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THE CASE OF CHILD ABUSE. PUBLIC PROGRAM MANAGEMENT

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Washington, D. C.

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16. Abstracts

This study makes an effort to assess the effectiveness of HEW's intradepartmental committee on child abuse and to generalize from that particular case. In the course of studying the committee's progress, the need for a coherent methodological framework with which to evaluate public program development became apparent. Accordingly, Chapter I of this paper is devoted to a discussion of the general issues involved. In Chapter II the case of child abuse is discussed in some detail, and in Chapter III the conclusions and recommendations which this study produced are presented.

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PUBLIC PROGRAM MANAGEMENT:

THE CASE OF CHILD ABUSE

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PUBLIC PROGRAM MANAGEMENT

— THE CASE OF CHILD ABUSE —

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1 (a)

HIGHLIGHTS

⊙ Although division of labor in complex organiza-
tions is generally according to function, at
times such entities face problems requiring the
resources or arousing the interest of more than
one organizational component. There are essentially
three possible strategies for dealing with such
situations. One is to assign full responsibility
to an existing organizational unit, which could be
given power to assemble the resources of other
divisions without regard to the existing structure
of authority. Alternatively, a committee struc-
ture could be established within which all the sub-
units involved would communicate and collectively
formulate a program for dealing with the problem.
The third option is to reorganize so as to bring
the overall division of labor into harmony with the
new problem.

* The main advantage of the strong central
authority model is that the decision-
making process is unlikely to be obstructed
by conflicts between organizational com-
ponents whose interests differ. Responsi-
bility is clearly defined and duplication
of effort minimal. However, those units
subordinated to the lead unit may not be
as cooperative as they would be if they
exerted more control over the program.

⊙ A major advantage of the committee model is
the egalitarian distribution of roles and
functions. The decision is likely to be
a careful one with input from a variety of
perspectives. On the other hand, the
program planning process will be relatively
cumbersome.

* The reorganization model entails high start-
up costs, and fails to utilize existing
organizational resources. On the other
hand, it avoids all the problems of co-
ordinating sub-units with varying interests,
and is totally unhampered by structures
of authority which were designed for other
problems.

1 (4)

- In dealing with an actual problem that cuts across the existing division of labor, a strategy choice must be predicated on the multitude of variables associated with the particular situation. These include such issues as the urgency of the problem, the state of knowledge in the program area, the resources available for addressing the problem, and legal constraints. All of these should be considered in the context of the general suitability of each model.

- HEW has frequently made use of intradepartmental committees when confronting problem areas in which more than one agency has responsibility. The Department's success in such ventures has varied. One of the first opportunities to form an intradepartmental committee under the new "Operational Planning System" (OPS) presented itself in 1973 when the Department decided to formulate a program to address the problem of child abuse. Significantly, child abuse later was selected as an FY 1974 objective to be monitored by the Secretary.

- HEW's decision to establish this child abuse program was stimulated by a legislative initiative focusing on child abuse problems. Although the Department opposed that initiative, its spokesmen were unable to demonstrate to concerned Congressional committee members that HEW was already responding to the problem adequately. Indeed, it was not until the Congress had already begun to formulate legislation that HEW took action.

- Once the decision to establish such a program had been made, there was no effort to formulate an overall departmental strategy for child abuse. Rather, each HEW agency identified its child abuse activities. These activities were then aggregated, all duplication eliminated, and the resulting compilation was termed an "intradepartmental effort." This piecemeal approach was a major weakness in the HEW child abuse program development process.

- In the case of child abuse, a significant element of political urgency was coupled with a relatively small amount of knowledge and technology available in the program area. From a political standpoint, the main objective appears to have been the mobilization of some highly visible action. The decision to

use an intradepartmental committee was therefore
well founded. No relationships between agencies
were strained by shifts in authority, nor were
there start-up costs to contend with. Each agency
was given the opportunity of deciding what effort
it should make, within reasonable limits, and at
the same time the "department" objective was
assembled expeditiously.

● In the vast majority of cases in which a problem
cuts across agency lines, the intradepartmental
committee is likely to be the chosen strategy.
It is consequently of importance to make the
strategy operate as efficiently as possible.
Toward this end, it is recommended that greater
emphasis be placed on accountability, and that
steps be taken to assure adequate access to the
knowledge and viewpoints of outside experts and
constituencies.

● Some form of rigorous evaluation of the policy
making process should be institutionalized to
ensure that any given intradepartmental committee
is making adequate progress. Each CRS objective
should be linked with some procedure for assess-
ing its actual effectiveness, and the objectives
themselves should be evaluated by some well-
informed outside party.

● A formal mechanism of communication between the
experts and the policy makers should be institu-
tionalized, perhaps modeled after the structure
of Congressional hearings.

