Perspectives from the Front-line: Street-level Bureaucrats, Administrative Burden and Access to Oklahoma's Promise

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Abstract

An emerging theme in public administration scholarship is the impact of administrative burden—or onerous experiences of government—on access to public programs and the efficacy of democratic governance more broadly. In this article, we connect the growing literature on administrative burden with street-level bureaucracy literature, highlighting the ways in which role perceptions shape street-level discretion and program access in policy environments of administrative burden. Drawing on a state-wide survey and unique administrative data on the Oklahoma's Promise program, we find that street-level bureaucrats' role perceptions interact in ways that predict both the use of discretion and a key client outcome—program access. Our findings also highlight how restricted administrative capacity moderates the relationship between role perception and program access in environments of administrative burden. We conclude by discussing the theoretical and policy implications of these findings for future research at the intersection of street-level bureaucracy and administrative burden.

Key words: administrative burden; street-level bureaucracy; education policy; social equity

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In the pursuit of improving public governance, emerging public administration scholarship has called attention to the deleterious impacts of administrative burden in client-state interactions (Moynihan, Herd, & Harvey, 2015). These studies have demonstrated that administrative burden negatively affects program access and client well-being, with disadvantaged clientele facing the most challenges in confronting and overcoming costly encounters with government (Heinrich 2016; Heinrich and Brill 2015; Herd et al. 2013; Moynihan and Herd 2010; Moynihan, Herd, and Harvey 2015; Nisar 2017; Jilke et al. 2018). This body of literature has created rich avenues for future research, including the need to further explore the complex relationship between administrative burden, street-level bureaucrats (SLBs), and program access in local agencies.

In this article, we draw connections across administrative burden and street-level bureaucracy literature to formulate a series of theoretical hypotheses regarding the influence of SLBs' role perceptions in shaping the use of discretionary power and client access to the Oklahoma's Promise program—a state means-tested financial aid program that requires students to overcome significant compliance, psychological, and learning costs in the application process. We formulate a set of theoretical hypotheses predicting that SLBs' role perceptions and task environments meaningfully shape client experiences of administrative burden and access to the Oklahoma's Promise program. To test these hypotheses, we utilize unique statewide survey data, administrative data, and in-depth qualitative interviews with SLBs in charge of implementing the Oklahoma's Promise program.

Our analysis reveals support for the key theoretical hypotheses—SLB's role perceptions shape the use of discretionary power and program access in a policy environment of administrative burden. First, we find that SLBs taking on a "student support official" role use

discretion to go above and beyond to help clients navigate complicated systems of administrative burden in the application process. Second, we find that the interactions between role perceptions predicts levels of program access—we find that SLBs taking on only the "compliance officer" role, in which SLBs are primarily concerned with making sure clients meet stringent eligibility requirements, are significantly negatively associated with program access. On the other hand, SLBs taking on both the support and compliance role are positively associated with program access, suggesting that the dual focus on support and compliance may be more likely to alleviate costly interactions with government in environments of administrative burden. Finally, the findings reveal that working in a highly impoverished school with restricted administrative capacity moderates the relationship between SLB role perception and program access—while administrative capacity constraints overrode the effects of individual SLBs in highly impoverished schools, SLBs in less impoverished schools were more likely to significantly influence program access. Together, these findings take a step toward better understanding how role perceptions impact street-level discretion and client experiences of programs affected by administrative burden.

This study builds on existing literature by making two main theoretical contributions. First, we connect two previously disconnected literatures to shed light on one of the areas that Moynihan et al. (2015) highlight for future research on administrative burden—the relationship between front-line administrators and burden. Indeed, while many previous administrative burden studies have focused at the state level, our focus on the local level allows us to draw on theoretical insight from street-level bureaucracy studies to highlight how front-line administrators moderate the relationship between administrative burden policies and program access. Specifically, we emphasize the importance of variation across SLBs in the

operationalization of their role in implementation for the use of discretionary power and the resulting client outcomes. Second, we build upon street-level bureaucracy literature by investigating the interactions between role perceptions and how these interactions affect a key client outcome—program access. While previous studies have identified the variation in roles and the ways in which role perception shapes the use of discretionary toolkits (Watkins-Hayes 2011; Watkins-Hayes 2009; Sowa and Selden 2003), this literature has yet to investigate the interaction of role perceptions and the importance of these interactions for program access.

In the following section, we leverage the existing literature on administrative burden and street-level bureaucracy to provide theoretical grounding for the set of hypotheses to be tested. Next, we provide a detailed description of the system of administrative burden in the Oklahoma's Promise scholarship program. Then, we present our research design, data, and analytical approach. Finally, we conclude with a discussion of the implications of our findings for future research.

Previous Literature

We connect two literatures in public administration—administrative burden and street-level bureaucracy—to provide the theoretical grounding for our investigation. It is our contention that a deeper understanding of the ways in which administrative burden impacts democratic outcomes at the front-lines of government requires acknowledging the influence of SLBs and the context of the local agencies. Combining the insights of these literatures, this study is poised to contribute to theoretical advancement within the study of administrative burden that is grounded in the foundational work on street-level bureaucracy.

Administrative Burden and the Efficacy of Democratic Governance

Fundamental to the study of public administration are the complex interactions between clients and bureaucrats. These interactions are shaped in large part by the rules and constraints placed on bureaucrats by elected officials, which may serve to undermine organizational effectiveness and limit access to programs that clients desire from government. These interactions are the subject of the emerging literature on administrative burden, also known as bureaucratic disentitlement, which describes the experience of client-state interactions as onerous (Brodkin & Majmundar, 2010; Moynihan et al., 2015). In this way, the literature delves into a different transactional category than the traditional red tape literature (Kahn, Katz, and Gutek 1976), which highlights the role of burdens in the form of rules, constraints, and impediments to the internal functioning of organizational activities (Bozeman, Scott, and Reed 1992; Feeney and Rainey 2010). In opposition to the red tape literature, administrative burden literature focuses on the impact of burdens on the extra-organizational interactions between bureaucrats and clients seeking access to public services.

Administrative burden literature has highlighted the use of burden as a political tool with which policymakers and service providers can manipulate the compliance, psychological, and learning barriers that impede client access to public programs. To ration limited resources and exert social control, officials embed programs with barriers or administrative burdens that function to restrict client access to program benefits (Brodkin, 1997; Heinrich, 2016; Lipsky, 1984; Soss, Fording, & Schram, 2011). These burdens are made up of three types of costs: first, there are learning costs, or the challenges clients face in their efforts to learn about and understand fluctuating eligibility requirements that determine whether they will gain access to the program; second, there are compliance costs which refer to the documentation demands in the applications required to access public programs; third, there are psychological costs,

including stigma, stress, and a loss of agency for clients attempting to access public programs (Moynihan et al. 2015). Together, these three components of administrative burden are wielded as strategic policy tools by public officials engaging in hidden politics to enact significant policy changes to programs without participation in the traditional democratic processes of political consideration, debate, and public transparency (Moynihan, Herd, & Ribgy, 2016; Herd and Moynihan 2018). This is a particularly effective political tool because elected officials can avoid making high-profile, controversial decisions that may threaten their chances of re-election, such as funding cuts or program elimination, and instead utilize administrative burden to restrict access to programs not aligned with their political priorities (Lipsky 1984; Moynihan et al. 2015). Therefore, administrative burden is a powerful policy tool with which officials can manipulate democratic outcomes through the enactment of policy changes that induce learning, compliance, and psychological costs in client-state interactions.

The enactment and implementation of administrative burden has consequences for a variety of democratic outcomes, including: 1) civic engagement and efficacy (Bruch, Ferree, and Soss 2010; Soss 1999), 2) access to public programs and policy effectiveness (Heinrich & Brill, 2015; Herd et al., 2013), and 3) social equity (Jilke, van Dooren, and Rys 2018; Nisar 2017). First, administrative burdens can influence whether clients view government as a source of empowerment or disempowerment. In turn, administrative burdens shape perceived political efficacy (Soss 1999), as well as the likelihood that clients will take the essential step in any healthy democracy to engage in political and civic actions (Bruch, Ferree, and Soss 2010). In fact, administrative burden may shape not only the perceived efficacy of political action but also the perceived fairness and effectiveness of government as a whole (Heinrich, 2018).

In addition, administrative burden also has deleterious impacts on access to public programs and the effectiveness of policies aimed at alleviating suffering and improving client well-being (Cherlin, Bogen, Quane, & Burton, 2002; Heinrich, 2018; Heinrich, 2016; Herd et al., 2013; Shore-Sheppard, 2008; Wallace, 2002). For instance, enhanced levels of administrative burden have been linked to limited participation in social programs such as workforce training, Medicaid, and Temporary Assistance for Needy Families (TANF) (Cherlin et al. 2002; Shore-Sheppard 2008; Wallace 2002). Increased administrative burden and restricted access to public programs has serious consequences for those that rely on public assistance programs for their livelihood. For example, in the context of the South African cash transfer program, the loss of benefits due to additional programmatic burdens resulted in children engaging in higher levels of risky behavior and experiencing lower levels of educational attainment (Heinrich, 2016). On the other hand, in the context of Medicaid, scholars have revealed that when burdens are reduced, program enrollment increases (Herd et al. 2013). Together, these studies suggest that administrative burden is an important determinant of client access to programs and, in turn, client outcomes.

Perhaps the most problematic findings in this literature are those suggesting that administrative burden exacerbates inequality by disproportionately impacting the most disadvantaged populations, who have fewer financial, social, and cultural resources with which to navigate and overcome administrative burdens (Cherlin et al., 2002; Nisar, 2017; Nisar, 2018). Recent evidence suggests that private elderly care service providers discriminate against minority applicants by withholding information on the application process, which induces uneven learning costs across clients (Jilke, van Dooren, and Rys 2018). Moreover, research has revealed that higher levels of administrative burden in the eligibility requirements and enrollment

process of the TANF program were associated with particularly pronounced declines in participation among the most disadvantaged populations (Brodkin and Majmundar 2010). Given such findings, administrative burden may counteract the democratizing and equalizing force of public assistance programs, and instead perpetuate the system of inequality that these programs intend to alleviate. However, at the same time, there are entities, such as nonprofit organizations, that can reduce the administrative burden placed on marginalized groups by providing a source of additional client-state interactions in which the cognitive, temporal and economic costs of accessing government programs can be significantly reduced (Nisar, 2018). In particular, some nonprofits have "made it their business to ameliorate the administrative burden on the victim by slicing through the red tape" as a way to fulfill their organizational mission (Wiley and Berry 2018). This study takes a different approach, investigating whether such counteracting sources of assistance can also come from an essential actor in the program implementation process—the street-level bureaucrat (SLB).

