

From Policy to Practice: Applying Street-Level Bureaucracy Theory to Engineering Education

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Introduction

As with workers in other domains, educators in higher education operate in a dense web of policies, expectations, and institutional requirements. Potentially unlike other domains, the connection between educator work and that dense web is not often the focus of scholarship. As a result, our understanding of how policies are actually implemented can be obscured, and the effect of this policy context stays unnoticed.

This paper addresses these challenges by introducing street-level bureaucracy (SLB) theory as a critical lens for understanding the lived experiences of educators as they interact with policy. The focus is on explaining the core ideas of SLB and highlighting how they play out in higher education. In addition, the paper puts these ideas in dialogue with an upcoming addition to the Americans with Disabilities Act (ADA) that will affect higher education and thus educators.

This work is partially motivated by the observation that existing frameworks in engineering education fail to fully explain the challenges and frustrations that educators encounter (Pope-Ruark, 2022). Frameworks rooted in teaching and learning theories provide only a partial view, leaving unaddressed the bureaucratic landscape that shapes educational practice and the work of decision making with such a landscape.

Street-level bureaucracy offers a means to address this bureaucracy dimension. At its core, the theory frames policy implementation as a site of active interpretation and negotiation by those responsible for their execution. In the context of higher education, this means understanding educators not as passive recipients of policy, but as active agents who exercise discretion within complex institutional constraints. By considering the different contexts of educators (the SLBs) and the different policies they are responsible for, it may be possible to better understand educator frustrations and imagine other ways forward.

This paper is intended for multiple audiences. First, in line with the above comments, we anticipate the paper being relevant to educators seeking to understand the underlying challenges of their professional environment. Second, it speaks to those involved in policy creation and policy monitoring, particularly within engineering education. In their work on educational change, Henderson and Beach identified “enacting policy” as one of four strategies being used to facilitate change in undergraduate STEM instructional practices, and a focus on SLB can help those change-makers interested in pursuing a policy route. Third, we imagine the paper and ideas presented as potentially useful to anyone interested in effective sharing of information with educators because the paper offers insight into the lived experience (and complexities) of being an educator.

The paper does not seek to prove street-level bureaucracy as a path to solving specific problems, but rather to raise awareness of its potential as an analytical tool. We aim to show how SLB theory can help to make visible an often-invisible work of educators, highlighting the

discretionary practices that shape institutional policy. As with other work on SLB, we aim to problematize simplistic understandings of policy implementation and recognize the work of street-level bureaucrats.

As we proceed, we invite readers to recognize the complexity of their own institutional environments, to appreciate the challenges faced by those implementing policies, and to see bureaucracy not as a constraint, but as a dynamic, human-driven process of institutional adaptation. We also recognize that many in engineering education may be suspicious about accounts related to bureaucracy. Thus, we suggest that readers may want to suspend preconceived notions about bureaucracy. The term often carries negative connotations such as a sense of a rigid, impersonal system of red tape. Instead, we invite a more nuanced understanding. Bureaucracy is not inherently bad or good, but a complex system through which individuals navigate challenging institutional landscapes.

In the next section we provide generalized background on SLB, and then turn to an explanation of the genre of this paper (a humanistic essay). We then dig in via three sections: a section that lays out some basic ideas of SLB, a section that maps how these basics connect to higher education, and finally a section that explores what may transpire when a new policy enters the landscape (i.e., new digital accessibility requirements that will become live in April of 2026¹).

Background

At its core, Michael Lipsky's concept of "street-level bureaucracy" describes how policies are implemented in practice. Lipsky centers our perspective on what we might consider the "human infrastructure" of policy (to use the term of Lee et al., 2006) – that is, the people such as teachers, police officers, social workers, and administrators, who implement policies. Lipsky offers the idea that "public policy is not best understood as made in legislatures or top-floor suites of high-ranking administrators. [...] To the mix of places where policies are made, one must add the crowded offices and daily encounters of street-level workers" (Lipsky 2010, p.xiii). Lipsky's examination explores how the world is not as cut and dry as policies may represent them to be, highlighting how street-level bureaucrats must fill in the gaps to navigate "conflicting demands from policy rules, their client's needs, their professional codes, and their own personal values" (Tummers et al. , 2015) alongside resource constraints like limited capacity, high caseloads, and inadequate resources. Lipsky emphasizes how these conflicting demands shape the discretion that street-level bureaucrats have in policy implementation: "the decisions of street-level bureaucrats, the routines they establish, and the devices they invent to cope with uncertainties and work pressures, effectively become the public policies they carry out" (Lipsky 2010, p.xiii). These decisions, routines, and devices help street-level bureaucrats simplify their tasks, but may cause their actions to diverge from both the official policy intentions and their own values.

