

PAPERWORK AND THE OLDER AMERI-
CANS ACT: PROBLEMS OF IMPLEMENT-
ING ACCOUNTABILITY

STAFF INFORMATION PAPER

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Prepared by C. L. Estes, Ph. D., and Maureen Noble, M.S.W.

P R E F A C E

“Paperwork” has become a national concern. Business and Government employees complain of excessive and needless reports, forms, and checklists. Citizens complain of redtape, errors, and frustration and anger when they deal with Government programs meant to serve them. So pervasive is the problem that Congress created a special Commission on Federal Paperwork in 1974 to explore ways to control it.

Knowing that the complexities of some Federal programs posed special problems for many older Americans, the Senate Special Committee on Aging took special interest in the work of the Commission. The committee was pleased when the Commission decided to place a special emphasis on the effects of paperwork on older Americans.

A number of Commission findings confirmed earlier information presented to the committee by many older Americans and agency personnel administering services for the elderly:

- Increasing medicare paperwork requirements, in part, have caused more and more physicians to elect not to bill medicare intermediaries for services provided to patients, billing patients directly instead. The lengthy and confusing medicare claims process, then, must be faced by more and more older Americans, resulting in anxiety, frustration, loss of benefits, and higher out-of-pocket expenses for medical care.
- Older participants in medicaid and food stamp programs are subject to even more burdensome redtape as they are usually required to complete multiple, duplicative application forms every 6 months. The committee has received a number of reports of valuable benefits lost because of a misunderstanding of these requirements or an unwillingness to go through what is seen as a demeaning process.
- The Commission on Federal Paperwork found that the eligibility determination process in the title XX social services program resulted in many delays for service recipients. In addition, the Committee on Aging has received reports that the complicated reporting and recordkeeping requirements of title XX programs have kept providers of services from participating in title XX programs. This appears to be particularly true of smaller programs in rural areas—programs which are more often underfunded and could benefit most from title XX assistance.
- Procedures for filing Federal income tax forms are unnecessarily complex and pose problems for many Americans. The Committee on Aging recently conducted a hearing on tax equity for older Americans, and found that tax forms are especially troublesome for older Americans, many of whom lose special benefits and credits provided by Congress.

—The Commission on Federal Paperwork also found that the paperwork generated by the Employee Retirement Income and Security Act, passed by Congress to protect employee benefits in voluntary pension and profit-sharing plans, had an unintended side effect of encouraging employers to terminate their plans. Many had found that the extra paperwork and reporting requirements did not justify their participation.

The Committee on Aging has continued its interest in this phenomenon of increasing paperwork and administrative requirements in programs serving older Americans, and felt that an in-depth look at the Older Americans Act—a major source of Federal support for services to older Americans—could yield insights into these programs, as well.

The result is this report—prepared for the committee by Carroll Estes, Ph. D., associate professor, Department of Social and Behavioral Sciences, University of California at San Francisco, and Maureen Noble, M.S.W., professional staff associate. Dr. Estes' thorough familiarity with the Older Americans Act—its history, its implementation, and its mechanics—has served the committee well.

Not only have Dr. Estes and her colleagues documented the paperwork required of the network of State and area agencies on aging created by the Older Americans Act, they have done an excellent job in analyzing its causes and making recommendations for change.

This report is also valuable because it expertly analyzes the structure of the aging network created by the act, pointing out the difficulties in evaluation and documentation of experience in such a decentralized, but interrelated, service structure.

The network largely comprises 56 State and territorial offices on aging and almost 600 area agencies on aging created under title III of the act. State offices on aging are responsible for statewide planning, coordination, and pooling of resources for services for older Americans and administer State grants for services received through the Administration on Aging—the Federal level agency administering the act. In addition, State offices on aging are often responsible for administration of other Federal and State funds which support services for the elderly.

Area agencies on aging perform similar functions in their sub-State geographical areas. They, in turn, administer the act's direct service grants within their districts for individual contracting service providers.

In addition, title VII of the Older Americans Act has fostered the development of more than 1,000 nutrition projects providing congregate meals and opportunities for socialization for almost 3 million older Americans.

A major emphasis has been a focus on building from the ground up in planning and developing services for the elderly. Local area agencies on aging (AAA's) have the responsibility of determining and documenting local needs of older Americans and, through a complicated planning process, developing area plans for meeting these needs. In the development of annual area plans, AAA's also have a unique mandate to fill gaps in services through an involved process of coordination of all other Federal, State, and local public and private efforts in behalf of the elderly—rather than through direct provision of services themselves (unless there is no other

resource available for a needed service). AAA's also work to encourage the pooling of other Federal resources into a common stream of services for the elderly.

This report focuses primarily on the administrative requirements faced by these State and area agencies on aging in fulfilling their mandates under the act. As congressional action on extension of the act draws closer, this timely report clearly documents administrative and reporting duties which appear to be in need of adjustment in order to make the act more sensitive to the needs and limitations of those who administer it.

Dr. Estes reports, for example, that agency staff estimate more than one-third of their time is spent maintaining the reporting systems and handling information—time that cannot be spent in pursuing the goals and activities of the programs they administer. A companion study conducted for the committee by Raymond M. Steinberg, of the Social Policy Laboratory, Andrus Gerontology Center, University of Southern California, Los Angeles, generally confirms this concern. Reactions from a number of AAA's to a draft report prepared for the committee by Mr. Steinberg suggest that perhaps as much as 15 to 25 percent of required paperwork could be realistically cut without affecting communications or accountability.¹

The report also offers solid criticism and insights into the actual utility of the information flowing through this system. Suggestions are offered for future actions which can be taken to streamline information needs and strengthen evaluation of program effectiveness.

Ironically, Dr. Estes has found that the information gathered and reported up through the network is not always accurate. In fact, it is sometimes made up just in order to comply with data requests.

The report also concludes that actual performance information—information which would provide good indicators of how well the programs under the act are meeting the intended outcomes—is usually not available within the current reporting system. Nor is the reporting system entirely appropriate and useful for policy decisions, or lend itself readily to evaluating the effects of the programs funded under the act.

In this sense, the report is also timely in that it explores the broad implications of program evaluation required under pending sunset legislation.

This examination of the administrative and information-flow structure of the act's administering agencies raises questions and challenges to the further development of coordinated services for all older Americans:

—How can the real impact of broad Federal legislative mandates for planning and coordination of services be effectively evaluated?

An emphasis on planning and coordinating agencies is not unique to the Older Americans Act and its network of State and area agencies on aging. The experience of this strategy, therefore, could have important implications for other social and health service strategies now taking shape.

¹ The most common paperwork problems cited by area agencies on aging, both large and small, were demands associated with developing yearly area plans. The paperwork problems generated by this 1-year cycle have been acknowledged in major bills to reauthorize the Older Americans Act: S. 2369, introduced by Senator Frank Church, and others, provides for a 2-year planning cycle, as does S. 2850, introduced by Senator Thomas Eagleton, and others. S. 2609, introduced by Senator Pete Domenici, and others, provides for a 3-year planning cycle and requires the Administration on Aging to evaluate the impact of new paperwork demands on State and area agencies on aging. H.R. 12255, introduced by Representatives John Brademas, and others, passed by the House of Representatives on May 15, 1978, provides for a 3-year planning cycle.

- Does decentralization of responsibility for planning and service delivery require more or less paperwork and administrative detail than a centralized approach?
- How can we achieve a reduction of administrative siphoning off of valuable and scarce program funds without a loss of needed accountability and evaluation? How can we preserve and build upon the flexibility in the act without creating an unwieldy administrative structure?
- How can the Congress do its part in helping to more firmly shape this process? The authors of this report suggest that both Congress and the Administration on Aging make a sharper delineation of information needs; and that Congress include specific expectations in the form of goals to be met in future legislative modifications of the act.

The committee is indebted to the authors of this report for presenting these challenges, which are hereby transmitted to all Members of Congress, to all participants in the aging network, and—most particularly—the older Americans they are meant to serve.

FRANK CHURCH,
Chairman.

PETE V. DOMENICI,
Ranking Minority Member.

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Carroll Cox Estes and Lenore Gerard deserve special credit and gratitude for extensive editorial assistance in the organization and preparation of this report.

Finally, Buzz Martin, administrative assistant, contributed in all phases of the manuscript preparation and typing for which we are most appreciative.

C. L. ESTES.
MAUREEN NOBLE.

ABOUT THIS REPORT

General goals: This report, developed in line with the general objectives of the Commission on Federal Paperwork's Health Program Study Charter, will "identify information demands which are unnecessary, duplicative, or made in a manner which is costly and disruptive." Consonant with the three main goals outlined in the Commission on Federal Paperwork's Health Program Study, this report on "Paperwork and the Older Americans Act" seeks to:

(1) Collect specific information on the extent and nature of Federal data demands and the uses to which the data are put.

(2) Identify specific areas wherein a realistic potential exists for modifying the data collection process to reduce paperwork burdens while recognizing legitimate Federal needs.

(3) Develop recommendations for streamlining paperwork in problem areas identified in No. 2 above.

Definitions: "Paperwork" is defined in this report as surveys, instructional issuances, forms, reports, records, plans, and other documents generated or required at the Federal, State, and local level in the implementation of Older Americans Act programs. While paperwork is a normal and necessary part of organizational and program management, paperwork of all kinds uses up staff time and effort. It is imperative that consideration of paperwork problems and solutions be made in full recognition of the legitimate governmental concern for the dual objectives of mandated achievement and accountability. Priorities regarding the allocation of resources to "paperwork" must be based on the actual utility of the information sought and the potential economies of alternative data and systems of accountability, with a view toward doing without when the information is costly, and its utility questionable.

The basic question: The basic question in the paperwork problem is one of economics. When do the costs entailed in collecting, sorting, storing, and analyzing data outstrip its actual usefulness and importance? The answer is difficult for two reasons. First, information is intrinsically interesting to program managers because it appears concrete; it may be useful for public relations, politically expedient to have on hand, needed for program planning, and potentially useful in evaluating the impact of services both from the perspective of efficiency and effectiveness. Second, since it is not always clear what specific pieces of information are going to be needed in the future, a policy of broad information development acts as an insurance policy. Often, even in the short run, administrators do not know in advance the range, types, or quality of information needed to make policy, program, and budgeting decisions.

This unique and puzzling problem is made critical by our increasing use of modern copiers and computers. Our fascination with data, our ability to produce and disseminate large amounts of data, and our

insistence on credible, reliable, quantifiable data for decisionmaking has made us "information addicts."

Data sources: A series of 20 interviews were conducted with staff members working in Older Americans Act agencies at the State, area, and subarea level, including title VII projects and title III direct service projects. Most of the agency staff interviewed were drawn from one large State.¹ Details on the volume of information, direction of flow, and content analysis were developed from a close and systematic review of the identified major documents required of and by the Older Americans Act agencies. The primary focus was to ferret out the systems of documentation necessary to meet the most basic paperwork requirements.

New legislation: As noted in the preface to this report, legislation now before the Congress would require a study of paperwork requirements under the Older Americans Act. This report, which helped to prompt development and introduction of that provision, can be regarded as a guide to future action. In addition, legislation in both Houses would extend the period for development of State and area plans from 1 to 2 years in the Senate and 3 years in the House.² At first glance, such action might appear to reduce the need for attention to issues raised in this report. But the authors feel that, on the contrary, the evidence and conclusions presented here have even more urgency and relevance. The inappropriate requirements of the past stand in even greater need of attention. It is our hope and belief that this publication serves as one source of direction and information toward that end.

¹ OAA agency staff interviewed for this report are referred to as "Respondents" in parts 2 and 3. Staff of the California State Department on Aging and delegate agencies in the State were the primary respondents. See part 1 for additional information about methodology.

² See footnote on p. v for discussion of this legislation.

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PAPERWORK AND THE OLDER AMERICANS ACT: PROBLEMS OF IMPLEMENTING ACCOUNTABILITY

Prepared by C. L. Estes, Ph. D., and Maureen Noble, M.S.W.*

Part 1 FINDINGS AND RECOMMENDATIONS ON PAPER- WORK AND THE OLDER AMERICANS ACT

If not paperwork, what?

How, after all, can a program be evaluated unless there is a written record of its activities?

How can funds be granted without written material from applicants?

How can instructions and policies be conveyed by administering agencies unless they are transmitted on paper?

How can the public, not to mention advisory groups and subcontracting service providers (who have important roles under the Older Americans Act), know what is going on—and what official goals are—unless they read from authorized sources?

These questions have special relevance under the Older Americans Act (OAA) which has, from its beginning in 1965, involved Federal, State, and local governments in mutual efforts requiring extensive communication and cooperation. In Washington, the U.S. Administration on Aging seeks nationwide compliance with broad objectives of the OAA. In State capitols, State units on aging (SUA's) develop statewide plans, drawing from local recommendations and performing important administrative and monitoring functions. All States are divided into planning and service areas which are served by area agencies on aging (AAA's)—widely varying in terms of size and placement in or outside of local government—which are directly involved in bringing services and people together.

This report examines the paperwork generated in a system¹ which includes the U.S. Administration on Aging (AoA), 50 State units on aging (SUA's—a term also used for similar agencies in four territories), 536 area agencies on aging (AAA's), and many more private and public agencies of one kind or another which provide services essentially through contracts with area agencies on aging.

In addition to quantifying sheer numbers and costs of paper, this report describes the categories, types, potential usefulness, and theoretical *raison d'etre* of the data being collected. It should be noted,

*Dr. Estes is associate professor, and Maureen Noble is professional staff associate, Department of Behavioral Sciences, University of California at San Francisco.

¹The term "system" is used broadly throughout this report to describe the interacting but not necessarily logically or coherently unified sets of reports, organizations, and activities generated by the OAA.

however, that these descriptions are an attempt to accurately represent the views of the Older Americans Act agencies which were selected for study.

Part 1 contains a summary of the three major issues addressed in the study. Section A concerns the volume of the paperwork and related issues of data reliability and validity. Section B is devoted to the general topic of the utility of the data collected in view of the diversity of administrative and programmatic OAA responsibilities generated by the act, and the accountability problems attendant to the multiple goals and the different intergovernmental levels involved in Older Americans Act programs. Section C seeks to describe the context within which the paperwork problem arises and must be resolved, including aspects of the role and constraints affecting the Administration on Aging (the major administering agency of the OAA). Recommendations, numbered consecutively, are presented at the conclusion of sections A and B in part 1. A discussion of methodology and a detailed presentation of substantiating data are presented in parts 2 and 3.

The analytic focus of the report is directed toward the "burden" of the paperwork required of Older Americans Act agencies in terms of the "problems" generated by using the data collection systems rather than focusing on the staff costs per se. The point was to identify the paperwork issues and anticipate the rationales which seek to justify them according to their use. By focusing on a critique of the reliability, validity, appropriateness (utility), and actual use of the data, the report addresses the major defenses for extant reporting systems. A more detailed analysis² of the full burden and costs of the data collection and information dissemination systems is needed if the basic conclusions of this report are accepted.

A. THE VOLUME OF PAPERWORK

The costs and volume of paperwork relative to program resources and administrative budgets have reached a critical point.³ The funding base of the Older Americans Act (\$354.5 million for titles III and VII in fiscal year 1977 and \$437 million for fiscal year 1978) is insufficient to support the tremendous amount of paper generated within the infrastructure of title III and VII agencies. Any action which would significantly increase this volume should be considered with caution; an attempt to reduce the volume of paperwork required of OAA agencies (including that for small title III direct service contractors) on a routine basis would be most advisable.

The Older Americans Act reporting system for titles III and VII alone annually amasses more than 15,000 million items of data dealing with basic contract compliance, at an annual cost exceeding \$1 million just for reproducing the forms and copying the reports for minimum mandated distribution (tables 1-7). This represents up to 7 miles of paper generated annually.

These paper costs do not begin to portray the magnitude of the problem. Since neither the work effort required to fill out this paper

² The authors can only report that the staff for paperwork was estimated in one study to consume one-third of agency staff time. See Ray Steinberg, "Follow the Rules to Red Tape or Blue Ribbons," report to AOA, 1975.

³ See part 2 of report.

nor the program costs incurred due to staff time lost are calculated in such estimates of paperwork costs, these basic "paper-systems-costs" represent only the tip of the iceberg relative to the actual costs of maintaining the paper flow. Nor do the reporting burdens decrease relative to the size of grants awarded subcontracting service providers. *Many OAA agency staff with title III subcontracts of less than \$25,000 felt that they spent more than one-third of their time maintaining reporting systems, handling information, tracking the paper flow, and so forth.*

Faced by reporting requirements which are not readily understandable or which seek data which are difficult or impossible⁴ to obtain, SUA, AAA, and subcontracting agencies may resort (at best) to guessing or (at worst) to "making up" data in order to comply with information requests by a given deadline. This problem is compounded by ambiguities concerning the appropriate way to derive the necessary statistics. For instance, data collected for program monitoring and assessment were described by OAA agency staff as not only often requiring guesswork but also as necessitating their own idiosyncratic (and nonuniform) interpretations of how to calculate the figures. Therefore, nationally compiled statistics reported on the same form and item may vary widely in how they are calculated and reported from agency to agency, locality to locality, and State to State. In this way, the current reporting system appears to result in the development of elaborate noncomparable data-sets of information which are of questionable reliability⁵ and validity.⁶ A very genuine concern then is that as the available data are aggregated from localities to the State level and from State levels into national figures, inherent inconsistencies and errors are greatly magnified.

In addition to these concerns about the comparability and accuracy of the data generated in the current paperwork system, many OAA agency staff questioned the appropriateness of the information. The issue here is whether there is any place in these reporting systems for capturing information on important activities and processes which may be more reflective of Older Americans Act goal attainment than the data (e.g., "head counts") which characterize current reporting forms.

All of these problems of reliability, validity, and appropriateness of current data on Older Americans Act programs are particularly significant because these are the data which form the basic system of information available to AoA program managers and to high level public policy makers in their respective deliberations concerning program implementation and legislative authorization and revision. OAA agency staff interviewed raised essential questions of accountability: Do the extant paper-systems of data collection and analysis generate the types of information requisite to such deliberations? How is the data base generated by Older Americans Act agencies used in the policy process? What criteria are or should be used in the design and revision of the data collection and information dissemination systems of the more than 3,000 agencies funded under the Older Americans Act?

⁴ An example of "impossible data" is a request for reporting accurately the number of low-income program participants while the OAA prohibits the use of "means tests" for eligibility.

⁵ The standards employed by different OAA agencies in deriving data bits (e.g., numbers served) are extremely variable because little or no instruction is given by AoA about how to arrive at the figures. This kind of problem seriously impairs the development of comparable, e.g., reliable data.

⁶ Validity refers to accuracy or "truth" of the information in reflecting what is actually happening. Without reliability (data comparability) it is impossible to achieve validity (accuracy).

Based on the central data problems discussed, the following recommendations have been developed for the Administration on Aging:⁷

(1) Mechanisms should be instituted to increase visibility of information problems for review of AoA senior-level management.

(a) AoA information requirements should be sharply delineated.

(b) Information's actual usefulness to program managers should be determined by AoA review mechanisms.

(c) A timetable should be set for reassessing the utility of each reporting system of the agency.

(2) AoA should assess the impact of paperwork burden upon agency staff in programs funded under the Older Americans Act.

(a) Burdens imposed by reporting and recordkeeping requests (e.g., costs, time, goal deflection, displacement) should be assessed periodically to identify opportunities for lessening this burden.

(b) AoA should distinguish among OAA agency capabilities for providing reliable and accurate information, recommend corrective measures, and then design data requests consistent with differing agency capabilities.

(3) Agency staff supported under the Older Americans Act and users of program data must be involved in continuing efforts to determine if information is reliable, accurate and appropriate. Reports wherein accuracy and reliability are suspect (users and providers do not trust the information) must be reduced or eliminated.

(4) For improved balance between expected information value and burden imposed by its reporting system, AoA should:

(a) Develop a clear description of the value of the information versus burden imposed (costs, time, money, staff, program).

(b) Consider alternative methods for obtaining information (e.g., use of probability sampling for selected data, or other existing information sources) with clear value/burden analyses attached to each.

(c) For new information requirements, insure consideration of such alternate methods for its acquisition (including selected staff visits and sample surveys) before data collection efforts are mounted *de novo*.

(5) AoA must seek clarification from Congress on the intent of any legislation likely to require excessive paperwork to operate programs—particularly where it appears that enormous data collection efforts for relatively modest information needs or program goals are not intended.