While administrative burden studies have substantially advanced scholarly understanding of the impact of burdens on a whole host of democratic outcomes, the variation across local agencies in the implementation of burdens has been understudied, with some notable exceptions (see Watkins-Hayes 2009; Soss et al. 2011; Heinrich 2018). This is especially surprising considering that the manipulation of administrative burdens was perhaps first captured by Lipsky's (1984) seminal examination of street-level bureaucracy. In this work, Lipsky (1984) revealed that instead of making high-profile controversial decisions to cut programs that may impact the likelihood of re-election, policymakers often push decisions regarding resource distribution down onto front-line workers who interact daily with clients. This devolution of authority to the front-line creates the potential for administrative practices to vary

geographically, which introduces the possibility for street-level discretion to serve as a force for disentitlement and rationed access to limited public resources (Brodkin 2008; Lipsky 2010; Scott 1997; Soss, Fording, and Schram 2011). Therefore, especially for programs with decentralized implementation structures, it is an essential next step for scholars interested in administrative burden to investigate how variation in the strategic uses of discretionary authority by SLBs shape client resilience to administrative burden and variation in program access.

Street-level Bureaucrats and the Strategic Use of Discretion

As the front-line of government, SLBs wield the discretionary authority to shape whether clients gain access to programs and whether policy goals are translated into policy outcomes (Keiser, 1999; Kelly, 1994; Lipsky, 2010; Scott, 1997; Weissert, 1994). Accordingly, SLBs serve as "empowered citizen agents, who in their decisions to ration resources, provide access to programs, and sanction individuals" and in doing so "both communicate and convey social status"(Maynard-Moody & Musheno, 2000, p. 355). This use of discretion is essential due to the variability of individual client cases, which may be overlooked by the system of often-ambiguous laws. In these cases, SLBs make discretionary decisions based on value judgments for individual clients or "governed publics" in navigating the inevitable tension between the demands of policy and the unique needs of individuals in nonroutine cases (Maynard-Moody & Musheno, 2003, 2012). In this way, street-level agents can be thought of as informal policymakers whose normative choices regarding "which rules, procedures, and policies are acted on; who gets what services and who is hassled or arrested" substantially impact the experiences of government programs (Maynard-Moody & Musheno, 2003, p. 155; Epp et al. 2014). In other words, in both formal and informal roles, SLBs utilize discretion in ways that shape the ability of clients to access public programs.

In the exercise of discretionary authority, SLBs are significantly influenced by four main factors identified in previous literature: 1) communication by political or administrative superiors on the prioritization of policy goals, 2) organizational implementation factors, 3) knowledge and attitudes of SLBs about tasks, work, and clients, and 4) contextual factors such as workload, clientele and external pressure from political and social environments (May and Winter 2009). First and foremost, previous literature has revealed that one of the most influential factors is the individual values, knowledge, and beliefs of SLBs about policy, clients and the work environment (Lipsky, 2010; Maynard-Moody & Musheno, 2003; Sandfort, 2000; Watkins-Hayes 2009; Soss et al. 2011). Previous studies have found that even if policymakers and high level administrators attempt to change the priorities of street-level operations, SLBs are often still motivated primarily by their individual values and beliefs in the use of discretion (Brehm and Gates 1997; Riccucci 2005; Sandfort 2000). For instance, in the context of welfare reform, Riccucci et al. (2004) find that despite welfare reform policy changes aimed at reducing access to welfare, some front-line employees did not deter clients from staying on welfare rolls—in fact, Watkins-Hayes (2009) finds that some SLBs took on a "social worker" role, in which holistic support was provided to clients, while other SLBs acted as "efficiency engineers" that emphasized getting clients off welfare and into the workplace and used eligibility requirements to regulate access to programmatic benefits. Additionally, scholars have found that SLBs chose to sanction clientele based on the perceptions of deservingness, which often reflected racially charged belief systems for SLBs of all races, leading to the unequal applications of sanctions in the context of welfare reform in Florida (Soss et al. 2011). These studies reveal that individual values and beliefs structured how SLBs chose to use discretion in welfare reform—while some SLBs utilized discretion as a force of resistance to burdensome welfare work requirements, other

SLBs used discretion to ration access to benefits and strictly enforce work requirements (Watkins-Hayes 2009). Although the literature has documented the role of individual values and beliefs as a dominating force in exercising discretion, other factors are not totally irrelevant in discretionary decisions. In fact, managerial influences such as training, performance monitoring, and leadership, as well as contextual factors, such as workload and political environments, can impact the alignment of policy goals and SLBs' priorities (May and Winter 2009; Riccucci et al. 2004). In fact, Soss et al. (2011) show that policy discourses such as neoliberal paternalism shape front-line work by influencing perceptions of clientele and uses of discretion by SLBs, which determines who gets monitored, sanctioned, and incarcerated (Soss et al. 2011). However, these practices varied widely across local agencies and among individual SLBs, suggesting that individual values and beliefs shape the use of discretion by SLBs, which introduces the potential for individual SLBs to mitigate or exacerbate the sting of administrative burden.

Indeed, in the policy environment of administrative burden, there is either the potential for SLBs to 1) enforce rules and policy directives, which may limit access to public programs, or 2) leverage discretion and available resources to counteract the forces of administrative burdens on clients that they perceive as deserving of assistance. As manifestations of individual values and beliefs of SLBs, we predict that a key factor in this process will be role perceptions, which influence the use of discretion and likely impact program access under a system of administrative burden (Maynard-Moody & Musheno 2000; Riccucci, 2005; Sandfort, 2000). This expectation is grounded in previous literature that finds varying role perceptions, with some SLBs going out of their way to help those who need it no matter the consequences and others acting within the strict set of rules and boundaries to act in compliance with the law and higher level administrators (Maynard-Moody and Musheno 2000; Watkins-Hayes 2011). This divergence in the use of

discretion is inextricably linked to the ways in which SLBs perceive their role in the

implementation of a program. For instance, Watkins-Hayes (2009) finds that there are three main

bureaucratic role perceptions for welfare caseworkers—social workers, efficiency engineers, and

bureaucratic survivalists. These role perceptions are reflective of how SLBs use their

discretionary power—some SLBs consider themselves responsible for advocating for clientele,

so they listen to clients' multifaceted problems and provide holistic services (social workers)

while other SLBs see success as speed in processing cases and use eligibility requirements to

regulate access to programmatic benefits (efficiency engineers). In their businesslike, neutral,

detached approach to their job, efficiency engineers reject the definition of their job as social

work and define success as getting clients off welfare and into work (Watkins-Hayes 2009).

Finally, bureaucratic survivalists are SLBs who treat the job with apathy and define success as

having to put as little effort as possible into their work.[1] This project builds on this literature by

taking on the challenge Watkins-Hayes (2009) lays out for future research to: 1) verify that the

role perceptions she finds in the context of welfare reform apply to other bureaucratic settings

and 2) test whether the role perceptions of bureaucrats shape client outcomes like program

access, which she is unable to capture in her data (198).

In line with the role perceptions of "efficiency engineers", if SLBs see themselves as

agents of the "neoliberal paternalistic" state, the use of discretion might be first and foremost

about enforcing rules and protecting a valuable tax-payer funded benefit from those who would

cheat the system (Soss et al. 2011). To these SLBs, administrative burden in the application

process may be necessary to balance the budget and ensure that taxpayer dollars are not wasted

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[1] Given the difficulty in identifying this sentiment among self-reported survey answers, we utilize the two main roles that Watkins-Hayes (2009) identifies: efficiency engineers and social workers. It is entirely possible that bureaucratic survivalists are present in our survey, but drawing a parallel with this role perception to our survey would be misguided due to our inability to capture the central theme of bureaucratic survivalists—apathy.

on undeserving or cheating clientele (Schneider and Ingram 2012). These SLBs may be more likely to identify with the neoliberal paternalistic discourse and may place the primary responsibility for completing program requirements on clients who have "signed a contract to do a job and should approach the program as if it were a job" (Soss et al. 2011, 239). If clients are perceived as undeserving, SLBs may even deem eligible students ineligible.[2] In these cases, we predict that SLBs taking on a "compliance officer" role, in which the SLB is mainly concerned with making sure applicants are meeting program requirements, will be less likely to use discretion to help students overcome burdens and will be negatively associated with program access.

H1: In a program affected by administrative burden, SLBs' that take on a compliance role will be less likely to use discretion in ways that counteract burdensome programmatic requirements.

H2: In a program affected by administrative burden, SLBs' that take on a compliance role will be negatively associated with program access.

On the other hand, a SLB taking on responsibility for fulfilling the program goals of expanding access to educational opportunities may use discretion to increase resilience to the administrative burdens similar to the "social worker" SLBs in Watkins-Hayes (2009). Learning costs, along with psychological and compliance costs, may be formidable only in situations where SLBs do not take on the responsibility for reducing these costs. If part of the perceived role in implementation involves making sure students do not feel the stigma, information asymmetry, and compliance burdens in the application process, clients may be able to overcome

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[2] In a high profile 2017 case, Bailey White, valedictorian for Pond Creek-Hunter High School, sued the school for certifying her as a juvenile delinquent, which resulted in denial of the Oklahoma's Promise scholarship (Felder, 2017). Although the student had been involved in a non-adjudicated shoplifting incident three years prior to high school graduation, she had never been disciplined by the school and was even allowed to continue playing sports for the school. The OSRHE, based on advice from the Oklahoma Attorney General, reversed the decision to deny the scholarship for Ms. White (Felder, 2017).

administrative burdens and gain access to the program. These SLBs, because they believe their role to be a client advocate or "support official", may even use discretion to bend the rules on behalf of an applicant they consider deserving of program access. Therefore, we predict that SLBs taking on a support role will likely use discretion in ways that reduce learning, compliance and psychological costs for applicants and facilitate a higher level of program access.

H3: In a program affected by administrative burden, SLBs' that take on a support role will be more likely to use discretion in ways that counteract burdensome programmatic requirements.

H4: In a program affected by administrative burden, SLBs that take on a support role will be positively associated with program access.

