

Implementation and Public Policy

with a New Postscript

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Chapter 1

An introduction to policy implementation

In 1970 Congress passed and President Nixon signed into law the Urban Growth and New Communities Development Act. It was hailed as the cornerstone of a bold new urban growth policy to lead the nation into the twenty-first century. The act promised a dramatic change in the way communities were organized and allowed to develop, away from the classic cycle of rampant urban sprawl encircling a decaying center city to relatively self-contained, planned communities large enough to support a range of living styles and economic opportunities within their borders. These "new towns" would provide a mix of industrial, commercial, residential, and public facilities and open spaces all sensibly laid out during the planning stage. Greenbelts would surround the towns and density limits would be imposed to limit physical size and population. Through careful planning under federal tutelage, new communities would succeed where so many previous programs had failed; they would achieve both social and racial integration within their borders. The actual construction of new communities would be done by private enterprise, but the federal government would provide financial support, planning assistance, and general guidance. This was to be the beginning of a new positive public-private partnership in all aspects of urban living.

In four short years these dreams were dashed, leaving behind a series of partially begun new communities, many unmet promises on the part of the federal government, recriminations and disappointment on all sides, and, ultimately, neglect of the program by the Department of Housing and Urban Development (HUD). Barely a murmur of protest was heard from Congress.

As citizens and taxpayers we have the right to know how this could have happened. Could the outcome have been different? Can we learn from the experience and avoid similar problems in designing future public programs? These are the challenges of policy implementation analysis.

Separate but equal is not equal under the Fourteenth Amendment of the United States Constitution declared the Supreme Court in its 1954 decision, *Brown v. Board of Education of Topeka, Kansas*. In the words of Chief Justice Warren, "Separate educational facilities are inherently unequal. Therefore, we hold that the plaintiffs . . . are, by reason of the segregation complained of, deprived of equal protection under the laws." The implication was profound. The several thousand dual school systems in the South and border states would have to change their deeply rooted and long-standing practice of school segregation. In later decisions, the courts ruled that racially motivated boundary drawings, pupil placements, and other school policies that resulted in segregated schools—techniques used most often in the North which did not have formal dual school systems—also must be eliminated. Ten years after *Brown* Congress passed the 1964 Civil Rights Act, which stipulated, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits or, be subjected to discrimination under any program . . . receiving Federal financial assistance." The meaning of the mandate was unmistakable; desegregation in all school systems receiving public funds was to be ended.

Mechanisms were established in the Department of Health, Education and Welfare (HEW, reorganized into the Department of Health and Human Services) to ensure that this provision of the Civil Rights Act was applied to public schools across the nation. Yet it was not until the end of the 1960s—a decade and a half after the historic *Brown* decision and several years after the passage of the Civil Rights Act—that dual school systems in the South were actually dismantled under HEW supervision. Why did it take so long? Why had the law of the land established by the Supreme Court and Congress gone unimplemented for so many years? And what turned the picture around dramatically at the end of the 1960s? In the North, though some strides have been made through private efforts, the full powers of the federal government have never been brought to bear on segregated schools. Why not? What factors are responsible for desegregation where it has occurred and segregation where it remains?

For several years the California legislature turned back bills to provide comprehensive land use regulation and environmental protection for the state's 1100-mile coastline, despite growing public sentiment in favor of coastal protection. While local governments had full jurisdiction over coastal land use, it appeared that these local jurisdictions were unable or unwilling to curtail the rapid spread of urbanization along the coast. In the southern portion of the state urbanization threatened nearly 250 miles of coastline extending from Santa Barbara south through Los Angeles, Orange, and San Diego counties to the Mexican border. Little was being done to keep open for

the general public the visual and physical access to the beach. There were few attempts to coordinate home building, commercial and industrial developments, and roads and other services to mitigate their adverse effects, or to protect the state's few remaining wetlands so critical to coastal marine life. In 1972, a coalition of environmental groups brought before the state's voters an initiative that was an interrelated package of proposals for coastal protection, planning, and management. The initiative, Proposition 20, called for establishment of state authority over every proposed development within 1000 yards of the coast and state power to veto any project that would adversely affect the coast or preclude future public usage. It also required that within three years a plan be drawn up for the long-range protection and use of the coastline, spelling out in detail the steps that would be needed to protect the resources of the coast and the type of permanent state authority over the coastline that would be necessary. After a hard-fought battle between the environmental coalition and many businesses, developers, and local interests, Proposition 20 was enacted into law in November 1972.

To this day the Coastal Act stands as the most encompassing, powerful, and innovative land use program in the nation. The Coastal Commissions, established by Proposition 20 to carry out its mandate, by and large have executed their function in an effective and timely manner. Their decisions on proposed developments have shown a sensitivity to environmental impacts, a long-range plan for the coastline was developed true to the protectionist mandate of the initiative, and the Coastal Commissions were reconstituted on a permanent basis by the state legislature in 1976 and have continued to function in a manner generally consistent with the goals of the 1972 Act.

Why was the Coastal Act so well implemented, particularly in comparison with the less successful attempts to implement the new communities and desegregation programs? Are there lessons of a general nature that can be learned from the coastal protection program to help us better understand and improve public policy implementation? We will argue throughout this book and illustrate with these and other case studies that the basic components of policy implementation are the same across most policy areas and that effectiveness of their implementation results from the presence of more, or less, of the relevant factors. We will elaborate on just what those factors are in the following chapter. But first we will sketch out briefly a few general observations on the emerging field of policy implementation analysis.

Who has been paying attention to implementation?

Despite the many obvious differences in the new communities, school desegregation, coastal protection, or any other programs undertaken by government, they share one important feature: Knowing the objectives set for the program by Congress, the Supreme Court, or the president usually gives

only a general hint of what will actually be done by the agency responsible for carrying out the program and how successful it will be at winning the cooperation and compliance of persons affected by it. To understand what actually happens after a program is enacted or formulated is the subject of *policy implementation*: those events and activities that occur after the issuing of authoritative public policy directives, which include both the effort to administer and the substantive impacts on people and events. This definition encompasses not only the behavior of the administrative body which has responsibility for the program and the compliance of target groups, but also the web of direct and indirect political, economic, and social forces that bear on the behavior of all those involved, and ultimately the impacts—both intended and unintended—of the program.

Surprisingly, both practitioners and students of government are only beginning to appreciate the full importance and general characteristics of the implementation process. Scholars outside the field of public administration have traditionally dismissed problems following enactment of a program either as trivial or viewed them in terms of rational and impartial program administration. When objectives were not being met, the solutions sought were thus those of better—more rational, scientific, efficient, hierarchically controlled—administrative systems. This attitude reflected the belief in the constitutionally prescribed division between the legislature's role of formulating policy and the executive's role of doing no more than faithfully carrying out the wishes of the legislature. For most observers of the governmental process the salient issues were those raised at the point of legislative enactment. Nevertheless, in two distinct lines of inquiry, the literature reflected a movement toward a greater appreciation of the importance of policy implementation.

One field of inquiry was that of classic public administration. While there may well have been a period of innocence during which the administration of a statute was viewed as nonproblematic, as simply a matter of handing over a settled legislative decision to civil servants to be carried out faithfully and efficiently, such a view did not long withstand serious scrutiny. On the one hand, a number of important studies in the decade before and after World War II¹ revealed that administrative agencies were affected not only by their legal mandates but also by the pressures of concerned interest groups, by the intervention of legislators, and by a variety of other factors in their political environments. Moreover, during the 1950s and early 1960s organizational theorists expressed serious doubt about the degree of hierarchical control in even private bureaucracies operating in relatively stable environments. They identified the now familiar phenomena of subunit loyalty, cognitive limits on rationality, distorted communication flows, and difficulties in monitoring subordinates' behavior.²

The second body of theory important in the creation of a distinctive literature on policy implementation was the development of a systems approach to political life.³ Systems theory allowed policy analysts to break

out of the organizational perspective of public administration and start thinking in terms of inputs from outside the administrative arena, such as new legislative and administrative policy directives, changing public preferences, and new technologies. This, in turn, directed attention to what have become the standard questions of implementation analysis: To what extent are the policy outputs of the administrative agencies and the subsequent outcomes of these decisions consistent with the original policy objectives? What effects, in turn, do these outcomes have on subsequent legislative decisions, i.e., on policy feedback and reformulation?

The literature in these two fields provided many of the conceptual and empirical insights upon which implementation research was built. But it was the perceived failure of many Great Society programs of the 1960s, and the related phenomenon of problematic compliance with the Supreme Court's desegregation and school prayer decisions, that provided the essential intellectual, emotional, and financial spur to the investigation of the relationships between pronounced public policies and subsequent administrative performance. Just as much of the best empirical work in the years around World War II had sought to explain the tendency of New Deal regulatory agencies to become dominated by their clientele,⁴ so it was the desire to investigate the anatomy of failure which prompted the vast majority of early implementation studies: Title I of ESEA,⁵ President Johnson's cherished "new towns in-town" program,⁶ job creation programs,⁷ and desegregation in the South.⁸

The seminal study of the reasons behind the government's inability to attain its stated policy objective, Pressman and Wildavsky's analysis of the failure of federal agencies to create 3000 new jobs for unemployed inner-city residents of Oakland, California, set the tone for much of the implementation literature to follow.⁹ It focused on the factors that were to distinguish the mainstream of implementation analysis from the antecedent literature on public administration:

1. An explicit concern with policy evaluation as well as with political behavior, with examining the extent to which various policy objectives were achieved as well as the reasons for the performance.
2. A focus on what Pressman and Wildavsky termed "the complexity of joint action," i.e., the myriad of actors in various public and private institutions involved in the implementation of a decision rather than the more limited traditional concern with the actors within a single agency and its immediate political environment.
3. A careful analysis of the (often implicit) causal assumptions behind the original policy decision which would have to be met if policy goals were to be attained.

For the scholarly community to give inadequate attention to implementation until the perceived collapse of the Great Society programs may be understandable, but what of the members of Congress and state legislators

who presumably have had a long-standing interest in overseeing the programs that they have enacted? Indeed, democratic creed provides that one of the most important checks on inappropriate and ineffective administrative action will be the watchful eye of the elected representative. Some rather extraordinary legislators have in fact overseen implementation, especially over legislation which they have sponsored, but most have not. And although Congress has incorporated greater oversight responsibilities within its standing committees in recent years, most members find little payoff in devoting time to the effort. The reasons why legislators fail to oversee remain as valid today as when first enumerated by Scher nearly twenty years ago in his analysis of Congress.¹⁰ Scher points to seven reasons:

1. *Congressman tend to see opportunities for greater rewards in the things they value from involvement in legislative and constituent-service activity than from participation in oversight activity.*
2. *Committee members tend to view the agencies as impenetrable mazes and to believe that any serious effort at penetrating them poses hazards for the inept Congressman which outweigh any conceivable gain to him.*
3. *Congressmen who have established mutually rewarding relationships with agency people tend to be reluctant to initiate or become actively engaged in a close review of that agency's affairs.*
4. *Congressmen tend to view their personal contacts with the agencies as more efficient than committee investigations for serving constituents and group needs.*
5. *Committee members will tend to avoid agency review if they expect it will provoke costly reprisals from powerful economic interests regulated by the agencies.*
6. *Congressmen who perceive that gains to themselves can be had by loyalty to the President can be expected to avoid close examination of the performance of agency officials appointed by the Executive.*
7. *As committee routines become fixed . . . in ways that make no regular provision for agency oversight, in the absence of powerful external stimuli, they [committee members] tend to resist change.*

Furthermore, no recent president has been able to devise an effective system of control over the vast federal establishment which the president ostensibly heads, though several have tried some form of agency reorganization in addition to planting loyal partisans among the ranks of top department and agency officials.¹¹ While selective monitoring has been accomplished by the president's White House staff and Office of Management and Budget, these are notable exceptions. Apparently, the reality of being the chief executive of the nation, or for that matter of a state, today, is that there are far greater rewards in promoting new programs than in tending to the far less glamorous task of monitoring ongoing ones.

However, in the face of an unprecedented failure to deliver, which was the case with many Great Society programs,¹² both scholars and practitioners

turned their attention in the 1970s to implementation, to an examination of how to devise more efficient and successful programs. While the investigators agreed that there were serious problems in implementation, several different perspectives emerged from the disagreement over how best to analyze the problem.

Critical issues in policy implementation

While we hope to demonstrate shortly the efficacy of our approach to viewing and studying the implementation process, it is important to keep in mind that there is a good deal of divergence in the field over several key issues. We shall therefore identify some leading questions that have arisen and suggest how choices on these issues have tended to direct research in the field.