B. HOW USEFUL ARE THE DATA? WHO IS ACCOUNTABLE TO WHOM AND FOR WHAT?

Data are needed at all levels of programing and policy setting: local, regional, State, Federal, congressional. Within the context of the Older Americans Act, local projects need data for project management and program tuning; sub-State AAA's need data to monitor and assess the effect of their area plans, funding strategies, and coordination and

⁷ Parts of recommendations 1-5 are modified and expanded versions of the Procedural Objectives of the Commission on Federal Paperwork as contained in its correspondence of April 2, 1968. See "U.S. Senate Report on the Paperwork Review Limitation Act of 1976." (Hearing on S. 3076 before Subcommittee of the Committee on Government Operations) May 3, 1976, pp. 26-31.

pooling activities; SUA's require data to assure standards of performance and contract compliance, fiscal accountability, and the uniform implementation of OAA regulations; AoA needs data on the impact and performance of a national program strategy for its own management as well as for OHDS, DHEW, OMB, and Congress; Congress needs information in order to make national policy and alternative strategy decisions. Each of these different administrative, program, and policy levels is delegated sets of roles and responsibilities; each performs different but (hopefully) complementary functions which require specialized and unique data.

The hierarchy of accountability created by the OAA is far more complex than this portrayal of functionally distinct but interrelated roles for different units reveals. Under the OAA, accountability has both horizontal and vertical axes, cross-cutting and incorporating multiple jurisdictional lines and focusing on responsibilities ranging from policy development to program monitoring. The structure of accountability simultaneously involves the public, the aged, and their political constituencies as well as formally designated contractors, umbrella agencies, and subcontractors, and their diversity of perspectives, interests and roles.

Agencies funded under titles III and VII of the OAA are likely to be accountable to more than one legal juridical entity and at more than one governmental level. For example, AAA's universally are accountable to other bodies in addition to the SUA—e.g., to private, nonprofit agencies or to county supervisors. Similarly, SUA's are answerable to a number of entities and governmental levels in the course of carrying out their OAA-related responsibilities.

Each of the multiple and complex sets of interagency and intergovernmental relations generated in the implementation of the OAA are accompanied by diverse issues of accountability. As such, accountability may be of several types: it may be based on contractual and legally binding arrangements; it may be lodged in tradition or political philosophy rather than in formally codified requirements (e.g., public accountability); or it may represent some mix of these two types. This complex structure of accountability strains the extant data collection system; the informational demands which this diverse accounting structure requires cannot be met by the current reporting systems—systems which provide at best a narrow, fiscally oriented view of program efforts. Attempts to adapt the system on an ad hoc or incremental basis only generate further confusion.

In attempting to deal with both types of accountability for the OAA, this report includes an examination of the accountability issue in its broadest sense.⁸ To be accountable is to be capable of providing a reasonable explanation of what actions have been undertaken and what resulted. In this context, accountability will not be satisfied with a simple dollar or effort input-output analysis; it requires an analysis of effect, effectiveness and impact as well. This broad approach to issues of accountability has expanded our lines of inquiry (and subsequent conclusions). For example, in adopting a broad view of accountability, attention has been given to questions generated by OAA agency staff regarding the use of the statistics they prepare. This

⁸ In this report, the use of the term "accountability" encompasses but also extends beyond one traditional bureaucratic meaning of the term as being limited to the capacity to account for funds received and paid out (fiscal monitoring).

raises issues not only of data reliability and validity (which are essential under even the narrowest conception of accountability) but also issues of data suitability for the evaluation of activities supported under the OAA.

In addressing these central paperwork issues, the report is predicated upon two assumptions: (1) that the high costs of generating uniform monitoring data nationwide demand that these same data also meet the test of appropriateness for selected aspects of national program impact and strategy evaluation;⁹ and (2) that the magnitude of effort required for all OAA agencies of any single type (e.g., AAA's) to complete the required monitoring and performance reports is sufficient to require that each item be justified in terms of its utility for fiscal monitoring, program monitoring and management, evaluation and policymaking.

The idea developed throughout this study is that there is accountability to the extent to which reliable and valid knowledge is available for administrative and policy decisions concerning program expenditures, activities, consequences and the processes by which various outcomes are obtained. The decision to extend the paperwork report beyond a strictly managerial or technical viewpoint and to incorporate a more overtly political viewpoint (evaluation of program impact and the need to decide about strategies and policies) is based on the conviction that both kinds of capacity are essential for the implementation of title III at all levels of government. In a decentralized program like the OAA, the capacity for fiscal and program accountability needs to be developed at the local, State, as well as Federal level. In addition, the need to develop capacity in the areas of impact evaluation and policy studies exists at all three levels. If decentralization of programmatic decisionmaking is to be effective, it requires development of the skills and capacity needed to identify and develop policy at decentralized levels of government; otherwise "decentralization" merely serves as another "implementation" strategy and does not reflect any actual devolution of authority and responsibility to localities.

1. DATA COLLECTION PROBLEMS IN THE REPORTING SYSTEM: STATE AND LOCAL DATA NEEDS

The Administration on Aging is caught in a dilemma. In order to meet demands from OMB, DHEW and Congress for national impact data, AoA is forced to rely on data collection efforts which deemphasize and distort the variability inherent in a decentralized block grant planning program. Political pressures and incentives exist which support the continued reliance on a model of program accounting which treats the act as a categorical grant solely directed at supporting local direct service projects: Congressional expectations and the centralizing forces of large national bureaucracies create hierarchical demands for data which are at odds with the needs of local, regional, and State level contractors. At the local, regional, and State level the issues

⁹ Questions of program impact evaluation would provide data concerning the overall effectiveness of the OAA, title by title, in meeting its objectives, and its effectiveness in relation to other national strategies aimed at the objectives embodied in title I. Questions of program strategy evaluation concern the relative effectiveness of different techniques and strategies employed in the OAA program. See J. Wholey, et al, "Federal Evaluation Policy," Washington, D.C.: Urban Institute, 1971.

primarily concern fiscal accountability, efficiency, project ratings and assessment, program impact evaluations, and the immediate need for substantive data collection to guide the ongoing implementation and administrative efforts. These data are not readily forthcoming.

OAA agency staff identified four major problems in implementing the current reporting systems of data gathering for accountability: (a) the lack of clarity regarding goals and projected impacts of title III, (b) confusion about the measures of performance which OAA agencies must develop, (c) the lack of relevant baseline data either on the needs and conditions of older Americans or on the status of, local resources development and commitment (such data, of course, are prerequisite to any examination of "before and after" program effects, which is the essence of evaluation),¹⁰ and (d) concern that local project level data are aggregated and summarized so that they are not available or retrievable (through disaggregation) for project-by-project comparisons which might assist AoA and the agencies involved.

OLDER AMERICANS ACT GOAL COMPLEXITY

The development of the Older Americans Act and issues of goal complexity and clarity highlight a basic dilemma in American public policy. The dilemma reflects the hazards encountered when multi-dimensional problems, such as poverty or aging, are addressed through a strategy of interorganizational realignments which approximate institutional change (e.g., the development of comprehensive service delivery systems).

The core question is whether the OAA, as instituted on the decentralization principle (and thereby characterized by diverse emphases and activities), is evaluatable in the classic sense of the term. The crux of evaluation, is to be able to distinguish a program's effects from those of other forces working in the situation. As described by Suchman, components relevant to evaluation are: (1) the effort expended (amount of activity/input); (2) the effect (results of the effort); (3) the adequacy of impact; (4) efficiency (the effect in relation to the cost); and (5) the process (how the effect was achieved).¹¹

Rigorous evaluations are extremely difficult for social interventions based on multicausal models (e.g., title III of the OAA). This is particularly true where a series of determinants (e.g., planning, pooling, coordinating) are thought to be interrelated and requisite to achieving the desired outcome (e.g., the goals of title I of the OAA). As Estes and Freeman have argued elsewhere,¹² title III, with AAA responsibility for such a multiplicity of competing objectives, illustrates this kind of overextended program design.

¹⁰ The Administration on Aging in November 1974 introduced a program instruction PI-77-4 in an effort to begin developing uniform baseline data and operationalizing standards of performance. A thorough analysis of this trend is presented later in this report, part 3, section D, "Standards of Performance." This attempt to develop baseline data is subject to the same possibilities of unreliability and invalidity raised in the initial research for this report. Although the introduction of this phase in program accounting followed the original research for this report, the new system of "Standards of Performance" is discussed where appropriate in light of the major findings. Other problems of conflicting measures of performance and the of aggregating local and State performance data are outlined in AoA-PI-77, Nov. 3, 1976; see also, AoA PI-77-8, January 19, 1977, "Guidelines for the 1978 State Plan," AoA-PI-77-17, April 14, 1977, and AoA-IM-77-41, April 14, 1977. These are discussed in detail in part 3 of the report, section D.

¹¹ Edward Suchman, "Evaluation Research" (New York: Russell Sage Foundation, 1967).
¹² C. L. Estes, and Howard E. Freeman, "Strategies of Design and Research for Intervention", in R. Binstock and E. Shanas (eds.) *Handbook of Aging and the Social Sciences* (New York: Van Nostrand Reinhold Co., 1976), pp. 536-560.

The act is designed to create new institutional and organizational commitments through the mandated activities of planning, coordination, pooling, advocacy, and seed funding. The projected impacts range from senior mobilization to increases in budget allocations for the elderly.

AAA and SUA title III mandates (coordination, pooling, seed funding) may serve alternately as change strategies or implementation techniques once major decisions have been made. The various activities which fall under these headings are numerous, and range from "pump priming" through title III funding, provision of technical assistance to local agencies, assistance in developing proposals to generate dollars for the community, advocacy, and so forth. The product of these activities, grouped under the major headings of the mandates (above), should be a comprehensive service delivery system which meets the needs of the elderly. This product represents title III's long-range policy goal, while most of the service-related programmatic activities discussed in the act encompass intermediate or short-run goals.

It is the aggregation of these myriad OAA activities and outputs into valid and reliable long-run impact measures and sophisticated interactive models that precludes clear and simple definitions of "input" or "output" in terms of goals and goal achievement.¹³ *Although there appears to be a logic inherent in the title III strategy, its complexity and the apparent inability of program managers or policy-makers to uniformly operationalize activity definitions in terms of predicatable outputs seriously impedes implementation of a national system of monitoring or evaluation.*

There is uncertainty among OAA agencies about what should be emphasized and how to concentrate scarce resources. In particular, AAA staff reported concern about the lack of uniform and definitive expectations regarding what constitutes minimally acceptable progress and performance for each of the major intervention strategies within title III and the relative emphasis which they should give (1) between the many areas of assigned responsibility (e.g., pooling, coordination, services, advocacy), and (2) within any one of these strategy emphases (e.g., emphasizing low-income or all elderly in service subcontracting). Such goal complexity and the resultant ambiguity of preferred outcomes have critical ramifications for accountability and the political vulnerability of OAA agencies to all sorts of criticism. *Without knowing what represents an acceptable performance, how can agencies be held answerable? And, without clearly delimited long- and short-term expectations, how can the success (or failure) of title III or title VII be substantiated against the claims of its critics?*

PERFORMANCE MEASUREMENT ISSUES

The OAA and other multiple-thrust strategies are the most difficult to monitor and evaluate. They necessitate the delineation of complex measures of short run, intermediate and long-term performance and impact of AAA's in the difficult tasks of program development, inter-organizational rearrangement, power realignment and the rational-

¹³ Additional evaluation problems generated by multiple thrust strategies are outlined in subsection B-2 of part 1 on the dearth of available methodologies to tap cause-effect sequences in comprehensive social programs.

ization of resource allocation processes of local service systems. This is a heavy demand given available methodologies and the state-of-the-art of program evaluation. Data concerning "how" and "how well" the program works in its varied forms need to be developed at national, State, regional, and local levels; performance data are not available.

The limited resource base and capacity for monitoring and evaluation of State and sub-State agencies is part of the problem of accountability. AAA staff report that AoA's attempts to specify performance measures¹⁴ overreach State and local capacity to develop well documented data. Reliance on performance measures whose collection requirements exceed time, money and staff expertise will be of questionable accuracy.

AoA's 1976 program instruction on performance standards initiated procedures which will depend heavily on the staff capability of OAA agencies in developing their own standards. As described in AoA's issuance on standard-setting,¹⁵ AAA's are asked to set their own performance standards (via a bottoms-up process)—which are then aggregated at the State level, where the SUA then sets its own individual standards based on this local data and on its own State level activities. It is the national aggregation of these State performance data (based on independent and diverse State standards) which, when coupled with special Federal level activities in their purview, will constitute AoA's national performance standards.

AoA's decision to delegate decisionmaking about the measurable criteria by which each major Older Americans Act program is to be judged is consistent with the decentralized discretion underlying new federalism strategies.¹⁶ Of note, however, is the potential negative consequence of this deemphasis on national standards for achievement of national policy objectives for the aged. A crucial problem is that a reporting system predicated on self-created (and variable) standards and essentially self-evaluated (and variable) performance poses a real dilemma in accountability. Who is accountable to whom and for what?¹⁷ Can national goals be realized when there is wide variability across State and area standard-setting?

Without relatively uniform national standards, there is little possibility of assessing comparative performance or to develop incentive systems which reward outstanding State or local performance.

Another problem is that, where performance measures are provided, they do not accurately reflect SUA and AAA performance but rather largely focus on the performance of local subcontractors. By concentrating on the discrete quantifiable outputs of title III subcontracts, the current system generates output measures whose variability may well be more a function of local factors than State, regional or national policy and efforts.¹⁸

¹⁴ An example cited is AoA's recent effort to identify and develop national and statewide baseline data on the numbers served and dollars expended on aging services.

¹⁵ See AoA PI-77, November 1976.

¹⁶ C. L. Estes, "Revenue Sharing: Implications in Policy and in Aging," *Gerontologist*, 16, No. 2, 1976 141-147.

¹⁷ This, of course, is the central dilemma of decentralization. See section C, part 1 for a detailed discussion of this problem.

¹⁸ An example would be an attempt to compare cost per unit of transit services in Florida and California, where the major explanation of any variability is likely to emanate from the State of existing transit systems, other available resources, and variability in population demands, rather than category of service funded (which is the type of data now collected in the reporting system).

SUA and AAA performance, as measured by direct service outputs of title III subcontractors, misses some of the most critical dimensions of SUA and AAA responsibility for performance (e.g. the interrelationship and comprehensiveness of these subcontracted direct services). The focus of accountability is almost solely on the service outputs of title III subcontracts, while service subcontracting is but one small part of AAA responsibility. As such this reporting system is more appropriate for categorical service programs where applicable output measures include units of service provided.

An additional gap in the reporting system is that it does not obtain information on the processes by which the program is being implemented; it reflects none of the SUA or AAA dynamics and problems of implementation as they mature. What is needed here is information on how the program works. This type of data differs from project tracking and assessment based on simple inputs (dollars) and outputs (staff, contracts, services) which are easily quantified services statistics. One of the major problems is that the current compliance reporting system does not capture these processes—and yet these are the very data needed to guide regional, State, and Federal administration, regulation and policy development. The systematic exclusion of substantive process data denies program managers at all levels (and especially at central AoA) the information necessary to understand how a preferred program outcome was (or could be) achieved. Therefore, this limits both AoA's knowledge about what works and AoA's ability to modify or design new strategies to achieve desired program performance in the future.

Any reporting system must be predicated on negotiated contracts with some degree of mutual agreement about products and activities between contractor and contractee. In the case of the OAA, a system of monitoring and evaluation based on clearly negotiated outputs is missing and in its place has arisen a system of control which relies on bureaucratic regulation. The system emphasizes narrow administrative rather than broad programmatic achievements. The result is a truncated view of the act, supported by the reliance on simple output measures. Lacking clear operational definitions of the ends to be reached, the accounting, data collection and monitoring systems, emphasize the means (e.g., number and types of contracts, services), thereby constraining local initiative from more difficult long-range efforts, without guaranteeing either quality programing, or minimum levels of output.

In particular, OAA agencies are encouraged to adopt projects and policies with pragmatic short-run outputs because this is what report data reward. AoA is similarly encouraged to set assessment and evaluative criteria which focus on immediate outcomes. Both of these tendencies discourage AoA and OAA agencies' leadership from developing and supporting program and policy efforts of long-range national import, encouraging instead, the dominance of projects shaped by short-term program implementation politics.

What is crucial is that the types of activities for which compliance report data are collected become the types of activities which are explicitly valued—that is, the activities which receive attention in the reporting system are those for which AoA may sanction OAA agencies (positively or negatively). What is of concern is that many of the

mandated activities appear to have dropped out as represented by the reporting system.

Finally, in the absence of appropriate AoA performance measures, it is possible that valuable approaches within the larger strategies of the act will be discredited because there are no data which can prove or disprove success. Program failure may be attributed to the entire title III strategy, for example, without possibility of contradiction, unless significant attention is given to the development of standards and of reliable, valid data for performance.

BASELINE DATA ISSUES

The availability of baseline data is prerequisite for evaluating performance. The need to implement national policies in a timely manner usually mitigates against the preparation of preprogram baselines. Once the program is underway resources are rarely available and current methodologies may be inadequate to the task of retrospective measurement and if these difficulties are compounded by issues of definition (e.g., if goals are not clearly defined, impacts operationalized, or standards of performance developed), how can baseline data be collected?

An initial AoA effort has been made to develop national baseline data via AoA-PI-77-4, November 1976, addressed to State agencies administering plans under titles III and VII of the Older Americans Act. To quote:

Figures have been reported by each State . . . (of) the number of older persons estimated to be receiving each of the six priority services as of November 1976, and projected estimates of older persons expected to be receiving the services as of September 1977.¹⁹

Unfortunately, these baseline data are reportedly replete with the reliability and validity problems previously discussed. The following types of concerns were reported:

The issue of data comparability, validity, and reliability

(1) It is unclear what (and if standardized) criteria were used for units of service; for defining new individuals served; for projecting increases in numbers served; and for assembling the data (best estimates by telephone or written reports).

The issue of standards of performances

(2) It is not stated on what basis regional AoA office will accept or reject projected increases and whether sanctions may be applied if projections are not met.

The issue of appropriateness in the measures of performance

(3) Further, the question arises as to whether this effort will improve accountability or will obscure actual expenditure and impact of funds for mandated activities (coordinating, planning, etc.) under title III.

¹⁹ These estimates were compiled by each State from service provider agencies, representing all services from public and private sources.

The issue of methodological sophistication and resources

(4) How feasible and costly are the data collection efforts needed to develop and maintain baseline data?

At minimum, AoA's evaluative capacity must include research to distinguish the effects of the OAA, title by title, from the effects of other variables contributing to outcome. This is what is meant by evaluation—"the ability to isolate what would have happened in the absence of the program."²⁰ Because baseline data are prerequisite to this capability, immediate effort must be expended to tap reliable and valid baseline information which permits relevant comparisons over time.

DATA AGGREGATION-DISAGGREGATION ISSUES AND PROJECT RATINGS

At the AAA level the title III resource allocation process necessitates discrimination between similar projects and proposals both in the initial round of funding and in subsequent years. The continued support of local programs through refunding requires a decisional process not solely guided by crisis, politics and the pressures of grantsmanship—this is, by a process informed by good data. However, at present it is unclear how useful the data reported to AoA are for project ratings. The purpose of project rating in this instance would be to address the program management issues of how to organize resources within the given OAA program to achieve the greatest effect. There are several reasons for the inadequacy of AoA's report data for this purpose: (1) As defined by Wholey, et al.,²¹ project rating focuses on output/outcome oriented project classification and rating systems that permit, for example, the identification of the top 10–20 percent and bottom 10–20 percent of each class of projects that have similar objectives and demographic environments. To do this, it is necessary to establish uniform standards (which do not currently exist); (2) the data (aggregated and reaggregated from the subcontractor to the AAA level, from the AAA to the SUA level, and then from the SUA to the national level) prevent project-by-project comparisons required to examine the relative success of different projects;²² (3) the utility of current report data, even if disaggregated by individual projects, is severely limited because it tends to measure volume of business rather than program effect on the community or population served.

In conclusion, the design of the act creates problems in accountability.²³ The information and data needs of local projects, AAA's, and SUA's are not being met adequately. A full range of problems has been outlined: gaps in data to support statewide or national project ratings, the lack of consensus about standards of performance, the generalized confusion surrounding activity definitions, specific concerns about data validity, reliability, and appropriateness. These problems seriously affect data utility at subnational program levels,

²⁰ Joseph S. Wholey, et al., "Federal Evaluation Policy" (Washington, D.C.: Urban Institute, 1971), p. 106.

²¹ See Joseph S. Wholey, et al., "Federal Evaluation Policy" (Washington, D.C.: Urban Institute, 1971) for a detailed description of this type of evaluation.

²² The data are summarized at and forwarded from the State level; no records of individual OAA's projects activities within the State (sub-State levels) are forwarded to Washington, D.C.

²³ See section C for a more detailed discussion of these problems in the section on dilemmas of decentralization.

and as the ratio of useful data declines, given the marginal utility of the system's outputs, the absolute costs increase.

2. FEDERAL ACCOUNTABILITY AND EVALUATION

The current system of program accountability reflected in AoA's information collection system generates evaluation-relevant data primarily on the effort expended²⁴ and selected outputs²⁵ of title III SUA, AAA, and direct service contracts at the sub-State level and the title VII projects. As described in this report, data are meager which are pertinent to the evaluation of (a) the individual or combined impact of planning, advocacy, coordination, pooling, and service provision efforts under title III, and (b) the impact of title VII.