Given that our paper is meant to explore the possible resonances between street-level bureaucracy theory and engineering education, a thorough review of the literature is beyond our

¹ This paper was submitted in January of 2026 and revised in early April of 2026. Originally, the ADA digital accessibility requirements were scheduled to "go live" on April 24, 2026 for larger government entities and the requirements **would** have been in place at the time of final submission of this paper (April 29, 2026). However, a new compliance deadline (a one year delay) was announced around April 20, 2026. Rather than rewrite the paper, the decision was made to keep the paper as it was originally written.

scope (and indeed would be a huge task given the breadth of impact of this theoretical perspective; Lipsky's book has more than 30,000 citations on Google scholar). Fortunately, a recent systematic literature review from the field of public administration provides a window into the breadth. We introduce the rich realm of street-level bureaucracy theory through this literature review to give a sense of what perspectives are available to further explore in engineering education if it is considered a useful framework for this scholarly community.

In their systematic literature review of street-level bureaucracy research in public administration, Chang and Brewer (2023) reviewed 214 papers that were published across 47 different journals between 1980 to 2019. Slightly more than half of the literature they examined focused on bureaucratic discretion as an outcome variable of their research investigation (137, 50.7%). The authors determined that other papers had more varied foci, with the next most frequent outcome variable being about street-level bureaucrats' behaviors and interaction styles (25, 9.3%). The authors note that this body of literature in public administration has diverged into two notable directions: one which tends to consider discretion as a deficit (which they note as a political science perspective), while the other considers discretion as an asset (which they note as a policy studies perspective).

Throughout their paper, Chang and Brewer (2023) acknowledge that both the asset and deficit oriented perspectives of street-level bureaucracy hold truth in different ways, as the use of discretion can cause both negative and positive consequences. They characterize the studies with a political science perspective as taking more of a top-down approach, as they view street-level bureaucracy through a lens of bureaucratic control and accountability through compliance-based mechanisms. On the other hand, they discuss the studies with a policy studies perspective as focusing more on the bottom-up realities of the policy process, considering the ways that street-level bureaucrats can correct policy failures and systemic shortcomings through their in-situ implementation of public policy. Ultimately, the authors discuss how street-level bureaucracy exists within a dense web of relationships between policies, clients, structures, and resources (or lack thereof). Our exploration of street-level bureaucracy in the implementation of ADA policy (further below) considers both how street-level bureaucrats can fail to achieve policy goals because of their conflicting demands and discretion, and how some of these accountability issues are due to the complex structures in which these street-level bureaucrats exist.

Approach

While empirical research is dominant in engineering education, there are other forms of scholarship. This paper is offered as a humanistic essay, and draws its inspiration on that genre from the work of two scholars who write primarily in the human-computer interaction space (Bardzell & Bardzell, 2016). In describing this form, Bardzell and Bardzell (2016) use the following phrases to capture goals and features of a humanistic essay in contrast to a scientific/empirical article:

- "...showcases the work of working out a mental knot as the writer seeks to understand what they themselves think about the topic"
- "...includes a unique structure, poetic/evocative titles"

- “...demands a thoughtful response, engagement, reflection—but not necessarily (or even likely) agreement.”
- “...discloses, rather than represses, the inquirer as a subject with a point of view.”

In line with these ideas and specifically the latter point of being clear about the presence of a point of view, here we share the origin story of the paper as it was written by the first author in the ASEE abstract submission:

“By April 2026, large government employers, including major state higher education institutions, must ensure all digital materials comply with accessibility standards. As I worked to develop strategic support for educators in my department navigating this mandate, I found myself searching for a theoretical framework to make sense of what I was observing. The challenge wasn't just technical—it was deeply human and organizational. Educators (faculty, pre-doctoral instructors, adjunct faculty, and part-time lecturers) operate under diverse employment contracts, exercise significant freedom to modify course materials, and can face practical constraints that make attending training workshops difficult, let alone finding time to implement what they've learned. Add to this the disciplinary differences in how courses are taught, and the implementation picture becomes remarkably complex.

Street-level bureaucracy theory emerged as surprisingly relevant to understanding these dynamics. After consulting with sociology colleagues who confirmed its reputable standing in policy research (even being used to support national conversations about research security), I turned to the engineering education literature expecting to find applications. Instead, a search of the PEER repository revealed no instances of this concept. Even Google Scholar showed minimal connections between street-level bureaucracy and engineering education. This absence felt significant.”

