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(Law Enforcement Assistance Administration)
LEAA TASK FORCE REPORT

18321

MAY 14, 1971

TABLE OF CONTENTS

	<u>Page</u>		<u>Page</u>
I. INTRODUCTION	1	Technology Transfer Division	26
II. SUMMARY OF RECOMMENDATIONS	5	Research Plan Panel	26
III. OFFICE OF THE ADMINISTRATION	6	VI. OFFICE OF OPERATIONS SUPPORT	29
Office of Audit	6	Division of Administrative Management	29
Office of Inspection and Review	7	Personnel Branch	29
Office of General Counsel	9	General Services Branch	29
Office of Civil Rights Compliance	9	Publications Management Branch	30
Office of Public and Governmental Liaison	10	Budget and Accounting Branch	31
Division of Public Information	10	Systems Analysis Division	31
Division of Governmental Liaison	10	Program Support Division	31
IV. OFFICE OF CRIMINAL JUSTICE ASSISTANCE	11	Program Fund Review Branch	32
Division of Technical Assistance	12	Contract Procurement Branch	33
Division of Financial and Management Development	13	VII. CHARTS	35
Division of Systems Development	13	Chart No. 1 -- Overall Structure	36
Division of Manpower Development Assistance	14	Chart No. 2 -- Office of Criminal Justice Assistance	37
Regional Offices	16	Chart No. 3 -- Regional Offices	38
V. NATIONAL INSTITUTE OF LAW ENFORCEMENT AND CRIMINAL JUSTICE	21	Chart No. 4 -- Institute	39
Research Administration Division	22	Chart No. 5 -- Office of Operations Support	40
Statistics Division	23		
Research Operations Division	23		

I. INTRODUCTION

The Task Force -- appointed by then Administrator-designate of the Law Enforcement Assistance Administration Jerris Leonard -- began work March 29, 1971.

During the next six weeks the Task Force was thoroughly briefed by the Administrator, Associate Administrators and staff of LEAA. These briefings provided an overview of the purposes and operation of the Administration. The Task Force also made visits to a selected number of regional offices and state planning agencies. It reviewed appropriate parts of the Omnibus Crime Control and Safe Streets Act of 1968 and amendments, as well as LEAA directives, manuals, reports and explanatory documents. It called for and received individual recommendations from staff members of LEAA and statements of goals and objectives from LEAA officials. It consulted with individual staff members to gain further information and understanding of LEAA operations.

In presenting this report, the Task Force is virtually unanimous in all recommendations. Whatever minor differences occurred simply involved alternative approaches.

It is clear from a reading of the Act and its amendments that the appropriate goals of LEAA as mandated by the legislation are to assist state and local governments in reducing the incidence of crime and to increase the effectiveness, fairness and coordination of law enforcement and criminal justice systems at all levels of government -- and move specifically, to encourage state and local governments to adopt comprehensive plans of law enforcement, to make grants and provide technical assistance and guidance to assist them in strengthening their law enforcement systems, and to encourage and conduct research directed toward the development of improved methods for the prevention and reduction of crime and the detection and apprehension of criminals.

Implicit in the legislation is that LEAA cannot itself directly deal with crime, but rather that LEAA must provide leadership, direction, and assistance in combatting crime which, the Act states, is a local problem that must be dealt with by state and local governments if it is to be controlled effectively.

Also implied in the block-grant concept embodied in the legislation is the belief that more power and authority should be shifted from the Federal government to state and local governments. President Nixon has proposed revenue-sharing as a major step in this direction.

The block grant provisions of the act as well as the nature of LEAA's program serve to aid in the achievement of this goal.

In attempting to determine the kind of program and organizational structure needed by LEAA to most effectively carry out its mission, the Task Force considered the problems and weaknesses in the present structure. It also established goals that the new proposed structure should achieve. These include:

1. Greater delegation of authority to:
 - a. Improve the delivery system.
 - b. Improve LEAA's effectiveness in the field.
 - c. Balance the workload to avoid cyclic crises.
 - d. Improve manpower utilization.
2. Strengthen lines of authority.
3. Create a structure amenable to an "impact" concept.
4. Create a structure readily adaptable to:
 - a. Program changes.
 - b. New program responsibility.
5. Consolidate allied functions to avoid duplication of efforts.
6. Create a vehicle for continuous program planning and evaluation.
7. Improve the viability, productivity, and impact of research and information dissemination.

The essential thread running through the entire Task Force recommendation is the decentralization of the LEAA operation by expanding markedly the authority and responsibility of the regional offices as the best means of improving the delivery system. To provide that the regional offices will be able to carry out their expanded responsibility, substantial increases in staff and resources are recommended for these offices. Related to this is the recommendation that the Washington Office place greater emphasis on leadership, policy-making, support and coordination functions, and shift the major responsibility for execution to the regional offices.

LEAA must develop stronger relationships with state and local decision makers -- executives and legislative leaders-if the intended LEAA mission is to be achieved. It is hoped great strides will be taken in this direction

through strong regional directors, substantial increases in regional staff personnel, and the overall recommended structure, mainly within the newly proposed Office of Criminal Justice Assistance.

President Nixon, in fact, has asked the Director of the Office of Management and Budget to join with the heads of the nine departments and agencies in a review of existing relationships between centralized authorities and their field operations. In the President's own words.

"This review is designed to produce specific recommendations as to how each agency: (1) can eliminate unnecessary steps in the delegation process; (2) can develop organizational forms and administrative practices which will mesh more closely with those of all other departments; and (3) can give more day-by-day authority to those who are at lower levels in the administrative hierarchy. Decentralized decision-making will make for better and quicker decisions -- it will also increase cooperation and coordination between the Federal Government on the one hand and the states and localities on the other. Those Federal employees who deal every day with state and local officials will be given greater decision-making responsibility."

The Task Force believes much more stress must be placed on developing an "impact" concept -- gearing operations for maximum impact on the problem. This requires intensive planning and evaluation -- setting objectives, priorities and goals, and measuring results. For this reason, the recommendation is made -- to be expanded later in this report -- that a high level Inspection and Review Office be established as a staff function to the Office of the Administration. Likewise, a strengthening of the external audit function is recommended with the general guideline and goal of shifting the financial audit function to state audit agencies to be assisted and guided by LEAA.

Thus, a major thrust of the Task Force's recommendation is that a structure be developed and a general operating policy be established that are directed toward more concentration and impact in specific areas. It appears that presently there is a tendency to spread resources too thinly so that many efforts have developed minor results, and even those that may have made significant impacts are difficult to measure.

One important way in which this "impact" concept can be implemented is by moving Institute efforts in this direction, and by proper application of discretionary and technical assistance funds.

Another major thrust of this recommendation is to consolidate allied functions to avoid duplication of effort, mainly by shifting all purely support and administrative functions to the newly proposed Office of Operations Support so that the program and substantive areas can better concentrate on their missions.

The following, then, constitute the specific Task Force recommendations.

II. SUMMARY OF RECOMMENDATIONS

The Task Force recommends that LEAA be restructured into eight offices directly responsible to the Office of the Administration.

Five of these would be staff function offices dealing with:

- Audit
- Inspection and Review
- General Counsel
- Civil Rights Compliance
- Public and Governmental Liaison

Three would be line function offices dealing with all operations of LEAA other than staff functions.

- Criminal Justice Assistance
- Institute
- Operations Support

The first part of the following report deals with the five staff function offices.

The second, third and fourth parts deal with each of the line function offices.

Note where necessary and appropriate, offices are broken down into divisions, divisions into branches, and branches into sections, in accordance with normal government nomenclature.

III. OFFICE OF THE ADMINISTRATION

The Task Force recommends the staff functions for the Office of the Administration be divided among five offices, as follows:

1. That the Office of Audit be established as responsible solely to the Office of the Administration without any organizational ties to any other LEAA office. Presently, the Audit function is administratively linked to the Office of Administrative Management.
2. That an Office of Inspection and Review be established as the planning and evaluation staff arm of the Office of Administration.
3. That the Office of General Counsel and the Office of Civil Rights Compliance serve as separate staff functions to the Office of the Administration.
4. That the Office of Intergovernmental Liaison be separated from the Office of General Counsel (which apparently has already been accomplished operationally); and that the Public Information function be merged with the Intergovernmental Liaison function in the Office of Public and Governmental Liaison.

Office of Audit

In view of the sensitivity of criminal justice operations, the relative novelty of the state planning system created by LEAA, and a considerable local disdain for compliance with Federal regulations on grant funds, it is strongly recommended that the Audit Office be clearly established in direct relation to the Administrator.

LEAA's Audit Office should adopt the objective of removing itself from direct financial audit and aim instead at producing state capability to provide this audit under proper guidelines. This will free manpower for more intensive work in program and performance audit which badly requires attention. Greater investigative ability should also be developed to improve the potential for short-notice examination of reports of questionable situations.

The Task Force recommends that by the beginning of the next calendar year, LEAA should have a staff capable of carrying on its audit responsibilities without departmental assistance. Internal audit, including audit of regional offices, should be carried on by the Department of Justice.

Office of Inspection and Review

The Task Force recommends that an Office of Inspection and Review be established immediately within the Office of the Administration to provide leadership, supervision, and coordination for LEAA's planning and evaluation activities. The jurisdiction of this Office will extend to all of LEAA.

A small staff of four to six professional employees headed by a Senior Specialist is recommended. With strong support from the Administrator and Associate Administrators, a small office can provide an effective planning and evaluation program by drawing upon the resources of LEAA's line operations.