The relationship between formulation and implementation

Certainly most scholars have assumed that a reasonably clear distinction can be drawn between (1) the formulation/adoption of a policy, usually in the form of a statute or a landmark court decision; (2) its implementation by one or more administrative agencies and perhaps the courts and subordinate/peripheral legislatures; and, in many recent studies, (3) its reformulation by the original policymaker based in part upon the successes and difficulties of the implementation experience.¹³ This view, based on the definition of implementation as the carrying out of a policy decision made by a public authority, is reaffirmed by Americans' traditional belief in the separate functions of legislatures as enactors and administrative agencies as executors of public policy. It is also the approach taken in several studies of the implementation of various innovations by public bureaucracies.¹⁴ Finally, while Rein and Rabinovitz have called attention to the need to distinguish the development of general policy guidelines from their "routine" administration and enforcement, they view these as substages in the implementation of major statutes.¹⁵

However, the conceptual distinction between formulation and implementation has been implicitly challenged from two sources. The first source is what has been termed the "adaptive" or "interactive" approach to implementation, which emphasizes the adjustments that take place between goals and strategies among various actors throughout the process to the point of rendering the formulation-implementation distinction meaningless. This approach is perhaps best illustrated by Bardach and by the Rand study by Berman and McLaughlin of the adoption and implementation of educational innovations in local school districts.¹⁶ The second and similar challenge comes from Majone and Wildavsky. While they regard as illegitimate any effort by

implementing officials to alter basic goals and strategies, they nevertheless advocate a view of policymaking in which goals and programs are continuously modified to adjust to various constraints and to changing circumstances. They state:

Policies are continuously transformed by implementing actions that simultaneously alter resources and objectives.... It is not policy design but redesign that goes on most of the time. Who is to say, then, whether implementation consists of altering objectives to correspond with available resources or of mobilizing new resources to accomplish old objectives?... Implementation is evolution.... When we act to implement a policy, we change it.¹⁷

This latter view serves as a useful reminder that statutes and appellate courts decisions are elaborated and often modified as they go through the implementation process. Moreover, there may well be occasions when the distinction between formulation and implementation is quite blurred. These include cases in which the original policy decision is so ambiguous as to be vacuous, for example, the legislative directive to "regulate in the public interest," thereby forcing implementing officials to actually formulate a "policy" if there is to be one. Other problematic cases involve those occasions when the formulation of a reasonably coherent policy involves numerous interchanges among courts, legislators, and administrative agencies over a number of years. This has recently been the case, for example, between the Court of Appeals in the District of Columbia and the Environmental Protection Agency in the attempt to develop regulations for initiating formal safety reviews of pesticides.¹⁸ A third type of problematic case involves the gradual evolution of a small experimental program into a major policy innovation.¹⁹

Nevertheless, there are several reasons why the distinction between formulation and implementation should be maintained. First, the fact that problematic cases are the exception rather than the rule. Second, if we accept Majone and Wildavsky's argument that objectives evolve *continuously* as a result of the interaction among a myriad of actors or as a response to new circumstances, then evaluation of goal attainment becomes impossible. Third, and perhaps most importantly, viewing policymaking as a seamless web obscures one of the principal normative and empirical concerns of scholars interested in public policy, namely, the division of authority between elected public officials (principally legislators) on the one hand, and appointed and career administrative officials on the other.²⁰

Moreover, we need not reject the formulation-implementation distinction in order to incorporate legitimate concern with the evolution of policy over time as value priorities change. In fact, the division into three basic stages of *formulation, implementation, and reformulation* directs attention to this distinction by focusing on the extent to which the legislature or the court

modifies its original policy as a result of the implementation experience. For example, as we shall argue in Chapter 4, an analysis of the implementation of the automotive-related provisions of the 1970 Clean Air Act reveals that the 1977 Amendments essentially retained the original goal of a 90 percent reduction in new car emissions but (1) reduced it to 75 percent in the problematic area of nitrogen oxides (2) extended the unrealistic timetables in the original legislation, (3) clarified the originally implicit constraints on EPA's efforts to reduce vehicle miles traveled through transportation control plans, and (4) greatly increased the sanctions available to EPA in its effort to convince states to enact automobile inspection and maintenance programs. Likewise, viewing policymaking as an iterative process of formulation, implementation, and reformulation—rather than a seamless web of continuous evolution—helps focus on the traditional concern with administrative discretion. One can ask such questions as the following:

1. At what substage of the implementation process did the important discretionary decisions occur? During guideline writing by central authorities? During the subsequent processing of cases? As a result of performance gaps revealed by audits, formal evaluation studies, or other feedback mechanisms?
2. Did the exercise of discretion involve efforts to make sense out of conflicting statutory mandates, modification of statutory intent in order to accommodate the objections of important political actors, or the development of policy initiatives in an area on which the original statute was silent?
3. How significant was the discretionary authority exercised by implementing officials? Did it fundamentally modify the basic objectives of the legislation or merely the strategies for achieving them?
4. Were the policy adjustments made during implementation the result of administrators' preferences or a response to court decision or legislative oversight?
5. To what extent were these adjustments subsequently affirmed, modified, or rejected by the original policymaker (usually the legislature) in the course of formal reformulation?

In short, while the formulation-implementation-reformulation distinction may be difficult to apply in some instances, it can certainly incorporate most of the concerns of those advocating a "policy evolution" approach to the study of implementation. On the other hand, obliteration of this distinction jeopardizes the ability to assess both the extent of goal attainment and the distribution of authority between elected and appointed officials.

Criteria and focus of program evaluation

All implementation studies seek to evaluate program performance, though they can differ markedly in the evaluative criteria employed. They can also be

distinguished by where they focus on either policy outputs or eventual outcomes (or both).

On the issue of evaluative criteria, most research has begun with the formal objectives enunciated in the original statute or appellate court decision. This is to be expected, given the historical preoccupation of much implementation research with assessing the extent of goal attainment and analyzing the reasons for the inability of major policy initiatives to actually attain their stated objectives. This focus on legal objectives has also revealed their frequent ambiguity and inconsistency and the consequent adjustments that must be made during the implementation process. Finally, in focusing on the original policymakers' intent, one can ask both was the optimum level of objectives attained? and, even if not attained, did the program result in more of those values than would have been the case without the program? The latter approach involves some thorny methodological problems in specifying what might have occurred without the program, but it nevertheless may be precisely the sort of analysis that policymakers need in a world where optimal solutions are few and far between.

Another frequently employed evaluative criterion, particularly in regulatory policy, is benefit-cost analysis. In most cases, the benefits of the program are calculated in terms of the legislation's stated goals, e.g., the effects of reduced pollution emissions on health and property values, while the costs involve both administrative expenses and the time and monetary costs borne by groups being required to comply. While such studies sometimes simply seek to arrive at a net benefit/cost figure, they frequently also compare the present program with an alternative, e.g., deregulation or a system of emissions fees.²¹ Although such approaches invariably run into problems of accurately estimating both benefits and costs and of estimating the probable effects of alternative programs, they have the advantage of highlighting explicitly the fiscal constraints which are, at least implicitly, part of most policy decisions.

Finally, studies sometimes use an evaluative criterion largely unrelated to prescribed goals. This may be taken from the researcher's own value preferences, such as the program effects on the poor²² or from the program's effects on other societal goals. For example, Ingram and Mann suggest that, while U.S. immigration policy has obviously failed to reach its stated objective of stemming the flow of illegal aliens from Mexico, the policy also should be evaluated in terms of its overall effect on maintaining friendly relations with that country.²³

A second and related topic concerns whether the focus of analysis is on policy *outputs* or the ultimate *outcomes* of a program. On the one hand, Van Horn argues that implementation analysis should only be concerned with measuring the extent to which the policy outputs of the implementing agencies conform to legal objectives—with, for example, the extent to which the Comprehensive Training and Employment Act (CETA) agencies provide jobs for the hard-core unemployed—rather than with the policy's ultimate impacts

on target groups, e.g., the extent to which the long-term employment and earnings potential of low-income people are affected by enrollment in CETA programs.²⁴

Such a circumscribed approach, however, often precludes some of the most interesting and important aspects of implementation analysis, namely, the adequacy of the theoretical assumptions underlying a program and, in regulatory programs, the degree of compliance by those affected by agency decisions. For example, an inquiry confined to the extent to which various social services were delivered to Aid to Families with Dependent Children (AFDC) recipients under the 1962 welfare amendments would have missed the program's inherently limited ability to achieve its basic goal of reducing the welfare roles because such an inquiry would have ignored the program's inability to affect the number of jobs available.²⁵

Of course, there certainly are instances in which statutes make absolutely no pretense of doing anything more than delivering a specific service or regulating a specific type of behavior. But if a statute also seeks to attain an objective, it is entirely appropriate for implementation analysis to ask whether the statute incorporates an adequate understanding of the factors affecting that objective and gives implementing officials sufficient authority to have at least the possibility of attaining it. Many implementation studies make their greatest contributions by revealing the inadequacy of the underlying theory or the limited ability of regulatory agencies to bring targeted groups into compliance.

This wider view is accepted by many if not most people in the field, including Pressman and Wildavsky; Bardach, Majone and Wildavsky; and Browning, Marshall, and Tabb.²⁶ In fact, there may even be a consensus that implementation analysis should examine both the extent to which major legal objectives have been achieved and any other program impacts—intended and otherwise—which affect the amount of support and opposition to the program and eventually the reformulation process. Furthermore, one might consider the role of formal evaluation studies in the reformulation process, as there is now a fairly extensive and rather discouraging literature on the use made of formal impact assessments in the policy process.²⁷

From whose perspective: center, periphery, or target groups?

The implementation of any program involves the effort of some policymaker to affect the behavior of what Lipsky has termed "street level bureaucrats" in order to provide a service to, or regulate the behavior of, one or more target groups.²⁸ Among the conceptually simplest cases, as it involves a single organization, would be the efforts of a local school board to alter the practices of classroom teachers. Of course, most implementation efforts involve more than one organization, e.g., a city council and local bureaucracies, and many involve more than one level of government. In fact, most implementation

studies have probably dealt with the most complex intergovernmental cases, i.e., the efforts of Congress or federal appellate courts to affect the behavior of classroom teachers, local social service caseworkers, or private industrial firms throughout the nation.

Thus the implementation of any program—but particularly those involving many organizations or several levels of government—can be viewed from three quite different perspectives: (1) the initial policymaker, the *center*; (2) field-level implementing officials, the *periphery*; or (3) the private actors at whom the program is directed, the *target group*. From the standpoint of the center, implementation involves the efforts of higher-level officials or higher-level institutions to obtain compliance from peripheral or lower level institutions and officials in order to provide a service or to change behavior. If the program is not working, then either adjustments have to be made in the program or sanctions have to be invoked or the basic policy has to be reformulated. But the basic concerns from the center's perspective are, first, the extent to which official policy objectives have been met and, second, the reasons for attainment or nonattainment. This appears to be the dominant approach in implementation research.

From the standpoint of the periphery, however, implementation focuses on the manner in which local implementing officials and institutions respond to the disruptions in their environment caused by the efforts of outside officials to achieve a new policy. For example, the study by Browning, Marshall and Tabb of the implementation of three federal programs (General Revenue Sharing, Community Development Block Grants, and Model Cities) in ten San Francisco Bay Area cities focuses on the extent to which local political officials and groups used the federal funds to pursue their own goals.²⁹ Similarly, the Rand study of the implementation of educational innovations dealt primarily with factors affecting the adoption of federally sponsored innovations in local school districts and, even more so, with the manner in which those innovations were modified by local school officials and classroom teachers in order to meet the particularities of their specific situations.³⁰ Other examples of this approach would include the Huron Institute's study by Cohen and Farrar of the experimental school voucher program in Alameda County, California, and the analysis by Weatherly and Lipsky of the coping behavior of local school officials involved in the implementation of a Massachusetts special-education law.³¹

Finally, implementation can be viewed from the perspective of the target group—for example, the poor in social welfare programs or sources of emission in pollution control programs. When target groups are the principal beneficiaries of a program, their perspective may be quite similar to that of central authorities: To what extent are the intended services actually delivered?³² But target groups are likely to be even more concerned with whether the services make any real difference in their lives, i.e., does participation in CETA significantly improve the long-term flow of income? In

regulatory programs, the target group perspective is likely to focus on the difficulties encountered in complying with program rules and regulations.

Understanding the perspective of target groups is also likely to be important to central authorities. Such understanding enables them to anticipate political feedback and to be aware of the behavioral assumptions upon which the program is based. For example, a study of welfare recipients in New York City and Chicago concluded that the work-incentive program is based on the erroneous assumption that AFDC mothers do not perceive any negative status to being on welfare and thus need to be prodded into seeking work. While this may be true of some, for many others their expectations of remaining economically dependent result more from past inability to find work or unwillingness to leave small children in day-care centers.³³ In short, the ability to change the behavior of target groups is contingent upon an adequate understanding of their incentive structure.

Detailed case studies of the implementation of local programs or of intergovernmental programs in a few selected areas have been able to combine two or more of these perspectives.³⁴ Unfortunately, though the ideal research design involves both a comprehensive evaluation of the extent to which central objectives are attained and an analysis of the activities and perspectives of central authorities, local implementing officials, and target groups, this is usually precluded by the limited availability of resources for research. When choices have to be made, it would appear that the center-focused perspective is appropriate in those cases when the researcher wishes simply to obtain a general idea of the extent to and the reasons for which official objectives are attained and when the basic policy decision provides reasonably clear objectives and coherently structures the implementation process. But as central objectives become ambiguous and peripheral officials are given more discretion, it becomes more and more crucial to understand the perspectives of the periphery.³⁵ Likewise, an appreciation of the target group's perspectives becomes critical when the program is based upon assumptions about the target group's motivation.

Conclusion

Keeping in mind the various issues and approaches in implementation analysis, we believe that any thorough implementation analysis must address three major issues:

1. To what extent are the policy outputs of the implementing agencies and/or the outcomes of the implementation process consistent with the official objectives enunciated in the original statute, court case, or other authoritative directive? Are there other politically significant impacts?
2. To what extent were the objectives and basic strategies outlined and anticipated in the original directive modified during the course of imple-

mentation or during the period of policy reformulation by the original policymaker?

3. What are the principal factors affecting the extent of goal attainment, the modifications in goals and strategies, and any other politically significant impacts?

The emphasis throughout this book is on developing a general conceptual framework within which an implementation analysis focusing on these issues can take place. The applicability of the framework across a diverse range of public programs is illuminated through an examination of five major public programs.

Structure and organization of this book

Chapter 2 presents our framework of the implementation process. It distinguishes three sets of factors that affect implementation: (1) the inherent tractability of the program being addressed, e.g., the amount of behavioral change intended; (2) the extent to which policy formulators legally structure the implementation process by establishing priorities of goals, the assignment of activities and powers to implementing agencies in order to ensure that goals will be accomplished, and the provisions for supportive constituencies to participate in policy administration; and (3) factors such as the activities of relevant interest groups, the commitment and leadership of implementation officials, and the socioeconomic conditions within which implementation occurs. Such factors are usually beyond the reach of policy formulators but nevertheless are of substantial importance to effective implementation.