With these and other problems inherent in the current system of accountability, questions about the impact of OAA title III and VII strategies at the national (as well as at State and local) level are difficult to answer. As a consequence, substantive criticisms of the programs funded under these titles of the act are almost impossible to refute or substantiate.

If the answers are not found within the present OAA reporting system, are there alternative sources to which we can turn for answers to the significant questions about the relative impact and import of the Older Americans Act? The most obvious alternative is AoA's evaluation and research program (the evaluation portion of which is supported by a 1-percent set-aside of OAA program moneys).

To date, much of AoA's evaluation and title IV-B research has been given to grants and contracts for descriptive studies which aim to develop and recommend refined organizational models of coordination, planning and so forth.²⁶ However, major methodological and conceptual issues remain which limit the utility of these studies for informing national policy decisionmaking.

NATIONAL PROGRAM IMPACT EVALUATION

AoA's current evaluation contracts,²⁷ as well as its evaluation plans,²⁸ do not address issues of national level program impact evaluation. National program impact evaluation would address significant questions about the overall effectiveness of the Older Americans Act, title by title, in meeting its objectives and assess its effectiveness in comparison to other national strategies aimed at the basic objectives embodied in title I of the OAA. This type of evaluation requires research designs which suspend the notion of title III as the only acceptable strategy for attaining title I objectives. It would encourage studies which assume AAA's are but one among many mechanisms for attaining OAA objectives. The ability of AAA's to achieve these

²⁴ "Effort" refers to program input such as agency resources.

²⁵ "Output" refers to the result of program effort (or input), e.g., minorities served. Major output are numbers served, types of services provided, and their characteristics.

²⁶ This trend may be shifting as the preliminary 1977-78 proposed evaluation plan discusses the growing importance of longitudinal impact evaluations. See "Request for Pre-Plan Concurrence in Fiscal Year 1977-78 Evaluation Projects," December 4, 1976, Administration on Aging.

²⁷ Title III and title VII are each in the process of being evaluated, under contracts to the Administration on Aging.

²⁸ Evaluation plans for AoA for fiscal years 1974, 1975, and 1976 were examined as well as the AOA document entitled "Request for Pre-Plan Concurrence in fiscal year 1977-78 Evaluation Projects," December 4, 1976, Administration on Aging.

objectives relative to other potential vehicles (e.g., direct provision of services to planning and service areas without AAA's) must be examined. One example of such an approach would be to study equivalent national samples of localities with and without AAA's for their relative resource base development "pre" and "post" the 1973 amendments. Another example would be a title VII evaluation approach which extends beyond questions of the impact of the title VII program²⁹ on its recipients. It would ask as well whether other program strategies could achieve the same or better results for the same or less cost. That is, can similar (or better) sociability and nutritional benefits be achieved using some other strategy than the title VII meals program? And what else might be gained or lost with alternative programs? Broader questions also could be asked e.g., whether the program has made any inroads into altering the conditions of hunger, isolation, and loneliness of the aged in the communities in which these meals programs operate.

The point is that, to date, most relevant AoA evaluation and research has been devoted to program "tuning" with little emphasis on comparative evaluation which suspends (by critical examination) the notion of title III or title VII as the only acceptable strategy.

All of the aforementioned problems of goal complexity, multiple-thrust strategies, and their performance measurement problems, inhibit the ability of AoA evaluation efforts even to address the issues of national program strategy approaches within the act. (Program strategy evaluation addresses questions of the relative effectiveness of different techniques and strategies employed within a national strategy, for example, title III.)

This leads to the issue of whether a strategy of planned variation might not be adopted by AoA which would systematically introduce variations in structural or programmatic requirements of the program in order to test the relative effectiveness of different promising strategies. A planned variation approach would begin to positively address the perplexing issue of whether the OAA in general, and title III in particular, can be evaluated. It would be possible to evaluate outcomes (insofar as specific program elements were tied to specified program outcomes) with studies based on the specification of the hypothetical interactive relationships between program elements.³⁰

THE ELDER AMERICAN: AN IRRELEVANCE IN ACCOUNTABILITY?

Curiously, OAA paperwork reflects an accountability system which largely bypasses the issue of impact of the Older Americans Act upon the 23 million older persons for whom it was designed. There are no known past, current or proposed major research or evaluation efforts

²⁹ The major national evaluation study of title VII which is currently underway, focuses primarily on the social rather than the health benefits of the program or its recipients (except by meal recall). The question not posed is whether another type of approach could accomplish what title VII accomplishes—as well or better.

³⁰ For further discussion of this, see C. L. Estes and Howard E. Freeman, "Strategies of Design and Research for Intervention" in R. Binstock and E. Shanas (eds.) *Handbook of Aging and the Social Sciences* (New York: Van Nostrand Reinhold Co., 1976), pp. 536-560.

examining the Older Americans Act from the viewpoint of the elder American.³¹

The crucial questions to be considered are:

- Is there any difference, experientially, in the lives of older persons today in comparison to what it was in 1973, prior to the implementation of the Older Americans Act? Individually? In the aggregate?
- Has the condition of older persons been improved? If so, what is the relationship of such improvements to individual strategy components (or the totality) of the Older American Act effort?

In adopting research and evaluation strategies which incorporate this perspective (see recommendation No. 8 below), comparative analyses are required which study community samples of older persons selected from localities with varied AAA influence and intervention emphases (e.g., on advocacy versus planning, or service provision versus coordination) in contrast to samples of older persons from matched communities without designated AAAs or nutrition projects.

In addition, research is needed to examine the local level distributional patterns of services for the aged prior and subsequent to the 1973 AoA amendments. Unfortunately, there are no available relevant baseline data for a national evaluation effort of this kind. For example, there are no data which indicate the level of service provision or extent of unmet need in even a sample of localities prior to implementation of the 1973 comprehensive services amendments (although it may be available idiosyncratically in some localities). Without such baseline data, it is not possible to accurately determine the effect of OAA agencies. The time to commence collection of such data is now.

RECOMMENDATIONS FOR A NATIONAL EVALUATION STRATEGY

Federal evaluation policy needs to be instituted which is informative for national program strategy policy choices under the Older Americans Act. Consonant with the objectives of the Federal Paperwork Commission, the following recommendations are proposed³²—that:

(5) AoA institute a Federal evaluation strategy for the Older Americans Act which concentrates available evaluation resources for national level program strategy evaluation which:

(a) Comparatively evaluate outcomes in samples of similar types of OAA projects operating in different contexts but, with the same problem focus and approaches, utilizing the same measures to compare;

(b) Comparatively evaluate the effects (and their adequacy) of samples of OAA projects in similar contexts which have opted for different approaches (e.g., within the multiple-thrust title III strategy).

³¹ The only known consideration of directly involving older persons in OAA evaluation is described in a December 4, 1976, memorandum from U.S. Commissioner on Aging, Arthur Flemming, to Stanley Thomas (former Assistant Secretary for Human Development). The proposed project, for inclusion in the fiscal year 1977-78 evaluation plan, was entitled, "Evaluation of Older Persons Who Receive Social Services." Its objectives were to include the validation of SUA data on the number of elders served in each priority area and to determine the degree to which target group elderly receive priority services. As proposed, this evaluation contract would mainly seek to verify State reported data; it would not investigate the experience and assessment of OAA programs by the elderly themselves.

³² The authors are indebted to Joseph S. Wholey, John W. Scanlon, Hugh G. Duffy, James S. Fukumoto, and Leona M. Vogt for many of the ideas contained in these recommendations. See J. Wholey, et. al., "Federal Evaluation Policy" (Washington, D.C.: Urban Institute, 1971).

(6) AoA seriously consider adopting a policy of semicontrolled "planned variation"³³ among title III, V, and VII projects, but only in conjunction with recommendation 5 above and 7 below. AoA should systematically evaluate and compare the effects and effectiveness of major variations within each of these programs under varying circumstances. Characteristics to be varied should be those (a) thought to be basic variables affecting program output and (b) structural features of program organization susceptible to implementation with relative consistency in a variety of situations.

(7) Federal evaluation policy should institute concerted research to systematically tap the older Americans' experience and evaluation of the different OAA programs, and of the service availability before and after passage of the 1973 amendments.

RECOMMENDATIONS FOR AUGMENTING THE UTILITY OF AOA'S REPORTING SYSTEMS WHILE DECREASING PAPERWORK BURDEN

(8) AoA should develop comparative project ratings. This will require upgrading quality³⁴ and utility of information, initiation of standards for rating and methodologies which permit disaggregation (as well as aggregation) of data from individual agencies. Project rating should link issues of administrative efficiency with issues of project outputs and establish incentive systems to reward projects which are outstanding according to the project rating system.

(9) AoA should reduce paperwork by using the principles of statistical sampling to delimit the multiple reporting requirements by all agencies of a particular type, e.g., AAA's. (It is impractical in cost and quality control to require all agencies to report all data.) Decreasing paperwork and increasing data quality can be accomplished by instituting unified systems of State and local reporting that will, on the basis of valid probability samples, provide a more accurate accountability of more select and evaluation-relevant data. (It may be necessary, of course, to collect selective data from all agencies, but its value should be established in advance.)

RECOMMENDATIONS FOR EXECUTIVE OR LEGISLATIVE ACTION

(10) Title III, section 308, Model Projects, should be strongly supported to provide for the conduct of systematically designed and evaluated experimental demonstration projects. Such projects should be reserved for testing alternative strategies for achieving the goals embodied in title I of the OAA. This will require congressional funding for experimentation and a commitment by AoA to develop an integrated and focused research and demonstration strategy devoted to testing policy alternatives of national import.³⁵

³³ *Ibid.*, p. 100. The initiation of "planned variation" within the mandates of the act (e.g., strategies of advocacy, services, planning) are most effective. This could be done by operating parts of the program as field experiments, or by systematically varying and studying certain aspects of the program.

³⁴ Laudably, in 1976 AoA announced its intention to fund a contract to verify the accuracy of quarterly report data (Memorandum for U.S. Commissioner on Aging, A. Flemming, to Stanley Thomas, Assistant Secretary for Human Development, Dec. 4, 1976). Additional, more systematic investigation is needed to deal with some of the data problems reported by study respondents.

³⁵ The discretionary funds are the single resource base through which the Commissioner on Aging may develop and demonstrate the relative value of alternative strategies. Therefore, it is imperative that discretionary funds available under title III, section 308, and title IV-A, B, and C, be employed neither as a means of additional service funding, nor as routine problem solving for OAA agencies. Instead, these discretionary funds must be reserved for research and demonstration efforts which are likely to further the attainment of long-range goals for the aged.

(11) On a broader level, the President or Congress should require "initiation of (1) national program impact evaluations that cross agency lines³⁶ to compare the effectiveness of related programs in achieving common objectives and (2) evaluations of how different Federal programs can be used together to create effective local programs."³⁷

(12) "Congress should require, every 2 or 3 years, program impact evaluations of each major Federal program (including the OAA). These evaluations should be done at a level removed from direct control of the program manager (in this case, AoA). Congress should provide funds and staff to design, supervise, execute, and disseminate these evaluation studies,"³⁸ and "Evaluation results should be required in the drawing up of budgets and legislative proposals."³⁹

(13) Future OAA authorizing legislation should incorporate a statement of desired program results. In the case of the OAA (particularly title III), multiple outcomes appear to be desired. Yet there appear to be few specified mechanisms and resources for achieving them simultaneously.

C. THE CONTEXT OF ACCOUNTABILITY

Problems of program accounting and evaluation are not resolved easily; the problems inherent in developing and implementing a nationwide system of comprehensive services while answering to many masters may well represent an impossible task. The criticisms presented herein reflect the institutional and organizational problems that beset large national programs operating within limited resources and, perhaps most particularly, those which are aimed at decentralization in the process. The basic intent of reporting systems is to develop "accountability." The current methods of implementing a uniform national system of program accounting and evaluation are beset with structural and methodological problems and cannot provide the best, or even a fair, picture of the efforts and activities of Older Americans Act agencies.

This assessment requires an explanation. Most important are the unresolved dilemmas of accountability endemic to a decentralized program effort aimed at attaining national goals. Additional contributing factors are the constraints on AoA: their staffing reductions and administrative location within OHDS. Finally, congressional-administration divergence and uneasy compromises have contributed to a national strategy which is neither internally consistent nor specific. These factors create a context which impedes efforts to meet the need for National, State, regional and local accountability.

1. DILEMMAS OF DECENTRALIZATION

The issues of accountability reported here largely represent dilemmas at the heart of the New Federalism as embodied in revenue sharing legislation.

³⁶ AoA has indicated its desire to do this in a limited way by "assessing . . . evaluation of programs related to the elderly taking place in DHEW and other Federal agencies, [and] identify areas where joint funding of evaluation would seem desirable. . ." (AoA Forward Plan, fiscal year 1975-80, p. 65, transmitted in AoA-IM-75-44, Feb. 7, 1975). Executive or legislative mandate would hopefully strengthen AoA's ability to do this.

³⁷ Wholey, *et al.*, p. 112.

³⁸ *Ibid.*, p. 113.

³⁹ *Ibid.*, p. 113. This may be particularly difficult to implement. For a discussion of this topic, see "Policy Analysis" 2 (2), Spring 1976, entire issue.

Although predating special revenue sharing, the OAA reflects New Federalism principles in its charge to SUA's and AAA's to set priorities in accord with needs to be determined at subnational levels. In the OAA, as in revenue sharing enactments, Congress has transferred significant decisionmaking authority for program emphasis and direction from national to State and local arenas.

This decentralization has generated interorganizational and intergovernmental tensions and dilemmas because of the (1) wide areas of discretion and attendant uncertainty which are permitted and (2) questions of assuring accountability under conditions of enhanced State and local autonomy. A major controversy has been the extent to which transfers of authority under New Federalism would actually result in more (rather than less) responsive or better planned programs and expenditures at subnational levels.⁴⁰

Many are concerned that national objectives and priorities (and more liberal gains of the past) may be lost with the devolution of authority unless specified and regularized mechanisms of accountability are instituted. Schultze⁴¹ goes further to argue that incentives are required to insure decisionmaking at subnational levels compatible with central program goals. What is required is:

A system of rules, organizational structures, performance measures and penalties and rewards, which induce decentralized decisionmakers . . . to act in ways consistent with overall program plans and objectives.⁴²

The challenge and the central dilemma of decentralization is striking a balance between the degree of State and local discretion necessary to responsively plan for and meet the needs of the population, and the requisite accountability to insure performance congruent with national objectives concerning those needs.

Warren argues that the balance, of necessity, becomes a trade-off in which:

Movement toward attaining a specific objective [accountability] detracts from the attachment of a different objective [decentralization], so that one is faced with a choice.⁴³

As Warren describes it the critical question of New Federalism pivots on the trade-offs which this strategy⁴⁴ requires in: (a) standards,⁴⁵ (b) accountability, and (c) national social policy priorities. Particularly relevant to the topic of this report, Warren concludes that New Federalism objectives of reducing redtape and paperwork (via decentralization and grant consolidation) are likely to be incompatible with standards and accountability. Similarly, he finds incompatibility between the decentralization and rational planning objectives—indicating the necessity for further trade-offs.

⁴⁰ Edward C. Banfield, "Revenue Sharing in Theory and Practice," *The Public Interest*, No. 23 (Spring 1971). See also C. L. Estes, "New Federalism and Aging," *Developments in Aging: 1974 and January-April, 1975*, a report of the U.S. Senate Special Committee on Aging, Washington, D.C., 1975.

⁴¹ Charles L. Schultze, "The Role of Incentives, Penalties and Rewards in Attaining Effective Policy," *Public Expenditures and Policy Analysis*, R. H. Haveman and H. Margolis (eds.), Chicago: Markham, 1971, ch. 6.

⁴² *Ibid.*, p. 146.

⁴³ Roland L. Warren, "Competing Objectives in Special Revenue Sharing," paper delivered by Stanford Research Institute Conference on Approaches to Accountability in Post-Categorical Programs, Aug. 20, 1973.

⁴⁴ New Federalism is characterized by Warren as having six objectives: (a) decentralization, (b) grant consolidation, (c) strengthening State and local capacity, (d) reducing red tape, (e) strengthening rational planning, and (f) innovation and structural change.

⁴⁵ Standards include: (a) quality of planning, (b) quality of program content, (c) nature of target group, (d) soundness of fiscal management, and (e) nature and extent of citizen participation.

Additional questions are raised concerning State and local capacity for planning and program decisionmaking, and the extent to which the removal of Federal requirements will culminate in politically motivated rather than need-based programs and allocations. To quote one of the authors of this report:

Is it reasonable to assume that State and local governments will engage in social planning and resource allocation procedures in preparation of block grant funded programs, as proponents of the New Federalism essentially argue? This question raises obvious issues regarding the staffing, capability, and commitment of States and localities to long-term and coherent strategies, priorities, and objectives [in the face of intensified home-based political pressure]. It also requires serious consideration of the enactment and implementation of Federal mandates for minimum standards in some of these areas.⁴⁶

What is most significant in Warren's argument is his notion of competing objectives within New Federalism—and what each may involve in trade-offs of other objectives, standards, accountability and/or national priorities. Simply stated, "one can't have it both ways."

Warren's portrayal is applicable to the OAA. As stated previously in section B and elsewhere,⁴⁷ the OAA contains competing objectives, some of which are short-range (title VII nutrition services) and others of which are long-range in demonstrable performance (aspects of title III, planning, developing comprehensive services). The objectives of the title III and VII programs are competing in relative popularity. Insofar as short-term immediate payback (e.g., meals "services") is visible and may be directly experienced by older persons, the title VII nutrition program is likely to be credited a great benefit—regardless either of relative long-term nutritional effects on older persons (if any) or of the relative costs and benefits of alternate strategies for increasing socialization or nutrition. Yet, accountability for this relatively finite, specified meals program may be partially met via numbers counts of program participants (although impact evaluation remains crucial for this national program). In any event, because of its popularity, title VII just feels or seems accountable.

In contrast, the relative ambiguity of title III objectives—which lend themselves to many varied interpretations and emphases—makes SUA's and AAA's vulnerable to the "slings and arrows" of charges that they are doing nothing because many title III objectives are not visible (e.g. pooling) or immediate in their return.

The greatest problem of accountability is that title III objectives are long range in their performance. Immediate measures of expected accomplishment are difficult to design—particularly when we know so little about what title III agencies actually do (most reports collect quantitative "numbers" data and most research described agency characteristics, not processes or detailed accounts). Yet with the

⁴⁶ C. L. Estes, "Revenue Sharing: Implications for Policy and Research in Aging," *Gerontologist*, vol. 16, No. 2, 1976, pp. 141-147.

⁴⁷ C. L. Estes, "Community Planning for the Elderly: A Study in Goal Displacement," *Journal of Gerontology*, 29: 684-91. C. L. Estes, Phillip Armour, and Maureen Noble, "Intent versus Implementation," unpublished paper, October 1977, University of California, San Francisco.

ambiguous and long range goals, it is all the more necessary to hold agencies answerable for step by step progression toward the goal accomplishment. The multiple and divergent goals selected and the differences in resource availability and commitment provide SUA's and AAA's different types of challenges of varying degrees of difficulty, and these variabilities in turn create measurement problems for which sensitive procedures must be designed.

Simultaneously, precisely because of the multiple-thrusts of title III and divergent conceptions of what it is, there are heightened pressures that title III programs be answerable. This again raises the earlier question about how to be answerable in the short-run, when title III is primarily a program based on long-run objectives.

On the topic of standards, what is the national prerogative in uniform standard setting and assessment under a policy of decentralization? AoA's response to this problematic question is illustrated by their solution. AoA's solution to this dilemma of whether to set standards for OAA agencies while also cognizant of having to demonstrate accountability has been to request each State (and locality) to set its own independent standards against which agency performance will be measured across the Nation. Given the anticipated variability and self-selection in the standards, how will AoA be justified in drawing any conclusions about how this aspect of the OAA is working? Is accountability traded off for decentralization in this instance?

2. AoA STAFFING CUTBACKS

While OAA program authority and responsibility has been expanding, the size of the central AoA staff has been reduced. AoA staffing reductions have been a recognized problem for at least the last 2 fiscal years (fiscal years 1977 and 1978), as indicated by appropriations testimony given by the Gerontological Society. Figure 1 is drawn from that testimony submitted to the U.S. Senate and House Subcommittees on Labor-HEW appropriations in June 1977. As shown, *increases exceeding 40 percent in program authority (number of programs) and 64 percent in fiscal management (dollar appropriation levels) occurred between fiscal years 1975 and 1977 alone; while a 16.4 percent decrease occurred in AoA assigned staff positions.* Since this chart was developed, additional staff losses have further reduced staff to 89 positions⁴⁸ (via freezes from vacancies and/or within OHDS transfers). This is more than one-third (36 percent) below the 140 staff positions recommended by the Gerontological Society for AoA for fiscal year 1978. Unfortunately, these AoA staff reductions have predictably decreased the capacity (and morale) of remaining central office staff to carry out their mandated functions, as they must perform the tasks of departing fellow staff in addition to the new functions attendant to their continually increasing administrative and programmatic responsibilities.