The rest of this paper follows from these goals and features described by Bardzell and Bardzell (2016). For example, our mental knot involved figuring out how SLB would connect to higher/engineering education and what could be learned, and our next sections are crafted to reflect the steps in our effort to work out that knot. We are writing with hope of a thoughtful response, but not necessarily agreement. In writing, we draw on our personal experience looking at our institution of higher education, the University of Washington. Our institution is a large, public R1 institution where one of us has worked for over 25 years (the first author) and one of us is seeing the institution through the perspective of someone who joined less than four years ago (the second author).

SLB Building Blocks

Thinking with a theory involves a kind of discipline – of identifying the core building blocks of the theory and then being able to think with those building blocks. These building blocks were present in the background section, but start to get diffuse when reading SLB literature. Thus, we wanted to start by creating a space where the core building blocks of SLB could be named, starting with the idea of policies. We suggest that much of SLB theory can be understood via the five ideas shown in Table 1.

Table 1. Building blocks within Street Level Bureaucracy

Policies	Policies, as statements about what is to be done or how it is to be done, are a recognizable part of a bureaucracy in that a bureaucracy is essentially a system of managing that involves some party articulating expectations and other parties responsible for implementing the expectations. While SLB doesn't attend to the ways these policies are created, it does attend to what happens once the policies are in place. An additional feature of policy is the idea that policies have ambiguities. In SLB, ambiguities are not flaws in the policy design, but rather inevitable. When a policy is crafted, its language inevitably leaves room for multiple readings, creating a landscape where implementation is never a straightforward, mechanical process.
Street level bureaucrats	Within SLB theory, the people who are responsible for implementing the policies are called the street level bureaucrats. While everyday language can portray "bureaucrats" in a negative light, with SLB theory, the street level bureaucrats are critical to achieving the vision behind the policy. An interesting feature of street level bureaucrats is their relative homogeneity or heterogeneity.
Resource limitations	Within SLB theory, the street level bureaucrats who implement policies are understood to work in situations defined by resource limitations. In other words, there is too much to do, not enough time, not enough money, etc. While the nature of the resource limitations can change depending on the context (a street level bureaucrat in an affluent urban environment would have different resource considerations than a street level bureaucrat in a disadvantaged rural environment), the existence of resource limitations is a foundational idea.
Specific Situations	Within SLB theory, the core work is to implement policies when engaged with specific situations. The situation could be with a client, with an event, with a purchase, etc. What is key is that the situation is specific, and thus needs to be aligned with the overall goals of the policy while acknowledging the resource limitations.
Discretion	Discretion is perhaps the most widely recognized concept in SLB theory. When the street level bureaucrat must implement a policy in specific situations with resource limitations, decisions need to be made and thus discretion emerges. Within SLB theory, discretion is not a problem. Instead, discretion is inevitable.

Extrapolating. These building blocks make it possible to think within the theory and explore issues such as the implication of patterns within discretion and the effect of specific kinds of resource constraints. For example, an observation in SLB theory is how patterns of discretion can come to seem, to clients, as the actual policy. This might be the case when an event, such as a repeated approach to handling a request that connects to a specific policy, can gradually become understood as the policy itself. Another kind of question centers around strategies street level bureaucrats can use to grapple with their resource constraints as they strive to implement a policy. For example, the strategy referred to as “creaming,” taken from the phrase “skim the

cream off the top,” reflects the possibility that a street level bureaucrat will look for the easiest cases for implementing a policy and avoid more complicated ones.

SLB Connections to Higher Education

In this section, we discuss how the SLB building blocks connect to the work of educators in higher education. We position these educators as street level bureaucrats because they must engage policy. To put the pieces together, we start with the street level bureaucrats and their resource limitations, and then explore the policies these educators as street level bureaucrats must engage. As mentioned in the approach section, the ideas in this section draw on our own understanding of the institution within which we operate (i.e., the University of Washington, specifically the Seattle campus).

Educators as street level bureaucrats AND resource limitations. In higher/engineering education, educators can be understood as street level bureaucrats because they are called upon to implement policies in their engagements with students (their clients). While it is common to equate educators with the term faculty, an interesting aspect of the educator role at our institution is the wide range of employment configurations educators can occupy. Table 2 shows a sampling of the employment configurations for educators at our institution, and an example of a resource constraint that comes with the specific configuration. From the perspective of the institution, educators are all expected to do the same street level bureaucracy work but they are getting different resources, different information, etc.