Finally, we predict that administrative capacity will moderate the relationship between role perception and program access. This expectation is grounded in previous studies that have found that despite discretion serving as "a critical tool, allowing street-level bureaucrats to minimize or maximize the economic or social support that clients receive and the surveillance to which they are subject" (Watkins-Hayes 2009; i235), "bureaucrats are constrained in what their agency considers efficient and what the program rules require", "creating a constant tension between the demand of the agency and the needs of clients" (Watkins-Hayes 2009; p. i234). Based on these findings, it is possible that despite the desire of street-level bureaucrats to use discretion in ways that help clients overcome administrative burden, the constraints they face from administrative capacity may override their efforts on behalf of students. Specifically, when counselors find themselves in schools that are deeply impoverished with limited resources to draw on, the constraints may be insurmountable—in these schools, role perceptions, generous uses of discretion, and going above and beyond to support students may not translate to significant impacts on program access.

H5: When counselors are working in highly impoverished schools, constraints on administrative capacity will override the impact of role perception on program access.

The Oklahoma's Promise Program

The Oklahoma Promise's program is a means-tested financial aid policy designed to increase college access by covering the full cost of tuition for low-income students planning to attend Oklahoma colleges (Oklahoma State Regents for Higher Education 2017). We strategically select Oklahoma's Promise Program as the test case for our hypotheses for two main reasons: first, the program offers the opportunity to validate findings from previous literature in an unexplored policy area; second, the program requires students to meet a stringent set of requirements, including recurring means-tests and conduct requirements that resemble the programs in administrative burden literature and reflect an abnormally burdensome state financial aid program.

To the first point, the exploration of a new policy area offers the opportunity to apply insights from administrative burden and street-level bureaucracy to a new context with a clientele population that faces challenges similar to those in previous studies. For instance, while students may seem like a group whose social construction differs substantially from clients of public assistance programs, recent research shows that students, like welfare mothers, uninsured, and unemployed are ranked by the public as extremely similar in terms of deservingness and are both classified as dependents in the social construction theory categorization (Kreitzer and Smith 2018). As a result of being in the dependent category, both welfare recipients and college students receive demeaning benefits that often include burdens in the application process, which limit the distribution of resources to those that are considered deserving, as opposed to the "undeserving poor" (Schneider and Ingram 2012). Just as some clients were treated as more

deserving of public assistance than others (Soss et al. 2011; Watkins-Hayes 2009; Jilke and Tummers 2018), some students are framed as more deserving of financial aid than others— students who have access to advanced courses in high school and support at home from college educated parents are framed as being "college material" while students without the same level of support, often due to structural inequality, are not identified as being deserving of a college education (Bell et al. 2009; Perna and Thomas 2009; Meyer 1970). Thus, the target population is similarly socially constructed to those in previous literature, but the application of administrative burden and street-level bureaucracy lenses to this new policy area offers the opportunity to test theory in a new policy domain.

Second, we select Oklahoma's Promise because, despite its goal of reducing these structural inequalities in college access for these marginalized students[3], the program exemplifies the demeaning benefits described by Schneider and Ingram (2012) by including requirements that impose compliance, learning, and psychological costs on applicants.[4] Like the difficulties that welfare and Medicaid applicants face in the application process, students and parents applying for financial aid face difficulty in 1) understanding the program requirements and "accurately estimating their eligibility in the years preceding college", 2) complying with the "complicated paperwork and procedural requirements", and 3) developing the psychological strength to overcome the stigma associated with the recurring means-tests along the way (Dynarski and Scott-Clayton 2006, 116). In fact, even in programs with significantly less administrative burden than Oklahoma's Promise, the costs associated with submitting the Free

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[3] As Moynihan et al. (2015) note, "high-achieving low-income students face learning costs that their better-advised high-income peers do not" (45).

[4] Like the federal free and reduced-price lunch program, which has a similar income cut off, applicants for the Oklahoma's Promise program likely experience stigma due to the means tests (Bhatia, Jones, and Reicker 2011; Pogash 2008; Mirtcheva and Powell 2009).

Application for Federal Student Aid (FAFSA) are often a significant barrier for low-income and first-generation students in making it to college (Dynarski and Scott-Clayton 2006; Deming and Dynarski 2009). Oklahoma's Promise, in opposition to other state and federal means-tested or merit-based financial aid programs, requires students to enroll in 8th, 9th, or 10th grade, and meet a long list of requirements before being deemed eligible. In the initial application process in middle or high school, students must submit the five page application form, provide income documentation (i.e. parent/guardian's tax returns), provide citizenship documentation, and sign an agreement stating that they will do their homework, refrain from skipping school, refrain from abusing drugs or alcohol, and refrain from committing criminal or delinquent acts.[5] These students also have to provide additional information if it is requested to verify eligibility—this often happens for children who are adopted or in foster care or whose parent/guardians are divorced. In addition, once the student is a high school senior, they must apply for other financial aid through filling out the notoriously burdensome FAFSA application and a counselor must certify that they have completed the 17 unit core curriculum, made at least an overall 2.5 GPA and a 2.5 GPA in the core curriculum, and maintained compliance with all of the conduct requirements. After the student has been deemed eligible in middle and high school, they also face annual means-tests, conduct requirements and academic requirements while in college.[6] This complexity in the set of eligibility requirements is abnormal for a state financial aid program. As a point of comparison, the Florida Student Assistance Grant program is a means-tested financial aid program that only requires students to complete the FAFSA application when they graduate high school. Other merit-based financial aid programs, like the Georgia HOPE and

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[5] The GPA requirement is commonly misunderstood by students according to counselors—many students assume they need to make a 2.5 overall GPA but the requirement is actually that the student must make a 2.5 GPA in the core classes, which the counselor calculates themselves.

[6] The full list of eligibility requirements and the application form in Appendix A.

West Virginia PROMISE, require students to make a 3.0 GPA or make above a certain ACT/SAT score, but the school proactively sends the state the list of students that met requirements so that students are not burdened with complex paperwork (Deming and Dynarski 2009; Scott-Clayton 2011). These programs are the norm for state financial aid, with Oklahoma's Promise presenting perhaps the most extreme case of administrative burden in state financial aid in the nation.

Moreover, the programmatic requirements are implemented through both the Oklahoma State Regents for Higher Education (OSRHE), which is the centralized state agency responsible for administration of the scholarship program, and through a decentralized system of SLBs including counselors, school administrators, and grant-funded staff for federal programs such as TRIO, Upward Bound and GEAR UP. While Oklahoma's Promise is stringent and prescriptive regarding its eligibility requirements, substantial discretion is delegated to the decentralized K-12 school system in compliance certification and program advertisement. SLBs are responsible for interpreting state laws, including the symbolic messages embedded in the policy design, and translating the policy design into local practices (Schneider and Ingram 2012). This responsibility includes determining how and when to inform students about the program; deciding whether or not to meet with parents and whether or not to provide personalized support; designing procedures for monitoring student eligibility over the course of high school; deciding how closely to monitor compliance (if at all); and certifying compliance with key programmatic requirements, such as those related to academic achievement and conduct. In fact, because the state has not defined what it means to "attend school regularly" and "avoid criminal activity and substantive abuse", each SLB decides what it means to be compliant with the conduct requirements. Therefore, the Oklahoma's Promise scholarship program—as opposed to a

financial aid program that is automatically awarded to students based on income or academic merit like the former Social Security student benefit program or the West Virginia PROMISE (Dynarski and Scott-Clayton 2006)—requires the interaction of SLBs and students in the application process. Therefore, despite operating under the same state policies, front-line employees maintain high levels of discretion in how they conceive of and carry out their duties as implementation officials in the Oklahoma's Promise program. Together, the Oklahoma's Promise program is an ideal venue for building on administrative burden literature both because it represents a previously unexplored policy domain and because it involves a similarly socially constructed clientele population faced with a burdensome, decentralized application process.

Research Design

To investigate the influence of SLBs on access to the Oklahoma's Promise program, we leverage data from four main sources: first, we utilize a statewide survey of SLBs in charge of implementing the Oklahoma's Promise program; second, we supplement the survey data with in-depth interviews; third, we leverage data available through the National Center for Education Statistics (NCES) Common Core Dataset (CCD) on high school characteristics; and fourth, we gather data from OSRHE on the number of students in each high school enrolling in the promise program in the most recent year available (2015-16).[7]

The statewide survey data was completed by 167 high school personnel involved in administering the Oklahoma's Promise program in May 2018.[8] This sample reflects the

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[7] Thanks to our partnership with the Oklahoma State Regents for Higher Education, and their shared interest in this study, we worked closely with them to obtain the list serves of high school counselors to survey and interview. These results will be shared with them to facilitate potential policy changes that could increase access for eligible students across Oklahoma.

[8] Specifically, we partnered with staff at the Oklahoma State Regents for Higher Education (OSRHE), who sent out the recruitment email to the listserv of counselors and administrators at schools across the state to implement Oklahoma's Promise program.

observations for which we were able to match the survey data with the high school level data and the observations for which we know the respondent was working at the same high school back in 2015—the year in which we observe student access. These respondents represent 134 unique high schools across the state, which allows us to observe the patterns across a large set of schools that contain rich variation in urbanicity, administrative support, and access to resources.[9] We incorporate a series of survey questions that control for other factors that impact the strategic use of discretion outside of the main role perception measures (May and Winter 2009). The measurement and operationalization of these controls is described in the Appendix D.

Next, we gathered data from the NCES on the number of students eligible for free or reduced-price lunches as well as the total enrollment and other descriptive characteristics of each high school in the 2015-16 school year. This data helps us to account for the total client population and the proportion of students that are likely eligible for the Oklahoma's Promise scholarship program at each high school.[10] We then matched the survey data and the NCES data to the data on the number of Oklahoma's Promise recipients by high school in the 2015-16 school year provided by OSRHE. Based on this data, we construct our dependent variable—the proportion of students enrolling in the Oklahoma's Promise in each high school out of the total enrollment.

We supplement the findings of the quantitative survey data with evidence from in-depth semi-structured interviews. A total of six interviews were conducted, with interview participants

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[9] We account for the instances in which we have multiple respondents from the same school in the analytical approach section in the clustering of the standard errors. Moreover, we also run the analysis on the sample that does not include multiple respondents from the same school and find the results are remarkably similar. These results are available upon request.