⁴⁸ Interview data reported in November 1977

FIGURE 1.—AOA APPROPRIATIONS, PROGRAMS, AND STAFF POSITIONS BY FISCAL YEAR (1973-77)

Year	Fiscal appropriation	Number of separate grant programs	Staff positions assigned
1973	\$200,000,000	5	122
1974	212,100,000	5	122
1975	245,000,000	5	120
1976	266,835,000	7	120
1977	401,025,000	7	120

¹ Under current OMB policy the figure has been recently dropped to 102.

Note: There is a very critical need for an increase in staff-to-management direct research and development of multi-disciplinary centers. The number of staff relative to the responsibilities is very low. Current staff, although quite competent, are seriously overworked. Consequently, additional professional and support staff are seriously needed.

Source: App. C, Gerontological Society testimony to U.S. Senate and House Subcommittees on Labor-HEW appropriations for fiscal year 1978 AOA appropriations.

The study findings in parts 2 and 3 concerning reporting system inadequacies may be partially attributable to the serious understaffing of AoA. More important, the implementation of most, if not all, of the study recommendations for AoA will require the return of AoA's central office staffing capacity to at least its initial 1974 level of 122 positions.

3. AOA ADMINISTRATIVE LOCATION

The placement of the central responsibility for Older Americans Act programs directly in the Office of the Secretary of DHEW has long been a goal of advocates for the aged. Efforts to accomplish this, however, have failed in the face of a series of general governmental reorganizations and consolidation efforts undertaken by the last three U.S. Presidents.

Although AoA was removed from Social and Rehabilitation Services (SRS) in 1973 and placed within the newly created Office of Human Development (OHD), DHEW, with commissioner-designated autonomous authority in many areas, the fact is that AoA's administrative and programmatic latitude is necessarily affected by its current location in the Office of Human Development Services (OHDS). The same, of course, would be true for other units lodged within larger agencies, who therefore do not control all of their fiscal and staffing allocations.

One consequence of the placement of the central administering agency of the Older Americans Act (AoA) within OHDS is the current AoA staffing shortage. While OHDS staff members and offices perform necessary AoA functions (utilizing AoA's staff slots), expanding responsibilities under the OAA require expanding (not contracting) core AoA staff with direct OAA administrative responsibilities. There also is an additional layer of authority (OHDS) which, in itself, has generated significant reporting demands on AoA staff.

Thus AoA's location within another governmental unit, and its attendant constraints, may well account for a number of the reporting system inadequacies presented in the report. As in the discussion of AoA staffing cut backs, the authors would point out that either

OHDS needs to resolve these problems by (a) taking direct staff responsibility for program accountability in the broad and narrow senses of the concept, or, preferably, (b) enhancing AoA's own staff capability in this crucial area for program management.⁴⁹

4. CONGRESSIONAL-ADMINISTRATION PERSPECTIVES: AN UNEASY COMPROMISE

The analysis presented shows the paperwork generated in AoA's reporting system to be deficient in terms of (1) appropriateness and usefulness for high level policymaking, (2) providing clear-cut specifications of the expectations for SUA and AAA effort and anticipated outcome, and consequently in (3) performance evaluations.

Part of the reason for the lack of clarity regarding OAA agency expectations must be attributed to differences in legislative and executive branch strategy-preferences for ameliorating problems of the Nation's elders. The accommodation of these divergent (and perhaps incompatible) problem-solving orientations occurs not only within the framework of one single act, but also even within component strategies of a single title, title III. As noted, some of these accommodations are contradictory in that they are not likely to be jointly attainable (e.g., rational planning and responsiveness to citizen demands). Current OAA objectives reflect these unresolved tensions between two of the three Federal governmental branches.

Disparate congressional and administration views are exemplified in two concrete legislative instances: (1) the 1972 and 1973 OAA amendments, initiating respectively title VII (a categorical type, direct-service meals program of congressional interest) and title III (block grant type, broad-aim, nondirect-service, coordinating strategy of Nixon-Ford administration interest); and (2) the congressional imposition of priority services under title III of the 1975 amendments.

Both cases demonstrate the incorporation of dual orientations in the same enactment. Based on administration emphasis on developing comprehensive coordinated service systems, title III (with the exception of the 1975 priority services) can be expected to be relatively long-term in whatever impact it creates via planning, coordination, and program development. Conversely, the congressional portions of the OAA (title VII and the 1975 amendments on priority services) aim at more direct, visible and short-term outcomes (e.g., the service provision of relatively immediate impact on the lives of older people).

The competing OAA emphases represented in these divergent congressional and administration perspectives naturally create severe demands on any accountability systems which are developed. Existing AoA reporting systems have tended to emphasize short-term highly quantifiable numbers data. The long-run effects of the program are not being tapped. Undoubtedly the emphasis on short-run program tracking has occurred for two very cogent reasons: (1) that political necessities call for demonstration that the act directly benefits people under title III;⁵⁰ and (2) that it is very difficult to develop standards

⁴⁹ This will require first, the augmentation of central AoA staff size to alleviate critical personnel shortages in all aspects of agency responsibility; second, the initiation of hiring practices and organizational incentives which assure the selection of a highly competent policy research and evaluation specialists; and third, the institution of a program of staff development which increases AoA capacity for national level monitoring and evaluation.

⁵⁰ Such issues of accountability take on unique and urgent configurations at the State, area and project levels where program operations are daily called into account. At these levels the perspective is immediate and focused on demonstrable impacts within limited time frames.

and measurable objectives for reporting on the broad-gauged, multi-causal comprehensive title III approach.

Thus the political necessity of demonstrating immediate short-term effects results in the consequent de-emphasis on the long-range indirect attainments of the title III effort. *This is extremely likely to (1) encourage AAA's to shift their emphasis to whatever short-term outputs are being measured regardless of their long-term consequences, and (2) relieve AAA's from being required to demonstrate accomplishment in essential areas of their work, as little in the accountability system addresses the types of activities and accomplishments which comprise the mandated long-range objectives of the act.*

5. THE "AGING NETWORK" AND PAPERWORK PROBLEMS

Reference to the "aging network"⁵¹ figures significantly in material released from AoA and the Congress. The term is used to denote the arrangement of titles III, VII, and now title V agencies throughout the Nation. The network concept connotes relatively stable, smoothly functioning interconnected administrative structures specifically designed and peculiarly adapted to the implementation of the programs and mandates of the Older Americans Act.

The current image of the network seems to be one of an elaborated set of interorganizational relationships with clearly differentiated roles and responsibilities resulting from the rational devolution of authority and power from the national to local levels. In actuality, the network, with its multiple constituent agency units representing a variety of geographical and political perspectives, is fraught with jurisdictional disputes as well as competing and conflicting interpretations of their respective responsibilities. The more than 3,000 agencies funded under titles III and VII alone are extremely heterogeneous; this network is administratively and politically decentralized, and lacks both jurisdictional and programmatic unity at the National, State, and sub-State levels.

One central issue is that the growing acceptance and usage of the network concept obscures the very diversity and internal cleavages which are the source of many of the accountability and paperwork problems reported here—difficulties which emanate from the multiplicity of actors and units, the complex communication involved in disseminating and retrieving information throughout the network, and the time involved in clarifying ambiguous policy statements and instructions—each of which contributes to inconsistent interpretation or misinterpretation of policies and information requests at all levels.⁵²

⁵¹ The major OAA program objective of the last 3 years is often described as the creation of what AoA calls an "aging network" to help the elderly. As such, it is the identified advocate for senior services and programs at the State and sub-State level. The coinage "aging network," however, is misleading because it implies a network of elders—when older persons are largely excluded both from employment in and policy-making for titles III and VII agencies. Employment of the aged in OAA agencies, particularly AAA's, is severely restricted due to civil service and private sector retirement policies. Further, Federal regulations for the OAA specify that civil service requirements may not be abridged where they exist. Concerning the advisory (not policy) roles of the aged, see William E. Oriol and C. L. Estes, "Symposium on Citizen Participation by the Elderly in Programs Meant to Serve Them," presented at the Gerontological Society, Louisville, Ky., October 1975.

⁵² Another concern is that widespread use of the network concept provides the comforting appearance of far more organizational and advocacy development than actually exists in the Nation. As such, continuing use of the term may detract from the significant remaining work necessary for the creation of a nationwide network which not only links service and governmental units vertically and horizontally but, more important, which is seriously representative of older persons and their coalitions of local, State, and National associations.

An example of this phenomenon is shown in the issue of integrating title III and title VII at the AAA level where multiple perceptions about roles, authority, AoA policy, and about the intent of the Act are reported to have delayed effective program implementation and integration by some study respondents.

The aging network cannot be treated as an elaborate administrative apparatus. It is by nature inherently diversified and composed of thousands of independent entities, each of which is subject to constraints and requirements stemming from their respective jurisdictional and organizational locations. As such, the independent (and not always interdependent) units of the network are individually and jointly subject to stress and strain from within and without. The ability of this multitude of agencies to handle the complex information flow and reporting demands required by the Older Americans Act (related issuances, reporting, and review and comment procedures) should be examined in full recognition of these complexities. A realistic appraisal of this problem must be incorporated into any solutions which may be devised in response to issues raised in this report.

CONCLUDING NOTE

A number of proposed bills to reduce Federal paperwork have sought to decrease reporting requirements by concentrating accountability responsibilities in the Office of Management and Budget (OMB). It is argued here that assigning OMB the responsibility for maintaining accountability will not solve the paperwork problems attendant to OAA programs and agencies.

The over-reliance on OMB in efforts to reduce the paperwork burden could very well result in further centralization and reduction of potentially informative data—exaggerating the tendency to truncate (and thereby distort) information. Judging by past performance, OMB's propensity would be to emphasize the discrete, quantifiable, and simplified information which this study has demonstrated is primarily an artifact of the reporting process, and which portrays neither the essence of activity nor an accurate view of the problems of and potential for program achievement.

This study undertaken for the U.S. Senate Special Committee on Aging has identified and documented a number of problems regarding the quantity and quality of the paperwork burden associated with the Older Americans Act. It is hoped that this report will contribute toward constructive changes within the OAA programs working throughout the Nation to help older persons live more satisfying lives.

Part 2

METHODOLOGY AND ANALYSIS OF THE PAPERWORK BURDEN

The initial objective of the paperwork study, U.S. Senate Committee on Aging, was to develop a simple descriptive research project designed to identify undue paperwork burdens and to examine the basic data acquisition system of the Older Americans Act (OAA) title III and VII agencies with respect to the reliability, validity and utility of the data collected. However, after completion of the interviews with selected SUA and AAA staff and an initial examination of the data collection systems and AoA compliance reports and documents, it became evident that merely counting pieces of paper would not adequately reflect the extent of the paperwork burden affecting more than 3,000 OAA agencies. The objective of this study was not only to describe undue paperwork burdens but more importantly, to develop a critical analysis of the planning, monitoring and assessment system. We did not, of course, abandon the premise that some paperwork is necessary to efficient program operation.

This paperwork report is based on an exploratory study designed to (1) increase familiarity with the phenomenon of paperwork burdens, (2) clarify concepts and problems involved in paperwork, and (3) identify priority issues to be pursued in a more systematic analysis.

The analysis of the paperwork within OAA agencies relied on two major sources of data:

(1) A series of 20 interviews completed with staff members working in OAA agencies at all levels (SUA, AAA, title VII and AAA sub-contractor), drawn primarily from one large State.¹

(2) Data on the volume of information, direction of flow and content analysis developed from a close and systematic review of the identified major documents required of and by the OAA agencies. The primary focus was to identify documentation necessary to meet the most basic paperwork requirements.

In developing the information for the tables, all of the requisite documents were reviewed in a detailed content analysis. For documents such as State plans, three representative completed documents were selected and an average of the three was taken for the volume of "data prepared on the forms." In this way an average data count was developed. Analysis of complete plans was undertaken to identify variations in types of information and categories of information specified in various formats. This analysis allows for greater credibility in identifying assessment and evaluation information (as developed in the various document formats) and yields greater validity in the coding of this information.

¹ A smaller number of staff from two other States were interviewed to verify major points expressed in this report.

Four categories were developed for this analysis of paperwork:

- (1) The volume and direction of the paper and information flow.
- (2) The nature of the flow, types of information (e.g., fiscal, descriptive) and categories of information (e.g. administrative, social services).
- (3) The purpose and uses of the information.
- (4) Problems that arise from time lags and the magnitude and variability in the range of agencies and programs reporting within the system and involved in generating data.

There are many paperwork horror stories circulating in the agencies studied, ranging from accounts of multiple changes in application deadlines to reports of being required to rewrite an area plan due to the absence of "active verbs" in the objectives. Consequently, we found it difficult to develop recommendations and issues from interview data alone, data so susceptible to criticisms of being unduly idiosyncratic or focused on transitory problems.

To develop a data base on "paperwork" and a data collection system which would be useful in identifying major problems and trends in the "paper flow system", it was necessary to develop a profile of the major compliance reports and documents required of OAA agencies. Only then is it feasible to discuss a range of problems and suggested solutions, within both the parameters of the Commission on Federal Paperwork's study and the larger context of the design, implementation and impact of the Older American's Act of 1973, as amended.

A. MAJOR AoA COMPLIANCE DOCUMENTS

The summary volume data shown in tables 1 and 2^{1a} represent the minimum volume (number) of pieces of paper to be filled out annually with required information by the OAA agencies. These documents represent the major compliance and contracted reports required of the State unit on aging, the area agency on aging, the nutrition projects, and the area agency subcontracts for direct services. It should be emphasized that these charts exclude most, if not all of the miscellaneous, lateral and other supporting in-house documents, reports and paperwork required for normal agency operation. Table 4^{1b} illustrates the types of in-house reporting systems that are required if reliable data are to be collected for the normal monthly, quarterly and yearly reports. In conclusion, the paper being counted in these three charts is the paper directly generated in response to reporting requirements of the OAA agencies planning, monitoring, and assessment systems.

Data were compiled to provide an overall picture of the volume of paperwork generated within the OAA agencies, and the directions in which the paper and data flow. The most frequent complaint from respondents within the OAA agencies was "we spend all our time handling paper." The first characteristic of the system to be documented in our study was the sheer volume, the "upward flow" and "hierarchical" nature of the paperwork system.

THE HIERARCHICAL ORIENTATION OF THE PAPERWORK SYSTEM

The nature of the paper flow within the aging agencies is upward, while major policy issuances and instructions flow downward to the

^{1a} See pp. 36-40.

^{1b} See p.41.

local service provider. As shown in the tables, the basic data on the OAA programs are being developed and collected at the local level. It is also evident (and respondents verified) that the reporting burdens do not decrease relative to the size of the grant. At the level of the direct service contracts, there are few dollars for administrative support staff; in fact, staff at this level are often part time and predominantly paraprofessional, yet they bear a large segment of the reporting burden. Many respondents interviewed felt that they spent more than one-third of their time maintaining their reporting systems, handling information, following the paper flow, etc. Other respondents reported that the "paperwork" at this level of direct service provision creates disincentive for potential applicants. They reported that the emphasis on separate recordkeeping was inappropriate for the small and time limited title III service contracts, and that the requirement to report on units of services, coordinating activities, pooling, consumer participation, etc., for only \$7,000 for example, was simply not worth it.

Given the amount of data collected at the bottom of the pyramid of OAA agencies, predictably, some is lost as the information is sifted and translated up to the top decisionmakers. On a 1-to-1 basis, program for program, the reporting requirements at the bottom are not appreciably less in terms of absolute volume than at the top. In other words, a small \$20,000 contractor experiences almost as much of a reporting burden as the local \$50,000 AAA, and they in addition, have to keep services flowing. Also, if they are to have reliable data for their reports, they must maintain a massive in-house paper system. The title VII chart illustrates this problem for the service providers (see page 38).

B. THE AoA ISSUANCE SYSTEM

There is a large flow of information and paper from AoA into OAA agencies much of which was described by its recipients as not immediately relevant to program operations but all of which had to be stored for retrieval. The top down quality of this paper flow from AoA and other agencies is described by respondents as fragmented, often open to misinterpretation and in general a burden for the staff to handle. A review of table 4^{1c} illustrates that independent of the SUA, AAA, or VII agency issuance system, at least four sets of issuances originate with central AoA. These are the PI's, TAM's, IM's, and OSCP's.² Additional paper flows into the system largely from the technical assistance material prepared under contract to AoA and distributed nationwide. Thus, one problem in the paperwork system of OAA agencies and their subcontractors is the necessity to store and retrieve vital information that is distributed in an ad hoc incremental fashion, and which may require changes in complex and lengthy guidelines. Table 4 contains a listing of the varied types of issuances being sent into the system and the problems an OAA agency faces tracking the incoming information in-house.³ The organization and tracking of the information is critical when regulations are changed. Responses are required, laws and rules are interpreted. Sheer volume represents an information management burden on small AAA's, SUA's

^{1c} See p.41.

¹ "PI" refers to "Program Instructions;" "TAM" refers to "Technical Assistance Memoranda;" "IM" refers to "Information Memoranda;" "OSCP" refers to memoranda from the AoA Office of State and Community Planning.

² The cost associated with reading and absorbing the information in these issuances is another major problem not sufficiently emphasized in this report.

title III subcontracts, and title III agencies; and expectations regarding data and information management remain constant. Scarce resources are rapidly depleted in agency efforts to manage and monitor the paper containing issuances.

The volume and scope of the AoA Issuance System has implications beyond its sheer size alone. *Each piece of discrete information that is distributed throughout the system generates additional paperwork at every level.* The costs of such a system extend far beyond the paper, particularly considering the *enhanced potential for misinterpretation and error* fostered by an information flow of this magnitude. Major issuances can require up to 5,775 copies for each single policy statement.⁴

Based on 1 year's indices, an average of 44 AoA policy statements (PI's) are generated per year. At an average annual total of 318 pages, the cost of distributing this policy information is \$64,276 for copying and \$26,808 for mailing and envelope costs (see table 5).⁵ The resulting total cost of \$91,084 excludes staff costs involved in preparing the written material, in receiving, copying, redistributing, storing, and reading the information at the local level. Finally, it must be emphasized that we have not included the tremendous copying costs for multiple copies at the SUA, AAA, VII, and subcontractor levels as well as the agencies with which they interact. Other incalculable costs include the staff time involved in clarifying such policy issuances. For every Federal policy that requires further clarification, an additional 2,361 copies at a minimum have to be prepared and distributed to OAA agencies.⁶

For example:

If a policy statement were released defining SUA/AAA granting authority under title IV-A which then required a four-page followup clarification, it would cost an additional \$808 for copying and \$609 for mailing the new information. This would not take into account the cost of communicating with thousands of potential local grantees who would need to be similarly informed.

Using this example, a total cost of \$1,417 for clarifying information to be distributed can be chalked up every time a confusing policy statement is released or a question is raised at the local level, or a policy is questioned or a dialogue is developed which depends on the maximum utilization of OAA agencies for information distribution.

If only one set of AoA issuances were released per month using the current communication network, and the average release was four pages, it would cost \$9,702 for the copying costs and \$7,312 for the mailing costs.

Beyond the extent of the dissemination network, the number of intervening layers between the source of the policy and its recipients, additional program costs are incurred by the time lags in implementation, time lags created by communication which often requires clarification and followup. The necessity of Federal, State, and local inter-organizational communication is not to be discredited. However, the costs incurred by overreliance on such information dissemination system must be examined.

⁴ See table 4, row 1 (AoA PI's), column 14 (total number copies, original page for PI distribution Network).

⁵ Table 5, p. 41, row 1 (AoA PI's), column VIII.

⁶ See table 4, row 2 (AoA IM's), column 14 (total number copies per original page for IM distribution network).

GENERAL OVERVIEW OF "PAPER" IN A SAMPLE AGENCY

The paperwork burden is most graphically illustrated by figure 2 which describes the contents of one desk in an SUA regional branch office. Multiply this by 50 SUA's or 500 AAA's. The Senate researchers undertook one day to go through the files, shelves, drawers, of an SUA office in order to identify the types of paper being managed in the system. First, we observed numerous duplications of AoA, PI's, IM's, and TAM's, far exceeding the minimal estimates for the issuance distribution. Staff reported that due to the complex nature of the guidelines and the problems in tracking information, they each kept their own copies of what they guessed would be important for present or future use.

Second, we noted the different value (weight) attributed to different components of the system (i.e., IM's, PI's, TAM's). These and other pieces of paper flow in at such a rapid rate that the most staff could do was respond to priority or critical issues. Most of those interviewed indicated there was no time to look at a IM or TAM unless it was immediately and directly relevant to their current work. PI's on the other hand, received attention, given the policy requirements contained in them.