Table 2. Employment configurations for University of Washington educators as street level bureaucrats

Employment configuration	Example of a resource constraint
Tenure track faculty as SLB	Research (and eventually service) take time away from teaching
Teaching faculty as SLB	Heavier teaching load and thus more instances of discretion
Research faculty as SLB	Unusual circumstance; may fall through the cracks if few know they are teaching
Affiliate faculty as SLB	Sustained relationship with the system, but other responsibilities
Part-time temporary lecturer (PTTL) as SLB	Last minute contracts, Limited access to expertise, may have limited information
Graduate/doctoral students as SLB	Contracts are union mediated, so more time than PTTL, may not be on mailing lists
Others as SLB (research scientists, postdocs, ?)	Variations of all of the above

Policies. The range of policies that educators in engineering/higher education implement is illustrated in Figure 1. These policies come from the federal government, the state government, professions who have a say in certain kinds of education, the higher ed institution, the department, etc. These policies include FERPA and mandatory reporter policies from the federal

government, religious accommodation policies in the state of Washington, accreditation requirements for engineering, accommodating students on sports scholarships and honoring the meaning of incomplete grades at the institution level, and curricular expectations and staffing norms at the department level. The point of this listing is not to be complete but rather inspiration about how many policies each educator may be required (at least at some point) to navigate.

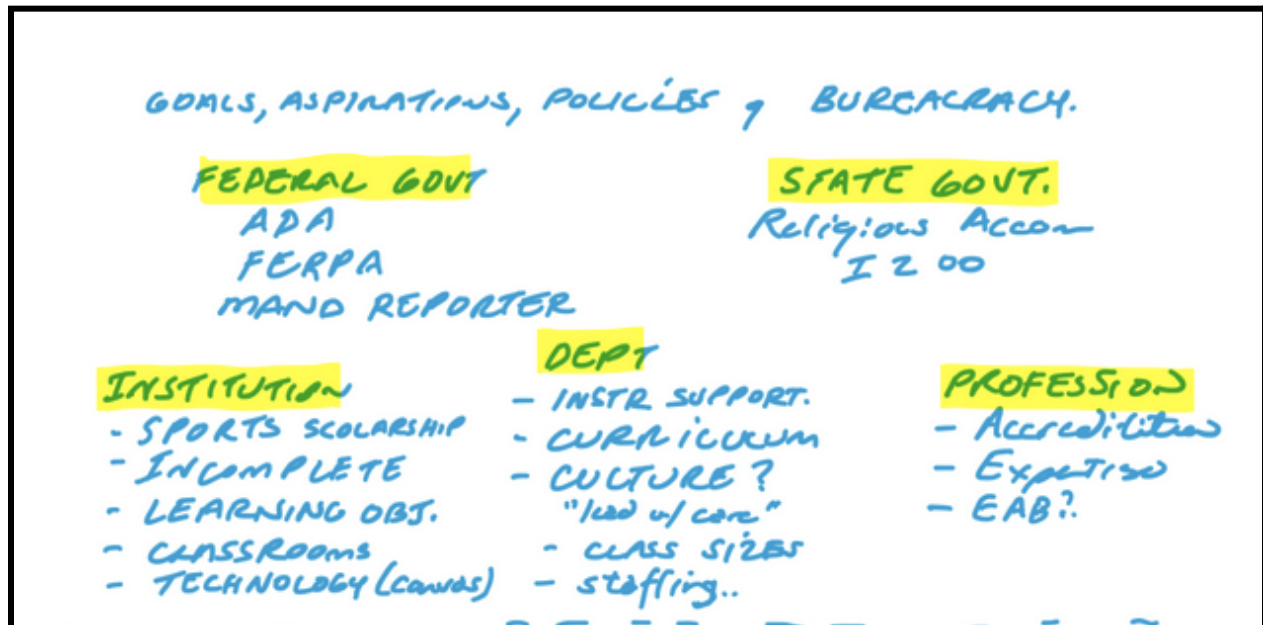


Figure 1. A sketch of the range of policies that SLB Educators implement

It is possible to observe the breadth in these policies. Along the same lines, it is possible to imagine they are difficult to appreciate in their entirety. Creation of this list, for example, did not involve looking at a website or a handbook but rather aggregating across different sources and over different conversations. Per SLB theory, another consideration is the kind of ambiguity inherent in the policies. For example, the question of what must be reported by a mandatory reporter would be a source of ambiguity. An additionally interesting note is this: in the higher education context, there is some variation in which educators are considered mandatory reporters (in our context, students who teach are not considered mandatory reporters).