[10] Utilizing the free and reduced-price lunch enrollment as a proxy for the potentially eligible population for the Oklahoma Promise is an ideal approach given that in the 2015-16, families with 5 or less family members had to make less than $55,000 in order to receive free or reduced-price lunches (Federal Register 2015). Therefore, this group of kids would meet the income eligibility requirement, which serves as one of the main mechanisms for determining eligibility for the Oklahoma Promise Scholarship.

representing urban, suburban, and rural school sites.[11] Interviews were conducted via phone, audio-recorded, and lasted approximately 30 to 45 minutes in length, producing 103 pages of transcripts. We utilized an interview protocol to guide the interview, and asked probing questions to elicit rich discussion on certain topics of interest that emerged.[12] We analyzed this interview data using a deductive, positivist approach (Su 2018; Corbin and Strauss 2007) to facilitate a deeper understanding of the on-the-ground realities and constraints of the SLBs' task environments as well as the influence of their personal values and belief systems, adding color and richness to our quantitative findings.

Quantitative Data Description

Table 1 shows that most respondents were serving as counselors, but that 11 percent of respondents are serving in more than one position. In the inadequately funded system of K-12 education in Oklahoma, it is not altogether surprising that some administrators are also expected to serve as counselors and cover other staffing shortages (Education Week 2018).[13] In terms of demographics, the survey sample is overwhelmingly female with high levels of education and the modal annual income between $50,000 and $100,000. The sample is also mostly white (82

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[11]In accordance with purposeful sampling, we initially reached out to counselors from 5 high-performing and 5 low-performing schools recommended by OSRHE Oklahoma's Promise staff, as measured by the percentage of students enrolling in Oklahoma's Promise. Finding no willing participants, we subsequently reached out to 38 survey respondents who indicated in their survey that they might have interest in participating in a follow-up interview. The schools represented by interviewees varied in size and program access. See Appendix B. Four interviewees were high school counselors, one served as the assistant director of an Upward Bound program, and one served as an assistant superintendent in addition to being the counselor for the school.

[12] In addition to follow-up interviews, we also engaged in multiple informal conversations with OSRHE staff that informed our understanding regarding how authority and tasks are delegated to local K-12 schools in the implementation of the program.

[13] In fact, this was a theme that emerged from the interviews. Interviews revealed that counselors themselves maintain responsibility for multiple functions, which often vary by school. These duties include but are not limited to course scheduling, credit checks, IEP and 504 plans, responding to parent and student questions, addressing teacher concerns, administering standardized tests such as the ACT and Pre-ACT, attendance checks, providing letters of recommendation, disseminating college preparation and financial information, crisis intervention, and lunch duty.

percent), with 56 percent of the sample identifying as somewhat or strongly conservative and 54 percent identifying with the Republican party.

[Insert Table 1 here]

Next, the survey data reveal substantial variation in the self-identified role of the respondents as well as their access to resources and time spent on college preparation. Table 1 shows that approximately 50 percent of the respondents identified with the "compliance officer" and "information disseminator" roles. Moreover, 62 percent of respondents identified as a "student support official". It is important to note that this question allowed respondents to be able to identify with more than one role, if desired.[14] The measurement and operationalization of these role perception variables and the uses of discretion variables are described in Table 2 below. The information dissemination is treated as the neutral category, with support and compliance roles being the variables of interest based on the theoretical hypotheses.

[Insert Table 2 here]

The descriptive statistics also demonstrate that, on average, less than half of the respondents' time is spent on college preparation (44 percent) but that the average SLB is able to meet with almost 80 percent of students one-on-one. Additionally, 13 percent of survey respondents indicated that they partnered with a community organization in the implementation of the Promise program. The average respondent indicated the perceived family incomes of their school population was about the same (3) or slightly lower (4) than the surrounding area and the perceived administrative support of efforts on behalf of students applying for the Promise program was generally low.

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[14] See appendix C for a breakdown of how many SLBs were in each combination of categories.

Finally, the data from CCD help provide a picture of the school level characteristics. This data reveals that the average high school in the sample had 574 students enrolled and 55 percent of students eligible for free and reduced-price lunches. Lastly, as we would expect, the proportion of students eligible for free and reduced-price lunch at each school is substantially larger than the proportion of students that end up receiving the Promise scholarship. This data suggests that there is substantial variation across high schools in the proportion of income eligible students accessing the Promise program, providing the ideal context to explore the mechanisms by which administrative burden translates to restricted program access at the local level. Indeed, given the burdensome application process and the decentralization of authority to the K-12 school system, it comes as no surprise that OSRHE estimates that only half of income eligible students gain access to the Oklahoma's Promise program (Southern Regional Education Board 2018),[15] while scholars estimate that approximately 85 percent of eligible students received the West Virginia PROMISE (Scott-Clayton 2011). Moreover, Figure 1 demonstrates that the statewide program access data masks significant underlying variation in program access across local agencies, which will be explored in our analysis below.[16]

[Insert Figure 1]

Quantitative Analytical Approach

We model the variation in uses of discretion and the proportion of students gaining access to the Oklahoma's Promise program at each high school as a function of the role perception in addition to a set of control variables capturing organizational as well as individual factors that

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[15] In this report, evaluators actually highlighted the low proportion of income eligible students gaining access as the main area for improvement and recommended that the state provide additional supports for income eligible students in middle and high-school.
[16] Figure 1 shows that there is substantial variation in the proportion of students gaining access to the Promise program in our survey sample and that the survey sample approximates the state-wide population. For an extended exploration of the representativeness of the sample see Appendix B.

have been identified as important in previous studies on street-level bureaucracy. At the individual level, these factors include education, race, gender, ideology, party identification, perceived support from administration, the number of years they have been working in the position, and the task environment (X_i).[17] At the organizational level, we include the proportion of students in the FRL program and the perceived average family income of the school (X_s). The key outcome variables of interest are modeled as a function of these sets of variables in the following equation:

$$Y_s = \alpha + R_i\delta + X_{is}\beta + \varepsilon_i \qquad (1)$$

where Y_s represents strategic uses of discretion and the proportion of school enrollment that gains access to the Oklahoma's Promise scholarship, α is the constant, ε_i is the error term, X_{is} are the independent variables at the individual (i) and school level (s) and R_i are the dichotomous role perception variables.[18]

Quantitative Findings

Does Role Perception Impact Strategic Uses of Discretion and Program Access?

The analysis testing the influence of role perception on the use of discretion is presented in Table 3. In line with the theoretical hypotheses, these models demonstrate that SLBs identifying as a support official are more likely to use their discretionary power in ways that empower students to overcome administrative burden—these SLBs employ a larger number of strategies to inform and support students and are approximately 16.3 percentage points more

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[17] We examine whether the correlation between variables like ideology and party identification are problematic but find that including both variables does not introduce multi-collinearity issues.

[18] We cluster standard errors at the school level to account for the instances in which there are multiple respondents from the same school.

likely to meet with parents in the application process. These uses of discretion by SLBs reflect crucial interventions that previous research has shown helps students overcome learning, compliance, and psychological costs in applications for financial aid (Bettinger et al. 2009; Dynarski and Scott-Clayton 2006).[19] Unlike the support role, which is associated with a significant increase in the number of strategies utilized to provide information and personalized support, the compliance officer role is insignificant although substantively negatively related to the number of strategies and likelihood of meeting with parents. Therefore, while support officials are going above and beyond to alleviate information, compliance, and psychological costs for students by employing a larger number of strategies and meeting with parents, compliance officers are not employing the same multi-pronged, high-touch strategies. This provides support for Hypothesis 3, suggesting that role perceptions translate to different uses of discretionary power.[20] These models also reveal that ideology, race, and support from administration are important predictors of uses of discretion—white SLBs are less likely to meet with parents, conservative SLBs utilize a smaller number of strategies to support students, and SLBs with higher levels of administrative support take on a larger number of strategies.

[Insert Table 3 Here]

Next, we present the analysis testing the influence of role perception on the proportion of students accessing the Oklahoma's Promise scholarship in Table 4. These results reveal that role perception is significantly related to program access, providing support for Hypothesis 2 and Hypothesis 4. In high schools where personnel indicated that they perceive their role as a "compliance officer", fewer students complete the application requirements and enroll in the

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[19] In fact, in the most recent experiment on the topic, researchers found that the only treatment producing significant gains in FAFSA completion and college access was the group provided with both information and personalized support—the treatment group providing only information had a null effect on student outcomes (Bettinger et al. 2009).
[20] We further test the relationship between role perception and uses of discretion in Appendix E, in which we interact the support and compliance role perceptions.

promise program. On the other hand, high schools that employ SLBs identifying as "student support officials" were significantly positively related to the proportion of students enrolling in the promise program. These findings reveal that the role perception of SLBs is significantly related to the ability of students to overcome the barriers of administrative burden and gain access to the promise program.

Moreover, the results in Table 4 also reveal relationships between the control variables and the level of program access. For instance, Republican party identification was highly predictive of program access ($p<0.05$). Identifying with the Republican party was associated with a 2 percent reduction in the proportion of students overcoming administrative burden and gaining access to the program. This finding likely reflects the role of political beliefs in shaping interpretations of burden, further indicating the importance of values and beliefs of SLBs (Lavertu et al. 2013). Finally, the findings highlight the importance of task environments in predicting access. For instance, the more students the SLB is able to meet with one-on-one, the more likely the school is to have a higher proportion of students able to overcome barriers and gain access to the program ($p<0.01$).

[Insert Table 4]

Given the potential for SLBs to take on multiple roles, we also include a specification with an interaction between the support and compliance role in Column 2 of Table 4. This reveals that SLBs identifying only with a support role are insignificantly related to program access.[21] On the other hand, counselors that take on only a compliance role are significantly negatively associated with program access at an even higher substantive magnitude than the

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[21] We investigated this further by interacting the support role with partisanship and found that while support officials who identify with the Republican party were negatively associated with program access, non-Republican support officials were the ones positively related to program access.

previous results—substantively, this coefficient translates to approximately 421 students not gaining access to the Oklahoma's Promise scholarship program and around 1.4 million dollars in average aid in a single year in the sample of schools across the state.[22] These findings suggest that it is likely easier to prevent access than promote access, which is in line with previous research on welfare reform (Watkins-Hayes 2009). For instance, if an SLB has gone above and beyond to support students by certifying compliance with all of the academic and conduct requirements, parents still may fail to send in the required income or citizenship documentation. Therefore, while "student support officials" may do everything in their power to promote access, they still may face challenges in facilitating student access. On the other hand, all it takes to prevent access is refusing to certify compliance on any of the long list of requirements, which makes restricting access much simpler than going above and beyond to increase student resilience to administrative burdens.