In addition to identifying these key variables, the framework subdivides the overall implementation process into five analytically distinct and manageable stages. These stages are: (1) the policy outputs of the implementing agency—what the implementing agency asks or demands of those coming under its jurisdiction; (2) the extent of compliance by those affected—the target groups—with the agency's directives; (3) the perception of agency outputs and the agency's impacts on people and events by both the informed and the mass public; (4) the actual impacts of the program (both intended and unintended); and, finally, (5) the formulators' revisions or attempted revisions of the policy. Following reformulation, the process again goes through the five stages of implementation in what becomes a series of formulation-implementation-reformulation cycles.

In chapter 3 through 7 the framework is applied in the analysis of five specific implementation efforts. The cases were selected on the basis of four criteria:

a. They vary from relatively unsuccessful efforts (new communities in Chapter 3) to moderately successful efforts (school desegregation in the South

in Chapter 5 and compensatory education in Chapter 6) to a fairly successful effort (the California Coastal Commissions in Chapter 7).

b. They vary according to the tractability of the problem being addressed. The problems range from air pollution, which is an extraordinarily difficult problem from technical, economical, and political standpoints (Chapter 4) to coastal protection and new communities, areas which pose far fewer problems of basic knowledge and size of the target groups (Chapters 7 and 3, respectively).

c. They span programs as diverse as education, housing, aid to the poor, civil rights, and environmental protection.

d. While the programs examined are predominantly those of the federal government, federal-state differences are highlighted with the inclusion of the California Coastal Commissions study.

It is our hope that the amount of detail provided on each case is sufficient both to acquaint the reader with the program and enable useful comparisons across programs. Chapter 8 draws together the lessons of the five implementation efforts both in terms of the utility of our framework and, more broadly, in furthering understanding of the implementation process.

For further reflection

1. What theories of politics and power (e.g., Marxist, pluralistic, exchange, bureaucratic, general systems) *most* and *least* emphasize the point that implementation is a very problematic consideration in the policy process?
2. Identify two public programs that in your estimation are being successfully implemented today and two that are not. What are the principal factors affecting that success? How are you defining "success"?
3. It cannot be assumed that persons directly responsible for policymaking are always sensitive to problems of implementation. Find out for yourself. In a policy issue of interest, seek out a state legislator or city council member who helped set that policy and determine how well acquainted he or she is with its implementation—the extent to which policy objectives are being achieved, and why.
4. What attention does the print media give to public policy formation versus its implementation? For a two-week period trace first the number and scope of stories devoted to program enactment, and second stories on the implementation of existing programs. Repeat the exercise for both the *New York Times* (or *Washington Post*) and your leading local newspaper.

Notes

1. Pendleton Herring, *Public Administration and Public Interest* (New York: Russell & Russell, 1956); Avery Leiserson, *Administrative Regulation* (Chicago: University of Chicago Press,

- 1942); Marver Bernstein, *Regulating Business By Independent Commission* (Princeton, N.J.: Princeton University Press, 1955).
2. James March and Herbert Simon, *Organizations* (New York: John Wiley, 1958); Daniel Katz and Robert Kahn, *The Social Psychology of Organizations* (New York: John Wiley & Sons, 1978); Anthony Downs, *Inside Bureaucracy* (Boston: Little, Brown & Co., 1967).
3. David Easton, *A Systems Analysis of Political Life* (New York: John Wiley & Sons, 1965); Charles Jones, *An Introduction to the Study of Public Policy*, 2nd ed. (North Scituate, Mass.: Duxbury Press, 1977).
4. Herring, *Public Administration*; Lesterson, *Administrative Regulation*; Bernstein, *Regulating Business*.
5. Stephen Baily and Edith Mosher, *ESEA: The Office of Education Administrators a Law* (Syracuse, N.Y.: Syracuse University Press, 1968); Jerome Murphy, "Title I of ESEA," *Harvard Educational Review* 41 (February 1971): 35-63.
6. Martha Derthick, *New Towns In-Town* (Washington, D.C.: The Urban Institute, 1972).
7. Jeffrey Pressman and Aaron Wildavsky, *Implementation* (Berkeley, Calif.: University of California Press, 1973).
8. Fred Wirt, *Politics of Southern Equality* (Chicago: Aldine, 1970).
9. Pressman and Wildavsky, *Implementation*.
10. Seymour Seber, "Conditions of Legislative Control," *Journal of Politics* 25 (August 1963): 526-51.
11. Hugh Heclo, *A Government of Strangers: Executive Politics in Washington* (Washington, D.C.: The Brookings Institution, 1977); Richard Nathan, *The Plot That Failed* (New York: John Wiley, 1975); Ronald Randall, "Presidential Power versus Bureaucratic Intransigence," *American Political Science Review* 73 (September 1979): 795-810.
12. A noted exception to the critique of the Great Society is found in Sar Levitan and Robert Taggart, "The Great Society Did Succeed," in *Making Change Happen?* ed. Dale Mann (New York: Teachers College, Columbia University, 1978).
13. Pressman and Wildavsky, *Implementation*; Murphy, "Title I of ESEA"; Erwin Hargrove, *The Missing Link* (Washington, D.C.: The Urban Institute, 1975); Carl Van Horn, *Policy Implementation in the Federal System* (Lexington, Mass.: D. C. Heath, 1979); Martha Derthick, *Policy Making for Social Security* (Washington, D.C.: The Brookings Institution, 1979); Paul Sabatier and Daniel Mazmanian, "The Conditions of Effective Implementation," *Policy Analysis* 5 (Fall 1979): 481-504.
14. Richard Nelson and Douglas Yates, *Innovation and Implementation in Public Organizations* (Lexington, Mass.: D. C. Heath, 1978).
15. Martin Rein and Francine Rabinovitz, "Implementation: A Theoretical Perspective," Working Paper No. 43, MIT-Harvard Joint Center for Urban Studies.
16. Eugene Bardach, *The Implementation Game* (Cambridge, Mass.: MIT Press, 1977); Paul Berman and Milbrey McLaughlin, "Implementation of Educational Innovation," *Educational Forum* 40 (March 1976): 345-70.
17. Giandomenico Majone and Aaron Wildavsky, "Implementation as Evolution," in *Policy Studies Review Annual*, 1978 ed. Howard Freeman (Beverly Hills, Calif.: Sage Publications), pp. 109, 111, 114.
18. Angus MacIntyre, "The Politics of Nonincremental Domestic Change: Major Reform in Federal Pesticide Control Policy" (Ph. D. diss., University of California at Davis, 1980).
19. Ladislav Cerych and Paul Sabatier, *The Implementation of Higher Education Reforms* (Paris: Institute of Education, 1981).
20. Kenneth Culp Davis, *Discretionary Justice* (Urbana: University of Illinois Press, 1969); Theodore Lowi, *The End of Liberalism: The Second Republic of the United States*, 2nd ed. (New York: W. W. Norton & Co., 1979).
21. Almarin Phillips, *Promoting Competition in Regulated Markets* (Washington, D.C.: The Brookings Institution, 1975); Ann Friedlaender, *Approaches to Controlling Air Pollution* (Cambridge, Mass.: MIT Press, 1978).
22. Frank Levy, Arnold Melser, and Aaron Wildavsky, *Urban Outcomes* (Berkeley, Calif.: University of California Press, 1974); Rufus Browning, Dale Marshall, and David Tabb, "Implementation and Political Change: Sources of Local Variations in Federal Social Programs," in *Effective Policy Implementation*, ed. Daniel Mazmanian and Paul Sabatier (Lexington, Mass.: D. C. Heath, 1981): 127-46.
23. Helen Ingram and Dean Mann, "Policy Failure: An Issue Deserving Analysis," in *Why*

- Policies Succeed or Fail*, ed. Helen Ingram and Dean Mann (Beverly Hills, Calif.: Sage Publications, 1980), p. 15.
24. Van Horn, *Policy Implementation*, pp. 9-10.
25. Leonard Goodwin and Phyllis Moen, "The Evolution and Implementation of Family Welfare Policy," in *Effective Policy Implementation*, ed. Mazmanian and Sabatier, pp. 147-68.
26. Pressman and Wildavsky, *Implementation*; Bardach, *Implementation Game*; Majone and Wildavsky, "Implementation as Evolution"; Browning, Marshall and Tabb, "Implementation and Political Change."
27. Martin Rein and Sheldon White, "Policy Research: Belief and Doubt," *Policy Analysis* 3 (Spring 1977): 239-71; Daniel Mazmanian and Paul Sabatier, "The Role of Attitudes and Perceptions in Policy Evaluation by Attentive Elites: The California Coastal Commissions," in *Why Policies Succeed*, ed. Ingram and Mann, p. 107.
28. Michael Lipsky, "Street Level Bureaucracy and the Analysis of Urban Reform," *Urban Affairs Quarterly*, 6 (June 1971): 391-409.
29. Browning, Marshall, and Tabb, "Implementation and Political Change."
30. Milbrey McLaughlin, *Evaluation and Reform: The Case of ESEA, Title I* (Cambridge, Mass.: Ballinger Publishing Co., 1975).
31. David Cohen and Eleanor Farrar, "Power to the Parents: The Story of Education Vouchers," *Public Interest* 48 (Summer 1977): 72-97; Richard Weatherly and Michael Lipsky, "Street Level Bureaucrats and Institutional Innovation: Implementing Special-Education Reform," *Harvard Educational Review* 47 (May 1977): 171-97.
32. Raymond Burby and Shirley Weiss, *New Communities U.S.A.* (Lexington, Mass.: Lexington Books, 1976), Chapter 19.
33. Goodwin and Moen, "Family Welfare Policy."
34. Wirt, *Southern Equality*; Pressman and Wildavsky, *Implementation*; Jerry Mechling, "Analysis and Implementation: Sanitation Policies in New York City," *Public Policy* 26 (Spring 1978): 263-84.
35. Paul Berman, "Thinking About Programmed and Adaptive Implementation: Matching Strategies to Situations," in *Why Policies Succeed*, ed. Ingram and Mann, pp. 205-27.

Chapter 2

A framework for implementation analysis

There are two extremes among those concerned with understanding policy implementation. On the one hand are practitioners who want to know about the implementation process in order to decide which levers they need pull to make a program work. Or, if a program is in the design and formulation stage, they want to know which features should be included in a statute or authoritative directive to best ensure goal attainment. For the implementation analyst to suggest, therefore, that what is really needed to attain a particular goal is to overcome longstanding cultural values or basic tenets of human nature is of little use or interest to practitioners. Their view of implementation is an extremely practical and proactive perspective. If the nuts and bolts answers cannot be provided by implementation analysts, then they have little to offer the real world of policymaking.

On the other hand, social scientists are ever sensitive to the fact that much of what occurs in the course of an implementation effort cannot be changed by policy formulators and implementors. For example, the elimination of theft and fraud may require a change in human nature. Elimination of growing world hunger and poverty may require draconian measures of population control combined with a monumental redistribution of wealth and resources among nations. For most social scientists, then, we are captives of social, economic, and political circumstances that may, with concerted effort over time, be mitigated but never fully erased. Their focus is on the broad picture and a search for general propositions about human behavior and social organizations, rather than on the specific levers that policymakers can manipulate in a particular situation.

Good implementation analysis must appreciate both perspectives; they must: (a) be fully aware of the characteristics of the society within which implementation takes place; (b) know the range of access points where formulators and implementors can influence the course of events; and (c) recognize which overarching social and institutional factors in a specific implementation effort cannot easily be affected through present action, and those, such as increasing the resource base of implementors and stiffening the legal sanctions for noncompliance, which are more amenable to short-term intervention.

Our framework for implementation analysis incorporates those basic, yet usually uncontrollable, factors deemed critical by general social system theorists in determining the capacity for, and constraints on, self-conscious social change. Such factors include available resources, economic capacities, technological know-how, and prescribed (constitutional) political rules. A useful way of thinking about these factors is provided in Hofferbert's general systems model of policy formation which portrays systemic capacities/constraints as a series of narrowing filters through which a policy must travel in moving from conception to actualization.¹ A policy is explained as the result of four general filters extending from the most distant and encompassing historical and geographical setting, to contemporary socioeconomic composition, the beliefs and political behavior of the mass public, and formal/constitutional structure.

The general importance of the several filters is widely recognized. In the words of Eulau and Prewitt, though a community's socioeconomic and other background characteristics may not cause or predetermine policy in a literal sense, nor even be sufficient to "set governance in motion," they do establish the boundaries of possible action. In the broadest sense, then, policymaking is "a purposive response to challenges from the physical and social environment."² The limited empirical evidence available suggests, furthermore, that about half of the variance in policy output can be directly accounted for by the four filters identified by Hofferbert.³ In recognition of their importance, the broad social, economic, and cultural factors are incorporated into our framework through variables such as socioeconomic conditions and technology, public support, attitudes and resources of constituency groups, hierarchical integration (of administrative agencies), and support of agency sovereigns (a chief executive, legislature, or the courts).

A general systems theory approach, however, takes us only so far in understanding the policy process. An adequate understanding of policy implementation must also be based on the contributions which organization theorists and others have made concerning policymaking within those bodies immediately responsible for implementation, that is, public bureaucracies.⁴ In particular, it is generally accepted that governmental agencies are concerned not only with legally mandated goals but also with organizational maintenance and survival. And while these agencies want to maximize their autonomy, tension is created by the fact that they are heavily dependent upon

external institutions—notably their legislative, executive, and judicial sovereigns—for essential legal and financial resources. Furthermore, in any specific policy area, such as education or pollution control, policy formulation and implementation are normally dominated by a “policy subsystem” composed of the relevant agencies, legislative committees, and interest groups at one or more levels of government, all of which may be more or less tightly coupled.