FIGURE 2.—Contents of "miscellaneous" desk in sample State Office of Aging

October 28, 1976 (Time spent counting and identifying material: 2 hours).
Desk Drawer file: 37-40 files of nutrition project weekly interim reports, 1974-1976.

In-Baskets:

First basket—intraoffice memoranda:

31 pages—Copies of budget schedules, local maps, I & R information.

Second basket—Copies of quarterly nutrition report:

103 pages—Social security survey, memoranda to Title VII & AAA personnel, I & R monthly data report, intraoffice memoranda, letters and attachments.

75 pages—Empty file folders, pad of paper with notes, Senior Citizen Centers file.

Total for content of "in-baskets," not including pages of all attachments: 209 pages.

Stacks of material and individual pages on desktop:

<i>Material</i>	<i>Number of pages</i>
Handbook for Site Operations-----	258
"Geographic Relations of Senior Citizen Centers to Nutrition Project Sites—Los Angeles City and County"-----	76
Nutrition project weekly reports and blank forms-----	113
Quarterly nutrition reports-----	132
Nutrition project weekly reports-----	18
Do-----	24
Do-----	38
Do-----	20
Miscellaneous separate loose pages (job announcements, letters, reports)-	64
Total -----	643

Standing files:

First file—nutrition weekly report totals.

276 pages—Binder with questionnaire responses and background correspondence on project participation, 1975-76; project report on "Environmental Impact of Principal Transportation Alternatives".

Second file—1975 contract documents.

925 pages copies of statistical reports, forms. Manual of Policies & Procedures (State Office of Aging's); Binder of contract transmittal letters, forms; binders contract information.

Total, standing files: 1,201.

All paper on "miscellaneous" desk, not including individual pages in files in desk drawer : Total: 1,853 pages.

The information found represented primarily OAA agency business. Little or no material addressed the State plan, or the achievement of State objectives. Staff in this SUA regional office indicated they had little to do with the State plan; their primary activity concentrated on the ongoing implementation and monitoring of AAA and VII subcontracts. Just getting the minimum required business done was enough.

C. PLANNING

One of the major activities mandated by the Older Americans Act for both SUA's and AAA's is ongoing planning. Over the past 3 years, since the 1973 amendments, a tremendous effort has been invested in defining planning both in technical assistance material distributed from the Administration on Aging, and in the basic guidelines and instructions to SUA's and AAA's for filling out their area plans. The technology of planning has been given tremendous coverage in the literature from every point of view: (1) Advocate planning; (2) involvement of consumers and providers of services in planning; (3) developing priority listings; (4) planning for program development and maximum utilization of existing resources; (5) long-range planning versus short-term planning; and (6) the role of needs assessments in the planning process.

Table 6—attachment A outlines a planning process recommended for use by AAA's in developing their area plans. A flow chart outlining this recommended planning process, including objective setting and monitoring procedures, is illustrative of the model⁷ (see table 6, p. 43, attachment B).

As shown, planning requires a priority needs analysis chart, an analysis of alternative methods of identifying needs, and criteria for selecting the best approach in choosing alternative courses of action to solve problems. Table 6 illustrates the effort and paperwork which may be generated by conscientious adherence to the OAA mandate to plan by identifying the major steps in the planning process and the major activities required to complete these steps. Table 6 also identifies those planning products which appear in the area plan, those activities in which the advisory council is ideally involved, and those planning steps requiring the preparation of documents.

It is clear from a cursory review of this planning chart that at each step of the process, AAA and SUA staff are involved in preparing, circulating, and integrating comments and data on needs, resources, priorities, and program objectives. Theoretically, the planning process is by its nature a two-cycle process with the first cycle focused on needs analysis, resource inventories, and an analysis of alternative courses of action. Once objectives have been set, the major planning function could feasibly be limited to monitoring the achievement of objectives and the extent to which they meet the identified needs. The monitoring process would and should produce the data required to restate or alter the major program objectives.

⁷ "Objective Setting and Monitoring," Kirschner Associates (Washington, D.C.: DHEW, 1975), Pub. No. (OED) 76-20204).

The in-house capacity of the SUA's, AAA's, subcontractors and title VII providers to creatively identify and respond to priority problems in the field requires a capacity to document and circulate among key decisionmakers issue papers, memos, and other pertinent documents. While the flow charts outlining the planning process and the subcontracting/monitoring processes reflect this in-house burden, it is difficult to quantify in terms of actual paper generation or program costs.

An illustration of the paper flow attendant to only one aspect of the planning process is exemplified by the process in which the area plan or title VII application are reviewed by advisory bodies. There are 536 AAA advisory councils and 809 title VII advisory councils. This represents a total of 1,345 advisory councils with a major role in reviewing and commenting on title III plans and title VII plans. If each council has an average of 15 members, the result would be a total of 20,175 individual advisory council members. If staff prepares 75 pages for area planning review and comment procedures and elicits from the advisory councils just one page of comments per member per planning step, the result would be a flow of paperwork as follows:

- Pages from staff to the advisory committee—1,513,125. (This represents 75 pages distributed to 20,175 advisory committee members on a national basis.)
- Comments from the advisory committee to staff—121,050 pages. (Six pages per advisory committee member.)
- The total pages involved in the process—1,634,175.

Thus to prepare, distribute, and gather comments on the area plan requires a total of 1,634,175 pieces of paper which at a cost of \$.035 per copy represents a total cost of \$54,196. This cost does not take into account the time involved in preparation of the materials, discussion by the advisory councils, and the transcription of comments.

SUMMARY COSTS FOR PAPERWORK IN LOCAL PLANNING PROCESS

Table 6 outlines the paperwork burden generated by strict adherence to the model of planning outlined in the area plan. Were an AAA to invest additional efforts in detailed needs analysis, the costs and volume of paperwork in the systems would increase probably 10 fold. This level of planning (and the total pages of originals generated by each step in the process) does not fully represent the required effort and staff allocation to complete the planning process, yet the result of this minimal effort is in itself staggering.

As outlined in table 7,⁸ costs are \$67,779 to meet the most minimum planning requirements.⁹

D. OTHER SOURCES OF PAPERWORK

While most of the tables have documented the paperwork generated by major activities required under the Older Americans Act, respond-

⁸ See p. 46.

⁹ Planning may imply little or no actual activity beyond data development and manipulation; no data are presented on the process by which activities are achieved or clarify actual goal attainment. All these data and paper therefore are essentially devoted to intentions of planning instead of actual outcomes of planning.

ents projected that at least an equivalent amount of information and paper (if not more) is required in-house for each agency. The in-house reporting requirements range from the normal daily correspondence to obtain interagency cooperation, clarification of policies and program data, to the drafts and rewrites of the State and area plans as required by SUA and AoA regional offices, respectively.

Sources of in-house burdens not enumerated in the previous sections on compliance documents and the issuance system are:

1. CORRESPONDENCE AND REQUESTS FOR INFORMATION FROM THE GENERAL PUBLIC

(a) In one SUA regional office, the correspondence control files contained approximately 1,200 inquiry letters for 1 year which had required that office's reply. This file held only the actual carbon of letters sent out of the office and does not represent any attachments required. This represents an average of 100 letters per month for only one of three regional offices in one large State. (b) A brief content review of the SUA correspondence received in a simple SUA revealed that a major portion of the requests for information and assistance are from political figures; a substantial number are general public type requests for information about programs; other major categories of letters contain specific concerns, e.g., funding appeals, complaints, and questions about funding allocations. The letters were not insignificant and the responses to each letter reviewed took an appreciable amount of staff time.

2. UMBRELLA AGENCY REQUESTS FOR INFORMATION

Many SUA's and AAA's are housed within larger agencies (e.g., Health and Welfare Organizations). These agencies have their own reporting requirements, budgetary procedures, and systems of document preparation. In one SUA studied, the reports required by the umbrella agency were separate reports requiring additional staff. In this case, the OAA reporting system met few (if any) of the in-house reporting needs.

While actual figures are not available for these umbrella agency reporting requirements, respondents indicated that they probably generated about 200 pages per year for the SUA of final copy original pages. Although State and locality reporting requirements may not be outrageous in and of themselves, they represent just one more aspect of the often duplicative data gathering and document preparation (i.e., paperwork) in the overall system of accountability and monitoring for agencies created under OAA. Simply stated, the OAA documents do not meet lateral reporting needs.

3. STATE LEGISLATIVE INFORMATION DEMANDS AND PAPERWORK

Under the OAA, every SUA requires enabling legislation or an executive order to create the mandated single State agency. To the extent that the State legislature invests funds beyond their match into the SUA administrative structure, additional responsibilities may be required of the SUA and/or local AAA's. At least yearly, SUA's must

prepare and submit to their Governors, legislators and/or executive departments progress reports which are prepared in narrative form. Additional requests for information from State agencies and the legislature have been received as frequently as quarterly. Most SUA's have found that the reporting system required by the Older Americans Act cannot be copied and used to meet these requests. While some of the data is available, respondents often had to invest additional energy and time in preparing these reports.

4. PAPERWORK DEMANDS WHEN TITLE III AGENCIES WORK WITH OTHER PROGRAMS

For every additional program (e.g., title V, title IV-A, Model Projects, title XX, UMTA) that an SUA or AAA is involved with, there is an increase in reporting requirements and the overall paperwork burden. For example, due to the confusion that existed regarding application procedures for title V, numerous local contractors developed applications of up to 50 pages for grants which could return a mere \$4,000 annually. This paper had to be collected, reviewed and forwarded from the SUA to the AoA.

While accountability for all programs must be maintained, respondents reported that a major problem was the lack of uniformity regarding required information and formats in different reports and the increased monitoring and reporting burdens placed on staff.

E. SUMMARY ISSUES

Analysis of the paperwork burden within OAA agencies raises a series of key issues:

(1) In analyzing two sample AAA budgets the proportion of money spent on supportive services and gap filling services amounted to between 40 percent and 60 percent of their total budget. The diminution of funds from the administrative, planning, coordination and pooling (SUA/AAA) level to the direct service level (sub-PSA) does not appear to support the reporting burdens which accompany direct service grants.

(2) There appears to be a general lack of awareness of the multiplier effect on paperwork which a large national network of OAA agencies, spanning Federal, State, and local jurisdictions represents. One predictably negative effect is that the paper flow inadvertently creates serious time-lags in disseminating and gathering information from the multiple layers represented by these agencies. The costs (fiscal and program delay) of paper flow through OAA agencies are sufficiently high to urge the most cost effective and cost efficient utilization possible.

(3) The volume of paper flow through and within OAA agencies reportedly has augmented (instead of alleviated) the problem of interpreting complex regulations and guidelines. While a uniform mode of distribution appears to exist, given the volume of information currently flowing up and down the system, the misinterpretation and misapplication of new information is highly likely.

To treat the multitude of OAA agencies as one smoothly operating system ignores key junctures in the decisionmaking processes which

reflect the basic (and different) jurisdictional responsibilities of different OAA agencies. The information "access" to different layers of OAA agencies should support the respective jurisdictional responsibilities of the different State and local agencies in order to prevent information misuse and abuse. Unfortunately, AoA issuances have been released simultaneously throughout the distribution network of SUA's, AAA's, VII, III subcontractors and interested public. The result is that local title VII subcontractors may receive information before the SUA, and the SUA may receive information before the regional AoA office. The current AoA information distribution system often undermines appropriate roles and authority for specific agencies in clarifying and implementing policies.

In all cases, major policy changes instituted by AoA requiring an agency's effort (e.g., SUA) should be distributed to that unit with a sufficient time gap to permit their obtaining needed clarification prior to the distribution to other OAA agencies. Ambiguities and confusion within a varied system of this type produce anger and hostility, restrict the ability of administrative and policy level staff to respond to requests for clarification, and reduce the legitimacy of major focal points such as SUA's and AAA's vis-a-vis their sub-State and local entities.

(4) Another key issue concerns the process of planning and decision-making regarding the allocation of scarce resources.

The Older Americans Act agencies (OAA agencies) are a complex arrangement of organizational units designed to facilitate community and local input into the overall planning process.

The participation and utilization of the OAA agencies in a locality based planning process is an expensive administrative activity. If scarce resources are to be invested in this manner, the products and legitimacy of the process must be examined; OAA agencies' commitment to advisory participation beyond pro forma ritualized review and comment deserve serious consideration here and elsewhere.

What is the point of a rational planning process when local priorities derived in the planning process are often subverted as a consequence of larger political processes (e.g., the priority services under the 1975 amendments) and local fiscal, administrative, or jurisdictional considerations? The question concerns the extent to which extra planning considerations are an expected part of the process and the extent to which the emphasis on the technical planning process is viable in view of these political realities.

Some critics have asked: "Why redo the technical and detailed portions of the planning process year after year? After 3 years there should be sufficient primary data for needs analysis; priority needs should have been identified and resource analysis completed." These critics claim that planning (contrary to its outline in the area plan and as reflected in much of the technical assistance material on objective setting and planning) is not, nor should be the completion of the same repetitious technical activity year after year. Other critics claim that if so many title III resources are going to be invested in area planning, the plan that is produced should address more than just the title III allocations—it should address all aging programs.

If the AAA planning process is largely unrelated to the major decisionmaking processes affecting local resource allocations and priority

programs (those not represented among title III allocations), then it should be reduced to the absolute minimum of administrative planning. To invest this effort, time and money in producing the area plan (which most respondents call a basic compliance and administrative monitoring document) appears an overinvestment in planning for a very small sector of support.

APPENDIX TO PART 2
TABLE 1.—I. YEARLY SUMMARY VOLUME CHART

	Received by—	Volume				Multiplier (number of agencies)				Total	
		Number per year per unit	Number of pages	Number of pages of originals	Number of copies for review process	Total pages of copies	SUA	AAA	VII	III sub-contracts	Total pages of original
MAJOR COMPLIANCE DOCUMENTS											
I											
SUA plan (yearly).....	AOA RO ¹	1	113	113	20	2,260	56			6,328	126,560
SUA quarterly report, progress and performance.....	AOA RO	4	8	32	4	128	56			1,792	7,168
SUA monthly fiscal report.....	AOA RO	12	3	36	4	144	56			2,016	8,064
SUA assessment (yearly).....	AOA RO	1	106	106	1		56			5,936	
SUA objective assessment (quarterly).....	AOA	4	10	40	1		56			2,240	
AOA regional office assessment report of SUA (quarterly).....	AOA	4	13	52	4	208	56			2,912	11,648
SUA subtotal.....										21,224	153,440
II											
AAA plan (yearly).....	SUA	1	89	89	4	356		536		47,704	190,816
AAA quarterly report, progress and performance.....	SUA	4	14	56	3	168		536		30,016	90,048
AAA monthly fiscal report.....	SUA	12	2	24	4	96		536		12,864	51,456
AAA assessment (yearly).....	SUA	1	69	69	1			536		36,984	
AAA subtotal.....										127,568	332,320

III

AAA SUBCONTRACTING PROCESS
AND MONITORING PROCESS *

Awards procedures preapplication process	AAA	1	42	42		2,144	90,048		
Narrative	AAA	1	51	51	6	306			
Awards monitoring of project, monthly fiscal report	AAA	12	5	60	4	240	2,144	128,640	
Site visit assessment	AAA	1	8	8	2	16	2,144	17,152	
Objective assessment	AAA	1	2	2	2	4	2,144	4,288	
Quarterly report, performance	AAA	4	2	8	4	32	2,144	17,152	
AAA subcontracting and monitoring (subtotal)							366,624	1,282,112	

IV

AAA project's in-house documentation systems ³ (subtotal)							3,666,240	
AAA subcontracting and monitoring (total)							4,032,864	1,282,112

¹ Regional office.

² The figures were developed assuming a minimum of 4 applications/projects per AAA.

³ Title III project's in-house documentation systems estimate was developed using the title VII

in-house documentation system as a model. In title VII, the ratio of in-house reports necessary to produce the major compliance reports was 28 to 1. For title III a ratio of 10 to 1 was developed based on a "best estimate."

II. YEARLY SUMMARY VOLUME CHART—TITLE VII

	Received by—	Volume				Multiplier		Totals		
		Number per year per unit	Number of pages	Number of pages of originals	Number of copies for review process	Total pages of copies	Number of projects	Number of sites	Total pages of original	Total number of copies
V. TITLE VII¹										
VII application.....	SUA/AAA	1.....	50	50.....	6	300	809.....		40,450	242,700
VII quarterly report.....	SUA/AAA	4.....	5	20.....	4	80	809.....		16,180	64,720
Monthly fiscal report.....	SUA/AAA	12.....	1	12.....	4	48	809.....		9,708	38,832
Title VII assessment.....	SUA/AAA	1.....	69	69.....			809.....		55,821	
Major compliance documents (subtotal).....									122,759	346,252
VI. SUPPORTING DOCUMENTS TITLE VII¹										
IN-HOUSE REPORTING										
Reservation sheet/sign-in.....	VII	1 per site day.....	1	260.....	2	520		6,145	1,597,700	3,195,400
Intake form.....	VII	do.....	1	50 per site.....				6,145	307,250	
Characteristics worksheet.....	VII	1.....	1	1.....			809.....		809	
Participant log.....	VII	1 per participant.....	1	50 per site.....				6,145	307,250	
Kitchen meal delivery form.....	VII	260.....	1	260.....				6,145	1,597,700	
Daily food cost.....	VII	260.....	1	260.....			809.....		210,340	
Monthly site worksheet for meals.....	VII	12 per site.....	1	48.....				6,145	294,960	
Service logs.....	VII	1 per mo.....	1	12.....	2	24		6,145	73,740	147,480
In-house subtotal.....									4,389,749	3,342,880
Title VII projects (total).....									4,512,508	3,689,132

¹ Estimates are based on a sample VII project with an average of 260 meals per day and 4 sites.

ATTACHMENT A (TABLE 1)

Explanation of Categories: Summary Volume Charts

Received by: This indicates the organization which receives and accepts the reports.

Volume:

Number per year per unit: This indicates the number of times a given document or report must be prepared per year.

Number of pages: This is the number of pages in the original report/document.

Number of pages of originals, total: This is total number of original pages to be prepared yearly. (ex 4 pages of a quarterly report would equal 16 pages of original report per year: $4 \times 4 = 16$).

Number of copies for review process: Number of copies of original required by application or review process. These numbers represent only the absolute minimum final submittal copies. This does not take into account rough drafts and extra copies.

Number total pages of copies: This is total pages of copies derived from multiplying total copies \times total originals.

Multiplier: This gives the number of units that must prepare the report per year.

Total pages of originals: Total pages of original \times number units preparing report.

Total number copies: Total number copies per unit \times number of units.

ATTACHMENT B (TABLE 1)

Summary list of compliance documents

- | | |
|--|---|
| I. SUA plan----- | This is the yearly plan required of the SUA by AoA. |
| SUA quarterly report. | This is the quarterly progress and performance report submitted to AoA by the SUA. |
| SUA monthly fiscal report. | This is the monthly fiscal report from SUA to AoA. |
| SUA assessment... | This is the assessment tool completed by AoA on each SUA once yearly. |
| SUA objective's assessment. | This is the portion of the assessment tool completed on a quarterly basis by AoA regional on each SUA. |
| AoA regional office assessment report. | On a quarterly basis the AoA regional office is required to submit in writing a report to the SUA and AoA on the portions of the assessment tool completed to date. |
| II. AAA plan----- | Yearly plan submitted by the AAA to the SUA. |
| AAA quarterly report. | Quarterly progress and performance report required by SUA to complete their quarterly report. |
| AAA monthly fiscal report. | Monthly fiscal report and request for funds. |
| AAA reassessment. | Yearly assessment completed by SUA on each AAA. |
| III. AAA subcontracting process. | This refers to the in-house system developed by each AAA for subcontracting title III funds for direct service projects. |
| Preapplication process. | As outlined in the ABT materials this would be initial resource evaluation and inventory of services with potential subcontractors. |
| Narrative application. | This would be the application submitted to the AAA by the potential subcontractor. |
| Awards monitoring. | Procedures established by AAA to monitor and assess subcontracts, and generate information for required reports to SUA and AoA. |
| Monthly fiscal.... | Monthly report on expenditures and request for funds. |
| Site visit----- | Yearly site visit and assessment of contracts. |
| Objective assessment. | Yearly closeout assessment of achievement of stated objectives in contract. |
| Quarterly report... | Quarterly report to the AAA on progress and program performance. |

IV. Title VII application.	Application for funds submitted to SUA or AAA.
VII quarterly report.	Quarterly report on performance and progress to SUA/AAA.
Monthly fiscal	Monthly report on expenditures and request for funds.
VII assessment	Yearly assessment completed by contracting agency.
V. Reservation sheet/sign-in.	Basic data on participant attendance in program.
Intake form	Basic data on participant characteristics and problems.
Worksheet	Worksheet developed to assist projects in integrating data.
Participant log	Individual attendance logs for all participants.
Kitchen meal delivery form.	Receipt of food and basic accounting form for meal delivery.
Daily food cost	Form for calculating on a daily basis meal costs.
Monthly site worksheet.	Worksheet for site coordinators to complete for project director's use.
Service logs	Records of social services.