The Office should define, quantify, and establish goals and objectives for each program within LEAA, and for the LEAA program as a whole. The Office will be responsible for developing the process by which LEAA's goals and objectives are established. This will involve initiating or soliciting proposed goals and objectives from both within and outside LEAA (note Attorney General Mitchell's directive to LEAA to participate with state and local governments in establishing national standards and goals); coordinating proposed goals and objectives among all interested LEAA divisions; and recommending goals and objectives to the Administration for establishment. The Office will assign priorities and develop procedures whereby the resources of the agency will be committed most heavily to the highest priority goals and objectives. Both discretionary and technical assistance funds should be more carefully focused on the highest priority targets of the LEAA program. The Office can assist the Administration by developing procedures to see that the use of discretionary and technical assistance funds are generally consistent with the established objectives and highest priorities of the agency.

The Office will develop timetables for meeting established goals and objectives, and identify program managers responsible for meeting those schedules.

The Office will assure that an adequate performance measurement system is established to provide periodic Administration review of progress toward planned goals and objectives. The Office primarily would have a planning, monitoring, and general supervisory role with respect to timetables and performance measurement. For actual implementation the Office would rely heavily on the management evaluation staff in the Office of Operations Support.

The Office will assure the planning and development of management information which will support performance measurement and related management functions, and provide information and data necessary for special studies and program performance evaluation. This function is primarily one of planning and coordination. The necessary information system must be carefully planned (this is now beginning through a contract for a GMIS), coordinated, and refined when operational in order to be useful for management purposes. In both planning and implementation of a system, the Office will draw heavily on the resources of all LEAA line divisions.

Where progress toward established goals is not made, the Office will recommend and monitor studies or analyses to determine the reasons for lack of progress, and steps that should be taken to improve progress.

The Office will promote the development of evaluation standards, guidelines, data requirements, etc., to be applied to individual grants and projects. It will assure that results of project evaluations are effectively reported, organized, collated, and disseminated through LEAA's information and technical assistance channels.

The Office will assure that adequate technical assistance in evaluation is being provided by responsible LEAA divisions and offices to SPA and other grantees.

The Office will encourage research and development initiatives (by the Institute or others) in areas involving new or improved methods of evaluation. This could include direct methodological studies (e.g., how to evaluate police patrol tactics in a small city); or evaluation of a particular program likely to result in improved evaluation methods (e.g., evaluation of the LEAA-funded six-state organized crime intelligence systems); or large scale evaluative efforts (e.g., pilot cities).

Finally, the Office will review budget plans, determine their relationship to LEAA's established objectives and goals, and provide independent advice to the Administration on budget levels and allocations. While the budget advisory role is most important, great care must be taken that the very small staff of the Office does not become involved in the budget preparation process. Its function should be restricted to policy advice on budget plans. All budget preparation activities should be carried out by the Office of Administrative Management.

The clear vesting of executive authority in the Administrator as well as the Administrator's express intention that all employees have personal access to him, indicate that heavy demands will be placed on his time for the resolution of personnel questions. Particularly in the transitional period the Administrator may wish to call on the Inspection and Review staff to assist him in resolving personnel problems brought to his attention either individually or through the line channels.

Office of General Counsel

The Task Force recommends that the Office of General Counsel continue its present function. It further recommends that the head of this Office be designated Assistant Administrator and General Counsel.

Office of Civil Rights Compliance

The Task Force recommends that an Office of Civil Rights Compliance be established which reports directly to the Office of Administration.

This Office should be directed by an Attorney who is well versed in the statutes, orders, rules, and regulations pertaining to civil rights.

This Office will develop procedures and guidelines for the operations of an audit system to inspect law enforcement assistance programs for compliance with civil rights statutes, orders, rules and regulations, including those established by the Office of Administration. It will submit proposals to the Office of Administration for approval. When approved, such proposals would become policy. It will develop and submit proposed changes to such procedures and guidelines in the same manner.

The Office should evaluate the law enforcement assistance programs to insure compliance with civil rights statutes, orders, rules, and regulations. Under the guideline of the Office of Administration, it should prepare correspondence to those state and local governments whose program contain Civil Rights violations to persuade them to eliminate such violations.

This Office should be responsible for preparing significant and difficult cases arising under violations of the various civil rights statutes, orders, rules, and regulations in order to present such cases to other Divisions of the Department of Justice for prosecution by trial. It should operate directly with trial attorneys in such cases to provide legal assistance and additional evidence as needed.

This Office is charged with advising the Office of Administration on matters relating to legal and civil remedies in the enforcement of civil rights statutes, and shall prepare legal opinions for the Administrator on civil rights matters.

This Office shall make recommendations concerning the development of programs, procedures, approaches, and techniques to reduce the number of occasions of interference with, or violations of, civil rights criteria contained in statutes, orders, rules, and regulations. It shall determine adequacy of existing civil rights legislation and recommend additional legislation needed to remedy certain violations which cannot be removed under present statutes.

This Office shall also perform special assignments of importance for the Administrator concerning persuasiveness in personnel contacts, legal acumen, and a thorough understanding of the objectives of the Office of Administration.

Office of Public and Governmental Liaison

This office, headed by an Assistant Administrator, would be divided into the Division of Public Information and the Division of Governmental Liaison, each headed by a director.

The Division of Public Information should serve the Office of the Administration in representing LEAA to the press and other LEAA publics, as follows:

- Respond promptly to press requests for information about the general LEAA program and specific newsworthy actions of interest to the public and arrange interviews when requested by the press.
- Prepare news releases and arrange news conferences and briefings to disseminate newsworthy information about the LEAA program.
- Write speeches and other presentations as requested by the Office of Administration.
- Prepare the monthly LEAA Newsletter.
- Prepare the LEAA annual report.
- Perform other public information functions as directed by the Office of Administration.

The Task Force recommends that the present Public Information function of producing and editing brochures and other related materials be reassigned to the appropriate program areas and to the Publications Branch in the Division of Administrative Management for which the Task Force recommends employment of technical writers and editors.

The Division of Governmental Liaison should assist the Administration in maintaining liaison with and servicing Congress and the Executive, and Executive and legislative officials at the state and local level. Specifically, the functions as outlined in the "Functions of the Office of Intergovernmental Liaison" paper should be continued.

IV. OFFICE OF CRIMINAL JUSTICE ASSISTANCE

In surveying the structure and the responsibilities assumed by the Office of Law Enforcement Programs the Task Force determined that this office has encumbered itself with a multitude of tasks that could be performed more efficiently elsewhere within the Administration. The result of this accretion of responsibility has tended to dilute the expertise residing within the office, to channel it into the performance of administrative tasks, and to minimize the capacity of its personnel to provide the technical assistance and policy development contemplated by the basic legislation.

The concentration of man-hours on multiple reviews of state plans and discretionary grants has tended to produce an inefficient workload cycle, duplicative effort, and a confusion as to goals, all of which tends to maximize the possibility of a disruption of the Administration's fund flow. The basic objectives of this office "to provide financial and technical assistance" and "to aid the development of Administration policy" have tended to be lost in a morass of paperwork.

The task Force recommends the transfer of the final review responsibility for planning grants, block grants, and most of the discretionary grants to the regional offices. This delegation will serve to free the personnel of the Office of Law Enforcement Programs from such work and direct their efforts and expertise into providing support for regional offices and policy determination.

The Task Force also recommends the transfer of a major segment of the technical assistance responsibility from Washington to the regional offices.

It is therefore recommended that the Office of Law Enforcement Programs, as presently structured, be abolished and its responsibilities and personnel be reassigned within the Administration.

The Task Force recommends that in lieu of the Office of Law Enforcement Programs there will be established an Office of Criminal Justice Assistance under the direction of an Assistant Administrator.

The Office of Criminal Justice Assistance should provide financial and technical assistance to the regional offices and to the state planning agencies in the development and implementation of plans and programs -- and of the management techniques most useful in that implementation -- in the criminal justice field. The Office should also

perform a support function for the Administration by providing input into policy formulation. It should be responsible for development of short and long range goals to strengthen and improve the criminal justice system at every level of state and local government.

Technical Assistance Division: In implementing this responsibility the Office of Criminal Justice Assistance should establish a Technical Assistance Division. The Division should be staffed with personnel having expertise in a broad range of criminal justice sciences and disciplines, and should include but not be limited to the areas of police, courts, and corrections. In compliance with statutory directives the Office should contain program specialists in the areas of organized crime and civil disturbances. It is further recommended that this office develop expertise in the areas of narcotics and juvenile delinquency in order to properly assess and combat these growing areas of social disorder.

The Division, with a broad range of experts in the criminal justice field, should provide the primary source of support for the regional offices. The individual expert should function within his field to draw together the latest in operational and scientific knowledge. He should define and evaluate the problems within his speciality and be knowledgeable in the area of studies and projects directed toward the solution of these problems. The personnel of this Division should be capable of a broad overview of the criminal justice system in order to complement each other and maximize the impact of the Division on the entire system. The inter-relationship of this expertise should provide a basis for policy formulation within the Administration. It should define those areas within the criminal justice system that are most susceptible to modification and change, and, after evaluating alternatives, recommend those areas where comprehensive and systematic funding will produce substantial improvements.

In establishing a support capability for the regional offices the Division should provide the regional offices with the benefits of its broad national overview. Programmatic or operational advances having national application should be disseminated and their utilization should be encouraged. The personnel of this Division should further develop as specialists in problem identification and resolution, and they should assist in developing that capability in the regional offices. They should know where the best manpower in the entire criminal justice system is, what its capabilities are, and how to recruit it or utilize it to strengthen particular programs.

As a functional mechanism this Division should actively participate in the development of the grant guidelines that must define the regional offices' grant responsibilities. It should make its expertise available to the regional offices to aid them in developing the plans of the SPA's and providing impetus to ongoing programs. The Division, in conjunction with the regional offices, should focus as much as possible on pre-plan advisories in dealing with the SPA's.

The Division should also have advisory responsibility in the development of manuals, handbooks, and instructional materials to assist the regional offices. It should also prepare, under the direction of the Assistant Administrator, field directives for the guidance of the regional offices.