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INTRODUCTORY NOTE

In this paper an effort is made to assess the effectiveness
of HEW's intradepartmental committee on child abuse and to
generalize from that particular case. In the course of
studying the committee's progress, the need for a coherent
methodological framework with which to evaluate public program
development became apparent. Accordingly, Chapter I of this
paper is devoted to a discussion of the general issues
involved. In Chapter II the case of child abuse is dicussed
in some detail, and in Chapter III the conclusions and
recommendations which this study produced are presented.

CHAPTER I
ALTERNATIVE APPROACHES TO PUBLIC PROGRAM DEVELOPMENT

Problems of Methodology

There is no methodology consensus among researchers in public
administration. In place of a distinct body of theory, there
are a few preliminary efforts to supply a conceptual frame-
work, and these vary widely in their basic assumptions.*

One approach which has gained wide acceptance begins with the
assumption that public administration is essentially similar
to industrial management. This view, perhaps best exemplified
by the work of Herbert A. Simon, emphasizes the concept of
efficiency in decision-making, and aims at a method of
scientific analysis of administrative behavior. In his book
Administrative Behavior,[1] Simon dismisses previous admin-
istrative theory as a superficial set of proverbs, and
proposes a vocabulary for describing the process of decision-
making which, he suggests, might lead to a rigorous science
of administration. He begins by stating a fundamental
principle which defines the task of administrative science
in terms of prescribing "correct" administrative behavior:
"maximization is the aim of administrative activity, and
administrative theory must disclose under what conditions
the maximization takes place."[2]

Recognizing that efficiency is the goal of administration,
but not necessarily the reality, Simon indicates that theory
should concern itself also with the limits on the ability of
the administrator to achieve this goal. However, the vocabulary
he proposes does not describe these limits, restricting itself
to the definition of an analytic framework for what is clearly
an ideal rather than a real process of decision-making. This
is a serious limitation of Simon's framework, but his method
is nevertheless quite useful in evaluating decision-making
situations and in suggesting possible alternatives. In this
paper extensive use will be made of one of the fundamental
concepts Simon introduces, the idea of a strategy.

> At each moment the behaving subject, or
> the organization composed of numbers of
> such individuals, is confronted with a
> large number of alternative behaviors,
> some of which are present in conscious-
> ness and some of which are not. Decision,

---

*These remarks about the theory of public administration are
based on a relatively superficial knowledge of the vast
literature in this field, and are not intended to be com-
prehensive but merely to define the orientation of the
author.

> or choice, as the term is used here, is
> the process by which one of these alterna-
> tives for each moment's behavior is selected
> to be carried out. The series of such
> decisions which determines behavior over
> some stretch of time may be called a
> strategy.
>
> If any one of the possible strategies is
> chosen and followed out, certain con-
> sequences will result. The task of
> rational decision is to select that one
> of the strategies which is followed by
> the preferred set of consequences. It
> should be emphasized that all the con-
> sequences that follow from the chosen
> strategy are relevant to the evaluation
> of its correctness, not simply those con-
> sequences that were anticipated.[3]/

In his discussion of the limits of rationality, Simon reasons
that it is the decision-maker's psychological environment
which determines the extent to which maximization is possible.
Therefore, he suggests an organization should provide its
members with an 'environment that will adapt their decisions
to the organization objectives, and will provide them with
the information needed to make decisions correctly."[4]/ This
leads to amplification of the concept of a strategy from the
level of an isolated decision-maker to that of the individual
who functions as part of a social group - an organization.

> When choice takes place in group situations,
> the consequences of a course of action become
> dependent not only upon the individual's
> selection of a particular alternative, but
> upon the selections of the other members of
> the group as well. Only when the behaviors
> of the others are taken as "constants" --
> that is, when expectations are formed regard-
> ing their behaviors -- does the problem of
> choice take on a determinate form. When
> such expectations have been formed, the
> only remaining independent variable is the
> individual's own choice, and the problem of
> decision reduces to the former case.
>
> Hence, the set of alternatives available
> to the group must be carefully distinguished
> from the set of alternatives available to
> the individual. The latter is only a sub-
> set of the former, a different subset for
> each given set of behaviors of the other
> members of the group. The alternative

that the individual actually selects for
his own behavior may be quite distinct
from the alternative that he would select
if he could determine the behaviors of
all the other group members.[5]/

Thus it is important to understand the structure of authority
relationships within the organization.

Some scholars of administrative theory have been critical of
Simon's behavioristic approach. They argue that, while it
may be sufficient for understanding industrial management
and other areas in which the organization's objectives can
be described in quantitative terms, his methodology is by no
means adequate for analyzing public administration, the aims
of which are much more complex than maximization of financial
profits. Robert A. Dahl, one exponent of this view, suggests
that Simon's idea of a science of public administration is
premature, and that his analysis of the hierarchy of relation-
ships within organizations fails to come to terms with the
important role played by "normative assumptions" and moral
values.