TABLE 2.—NATIONAL YEARLY SUMMARY VOLUME CHART

Document sources	Total number of pages	
	Original (A)	Copies (B)
I. SUA (see SUA summary subtotal, table 1)	21, 224	153, 440
II. AAA (see AAA summary subtotal, table 1)	127, 568	332, 320
III. AAA subcontracting and monitoring of projects	366, 624	1, 282, 112
IV. Title III subcontracts in-house documentation systems (estimate; see footnote table 1)	3, 666, 240	-----
V. Title VII major documents	122, 759	346, 252
VI. Title VII in-house supporting document system	4, 389, 749	3, 342, 880
Totals	8, 694, 164	5, 457, 004

TABLE 3.—SUMMARY "PAPER" COSTS

Costs col. (A)	\$86, 941
Costs col. (B)	\$ 190, 995
Total	277, 936

¹ Costs for col. (A) were developed by taking a minimum cost of 1 cent per page for the preparation of the forms. (See tables 1 and 2.) 1 cent times 8,694,164 pages of forms.

² Costs for col. (B) were computed on the basis of a 3.5 cents per page copying (3.5 cents times 5,457,004 copies),

TABLE 4.—DESCRIPTION OF DISTRIBUTION NETWORK OF MAJOR POLICY AND PROGRAM ISSUANCES

	AAA's original set (N=536)	AAA's in-house; 2 copies per AAA (N=1,072)	SUA's original set (N=56)	SUA's in-house; 5 copies per SUA (N=280)	Title III subcontracts ¹ (N=2,144)	Other interested individuals (N=176)	AOA (N=39)	OHD (N=30)	Program information officer, SUA (N=56)	Federal Council on Aging (N=16)	Nutrition project director (N=809)	VII's additional copy for file (N=809)	Miscellaneous (N=100)	Total number of copies per original (14)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
AOA PI's.....	X	X	X	X	¹ X		X	X			X	X		5,775
AOA IM's.....	X	X	X	X		X	X	X	X	X			X	2,361
AOA TAM's ²	X		X	X	² 536	X	X	X	X	X	² 202	² 202	X	2,213
SUA policy memos and issuances.....	X	X	X	X	¹ 214						X			2,967
AAA policy memos and issuances.....	X	X			¹ X									3,752
OSCP's ³	X		X			X	X	X		X				³ 879
AG's.....	X													4536

¹ Number developed by using an estimate of 4 title III subcontracts per AAA.

² Only a portion of the TAM's go to title VII's.

³ Complete information is not available on OSCP's (Office of State and Community Program Issuances) or AG's (AOA regional office issuances).

⁴ The numbers for the distribution network were taken from AOA mailing keys.

TABLE 5.—PROJECTED COSTS OF ISSUANCE SYSTEM¹

	I	II	III	IV	V	VI	VII	VIII
AOA PI's.....	318	5,775	1,836,450	\$64,276	44	3,584	157,696	\$26,808
AOA IM's.....	1,170	2,361	2,762,370	96,683	90	953	85,770	14,581
AOA TAM's.....	878	2,213	1,943,014	68,006	43	1,933	83,119	14,130
SUA memos.....	² 100	2,967	296,700	10,385	36	1,559	56,124	9,541
AAA memos.....	² 100	3,752	375,200	13,132	36	2,144	77,184	13,121
OSCP's.....	(50)	879	43,950	1,538	(50)	879	43,950	7,472
AG's.....	(25)	³ 536	13,400	469	(25)	536	13,400	2,278
Totals.....	2,641	7,271,084	254,489	517,243	87,931

¹ See table 5—Attachment A for explanatory codes for cols. I through VIII.

² Numbers represent low estimates for AAA/SUA policy issuances per year.

³ Estimates are derived from 1 sample AOA regional office.

ATTACHMENT A (TABLE 5) PROJECTED COSTS FOR ISSUANCE SYSTEM

Column

- I. Yearly total of "original pages" to be distributed to Aging Network.
- II. Number of copies that must be prepared for distribution to the Aging Network (see table 4).
- III. Total number of copies to be prepared for distribution. Multiply Column I \times Column II.
- IV. Total xerox costs figured at an estimated cost of 3.5¢ per page. Multiply 3.5¢ \times Column III.
- V. Total pieces of original material to be distributed by mail. In Column I the total pages are listed. The Column V number is smaller because many of the memos and issuances will be more than one page.
- VI. Number of pieces that must be distributed by mail. In Column II the number of copies prepared for distribution are indicated. In many cases, these copies can be distributed without mailing. The number in Column VI represents an estimate of the number of pieces of mail required for distribution of a single original memo within the Network.
- VII. Total pieces of mail that must be prepared and distributed. This is computed by multiplying Column V \times Column VI. For example, there are 44 PI's to be distributed, and 3,584 of the 5,775 copies must be distributed by mail.
- VIII. The Total Cost of Mailing was computed by multiplying Column VII by an average cost of 17¢ per piece of mail.

Total costs for distribution network

Total costs column IV	\$254, 489
Total costs column VIII	87, 931
Total cost	<u>342, 420</u>

TABLE 6

PROJECTIONS OF PAPERWORK IN LOCAL PLANNING PROCESS

Planning Process (A)	TOTAL								
	1	2	3	4	5	6	7	8	9
	Information Collection (B)	Primary Data Analysis	Secondary Analysis	Decisions Required	Document Preparation	Results Appear in Area Plan	Reviewed by Advisory Council (A.C.)	Average Original Pages Yearly for AAA	# Pages to be Developed for A.C. Review
(1) Needs Assessment	X				X	X	X	50	10
(2)(3) Evaluate Resources	X	X	X		X	X	X	50	5
(4)(5) List Alternatives	X				X		X	100	5
(6) Establish Priorities		X	X	X	X	X	X	50	5
(7) Program Objectives/Action Plans			X	X	X	X	X	50	25
(8) Implementation			X		X			128	
(9) Assess/Monitor	X	X	X	X	X			312	
(10) Evaluate/Modify & Refine Objectives	X	X	X	X	X	X	X	50	25
TOTAL PAGES								790*	75

*These numbers represent minimum estimates based on investigator's experience in sample AAA.

ATTACHMENT A (TABLE 6).--PLANNING PROCESS FOR
DEVELOPMENT OF AREA PLAN ON AGING

Steps in Planning Process	Suggested Activities for Each Step
1) Assess Needs of Older Persons - Total population, or sub-population - Total PSA, or specific geographic locations	<ol style="list-style-type: none"> 1. Conduct surveys, interviews with local, State officials 2. Examine census data 3. Seek Advisory Council input 4. Consult studies, reports
2) Evaluate Effectiveness of Existing Services System	<ol style="list-style-type: none"> 1. Client surveys 2. Interviews with public, private agencies 3. Perform general cost/unit of service analysis
3) Identify Gaps, Deficiencies in Services, Corrective Action Needed	<ol style="list-style-type: none"> 1. Identify non-existent but necessary services 2. Compare needs with effectiveness of existing services 3. Identify excessively high service costs
4) Develop List of Possible Alternative Approaches	<ol style="list-style-type: none"> 1. Develop new program/service ideas 2. Develop suggestions as to improvement of current service system 3. Consult reports of other experiences 4. Obtain Advisory Council input
5) Research and/or Investigate Alternatives, Including Potential Funding Resources	<ol style="list-style-type: none"> 1. Review other experiences with these approaches 2. Consult national research 3. Investigate Federal, State, local funds currently not oriented toward programs for older persons but with potential; investigate funds which are currently directed toward programs for older persons but which may be increased 4. Investigate use of volunteers and public employment program
6) Establish Priorities	<ol style="list-style-type: none"> 1. Weigh needs vis a vis potential resources 2. Obtain advisory Council input
7) Develop work plan: program objectives and Implementation strategy	<ol style="list-style-type: none"> 1. Prepare work schedules, assignments 2. Conduct public hearing(s) and modify proposed plan if necessary
8) Implementation	<ol style="list-style-type: none"> 1. Develop contracts, grants, intragency agreements, etc. 2. Initiate activities
9) Assessment and Monitoring	<ol style="list-style-type: none"> 1. Develop assessment/monitoring tools and schedules 2. Provide orientation to agencies involved in implementation of objectives 3. Execute monitoring/assessment schedule 4. Provide feed-back on results
10) Modification and Refinement	<ol style="list-style-type: none"> 1. Refine, redefine objectives 2. Make needed changes in implementation strategy

Source: This exhibit was adapted from an exhibit prepared by Frank Newton Associates, Atlanta, Ga., for State of Kentucky's Department for Human Resources, Aging Program Unit.

TABLE 6 - Attachment B

FLOW CHART OF RECOMMENDED PLANNING PROCESS

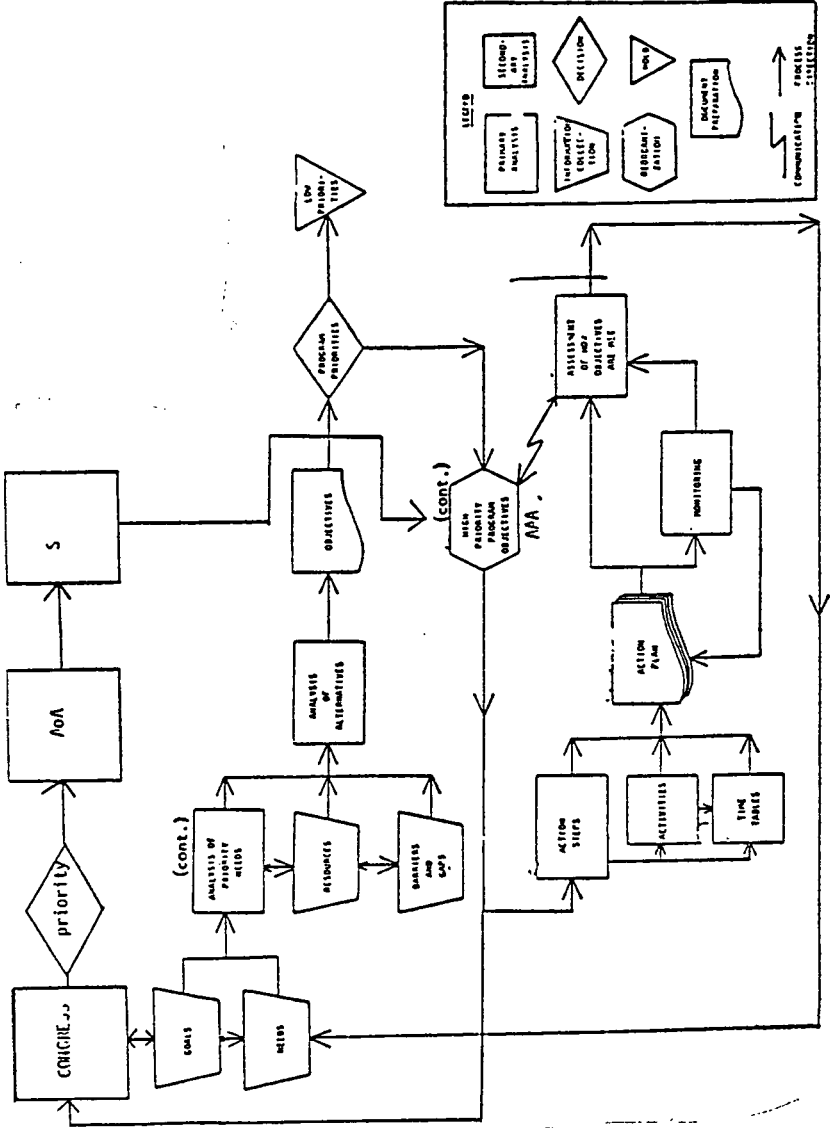


TABLE 7

SUMMARY COSTS FOR PAPERWORK IN LOCAL PLANNING PROCESS*

- I. Total AAA paperwork = 423,440 pages
 Multiply Table 6 Column 8 (average pages yearly per AAA)
 X total number of AAAs (536).
 (790 pages X 536 AAAs = 423,440 pages)
- II. Total copies for Advisory Committee
 Review Process = 1,513,125 pages
 Multiply Table 6 Column 9 (number of pages to be copied for
 Advisory Committee Review) X total membership AAA Advisory
 Committees (20,175).
 (75 pages X 20,175 members = 1,513,125 copies)
- III. Costs for basic document reproduction = \$14,820.
 (Total pages (I) X 3.5¢)
- IV. Costs for document distribution to Advisory Committees = \$52,959
 (Total pages (II) X 3.5¢)
- V. Total reproduction and distribution costs = \$67,779
 (III + IV = \$67,779)

*Figures drawn from Columns 8 and 9, Table 6 are employed to calculate the costs presented in Table 7.

Part 3

METHODOLOGY AND ANALYSIS OF MAJOR AoA COMPLIANCE DOCUMENTS

Part 3 presents an in-depth content analysis of major required reports. The attempt has been to describe and analyze the data collected and look at its potential utility within the reporting and monitoring system.

A. SUMMARY CONTENT ANALYSIS OF KEY DOCUMENTS

Two primary complaints were voiced by the respondents relative to the major compliance documents (see table 1, attachment B, p. 39):

(1) There is a major emphasis within the reporting system on administrative procedures and processes. When documents are prepared for review, or comments are received by OAA agencies, the primary focus is on how the agency will be run and not on what the agency will do.

(2) There is a concerted effort within the reporting and monitoring system to make everything operational. Respondents expressed their concern that a lot of information is lost because the AAA, the SUA or AoA wants everything reduced to little bits of information.

An effort was made to test these complaints (see table 9, attachment A, p. 67). If well founded, they raise serious questions about the potential utility of the existing documentation and reporting systems as the basis for project and contract monitoring, evaluation and policy level decisionmaking. A simple method was designed to review and code document information based on two sets of analytic concepts: categories and types of information.

1. EMPHASIS ON ADMINISTRATIVE PROCEDURES AND PROCESSES

By coding information according to four categories, administration, planning, services development, and advocacy, the investigators sought to critically assess respondent complaints concerning over-emphasis of key documents on administrative procedures and processes.

The second set of coding reflects the types of methodologies available to develop the information. Information was coded according to whether the information represented was fiscal, quantifiable, descriptive or analytic. The profile based on this coding of available documents was designed to aid in the examination of complaint (2) above.

Taking the SUA plan as a key document, it is clear that 50 percent of the total information collected focuses primarily on recording administrative agency activities and operations. This trend is clear throughout the State level documents—rising to a high of 61 percent of all information collected in the SUA quarterly report and sinking

to a low of 31 percent of data in the monthly fiscal report. In the State level documents a total of 11 percent of the information addresses the combined categories of: planning activities and advocacy activities. Taken as a whole the information collection does not represent a balanced recording of the SUA's activities aimed at major mandates of the OAA.

This overall trend holds true in our analysis of AAA level and title VII level compliance documents. The AAA plan (area plan) ¹ reflects a somewhat more balanced approach to information development about key agency activities.

However, such a balanced pattern of data gathering and information preparation of the AAA plan is not repeated in the AAA assessment tool. The information of most interest to the contractor (in this case, the SUA) falls heavily in the area of administration. These discontinuities of emphasis between the various documents within the system of contracting and monitoring reflect the overall concern and major emphasis of the contract monitor, and the pressures of accountability which constrain their activities.

The AAA subcontracting system's documents reflect some of these same types of discontinuities. In the initial application stages major portions of the information collected relate to planning and services development. At various points within the reporting system these emphases vary or disappear. In all, the information collected at the title III subcontract level appear appropriate in light of their major subcontracting activity (provision of services). The same certainly cannot be said for title VII reports.

Excluding the budget, the title VII reporting system emphasizes administration and agency project operations versus program development. Here again the categories of planning and advocacy become residual (hardly relevant) categories.

There are a number of explanations for the varied emphasis on the categories of information collected within the AoA reporting system. Much of the actual information gathered by OAA agencies never appears in any report. However, if the information in this reporting system is to provide a basis for major policy decisions at the AAA, SUA and AoA level, it is severely limited in its bias toward administrative procedures, organizational operations and normal agency operating procedures. The complaints and issues raised by the respondents concerning the administrative-technical emphasis appear to have some validity. While our method of analysis was very inductive, and the individual codes for each discrete piece of information required interpretation, sufficient information has been coded to document a trend. There is a trend within the system to emphasize administrative procedures and activities, and to deemphasize direct services development.

2. REPORTING AND MONITORING SYSTEMS REDUCE INFORMATION BY OVER-CONCRETIZING THE DATA

In considering the second complaint, we examined the types of information developed. The data in columns 7 and 8 (table 8, p. 65) indicate the numbers, check marks, and other discrete elements of information.

¹This analysis is based on the revised AAA plan instituted in 1976, for fiscal year 1977.

These types of data codes are valuable in analyzing the extent to which the information is simply reduced to numbers and the overall extent of the system's emphasis on numbers. The third type of information is descriptive information, that is, information that could not be coded as quantifiable or fiscal but which did not fit into the analytic classification. Our effort here is to capture how much information must be prepared in narrative form describing agency or project operations. The last type of data (column 10) was analytic information.

At least half of the respondents raised serious questions about the types of assessment tools used at the SUA, AAA and local levels. Respondents claimed that multiple judgments are implicit in these assessment procedures, yet they consistently experienced the acceptance of their own clearly ambiguous data as objectively concrete and valid reports of activities. The virtual acceptance of program "guestimates" by their contract monitors was unsettling. As one OAA agency staff member said: "No matter how many little indicators you have there is still the point where someone has to say, 'yes' or 'no'; this is or is not good." Here and elsewhere, OAA agencies indicated their desire for feedback, technical assistance and evidence of genuine interest in program issues by their monitors.

A specific examination of the assessment tools showed that respondent concern about the quality of the report data was accurate. Further, in only a few instances were discrete bits of information drawn together in the assessment tool to substantiate specific conclusions. Where conclusions were drawn or analytic information was developed in the documents, the same trend of information gathering away from services and toward administration was shown. Overall there is an emphasis within the system on quantifiable and descriptive information. Fiscal data represents a relatively small portion of the sheer volume of data collected.

Although it is not evident in table 8, the investigators identified another trend while coding the information. Often, a document with high percentages of information in the category of services development would have a correspondingly high percentage of information under quantifiable and fiscal types of information. (For examples of this see the SUA and AAA quarterly reports.) When there is an emphasis on services development and provision in the monitoring and reporting system, that emphasis is on producing quantifiable data which, as noted above, is very difficult to derive. In the subsequent discussion for table 9 on evaluation and assessment, the SUA quarterly is specifically addressed in terms of the degree to which it requires quantified data on services and program impact, data which have been found to be unreliable, invalid and inappropriate.

Thus, we concluded that respondent complaints and concerns have some grounding in reality. In addition, a detailed content analysis of the documents within the reporting and monitoring system reveals other potentially problematic trends such as the heavy emphasis on quantifiable data in the quarterly reports.

Perhaps the explanation of the negligible impact this information system has had on policy and program level decisionmaking lies in the quality of the data developed at the OAA project level which is incorporated and forwarded in the major compliance reports to the national level. The major data that are collected and passed upward

are located in the quarterly reports on performance and progress. These data are developed at all levels, summarized and passed on to the next level for another version of the report.

In this pyramid of data, the major qualitative information concerning such areas as planning, needs analysis, priorities, and service impacts of the AAA and SUA remains buried at the bottom. What is passed on is deceptively concrete in its appearance. It gives the basic data on numbers served, dollars pooled, staff hired, dollars spent, etc., that appear in the SUA quarterly reports and reappear in the national summary of program performance.

The system has three major characteristics: (1) It emphasizes administrative process and procedures and deemphasizes planning, and advocacy activities or results in terms of total data collected; (2) data collected about major program activities at the local levels is sifted out of the reporting process due to the limits on local data collected, and the extent to which such data are simplified in summaries at the national level; and (3) the reporting system attempts to convert exceedingly qualitative and impressionistic information for national decisionmaking into easily quantifiable, concrete and descriptive pieces of data without due consideration for the nature of the phenomenon under consideration. These types of information problems are discussed in more detail below.

B. DOCUMENT ANALYSIS TO IDENTIFY POTENTIAL PROJECT ASSESSMENT AND EVALUATION INFORMATION

Our content analysis of the major OAA compliance documents included an analysis of report data potentially useful in (a) project assessments, and (b) project evaluations. Initial problems arising from this coding of the information in the major compliance documents (see table 1, attachment B, p. 39) are discussed briefly below.²

Operational definitions were developed to distinguish assessment and evaluation types of information from the total data collected in the document. Technical assistance material developed under contract from the Administration on Aging, "Objective Setting" (1975) produced by Kirschner and Associates, provided the basis for these definitions and the codes developed therefrom.

