistent performance expectations or systematic reporting on what is actually delivered. When ADR is weak or absent, the costs do not disappear; they are shifted to LEAs in the form of legal fees, staff time, and more formal proceedings. Those costs are difficult to trace in budget documents, but administrators described them as real and consequential.

More broadly, ADR is instructive because it mirrors the wider visibility problem identified elsewhere in this study. The coordination functions LEAs value most—compliance guidance, information brokering, responsiveness to local need, and dispute prevention—are central to the practical value of regional governance, yet they are only weakly captured by current state reporting systems. The state therefore has limited ability to distinguish between SELPAs that are performing these functions well and those that are not.

Services Provision is Uneven, and LEAs Have Built Parallel Arrangements to Fill the Gaps

California's SELPA model was designed in part to ensure that every LEA has access to the full continuum of special education services required under IDEA, including services that many districts—especially smaller ones—could not efficiently sustain on their own. In principle, regional governance allows LEAs to pool resources to support specialized programs, itinerant staff, and low-incidence expertise that would otherwise be difficult to provide.

In practice, however, service access appears more uneven than this design implies. Interview participants consistently identified a small set of services as both highly valuable and genuinely difficult for individual LEAs to provide independently, especially services for students who are deaf or hard of hearing, services for students with visual impairments, and certain therapeutic or counseling-enriched programs. Administrators also valued SELPA assistance in brokering access to scarce specialists more generally, even when SELPAs did not directly employ those specialists themselves. Beyond these areas, however, participants described considerable variation in what SELPAs actually provided.

In response, many LEAs appear to have developed a parallel system of service coordination outside formal SELPA structures, including inter-LEA consortia, joint powers agreements, memoranda of understanding, and direct contracts with private providers. This was one of the most consistent findings across interviews. These arrangements are not necessarily evidence of dysfunction; in some cases they reflect pragmatic and potentially innovative responses to local service needs. But they do suggest that the mandatory SELPA structure does not, by itself, reliably guarantee access to needed services in all contexts.

This pattern also raises an accountability concern. Under IDEA and California law, LEAs retain ultimate legal responsibility for ensuring students receive a free appropriate public education, even when services are coordinated or provided through regional structures they do not directly control. Administrators described situations in which service failures or conflicts involving SELPA-managed arrangements ultimately became LEA legal liabilities. This creates a structural tension: operational control may be shared or regionalized, but legal accountability remains local.

Notably, the variation participants described in SELPA service quality did not appear to track neatly with SELPA type, size, or funding level. Instead, administrators consistently attributed stronger and weaker SELPA performance to leadership orientation, organizational capacity, and relational trust—particularly whether SELPA staff approached their role as proactive partners in LEA problem-solving or as passive intermediaries transmitting state guidance. This suggests that funding changes alone are unlikely to resolve the problem if the underlying issue is organizational capacity and the quality of regional relationships.

Policy Implications

This study is descriptive rather than causal. The qualitative sample is small and weighted toward smaller and more rural LEAs, so the findings most directly reflect the experience of LEAs with limited internal capacity—those for whom SELPA coordination may be especially valuable and SELPA failures especially costly. Administrators in larger or better-resourced LEAs may experience these governance functions differently, and future research should examine that variation more systematically.

With those limitations in mind, the findings raise six policy questions for California and may also inform other states considering regional approaches to special education governance.

Does the state's funding for regionalized operations reflect what SELPAs are actually expected to do?

The state provides dedicated funding for Program Specialist and Regionalized Services (PS/RS), yet total SELPA-level expenditures on regionalized operations substantially exceed that allocation. This suggests that SELPAs finance regionalized functions not only through PS/RS funds, but also through additional special education funds retained before base allocations are distributed to member LEAs. Because regionalized operations budgets may include administration, program specialist support, pooled regional services, indirect costs, and other centrally retained expenditures, the gap should not be interpreted as a one-to-one measure of underfunded PS/RS activities. Still, policymakers could examine whether the current PS/RS allocation reflects the actual cost of the regionalized functions

SELPAs are expected to perform, including compliance support, data reporting, ADR, and coordination of specialized programs. They could also examine whether the current financing arrangement—under which governing boards retain additional pooled funds through locally determined processes—is sufficiently transparent and equitable across member LEAs.

Does the state have enough visibility into how SELPA funds are used and what LEAs receive in return?

A central finding of this study is that the state lacks sufficient visibility into how SELPA regionalized expenditures are used in practice. Although SELPAs submit annual budget documents through a standardized CDE template, those documents do not consistently distinguish administrative expenditures from shared service provision, nor do they consistently identify the extent and nature of the services LEAs receive across regions. Some SELPAs provide narrative descriptions of broad functions or activities, while others focus primarily on allocation formulas and distribution mechanics. As a result, the state can observe that substantial regionalized expenditures exist, but not what those expenditures reliably purchase. Clearer reporting expectations around the purposes of retained funds, the functions supported by regionalized budgets, and the services available to member LEAs would improve comparability and provide the state with a clearer picture of what regional governance is actually delivering.

