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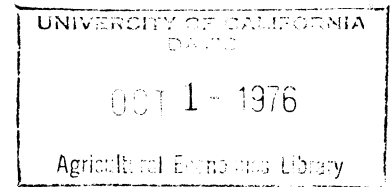
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ADMINISTRATIVE ASPECTS
OF FOOD PROGRAMS AS
RENEWABLE RESOURCES

A paper presented by
Rodney E. Leonard
Executive Director
Community Nutrition Institute
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The topic of my paper is administrative aspects of food programs, particularly the stamp program.

I do not view this as an invitation to say how the job could be done better, although it is a temptation. Nor do I see the topic as an opportunity to castigate Ed Hekman and his minions, even though I would do so with relish.

Instead, I want to describe an administrative concept for the food stamp program--and other food assistance programs--as an integral part of a consumer food policy. I will explore some of the philosophical concepts which guide food programs, discuss some of the techniques for monitoring and evaluating public service programs and suggest an approach to administering public services which is a little different from that now practiced by the USDA.

In short, I want to discuss program philosophy as it relates to monitoring and evaluation within the context of public service management, all to achieve sound program administration.

The food programs seem to be caught today in the web of conflicting policies, and I do not mean the debate over categorical aid versus income maintenance. On the one hand, an imperial Presidency and an imperial Congress created the food stamp program as the magnificent gesture of an enlightened elite. Benefits are provided for the poor, who abuse the program or show it disrespect only at the peril of their class. For example: An administration which could, with the stroke of the proverbial pen, cause 10 million people to suffer a diet less adequate today than yesterday, is simply an enlightened despot dressed up in Democracy's cloak. Yet, it nearly happened, and only a lawsuit stood in the way. A Congress which could propose a set of changes which would do much the same thing is just a crowd of Lady Bountifuls arguing that the Thanksgiving package is much too good for the poor folks. It is happening.

On the other hand, there are nearly 32 million Americans for whom the lack of an adequate income gets translated into an inadequate diet, which inevitably

leads to poor nutrition and poorer health and all the related problems. They are citizens who, like us all, live in communities which, over the past decade, have begun to employ various Federal programs to enable the community to better serve its residents. The food stamp program is one of those programs. It is a community service.

But food programs are more than a community service. They are a renewable resource. They are an act of God, as much as the flow of the river, the tree growing on the hill, or the birth of new life. They differ in that they are the result of an intellectual, or human process, while the others spring from a biological process.

As a renewable resource, these programs have meaning only in their use, in the capacity to contribute to the quality of life for the individual in the community. The value of the program exists in its application, not its creation.

If the food stamp program is a renewable resource, then the administrative focus of the executive agency changes drastically. The function of administration within the Imperial form is protective, not only of the program but also of the virtue and reputation of the Executive and Legislative branches. Criticism of abuses, and arguments over the ethics of using public funds to reduce hunger are implicit threats to the Executive and the Legislative branches. An effective bureaucrat, in this context, is one who knows how best to keep the Congressional committee and the White House happy, or at least to keep discontent at these levels at a minimum. The crucial point is that the administrative focus is on those who have an indirect interest in the program. Responses to these interests tend to cause administrative forms which hinder or restrict access to the program, a condition which is more harmful to the innocent user than to the program critics.

As a community resource, as a renewable community resource, the food stamp program requires a much different administrative process. The program administrator and staff are responsible to prevent or eliminate barriers to the program, to insure access by the community and its citizens. The administrator and the program staff perform a service function, rather than act as guardians of the Imperial dignity.

The legislative function, as a footnote observation, also shifts from a policing function to an evaluative role. The Congress would tend to assess the food stamp program in relation to a legislative emphasis on how best to insure the community is able to respond to the needs of all its citizens.

A crucial area for administration of a renewable resource program is the relationship between the Federal, State and local governments. Currently, administration tends to be a process for limiting responsibility rather than insuring performance. The general criticism of public service programs is not that they are unnecessary, but they are unavailable or inadequate. (More is being heard lately about limited resources, but that is an issue of choices rather than limits.)