The work on policy subsystems and on resource interdependencies within them explains the emphasis in our framework on sovereigns and interest groups, as well as on the former’s potential ability to structure the behavior of implementing agencies. On the other hand, repeated evidence of “loose coupling” (modest hierarchical integration) within and among the agencies in a policy subsystem contributes to our awareness of just how difficult it is to obtain compliance from “street-level” bureaucrats (lower-level bureaucrats in an agency who are in direct contact with the persons a program is intended to affect), not to mention the external target groups themselves.

Finally, within these broad historical, cultural, and economic conditions and organizational “imperatives,” we posit that the energizing force of the implementation process is the rational pursuit by individuals of their desires for power, security, and well-being. Much of the general theory of organizational behavior, from Simon to Downs, is couched in these terms. Working from this premise, Mancur Olson, Jr., has persuasively demonstrated why it is so difficult for large numbers of people to organize in pursuit of their self-interest.⁵ And virtually every study of legislative behavior assumes that legislators seeking their own reelection work within the constraints and exploit the resources provided in the legislative arena. The preferences of those having the most direct bearing on the implementation process are incorporated into the framework through variables dealing with attitudes of constituency groups, the support of sovereigns, and the commitment of implementing officials.

A conceptual framework of the implementation process

We turn now to the task of spelling out more systematically the crucial variables affecting the policy implementation process.⁶ This begins with a formal definition:

Implementation is the carrying out of a basic policy decision, usually incorporated in a statute but which can also take the form of important executive orders or court decisions. Ideally, that decision identifies the problem(s) to be addressed, stipulates the objective(s) to be pursued, and, in a variety of ways, “structures” the implementation process. The process normally runs through a number of stages beginning with passage of the basic statute, followed by the policy outputs (decisions) of the implement-

ing agencies, the compliance of target groups with those decisions, the actual impacts—both intended and unintended—of those outputs, the perceived impacts of agency decisions, and, finally, important revisions (or attempted revisions) in the basic statute.

In our view, the crucial role of implementation analysis is the identification of the variables which affect the achievement of legal objectives throughout this entire process. These variables can be divided into three broad categories: (1) the tractability of the problem(s) being addressed; (2) the ability of the statute to structure favorably the implementation process; and (3) the net effect of a variety of political variables on the balance of support for statutory objectives. In the remainder of this section, we shall examine each of the component variables and their potential effects.

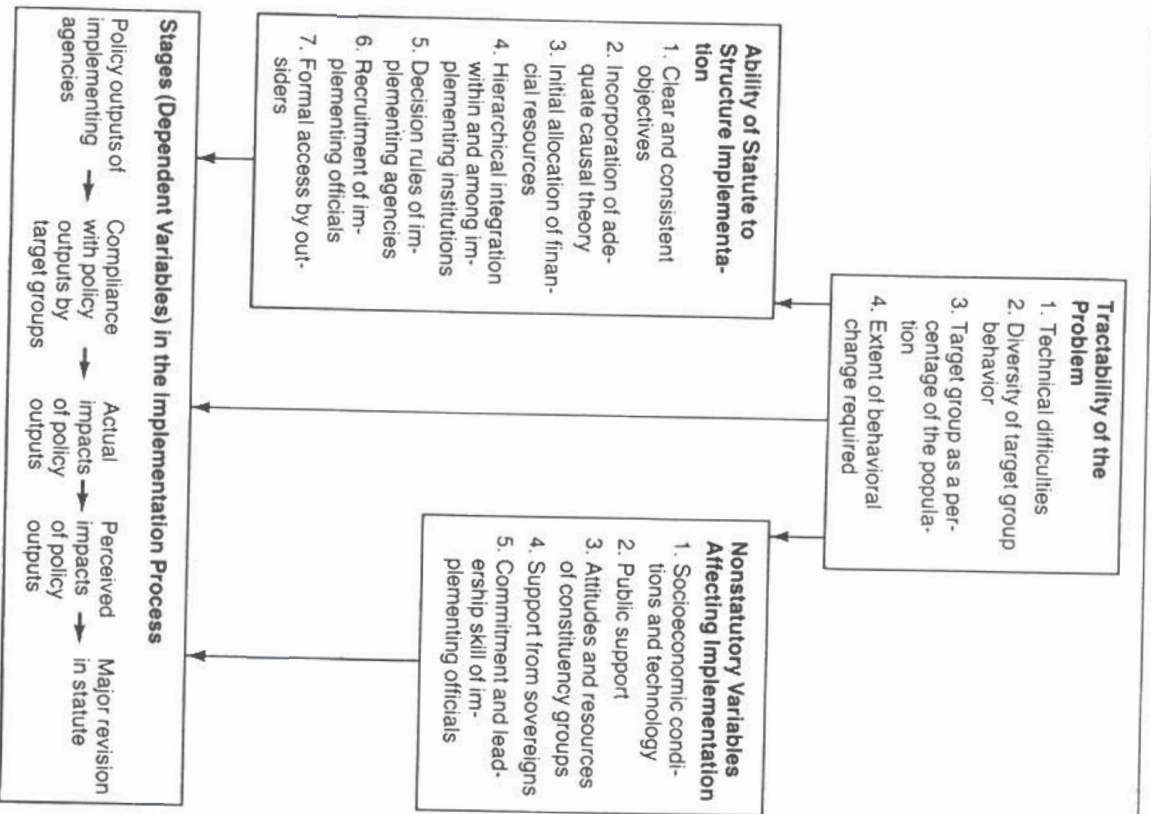
The entire framework is presented in skeletal form in Figure 2.1. It distinguishes the three categories of variables (what might be best thought of as “independent” variables) from the stages of implementation (which can be thought of as the “dependent” variables in the process). It should be noted that each of the stages affects subsequent ones; for example, the degree of target group compliance with the policy decisions of implementing agencies affects the actual impacts of those decisions.

Tractability of the problem(s)

Totally apart from the difficulties associated with the implementation of government programs, some social problems are simply much easier to deal with than others. Preserving a neighborhood in Davis, California, from noise pollution is inherently a far more manageable problem than the safe generation of electrical power from nuclear energy. In the former situation, unlike the latter, there is a clear understanding of the technical aspects of the problem; the behavior to be regulated is not very varied (primarily fraternity parties) and involves only a small subset of the town’s population; and the amount of behavioral change required among target groups is quite modest. The specific aspects of a social problem which affect the ability of governmental institutions to achieve statutory objectives are discussed below. While each is a separate variable, they can be aggregated—at least conceptually—into a summary index of (inherent) tractability.⁷

Technical difficulties The achievement of a program goal is contingent upon a number of technical prerequisites, including an ability to develop relatively inexpensive performance indicators and an understanding of the principal causal linkages affecting the problem. While in some cases, such as the elimination of dual school systems in the South, the attainment of legal objectives posed few technical problems, this is often not the case. As we shall see in Chapter 4, for example, federal air pollution policy has been plagued by difficulties in monitoring ambient air quality and in relating emissions from

Figure 2.1
Variables Involved in the Implementation Process



specific pollution sources causally to ambient air levels and, in turn, to health effects on specific subsets of the population.

Moreover, many programs are predicated upon the availability or development of specific technologies. For example, reduction in sulfur emissions from power plants is contingent upon finding a reliable and relatively inexpensive technology for removing sulfur from coal either before or after it is used in power generation. There has been considerable dispute between the utilities and the Environmental Protection Agency over whether such a technology is presently available. Other social problems beset by serious technological difficulties include pollution emissions from automobiles, the storage of nuclear waste, and agricultural pest control.

The absence of the requisite technology for carrying out new programs poses a number of difficulties for the successful implementation of statutory objectives. First, any program involves costs to taxpayers (in the form of program administration) and to target groups. To the extent that these costs cannot be justified by measurable improvements in the problem being addressed, political support for the program will probably decline and thus statutory objectives will be either ignored or modified. Second, disputes over the availability of the requisite technology will produce strong pressures for delaying deadlines for achieving statutory objectives and considerable uncertainty over the most effective means of encouraging technological innovation—as the problematic implementation of the “technology-forcing” provisions of the 1970 Federal Clean Air Amendments (discussed in Chapter 4) demonstrates.

Diversity of proscribed behavior The more diverse the behavior being regulated or the service being provided, the more difficult it becomes to frame clear regulations and thus the greater discretion which must be given to field-level implementors. Because of the differences in their commitment to statutory objectives, discretion is likely to result in considerable variation in program performance. For example, one of the major obstacles confronting the implementation of the 1972 Federal Water Pollution Control Amendments has been the extreme diversity in the type and seriousness of discharges from the nation’s estimated 62,000 points of major sewage discharge. Such variation makes the writing of precise overall regulations essentially impossible, with the result that regulations for each industry and firm have to be negotiated on an *ad hoc* basis and considerable discretion is left to field personnel in state and local pollution control agencies. On the other hand, there is some indication that this aspect of tractability can sometimes be ameliorated through greater emphasis on economic incentives, e.g., the levying of pollution taxes, rather than the imposition of detailed cleanup regulations.⁸

Target group as a percentage of the population In general, the smaller and more definable (capable of being isolated) the target group whose behavior

needs to be changed, the more likely the mobilization of political support in favor of the program and thus the more probable the achievement of statutory objectives. For example, the successful implementation of the 1965 Voting Rights Act derived in large part from the fact that it applied to a fairly specific set of abuses among voting registrars in only seven southern states. This facilitated the formation of a strong constituency in support of the legislation. In contrast, civil rights measures have been much less successful in dealing with widespread problems such as housing discrimination and *de facto* school segregation. Likewise, the success of the California Coastal Commissions (see Chapter 7) can be partially attributed to the fact that the principal target group (coastal property owners) comprised a much smaller percentage of the state's population than did the potential beneficiaries of the program.

Extent of behavioral change required The amount of behavioral modification required to achieve statutory objectives is a function of the (absolute) number of people in the ultimate target groups and the amount of change required of them. The basic hypothesis is, of course, that the greater the amount of behavioral change, the more problematic will be successful implementation.

In short, some problems are far more tractable than others. This brief review of the variables involved suggests that problems are most tractable if: (1) there is a valid theory connecting behavioral change to problem solution, the requisite technology exists, and measurement of change in the seriousness of the problem is inexpensive; (2) there is minimal variation in the behavior which causes the problem; (3) the target group constitutes an easily identifiable minority of the population within a political jurisdiction; and (4) the amount of behavioral change required is modest. For example, the success of the 1965 Voting Rights Act in drastically improving the percentage of blacks voting in the South can ultimately be traced largely to the first and third reasons, even though the amount of behavioral change required of southern voting officials was considerable. In contrast, the implementation of federal occupational health and safety legislation has been exacerbated by the extreme diversity of the practices being regulated, the extensive amount of behavioral change required (particularly in small manufacturing establishments), and, to a lesser extent, problems in actually measuring health and safety benefits.

Nevertheless, one should be cautious about placing too much emphasis on the tractability of the problem being addressed. After all, one of the goals of policy analysis is to develop better tools—for example, a greater reliance on economic incentives—for addressing heterogeneous problems which demand substantial behavioral change. It is also conceivable that more adequate causal theories, better methods of measurement, and the requisite technologies can be developed during the course of program implementation. Finally, one of the purposes of our framework is to show how even relatively difficult problems can be ameliorated through a more adequate understanding of the

manner in which statutory and political variables affect the mobilization of support necessary to bring about rather substantial behavioral change. It is to an examination of these variables that we now turn.

Ability of policy decision to structure implementation

In principle, any statute, appellate court decision, or executive order can structure the implementation process through its delineation of legal objectives, through its selection of implementing institutions, through the provision of legal and financial resources to those institutions, through biasing the probable policy orientations of agency officials, and through regulation of the opportunities for participation by nonagency actors in the implementation process. In general, legislatures have more potential capacity to coherently structure the process than do appellate courts, although they have considerable difficulty in actually doing so.⁹ Nevertheless, our basic argument is that original policymakers can substantially affect the attainment of legal objectives by utilizing the levers at their disposal to coherently structure the implementation process.

Precision and clear ranking of legal objectives Legal objectives which are precise and clearly ranked in importance serve as an indispensable aid in program evaluation, as unambiguous directives to implementing officials, and as a resource to supporters of those objectives.¹⁰ With respect to the last, for example, implementing officials confronted with objections to their programs can sympathize with the aggrieved party but nevertheless respond that they are only following the legislature's instructions. Clear objectives can also serve as a resource to actors both inside and outside the implementing institutions who perceive discrepancies between agency outputs and those objectives (particularly if the statute also provides them formal access to the implementation process, e.g., via citizen suit provisions).

While the desirability of unambiguous policy directives within a given statute is normally understood, it is also important that a statute to be implemented by an already existing agency clearly indicate the relative priority that the new directives are to play in the agency's programs. If this is not done, the new directives are likely to be delayed and be accorded low priority as they are incorporated into the agency's operating procedures. In short, to the extent that a statute provides precise and clearly ranked instructions to implementing officials and other actors—controlling for required departure from the *status quo ante*—the more likely that the policy outputs of the implementing agencies and ultimately the behavior of target groups will be consistent with those directives.

Validity of the causal theory Every major reform contains, at least implicitly, a causal theory of the manner in which its objectives are to be

attained. In fact, one of the major contributions of implementation analysis—as opposed to simply public administration and organization theory—is its emphasis on the overall theory for obtaining desired changes.

An adequate causal theory requires (a) that the principal causal linkages between governmental intervention and the attainment of program objectives be understood; and (b) that the officials responsible for implementing the program have jurisdiction over a sufficient number of the critical linkages to actually attain the objectives.¹¹ For example, if the major objective of school desegregation in the South was simply the elimination of dual school systems, then the causal theory was relatively simple and basically involved bringing sufficient incentives and sanctions on southern school boards. But to the extent that the objective was to provide equal educational opportunity to children regardless of race, then the theory became much more problematic both in its cognitive and jurisdictional aspects. Not only was there considerable dispute over the factors affecting—and indeed the means of measuring—educational achievement, but the implementing agencies (principally the Office of Education and local school boards) had practically no jurisdiction over the host of factors outside the schools affecting educational achievement.