Is the state adequately monitoring whether SELPAs perform the functions they are funded to support?

The findings suggest that California funds certain regionalized functions—including ADR, compliance support, information brokering, and service coordination—without consistently monitoring whether those functions are implemented in meaningful ways. ADR provides the clearest example. Nearly all SELPAs receive ADR funding, yet interviewed administrators described wide variation in whether early dispute resolution and conflict-prevention supports were robust, minimal, or largely absent in practice. More broadly, the same visibility problem applies to the coordination functions LEAs most consistently value, including guidance on compliance, reporting systems, procedural questions,

and access to specialized administrative expertise. Policymakers could consider whether funded regionalized functions should be treated less as discretionary local activities and more as supported obligations with clearer expectations for availability, responsiveness, and implementation..

Are state-specific governance and reporting requirements generating administrative costs that exceed their oversight benefits?

The administrative demands described by LEA administrators stem from both federal and state policy. IDEA creates a baseline level of legal and procedural complexity that states cannot avoid. But California-specific requirements—including local plan maintenance, CALPADS reporting, SEIS, and state monitoring processes—add to that burden. Prior reviews have found that the SELPA local plan does not function as a meaningful improvement tool and is not systematically monitored for quality or implementation (Doutre et al., 2021b). This raises the question of whether some state-specific governance and reporting requirements generate administrative costs that exceed their oversight value, particularly for smaller LEAs that rely heavily on SELPA support to manage them. Policymakers could assess whether these requirements have been systematically weighed against their implementation costs and whether simplification is possible without weakening accountability.

Should LEAs have more flexibility to affiliate with higher-performing SELPAs for administrative functions?

The findings suggest that many of the functions LEAs value most—such as compliance guidance, data reporting support, legal updates, and procedural interpretation—do not depend heavily on geographic proximity and can often be delivered remotely. Yet LEAs are generally bound to geographically defined SELPA structures and have limited ability to exit poorly performing arrangements. This question is especially salient in light of the state's recent moratorium on the creation of new SELPAs, which has further constrained opportunities for local reorganization. Charter school LEAs already have some flexibility to join charter-only SELPAs that draw members from across the state, suggesting a precedent for non-geographic affiliation. Policymakers could consider whether some additional flexibility—particularly for administrative and compliance functions, where distance

may matter less than quality and responsiveness—would strengthen incentives for improvement without undermining local service coordination where geography remains important

Does the current structure adequately protect LEAs when regional supports are weak or misaligned with local need?

Interview data suggest that when SELPA supports are insufficient, uneven, or poorly aligned with local needs, LEAs often respond by building parallel arrangements outside formal SELPA structures. These include inter-LEA consortia, joint powers agreements, memoranda of understanding, and contracts with private providers. In some cases, such arrangements reflect adaptive and productive local problem-solving. But they also indicate that the mandatory SELPA structure does not always provide the level or type of service coordination LEAs need. At the same time, LEAs remain legally responsible for ensuring students receive a free appropriate public education, even when relevant services are shaped by SELPA decisions about pooled funds, program design, or provider arrangements. Policymakers could therefore examine whether the current governance structure provides sufficient clarity about how accountability is shared between SELPAs and member LEAs, and whether LEAs have adequate protections and information when regional decisions expose them to legal or fiscal risk.

Taken together, these findings suggest that California's special education governance system would benefit from greater clarity about what SELPAs are expected to do, how those functions are financed, how consistently they are carried out, and what LEAs receive in return. The evidence here does not suggest that regional governance is unnecessary. Rather, it suggests that the state currently requires and funds regional governance without sufficient visibility into how it operates across contexts or whether it is performing consistently enough to justify its costs. For California, this points to opportunities to strengthen transparency, consistency, and accountability within the existing structure. For other states considering more regionalized approaches to special education, the findings underscore the importance of pairing regional governance with clear expectations, adequate funding, and mechanisms for monitoring what regional entities actually deliver.

Conclusion

California's SELPA system occupies a central but poorly understood place in the governance of special education. Using financial data and interviews with LEA administrators, this study shows that SELPAs support a range of regionalized functions—including compliance support, data reporting, alternative dispute resolution, and coordination of specialized services—but that total SELPA-level expenditures substantially exceed the state funding explicitly allocated for regionalized operations. At the same time, existing budget documents do not allow the state to determine how much is spent on administration versus shared service provision, nor do they consistently show what services LEAs receive across regions.