The fact is that an Imperial administration emphasizes the need to protect one's rear instead of securing performance. If a program is authorized and funded, but doesn't reach many or most of those it is intended to serve, an Imperial administrator will try to avoid blame or criticism, or structure his or her role to minimize responsibility. For example, it has become clear over the last ten years that an essential function of program operation is to identify, locate and contact individuals who are eligible for food stamps; to explain the program and the process for establishing eligibility; and, to assist those who need help in finding their way through this bureaucratic maze to obtain food stamps.

Outreach is a primary administrative responsibility for public service delivery. It has been required by law since 1971. The Federal courts have ruled that service programs without an outreach component are incomplete. USDA, however, only requires that State governments submit a plan as to how they would conduct outreach. With minor changes, most of these plans were approved; and without great exception, none would provide the intensive outreach that is essential. But it took a Federal court order to require both the USDA and the State agencies to junk their "no-action" plans and to begin planning a process to insure performance.

What the USDA was willing to accept was to be able to say, if criticized, is "the States had responsibility for planning outreach, and didn't do what they said they were planning to do."

A plan is an agreement to perform, and not a treaty to limit responsibility. A Federal-State food stamp plan should specify where outreach is most needed, state the number of individuals who will be contacted through an outreach program, include a timetable of program milestones which should be met, describe the staffing requirements (including job descriptions), state the supervisory relationships (including in the milestones the number and frequency of program performance reviews) and list the cost of outreach projects by communities.

The Federal role in a renewable resource program is to assist States and local communities develop operational plans for service delivery; to help in the development and training of competent staff; to support and encourage community participation in the development of the plans; to monitor the implementation of the plan, and the operation of the program; and, to provide support and technical resources to help solve the problems identified through the monitoring and evaluation process. The Federal government, in addition, must act decisively to halt fraud and other criminal actions in relation to the program, and to maintain Federal standards where State or local authority chose to act contrary to the law.

Federal administration should emphasize these program administrative skills: planning, communications, monitoring, evaluation, community organizing, training, technical assistance, as well as regulation development, rule making, record keeping, public relations, personnel management and financial management. Federally sponsored training should be provided on a regular and continuing basis, and employment and promotion should be based on participation in the training.

The administrative focus should view the food stamp program not as a service flowing from the office of the President or a Congressperson, but as a service flowing to the individual as a community resident. In the development of program rules and procedures, a primary concern should be to assess the impact of a proposed rule or regulation on program access. If the impact analysis shows the likely result is to create a barrier to participation, then some other procedure to serve administrative needs should be found.

Similarly, the administrative view of evaluation should be as a process to identify areas where Federal assistance is needed, and can be offered. As program evaluation is often practiced currently, there is a tendency for evaluators to look upon themselves as investigators, as cops in plain clothes. Even if an evaluator thinks otherwise, experience has taught State and local program staff to look upon them as someone whose visit always is followed by trouble. Evaluation is one step in the process of helping improve performance, not in assessing whom to punish.

Evaluation should be carried out under explicit conditions. Everyone should know what practices and activities are being evaluated, and why. This is one of the basic arguments for as specific a State, or community plan as possible. If a plan is viable, then the evaluation should identify problem areas and probable causes which can be corrected.

In a program as large (nearly 18 million participants) and as extensive (every county in the U.S., and Puerto Rico) as Food Stamps, a major and continuing problem is fraud and errors. Both tend to be lumped together in the public eye as losses of public funds due to dishonesty, deceit and other skulduggery. There is probably some virtue to the generalization.

But the monitoring and the response to problems which surface in the evaluation are different for fraud than for error.

Fraud or dishonesty can be practiced by everyone--by the food stamp staff, by the business community involved in handling stamps and by the participant. Suppressing dishonesty requires both an acceptance by the community of the food stamp program (and thus peer pressure to stop abuses) as well as the normal skills of investigation, detection and arrest.

Fraud is a major problem in every public service program, and the effort put forth by the government to check and control fraud needs to be thorough and complete. It is one of those situations where public assurance of action is placed on the substance of procedure rather than on the reports of its effectiveness.