Lastly, in schools where counselors take on both the support role with the compliance role, there are significantly more students gaining access to the program—the linear combination of the coefficients is equal to an increase of approximately 2 percent (p<0.05) which translates to an estimated 631 students gaining access and approximately 2 million dollars in state funds in the sample of schools in a single year. These findings suggest that taking on the support role, in addition to the compliance role, counteracts the negative association we find with those counselors who are only identifying as "compliance officers". Moreover, the findings suggest that the SLBs only identifying with the compliance role and not with the support role may be more akin to the efficiency engineers that Watkins-Hayes (2009) highlights, who have a

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[22] These calculations are based on the multiplication of the coefficient, the average enrollment of schools in the sample, and the number of schools where an SLB takes on each role. For the amount of aid, I multiply the number of estimated students affected by the average scholarship awarded to Oklahoma's Promise recipients in 2015.

detached businesslike approach to their job and ration access to benefits through strictly

enforcing requirements for those they consider undeserving. On the other hand, for SLBs taking

on both compliance and support roles, monitoring compliance may be part of their job to provide

holistic services so that they can support students that need assistance in meeting complex

requirements (Watkins-Hayes 2009). Moreover, it is possible that, in policy regimes of

administrative burden, it may take more than just a support role and may also take a dual focus

on compliance to promote access. Afterall, even if students feel supported and can overcome the

psychological and learning costs, they still must meet the standards for compliance to gain access

to the program. Together, these findings reveal that role perceptions of SLBs meaningfully

impact uses of discretionary power and program access for clientele.

Does Administrative Capacity Moderate the Relationship between Role Perception and Program
Access?

To test the final hypothesis, we present the regression analysis where we interact the role

perception variables with a dichotomous indicator for whether the school is highly impoverished

which we define as having greater than 75 percent of the student population eligible for free and

reduced-price lunch program.[23] In line with our expectations in Hypothesis 5, being in a highly

impoverished school with restricted administrative capacity moderates the relationship between

SLB role perception and program access. When SLBs are situated in highly impoverished

schools, the association between role perception and program access diminishes, but in the

schools that are not highly impoverished, role perception is significantly predictive of program

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[23] The free and reduced-price lunch program is the best available indicator for the proportion of low-income students attending each school. We choose 75 percent as the cutoff for highly impoverished schools because this reflects the schools above the 90th percentile of the distribution in our survey. 27 out of the 134 schools in our survey are classified as highly impoverished based on this definition. Moreover, we checked to make sure there is sufficient variation in the role perceptions among the counselors working in schools that are highly impoverished (around half of counselors working in highly impoverished schools identify with the "support official" role and half of the counselors working in highly impoverished schools identify with the "compliance officer" role).

access. These highly impoverished schools often have the least time, capacity, and resources to help students with financial aid and college application processes despite enrolling the students who are most in need of assistance in financial aid and college application processes—counselors in these highly impoverished schools are often forced to focus on improving standardized assessments to avoid potential repercussions from state accountability policies instead of being able to facilitate college going behavior (Perna and Thomas 2009). This is highly problematic from an equity standpoint, suggesting that the students in the most disadvantaged schools are also the least likely to receive assistance from SLBs that help alleviate administrative burden. In light of the findings from Watkins-Hayes (2009), this suggests that administrative capacity is an important moderating factor in the ability of SLBs to influence outcomes. In the following section, we leverage our interviews to contextualize these quantitative findings and describe of the on-the-ground realities of SLBs in the implementation of the Oklahoma's Promise program.

[Insert Table 5]

Supplementary Qualitative Evidence

The qualitative evidence in this section supplements the quantitative analysis by providing a window into the lived experiences and on-the-ground realities of SLBs implementing the Oklahoma's Promise program. The following sections are broken up into three themes: 1) high school counselors' role perceptions and the use of discretion, 2) the self-identified role and beliefs about responsibility, and 3) how administrative support and institutional capacity constrain SLBs' ability to facilitate program access.

Role Perception and Discretion: Routine Activities vs. Going the Extra Mile

Our follow-up interviews with survey respondents suggest that role perceptions translate to different uses of discretion, and specifically in decisions to engage in routine activities or to "go the extra mile." In taking on a compliance role, counselors review lists of students with incomplete applications, conduct regular credit checks to ensure students are on track to complete curricular requirements, and verify completion of course requirements and grade point averages. Counselors also function as disseminators of information about the Oklahoma's Promise program. In this capacity, counselors and other front-line personnel communicate information about Oklahoma's Promise to students and their families as well as correct misinformation about the program. Finally, the support role appeared to manifest as the way in which counselors choose to engage in the compliance and information activities. Counselors can choose to take on passive roles and engage in routine activities or they can take on a student support role and go the extra mile in their efforts to facilitate compliance and disseminate information.

The passive role, in which counselors engage in routine information dissemination and compliance activities, consists of outreach strategies such as group presentations, distribution of flyers, mass communication through text messages or e-mails, etc. As an example, in describing her responsibilities for college preparation and financial aid awareness activities, one counselor (Participant 3) noted:

> In general, mostly it's the seniors I work with on college and scholarships. Don't
> really have a lot of time with the younger ones. And so, I ended up spending most
> of my time with the older ones…I go into the classroom with juniors and seniors
> and talk about college scholarships. I attempt to maintain a scholarship page, but I
> get behind on it honestly. But a lot of the students come to me when they need

something as opposed to me doing as much going out to them. They come to me as

they need it.

Participant 3's statements reveals a passive approach to outreach activities, relying on students to take initiative and ownership for their interactions with the counselor by going to her when needed rather than actively reaching out to students. With regard to Oklahoma's Promise advertisement in particular, Participant 3 cites distributing "flyers that Oklahoma's Promise gives us at any event that we have" and utilizing "our all call system" to notify families of the upcoming application deadline. Additionally, in "triaging" her workload by focusing her time primarily on seniors, the counselor takes a passive role and is not helping ninth and tenth grade students in the critical period where students *must enroll* in the Oklahoma's Promise program to gain access.

While all interviewees viewed themselves as performing compliance and information dissemination functions to some extent, two interviewees strongly identified with the student support role, seeing themselves as college advocates for students similar to the "social workers" identified in Watkins-Hayes (2009). These interviewees went above and beyond, engaging in high-touch strategies that were more time consuming and involved one-on-one communication with students and/or parents. For example, Participant 5 described his efforts to assist a student obtain income documentation. While the student was a U.S. citizen, his father was an undocumented immigrant who refused to provide income documentation due to fear of deportation. Ultimately, Participant 5 assisted the student's mother in drafting a letter attesting that the father lives in Mexico but sends money to the family. In reflecting on the situation, Participant 5 noted "that was a little bit of a hurdle, but it wasn't that bad. We got it fixed

and…it's not a complaint, it's just… it was just a situation where it wasn't as clear cut and there was no quick solution, it required more work."

In another example, Participant 1 recalled a situation in which she "had a little girl, her mom, she struggled with drugs really bad, she did have like the W2s, so I even helped her mom get on Turbo Tax and file her taxes so that she would complete that so that she could have the documentation to complete her application for Oklahoma's Promise." Participant 1 also noted that she took it upon herself to communicate directly with OSRHE staff when the daughter of a personal friend was told by her school counselor that she was short one history credit and would not receive the Oklahoma's Promise scholarship. In communicating with the OSRHE, Participant 1 was able to clarify that the military studies course taken by the student did indeed count towards the history credit requirement and that the student had met the curricular requirements to receive the scholarship. These instances of going above and beyond in a support role reflect the power of SLBs' in reducing the onerous experiences of policy in systems of administrative burden.

Decisions to engage in routine activities or to make every effort possible to assist students access the Oklahoma's Promise scholarship highlight the potential of SLBs to serve as both policymakers and gatekeepers. In helping the student and his family provide an acceptable source of income verification while at the same time protecting the father's undocumented status, Participant 5 worked to craft a solution to a vague policy. Additionally, Participant 1's intervention to clarify the completion of course credit and help a parent fill out tax forms demonstrates the potential for role perception to translate to uses of discretion that serve as a source of client empowerment.

Responsibility for Administrative Burden: Individual Responsibility vs. Alleviating Systematic Barriers

Follow-up interviews with survey respondents indicated varying beliefs about the extent to which school personnel are responsible for facilitating student access to Oklahoma's Promise. While some SLBs view themselves as having primary responsibility, others externalize responsibility for administrative burdens related to Oklahoma's Promise to students and parents. For example, one counselor (Participant 3) suggested that many students simply do not view college in their future. While this counselor assigns primary responsibility to students for decisions to prepare or not prepare for college, she also peripherally acknowledges the immaturity of adolescents, noting the tendency for these students to "change their mind" about college attendance as high school graduation approaches. Additionally, even in instances when potentially eligible students wish to enroll in Oklahoma's Promise, many survey respondents and interview participants maintained that enrolling children in Oklahoma's Promise, submitting documentation, and ensuring that curriculum requirements are met is just not a "priority" for some parents. To illustrate, one counselor (Participant 4) observed, "Yeah, I mean there's been some where parents just are not quite with it enough to get stuff together. Yeah. And they just don't – the parents don't make it a priority." Another interviewee (Participant 6) lamented that "we can't get parents to follow through on their end" and described not taking advantage of Oklahoma's Promise as "crazy." Participant 3 blamed an underlying attitude among parents that the student is just not college material—"I think sometimes they [parents] think their kid's not going to go to college. They're just going to go to work, and so they're not thinking that's really in the child's plan."

Perceptions regarding student and parent priorities as well as student status as college-bound appear to be related the degree to which counselors internalize their level of responsibility for helping students overcome administrative burdens and judge their own performance. For example, with regard to their role in information dissemination, two counselors (Participant 2 and Participant 3) maintained that information about Oklahoma's Promise is frequently distributed to students, but students often to do not relay this information to parents. As Participant 3 noted, one major barrier to access is "probably just the information actually getting to their parents. We get it to the kids pretty frequently, but then the kids don't get it to their parents." In passing responsibility to students for communicating information about Oklahoma's Promise to their parents, SLBs generally demonstrate a passive, perfunctory role in the implementation of the program.