In fact, inadequate causal theories lie behind many of the cases of implementation failure. Of the cases discussed in this volume, the following were all plagued by serious difficulties in this regard: new towns, automotive pollution control, Title I of ESEA, and—depending on the interpretation of objectives—school desegregation. In fact, only the California Coastal Act provided a generally adequate causal theory. Even in that case, it did so more for some objectives than for others, and program performance was strongly correlated with adequacy of the causal theory.

Initial allocation of financial resources Money is obviously critical in any social services program. It is also required in classical regulatory programs to hire the staff and to conduct the technical analyses involved in the development of regulations, the administration of permit programs, and the monitoring of compliance. In general, a threshold level of funding is necessary if there is to be any possibility of achieving statutory objectives, and the level of funding above this threshold is (up to some saturation point) proportional to the probability of achieving those objectives.¹²

The initial (basic) policy decision establishes the general level of funding. An inadequate level can doom a program before it begins. Conversely, an adequate level (as in Title I of ESEA) can help, but not guarantee, that a program gets off to a decent start. But, except in cases of guaranteed funding (e.g., the California coastal commission and the highway trust fund), any program must come back to the legislature periodically for renewed funding. Thus the appropriations process also serves as an important indicator of the degree of legislative and executive support for a program over time.

Hierarchical integration within and among implementing institutions One of the best-documented findings in implementation literature is the difficulty of obtaining coordinated action within any given agency and among the numerous semiautonomous agencies involved in most implementation efforts.¹³ The problem is particularly acute in the case of federal statutes which rely on state and local agencies to carry out the details of program delivery in a very heterogeneous system. One of the most important attributes of any statute is the extent to which it hierarchically integrates the implementing agencies. To the extent that the system is only loosely integrated, there will be considerable variation in the degree of behavioral compliance among implementing officials and target groups as each responds to the incentives for modification within their local setting.

The degree of hierarchical integration among implementing agencies is determined by (a) the number of veto/clearance points involved in the attainment of legal objectives; and (b) the extent to which supporters of those objectives are provided with inducements and sanctions sufficient to ensure acquiescence among those who have a potential veto. Veto/clearance points involve those occasions on which an actor has the capacity (quite apart from the question of legal authority) to impede the achievement of legal objectives.¹⁴ Resistance from specific veto points can, however, be overcome if the statute (or other basic policy decision) provides sufficient sanctions or inducements to convince the actors (whether implementing officials or target groups) to alter their behavior. In short, if the sanctions and inducements are great enough, the number of veto points can delay—but probably never ultimately impede—compliance by target groups. In practice, however, the compliance incentives are usually modest enough that the number of veto/clearance points become extremely important. Thus the most direct route to a statutory objective, such as a negative income tax, to provide a minimum income level for all Americans, may be preferable to complex health, welfare, and employment programs administered by numerous semiautonomous bureaucracies.

Decision rules of implementing agencies In addition to providing clear and consistent objectives, few veto points, and adequate incentives for compliance, a statute can further influence the implementation process by stipulating the formal decision rules of the implementing agencies.¹⁵ To the extent, for example, that the burden of proof in permit/licensing cases is placed on the applicant and agency officials are required to make findings fully consistent with legal objectives, the decisions of implementing institutions are more likely to be consistent with those objectives. In addition, when multi-membered commissions are involved, the statute can stipulate the majority required for specific actions. In the case of regulatory commissions which operate primarily through the granting of permits or licenses, decision rules

making permit grants contingent upon substantial consensus, e.g., a two-thirds majority, are obviously conducive to stringent regulation.

Officials' commitment to statutory objectives No matter how well a statute or other basic policy decision structures the formal decision process, the attainment of legal objectives which seek to significantly modify target group behavior is unlikely unless officials in the implementing agencies are strongly committed to the achievement of those objectives. Any new program requires implementors who are sufficiently persistent to develop new regulations and standard operating procedures and to enforce them in the face of resistance from target groups and from public officials reluctant to make the mandated changes.

In principle, there are a number of ways in which the framers of statutes can reasonably assure that implementing officials have the requisite commitment to statutory objectives. The responsibility for implementation can be assigned to agencies whose policy orientation is consistent with the statute and which will accord the new program high priority.¹⁶ This procedure is most likely when a new agency is created specifically to administer the statute, as the program will necessarily be its highest priority and the creation of new positions opens the door to a vast infusion of statutory supporters. Alternatively, implementation can be assigned to a prestigious existing agency orientation and is looking for new programs. The statute can often stipulate that top implementing officials be selected from social sectors which generally support the legislation's objectives. For example, several studies of state and regional land use agencies have shown that local elected officials are generally more likely to approve developments than appointees of state officials.¹⁷

The choice of implementing officials is, however, often severely constrained in practice. In many situations, e.g., education, implementation must often be assigned to existing agencies which may be ambivalent or even hostile. And most positions in any agency are held by people with civil service protection. In fact, it is the generally limited ability of program designers to assign implementation to agency officials committed to the program's objectives which probably lies behind many cases of failure to achieve legal objectives.

Formal access by outsiders Another factor affecting implementation is the extent to which opportunities for participation by actors outside the implementing agencies are biased toward supporters of legal objectives. Just as a statute can influence the implementation process through design characteristics of implementing agencies, it can also affect the participation of two groups of actors external to those institutions: (a) the potential beneficiaries and/or target groups of the program; and (b) the legislative, executive, and judicial sovereigns of the agencies.

In most regulatory programs, for example, the target groups do not have problems with legal standing nor do they generally lack the financial resources to pursue their case in court if displeased with agency decisions. In contrast, the beneficiaries of most consumer and environmental protection legislation *individually* do not have a sufficiently direct and salient interest at stake to obtain legal standing and to bear the costs of petitioning adverse agency decisions to judicial and legislative sovereigns. Thus statutes which permit citizens to participate as formal intervenors in agency proceedings and as petitioners in judicial review (in mandamus actions requiring agency officials to comply with statutory provisions) are more likely to have their objectives attained.¹⁸

Statutes can also affect the scope and the direction of oversight by agency sovereigns. On the one hand, as we shall see in the case of Title I of ESEA, requirements for formal evaluation studies by relatively independent observers are probably conducive to the achievement of legal objectives. On the other hand, provisions for legislative veto of administrative regulations in regulatory programs probably hinder achievement of those objectives simply because the target groups are likely to be much better organized and to have more incentives for appealing to legislators than are the beneficiaries of regulation.

In sum, a carefully drafted statute (or other basic policy decision) can substantially affect the extent to which its objectives are attained. More precisely, legislation which seeks to significantly change target group behavior in order to achieve its objectives is most likely to succeed if (a) its objectives are precise and clearly ranked; (b) it incorporates an adequate causal theory; (c) it provides adequate funds to the implementing agencies; (d) there are few veto points in the implementation process and sanctions or inducements are provided to overcome resistance; (e) the decision rules of the implementing agencies are biased toward the achievement of statutory objectives; (f) implementation is assigned to agencies which support the legislation's objectives and will give the program high priority; and (g) participation by outsiders is encouraged through liberalized rules of standing and through provisions for independent evaluation studies.

We recognize, of course, that statutes and other basic policy decisions often do not structure the implementation process very coherently. This is particularly true at the federal level, where the heterogeneity of interests effectively represented, the diversity in proscribed activities, the multiple vetoes and weak party system in Congress, and the constitutional and political incentives for implementation by state and local agencies make it extremely difficult to develop clear goals, to minimize the number of veto points, and to assign implementation to sympathetic agencies. Moreover, adequate causal theories are often either unavailable or unincorporated into legislation. Thus, many programs may, from their inception, be doomed to failure or only modest achievements by the intractability of the problems they address or by the inability of the legislature to structure coherently the implementation

process. The importance of tractability and statutory variables in explaining program success or failure needs to be more adequately examined than has often been the case in implementation research.

Nonstatutory variables affecting implementation

While a statute establishes the basic legal structure in which the politics of implementation take place, implementation also has an inherent dynamism driven by at least two important processes: (1) the need for any program which seeks to change behavior to receive constant or periodic infusions of political support if it is to overcome the delay involved in seeking cooperation among large numbers of people, many of whom perceive their interests to be adversely affected by successful implementation of statutory objectives; and (2) the effect of changes in socioeconomic and technological conditions on the support for those objectives among the general public, interest groups, and sovereigns. In addition to these changes over time, there is usually variation in the antecedent factors identified by Hofferbert—e.g., historical events, socioeconomic conditions, public opinion—among the governmental jurisdictions in which a statute is being implemented.

The policy outputs of implementing agencies are essentially a function of the interaction between legal structure and political process. Whereas a statute which provides little institutionalized bias leaves implementing officials very dependent upon variations in political support over time and among local settings, a well-drafted statute can provide them with sufficient policy direction and legal resources to withstand short-term changes in public opinion. Such a statute also provides considerable capacity to bring about the desired behavioral changes in widely different local jurisdictions.

In this section we will discuss the major nonlegal variables affecting the policy outputs of implementing agencies, target group compliance with those decisions, and ultimately the achievement of statutory objectives. We will begin with clearly external variables, e.g., changes in socioeconomic conditions; move through essentially intervening variables, e.g., attitudes of sovereigns and constituency groups; and deal finally with the variable most directly affecting the policy outputs of implementing agencies, namely, the commitment and leadership skill of agency officials.

Socioeconomic conditions and technology. Variations over time and among governmental jurisdictions in social, economic, and technological conditions affect the attainability of statutory objectives. There are at least four ways in which variation in such conditions can substantially affect the political support for statutory objectives and, hence, the policy outputs of implementing agencies and eventually the achievement of those objectives.

First, variation in socioeconomic conditions can affect perceptions of the relative importance of the problem addressed by a statute (or other basic

policy decision). To the extent that other social problems become relatively more important over time, political support for allocating scarce resources to the original statute is likely to diminish.¹⁹ Second, successful implementation is rendered more difficult by local variation in socioeconomic conditions and, as indicated previously, in the seriousness of the problem being addressed. Such variation produces enormous pressures for "flexible" rules and considerable administrative discretion by local units. In such cases, the policy outputs of implementing agencies are likely to mirror the degree of local support for statutory objectives. Any attempt to impose uniform standards on jurisdictions with widely different situations will only increase opposition from those who must bear costs which appear unjust. In either case, statutory objectives are less likely to be achieved. Third, support for regulation aimed at environmental or consumer protection or worker safety seems to be correlated with the financial resources of target groups and the groups' relative importance in the total economy.²⁰ The more diverse an economy and the more prosperous the target groups, the more probable the effective implementation of statutes imposing nonproductive costs on them. The lower the target groups' economic diversity and prosperity, the more likely the substitution of subsidies for policing regulation. Finally, in the case of policies (such as pollution control) which are directly tied to technology, changes or the lack of changes in the technological state of the art over time are obviously crucial.

In short, as Hofferbert points out, social, economic, and (we add) technological conditions are some of the principal external variables affecting the policy outputs of implementing agencies and ultimately the attainment of legal objectives. These conditions are linked to implementation through changes in interest group and public support for those objectives or through the legislative and executive sovereigns of the implementing agencies. Implementing officials may also respond directly to changes in environmental conditions, particularly if they perceive that those changes support their programs or preferences.

Public support. Variations over time and jurisdiction in public support for legal (statutory objectives) is a second variable affecting implementation. Anthony Downs has argued that public (and media) attention to many policy issues tends to follow a cycle in which an initial awakening of public concern is followed by a decline in widespread support as people become aware of the costs of "solving" the problem, as other issues crowd it off the political agenda, or as scandals arise in program administration.²¹ Conversely, public support may be temporarily reawakened by dramatic new evidence that the problem persists, e.g., another oil spill or nuclear power accident. The episodic, or perhaps cyclical, nature of public concern creates difficulties for the successful implementation of any program requiring periodic infusions of support from sovereigns, either in the form of large budgetary allocations (e.g., Title I of

ESEA) or protection from opponents' counterattacks (e.g., federal pollution control policy).

Variation among political jurisdictions in public support for a particular program is likely to result in pressures for ambiguous regulations and considerable discretion to local officials—both of which probably contribute to the difficulty in changing behavior in a systematic manner. The general public can influence the implementation process in at least three ways:

1. Public opinion (and its interaction with the mass media) can affect the political agenda, i.e., the issues to be discussed by legislators.
2. There is substantial evidence that legislators are influenced by their general constituents on issues salient to those constituents, particularly when opinion within the district is relatively uniform.²²
3. Public opinion polls are often employed by administrators and sovereigns to support particular policy positions. For example, in 1973-74 the Environmental Protection Agency sponsored a survey to refute the belief that the Arab oil embargo had substantially undermined public support for pollution control measures; when the poll essentially confirmed the agency's position, the EPA used this information extensively in an effort to convince Congress not to weaken the 1970 Clean Air Amendments.²³

Attitudes and resources of constituency groups Changes in the resources and attitudes of constituency groups toward statutory objectives and the policy outputs of implementing institutions play a part in the implementation process. The basic dilemma confronting proponents of any program that seeks to change the behavior of one or more target groups is that public support for the program will almost invariably decline over time. Normally, such as environmental quality, consumer protection, or achievement scores of low-income schoolchildren. Such concern wanes as the costs of such programs on specific segments of the population draw away previous supporters and intensify opposition and the public and the media turn to other issues. The essential—and very problematic—task confronting proponents is translating the original widespread support which helped pass the initial legislation into organizations with sufficient membership, cohesion, and expertise to be accepted as legitimate and necessary participants in important policy decisions by both implementing officials and their legislative and executive sovereigns.