The Division should after consultation with the regional offices convene such meetings, conferences and seminars as shall be considered necessary to provide instruction, guidance, and inter-regional coordination.

Division of Financial and Management Development: In reviewing the operational aspects of administration the Task Force concluded that without the development of a degree of expertise in the fiscal and management operations of the SPA's the fund flow mechanism could not effectively perform. It therefore recommends that the Office of Criminal Justice Assistance establish a Division of Financial and Management Development to support the regional offices. In cooperation with the regional offices this Division should assist the state planning agencies and sub-grantees in developing a permanent cadre, capable of performing within the federal guidelines established by fiscal and budgetary directives. It should also assist in improving the capabilities of state planning agencies in management and program implementation techniques.

This Division should be responsible for the production of manuals and guidelines in the area of fiscal, budget, planning, and program implementation, and in furtherance of this responsibility should plan and conduct training seminars and such other regional and inter-regional meetings as are necessary.

System Development Division: The Task Force further observed a need to redirect the thrust of the System Analysis Center of the National Criminal Justice Information and Statistics Center to more effectively augment its technical assistance responsibilities to state and local agencies. It is recommended that this be accomplished by the creation of a Systems Development Division within the Office of Criminal Justice Assistance.

This office should have as its primary mission the responsibility of providing technical guidance and assistance to the states in the use of computers and information systems for the criminal justice process. All in-house systems analysis responsibilities that are not commensurate with the primary mission of this Division should be severed and transferred to the Office of Operations Support. The Division of Systems Development, in view of the interface of program considerations with the Statistics Center, should maintain a close and continuing liaison with that Center.

Division of Manpower Development Assistance: The Task Force recommends that the program functions of the Office of Academic Assistance (OAA) be expanded and reassigned to the newly proposed Division of Manpower Development Assistance (MDA) under the proposed Office of Criminal Justice Assistance, that OAA's non-program functions be reassigned to the newly proposed Office of Operations Support, and that a great degree of authority and responsibility under the Law Enforcement Education Program (LEEP) be given to the LEAA regional offices.

A recent law enforcement publication pointed out that since the Wickersham Commission report of 1931, ample evidence has developed to support a national need for improved law enforcement education and training. There is a prime need for recruit training, specialized training, supervisory training, and professional training and education. This was reemphasized by the President's Crime Commission report published in 1967, and just recently a Federal Commission concluded after an 18-month study that many police departments across the country are staffed with poorly trained officers, who never should have been recruited in the first place.

It is not only pure vocational training that is needed, but also a broader educational exposure to the liberal arts. The policeman assigned to our streets to regulate, direct, and control human behavior must be armed with more than a gun and the ability to perform mechanical movements in response to a situation. He is required to engage in the difficult, complex, and important business of human behavior. Thus his intellectual armament should be equal to his physical prowess.

LEAA in general and OAA in particular have made a fine beginning in attempting to meet the need, but bolder and more effective efforts must be undertaken. Specifically, more must be done to encourage and assist state and local law enforcement agencies to raise their training standards and strengthen their training programs. In the area of curriculum development, LEAA must provide leadership. As Dr. Donald Riddle, President of the John Jay College of Criminal Justice, points out, colleges have the expertise to build curricula, but they must know what is needed or they will make decisions on their own. In fact, he says, community colleges in general have developed curricula aimed at turning out patrolmen as the colleges imagined them to be. The four-year institutions have aimed at either middle management or top level management, again, in their notion of what is required for those positions.

Specifically, the Task Force recommends:

- The regional offices be given the authority for awarding allotments of LEEP funds to eligible institutions within their regions starting with the 1973 appropriations of LEEP funds (for the 1972-73 academic year). The theory behind this is that since the regional offices are closer to and have more direct knowledge of the institutions, the delivery and monitoring systems would be made more efficient. Also, because of the regional offices' close contact with law enforcement training programs, the offices are in a better position to prevent duplication between training and education efforts. Regional evaluation panels should be set up to help assure the most appropriate allocation of LEEP funds.
- The policy-making authority should remain in Washington, including setting criteria for determining school eligibility; emphasis on where funds should be channeled, and allocation of funds to each region, using the percentage of the total action grant dollars of the states within each region as the ratio to determine the allocation, plus the number of institutions and the manpower needs to be served in the region.
- The policy and guidelines for allocating LEEP funds should place greater emphasis on serving in-service personnel and programs and set as their first priority the meeting of the educational needs of every in-service officer who seeks LEEP aid and encouraging greater numbers to take advantage of this program.
- LEAA's role in connection with pre-service four-year and graduate programs should be to diagnose the need and help prescribe the curriculum so that eventually this program -- the loan program -- can be handled by the U.S. Office of Education.
- The Division of Manpower Development Assistance should again, at the earliest possible date, to diagnose the needs in the area of manpower development. One major objective of this study should help determine the number and location of institutions needed to provide law enforcement education programs. This diagnosis should be done not only in connection with police training needs but also in the field of corrections, courts and other areas.
- The Division of Manpower Development Assistance begin at the earliest possible date, to implement Section 406(e) of the Act, as amended, to assist institutions of higher education to develop improved methods of law enforcement education - mainly curriculum development,

but also teacher development and development of educational materials and textbooks. Also, consideration should be given to the appointment of a committee of key educators in the law enforcement field to study this matter and make recommendations.

- The Division of Manpower Development Assistance should assume the responsibility of developing and supporting regional and national training programs, workshops, and seminars to instruct state and local law enforcement personnel in improved methods of crime prevention and reduction and enforcement of the criminal law pursuant to Section 407 of the Act, as amended. In this connection encouragement and assistance should be given to those states that have not yet done so to establish Police Officer Standards and Training Commissions (now established in about 35 states) and to set mandatory basic police training standards (now mandatory in about 25 states).
- Manpower Development Assistance assumes all purely manpower development and training functions presently being carried on by the program divisions of the present Office of Law Enforcement Programs for carrying out its training function. MDA should maintain a close liaison with the Technical Division of OCJA for advice and guidance with regard to the various substantive areas in the field of law enforcement.

Concern has been expressed over the extent of abuse of the loan program - that is, the awarding of loans to students who do not intend to enter the law enforcement field but might be using the loan program as a way of financing their higher education. It is hoped that by limiting eligibility for LEEP funds to institutions with approved associate, baccalaureate and graduate degree programs in criminal justice, starting with the 1972-73 academic year, and by closer scrutiny and monitoring by the regional offices, and a markedly strengthening audit function throughout LEAA, this abuse will be greatly curtailed.

- The billing and collection procedures be assumed by the newly proposed Office of Operations Support.

Regional Offices: The Task Force recommends that the responsibility and authority vested in the Regional Offices be substantially increased and that the staff capability in the regions be similarly expanded and structured in order that those offices may function fully as LEAA offices.

The Task Force finds support for decentralization in Presidential policy, in the law governing LEAA, and in pragmatic and program terms.

We also draw attention to the recent study of the OLEP Regional Offices conducted by the Management Planning and Review Division and to the OLEP memorandum of April 21 regarding "Regional Office Staffing Patterns." Both the study and the memorandum support the major thrust of our own conclusions and recommendations.

Most certainly the Presidential Directives in 1969 establishing common regional boundaries and regional office locations, the recommendations of the Federal Assistance Review Committee (FAR), and the proposed Law Enforcement Revenue Sharing Act of 1971 all carry the message of placing responsibility with state and local units of government and with delegating operational decision-making powers to those several field officials who are in direct contact with state and community problems.

The Omnibus Crime Control and Safe Streets Act of 1968 specifically recognizes that "crime is essentially a local problem that must be dealt with by state and local governments if it is to control effectively." The funding package for that Act, especially the block grant concept, clearly places major responsibility on the states and logic then defines the central federal role largely in terms of support and assistance rather than control.

Finally, state and local problems and the state and local capacity and willingness to deal with those problems vary significantly. To be effective, the LEAA program must be able to respond to those variations, to draw upon the strengths and to shore up the weaknesses. Flexibility of response depends greatly on an intimate knowledge of the local and state scene and this kind of understanding cannot be developed in Washington, D.C. It can and must be developed in the field.

In its review of the central and regional office operations, the Task Force has found considerable evidence of multiple and duplicate reviews of plans and grants and imposition of detailed requirements, particularly on discretionary grants, which create immense seasonal workload burdens on both central and regional offices. This has left little time for the very essential tasks of long range planning, establishing goals and priorities, providing service, support and information. The flow has been to Washington and not from Washington and the Task Force believes this to be directly contrary to the interests of this Administration, this legislation, and this program.

The following recommendations deal with the range of responsibility and authority that the Task Force believes should be vested in the Regional Offices and the type and numbers of staff necessary to carry out those responsibilities. Attached also is a "model" organization chart for a regional office which the Task Force recognizes can be modified and tailored to fit unique regional needs and available manpower.

The Task Force recommends:

1. That the Regional Offices be delegated final review authority for
 - a. Planning grants
 - b. Action grants
 - c. Discretionary grants as allocated
 - d. Part E grants

This recommendation would place review and approval authority at the level where the knowledge of the needs and problems of individual states is most complete. It would increase the opportunity for regional offices to influence plan and program development by adding muscle to their powers of persuasion. It will substantially reduce duplication of effort by LEAA staff and contribute to reduction in the time lag in fund delivery.

General policy guidance will come from the central staff to insure proper coordination of regional efforts. The central office will also concern itself with new programs, appeals, regional office performance evaluation, priorities and program objectives, providing the states with fund estimates on which to plan and evaluation of total program impact.

The regional offices will handle all project development, processing, monitoring, review for statutory compliance and final plan and grant approval.