Specific situations and discernment. Moving forward in our analysis, we can illustrate the kinds of situations that lie at the intersection of these policies and the educator aka street level bureaucrat. Consider a decision to let a student add a class; will this decision result in the violation of a policy about who has access to what classes? How does this change if the student is a student who does not yet have a major and the student is requesting access to a course required for a major? Consider a decision about how to convert student final performances in the class into a final grade; how might the use of ungrading (a novel grading technique that is growing in prominence) align with existing policy on grades? Consider a frustration with course level learning objectives that have been passed along; can they be changed? Consider a student requesting an incomplete, and realizing that the university registrar has policies on incompletes. The capacity to say yes or no involves discretion. And, in all of these cases, how do the resources (time, knowledge, confidence) available to the educator aka street level bureaucrat contribute to the decision.

Extrapolating. With these building block ideas illustrated, we can consider some of the additional directions. For example, we can consider how patterns in how a policy is implemented start to become synonymous with the policy, such as a broader policies around incompletes, academic misconduct, AI use, capstone team formation, or access to majors becoming, over time, replaced by more narrow interpretations based on how street level bureaucrats have exerted their discretion. We can also look to strategies by which educators as street level bureaucrats contend with the complexity of their policy landscape alongside their jobs. For example, when does choosing to not acknowledge a policy or choosing to be highly critical of a policy become a way to adapt? We can also explore issues of accountability. In higher education, where resources are collectively scarce, when might accountability be constrained because of an inability to “look over everyone’s shoulder” (aka, surveillance)? Finally, we can acknowledge tensions. For example, efforts to address policy awareness could be pursued but might lead to additional tensions such as the time to become knowledgeable about the policy alongside the amount of time (as a resource) that has been allocated to the teaching role altogether.

The point of this section has been to provide an illustrative accounting of SLB theory alongside educators in engineering/higher education and additionally draw attention to the lived experience of educators. It has also been to set the stage for thinking about the situation of the Spring 2026 ADA policy directive.

SLB Implications for Digital Accessibility Imperatives and the ADA Mandate

In April of 2026², certain educational institutions will be expected to comply with a policy that requires making educational materials digitally accessible. Below is a quote from one affected educational institution describing the situation to their community. Exploring the links in content like this quickly reveals a significant implication for higher education: educational materials are included in the scope of what needs to be accessible. Additional attention also reveals a staged introduction of the rule. Large institutions (populations over 50000) must comply by the data shown in the communication below; smaller institutions have one additional year (April, 2027).

The Department of Justice (DOJ) has issued a new digital accessibility rule under Title II of the Americans with Disabilities Act: Nondiscrimination on the Basis of Disability: Accessibility of Web Information and Services of State and Local Government Entities. This rule mandates that public universities ensure their digital tools, including internal and external websites and mobile applications, are accessible and meet the Web Content Accessibility Guidelines 2.1 AA standard. The University must comply with the rule by April 24, 2026. A DOJ fact sheet summarizing this new rule is available, and this webpage will be updated with more information as it becomes available. Source: University of Michigan (n.d.). New Department of Justice ADA Digital Accessibility Rule. <https://www.wisconsin.edu/digital-accessibility/new-department-of-justice-doj-ada-digital-accessibility-rule/>.

² As mentioned in the previous footnote, a one-year extension to the ADA Digital Accessibility deadline was announced the week of April 20, 2026. This text included in this paper was written prior to that extension. Rather than try to rewrite the paper to accommodate the change, the decision was made to keep the manuscript in its original format.

In this section, we treat this new “rule” as a policy and explore what is revealed by looking at it through the perspective of street level bureaucracy. To do this, we follow the same sequence at the previous analysis (i.e., educators as SLB with limited resources, the policy and its ambiguities, specific situations and discretion, and extrapolations).

Educators as street level bureaucrats – Vastly different resources. As highlighted in the previous section, the educators as street-level bureaucrats implementing this policy are not a homogenous group. They represent a diverse ecosystem: tenure-track faculty, teaching faculty, part-time lecturers, adjunct instructors, PhD student instructors, etc. Each brings different resources, knowledge, and institutional positioning to the accessibility challenge. This heterogeneity fundamentally shapes policy implementation. A tenured professor with extensive administrative support will approach digital accessibility differently from a PhD student teaching their first course or an adjunct juggling multiple institutional responsibilities. For example, the tenure professor may be able to use the summer to make educational materials accessible, while the adjunct educator may receive a set of materials very close to the start of the time and have little to no time to focus on remediation.