On the other hand, opponents of the mandated change—though they may not dominate the implementing agencies—generally have the resources and incentives to intervene actively in the implementation process. Their organizational resources and access to expertise enable them to present their case effectively before administrative agencies and, if displeased with their decisions, to initiate appeals to the legislative sovereigns, to the courts, and to

public opinion. Because opponents can generally intervene more actively over a longer period of time than proponents, most regulatory agencies eventually recognize that if a program is to survive in an unstable political environment, some compromise with the interests of target groups and thus less departure from the status quo than that envisaged by the original statute will be necessary.²⁴

Constituency groups interact with the other variables in our framework in a number of ways.²⁵ First, their membership and financial resources are likely to vary according to public support for their position and the amount of behavioral change mandated by statutory objectives. Second, constituency groups can intervene directly in the decisions of the implementing agencies by commenting on proposed decisions and by supplementing the agency's resources. Finally, such groups have the capacity to affect agency policy indirectly through publishing studies critical of the agency's performance, through public opinion campaigns, and through appeals to the agency's legislative and judicial sovereigns.

Support from sovereigns Sovereigns of implementing institutions provide support for statutory objectives through (a) amount and direction of oversight; (b) provision of financial resources; and (c) the extent of new (i.e., after original statute) and conflicting legal mandates. The sovereigns of an implementing agency are those institutions which control its legal and financial resources. They will normally include the legislature (and, more specifically, the relevant policy and fiscal committees); the chief executive; the courts; and, in intergovernmental programs, hierarchically superior agencies.

One of the major difficulties in the implementation of intergovernmental programs is that implementing agencies are responsible to different sovereigns who wish to pursue different policies. Often, in such situations, when an intergovernmental subordinate is faced with conflicting directives from its intergovernmental superiors and its coordinate sovereigns, it will ultimately lean toward the directives of the sovereigns who will most affect its legal and financial resources over the longest period of time. For example, when a state agency is faced with conflicting directives from a federal agency and the state legislature, primary loyalty is given to the sovereign most likely to affect the agency's vital resources—which, in almost every case, will be the state legislature. In relations between a local agency and its state superiors, however, the situation is not nearly so predictable. Local governments generally have less constitutional autonomy compared with states than do the states compared with the federal government.

Sovereigns can affect the policies pursued by implementing agencies through both informal oversight and formal changes in the agency's legal and financial resources. Oversight refers to the continuous interaction between an agency and its legislative (and executive) sovereigns in the form of formal oversight hearings, consultation with staff and legislators on the key committees, routine requests from legislators concerning constituent com-

plaints, etc. On the one hand, legislative policy committees become increasingly sympathetic to target groups over time, in part as a reflection of changes in the balance of interest group support and in part because constituency casework appears to be weighted toward complaints. On the other hand, legislative sovereigns who support a controversial program can play a crucial role in the achievement of statutory objectives if they have the resources and the desire to do so. Here we come to Eugene Bardach's extremely interesting concept of a "fixer," i.e., an important legislator or executive official who controls resources important to crucial actors and who has the desire and the staff resources to monitor closely the implementation process and to intervene on an almost continuous basis.²⁶

On a more formal level, sovereigns have the authority to alter the legal and financial resources of implementing agencies. There have, for example been statutes which have been essentially destroyed by the courts or through the appropriations process.²⁷ Legislatures also have the authority to revise substantially and even revoke statutes; in fact, the first major effort to do so marks the end of what we have termed the short-term implementation process. But the most frequent effects may well be of a more indirect nature. As indicated previously, almost any statute is affected by policies outside its specific domain. Changes in any of these can strongly affect support for statutory objectives and/or the number of veto points involved in statutory implementation. An agency and its legislative supporters must be aware of these ramifications and make sure that they are explicitly addressed by (subsequent) legislation. In short, the interrelatedness of policy areas in any complex society greatly increases the monitoring responsibility of the protectors of any particular statute and thus the probability that the statute will gradually be undermined through subsequent tangential legislation.

Commitment and leadership skill of implementing officials We come finally to the variable that affects most directly the policy outputs of implementing agencies, namely, the commitment of agency officials to the realization of statutory objectives. This comprises at least two components: first, the direction and ranking of those objectives in officials' priorities; and, second, officials' skill in realizing those priorities, i.e., their ability to go beyond what could normally be expected in using the available resources. The importance of both attitudes and skill will, of course, vary with the amount of discretion afforded administrators.

The commitment of agency officials will partially—and, in some cases, largely—be a function of the capacity of the statute to institute a bias in the implementing agencies through selection of institutions and top officials. It will also be a function of professional norms, personal values, and support for statutory objectives among interest groups and sovereigns in the agencies' political environment. In general, the commitment of agency officials to statutory objectives and the consequent probability of their successful implementation will be greatest in a new agency with high visibility which was created after an intense political campaign. After the initial period, however,

the degree of commitment will probably decline over time as the most committed people become disillusioned with bureaucratic routine and are replaced by officials much more interested in security than in taking risks to attain policy goals.²⁸

Commitment to statutory objectives will contribute little to their attainment unless implementing officials display skill in using available resources to that end. Usually discussed under the rubric of "leadership," this skill comprises both political and managerial elements.²⁹ The former refers to the ability to develop good working relationships with sovereigns in the agency's subsystems, to convince opponents and target groups that they are being treated fairly, to mobilize support among latent supportive constituencies, to present effectively the agency's case through the mass media, etc. Managerial skill involves developing adequate controls so that the program is not subject to charges of fiscal mismanagement, maintaining high morale among agency personnel, and managing internal dissent in such a way that outright opponents are shunted to noncrucial positions.

On the whole, however, leadership skill remains a rather elusive concept. While everyone acknowledges its importance, its attributes vary from situation to situation. Thus it is extremely difficult to predict whether specific individuals will go beyond what could reasonably be expected in using the available resources to achieve program objectives.

Stages (dependent variables) in the implementation process

The discussion thus far has focused on factors affecting the implementation process as a whole. But that process must be viewed in terms of its several stages: (1) the policy outputs (decisions) of the implementing agencies; (2) the compliance of target groups with those decisions; (3) the actual impacts of agency decisions; (4) the perceived impacts of those decisions; and finally, (5) the political system's evaluation of a statute in terms of major revisions (or attempted revisions) in its content. All these stages are often lumped together under the general heading "feedback loop." But there are two separate processes. If one is concerned only with the extent to which actual impacts conform to program objectives, then only the first three stages are pertinent. In our view, however, one should also consider the political system's summary evaluation of a statute, which involves the latter two stages in addition.

Each of these stages can be thought of as an end point or dependent variable. Each is also, however, an input into successive stages. For example, compliance of target groups with the policy decisions of the implementing agencies clearly affects the actual impacts of those decisions. Likewise, the perceived impacts of agency decisions are probably the crucial variable affecting revisions (or attempted revisions) in the statute.

Policy outputs of implementing agencies Statutory objectives must be translated into substantive regulations, standard operating procedures for

processing individual cases, specific adjudicatory (permit, licensing) decisions, and enforcement of those adjudicatory decisions. This process normally requires considerable effort on the part of officials in one or more implementing agencies to provide technical analyses of the manner in which general rules apply to successively more concrete situations and then the actual application of those rules in thousands of specific cases. While most administrative officials can generally be expected to follow legal mandates, some discretion is invariably involved. In many cases—particularly in intergovernmental programs—some implementing officials may be opposed to program goals and thus seek to undermine them.³⁰ One way to deal with these problems is to issue increasingly detailed regulations to limit officials' discretion. However, such "red tape" has its own costs and may be quite harmful to program effectiveness in cases that require the *active* commitment of street-level bureaucrats, particularly those with professional autonomy.³¹ For these and many other reasons, the translation of statutory objectives into the policy decisions of implementing agencies in individual cases is an exceedingly problematic process.

While some discrepancy between statutory objectives and policy decisions is almost inevitable (if for no other reason than disagreements about how general rules apply to specific cases), such differences can be reduced if the statute stipulates unambiguous objectives, assigns implementation to sympathetic agencies who will give it high priority, minimizes the number of veto points and provides sufficient incentives to overcome resistance among recalcitrant officials, provides sufficient financial resources to conduct the technical analyses and process individual cases, and biases the decision rules and access points in favor of program objectives. Conformity of policy decisions with program objectives also depends upon the ability of constituency groups and legislative and executive sovereigns who support the program to intervene actively in the implementation process to supplement the agency's resources and to counter resistance from target groups.

Even under such favorable conditions, however, implementing agencies and the entire political system find it difficult to sustain, over an extended period of time (e.g., more than five years), the tension and conflict inherent in a program that mandates substantial behavioral change. Moreover, as indicated previously, the balance of constituency group support for such a program almost invariably declines over time. For these reasons, we hypothesize that—in the case of such programs—within five to seven years the sovereigns or the implementing officials will (a) change, delay, or ignore the statutory objectives in order to require less change in target group behavior; or (b) reduce opposition through payments of various sorts (e.g., subsidies, tax breaks). In fact, it is probably only through supplementing legal directives with such payments that the policy outputs of implementing agencies can be maintained in a manner consistent with stringent statutory objectives over an extended period of time.³²

Target group compliance with policy outputs Although most Americans generally profess to be law-abiding, several studies of compliance with judicial and administrative decisions have demonstrated that, in practice, behavioral compliance is generally related to individuals' assessment of the relative costs and benefits to them of following legal directives. These same studies have suggested that the decision to comply is, in turn, a function of (a) the probability that noncompliance will be detected and successfully prosecuted; (b) the sanctions available to penalize noncompliance; (c) target group attitudes concerning the fundamental legitimacy of the rules; and (d) the costs to target groups of compliance.³³

In the context of our framework, the probability that substantial sanctions will follow noncompliance is affected by the variety and magnitude of sanctions provided by statute; the resources available to implementing agencies to monitor noncompliance; the ability of constituency groups to supplement agency resources in monitoring compliance and bringing enforcement actions; the commitment of agency officials to prosecuting noncompliance; and the number of veto points involved in actually bringing enforcement actions. With respect to the perceived legitimacy of the rules, the entire literature on civil disobedience certainly indicates that some individuals will risk jail rather than submit to fundamentally unjust laws. On the whole, however, most individuals will modify even behavior based upon deeply held beliefs if the probability that severe sanctions will be invoked is sufficiently high.³⁴

Apart from such instances of rule-rejection, however, any program that seeks to substantially modify target group behavior will involve cases of extreme hardship in which the cost-bearers will vehemently oppose rather than comply. It is precisely to minimize the incidence of such debilitating battles—and the possibility that they will result in court suits which endanger the entire program—that police-power programs need to be supplemented by the provision of side-payments.

Actual impacts of policy outputs Throughout this discussion we have been concerned with the achievement of program objectives. It should now be clear that a statute will achieve its desired impacts if: (a) the policy outputs of the implementing agencies are consistent with statutory objectives; (b) the ultimate target groups comply with those outputs; (c) there is no serious "subversion" of policy outputs or impacts by conflicting statutes; and (d) the statute incorporates an adequate causal theory linking behavioral change in target groups to the achievement of mandated goals.

Although our main concern is the conformity of impacts to legal objectives, there are two other aspects of this stage of the implementation process which merit brief mention. First, the implementation of a statute may—perhaps because of changing socioeconomic conditions or technologies—have substantive impacts not envisaged in the legal objectives. A second important

category of impacts concerns long-term changes in the political strength of competing interests. For example, the mobilization of constituencies as part of program implementation can result in the growth of local political organizations which then elect some of their members to local office and eventually change a wide variety of local programs.³⁵

Perceived impacts of policy outputs While policy analysts and administrators may be primarily interested in the *actual* impacts of the policy outputs of implementing agencies, these are often very difficult to measure in a comprehensive and systematic fashion. Moreover, what may be of most concern in the evaluation of the program by the political system are the impacts *perceived* by constituency groups and sovereigns in the policy subsystem. These perceived impacts may lead eventually to changes in the statutory mandates.

It is our contention that perceived impacts will be a function of actual impacts as mediated by the values of the perceiver. In general, we expect a high correlation between initial predisposition toward a statute and perception and evaluation of its impacts.³⁶ Moreover, in keeping with cognitive dissonance theory, an actor who does not approve of the perceived impacts of a statute will either (a) view those impacts as inconsistent with statutory objectives, (b) view the statute as illegitimate, and/or (c) question the validity of the impact data.³⁷

Major revision in statute Just as the passage of a statute (or other basic policy decision) should be viewed as the starting point for an analysis of implementation, so the revision/reformulation of that statute should be viewed as the culminating stage of the process (although the process may be repeated several times). The amount and direction of changes—or attempted changes—in the legal mandates of implementing agencies will be a function of the perceived impacts of past agency activities; changes in policy priorities among the general public and policy elites as a result of changing socioeconomic conditions; the political resources of competing groups; and the strategic positions of supportive and opposing sovereigns.

In this regard, a few observations are pertinent. First, in the five to seven years after passage of the basic statute, a "fixer" (to use Bardach's term) can play an absolutely crucial role in preventing destruction of—although not necessarily revisions in—an agency's statute. But after ten to fifteen years, it is the balance of constituency forces—and, behind them, changes in social, economic, and technological conditions—which prevail. The reason is simply that any particular fixer, no matter what his or her resources or skill in employing them is, after all, subject to electoral defeat, retirement, or death.