2. That there should be an active technical assistance capacity in offices.

Part of the original rationale for the establishment of regional offices was to permit technical assistance needs to be administered on an ongoing basis in close coordination with state and local officials. It was recognized that LEAA would retain a small cadre of leading experts in various substantive areas working from Washington primarily in the areas of (a) defining technical assistance goals and reform standards, (b) developing manuals, models and program designs, (c) developing training and workshop programs, and (d) developing consultation programs including the selection and identification of qualified consultants to provide technical assistance in given areas. The Regional Offices were to be the direct contacts to state and local governments on such matters, providing ongoing counsel and information dissemination, executing technical assistance agreements, and providing individualized technical assistance in response to specific requests from state and local units of government.

The Task Force believes this original concept was sound and argues for its implementation as rapidly as possible. It finds that the accrual of control on plan and grant approval in the central program divisions has so far prohibited both the central office and regional offices from functioning as intended in the technical assistance area. The provision of such assistance directly in the pre-application stage, for example, should contribute greatly to the improvement of plan design and application. To provide such assistance demands a technical assistance capacity on-site and with a clearly defined mission.

3. That the administrative authority of the Regional Office be broadened to include full responsibility for:

- (a) All general housekeeping functions
- (b) Procurement from GSA sources
- (c) Administration of an imprest fund
- (d) Initiation of personnel actions
- (e) Preparation of regional budget material
- (f) Control of regional funds

A suggested organizational pattern for a regional office is appended to this report. The responsibilities of the several divisions would be as follows:

Office of the Regional Director

- a. Represent the Administration within his region with particular emphasis on relationships with the executive and legislative leadership on the several states in the region.
- b. Plan, organize, direct and control all regional activities.

Administrative Division

- a. Provide all administrative and clerical support to the regional office.
- b. Provide all LEAA regional office internal fiscal services.

Operations Division

State Representatives:

- a. Serve as direct contact for assigned states on all LEAA programs.
- b. Review, analyze and make recommendations to the Regional Director on state plans and all planning, action, discretionary and Part E grant requests as well as LEEP fund allocations.
- c. Monitor SPA and LEEP activities.

Grants Managers:

- a. Provide assistance to state and local government in the fiscal area.
- b. Evaluate state and local fiscal operations.
- c. Review and evaluate fiscal operations of discretionary grant recipients.
- d. Monitor discretionary grant recipients.

Technical Assistance Division

- a. Provide technical assistance to requesting organizations within the region.
- b. Recommend referral to the central office of technical assistance problems beyond the capability of the Regional Offices.
- c. Assist in the evaluation and monitoring of planning, action, discretionary and LEEP grant requests.

V. THE NATIONAL INSTITUTE OF LAW ENFORCEMENT AND CRIMINAL JUSTICE

Throughout its deliberations the Task Force has not seriously considered a withdrawal from the research effort. In raising the question, opinion was unanimous on the overriding importance of -- and need for -- a nationally controlled research effort. The Task Force believes that this research effort could eventually prove to be LEAA's most noteworthy contribution to the criminal justice system.

Almost all of the Institute's manpower is dedicated to the review of private research proposals which are generated in response to the widespread distribution of the Institute's plan. No effort has been made to develop a catalog of private capabilities with a view toward taking a more aggressive grantsmanship stance. The Institute is, in effect, being wasted on an effort which has been demonstrably non-productive.

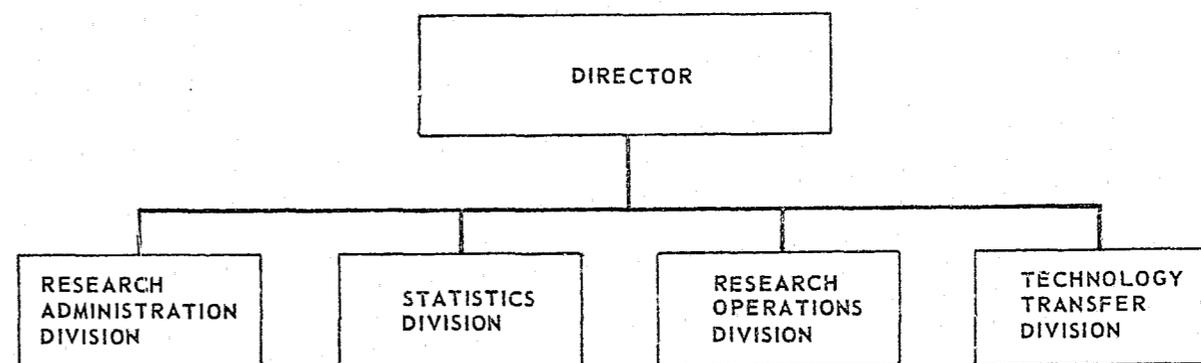
Improvements in the Institute can be brought about by:

1. Reorganizing to break down present barriers to coordination and lines of resource allocation and to foster innovation and wise resource management.
2. Substantially increasing the in-house research effort.

We can begin to look for an organizational framework by reviewing the law, which makes several specific charges to the Institute which can be summarized and paraphrased as follows:

1. Encourage and fund research.
2. Conduct in-house research.
3. Instruct through information dissemination, workshops, and fellowships.
4. Recommend action.

This clear and specific functional charge in the law immediately suggests an organizational framework such as the following:



which, with the addition of staff for the Director to assist him in setting objectives, reviewing work plans, and formulating recommendations for action, could carry out the Institute's statutory mission.

A question may arise regarding the separation of research grants management from in-house research operations, on the theory that strong coordination of approach is required to avoid duplication of effort and to maintain a strong attack on the problem.

The Task Force's response to that question is three-fold:

1. Management and coordination are the prime functions of any director.
2. The grants process is not now well handled. If the Institute takes a grip on the approach to private research, rather than letting itself be gripped, the time consumed in review of proposals should decrease.
3. In-house research, to be fully effective, should be relieved of operational and managerial problems which tend to assume priority and stifle in-house research activity.

Research Administration. This Division would provide most of the services now performed by the present Operations Support Unit and would be strengthened by the addition of a small cadre of substantive program experts so that the two functions of grants program review and grants management could be performed. The Division would basically respond to research decisions made by the director, his staff and Center heads. Daily communication with Research Operations Division will be essential, but the researchers in the latter should not become involved in the administrative functions of the former. There is a probable further sub-organizational breakdown which we prefer to leave to discussion with the head of the organization.

One of the first major new tasks of this Division would be to develop a comprehensive catalog of private research capabilities and a system for updating it regularly, to give the Institute the ability to be selective and aggressive in the improvement of the nation-wide research effort. Some of the data required for each outside research unit would be:

1. A history of its production.
2. An evaluation of its performance.
3. A resume of its resources.
4. A summary of its work in hand.

The effort involved in developing this would be substantial but the need is inescapable.

Statistics Division. The Task Force's only choice in terms of its objective of consolidating similar functions is to locate statistical research and criminal justice statistical methodology development in the Institute and to assign to OCJA the function of assisting states in developing and using their own statistical systems.

The latter (OCJA) function should occupy the lower priority until further work has been done in statistical research at the national level, and until more time has been given to the development of state and local information systems capabilities in general.

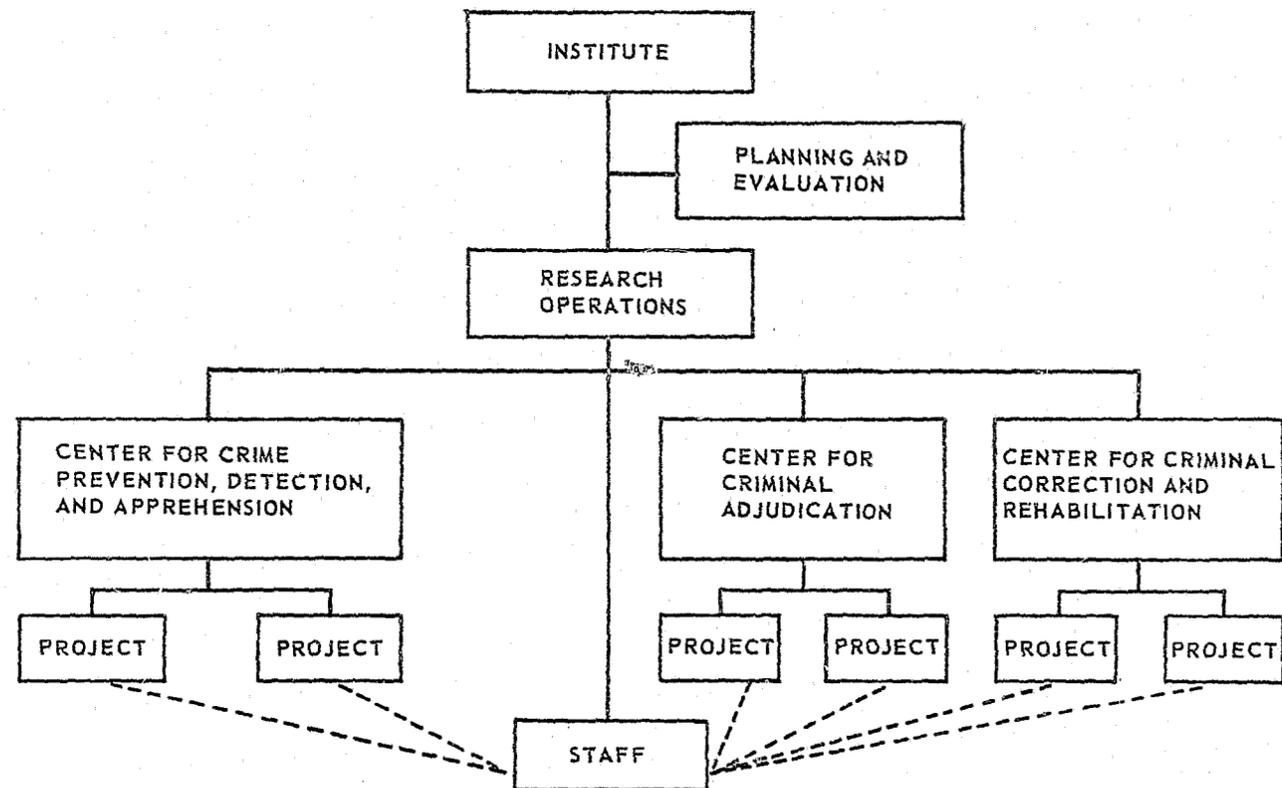
The Statistics Division could be an important resource for the Office of the Administration in developing information for program measurement and performance evaluation techniques. It will also serve as a resource for the in-house research function. Its primary task, however, will be to expand the central library of statistical information of criminal justice and to refine techniques for producing such information. It should maintain ties with the Program Support Division of the Office of Operations Support in terms of work that can reasonably be done now with states in developing their statistical capabilities.