A key document, the SUA objective assessment tool completed on a quarterly basis, is illustrative of the types of coding decisions made in table 9 (p. 67). Of the 1,388 data items in this document, 528 (38 percent) are assessment relevant in that (a) the objectives as stated were addressed without applying any critical analysis of the standards for achievement or the quality of the achievement, and (b) most of the information centered on the completion of identified discrete action steps without focusing on the extent to which these activities actually forwarded the overall goal or objective. The completion of a set of identified action steps is not in itself consonant with completing the

² Concerning the definitions for the codes contained in table 9 and attachments, one point should be made. The investigators initially attempted to code the document data using three categories: compliance, assessment, and evaluation. Compliance information was defined as basic descriptive information concerning ongoing administrative activities and procedures considered normal or necessary for organizational maintenance—which reflects no delineation or perception of a specific action step as to a stated program objective or goal. Thus, the detailed information re inhouse and procedures systems are neither critical nor evaluative.

After initially coding four documents, it became apparent that categories of information were not mutually exclusive. The difficulty developed in distinguishing compliance information (which percentage of total data was consistently approaching 100 percent) from all information. Since no clear operational separation could be made, the code was dropped.

stated objective according our own review of a number of State plans (e.g., a series of action steps focusing on the documentation of need for transportation among elders may not result in the objective of increasing transit resources being met). The types of information that identified meetings to take place, reports to be produced, and other agency or interagency activities designed to affect resource allocations or direct service provisions were coded as assessment to the extent the document items did not elaborate on the overall impact of the activity on resources or services.

Evaluation information identified in the major compliance documents was small in comparison to the overall data collection and development effort. As outlined in table 9 attachments, evaluation was operationally defined as information regarding actual out-puts or impacts versus planned out-puts or impact. As outlined earlier in sections on planning, evaluation involves the critical analysis of actual achievements with a comparative examination of specific performance in relation to acceptable standards for performance and acceptable criteria for measuring achievement.

On the whole a meager portion of the total information collected could be identified as potentially useful for project evaluation. The criticism voiced earlier in this report that OAA related issuances and reporting documents emphasize procedures, process and simple contract compliance, is borne out. Respondents interviewed at the local level repeatedly voiced concern that no one in Washington could possibly know what they were doing or what impact they had, given the existing data reporting system.

Simply stated, the information potentially useful for evaluation is not easy to develop and, given the scope of the act and numerous mandates under which local programs operate, it is very difficult to identify impact measures that are fair in the short run (by capturing immediate impacts), useful in the long run (in reflecting the complexities of any impacts) and that allow for ongoing overtime comparisons. As illustrated in the following section on the SUA quarterly performance report, what little actual evaluative information collected is highly suspect in regard to its appropriateness for measures of impact due to its reliability and validity problems.

To perform project evaluations, standards and baseline data are needed. Standards must relate to expected productivity, acceptable contract performance, and impact. The types of standards currently considered are difficult to apply.⁴ In the area of direct service impact, the standards are virtually created by the contractee.⁵ The setting of acceptable standards is difficult particularly in the case of the OAA; nevertheless, standard setting is central to encouraging and tracking productivity and effectiveness via evaluation.

⁴ (See discussion of the SUA assessment tool in section on issuances.) Part of the difficulty in developing standards resides in the inherent ambiguity of what planning, coordination and advocacy actually are. The ambiguities in these tasks thwarts standard setting and consequent appropriate performance measurement. This, in turn, can result in goal displacement or deflection. (See C. L. Estes, "Barriers to Effective Community Planning for the Elderly," *Gerontologist*, 13 (1973), 178-183; C. L. Estes, "Goal Displacement in Community Planning for the Elderly: Implications for National Policy," in M. P. Lawton, R. Newcomer and T. Byterts (eds.), *Planning for an Aging Society* (Stroudsburg, P. A.: Dowden, Hutchinson and Ross, 1976).

⁵ This general approach is consistent with AoA's most recent issuance (AoA-PI-77-12, November, 1976) on standards of performance in which SUA's are charged with developing their own standards of performance for planning, management and advocacy (through the aggregation of individual AAA and title VII project developed standards).

From a methodological perspective there are three major problems with the current system of reporting.

1. NO BASELINE DATA HAVE BEEN COLLECTED

There are no baseline data against which to measure the impact of the overall AAA/SUA title III strategy. As a national program, and even at the local project level, the effectiveness and impact of the Older Americans Act cannot be evaluated properly without (1) baseline data against which to assess change or (2) comparative data analyses between and among the varied approaches within the general OAA title III strategy.

2. DATA COLLECTION

The data collected are sifted up through the system, becoming more quantified, more uniform and progressively less informative. Units of services from [distinctly] different projects are grouped under headings such as home care; (a) numbers served and (b) dollars spent. This data aggregation prevents comparisons at either the local or State levels between different program designs and funding strategies. There is no place even for a comparative examination of such simple assessment data as the relative unit of service costs from one project to another. Within the funding parameters of the act, discrete comparative studies can and should be developed. Data derived from local projects would contribute to such an evaluation; the current reporting and monitoring system mitigates against this type of comparative project analysis. Thus, the aggregated data is useless for even the simplest cost per unit of service analysis. While it is difficult to compare cost effectiveness and cost efficiency of programs funded under the act, it is much more difficult to compare the impact of the funding strategy with other funding strategies designed to produce more services at the local level. Mechanisms for dealing with these broader issues are needed in the current OAA reporting systems.

3. UTILITY OF DATA FOR EVALUATION

The utility of information identified in table 9 as evaluation relevant is questionable. The character of the recorded data was repeatedly described by respondents as generally unfaithful to the reality of what is happening. Numerous examples of such data problems are readily apparent. When there are no means tests, data on the number of low-income participants cannot be collected in a uniform and valid manner. Given the nature of many of the services, and the difficulty of maintaining unduplicated counts, minority participation cannot be accurately recorded. When there is an overemphasis on quantifiable short term activities (as reflected in a "get the numbers" attitude), there is scant incentive for services to be targeted, for example, to reach the isolated, homebound and handicapped which would likely result in smaller numbers. Certainly there is little emphasis on such accomplishments in the data collection.

A sample of three State plans were specifically examined as illustrative of the data development and information problems outlined above. We cross referenced the categories of information (admin-

istrative, planning, social services and advocacy) and types of information (fiscal, quantifiable, descriptive and analytic) with the data potential for assessment and evaluation. In so doing, three exhibits were determined to require the most careful delineation of potentially useful evaluative data in the State plan. These were: (1) the affirmative action plan, (2) the training and manpower development plan, and (3) the introductory statement of objectives. Although not shown in the summary codes in table 8, we were able to identify the percentages of potential evaluation information from our coded tabulation sheets for each exhibit.

In all cases, less than half the information was coded as evaluation-relevant. In the affirmative action plan, 47 percent of all data were coded as having evaluation potential; 40 percent of the training plan data contained evaluation potential. In the objective statement, only 16 percent of the data were deemed potentially useful in evaluating the impact of the completed objectives in any way.

The major focus of the objective statements (summaries of major SUA contracted activities) was on assessment rather than evaluation. In brief, very little of the information presented in the objective statements of the three sample SUA plans would be helpful in answering questions on evaluation.⁶ Our findings lend credence to the claim of some respondents that the State plan was a compliance tool focusing on procedures, processes and administrative requirements rather than a plan for services.

Of all the data prepared in the State plan which directly addressed social services,⁷ only 88 data bits of the total 485 (18 percent) were coded as even potentially evaluation-relevant. Thus, less than one-fifth of the total information on social services (see table 1) required some degree of analysis, provided for comparative cases, or lent themselves to the quantification necessary for evaluation of project outcomes in the area of social services.

In sum, only a small portion of the total data collected in the State plan (12 percent) would be useful for evaluation. The information potentially useful for evaluating the impact of SUA activities in the area of social services is even smaller, 6 percent (88 data bits out of a total 1,456 data bits). This pattern is repeated in the SUA quarterly program performance report.

C. STATE UNITS ON AGING (SUA) QUARTERLY REPORT ON PROGRAM PERFORMANCE

The SUA quarterly report on progress and program performance represents the major SUA report for gathering and quantifying program information. It is a compilation of all statewide activities undertaken by the SUA, AAA's, AAA subcontractors and title VII projects.

Two important criticisms were raised by respondents regarding the utility, reliability and validity of the SUA quarterly report:

The SUA quarterly report represents primarily administrative process and procedures information, and to the extent it does reflect major activities of the SUA, AAA, or VII, it looks mostly at the

⁶ See the attachment A, table 9 questions 4-10.

⁷ 485 of the total 1,456 data bits (33 percent directly address social services) in the State plan.

activities of its funded subcontracts. As such, the quarterly report ignores most of the important aspects of the SUA and AAA activities while focusing on information about small title III subcontracts and the title VII subcontracts.

To the extent that the quarterly report does generate quantifiable numbers or identify products which technically could be used in evaluating SUA's, AAA's or title VII's, respondents indicated that these reported numbers and products were not reliable—in that they were not comparable; the numbers reflected a face value guess orientation (and as such were of questionable validity); the information collected required analysis which was never undertaken to clarify meaning. Thus, they reported that in general these data were questionable as the major means either of accounting for or evaluating the impact of the act.

More than 700 data elements are required to complete the SUA quarterly report. Of these, there are 69 data elements (10 percent) prepared each quarter which could be employed as evaluation information; all 69 represent best estimates by self-report, with few, if any, substantiating documents. Staff responsible for preparing the supporting documents at the AAA and VII levels, gave a general consensus that to develop the data on the unduplicated counts, dollars pooled and target groups served was time consuming. Further, they reported the data were often made up; and there was no uniform method for deriving measures of pooled resources or estimates for target groups served.

Many agency responses indicated that completing the report was primarily a political exercise and the numbers had little to do with reality. Some respondents went so far as to indicate that the report required people to make up numbers and lie. Significantly, the numbers prepared are never verified (even on a sample basis) by the SUA or AoA; nor is substantial documentation required as to the basis for the figures presented. If these problems with the data in the SUA quarterly report are true, the major portion of evaluation-relevant information currently being collected is regrettably questionable.

1. EXAMPLES OF PROBLEMS WITH THE QUARTERLY PROGRAM PERFORMANCE REPORT

The 1977 form generates quantifiable information in two major areas which potentially could be utilized for evaluation purposes. However, respondents raised questions concerning reported reliability of the data, lack of uniformity (e.g., noncomparable data), and the uses and potential misuses of the data. More specifically, respondents posed many issues and questions with regard to specific items of the program performance report for title III and title VII.

Item: Enter the total estimated dollar value of resources pooled at all levels of the State to support the title III and title VII programs (SUA Quarterly Program Performance Report, 1977, Part 1-B).

Questions raised by respondents:

- (1) Are matching funds included under pooling?
- (2) Is there any comparative analysis of the pooling effectiveness of other Federal programs?

(3) By lumping the entire State into one total figure how is it possible to distinguish between SUA activity, AAA activity and title VII activity in the area of mobilizing additional resources?

(4) Given an incentive funding strategy, does it make sense to talk about pooled support for title III programs, e.g., how is it recorded when the title III subcontract is a small portion of a larger program. Is the entire program counted as a pooled resource in support of title III?

(5) Do AAA's and SUA's have uniform methods for assigning values, developing dollar estimates, and listing resources under the category of pooled resources?

(6) What does it mean to pool resources such as limited special transit funds which carry with them a requirement that they serve seniors? (In this instance, is pooling of resources mandated to serve the elderly really pooling, and doesn't the success of one AAA in fact represent the loss by another?)

(7) How can the pooling outcomes be evaluated unless a total picture is presented of all resources going into senior programs and the increase of resources into these senior programs due to the OAA agency efforts? ⁸

(8) If what has occurred is a mere administrative transfer of funds from one contractor (e.g., Department of Social Welfare to SUA) is the administrative transfer of authority over a fixed allocation to be counted as pooling in support of III and VII—i.e., does pooling reflect new money only or the relocation of existant resources, some of which are already allocated for the elderly.

(9) Finally, how is pooling defined? If an agency advocated for the spending of special transit funds in the area but does not administer the funds, nor is provided any piece of the funding, can the agency be said to have pooled those resources. Pooling is a broad, nebulous classification which is politically useful but upon inspection becomes a confusing catch-all.

Item: Report the estimated number of persons served by social service category and the amount of title III funds allocated by category (SUA Quarterly Program Performance Report, 1977, Part 2-C).

Ambiguities and dilemmas identified by respondents:

(1) A number of respondents pointed out that for many of the service categories (particularly information and referral and transportation) it was not possible to report numbers served, but only units of service. In both instances there was a belief that what was in fact being reported was the unit of service and as a result the numbers were inflated.

(2) If an incentive funding strategy is used by an AAA in developing its subcontracts, the amount of title III funds allocated (e.g., amount subcontractor receives) would not truly represent the total cost of providing the service; the actual project cost would include title III resources, matching resources, and all other resources supporting the project. Consequently, if the total numbers served are divided into

⁸ The evaluation of the impact of pooling reflects the same problems documented in GAO reports on the evaluation of the impact of revenue sharing funds. The report documented the problems in assessing the impact of reported revenue sharing expenditures unless baseline data existed for resources and expenditures prior to the program.

the title III allocation the result would be a cost per unit of service or per person served that would not reflect the actual cost of the services. Take a day care project, for example, receiving \$7,000 for one part time recreation therapist. The match on \$7,000 (\$700) brings the total title III reported costs up to \$7,700. The actual cost of the day care program far exceeds this amount.

(3) If the title III funds represent a small portion of the total grant or resources involved in a project (and ideally they would) how are title III clients to be counted? Does the AAA report only a portion of the numbers served which approximates the portion of the entire grant made up by title III?

(4) This reporting system stresses a purchase of services approach to funding which appears inconsistent with the overall intent and scope of the OAA in employing title III funds as seed money or incentive funding. The focus of this part of the SUA quarterly report is on units of service (which our analysis of AAA funding shows to represent about 50 percent of the total funds subcontracted to the local level). This focus ignores key analytic questions concerning the effect of AAA pooling efforts and those of the SUA as well as the basic pooling effect of direct service contracts. Respondent interviews reaffirmed concerns that a numbers game was being played which did a disservice to any serious examination of the potential impact of the title III strategy under the OAA.

Item: Enter the estimated total number of older persons who have been served by nutrition projects (SUA Quarterly Program Performance Report, 1977, part 3-E).

Issues raised by respondents:

This piece of data has formed a major data base for the refunding of title VII; however, as a single piece of data it reveals little about the effects or impact of the title VII program. As outlined by respondents, the aggregation of data on numbers served is an inappropriate measure of performance.

There is a basic assumption that the title VII program is designed to provide ongoing nutritional support and socialization for individuals unable to meet their needs due to lack of income, mobility or mental health problems. Thus, the assumption has been made that title VII is designed to serve a fixed group of people over a period of time. If, for example, a project serves 200 meals per day, it would ideally be serving the same 200 individuals over a period of time. A project serving 200 meals per day which logged in 800 individuals in a week could technically be said to have failed to meet the objective.

Given the emphasis on the numbers served, a question exists as to whether larger numbers represent AoA's view of more successful programs. If the support system concept is emphasized, however, the numbers served should reflect a minute portion of the total numbers of meals served. With 260 meal days per year, allowing for variations, the total numbers served should represent 1/200 of the total meals served. If the VII participant number gets too large, it theoretically should signify a major problem in the development and delivery of the program.

As it is, respondents are encouraged to report high numbers (No. meals and No. persons) in this section of the quarterly report. The dual emphasis on quantity of participants and support system develop-

ment reportedly has enhanced confusion about the intent of the VII program thrust.

2. SUMMARY ISSUES: QUARTERLY PROGRAM PERFORMANCE REPORT

Difficult questions concerning the major pieces of data collected in the report remain unresolved. These questions cast serious doubt on the appropriateness and accuracy of the data which are aggregated into the national summary of States' performances and which also provide AoA statistical data on the program performances of titles III, IV, and VII.⁹

Our concern over the reliability and validity of the SUA Quarterly Report data is magnified by the knowledge that:

This information is used to satisfy the interest of OMB, congressional committees, and other Government departments, for justifying budget requests through OHD, DHEW, OMB to Congress, and for monitoring the status of aging programs.¹⁰

In general, the type of data sought in the SUA quarterly assessment report (since it represents AoA's major performance data) provides OAA agencies a message as to what program outputs are acceptable. The report form, however, enumerates no terms for credit or potential reward (or incentive) for accomplishment.

Significantly, because no data are sought on agency accomplishments in tapping new resource bases or on the effect of services delivered on older persons themselves, these varied but critical potential program impacts are likely to be underemphasized in agency efforts. This is because, as Warner and Havens describe it: "What is (positively) sanctioned tends to be what is evaluated; and what can be evaluated tends to be what is visible and tangible and measurable."¹¹ This discourages agency efforts to pursue difficult or intangible objectives (because they are not easily measurable) even though these may be the most significant in meeting the intent of the OAA.

There appear to be neither set standards or incentives instituted to elicit specific types of SUA or AAA performance. Vagueness in defining, specifying (and thereby accounting for) activities comprising OAA tasks (e.g., pooling, coordination and advocacy) contribute little to definitive accomplishments. Thus, whatever is reported in the SUA quarterly report (and the component AAA reports required for compiling such data) may simply operate to symbolically legitimize the agencies' ongoing operations on an as usual or status quo basis.

D. STANDARDS OF PERFORMANCE

The current system of monthly program performance reports described in section C is being revised. Beginning with the dissemination of AoA-PI-77 (November 3, 1976) the Administration on Aging began to implement a new system of program monitoring. This

⁹ AoA response (letter from Commissioner A. Fleming) to Senator Frank Church, Chairman, U.S. Senate Special Committee on Aging, concerning AoA's funding of research utilization and technical assistance materials since the 1973 amendments (Nov. 3, 1976).

¹⁰ *Ibid.*

¹¹ W. Warner and A. E. Havens "Goal Displacement and the Intangibility of Organizational Goals," *Administrative Science Quarterly* 1968, 13, 539-555.

new system calls for the creation of standards of performance based on current levels of service delivery and projected increases in the quantity and quality of services to be delivered throughout the coming year. The new standards ask the SUA to report on the numbers receiving social services under title III and VII of the Older Americans Act as well as elders receiving services under funding from all other public and private sources. The objective is to develop a baseline profile of all services available and used by the elders within a State.

The implementation of this new system relies on a bottoms-up planning process. AoA has asked that AAA's set their own standards for these measures of current performance and projected increases in performance. Area agencies on aging are expected to develop the data and yearly estimates locally and the State unit on aging to aggregate it for the State.

AoA would then be able to develop cumulative quantified standards for the Nation. The system as of now offers minimal definitions for services, and does not incorporate sufficiently detailed directions to assure the development of comparable data. In its promulgations, AoA notes that much of the report will reflect best estimates.

Respondents were asked specifically about the development of this new baseline data, the development of the 1978 State plan objectives which are intended to address projected increases in service delivery, and the problems confronted in filling out the new semiannual progress reports. The uniform response was simply that it was very difficult to estimate the number of individuals receiving services under title III, and it was virtually impossible to accurately identify all elders receiving services under all other funding sources. Respondents questioned the reliability, validity and utility of the new data by raising the questions cited in the previous section C.

The new standards of performance brought forth respondent questions as to: The functions of the performance standards? The criteria needed to set the standards? How the systems of monitoring and data collection will be developed which will enforce or evaluate the achievement of standards? And what incentives or sanctions are available to AoA for enforcing the standards?

Respondents were convinced that failure to meet their stated objectives or standards as set forth in the 1978 State plan could not be construed as sufficient reason to cancel contracts or withhold funds. They believed that the standards represented only a general goal setting, and were not tantamount to a contracted obligation.

If the standards are not contractual obligations or representative of purchased services or outputs, and the system only reflects best estimates—how useful is its reporting in relation to staff time and effort which must be invested? Regrettably the system's implementation does not appear able to alleviate the problems of data quality and utility which have been raised in this report. Therefore, it may merely add to the existing paper burden while yielding data of little value at the Federal level.

E. THE ISSUANCE SYSTEM

The issuance system is an example of the types and status of information distributed to the OAA agencies. As designated in the AoA IM-75-58 (November, 1975), the AoA issuance system is comprised

of three major documents: information memoranda (IM's), program instructions (PI's), and technical assistance memoranda (TAM's).

As part of this study, all issuances listed in the AoA index for 1976 were coded for analysis. In classifying 178 memoranda of the AoA issuance system according to their administrative versus programmatic emphasis, the following pattern was identified: The 91 information memoranda disseminated an assortment of information. Of the 44 program instructions coded for 1976, 33 (75 percent) related primarily to the administration of the OAA, including titles III, IV-A, V, and VII, while only 11 memoranda (25 percent) addressed basic programmatic issues such as service development, national priority services, coordination and pooling activities. Of the 43 technical assistance memoranda coded for 1976, 10 (23 percent) dealt with administrative and fiscal matters, while 33 (77 percent) addressed programmatic issues directly.