Policy – Ambiguities in what counts as an educational material. While the policy does focus on explaining what counts as having made something accessible, the policy does little to explain what counts as an educational material. Consider that PDF documents, web pages, images, videos, lectures, educational technologies, collaboration technologies, etc.—each presents unique accessibility challenges. Since choosing among these different materials is part of an educator’s job, each choice becomes connected to this new policy directive.

Specific situations and discernment – What is possible? Given the ambiguity in what counts as an educational material that must be made accessible, and the vastly different resources under which different educators as street level bureaucrats work, it should be expected that discretion (in the form of very different decisions) will be the result. An educator with a year to prepare and control the materials is quite likely to exert their discretion differently from a contingent educator whose contract was late and the previous educational materials arrived later.

This focus on the case of educators and ADA suggests an additional dimension: the nature of the course content and what it means about the educational materials. For example, an educator teaching a theory course (where materials might be primarily words) might handle accessibility differently than one teaching a visual design class (where materials might be primarily visual). In a theory class relying primarily on text-based journal articles, accessibility might seem straightforward. In contrast, a visual design course demands more nuanced approaches to making visual content accessible. Myriad other specific situations might be possible to imagine.

Extrapolating. Here we turn to the SLB issues of patterns (in discretion), strategies (to address resource constraints), and accountability. In observing the work in our university to attend to the ADA requirement, there seems to be a risk that the accessibility rule will result in certain patterns: “have headings” or “alt tag your images.” If these strategies are the ones chosen to make the work manageable, they represent a form of creaming (taking on the tasks that are the most likely to be considered success) and also may become the “rule” to those who look to the SLB level to understand.

Another consideration in the current context has to do with creaming on a different level – universities communicating with, providing support for, and having high expectations of those educators who, as a result of their employment configuration, are easier to reach. This can take the form of communicating with permanent faculty with offices before those in more contingent positions (see Figures 1 and 2).

The screenshot shows a web page with a purple header bar containing the text "ACADEMIC STRATEGY AND AFFAIRS" in white. Below the header, there is a breadcrumb trail: "Academic Strategy and Affairs / ADA course content liability and guidance – June 2025". The main heading is "ADA course content liability and guidance – June 2025" in a bold, dark blue font. Below this, it says "Vice Provost" and "Posted on June 4, 2025". The body of the email starts with "Dear Colleagues," followed by a paragraph explaining the need for updates on ADA compliance. It then lists four guiding principles for digital accessibility. The next section is titled "Faculty and student-centered approach" and describes a partnership model. The final section is titled "Clarifying faculty responsibility for digital accessibility" and states that the University, not individual faculty, is ultimately responsible for compliance. The page ends with a list of best practices for improving accessibility.

ACADEMIC STRATEGY AND AFFAIRS

Academic Strategy and Affairs / ADA course content liability and guidance – June 2025

ADA course content liability and guidance – June 2025

Vice Provost

Posted on June 4, 2025

Dear Colleagues,

I want to share some updates with UW instructors on progress we're making to support you in meeting the expectations of the Department of Justice [rule on digital accessibility](#) under Title II of the Americans with Disabilities Act (ADA). As many of you know, **this rule requires all University digital content – including course content – to be accessible starting on April 24, 2026.**

As we continue to strengthen our commitment to digital accessibility in course materials, I've heard concerns from instructors about this requirement: whether you will be expected to do the majority of this work on your own, what resources will be provided to help meet this requirement, whether it might inhibit student-centered teaching practices and whether individual instructors would be legally responsible if course content is found to be inaccessible. I want to take a moment to provide clarity and assurance on some of these concerns along with practical guidance on next steps as you prepare for autumn quarter and beyond.

Faculty and student-centered approach

As part of the [Digital Accessibility Initiative](#), a tri-campus Academic Course Content Action Team of faculty and staff subject matter experts have developed guiding principles for how the UW supports digital accessibility of course content – principles that resonate with UW values and with me, personally. They include:

- Taking steps toward compliance in the near-term, knowing we will continue to make improvements in the longer-term
- Minimizing burden by asking instructors to focus on less technical issues while providing central support for more complex issues
- Leveraging existing tools and services that support accessibility, and investing in scalable, long-term solutions as funding permits
- Finding solutions that support, rather than inhibit, student-centered teaching practices

This approach – which puts instructors in partnership with central services – will help us meet ADA expectations. Together, we can move from a reactive approach of fixing issues through remediation to proactively creating course materials that are accessible from the start.