Research Operations. This Division would comprise the in-house research group, which should consume the largest share of the Institute's manpowers. A review of the Institute's description of its 51 "professional personnel", which groups them into 12 categories (perhaps artificially -- they could be described in 18-20 categories or summarized in 6 disciplines) and of the work plans of the present centers and program desks indicates the managerial

difficulty of dividing these people into centers and still mounting an effective in-house research effort. This makes it tempting to suggest a total abandonment of the centers and an organization purely on project lines. We assume that most in-house research projects will require interdisciplinary approach which can best be achieved by a loose organization aimed at project needs and administrative (personnel) affairs. Yet there are overriding reasons to maintain a center structure:

1. The concept and titles of national centers have in themselves an immeasurable prestige value.
2. Communication between the Institute and other LEAA program operations should be facilitated through organizational identification of similar approaches to elements of the criminal justice system.
3. The organizational superstructure for the Institute proposed above does not tend to define the important function of coordinating similar research efforts. This should be accommodated.

The Task Force therefore suggests that the center concept be maintained but consolidated along the lines of the three general elements of the criminal justice system. However, our dislike for the allocation of existing scientific personnel to management by centers is abiding, and the need for an organization which stresses the project is an important one. To meet these problems, we suggest that the Centers have no permanent staff other than a Director, and that all professional staff resources be headed by a Chief of Staff who is also the head of the Research Operations Division, to be allocated to project assignments as the needs of the Institute and the interests of its scientists dictate. The Chief of Staff will be responsible for administrative matters, personnel evaluations (in connection with the Center head and project manager), and will not have a major program role. He should probably have an operations research background. Center heads must have major program credentials and will be a resource in research decisions in their areas, performing in an overall project supervisory capacity and coordinating projects assigned to their centers in terms of Institute objectives and directions. The chart that follows displays this concept:



The Task Force is not prepared to recommend staff size or types of personnel. So little thinking has been done in the Institute about in-house research that we have no firm concept of the number or types of projects which could or should be handled in-house. Maintaining flexibility in order to respond quickly to research opportunities of the moment should be a prime criterion; both because an in-house group is ideally located for this and because of the significant number of scientific personnel with qualifications to act as project managers. This, however, implies major fluctuations in workload and the need for an ability to act quickly in gathering manpower on short-term assignments. The most obvious way to handle this would be to enter into an agreement with a contractor -- possibly an institution of higher education -- to provide these services on a callable time-materials-profit basis. If no such contractor exists, one could be created.

Technology Transfer. The function of this Division would be otherwise similar to the present Center for Demonstration and Professional Services. It should have a greater voice in the overall research plan and project choices and should mount an increased instructional efforts in terms of the workshops specified in the law. Its ties with the Manpower Development Assistance Division should be developed, and it might be given definite responsibilities for liaison with OCJA.

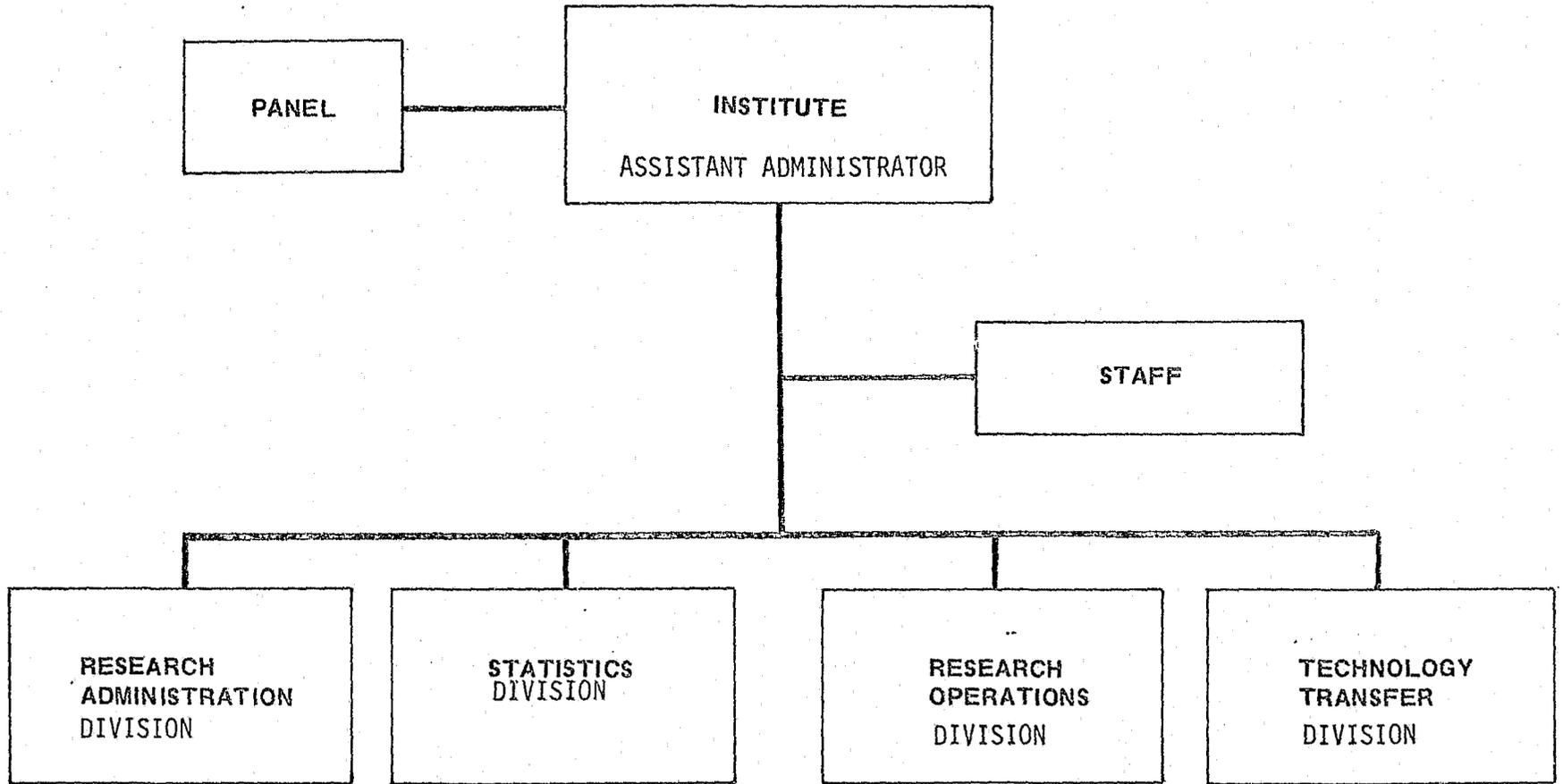
The Task Force agrees that the Library is a general LEAA support function and should be located in the Division of Administrative Management. It must maintain ties with the Institute but would be in a more favorable position if decisions on its level of resources and operations were made elsewhere.

Research Plan Panel. It may be wise to create a panel composed of the Institute Director, Center Chiefs, Division Directors, one or more OCJA representatives, and possibly a staff representative of the Administrator to review and make decisions on the research projects. This is suggested with the following comments:

- The Institute Director should be primarily a manager. It could be unwise to vest major program decisions totally in him; hence, the panel provides a forum for program expertise.
- The Task Force generally shies away from management by committee, which does not foster a "single point responsibility" concept. The suggested panel provides one formal link with OCJA.