1. INFORMATION MEMORANDA

Description of information memoranda: "Information memoranda are designed to contribute to the knowledge and information base of State and area agencies on aging and nutrition projects on matters related to the field of aging. Their content is not binding . . . (etc.)"¹²

Respondents' comments: "IM's might as well be round filed; we don't have the time to look at them." Or, "I don't have time to even look at IM's. It's information that might be interesting but who has time to notice. Sometimes they seem to be completely off the wall."

In view of these comments, the value and utilization of IM's appear to be questionable.

The two major components of the AoA issuance system that raised questions among the respondents were the PI's and TAM's.

2. PROGRAM INSTRUCTIONS

Description of program instructions: "Program instructions (PI's) clarify and expand on policies stated in regulations and provide procedures for their implementation. . . . Program instructions set forth statements of policy which are binding."¹³

Respondents' comment: "Program instructions are confusing. They come in late; they are hard to understand at times, and it's as though they can turn the program upside down. You never know when they are going to come and when they arrive you have to stop and figure out what they say."

Respondents consistently indicated difficulty in handling policy development via program instructions in a timely manner. The problems cited involved the time it took to perform the following activities: Figuring out the instructions and, in the case of AAA's, getting back to SUA regional offices for clarification; waiting for them to contact AoA on the matter; developing an in-house response and redistributing the instructions and necessary material to staff, contractors and others who might be involved in the issue. SUA's and AAA's reported that they found themselves implementing PI's that

¹² AoA-IM-75-58.

¹³ Reply of U.S. Commissioner on Aging, A. Flemming, to inquiry of Senator Frank Church, Chairman, U.S. Senate Special Committee on Aging, Nov. 27, 1976.

were incomplete and confusing. This, in turn, forced agencies to make crisis policy decisions which sometimes were not well thought out.

SUA and AAA staff pointed to numerous instances of increased paperwork due to such problems. One example was the recent transitional quarter funding for title V senior centers. In some localities, applicants for funds ended up preparing one set of application papers according to one PI and a second set when the final PI was released. For one \$4,000 grant, a local applicant prepared a 45-page application and then was notified of the necessity for rushing in additional information which had not been listed as necessary.

Not only do procedures change, but timelines and due-dates are subject to change as well. The resulting confusion, raises doubts about the effectiveness of PI's in developing and distributing critical information.

A second major criticism raised by respondents concerns the extent to which policy is being developed via the PI's, which are outside the normal legislative mandates and review systems. While AoA asserts that PI's are used primarily to clarify and expand on policies, there are instances where it has appeared that policy has been reinterpreted, (as in PI-75-28 on home delivered meals, and in PI-75-35 on the I&R requirements).

AoA states, "because of the developmental nature of these programs during the past 4 years . . ." issues requiring policy reformulation will arise. Comments from the agencies are solicited only "when major policy questions are addressed."¹⁴

Though policy issues are addressed as a matter of course, respondents were convinced that AoA had no identifiable or systematic method (even within the program instructions) for reformulation of policy. A number of respondents indicated that there is a very fine line between interpretation and reformulation.

Summary issues on PI's:

- PI's should be released in a manner to allow sufficient time for clarification and development of definitions, program guidelines, and any required application procedures.
- The distribution system for PI's should recognize the focal role of SUA's and AAA's in implementing title III programs, and in coordinating other activities under the act. To release major PI's throughout the system prior to AAA and/or SUA review severely restricts their ability to respond in a timely manner.
- Major PI's should be reviewed to assure compliance with the intent and scope of the act. The procedures of administrative interpretation and policy clarification lend themselves to potential misinterpretation and obfuscation.

3. TECHNICAL ASSISTANCE MEMORANDA

"Technical assistance memoranda provide State and area agencies and title VII nutrition projects with tools, models, and techniques to assist in improving and expanding their capacity to carry out their planning, coordination, evaluation and administration and technical

¹⁴ Reply of U.S. Commissioner on Aging, A. Flemming, to inquiry of Senator Frank Church, chairman, U.S. Senate Special Committee on Aging, Nov. 27, 1976.

assistance responsibilities and to meet the objectives of the Older Americans Act. The content of TAM's is not binding."¹⁵

"The Administration on Aging no longer issues guidelines. The technical assistance memoranda, generally speaking, has taken the place of guidelines."¹⁶

"Comments are not normally solicited" . . .¹⁷

While the technical assistance communication impose no requirements, they are action oriented. Their purpose is to place in the hands of State agencies program tools, models and techniques—information which is designed to stimulate State agencies to undertake new or expanded initiatives. The potential for action on the part of the SUA distinguishes the technical assistance memorandum from the information memorandum.

Respondents indicated a problem regarding the status of TAM's. For example, AoA states that a "TAM on the use of advisory bodies was issued in response to a number of requests for clarification on this subject." This same TAM was later received by an SUA Commission on Aging with a cover letter invoking the TAM as policy (the function of the PI). This confusion is not clarified by the AoA statement that, "In every instance the purpose of communicating with the network is for one of two reasons—(1) to provide policy direction to the network (binding PI's), or (2) to provide information (nonbinding IM's) and assistance to the network (nonbinding TAM's)."¹⁸

Technical assistance materials are usually detailed pieces of information developed to address specific program activities of OAA agencies. They represent a major source of information and material concerning the basic programmatic activities of the SUA, AAA, title VII and title III direct service subcontractors. AoA does not have the authority to require compliance or even utilization of these materials, nor do the materials have policy status.

Yet a review of the major documents, in particular, the new standards for national priority services in the SUA assessment tool (1976) and the planning process outlined in the instructions for development of an area plan reveal that technical assistance (TA) material may be invoked as policy. (In some instances, this material had not previously appeared in the act, regulations or PI issuance systems.) Reportedly there is a growing tendency at all levels to invoke these memoranda standards and guidelines as policy.

Given the paperwork burden and the information flow that must be managed by an OAA agency, problems arise in distinguishing between assistance and policy. The SUA and AAA assessment tools lump together a variety of standards for agency performance and indicators to measure standard achievement which represent a mix of regulations, technical assistance materials, PI's and so forth. The result of mixing these proverbial apples and oranges in the various AoA documents is (1) a lack of clear monitoring priorities, (2) a confusion regarding minimum performance standards, and (3) a lack of understanding of when conditions are sufficient to invoke noncompliance sanctions.

¹⁵ AoA-IM-75-58.

¹⁶ *Ibid.*

¹⁷ Reply of U.S. Commissioner on Aging, Arthur Flemming, to an inquiry of Senator Frank Church, Chairman, U.S. Senate Special Committee on Aging, Nov. 27, 1976.

¹⁸ AoA-IM-75-58. Cf. Also AoA correspondence with Senate Committee on Aging, November 27, 1976.

An IV-A contract recently awarded by AoA for the development of technical assistance materials and program standards raises the question: how susceptible will these delineated (but clearly voluntary) materials and standards be to misinterpretation or misapplication as AoA policy directives?

The ambiguous status of TAM's is perhaps most clearly illustrated in the following quotation from the cover memo on the recent *Manual of Policies and Procedures for Title III and VII* (1976):

This manual will incorporate all the Federal policy presently in effect for the two programs and will provide the *framework for making policy changes in the future. The manual also serves as a form of technical assistance to State agencies.*

This mixture of policy and technical assistance in AoA issuances, coupled with a complex system of reports, assessments and plan documents, confuses the issue of basic accountability and opens the way for policy shifts of major import—which could occur without proper authorization.

F. SUMMARY ISSUES

(1) The document content study identified three major information problems within the system of contract monitoring and program reporting: (a) The system emphasizes administrative process and procedures, and deemphasizes planning and advocacy relative to the total data collected. (b) The major portion of data of relevance to assessing program impacts is at the local levels. Much of this information is sifted out of the data summaries which form the basis for national program profiles. (c) By forcing the conversion of basic qualitative and impressionistic information into highly quantified pieces, the data become distorted—revealing neither the nature of the program nor its impact on objectives. For example, developing a picture of pooling activities undertaken by an AAA is difficult when the reports reflect only simple totals for dollars pooled, with neither explanation, documentation, or necessary baseline data to compare resource levels before and after initiation of the pooling effort.

(2) The content analysis of evaluation-relevant data collected in the AoA compliance documents reflects only a potential for individual project level evaluation.¹⁹ That is, the data compiled for these AoA reports could be useful in evaluating the effectiveness of individual III and VII projects in achieving their stated objectives. Properly disaggregated and comparatively analyzed, these data could permit an assessment of the relative effectiveness of different local projects in achieving program objectives.²⁰

Significantly, however, none of the respondents interviewed believed these document data were employed in decisionmaking about the OAA program. As previously noted, data are simply summed from one level and passed on to the next level. No visible utility seemed to exist for the data beyond its political value. In fact, it was vigorously argued

¹⁹ Project level evaluation is defined as evaluation of the effect and effectiveness of individual projects (e.g., AAA's) in meeting their own objectives. These objectives may or may not coincide entirely with "National" goals of the OAA.

²⁰ This of course would rest on the assumed comparability and accuracy of the data reported—an assumption which may not be warranted.

by OAA agency staff that absolutely no efforts had ever been made by AoA to assess the mountains of data passed on in these reports.

To summarize, if these problems were resolved, the data collected in the compliance documents would have potential for informing program decisionmakers regarding implementation strategies within the basic OAA mandate.

The content analysis of potentially relevant evaluation data revealed a relative paucity of good, reliable, accurate and appropriate impact data. Evaluative information focuses primarily on administrative capacity and social service delivery. However, major portions of the act (coordination, pooling, planning, and advocacy) receive minimal attention.

A detailed analysis of the major program performance document, the SUA quarterly program performance report, raised serious questions surrounding the validity and reliability of data currently available to AoA concerning the title III and VII effort. Content analyses and interviews indicate that the data with the greatest potential for addressing questions of program impact are either questionable or entirely omitted from the data collection documents.

It must be emphasized, however, that no amount of analysis of these data will address the questions of the national level program impact of the OAA which are critical to enlighten policy considerations and decisions concerning programs and budget levels. Any such evaluation of the overall effectiveness of title III and VII of the OAA in meeting the national objectives (also in comparison with other national strategies) would require a different evaluation approach.

(3) The issuance system is unwieldy for the promulgation and clarification of policy. The time lags involved in distribution PI's and TAM's (plus time lags required for clarification and followup on the issuances at the local level) support a general confusion regarding the status of the issuances—that is, are they law, regulations, requirements, guidelines or suggestions?

Two major issues were raised concerning the AoA issuance systems. First, respondents expressed concern that policy was being developed outside of normal regulatory (i.e., legislative) channels via PI's from AoA. Second, the vague status of the TAM's seriously confuses the issue of accountability in that they represent something less than policy and more than information. Yet, AoA lacks authority to require local compliance or utilization. Agencies report difficulty in distinguishing between these suggested standards and minimum acceptable performance standards. Thus, serious confusion exists regarding contract monitoring standards, priorities, and sanctions.

From the document analysis it appears that clear program objectives which permit measurement of program outputs have not developed. Thus the OAA strategy, especially title III, remains obscure in terms of specifiable objectives. On the other hand, administrative compliance issues appear so specific that they can restrict program flexibility, and may sidetrack potential goal oriented activity.

(4) One uniform thread running through all of the interviews concerned what respondents called anomalies. These occur when policies promulgated via AoA's issuance system appear to contradict existing regulation or law by redefining the scope or intent of the OAA, re-ordering program priorities, or reshuffling roles or responsibilities.

A detailed content analysis of policy anomalies²¹ in the issuances was not possible in this study because of time limitations. However, the following problems were identified:

(a) The existence at different times and localities throughout the country of anomalous policies reflects a lack of clarity and consensus regarding the goals and objectives of the act.

(b) AoA's generation of detailed information of varying status—law, policy, regulations, guidelines, technical assistance, and suggestions—can lead to anomalies concerning the status of the information as well as interpretation of its content.

(c) Given the high probability that a policy issuance carrying a number of interpretations from different political, administrative and program perspectives will magnify uneven implementation of national objectives, reliance on the issuance system as the major form of information distribution and clarification needs to be reconsidered.

²¹ Examples of anomalies cited are the confusing and varying AoA positions on the interrelation between titles III and VII over time; AoA policies concerning maintenance of effort and the 3-year limitation on funding, and AoA's dual emphasis on advice only from older persons in its ostensibly advocacy oriented program.

APPENDIX TO PART 3

TABLE 8.—SUMMARY DOCUMENT ANALYSIS

Compliance documents ¹	Category										Type							
	Num-ber of pages	Total of data	Administration		Planning		Services development		Advocacy		Fiscal		Quantifiable		Descriptive		Analytic	
			Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
I. SUA																		
State plan.....	113	1,456	726	50	72	5	485	33	173	12	295	20	384	27	687	47	90	6
State monthly.....	36	828	264	31	48	6	468	57	48	6	816	97	-----	-----	12	3	-----	-----
State quarterly.....	32	704	428	61	-----	-----	276	39	-----	-----	252	36	404	57	48	7	-----	-----
SVA assessment format.....	106	776	494	-----	41	-----	179	-----	62	-----	-----	-----	-----	549	-----	227	-----	-----
SVA objective assessment tool.....	40	1,388	588	-----	36	-----	656	-----	108	-----	-----	-----	1,196	104	-----	88	-----	-----
Assessment subtotal.....	146	2,164	1,082	50	77	4	835	38	170	8	-----	-----	1,196	55	653	30	315	15
SUA totals.....	327	5,152	2,500	49	197	4	2,064	40	391	7	1,363	27	1,984	39	1,400	27	405	7
II. AAA																		
AAA plan.....	89	1,127	323	29	285	25	360	32	159	14	332	30	234	21	452	40	106	9
AAA quarterly report.....	56	2,372	584	25	228	10	1,332	56	228	9	36	2	1,696	72	224	9	416	17
AAA assessment.....	69	1,332	538	40	78	6	451	34	265	20	-----	-----	-----	1,203	90	129	10	-----
AAA monthly fiscal.....	2	100	11	11	-----	-----	89	89	-----	-----	100	100	-----	-----	-----	-----	-----	-----
AAA subtotal.....	216	4,931	1,456	30	591	12	2,332	45	652	13	468	10	1,930	39	1,879	38	651	13
AAA/SUA total.....	541	9,983	3,945	40	788	8	4,207	42	1,043	10	1,731	17	3,914	39	3,262	33	1,056	11
III. AAA SUBCONTRACTING AND MONITORING PROCESS																		
Awards procedures.....	93	678	129	19	343	51	198	29	8	1	179	26	149	22	310	46	40	6
Awards monitoring procedures:																		
Project monthly.....	60	2,208	1,212	55	-----	-----	996	45	-----	-----	1,104	50	624	28	468	21	12	1
Site visit assessment.....	8	51	39	77	-----	-----	12	23	-----	-----	12	24	-----	39	76	-----	-----	75
Objective assessment.....	2	16	-----	-----	-----	-----	16	100	-----	-----	-----	4	25	-----	16	50	12	50
Quarterly progress report.....	8	32	16	50	-----	-----	16	50	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
AAA total.....	171	2,985	1,396	47	343	11	1,238	42	8	-----	1,295	43	777	26	833	28	80	3
IV. TITLE VII																		
Application.....	50	478	272	57	43	9	153	32	10	2	-----	-----	91	19	335	70	52	11
Budget application.....	14	862	213	25	-----	-----	649	75	-----	-----	862	100	-----	-----	-----	-----	-----	-----
Quarterly report.....	20	268	208	78	-----	-----	60	22	-----	-----	75	28	193	72	-----	-----	-----	-----
Monthly fiscal.....	12	732	408	56	-----	-----	324	44	-----	-----	732	100	-----	-----	-----	-----	-----	-----
Yearly assessment.....	69	430	237	55	-----	-----	193	45	-----	-----	-----	-----	43	10	258	60	129	30
Title VII total.....	165	2,770	1,338	48	43	2	1,379	50	10	-----	1,669	60	327	12	593	21	181	7

¹ See table 1, attachment B.

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ATTACHMENT A (Table 8).—*Explanation of summary document analysis chart*

Column	Column heading
1. Total pages in report/document.....	Number of pages.
2. The measure developed to indicate the number or quantity of "bits" of information sought (e.g., numbers, short paragraphs, budget figures, etc.). This represents categories for which information is sought:	Total number data.
3. Agency in-house budgets, staffing pattern and information, in-house development, interagency relations for the purpose of "organizational maintenance and institutionalization," basic compliance issues such as affirmative action and Civil Rights, allocation of staff time to organizational maintenance activities.	Administration.
4. Needs assessments, resource evaluations, identify needed services, coordination strategies to develop/increase efficiency and effectiveness of services; identify strategies designed to bring additional resources into the service sector, pooling, supportive services and gap-filling services.	Planning.
5. Defines services and/or units of services to be provided, numbers of individuals to be served, sets out priority listings, action plans designed to implement services/impact on services, resource allocations for services (coordination, pooling, supportive and gap-filling), impact statements, or standards, assessment and monitoring of stated goals, estimated "impact" on services development.	Services development.
6. Information and data concerning advisory councils, senior groups, consumer groups, hearings legislative activities, etc. This represents different types of information:	Advocacy.
7. Budgets, cost per unit, etc.....	Fiscal.
8. Numbers used, totals, timelines, discrete quantum of data (numbers, check marks, filling in boxes for categories, etc.)	Quantifiable.
9. Basic narrative data which tells about an observable event, describes a procedure, etc.	Descriptive:
10. Data which requires an act of judgment in its preparation; answers to impact statements, descriptions of cause-effective relationships, reasons for specific decision, etc.	Analytic.

TABLE 9.—DOCUMENT ANALYSIS TO IDENTIFY POTENTIAL ASSESSMENT AND EVALUATION INFORMATION

	Total		Assessment		Evaluation	
	Number of pages	Number of data items	Number of data items	Percent	Number of data items	Percent
Title III—SUA:						
State plan.....	113	1,456	586	40	175	12
State monthly.....	36	828	11	1	11	1
State quarterly.....	32	704	496	70	276	39
SVA assessment format.....	106	776	221	29	40	5
SVA objective assessment tool.....	40	1,388	528	38	-----	-----
Assessment subtotal.....	146	2,164	749	35	40	2
SUA total.....	327	5,152	1,842	36	502	10
Title III—AAA:						
AAA plan.....	89	1,127	427	38	128	11
AAA quarterly report.....	56	2,372	2,072	87	352	15
AAA assessment.....	69	1,332	593	45	153	12
AAA monthly fiscal.....	2	100	11	11	11	11
AAA total.....	216	4,931	3,130	64	644	13
AAA/SUA total.....	541	9,983	4,923	49	1,124	11
Title VII:						
Application.....	50	478	163	34	72	15
Application budget.....	14	862	649	75	71	8
Quarterly report (4).....	20	268	76	28	44	16
Monthly fiscal.....	12	732	10	1	10	1
Yearly assessment.....	69	430	150	35	150	35
Title VII total.....	165	2,770	1,048	38	347	13

ATTACHMENT A.—(TABLE 9) CODE DESCRIPTION

The two categories represent operational definitions developed from AoA technical assistance materials.

Assessment: The following criteria were used for this category:

Information items that could be said to answer questions regarding (1) inputs designed to bring about specific outputs, (2) planned activity designed to achieve a stated goal, (3) action steps in the objective statements, (4) questions in assessment tools for which a yes answer tells you something has happened, and (5) information that specifies what happened?

Operationally the researcher used questions 1 through 3 of the Kirschner material (1975). If the information fit in these 3 areas, it was coded as assessment.

Evaluation: For this category the following criteria were developed:

(1) Are the results as planned, (2) are there standards to judge the impact, not merely to indicate the presence of an activity of a defined nature (units of service versus operational definitions of what the service looks like), (3) any information which answers or could be used to answer the questions attached from 4-10 in the (Kirschner) format.

Basically, "evaluation" requires a critical review of the achievement of objectives: did they do what was designed; are there better ways to do it; was it effective, efficient, etc.

Definitions for "assessment" and "evaluation" codes: The list of 10 questions¹ below are representative of efforts to clarify and assess the scope and intent of monitoring activities. As indicated in the explanation for table 9, information in answer to questions 1-3 was coded as data potentially useful for assessment and information from questions 4-10 was coded as potentially useful for "evaluation."

¹"Objective Setting and Monitoring," Kirscher Associates (Washington, D.C.: DHEW, 1975), Pub. No. (OHD) 76-20204.

ASSESSMENT QUESTIONS

- (1) What was done? Assessment of effort or input; measures of this kind will use a description or count.
- (2) What happened?
- (3) Do the results match the intended results? (a) Data here may be gathered via presence or absence of product numbers served, changes in attitude or behavior; (b) use direct observation, surveys, examine records.

EVALUATIVE QUESTIONS

- (4) Are the actual results satisfactory to meet the need?
- (5) What are the explanations for the results achieved?
- (6) How efficient was the program selected in achieving the objective (approach)?
- (7) What other activities should be undertaken?
- (8) What activities should be discontinued in terms of being unproductive for achieving the objective?
- (9) To what extent should objectives be adjusted to reflect experience?
- (10) Is the target group being reached?