Clarifying faculty responsibility for digital accessibility

I'd also like to take the opportunity to reassure instructors that while digital accessibility is a legal requirement, the University – not individual faculty – is ultimately responsible for ensuring compliance with the ADA rule. As faculty members, you play a critical role in helping the University meet accessibility standards by taking steps to create and deliver accessible course content and respond to disability accommodations. As you act in good faith by following University policy and guidance on meeting accessibility expectations, the University will stand behind you.

Acting in good faith includes making reasonable efforts to:

- Follow best practices and guidance from the Digital Accessibility Initiative on how to improve accessibility in your courses.

Figure 1. Screen shot of a University of Washington website page showing ADA requirement communication from June 2025.

The screenshot shows the University of Washington website. At the top, there is a purple header with the UW logo and navigation links for Students, Parents, and Faculty & Staff. Below the header, a blue banner contains a message about the HUB being closed on Jan. 12 due to a power outage. The main navigation bar includes links for HOME, SEEKING SUPPORT, MAKING A REPORT, RESOLUTION OPTIONS, PREVENTION & EDUCATION, POLICIES & GUIDANCE, and ABOUT US. The main content area features a large image of pink flowers with the text "CIVIL RIGHTS COMPLIANCE OFFICE" overlaid. Below this, a breadcrumb trail leads to the "Course Materials Checklist for Digital Accessibility AY 25-26" page. The page title is "Course Materials Checklist for Digital Accessibility AY 25-26". The content explains that starting Spring Quarter 2026, all active courses need to meet digital accessibility requirements issued by the Department of Justice. It provides instructions for instructors and academic personnel on how to prioritize their work. A sidebar on the right lists categories of digital accessibility content: Archived Web Content, Audio and Video, Individualized Conventional Electronic Documents, Preexisting Conventional Electronic Documents, Social Media Posts, and Third-Party Content. At the bottom of the sidebar, contact information for the ADA/504 Coordinator, Bree Callahan, is provided, including a phone number (206-543-9717) and an email address (ada504@uw.edu).

W UNIVERSITY of WASHINGTON

Students | Parents | Faculty & Staff

HUB closed Jan. 12 due to power outage
The UW's Husky Union Building (HUB) is closed today, Jan. 12, due to a power outage. No services are available at the building, and all Husky Den Food Court dining locations are closed. [More info](#) →

[HOME](#) [SEEKING SUPPORT](#) [MAKING A REPORT](#) [RESOLUTION OPTIONS](#) [PREVENTION & EDUCATION](#) [POLICIES & GUIDANCE](#) [ABOUT US](#)

CIVIL RIGHTS COMPLIANCE OFFICE

🏠 / [Policies & Guidance](#) / [ADA Guidance](#) / [Digital Accessibility](#) / Course Materials Checklist for Digital Accessibility AY 25-26

Course Materials Checklist for Digital Accessibility AY 25-26

Starting Spring Quarter 2026, all active courses need to [meet digital accessibility requirements](#) issued by the Department of Justice.

As instructors and academic personnel, you play a critical role in helping the University meet accessibility standards when you take steps to create and deliver accessible course content. The University will stand behind instructors and academic personnel who act in good faith by following policy and guidance on meeting accessibility expectations.

Below are expectations for course content materials and guidance on how to prioritize your work.

Expectations

1. Use [Canvas learning management system](#) and other approved, centrally supported tools like Panopto and Zoom.
2. **Select accessible readings materials**
 - Utilize [UW Library accessibility resources](#) and [subject librarians](#) to support your selection of course readings
 - Choose the latest version of textbooks
 - Shift to web (HTML) versions of assigned readings as much as possible
3. **Create accessible documents and presentation materials you produce** so content is accessible at the start.
 - [Syllabus, Assignments & Handouts](#) & [Slide Decks](#)
 - [Images & Diagrams](#)
 - [Videos and recorded lectures](#)
4. **Test your accessibility using Canvas accessibility checkers**
 - Aim for an Ally score of 80% or above for Spring 2026.
 - Practice with [centrally provided tools and accessibility checkers](#) throughout AY 2025-26 to build your skills and increase your scores
5. **Collaborate with central accessibility offices** [when issues are complex](#) or arise through the accommodation process.