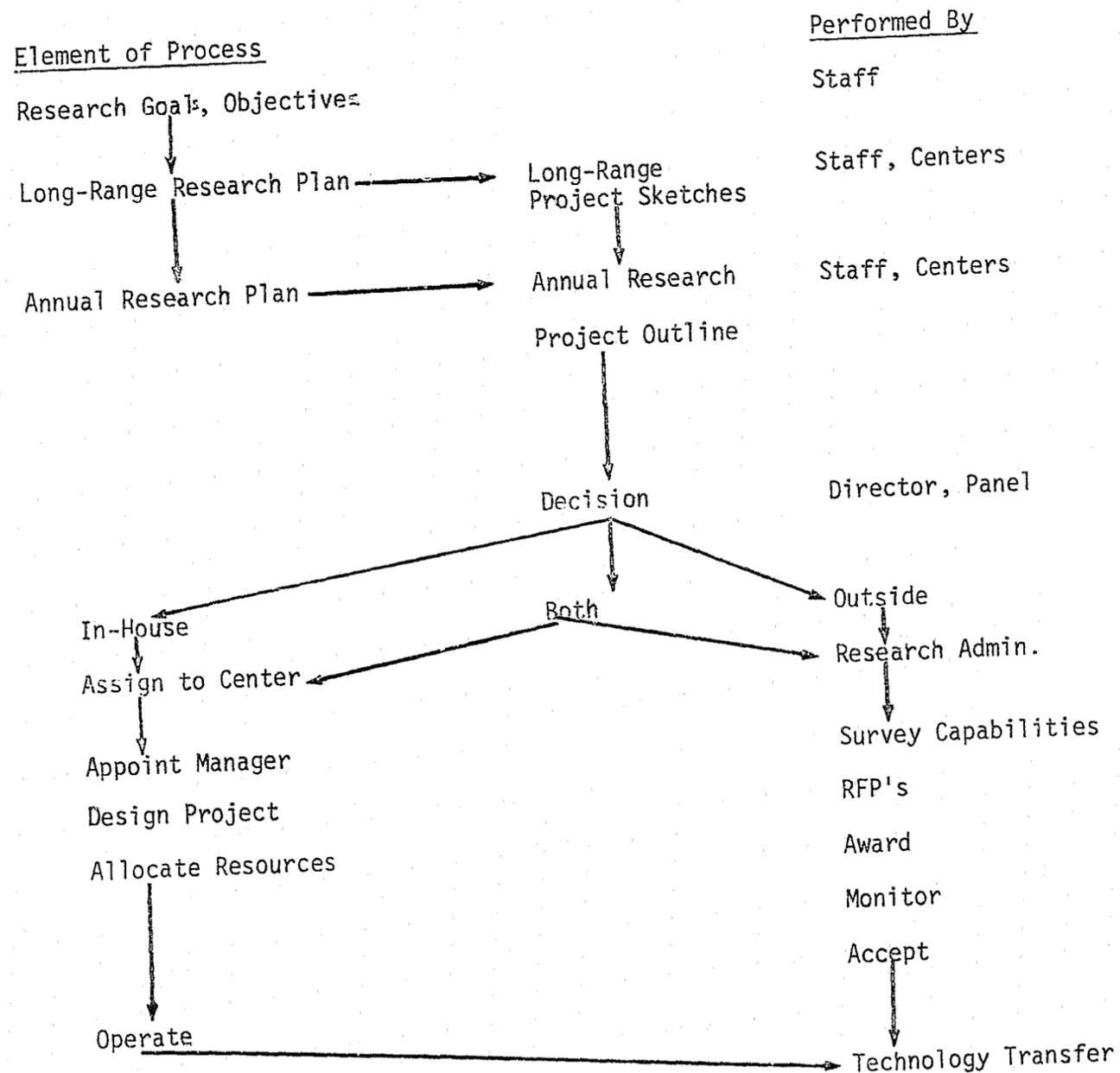
The suggested panel is not a substitute for internal communication.

An overall organizational chart and a design for arriving at project, contract and grant decisions in the Institute are included in this report. Both of these should be amplified. The functional responsibilities outlined in the various sections above can be clarified by the Task Force in connection with operational personnel.



NATIONAL INSTITUTE

RESEARCH PROJECT DECISIONS AND PROCESS



VI. OFFICE OF OPERATIONS SUPPORT

In meeting its objectives of greater delegation of authority and decentralization of law enforcement assistance program efforts, the Task Force has been required to re-think the present operations support activities in OLEP. This was necessary to maintain the important function of program support assistance in OCJA while removing from it those operations which will either be taken over by regional offices or are of a non-policy nature. The basic intent of the Task Force has been to retain in the Financial Management Development Division of OCJA functions dealing with central policy on grants management approach, development of review guidelines and related documents which must be prepared by the central program office for uniform national consistency, and other allied activities.

The Office of Operations Support should accept those tasks of a non-policy nature having to do with routine processing and administrative matters. The Task Force recognizes that simply suggesting the removal of these to the present Administrative Management Office could, in terms of its existing structure, create confusion. We have therefore recommended a superseding structure of an Office of Operations Support. While it is not an entirely accurate definition, the division oriented toward internal operations could be viewed as the present Office of Administrative Management; and the one having to do with external operations as a new group created to accept functions now performed in OLEP, the Institute and OAA.

Division of Administrative Management. This organization should be devoted solely to the smooth and economical functioning of LEAA personnel and offices and their procedural and internal administrative affairs. It must accept a greater delegation of authority to regional offices and should substitute guidance, control, service and support for the direct operational characteristics formerly prevalent.

Personnel Branch. We are guided by Department of Justice policy that an agency of the size to which LEAA is shortly expected to grow should have its own personnel management capability. We are satisfied with the recently concluded agreement which contemplates centralization, temporary assignment of Departmental personnel to LEAA to manage the reorganization effort, followed by the withdrawal of the Department and the vesting of full authority in LEAA.

General Services Branch. The main functions of this Branch are intended to be:

1. Procurement (purchasing).
2. Property management.

3. Space management.
4. Communications management (telephones, etc.)
5. Mail and correspondence management.
6. Records management.
7. Forms design and control.

These functions require no elaboration, except that to whatever other LEAA operations have assumed authority in this area it should be returned to the Administrative Management Division. We have already commented on the need to delegate authority in these areas to regional offices.

The Director may wish to break this section down further. The Task Force has no objections to this.

Publications Management Branch. Activities concerning the acquisition, classification, storage, use and dissemination of printed materials and the editing, production, control and dissemination of materials for publication are now scattered throughout the agency: in the Institute, OLEP, Office of the Administration, and Administrative Management. The Task Force strongly recommends withdrawal and consolidation of these for management purposes.

This recommendation, like many others, will generate some "who does what" concerns. Rather than deal with these in detail, the Task Force prefers to say merely that operating programs must create the plans and make decisions for generation, acquisition, storage and dissemination of printed materials. This Branch must carry out these plans and decisions and serve as a cost control point. This is not to deny the importance and resourcefulness of a librarian, who will contribute to the overall development of information functions of the agency, but merely another attempt to consolidate a number of similar functions.

This branch will include:

- Library
- Reading Room
- Reference Service

- Editing
- Technical Writing
- Production
- Distribution
- Graphic Arts

A sub-organizational breakdown is obviously in order. We prefer to leave it to the discretion of the head of the Branch.

Budget and Accounting Branch. This Branch remains essentially unchanged and will be responsible for budget preparation and control and all fund accounting and financial reports. It must maintain a close working relationship with the more generalized Program Fund Review Branch of the Office of Operations Support.

Division of Systems Analysis. In presenting its recommendations for OCJA, the Task Force recommended the creation of systems technical assistance capability in the program division and in regional offices to assist the states and subgrantees in establishing and refining criminal justice information systems. The work which the present Systems Analysis Center is now conducting should be carried on in the Operations Support Office under a newly created Systems Analysis Division. The Task Force's intention is that this should be a service unit for LEAA, and that the development of policy and programs for criminal justice information systems should be in OCJA and implemented through its technical assistance capability.

1. The operational service unit must serve all organizational components and should not, therefore, be located in the program (OCJA) office.
2. The technical assistance function must be directed and controlled by OCJA as are all similar efforts.

Given these two considerations, the split is unavoidable. Regular communication between the two must be the order of the day. This is true of all elements of the agency.

The Task Force is constrained to point to the obvious in summary: systems people in these two locations are similar; the functions are different.

Division of Program Support. This Division should be responsible for a part of program fund review functions presently performed by the Control Support Unit of OLEP. It will also perform a contract and procurement support function similar to that performed by the present

Division in the Office of Administrative Management.

Program Fund Review Branch. The Program Fund Review Branch of the Program Support Division in the Office of Operations Support would perform some of the functions presently performed by the Financial Operations and Operational Support units of OLEP.

(continued on next page.)

Specifically, this branch's responsibilities would include:

- Monitoring, on a nationwide basis, the flow of LEAA funds, working closely with the Financial Management Development Division of OCJA and with the regional offices to develop policies and procedures which insure the most expeditious flow of LEAA funds;
- Determining compliance with LEAA financial policy and procedures maintaining close liaison with the Financial Management Development Division of OCJA and with the regional offices in developing procedures and controls for financial management functions;
- Serving, until the Grants Management Information System is operational, as the focal point for the collection, evaluation, and dissemination of financial and/or program accomplishments of SPA's and other grantees, and administering operational management information systems.
- Assuming responsibility for the LEEP billing and collection function, working with the Systems Analysis Division and the Budget and Accounting Branch of the Administrative Management Division in discharging this responsibility.
- All Post-grant processing for OCJA and other LEAA offices;
- Supporting OCJA in FAR Committee activities and other intergovernmental efforts at grant consolidation and simplification.

Contracts and Procurement Branch. The Contracts and Procurement Branch of the Program Support Division in the Office of Operations Support would perform the same functions for central office as the the present division in the Office of Administrative Management. These functions would include:

- Process and procure supplies and services under \$2,500.
- Initiate and process formal agreements for transfer of funds to and from other Government agencies and LEAA.
- Process formal agreements between contractors and LEAA for supplies and services over \$2,500.

- Prepare the necessary documents for soliciting companies to perform under contract for LEAA.
- Negotiate and monitor contracts; review progress and status reports and take necessary action as required; issue amendments to contracts.
- Schedule contract meetings and negotiate closeouts.

Develop LEAA procurements and contract policies. The CPB would also provide these services for regional offices when high-low value contracts and procurements are undertaken. Normal day-to-day low-value contracts and procurements, however, will be undertaken independently by the various regional offices.

VII. CHARTS

The following charts explain the proposed structure of LEAA.

Chart No. 1 indicates the overall structure, with the Office of Administration, its five staff offices, and three line offices.