Also, as we have mentioned, because of the declining balance of constituency support for stringent regulatory programs over time and the inability of our political system to tolerate intense opposition from legitimate

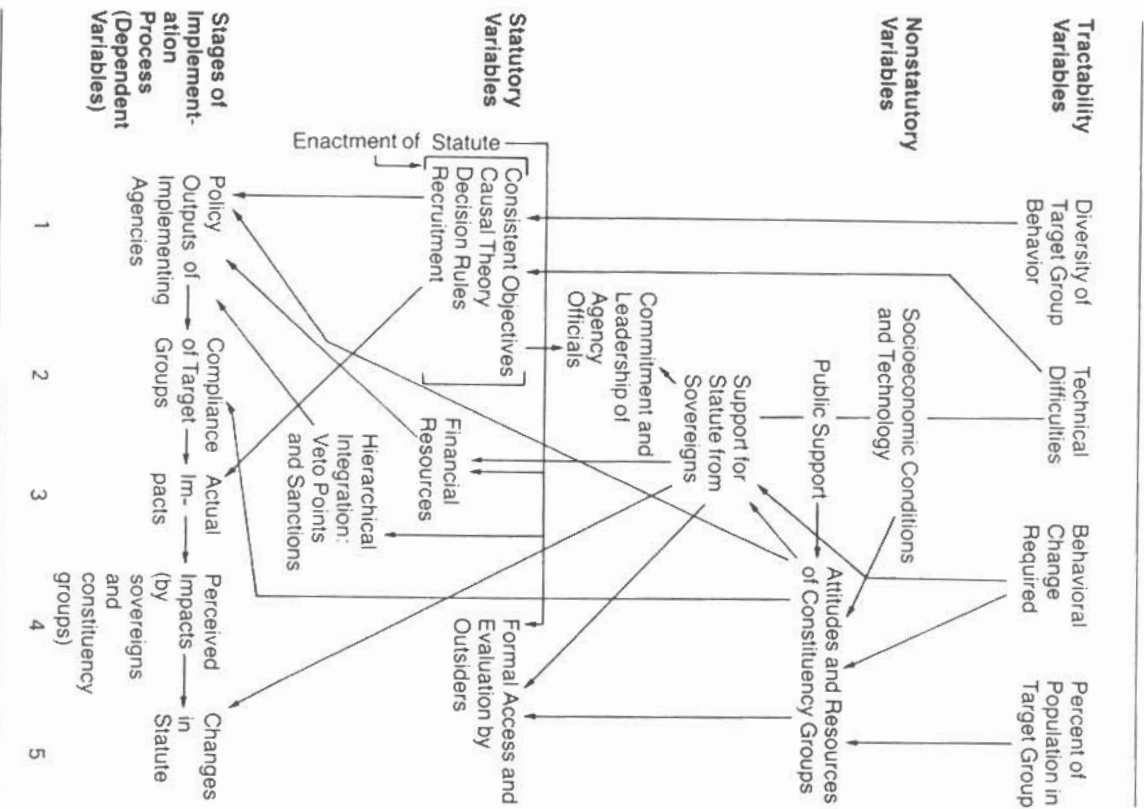
interests over sustained periods, stringent regulatory statutes will invariably be revised to substitute side-payments for some of the more onerous police-power decisions. The result is, then, that only by mixing distributive with regulatory policies can substantial changes in target group behavior be achieved.

Implementation as a dynamic process

Identifying individually the many variables involved in implementation is an important first step in understanding its complexity and in developing an appreciation of the enormity of the task of changing the status quo through governmental action. Moreover, grouping variables by whether they are amenable to statutory manipulation helps distinguish between factors that can be manipulated (in the short term) through formulation and design by policymakers. Yet this provides only a static picture.

Bringing the various facets of the implementation process together and depicting it as the dynamic process that it is, is complicated by the sheer number of variables involved and the fact that interaction among them continues throughout the process. For example, the amount of change one hopes to bring about in a target population will affect the precision required in spelling out policy directives, the adequacy of the causal theory needed, the degree of needed public support, the severity of sanctions required, and so on. Each of these factors is linked to the others so that as one changes, there is a rippled effect throughout the system. In a two-dimensional space it is virtually impossible to depict *all* of the actual interaction patterns and the respective feedback loops. However, for illustrative purposes the major components of the picture are brought together in the flow diagram in Figure 2.2, which incorporates each of the tractability, nonstatutory, and statutory variables, and suggests through the use of arrows where each has a major bearing on the five stages of implementation. Though a truncated picture of the process, the diagram suggests the major linkages among variables, the direction of impacts, and the complexity of the overall process. Thus, we find that the diversity of target group behavior that policymakers wish to change, a key tractability variable, has an important and direct bearing on how a statute is to be written; whether it can be general and sweeping in language or whether it must specify a diverse range of activities and prescribe an equally wide range of remedies. Likewise, the figure highlights the direct influence of public support on sovereigns and constituency groups—both of which, in turn, have a major bearing on each of the stages of the implementation process. Finally, the extraordinary influence of a statute itself in shaping the implementation process—through establishing goals, priorities, incorporating a causal theory, providing adequate resources, etc.—is clearly shown through the series of arrows linking the statute with each major phase of the process.

Figure 2.2
Flow Diagram of the Variables and Stages Affecting the Implementation of a Statute



One must keep in mind that the diagram is only suggestive, however. Though not shown, public support also affects the degree of target group compliance and, ultimately, changes in the status quo. Indeed, the entire implementation process, if it is at all successful, will eventually feed back into the nonstatutory and tractability variables affecting, for instance, socioeconomic conditions and the percentage of the population in the target group. Although the implementation process may be difficult to comprehend fully and depict at this stage of our discussion, the dynamic nature of this process should become quite evident as we deal with specific implementation efforts in subsequent chapters.

Six conditions of effective implementation

While the full framework is designed to be of use to both practitioners and social scientists, we recognize that many students and practitioners would also like a checklist of specific factors to be considered in estimating the likelihood that a particular program will achieve its legal objectives. Chapter 8 contains some guidelines for making such "implementation estimates." We also recognize the list of factors to be considered is somewhat imposing. However, the statutory and political variables can be organized into a set of six sufficient conditions of effective implementation. In other words, a statute or other policy⁸ decision seeking a substantial departure from the status quo will achieve its desired goals if:

1. The enabling legislation or other legal directive mandates policy objectives which are clear and consistent or at least provides substantive criteria for resolving goal conflicts.
2. The enabling legislation incorporates a sound theory identifying the principal factors and causal linkages affecting policy objectives and gives implementing officials sufficient jurisdiction over target groups and other points of leverage to attain, at least potentially, the desired goals.
3. The enabling legislation structures the implementation process so as to maximize the probability that implementing officials and target groups will perform as desired. This involves assignment to sympathetic agencies with adequate hierarchical integration, supportive decision rules, sufficient financial resources, and adequate access to supporters.
4. The leaders of the implementing agency possess substantial managerial and political skill and are committed to statutory goals.
5. The program is actively supported by organized constituency groups and by a few key legislators (or a chief executive) throughout the implementation process, with the courts being neutral or supportive.
6. The relative priority of statutory objectives is not undermined over time by the emergence of conflicting public policies or by changes in relevant

socioeconomic conditions which weaken the statute's causal theory or political support.

Compared to the original variable list in Figure 2-1, this reformulation combines legal variables 4 through 7 into Condition 3. It deals with problem tractability by arguing that, while "high" ratings on all six conditions will always be sufficient to achieve legal objectives, they may not always be necessary. More specifically, while the first two conditions must always be met at least moderately well and all six are necessary in the case of really difficult problems (i.e., those involving significant behavioral change of a substantial subset of the population against its wishes), fairly low ratings on one or two of the last four conditions may not threaten programs involving less widespread change. This is, however, the sort of empirical issue that the case studies in this volume are designed to help answer. While the issue of problem tractability obviously complicates the utility of this approach, the fundamental implication is quite straightforward: the likelihood that legal objectives will be attained is essentially a function of the extent to which the six conditions have been met.

In practice, of course, all six conditions are very unlikely to be attained during the initial implementation period for any program seeking substantial behavioral change. Policymakers sometimes have only a very partial understanding of the causal factors affecting program objectives. Goal conflict and multiple vetoes in the legislature often result in ambiguous objectives, inadequate financial resources, or assignment to one or more implementing agencies unsympathetic to program objectives. But these legal deficiencies can be gradually improved over time if the program has the strong support of key sovereigns (e.g., legislative committee chairmen) and active constituency groups and if evidence arises that program goals are not being attained. If the legislation was passed in a moment of public arousal but lacked the support of critical legislators and organized constituency groups, then proponents must seek to find a "fixer" among key sovereigns and to organize a supportive constituency if the program is to overcome target group resistance and to adjust creatively to changing socioeconomic conditions.³⁸

In short, the list of six conditions can serve not only as a relatively brief checklist to account *post hoc* for program effectiveness or failure but also as a set of tasks which program proponents need to accomplish over time if statutory objectives are to be attained. In fact, the appropriate time span for implementation analysis is probably about seven to ten years. This gives proponents sufficient time to correct deficiencies in the legal framework, and it also tests their ability to develop and maintain political support over a sufficient period of time to actually be able to bring about important behavioral or systemic changes. It also gives the political system sufficient experience with the program to decide if its goals are really worth pursuing and to work out the conflicts with competing values.

Conclusion

In their essay, which was one of the first efforts at conceptual integration of the implementation literature, Rein and Rabinovitz suggested three basic forces or "imperatives" affecting the implementation process: the legal (with its emphasis on statutory intent), the rational-bureaucratic (with its emphasis on workability, consistency, and organizational maintenance), and the consensual (with its emphasis on reaching a *modus operandi* with major interest groups).³⁹ While our framework has incorporated all three factors, it has placed greater emphasis on the legal imperative than have other conceptualizations.⁴⁰ There are at least two reasons for this approach, one empirical, the other normative. On the one hand, we feel that scholars in the so-called behavioral era have tended to ignore the importance of legal variables. Our argument is not with their behavioral focus but rather with their failure to realize that much of bureaucratic behavior may be explained by the legal structure (or lack of such structure) imposed by the relevant statutes. The second reason for focusing on the legal imperative stems from our conviction that, insofar as possible, policy decisions in a democracy ought to be made by elected officials rather than civil servants. Thus, one of our objectives has been to demonstrate the mechanisms whereby legislators and chief executives can formally affect the implementation process through statutory design, as well as to identify the nonstatutory variables which can substantially undermine the attainment of those objectives.

The framework divides the implementation process into five stages and then identifies three groups of independent variables which operate within the context of general causal assumptions taken from general systems theory, principles of organizational behavior, and individual strategizing behavior. Its focus is on the potential for legal structuring of the implementation process and on the need to maintain continuous (or periodic) infusions of political support in the fact of changing social and economic conditions.

For further reflection

1. It has been argued that implementation analysis is simply a new term for public administration. Is this true? Compare the factors examined in one or more of the classics of the administration of public programs [e.g., Philip Selznick, *TVA and the Grass Roots* (Berkeley: University of California Press, 1949); Herbert Kaufman, *The Forest Ranger* (Baltimore, Md.: Johns Hopkins Press, 1960); Pendleton Herring, *Public Administration and Public Interest* (New York: Russell and Russell, 1936)], with the factors enumerated in this chapter.

2. There is more than one view of the best way to conduct an implementation assessment. Compare and contrast the factors emphasized in this chapter with those presented by Eugene Bardach, *The Implementation Game: What Happens After a Bill Becomes a Law* (Cambridge, Mass.: MIT Press, 1977); Carl Van Horn, *Policy Implementation in the Federal System* (Lexington, Mass.: D. C. Heath and Company, 1979); and Richard Elmore, "Backward Mapping: Implementation Research and Policy Decisions," *Political Science Quarterly* 94 (Winter 1979-80): 601-16.
3. Which of the following actors are more likely to have the resources and commitment necessary to serve as a "fixer"? Identify those resources.
 - The president (or governor)
 - Chairman of the legislative committee overseeing the implementing agency
 - A legislator not on an oversight committee
 - The leader of an affected interest group
 - A newspaper reporter or television journalist
 - A district court judge
4. Charles Lave and James March in chapter 3 of their book, *An Introduction to Models in the Social Sciences* (New York: Harper and Row, Publishers, 1975), set forth three criteria for evaluating social science models:
 - Truth* That they are correct, consistent with reality.
 - Beauty* This is simplicity of assumptions, yet producing a large number of interesting predictions with interesting implications that are surprising to us.
 - Justice* That our models contribute to making better worlds.
 - a. How would you rate the framework presented in this chapter in terms of the three criteria?
 - b. Are there any good rationales for developing a conceptual framework that might not satisfy the Lave and March criteria?
5. Select a public program with which you are familiar and briefly sketch out its underlying causal theory. In your view, how adequate is the theory? Enumerate the principal veto points in this program's implementation. [For an illustration of veto point identification see Jeffrey Pressman and Aaron Wildavsky, *Implementation: How Great Expectations in Washington Are Dashed in Oakland* (Berkeley: University of California Press, 1973), Chapter 5].

Notes

1. Richard Hofferbert, *The Study of Public Policy* (Indianapolis: Bobbs-Merrill, 1974), especially chapter 7.
2. Heinz Eulau and Kenneth Prewitz, *Labyrinths of Democracy: Adaptations, Linkages, Representation, and Politics in Urban Politics* (Indianapolis: Bobbs-Merrill, 1973), p. 506.