Prioritization Guidance for AY25-26

If you teach multiple classes, you should start by updating classes that serve as a prerequisite, have often had a DRS student, or have high

Digital Accessibility

- Course Materials Checklist for Digital Accessibility AY 25-26
- Archived Web Content
- Audio and Video
- Individualized Conventional Electronic Documents
- Preexisting Conventional Electronic Documents
- Social Media Posts
- Third-Party Content

ADA/504 COORDINATOR

Bree Callahan

📞 206-543-9717 (voice and relay)

✉ ada504@uw.edu

Figure 2. Screen shot of a University of Washington website page showing a course materials checklist to be used during academic year 25-26.

The broader issue of accountability remains open. How will universities know if educational materials are digitally accessible? This brings up issues of surveillance. Also, the range of employment configurations mentioned earlier will make some levels of accountability difficult. These lurking threats around accountability may further complicate discretion as educators may choose to move materials to other platforms, or offline altogether, or change their pedagogy, if the work of aligning with the policy becomes too burdensome. Such actions are additional forms of discretion and would be good to study.

Going broader, critical questions emerge: How will universities support educators in being adequately trained? For example, a TA might be enlisted to help with accessibility efforts, but without proper training, their contribution becomes another layer of complexity. Also, the ADA digital accessibility mandate doesn't exist in isolation. It intersects with numerous other policies: religious accommodations, Title IX, FERPA. Each policy creates additional layers of bureaucratic complexity, making the street-level bureaucrat's job increasingly challenging.

Wrapping up, street-level bureaucracy theory offers ways to think about what will potentially happen come April 2026, specifically thinking in ways that take into account complexity and lived experience.

On the contributions of SLB Theory

This humanistic essay has focused on exploring what SLB theory might offer to those interested in advancing the state of engineering education. The exploration of SLB in engineering/higher education broadly supports awareness of messiness that educators grapple with but is often unacknowledged. The analysis hints at the volume and complexity of policies governing educational practice. From ADA requirements to Title IX, from mandatory reporting to religious accommodations, educators operate within a dense network of often-conflicting institutional expectations. Those interested in advancing engineering education must understand the complex institutional context in which educators operate. Adopting a Street-Level Bureaucracy (SLB) perspective can challenge idealized narratives, highlight pragmatic challenges, and potentially lead to new ways to support educators.

Our exploration of SLB in relation to the upcoming ADA digital accessibility requirement reveals potential implementation risks. For instance, the tendency to 'cream'—focusing only on the most manageable policy aspects—can create significant blind spots. In the case of our institution, targeting only tenure-track faculty for accessibility training ignores the critical role of TAs, adjunct instructors, and other educational workers. Moreover, the theory illuminates how resource constraints and institutional pressures can lead to unintended consequences. Educators might develop "willful ignorance" as a form of self-protection, creating potential compliance gaps.

While our initial steps are modest, we believe they demonstrate the significant potential of SLB theory in engineering education. In particular, we believe the theory's power lies in its ability to make visible the often-invisible work of educators. It validates the sophisticated adaptive strategies employed daily in institutional settings, challenging simplistic notions of policy compliance. By recognizing the heterogeneity of street-level bureaucrats—from tenure-track faculty to PhD students—we acknowledge the diverse ways institutional knowledge is created and maintained. Moreover, street-level bureaucracy theory provides a language for understanding institutional complexity. It reveals how limited resources, policy ambiguities, and specific situational contexts shape implementation. This perspective is not about criticizing institutional processes, but about developing deeper empathy and understanding for those navigating these challenging environments.

We think this warrants a consideration of next steps. A logical first step is a comprehensive review of existing literature on SLB theory, bringing together key scholarly perspectives. There is significant opportunity to further consider SLB theory exploring ideas of accountability (e.g., Hupe and Hill, 2007) and discretion (e.g., Evans and Harris, 2004), as well as articles that specifically discuss SLB dynamics within higher education (e.g., Alsharefeen, 2025; Bell and Smith, 2022; Lovell, 2024; Torres Carpio, 2024). Another next step might be to add to that body of literature through empirical scholarship bringing SLB alongside engineering education. Such scholarship could focus on the implementation of policies of specific relevance to engineering education (such as accreditation policies), how policy implementation is understood within the epistemology of engineering, and the extent to which SLB theory can help guide and shape new policy creation for engineering education. Another step might be to explore reasons why SLB has had such little presence in engineering education scholarship, despite the broad interest in change.

As engineering education continues to grapple with systemic challenges, street-level bureaucracy theory provides a powerful analytical approach to understanding institutional complexity. By centering the experiences of educators as active interpreters of policy, rather than passive implementers, the theory reveals the sophisticated adaptive strategies that drive real-world educational practice. This work advocates for a more nuanced, human-centered approach to understanding and designing educational policies and institutional frameworks.

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