In contrast to beliefs about student and parental responsibility held by front-line staff focused on compliance and information roles, the two interviewees exhibiting a support role were more likely to recognize the role systematic barriers play in preventing access to the Oklahoma's Promise scholarship. For example, in describing the need for more centralized and dedicated staff to assist students enroll in Oklahoma's Promise, Participant 1 acknowledged poverty and low parental educational attainment as significant college access barriers for students.

> Because especially, like Oklahoma, our poverty rate is so high, but then we also have a high area of like rural areas where, you know, those families in the rural areas are less likely to have any kind of post-high school education. So they just don't know. They're just uninformed.

In addition to poverty and a lack of college-going culture, many students also face psychological barriers to college access. One interviewee (Participant 5) maintained that low self-esteem prevented some students from enrolling in the program. He commented that students sometimes think, "I don't think I can do it. I really would like to go to OU, but I'm probably not going to get in."

In recognizing these systematic barriers to college access, it's important to note that "student support officials" also seem to assume more personal responsibility for the role they play in helping students overcome these obstacles. To illustrate, in addressing the problem of parent-child communication, Participant 5 described taking a more proactive and assertive role in assisting students overcome administrative burdens:

> Another problem that I've picked up on is the parent-offspring communication or lack thereof. In other words, didn't you do it? No, I thought you did it. No, I thought you did it, no I thought you did it. Well somebody's got to do it, let's get it done right now. Let's not let another day go by, there's the computer, you and your mom go sit over there and do it.

This section reveals that while some SLBs think that the parents or students bear primary responsibility for access, others blame an inherently inequitable system and exert additional effort to assist students in need of help. Therefore, beliefs about responsibility may be an important underlying factor related to how SLBs perceive their role in implementation.

Administrative Support and Capacity

An additional element that emerged from the qualitative evidence was the importance of administrative support and capacity. For example, one counselor noted that her school

administrators are generally supportive of Oklahoma's Promise, but "they're not a school that says we need to get as many signed up as we can." When administrators do not explicitly make Oklahoma's Promise enrollment a top priority, advertising the program and working closely with students to ensure access can take a backseat to other duties, such as testing, course scheduling, and crisis intervention. As another interviewee put it, "because counselors have so many other duties, it's not that this isn't a priority but when administrators don't put this on your list of things to do, you kind of have to stick to your list. It does take going above and beyond and using your own time and not all counselors are going to do that." Therefore, when street-level personnel perceive higher levels of support from administration, they are more likely to help students overcome burdens and gain access.

Moreover, our qualitative data indicate that unequal organizational capacity plays a role in constraining SLBs' ability to facilitate high levels of program access. In particular, our interviewees described the struggle to balance their many job responsibilities with providing one-on-one support to students during the Oklahoma's Promise application process. For example, in describing her responsibilities at a rural school serving approximately 800 Pre-K-12 students, one interviewee asserted that she did "anything and everything under the sun" including curriculum development, supervising alternative education students on a daily basis, substituting in the classroom for absent teachers, and serving as the school's primary counselor for high school students. As Participant 1 observed, her fellow counselors are "just spread so thin, that they don't have the time that it takes to dedicate to something like Oklahoma's Promise to make sure that every student eligible applies, every student eligible, you know, has their parent send in their…information."

Furthermore, the schools with the highest proportions of potentially eligible students may have the least capacity to meet student needs. For instance, one counselor noted that:

> "Since many of our students will be first generation college students and 70% of our school receives free/reduced lunch our students need more support. Unfortunately much of time is spent testing during peak seasons, we cannot possibly help all of our kids in a timely manner."

Previous research further supports these comments, with Perna and Thomas (2009) finding that counselors in lower-resourced schools devote a disproportionate amount of time on standardized testing and improving exam pass rates, "thereby reducing the ability of counseling services that are more directly related to college going" (475). Therefore, institutional environments matter— SLBs in schools with less supportive administration and high concentrations of disadvantaged students face capacity constraints that restrict the ability to go above and beyond for clientele.

Conclusion

In this study, we connect the administrative burden literature with the foundational insights of street-level bureaucracy research to investigate the influence of SLBs' role perceptions on strategic uses of discretion and client access to the Oklahoma's Promise program. Three main findings emerge from our analysis: 1) SLBs' taking on the "student support official" role utilized discretionary power to go above and beyond to assist students in overcoming administrative burden; 2) the interactions between SLBs' role perceptions meaningfully influence levels of program access in local agencies; and 3) administrative capacity moderates the impact of role perception on program access. Together, these findings indicate that the role perceptions of SLBs influence not only uses of discretionary power but also the proportion of

clientele that overcome administrative burden and gain access to the transformational benefits provided by Oklahoma's Promise program.

These findings have several implications for research at the intersection of street-level discretion and administrative burden. First, SLBs taking on the "student support official" role resemble the "social workers" in Watkins-Hayes (2009), in that they use discretion to provide holistic services that often require SLBs to go above and beyond to support clientele in the battle with costly administrative burdens. This provides support for the notion that role perceptions found in Watkins-Hayes (2009) transcend welfare policy and are more broadly applicable across policy areas. Moreover, given the previous research demonstrating the importance of high-touch, personalized assistance in burdensome financial aid applications (Bettinger et al. 2009; Deming and Dynarski 2009), the findings suggest that the negative association between "compliance officers" and program access may be one of two different scenarios. First, it is possible that compliance officers proactively reduce program access by deeming eligible students ineligible or by utilizing a detached businesslike approach focused on efficiency rather than equity. On the other hand, it is also possible that compliance officers simply do not go above and beyond to support students that need holistic personalized assistance to overcome learning, compliance, and psychological barriers. With additional data from student perspectives, we would be able to determine if compliance officers demonstrate the actions identified in previous studies such as losing paperwork, deeming eligible students ineligible, or being cold and distant (Brodkin and Majmundar 2010; Soss et al. 2011). However, given the limitations of our survey data for identifying whether compliance officers are proactively or passively impeding program access, we present this as an area for future research to explore.

Second, we find that role perceptions interact in ways that impact program access—a finding that is unique and provides significant insight for understanding the complexities of street-level discretion in environments of administrative burden. Specifically, the interaction between the "compliance officer" and "student support official" roles reveal that when clients face information, psychological and compliance barriers, SLBs that take on both support and compliance roles are positively associated with program access. However, the SLBs taking on only a compliance role are negatively associated with program access and SLBs taking on only the support role are insignificantly related to program access. Together, these findings suggest that the compliance role perception, on its own, may be similar to the detached, businesslike "efficiency engineers" identified in previous studies (Watkins-Hayes 2009). However, when SLBs take on both the support role and the compliance role, this dual focus may serve to empower clientele to overcome administrative burden. This is likely because the "compliance officer" role, by itself, does not include the type of holistic support that may be necessary for overcoming information and psychological barriers such as stigma, low self-confidence, and loss of autonomy. Likewise, the "student support official" role, by itself, may be alleviating psychological costs, but may leave the compliance costs unaddressed and therefore fail to meet client needs. Together, however, these two role perceptions may serve to alleviate both the psychological, learning, and compliance barriers that clients face in their interactions with the state. This proposition should be further tested in future research on street-level discretion and administrative burden to confirm that the interactions of role perceptions are important in predicting client access in other bureaucratic contexts.

Finally, we find that when administrative capacity is limited, SLBs are likely less able to have the resources to impact client experiences of government programs. This finding is both

theoretically and normatively important. From a theoretical standpoint, this provides further

evidence that institutions bear down on front-line employees, creating a tension between agency

expectations and client needs in more than just welfare policy (Watkins-Hayes 2009, 2011).

Indeed, this suggests that role perception or "How worker A versus worker B define themselves

as professionals, and the discretionary toolkits that they wield in the service of those self-

definitions" may only be influencing service delivery when there is sufficient administrative

capacity (Watkins-Hayes 2009, 188). This has serious normative implications, especially

because agencies serving the most disadvantaged clientele often have the least resources

available for supporting clientele through compliance, information, and psychological barriers.

In this way, the results suggest that the politics of administrative burden penetrates the street-

level through hard-wiring policy with stringent eligibility requirements and delegating the

implementation of burden to local agencies with vastly unequal capacity. In effect, because of

the burdensome programmatic requirements, decentralized implementation structure, and

inequality in local agency capacity, programs like Oklahoma's Promise may fail to achieve the

goal of reducing systemic inequality for the most disadvantaged, low-income clientele. However,

while the delegation of responsibility by state agencies down to the street-level in these programs

may be a vehicle for perpetuating inequality, it also provides insight into efforts that could

reduce the detrimental impacts of administrative burden (Herd and Moynihan 2018). For

instance, in the interviews, 5 out of the 6 interviewees said the program could be improved by

the state taking on more responsibility for direct communication with students and parents so that

the concern about resources, workload, and the difficulty counselors face in providing

customized assistance to students would not serve as a barrier to access. This resembles the

recommendations made by Herd and Moynihan (2018), suggesting that if the state decided to

take on the burdens that are currently delegated to clientele and front-line workers, this could

mitigate some of the existing inequities in program access.

We conclude by noting that this study has multiple limitations that should be built upon

in future research. First, the sample of participants who agreed to participate in follow-up

interviews is small. However, these interviews provide rich detail that add to our survey findings

by illustrating the complex on-the-ground realities of front-line work in the Oklahoma's Promise

program. Second, as a result of the cross-sectional nature of our data we are not able to capture

potential feedback loops in program access—for instance, whether fewer students enrolling in a

school in one year affects the take-up in the future is an open question for future studies. These

limitations can be built upon in future research at the intersection of street-level discretion and

administrative burden with more qualitative and longitudinal data. Third, Oklahoma's economic,

political, and policy context is an essential element of the story, which makes the rich description

and case study approach appropriate, but also may limit the generalizability of the findings. For

instance, the findings may translate well to other states that have low levels of per pupil

education funding and high levels of inequality and poverty but may not reflect states in which

these conditions diverge. However, it is interesting to note that despite applying the theoretical

framework of administrative burden into the previously unexplored area of higher education

policy, many of the findings of previous research are consistent. This suggests that

administrative burden and street-level bureaucracy frameworks may be broadly applicable across

policy areas, which is another area that should be tested in the future. Finally, moving forward,

scholars should explicitly compare the explanatory power of factors like role perception with

administrative support, policy environments, administrative capacity, and task environments to

better develop a comprehensive framework for explaining variation in program access at the

local level under a system of administrative burden.