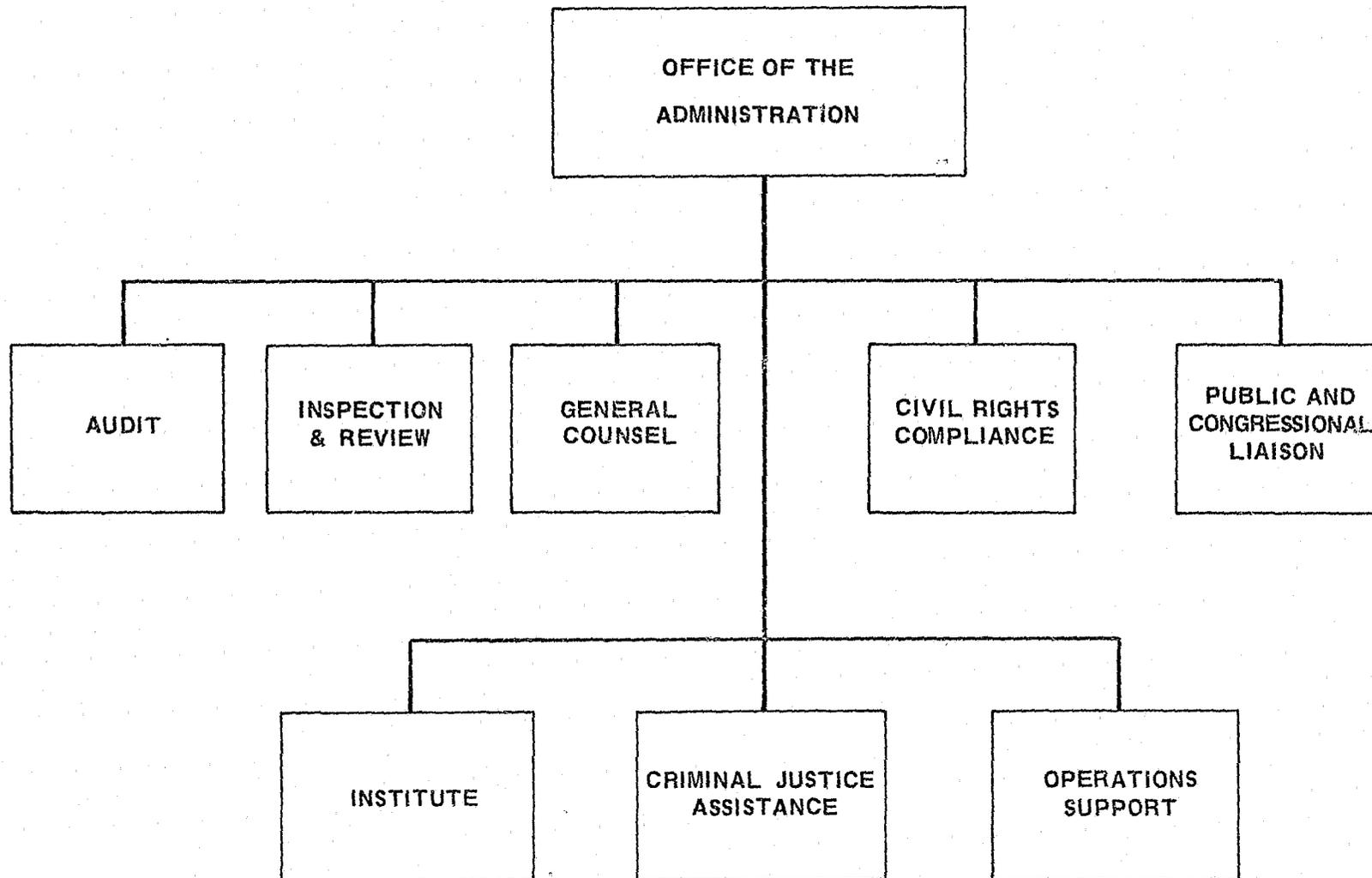
Chart No. 2 indicates the structure of the Office of Criminal Justice Assistance, the principal line office of the agency. It includes the 10 regional offices as well as four divisions. The notations under the Technical Assistance Division and the Manpower Development Assistance Division indicates functions for which that division is responsible.

Chart No. 3 indicates the structure of the regional offices, with responsibility falling under two main categories, technical assistance and operations. Some of the functions of each are listed on the chart.

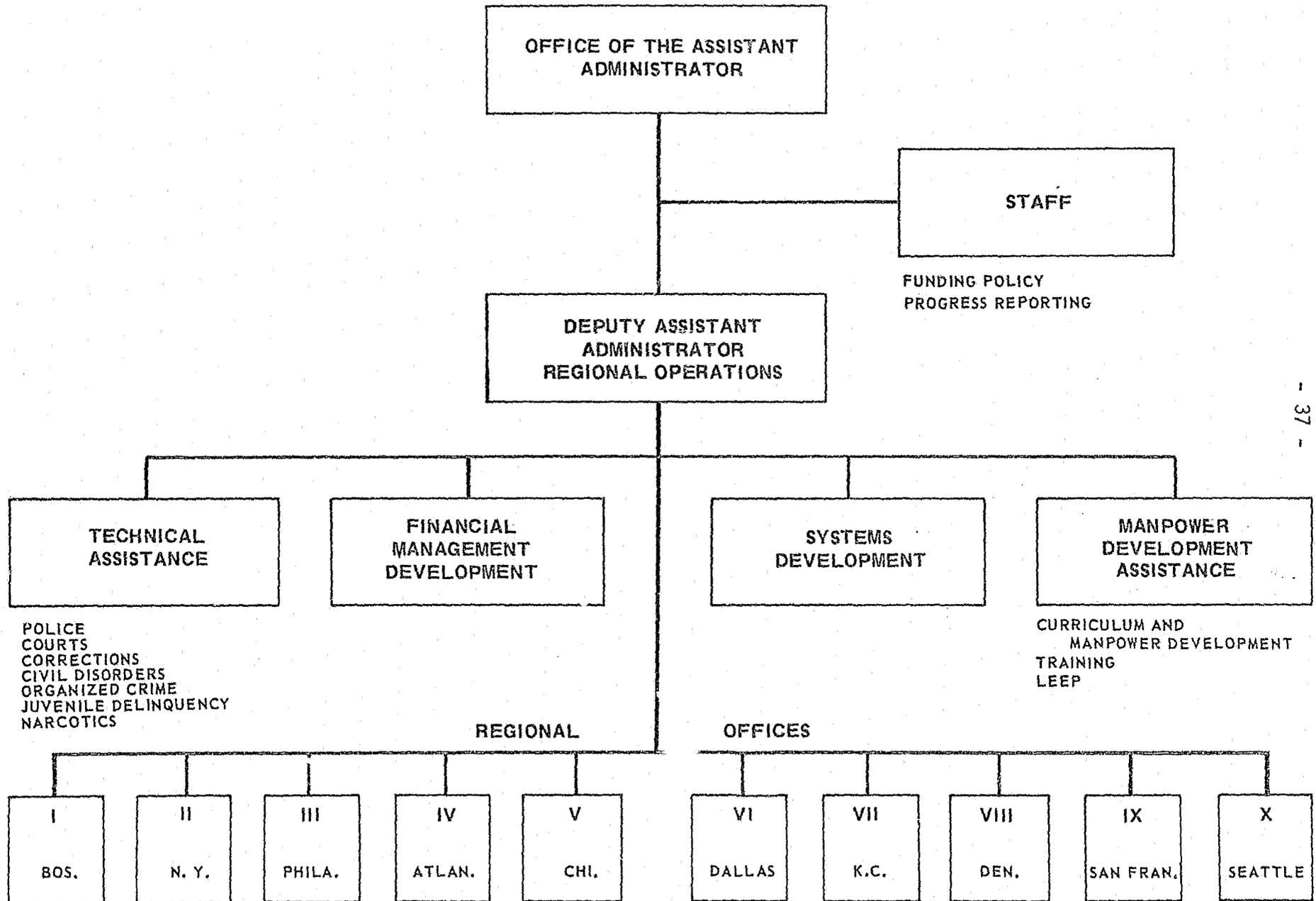
Chart No. 4 indicates the structure of the Institute, another line office, including its four divisions and three centers.

Chart No. 5 indicates the structure of the Office of Operations Support, the third line office, including its three divisions and their six branches.