Interview findings further show that LEAs experience SELPAs unevenly. Administrators most consistently valued SELPAs for administrative guidance, compliance support, and information brokering, particularly in smaller and more rural LEAs with limited internal capacity. By contrast, service coordination, fiscal risk-sharing, and access to specialized programs were more variable across regions. When SELPA supports were limited or misaligned with local needs, LEAs often built parallel arrangements outside formal SELPA structures, including inter-LEA agreements, shared staffing arrangements, and private contracts. In some cases, this mismatch also exposed LEAs to legal risk when they remained formally accountable for services shaped by regional decisions they did not fully control.

Taken together, these findings suggest that California's special education governance system depends heavily on regional intermediaries while maintaining limited visibility into how they operate, what they cost, and how consistently they perform. The evidence here does not suggest that regional governance is unnecessary. Rather, it suggests that mandatory regional governance requires clearer expectations, better information, and greater attention to the relationship between funding, function, and accountability. For California, this points to opportunities to strengthen transparency and consistency within the SELPA system. For other states considering more regionalized approaches to special education, it underscores a broader lesson: regional governance can help agencies manage specialized expertise and administrative burden, but its benefits depend on how clearly regional

entities' roles are defined, how adequately they are funded, and how well their performance is understood.

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Appendix

Interview Protocol

Opening (5 minutes)

- Tell me about your role at [Redwood city]
  - How long have you been in this role/LEA?
  - How do you interact with the [insert name] SELPA in your role? San Mateo county
    - Are you a member of the SELPA governing board?
  - I have some detailed questions about SELPA services, but before we get into that, I want to give you an opportunity to share broadly about your experience with your SELPA. Is there anything you want to say up front?

SELPA-Provided Regionalized Supports (RQ1)

- What are the main SELPA-provided services or supports your LEA relies on most?
  - Regional programs or classroom (e.g., deaf/hard of hearing; autism or behavior support)
  - Itinerant specialists (e.g., assistive technology); speech, OT, PT, school psych, BCBA, nurses
  - Programs for medically fragile students…
  - Paraprofessionals?

- Does the SELPA play a role when a student needs a nonpublic school placement?
  - NPS contracting/cost negotiations?

- When the LEA faces a due process issue, what support—if any—comes from the SELPA?
  - Due process support?
  - Legal consultation?
  - How does having SELPA support affect how you handle these situations?

- What kinds of professional learning does the SELPA provide?
  - Professional development for special education staff or admin?
  - Coaching or on-site TA?
  - Who typically participates?

- What fiscal or administrative work does the SELPA handle on behalf of your LEA?
  - Grant admin?
  - High-cost or risk pools?
  - Purchasing?

- How accessible are SELPA services when you need them?
  - waitlists, geographic barriers, eligibility processes..?

- How would you characterize the quality of these services?
    - expertise, consistency, outcomes…?

- Are there student needs or service areas where the SELPA is less helpful than you would hope?
    - What happens when the SELPA cannot meet a need? Can you give an example?

- Has your LEA's reliance on or satisfaction with SELPA services changed over time? What's driven those changes?

- How much influence does your LEA have over SELPA priorities and resource allocation?

- You've described [summarize]. Now I'd like to focus specifically on students with low-incidence disabilities or high-cost educational programs. Can you walk me through what happens when a student with [rare condition/intensive needs] enrolls in your LEA?

- Thinking specifically about students with low-incidence or high-cost needs, which SELPA-provided supports are most important for your LEA?

- If the SELPA did not provide [insert] service(s), what would your LEA have to do instead?
    - Would that be feasible? What would be the trade-offs

- Do you have visibility into what you're contributing to the SELPA versus what you're receiving back in services?

Section B: Coordination Outside Formal SELPA Structures (RQ2)

- Do you contract or coordinate for special education services or supports with other LEAs, SELPAs, or counties - outside of the [insert name] SELPA?
    - Are these formal MOUs/contracts or informal arrangements?
    - What do those arrangements look like in practice?
    - Why did these arrangements develop?

- Have you ever chosen NOT to use a SELPA service in favor of another option?
    - Can you provide an example?
    - What drove that decision?

- How do these arrangements compare to SELPA-provided supports? I'm thinking about things like:
    - Cost
    - Quality and expertise
    - Flexibility and responsiveness
    - Administrative ease
    - Reliability

    - Are there trade-offs?

- When deciding whether to rely on the SELPA or pursue another option, what factors matter most?
    - Who ultimately makes that decision?

- When you've identified a gap in SELPA services, what happens? Can you give me an example?

Closing

- Some people say that regionalized services work better for certain types of LEAs. What's your perspective on that based on your experience?

- Thinking about everything we've discussed, what does the SELPA do that would be difficult or impossible for your LEA to do on its own?

- California requires LEAs to be part of a SELPA. From your perspective, what works well about this regional structure? What doesn't?

- In what areas would you like more local control or flexibility? What would that enable you to do?

- Is there anything about SELPA supports, resource coordination, or serving students with intensive needs that we haven't discussed that you think is important?