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Tables and Figures

High Schools in Oklahoma
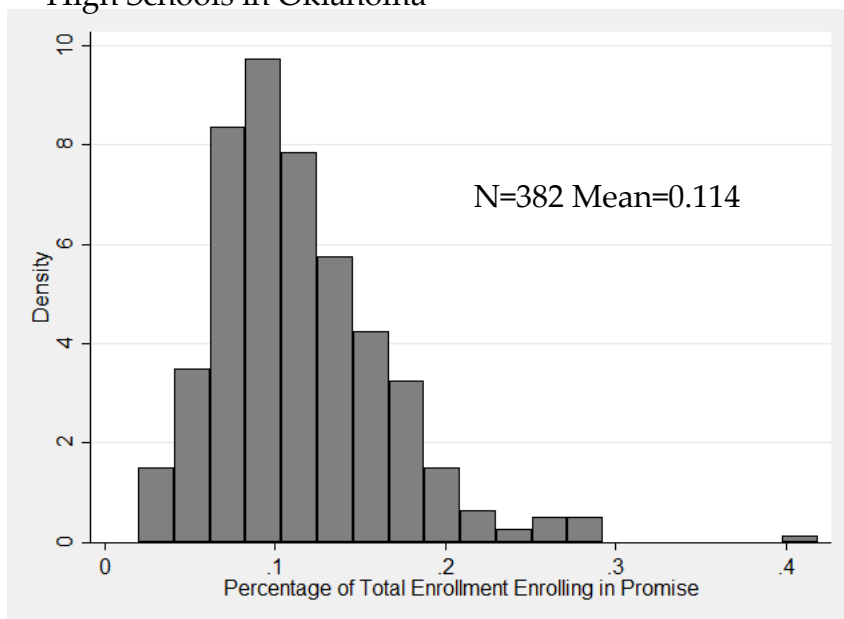
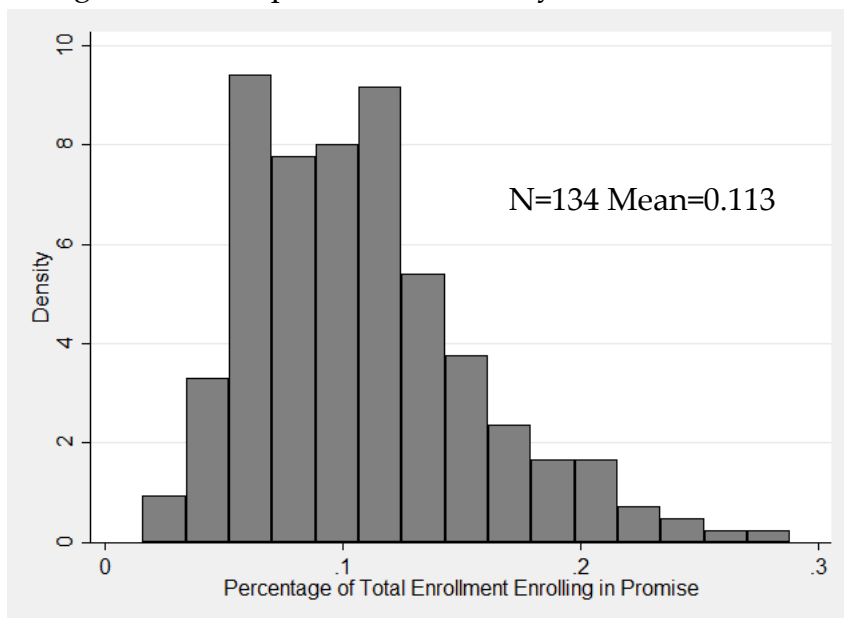High Schools Represented in Survey

Figure 1. Variation Across High Schools in the Proportion of Students Receiving the Oklahoma Promise Scholarship (2015)

Table 1. Descriptive Statistics

Variables	Source	N	Mean	SD	Min	Max
Position						
Counselor	Survey	167	0.886	0.318	0	1
Other/More Than One Position	Survey	167	0.114	0.319	0	1
Demographics						
Male	Survey	167	0.048	0.214	0	1
Income	Survey	167	2.222	0.802	1	4
Education	Survey	167	6.994	0.257	6	8
Race & Ethnic Identity						
White	Survey	167	0.820	0.385	0	1
Black or African American	Survey	167	0.018	0.133	0	1
Native American	Survey	167	0.078	0.269	0	1
Hispanic	Survey	167	0.072	0.259	0	1
Political Affiliation						
Ideology-Conservative	Survey	167	0.557	0.498	0	1
Party ID-Republican	Survey	167	0.545	0.499	0	1
Use of Discretion						
Number of Strategies	Survey	167	3.952	1.283	1	8
Meet with Parents	Survey	167	0.849	0.359	0	1
Perceived Role						
Compliance Officer	Survey	167	0.423	0.495	0	1
Student Support	Survey	167	0.591	0.492	0	1
Information Disseminator	Survey	167	0.471	0.500	0	1
Task Environment						
High Discretion	Survey	167	0.521	0.201	0	1
% of Time Spent on College Preparation	Survey	167	44.575	21.868	5	95
% of Students Able to meet One-on-One	Survey	167	79.682	29.574	0	100
School Family Income Comparison	Survey	167	3.611	0.863	2	5
Partner with Nonprofits	Survey	167	0.132	0.339	0	1
Administrative Support	Survey	167	1.054	0.275	1	3
High School Characteristics						
Total Enrollment	NCES	167	572.34	657.7	24	3489
Percent FRL	NCES	167	0.553	0.175	0.071	0.985
Percent OK Promise Recipients	OSRHE	167	0.113	0.048	0.038	0.288

Note: NCES stands for National Center for Education Statistics; OSRHE stands or Oklahoma State Regents for Higher Education

Table 2. Measurement and Operationalization of Key Variables

Concept	Question Wording	Measurement
Role Perception	Which of the following best describes the role you identify with when dealing with students applying for the Oklahoma's Promise scholarship program? Please select all that apply. • Compliance Officer: I am primarily concerned with making sure students meet program requirements and have the right documentation • Student Support Official: I am primarily concerned with helping all potentially eligible students navigate the process and ensure that as many eligible students as possible receive the Oklahoma Promise Scholarship • Information Liaison: I am primarily concerned with disseminating information about the scholarship requirements	1—Identifies with the role 0—Does not identify with the role
Number of Strategies Used to Support and Inform Students	What strategies do you use to communicate information about the Oklahoma's Promise scholarship program? Select all that apply. • Flyers around the school • Emails to parents • One-on-one counseling sessions with students • Events with parents • School-wide events with students • School event for potential promise students • GEAR UP Events • Other, please specify	Number of strategies selected (0-8)
Meet with Parents	Do you meet with parents about Oklahoma's Promise scholarship program?	1—Yes 0—No

Note: Respondents could choose more than one role. Each role is coded as a separate dichotomous variable. For the respondents that indicated "Other" for the strategies question, we went through the data and added the strategies in the open-ended response to the count variable.

Table 3. Regression Results Predicting Uses of Discretion

	Model 1: Number of Strategies Used to Inform and Support Students	Model 2: Whether Counselor Meets with Parents
Role Perception		
Support Role	0.484**	0.163***
	(0.209)	(0.0615)
Compliance Role	-0.302	-0.0305
	(0.255)	(0.0702)
Information Dissemination Role	-0.0627	0.00748
	(0.250)	(0.0617)
Individual Characteristics		
White	-0.278	-0.0841*
	(0.384)	(0.0497)
Education	-0.284	0.0533
	(0.454)	(0.0901)
Conservative	-0.527**	0.0033
	(0.231)	(0.0599)
Republican	0.393	-0.0557
	(0.241)	(0.0597)
Counselor	-0.0283	0.241*
	(0.334)	(0.132)
Promise Knowledge	0.087	0.0128
	(0.079)	(0.0248)
Years in Position	0.001	0.0263
	(0.117)	(0.0331)
Perceived Support from Administration	0.957***	-0.0707
	(0.263)	(0.109)
High Discretion	0.073	-0.0521
	(0.218)	(0.0550)
% of Students Able to Meet With	0.002	0.000437
	(0.0040)	(0.00111)
% of Time Spent on College Preparation	-0.004	0.00193
	(0.005)	(0.00161)
School Level Characteristics		
School Family Income Comparison	0.115	-0.00131
	(0.112)	(0.0329)
Partner with Nonprofits	-0.204	-0.0368
	(0.303)	(0.0948)
Percent FRL Students	-0.118	0.132
	(0.568)	(0.168)
Constant	0.940	0.197
	(3.462)	(0.797)
Observations	168	168
R-squared	0.173	0.163

Robust standard errors in parentheses clustered at the school level; *** p<0.01, ** p<0.05, * p<0.1

Table 4. Regression Results Predicting Program Access

	Model 1: Percent of Total Enrollment Accessing Oklahoma's Promise	Model 2: Percent of Total Enrollment Accessing Oklahoma's Promise
Role Perception		
Support Role	0.0219***	0.0132
	(0.00680)	(0.0123)
Compliance Role	-0.0195***	-0.0319***
	(0.00744)	(0.0112)
Support*Compliance Role		0.0399**
		(0.0191)
Information Dissemination Role	-0.0598	-0.0009
	(0.238)	(0.0115)
Individual Characteristics		
White	-0.00254	-0.00284
	(0.00934)	(0.00928)
Education	-0.0121	-0.0151
	(0.0141)	(0.0140)
Conservative	0.00968	0.00970
	(0.00718)	(0.00692)
Republican	-0.0214**	-0.0210**
	(0.00855)	(0.00805)
Counselor	0.00829	0.0115
	(0.0109)	(0.0107)
Promise Knowledge	-0.00773*	-0.00781*
	(0.00433)	(0.00445)
Years in Position	0.00248	0.00230
	(0.00436)	(0.00429)
Perceived Support from Administration	0.00855	0.00790
	(0.00594)	(0.00573)
High Discretion	0.00157	5.62e-05
	(0.00724)	(0.00728)
% of Students Able to Meet With	0.000470***	0.000501***
	(0.000119)	(0.000111)
% of Time Spent on College Preparation	0.000137	0.000157
	(0.000200)	(0.000202)
School Level Characteristics		
School Family Income Comparison	-0.00841*	-0.00905*
	(0.00466)	(0.00472)
Partner with Nonprofits	-0.0185*	-0.0170*
	(0.00943)	(0.00952)
Percent FRL Students	0.0405	0.0426*
	(0.0257)	(0.0246)
Constant	0.188**	0.222**
	(0.0876)	(0.0864)
Observations	166	166
R-squared	0.249	0.265

