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# MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Public Health Service

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TO : Mr. Eugene Rubel  
Director, Comprehensive Health Planning

DATE: July 26, 1974

Rubel

2516 info

FROM : Regional Health Administrator  
Public Health Service, Region I

SUBJECT: Comments on Proposed Tasks for Implementing HRP Legislation

Members of the Regional Office staff have reviewed the work plan material distributed at the recent CHP Meeting in Rockville. We have identified a number of concerns that are implicit in the subject documents, which, in my opinion, require intensive exploration and discussion at the Regional Health Administrator level.

These concerns fall into the following categories:

1. The lack of real Regional Office participation in most of the key activities indicates an apparent change of philosophy in relation to the whole HEW concept of decentralization.
2. The Work Plan does not appear to take into consideration the potential impact on MBO activities already developed by the Regional Offices and the major adjustments that will be required to facilitate any Regional Office role in the proposed Work Plan. In addition, the Work Plan activities are not necessarily consistent with priorities that have been developed under MBO for each Regional Office.
3. The issue of "delegation of authority" and its relationship to decentralization should be explored in great detail as it has in my opinion a strong bearing on the different roles to be assumed by Central Office and Regional Office staff.

The following references are offered as comments on specific items in the Work Plan document:

#### ADMINISTRATIVE MATTERS

Task 1 -- Our concern in regard to budget development, staff requirements, etc. was expressed in a memorandum from Dr. William J. Beck, Director, Division of Resource Development, to Mr. Kelly, Comprehensive Health Planning Service, Rockville, Maryland, dated July 23, 1974.

Task 2 - Those subsections of this task that identify joint CO/RO efforts need considerable interpretation and clarification. I am particularly concerned that Item C calls for no Regional Office role in the development of alternative organizational structures. Item E does not address itself to the need for input from Audit Agencies (GAO/HEW). Recent audits by these groups indicate dissatisfaction with the lack of specific forms and process to denote accountability. In addition, the role of General Services Administration under A-102 is not taken into consideration. I was also concerned that there is no expressed role for the Regional Office in the development and participation of an overall program guide (Item F).

#### DESIGNATION OF GEOGRAPHIC AREAS

An overriding issue in the designation of geographical areas is the role and responsibility to be assumed by Central Office, the Office of the Regional Director and the Office of the Regional Health Administrator. This is of particular concern when you consider the fact that the Governor's Office in each State will have a major role in determining geographical boundaries for HSA's within the State.

Task 2 of this section calls for the preparation of materials for training sessions. No Regional Office input is identified and I feel that the Regional Office should play a very positive role in the development of this material. Task 4, Delegation of Authority, calls for "discussions and decisions" under Regional Office role. This is vague and needs to be clarified. Assuming that funding authority will rest with the Regional Health Administrators the extent of this delegation of authority must be thoroughly explored.

Item VII - Training Sessions - calls for Regional Office to be participants. It is crucial that the Regional Offices have input into the development of proposed training sessions.

Item VIII - Technical Assistance to individual states is identified as a joint Central Office/Regional Office effort. In this area I believe it is necessary to spell out who will assume specific responsibilities and in what areas. In addition, I question why this would be any different than the 1122 process initiated last year. The Regional Office assumed the responsibility for technical assistance to individual states with input from Central Office as necessary.

Item IX - Action of Waivers related to the whole issue of delegation of authority, approval authority, and funding authority. Any decision on this particular task would be directly related to the decisions on these other items.

Item X - Action on Governor's Designation has to be spelled out more clearly from the point of view of concerns identified in Item IX.

#### TOTAL MANAGEMENT MONITORING SYSTEM

In reviewing this section many questions can be raised in terms of relationship of the proposed Monitoring System involving substantial input and personnel requirements from Central Office, Regional Office and outside consultants. What is the relationship of this system to other systems being planned or in operation within Public Health Service? How does the proposed system relate to Agency Program Reporting System (APRS)?

#### AGENCY SELECTION

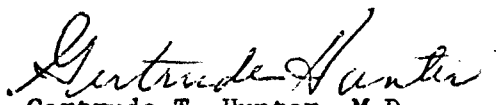
This entire section and each of the tasks identified is in need of extensive discussion in order to specifically clarify the roles of Central Office and Regional Office staff in this critical area. The specific role for each unit will be directly related to the determinations made on several points raised above.

#### REGULATORY ACTIVITIES

The same issue of clarification as a Regional Office role comes up once again in the areas of regulatory activities. It is apparent from the document that the vast majority of this activity related to review and comment and does not identify any substantive role that related to the decision-making responsibility of the Regional Office in regard to regulatory activities

The above constitutes an overall review and highlights some of my major concerns. It is apparent that the basic issue relating to these activities must be explored in great detail in order to successfully achieve the implementation of the proposed legislation.

I would be pleased to assist in any way possible in resolving these issues.

  
Gertrude T. Hunter, M.D.  
Regional Health Administrator