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My name is Beryl A. Radin and I am a Scholar in Residence in the Department of Public Administration and Policy of American University's School of Public Affairs and an elected fellow of the National Academy of Public Administration.

For many years I have been studying the efforts within the federal government to use reorganization as a way to improve the delivery of federally supported services. Along with my co-author, Joshua Chanin, I recently published a book entitled *Federal Government Reorganization: A Policy and Management Perspective.* It is a reader that brings together a range of views on federal reorganization both through general perspectives as well as specific reorganization examples, including the Department of Homeland Security, the Department of Defense, the Department of Education and proposals to establish a Department of Food Safety.

My interest in this important issue, thus, is not focused on the specifics of the current proposals to move the Forest Service into the Department of Interior to operate closely with the Bureau of Land Management. Rather I will attempt to raise a number of issues that seem to have had an impact on other reorganizations and thus I believe should be considered in this proposal.

While reorganization is an important tool that can be used in many situations, there are very different ways of thinking about this strategy. Much of the literature on this topic draws on what I call the "management" perspective. It borrows experience from the private sector; it emphasizes the authority of the President to make change as well as what are viewed as logical arrangements of organizational components to improve efficiency. An alternative way of conceptualizing the topic is what I call the "policy" approach. It considers the context and environment surrounding programs and emphasizes the role of Congress, constituencies and interest groups, and distinct cultures of programs. It sometimes employs reorganization not to change substantive outcomes but as a symbolic response to demands for change. While efficiency continues to be an essential value, it has to be considered along with issues of effectiveness and equity.

I believe that both perspectives are important but much of the traditional literature on reorganization emphasizes the "management" perspective and often ignores the

"policy" perspective. My testimony will focus on the "policy" perspective because I have found that most public management advice tends to downplay it.

Here are my six points:

1) Reorganization efforts generate two different sets of problems: some are short term and others are long term. Opponents of reorganization often focus on short term disruptions and problems and not on potential long term gains. Supporters focus on potential long term gains and tend to ignore short term disruptions. If short term problems are severe, that may serve to block any long term gains or color any future activities.

2) Reorganization rarely shifts political players. If the political system has separate paths for dealing with programs, that usually continues. This includes separate congressional jurisdiction issues, separate constituencies, and distinct (and often competitive) interest groups. If the programs involve implementation in different settings, these differences may be especially important.

3) At first glance, programs may appear more compatible with one another than they actually are. The level of similarity between programs may be more superficial than technical. They may be embedded in different professional and technical cultures and when merged, one of the cultures prevails. Yet all approaches are legitimate at different points.

4) Changing organizational structure is not always an effective way of dealing with conflict between agencies. It may simply displace the conflict to another setting. Shifting organizational boxes may be more symbolic than real.

5) There are alternative ways of addressing overlap and interdependency between programs. Increasingly organizations have sought to devise networking, collaboration and joint projects as a way of minimizing conflicts. This is a time consuming strategy but is often more acceptable to those within the system.

6) Changing technology, globalization, crises, and other shifts in the policy environment may bring new players to the table that make the dimensions of a reorganization out of date. This may generate a belief that there will be constant reorganization. That form of organizational turbulence does not allow the agency to develop a coherent program.

All of this is to say that reorganization is not always the panacea that is often suggested by its proponents. At the same time, this is not an argument against all uses of the reorganization tool. However, I have suggested that those considering reorganization should take into account the following elements before coming to a decision:

1. What is the location of the reorganization?
2. Have there been previous reorganizations that may affect this situation?
3. What events, issues and dynamics stimulated an interest in moving to a reorganization effort?
4. Are there developments within the environment or context of the agency that pushed a proposal?
5. What are the goals of the effort?   Do they appear to be policy, political or administrative issues?
6. Did the ideas behind the reorganization emerge from a commission, a study group, an interest group or some other actor?
7. What was the legal framework and/or authority available to the relevant decisionmakers?
8. What process was used to develop the proposal?   Who participated in such a development?
9. Who actually has the ability to decide on the reorganization?   Who influenced those decisionmakers?
10. What influenced the proposal's scope or timing?
11.   Did the development process and/or the decisionmaking process consider the following issues:
     - Resistance to the idea from staff
     - Resistance to the idea from members of Congress
     - Resistance to the idea from external interest groups
     - The aspects of the culture of the organization that supports or opposes the idea
     - Costs of disruption
     - Laws or regulation required to implement the decision
     - Impact on budget
     - Impact on personnel
     - Space or other resources required
12. Does the process include a discussion of criteria for evaluating the reorganization?
13. Has there been any consideration of future changes that might be required?
14. Is it possible to develop a calculus indicating supporters, opponents and neutral players in the process?
15. Are there alternative approaches to structural change that might address the situation?

Thank you for inviting me to testify before this Subcommittee; I am available to work with the Subcommittee and its staff to continue this conversation.