1. OVERALL STRUCTURE

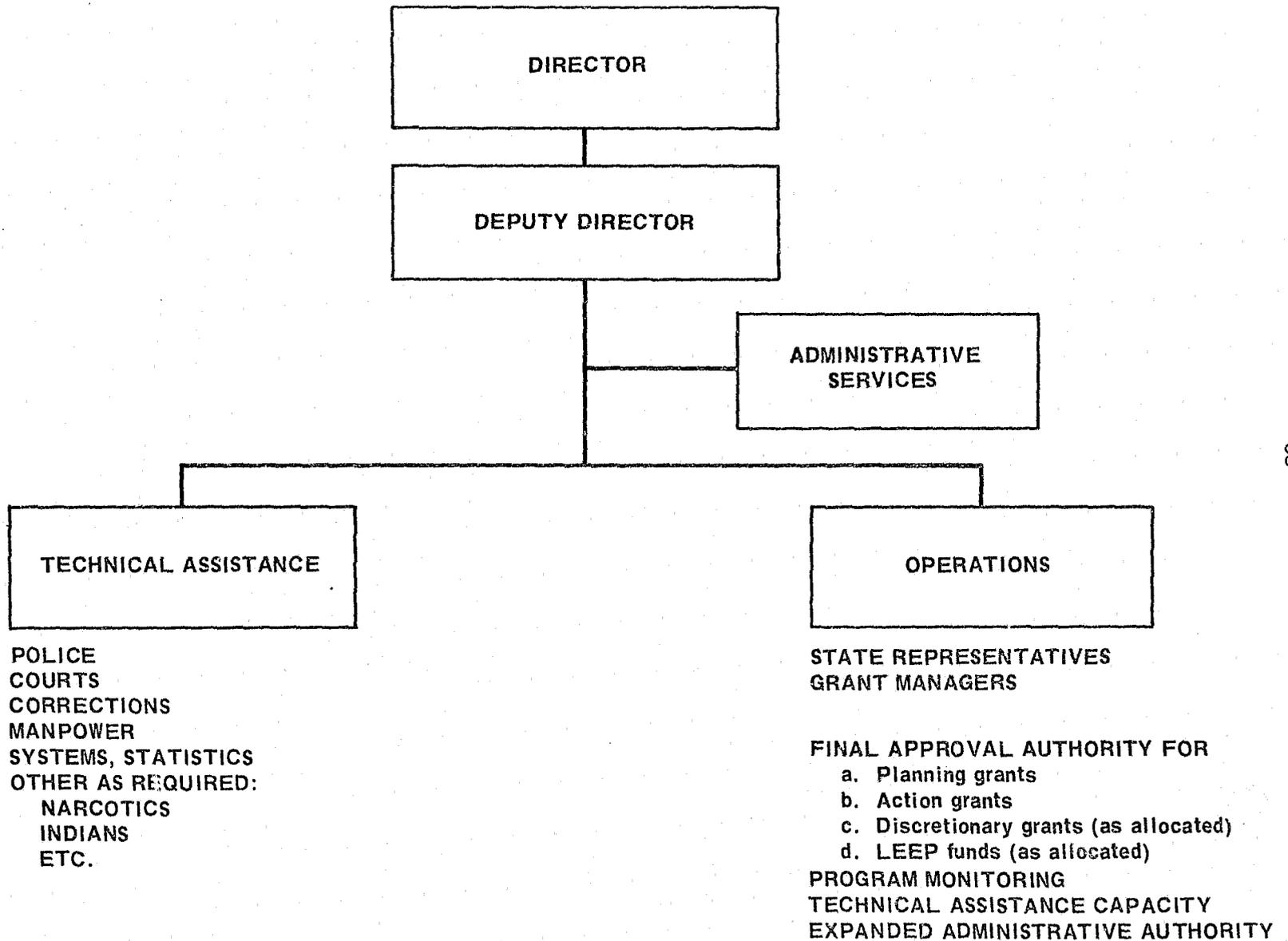


2. OFFICE OF CRIMINAL JUSTICE ASSISTANCE

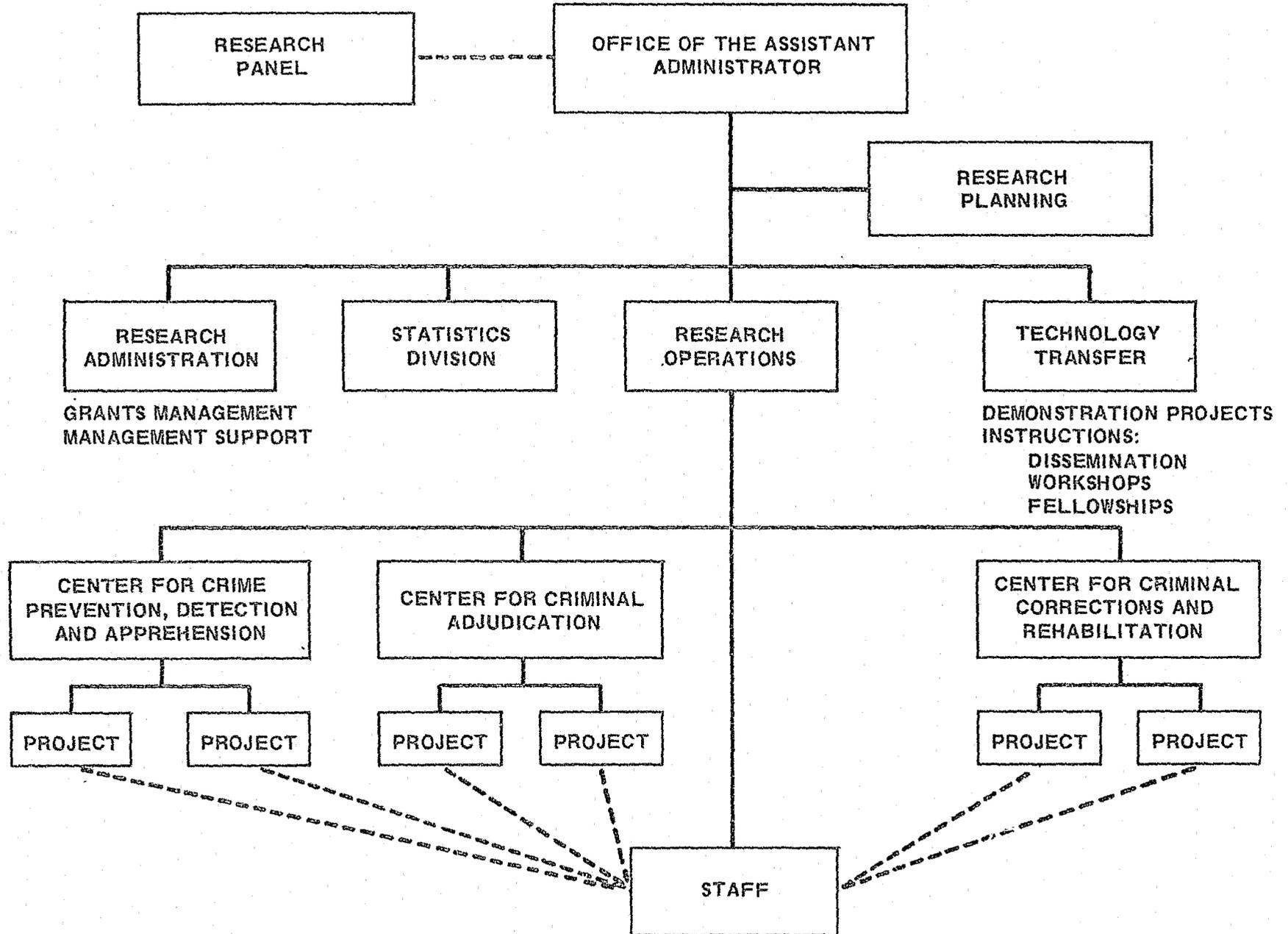


3. REGIONAL OFFICE

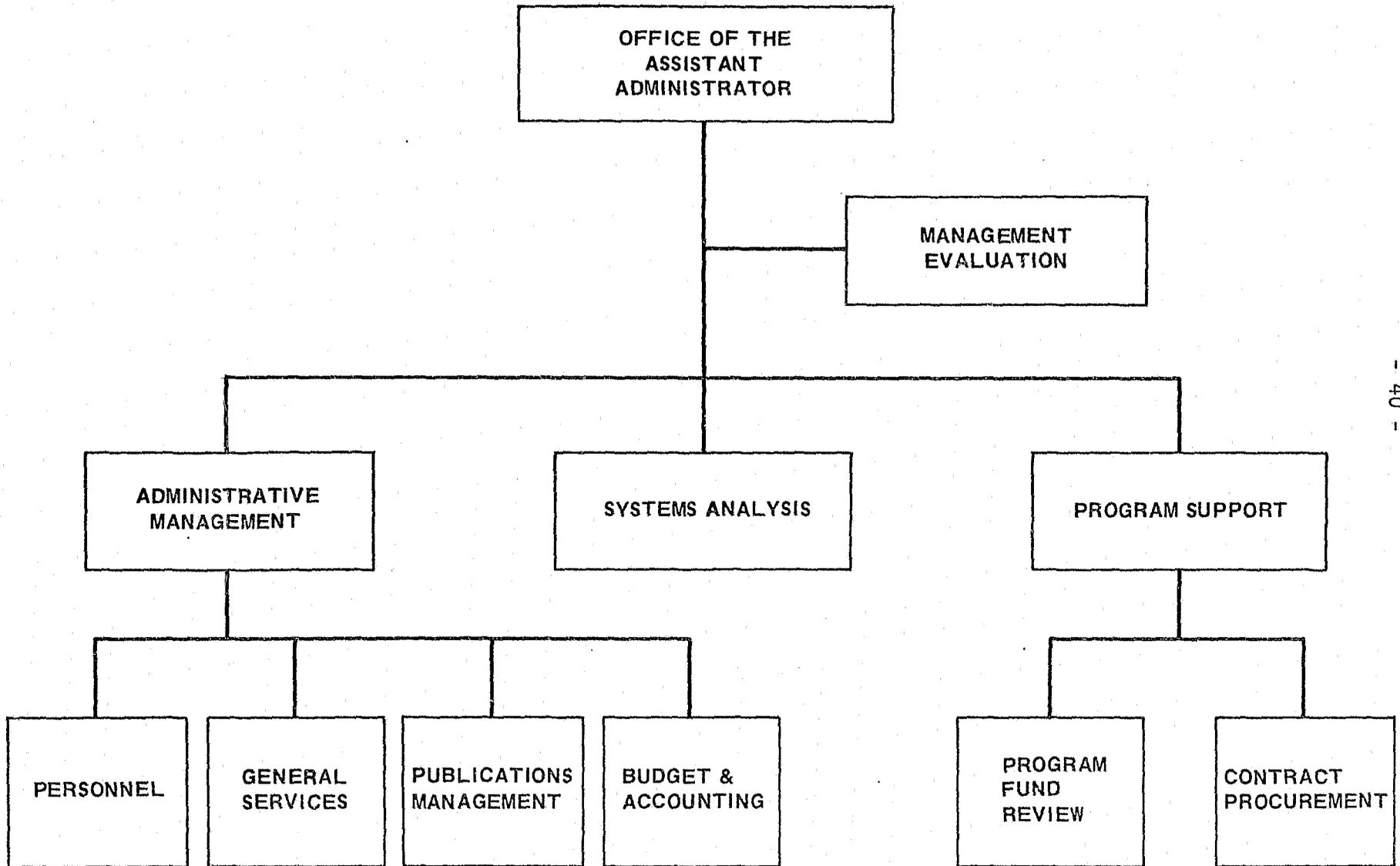
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4. INSTITUTE



5. OPERATIONS SUPPORT



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