In the case of food stamps, for example, this would involve a five-stage Federal effort to build the capacity of State agencies to deal with fraud:

- Task 1. Evaluate the current state agency efforts through a literature search, and select five or more of the most effective State agencies for further study;
- Task 2. Develop surveys which will evaluate legislative and administrative practices on essential elements of fraud control and handling, such as staffing, procedures for investigating, administering, and restitution and for prosecution referral;
- Task 3. Using the survey instruments, information should be collected in the States from public assistance agencies, fraud investigative units and the State and District Attorney's offices;
- Task 4. The information would be compiled into a "Best Practices Report" for each State covering the administrative and policy relationships which have led to an efficient means of detecting, investigating and prosecuting food stamp fraud cases. These reports can be used in information programs, and in training and technical assistance efforts provided by the Federal government to State and community agencies;
- Task 5. A major product of the analysis of survey materials will be to develop a Federal Options Paper. This would identify possible changes in policy, in administrative procedures and in organization practices such as:
 - a. The system of accountability for investigating and reporting fraud;
 - b. Administrative and legal sanctions;

- c. Procedures for handling those who defraud the program;
- d. Range of corrective actions available;
- e. Legal remedies.

The actual distinction between error and fraud, while important in efforts to investigate and prosecute recipient fraud, does not significantly change the methods for error detection. In other words, most corrective actions taken in the determination and retermination processes will reduce both error and fraud. The essential function, once an error is determined, is to distinguish if it is a fraud, or if it is an error, and to take an appropriate action.

Errors are predominantly a staff problem, although participant error also exists. Errors work both ways. Some cause the Federal government to pay more in benefits than an individual is entitled to receive, and some cause individuals to receive less than they should. In one case the public is defrauded, and the individual citizen is defrauded in the other.

However, where the problem is human error, program administration will have to rely primarily on administrative as opposed to judicial procedures to minimize the problem. That is, the task is to improve staff skills to overcome institutional weaknesses.

This defines more explicitly the administrative, or managerial problem. It is possible to educate individuals to fill certain staff functions, but education in no way trains the individual for the institutional role and the institutional problems. The food stamp program is an institutional mechanism, operating within the Federal system of government, to insure the delivery of a renewable resource to the individual citizen in the community where he or she and their family resides.

The administrative resource needed to overcome institutional weaknesses, such as staff or other human error, is training and technical assistance. T/TA is a crucial instrument for building institutional capability. It not only communicates the necessary skills to overcome an operational problem, but also explains the

various individual functions and skills within the context of the program and its purposes. It relates--or should relate--what one person at the Federal level is doing to what another at the State level is doing, and what both are doing in relation to the certification worker in the community program. Training and technical assistance is not a function which universities or colleges perform well, or easily, although it is a service in which they profess competency. Although there are several reasons, the basic problem is that T/TA is ineffective in an academic form. A person can learn the principles of good program management, for example, but the institutional problems which occur because of bad management will go unchecked unless principles are demonstrated and used as organizationally specific practices applied to organizational, or program goals.

The basic value of T/TA is in its application as a problem solving technique by program managers and administrators within a uniform program standard. That is, T/TA is a continuous and on-going activity to be used by administrators to communicate the value and purpose of the program, an awareness of problems and their desire and intent to solve them.

One of the spin-off values of T/TA is to provide a basis for evaluating individual performances, and for determining the allocation of rewards, such as in-grade pay increases and promotions. There are other virtues, and some real potential problems with T/TA as an institutional support mechanism, but that is the topic for another paper.

My purpose here is to present a new administrative concept, to discuss how it might affect the conventional administrative approach and to examine some of its features.

Food stamps are a renewable resource program. It serves a consumer function--i.e., it must be viewed as a resource coming toward the individual, not away from the producer; or, in this instance, the imperial form of government.

The imperial Presidency ended in 1968, although the ghost did not depart until August, 1974, after all the President's men had gone. The imperial bureaucracy is still with us, although that is about to change.

When it does, there will not be less government; the imperial presidency is gone, but the Executive and its institution, continues.

The bureaucracy will remain, as will its purpose; but its function will be different, as will its perception of the bureaucracy.

There will be a new procedural emphasis on planning, on citizen participation, on monitoring and evaluation, on training and technical assistance as part of the substance of service delivery.

An, I hope, on the quality of life for the consumer, poor and rich.