Robust standard errors in parentheses clustered at the school level; *** p<0.01, ** p<0.05, * p<0.1

Table 5. Regression Results with Impoverished School Interaction

	Model 1: Percent of Total Enrollment Accessing Oklahoma's Promise
Role Perception	
Low Income School	-0.00519
	(0.0244)
Support Role	0.0223***
	(0.00741)
Compliance Role	-0.0201**
	(0.00795)
Support Role*Impoverished School	0.00467
	(0.0253)
Compliance Role*Impoverished School	0.00483
	(0.0243)
Information Dissemination Role	0.00154
	(0.00734)
Individual Characteristics	
White	0.00250
	(0.0107)
Education	0.00631
	(0.0111)
Conservative	0.00768
	(0.00848)
Republican	-0.0197**
	(0.00984)
Counselor	0.0139
	(0.0124)
Promise Knowledge	-0.00572
	(0.00397)
Years in Position	0.00337
	(0.00435)
Perceived Support from Administration	0.00984
	(0.00627)
High Discretion	0.00145
	(0.00761)
% of Students Able to Meet With	0.000352**
	(0.000149)
% of Time Spent on College Preparation	0.000143
	(0.000210)
School Level Characteristics	
School Family Income Comparison	-0.00235
	(0.00505)
Partner with Nonprofits	-0.0187**
	(0.00942)
Constant	0.0332
	(0.101)
Observations	171
R-squared	0.182

Impoverished schools are defined as those with greater than 75 percent of students on free and reduced-price lunch. Robust standard errors in parentheses clustered at the school level; *** $p<0.01$, ** $p<0.05$, * $p<0.1$

Appendix A. Eligibility Requirements for Oklahoma's Promise (2015)

Stage in Process	Eligibility Requirements
Middle/High School	1. Must submit the five-page Oklahoma's Promise application form by the deadline in 8th, 9th, or 10th grade. 2. Must submit income documentation (tax returns) by the specified deadline proving that the family makes below $50,000 a year at time of application. 3. Must agree to complete the 17-unit core curriculum. 4. Must make a 2.5 overall GPA. 5. Must make a 2.5 GPA in the core curriculum. 6. Must submit documentation proving that they are a U.S. citizen or lawfully present in the U.S. 7. Must attend school regularly. 8. Must do homework regularly. 9. Must refrain from substance abuse. 10. Must refrain from criminal or delinquent acts. 11. Must be certified by counselor that they met all of the academic and conduct requirements upon graduation from high school.
College	1. Must start college within 3 years of high school graduation 2. May not receive the award for more than five years (consecutive) or the completion of a baccalaureate degree. 3. Must maintain satisfactory academic progress in college. 4. Must submit income documentation every year while in college to prove family income is below $100,000 a year.

Appendix B: Representativeness of the Sample

To provide evidence on the representativeness of the high schools included in the sample of respondents, we present Table B1, which compares the descriptive characteristics of all schools in Oklahoma with those in the survey sample. First, the survey sample captures 134 unique high schools out of 382 total high schools in the state.

Table B1. Comparison of Sample of High Schools
with Population Across State

Variables	N Schools	Mean	SD	Min	Max
Statewide Population of High Schools					
Total Enrollment	466	388.96	552.89	21	3778
Percent Minority	466	0.44	0.186	0.048	0.996
Urban	466	0.14	0.342	0	1
FTE Teachers	460	24.09	28.59	0.59	194.5
Charter	466	0.03	0.165	0	1
Percent FRL	459	0.595	0.184	0.03	1
Survey Sample High Schools					
Total Enrollment	134	574.16	659.25	24	3489
Percent Minority	134	0.45	0.173	0.056	0.916
Urban	134	0.18	0.381	0	1
FTE Teachers	134	33.97	33.776	0	1
Charters	134	0.01	0.109	0	1
Percent FRL	134	0.553	0.175	0.071	0.985

The average high school in the state enrolled almost 400 students while the average high school in the survey sample enrolled over 550 students. Additionally, the average number of FTE teachers across the state is 24 whole in the sample the average is 34. These variables suggest that the sample slightly overrepresents larger schools. On the other characteristics, however, the survey sample matches the statewide population of high schools. For example, the average high school in Oklahoma enrolled 44 percent non-white and 59 percent FRL students and the sample of high schools enrolled 45 percent non-white and 55 percent FRL students.

We also provide a descriptive assessment of the variation in access across our interviewees below in Table B2.

Table B2. Comparison of Outcome Measures Across Interviewees

	1	2	3	4	5	6
Total Enrollment	2506	326	840	704	161	73
Percent FRL	37%	91%	45%	51%	68%	48%
Percent Promise	17%	5%	12%	8%	9%	11%

Appendix C: Breakdown of Role Perception Variables

Table C1. N for Each Combination of Roles

All Roles	47
Support Only	43
Compliance Only	23
Information Only	23
Support & Compliance	8
Support & Information	6
Compliance & Information	6
None	11

Appendix D. Measurement of Control Variables

The perceived support from school administration for the efforts by the SLB on behalf of students applying for the Promise program captures the first key determinant of street-level action—communication by administration. Next, we account for organizational implementation factors by including measures of the perceived level of discretion as well as whether the school has any partnerships with community organizations. These variables capture the variation in the delegation of discretion to the front-line as well as the variation across schools in the use of collaboration to increase capacity (Lynn, Heinrich, and Hill 2001). To account for the third element—values, knowledge, and attitudes of the SLB—we incorporate a measure of the SLB's familiarity with the eligibility requirements in the promise program, how long the SLB has been working at the school, political ideology and political party identification. Finally, we incorporate contextual factors by including measures of the perceived average family income at the school, the percentage of students that the SLB is able to meet with one-on-one, and the percentage of their time spent on student college preparation activities as a representation of workload.

Concept	Variable	Question Wording	Measurement
Communication by administration on prioritization	Support from Administration	Is your school administration supportive of your efforts on behalf of students applying for the Oklahoma's Promise program?	4 – Very much so 3 – Somewhat 2 – Not really 1 – Not at all
Organizational Implementation Factors	High Discretion	To what extent do you feel you have the authority and flexibility to strategize and make decisions in each of your roles? • High discretion: I make almost all decisions with regard to how I perform my role • Some discretion: I work in partnership with upper administration to determine how to best perform my role • No discretion: I perform my role based solely on instructions received from upper administration	1 – High discretion 0 – Some discretion; No discretion
Organizational Implementation Factors	Partner with Nonprofits	Does your school partner with any community organizations (such as churches or local non-profits) to help with college preparation?	1 – Yes 0 – No
Knowledge & Attitudes about Tasks	Promise Knowledge	On a scale from 0 to 10, where 0 means **_not at all confident_** and 10 means **_very confident_**, how confident are you in your knowledge of the eligibility requirements for the Oklahoma's Promise scholarship program?	10 – Very Confident 0 – Not at all Confident
Contextual Factors	School Family Income Comparison	When compared to other schools in your community, do you think the average income of families at your school is lower, higher, or about the same?	1 – Much higher 2 – Somewhat higher 3 – About the same 4 – Somewhat lower 5 – Much lower

Appendix E. Regression Results Predicting Uses of Discretion with Interaction

	Model 1: Number of Strategies Used to Inform and Support Students	Model 2: Whether Counselor Meets with Parents	Model 1: Number of Strategies Used to Inform and Support Students	Model 2: Whether Counselor Meets with Parents
Role Perception				
Support Role	0.484**	0.163***	0.717**	0.169**
	(0.209)	(0.0615)	(0.329)	(0.082)
Compliance Role	-0.302	-0.0305	-0.470	-0.0303
	(0.255)	(0.0702)	(0.497)	(0.112)
Support*Compliance Role			0.561	0.0164
			(0.383)	(0.104)
Information Dissemination Role	-0.0627	0.00748	0.147	0.0035
	(0.250)	(0.0617)	(0.263)	(0.0583)
Individual Characteristics				
White	-0.278	-0.0841*	-0.325	-0.106**
	(0.384)	(0.0497)	(0.348)	(0.0500)
Education	-0.284	0.0533	-0.208	0.0258
	(0.454)	(0.0901)	(0.386)	(0.0853)
Conservative	-0.527**	0.0033	-0.467**	0.0041
	(0.231)	(0.0599)	(0.229)	(0.0601)
Republican	0.393	-0.0557	0.328	-0.0528
	(0.241)	(0.0597)	(0.238)	(0.0601)
Counselor	-0.0283	0.241*	0.0171	0.225*
	(0.334)	(0.132)	(0.328)	(0.131)
Promise Knowledge	0.087	0.0128	0.0935	0.0145
	(0.079)	(0.0248)	(0.0754)	(0.0239)
Years in Position	0.001	0.0263	0.0351	0.0196
	(0.117)	(0.0331)	(0.115)	(0.0312)
Perceived Support from Administration	0.957***	-0.0707	1.004***	-0.0912
	(0.263)	(0.109)	(0.251)	(0.0997)
High Discretion	0.073	-0.0521	0.095	-0.051
	(0.218)	(0.0550)	(0.223)	(0.056)
% of Students Able to Meet With	0.002	0.000437	-0.00414	0.0019
	(0.0040)	(0.00111)	(0.00479)	(0.0016)
% of Time Spent on College Preparation	-0.004	0.00193	-0.00413	0.0019
	(0.005)	(0.00161)	(0.00499)	(0.0016)
School Level Characteristics				
School Family Income Comparison	0.115	-0.00131	0.110	-0.00799
	(0.112)	(0.0329)	(0.117)	(0.0319)
Partner with Nonprofits	-0.204	-0.0368	-0.0897	-0.0333
	(0.303)	(0.0948)	(0.321)	(0.0920)
Percent FRL Students	-0.118	0.132	-0.113	0.142
	(0.568)	(0.168)	(0.567)	(0.169)
Constant	0.940	0.197	0.0190	0.498
	(3.462)	(0.797)	(2.814)	(0.733)
Observations	168	168	168	168
R-squared	0.173	0.163	0.164	0.157

Robust standard errors in parentheses clustered at the school level; *** p<0.01, ** p<0.05, * p<0.1