3. Daniel Mazmanian and Paul Sabatier, "A Multivariate Model of Public Policy-Making," *American Journal of Political Science* 24 (August 1980): 439-68.
4. Among the major influences on our thinking have been Anthony Downs, *Inside Bureaucracy* (Boston: Little, Brown, 1967); James March and Herbert Simon, *Organizations* (New York: John Wiley, 1958); Daniel Katz and Robert Kahn, *The Social Psychology of Organizations* (New York: John Wiley, 1966); Jeffrey Pfeffer and Gerald Salancik, *The External Control of Organizations* (New York: Harper & Row, 1978); Ronald Randall, "Presidential Power versus Bureaucratic Intransigence: The Influence of the Nixon Administration on Welfare Policy," *American Political Science Review* 73 (September 1979): 795-810; Randall Ripley and Grace Franklin, *The Bureaucracy, and Public Policy* (Homewood, N.J.: Dorsey, 1976); A. Lee Frisvolder, *Smoking and Politics*, 2nd ed. (Englewood Cliffs, N.J.: Prentice Hall, 1976); Karl Weick, "Educational Organizations as Loosely Coupled Systems," *Administrative Science Quarterly* 21 (March 1976): 1-19; Richard Elmore, "Organizational Models of Social Program Implementation," *Public Policy* 26 (Spring 1978): 185-228; and Harrell Rodgers and Charles Bullock, *Coercion to Compliance* (Lexington, Mass.: D. C. Heath, 1977).
5. Mancur Olson, Jr., *The Logic of Collective Action: Public Goods and the Theory of Groups* (Cambridge, Mass.: Harvard University Press, 1965).
6. This is a revised version of the framework developed in Daniel Mazmanian and Paul Sabatier, eds., *Effective Policy Implementation* (Lexington, Mass.: D. C. Heath, 1981), pp. 5-24. In addition to numerous editorial changes, the major modification is the deletion of media concern as a political variable. Throughout this framework, the "target group" will be defined as the private actors at whom the program is addressed. In regulatory programs, they are the objects of behavioral change, e.g., pollution sources. In social service programs, they are the intended beneficiaries, e.g., disadvantaged children in compensatory education programs.
7. By "inherent" we mean inherent in the nature of the problem itself, given technical and practical constraints that cannot be removed through human effort (at least not in the short term). Hence our focus on the availability of a valid causal theory, variation in target group behavior, and so on. We do not include the political resources of target groups, as these are included in the discussion of the political resources of constituency groups. For an excellent discussion of intractable problems, see Richard Nelson, "Intellectualizing about the Moon-Ghetto Metaphor," *Policy Sciences* 5 (December 1974): 375-414.
8. See, for example, Charles Schultze, *The Public Use of Private Interest* (Washington, D.C.: Brookings Institution, 1976); Giandomenico Majone, "Choice Among Policy Instruments for Pollution Control," *Policy Analysis* 2 (Fall 1976): 589-614.
9. Lawrence Baum, "Comparing the Implementation of Legislative and Judicial Policies," in *Effective Policy Implementation*, ed. Mazmanian and Sabatier, pp. 39-62.
10. We suggest that the clarity and consistency of statutory objectives be conceptualized along the following ordinal scale:
 1. Ambiguous objectives. These include both meaningless injunctions to regulate "in the public interest" and mandates to balance potentially conflicting objectives, e.g., air quality and industrial employment, without establishing priorities among them.
 2. Definite "tilt." This involves a relatively clear ranking of potentially conflicting rather than general objectives, for example, "improve air quality even if it results in some unemployment."
 3. Qualitative objectives. These involve a rather precise qualitative mandate to, for example, "protect air quality so as to maintain the public health, including that of susceptible populations." Note that this qualitative objective is considerably more precise than that under a "tilt."
 4. Quantitative objectives, e.g., reduce automotive emissions from 1970 levels by 90 percent by December 31, 1975.
11. For analysis of different conceptualizations of causal theory, see Paul Sabatier and Dan Mazmanian, "Policy Implementation," in *The Encyclopedia of Policy Studies*, ed. Stuart Nagel (New York: Marcel Dekker, 1982).

12. Determining what constitutes adequate financial resources is, however, extremely difficult, except to note that it must be related to the seriousness of the problem(s) to be addressed (with per capita expenditures often used as a very crude indicator).
13. See, for example, Jeffrey Pressman and Aaron Wildavsky, *Implementation*, 2d ed. (Berkeley: University of California Press, 1979), chapter 5; Eugene Bardach, *The Implementation Game* (Cambridge, Mass.: MIT Press, 1977), chapters 2, 7; Elmore, "Organizational Models of Social Program Implementation," pp. 199-216; and Paul Berman, "Macro- and Micro-Implementation," *Public Policy* 26 (Spring 1978): 165-79.
14. In calculating the number of veto points, one should distinguish (1) the principal implementing agencies (those which are clearly and explicitly assigned a major role); (2) the secondary implementing agencies (those which can intervene on specific issues); and (3) the target groups. In federal pollution control policy, for example, the first would involve federal, state, and local pollution control agencies; the second would include a variety of land use, transportation, and energy agencies, as well as the federal and state attorney generals (in enforcement actions); and the third would include not only the major sources, e.g., steel mills, but also their unions and suppliers of critical equipment and production resources. Moreover, one needs to sum up the number of clearance points involved in (a) the development of general rules and operating procedures; (b) the disposition of specific cases; and (c) the enforcement of those decisions. It does not take much imagination to realize that the number can become truly staggering. For example, Pressman and Wildavsky counted about seventy clearance points in the EDA public works projects in Oakland, and our analysis of the implementation of the public access requirements of the 1972 California Coastal Initiative (see chapter 7) revealed a minimum of seven major decision points involving nine different institutions in order to open a coastal access or park.
15. On the importance of decision rules, see James Buchanan and Gordon Tullock, *The Calculus of Consent* (Ann Arbor: University of Michigan Press, 1972); and Charles Wright, "A Note on the Decision Rules of Public Regulatory Agencies," *Public Choice* 31 (Fall 1977): 151-55.
16. Downs, *Inside Bureaucracy*, chapter 3. For an example in which choice of the principal implementing agency was a major issue, see Ziguist Zile, "A Legislative-Political History of the Coastal Zone Management Act of 1972," *Coastal Zone Management Journal* 1 (1974): 233-74.
17. Judy Rosentz with Sally Russell and Dennis Brehm, *Environmental vs. Local Control: A Study of the Voting Behavior of Some California Coastal Commissions* (Irvine: University of California, 1977).
18. James W. Wilson, "The Politics of Regulation," in *Social Responsibility and the Business Predicament*, ed. James McKie (Washington, D.C.: Brookings Institution, 1974), 135-68; Paul Sabatier, "Social Movements and Regulatory Agencies," *Policy Science* 6 (Fall 1975): 301-42; Karen Orren, "Standing to Sue: Interest Group Conflict in the Federal Courts," *American Political Science Review* 70 (September 1976): 723-41.
19. For example, the Arab oil boycott of 1973-74 undermined support for implementation of the 1970 Clean Air Amendments as both the general public and political elites became more aware of the effects air pollution control measures had on, for example, increased consumption of natural gas by utilities and the adverse impacts of automotive emission control on gasoline mileage.
20. For the relationship between economic diversity and ability to withstand perturbation (or, in the case of regulation, nonproductive costs), see Jane Jacobs, *The Economy of Cities* (New York: Vintage, 1970).
21. Anthony Downs, "Up and Down with Ecology—The Issue-Attention Cycle," *Public Interest*, Summer 1972, pp. 38-50.
22. Warren Miller and Donald Stokes, "Constituency Influence in Congress," *American Political Science Review* 57 (March 1963): 45-56; Charles Backstrom, "Congress and the Public," *American Politics Quarterly* 4 (October 1977): 411-35.
23. Joseph Vlasas Co., *The American People and Their Environment*. A Report to the Environmental Protection Agency (Springfield, Va.: NTIS, 1973).
24. For the general argument, see Marver H. Bernstein, *Regulating Business by Independent Commission* (Princeton: Princeton University Press, 1955), Chapters 3-8.
25. Constituency groups can supplement an agency's resources by providing technical data and by helping to monitor compliance. See B. Guy Peters, "Insiders and Outsiders: The Politics

- of Pressure Group Influence on Bureaucracy," *Administration and Society* 9 (August 1977): 191-218; Sabatier, "Social Movements and Regulatory Agencies," pp. 301-42.
26. Bardach, *The Implementation Game*, pp. 268-83.
27. Peter Wolf, *American Bureaucracy* (New York: Norton, 1963), pp. 39-40. In general, however, courts are reluctant to overturn agency decisions.
28. Bernstein, *Regulating Business*, chapter 3; Downs, *Inside Bureaucracy*, chapters 2, 16.
29. For discussions of leadership and illustrations of its importance, see Frances Rutke, *Bureaucracy, Politics, and Public Policy*, 2d ed. (Boston: Little, Brown, 1976), pp. 94-101; Martin Levin, "Conditions Contributing to Effective Implementation and Their Limits," *1980 Proceedings of the Association of Public Policy Analysis and Management*.
30. See Carl Van Horn, *Policy Implementation in the Federal System* (Lexington, Heath, 1979); Helen Ingram, "Policy Implementation Through Bargaining: The Case of Federal Grants-In-Aid," *Public Policy* 25 (Fall 1977): 499-526; Christa Alenstetter and James Bjorkman, *Implementation of a Federal-State Health Program* (Berlin: International Institute of Management, 1977); Robert Thomas, "Intergovernmental Coordination in the Implementation of National Air and Water Pollution Policies," in *Public Policy Making in a Federal System*, ed. Charles Jones and Robert Thomas (Beverly Hills, Calif.: Sage, 1976), pp. 129-48.
31. Berman, "Macro- and Micro-Implementation," pp. 165-69; Richard Elmore, *Complexity and Control: What Legislators and Administrators Can Do about Implementing Public Policy* (Washington, D.C.: National Institute of Education, August 1980).
32. The response to the 1970 Clean Air Amendments has, for example, involved both actions: the deadlines for achieving the auto emission reductions have been repeatedly delayed, while payments have included tax credits and low-interest loans for the purchase of pollution and control equipment. Although such subsidies are generally criticized by economists for their inefficient allocation of resources, they are also fully in keeping with what Charles Schultz has termed the "no direct harm" rule of American politics. See Schultz, *The Public Use of Private Interest*, pp. 70-72.
33. Rodgers and Bullock, *Coercion to Compliance*, Chapter 1. See also the relative merits of penalties and incentives in *Law and Policy Quarterly* 2 (January 1980): 3-128. Nelson Rosenbaum and Michael Fix, *Enforcing State Land Use Controls* (Washington, D.C.: Urban Institute Working Paper 1236-01, September 1977); Don Brown and Robert Stover, "Court Directives and Compliance: A Utility Approach," *American Politics Quarterly* 5 (October 1977): 465-80.
34. For example, southern school districts failed to comply with desegregation orders for years, but compliance was achieved in a short period of time when administrative authority was vested in a specific agency and when the 1964 Civil Rights Act and a 1969 court decision enabled officials of that agency to bring very severe sanctions to bear on local districts—specifically, loss of about 67 percent of their total funding (Rodgers and Bullock, *Coercion to Compliance*, chapters 2-4). Moreover, individual parents complied even though many continued to view desegregation rules as illegitimate; see Douglas Galin, Michael Giles, and Everett Cataldo, "Policy Support Within a Target Group: The Case of School Desegregation," *American Political Science Review* 72 (September 1978): 985-95.
35. Rufus Browning and Dale Marshall, "Implementation of Model Cities and Revenue Sharing in Ten Bay Area Cities," in *Policy Making in a Federal System*, ed. Jones and Thomas, pp. 191-216.
36. For evidence in support of this position, see Daniel Mazmanian and Paul Sabatier, "The Role of Attitudes and Perceptions in Policy Evaluation by Attentive Elites: The California Coastal Commissions," in *Why Policies Succeed or Fail*, by Helen Ingram and Dean Mann, Vol. 8 of Sage Yearbook in Politics and Public Policy (Beverly Hills, Calif.: Sage, 1980). For example, about 60 percent of southern school officials who viewed the anticipated impacts of school desegregation as undesirable justified their noncompliance on the grounds that the federal court orders were illegitimate (Rodgers and Bullock, *Coercion to Compliance*, pp. 70-74). For a general review of cognitive dissonance, see Roger Brown, *Social Psychology* (New York: Macmillan, 1965), pp. 584-604.
38. For a slightly more extended discussion of strategies to meet initial program deficiencies, see Paul Sabatier and Daniel Mazmanian, "The Conditions of Effective Implementation," *Policy Analysis* 5 (Fall 1979): 502-4.
39. Martin Rein and Francine Rabinovitz, *Implementation: A Theoretical Perspective*,

Working Paper No. 43 (Cambridge, Mass.: Joint Center for Urban Studies, March 1977), p. 39.

40. See, for example, Bardach, *The Implementation Game*; Donald Van Meter and Carl Van Horn, "The Policy Implementation Process: A Conceptual Framework," *Administration and Society* 6 (February 1975): 445-88; Carl Van Horn, *Policy Implementation in the Federal System* (Lexington, Mass.: D. C. Heath, 1979) chapter 1; Paul Berman, "The Study of Macro- and Micro-Implementation," *Public Policy* 26 (Spring 1978): 1957-84; and Paul Berman, "Thinking about Programmed and Adaptive Implementation: Matching Strategies to Situations," in *Why Policies Succeed or Fail*, ed. Ingram and Mann (Beverly Hills: Sage, 1980) pp. 205-27. For a brief review and critique of much of this literature, see Mazmanian and Sabatier, eds., *Effective Policy Implementation*, pp. 4-5. For a review of much of the case study literature, see Robert K. Yin, *Studying the Implementation of Public Programs* (Golden, Colo.: Solar Energy Research Institute, January 1980).

Chapter 3

New communities: the promise unfulfilled

The basic idea was a very simple and compelling one. Assuming that the dilapidated state of mid-twentieth century American cities is the result of 200 years of more-or-less incremental, generally unplanned expansion, driven primarily by the dictates of commerce and industry, the logical solution to the urban problems created is an entirely new approach to urban living—a holistic approach that would detail a *de novo* preplanned, carefully considered and developed series of new communities (or, as they came to be known, new towns) across the land. Under this new approach community size and growth would be closely regulated and a better balance between the competing needs of residential and commercial uses and human development, environmental protection, cultural amenities, and recreation would be sought. Towns developed under the new plan would provide comprehensive and efficient transportation both within and between communities and, finally, if managed properly, would promote both racial and class integration.

This new approach was the latest in a long, though largely unsuccessful, history of plans to develop freestanding communities in the United States ranging from colonial Philadelphia and Williamsburg to the Mormon settlement at Salt Lake to industrial towns such as Pullman. During the decades of the twentieth century, however, especially during the post-World War II era, growth centered in and around the thirty or so major metropolitan areas of the nation, and memories of the past plans for new communities faded. The idea of new communities received renewed attention in the 1960s, however, for several reasons. First was the growing dissatisfaction with American's urban centers and interrelated health, crime, employment, education, and other urban problems that were not easily solvable, especially