What is efficiency? Belsen and Dachau were
"efficient" by one scale of values. And in
any case, why is efficiency the ultimate
test? According to what and whose scale of
values is efficiency placed on the highest
pedestal? Is not the worship of efficiency
itself a particular expression of a special
value judgment? Does it not stem from a
mode of thinking and special moral hypothesis
of resting on a sharp distinction between
means and ends?

The basic problems of public administration
as a discipline and as a potential science
are much wider than the problems of mere
administration. The necessarily wider
preoccupation of a study of public admin-
istration, as contrasted with private
administration, inevitably enmeshes the
problems of public administration in the
toils of ethical considerations.[6]/

This criticism is especially relevant to the public administra-
tion of social programs, as the norms and values involved there
are more controversial than those which figure in other areas
of public policy. Since the decision-making situation under
scrutiny in this study is one involving social policy, as do
many other HEW programs, Dahl's argument must be taken seriously.
Therefore, the procedure followed in this analysis will be to
proceed from an initial consideration of alternative strategies,
which draws on Simon's method, to a more speculative examina-

tion of the variables and constraints which introduce uncertainties into the situation.

The Changing Division of Labor

Although the division of labor in complex organizations is generally according to function, at times they face problems requiring the resources or arousing the interest of more than one organizational component. There are essentially three possible strategies for dealing with such situations. One is to assign full responsibility to an existing organizational unit, which could be given power to assemble the resources of other divisions without regard to the existing structure of authority. Alternatively, a committee structure could be established within which all the sub-units involved would communicate and collectively formulate a program for dealing with the problem. The third option is to reorganize so as to bring the overall division of labor into harmony with the new problem.

While there are innumerable variations possible within each of these schemes, the three comprise a broad set of alternative strategies from which the administrator must choose. Each option carries with it general advantages and dis-advantages which should be weighed in making the decision, although the choice will depend to a large extent on the nature of the particular problem being dealt with. It is helpful to project those generalizations which can be safely made onto models of each alternative strategy before considering the variables which enter into any actual choice.

Model I: Strong Central Authority

The first strategy establishes a strong central authority within one organizational unit to coordinate the efforts of several units. Primary responsibility for the deci.sr-making processes involved in formulating a program is in this case assumed by the coordinating component. Similarly, review of and comment on the progress of the program is essentially limited to this group.

In order for this model to function adequately, the organization member responsible for coordination must be someone knowledgeable about the general structure of authority within the organization as a whole. This person would, as a result, probably be someone occupying a relatively high-level position in the hierarchy. Depending on the size of the problem, it may be necessary to appoint a new high-level program manager in some cases.

The main advantage of this strategy is that the decision-making progress is unlikely to be hampered by conflicts between organizational components whose interests differ. Responsibility is clearly defined and duplication of effort minimal. However, adopting this model involves certain risks as well. Those participating units that are placed in a subordinate position relative to the lead unit may not be as cooperative as they would be if they exerted more control over the program. In addition, it is likely that limiting the input into program formulation to one organizational entity would result in a loss of perspective which could detract significantly from program effectiveness.

The fact that the program manager would have to be at a fairly high level within the existing organizational hierarchy for this strategy to succeed introduces another element of risk. In any public administration situation, there is an omnipresent potential that political considerations will take precedence over substantive ones. This is particularly likely to occur when the program administrator is largely ignorant of the "technical" aspects of the problem being dealt with. The strong central authority model offers no check on this inherent tendency of the political dimension to dominate. The substantive component of program formulation could easily be delegated to subordinates - and promptly forgotten.

Still another problem which must be confronted if this model is selected is the tendency of each organizational unit to become complete. There is a natural tendency for any organizational entity with only partial program responsibility to develop programs in related areas. For example, a unit with responsibility for service delivery will be inclined to undertake related research projects. This can result in substantial duplication of effort. It is especially likely to occur under the strong central authority model, since many units would lack a full appreciation of the overall program plan. It may be helpful to consider an example of this model in operation: the White House's Special Action Office for Drug Abuse Prevention (SAODAP).

When drug abuse incidence grew to epidemic proportions in the late 60's, Federal laws were enacted and various community treatment programs were funded. Several Federal agencies developed programs to deal with different aspects of drug abuse (legal, educational, health), each looking at the problem from its own viewpoint. Thus, the Federal response to the drug abuse problem was energetic but uncoordinated.

In 1970, SAODAP was created to coordinate Federal efforts in
the prevention area and to take the lead in policy making.
The various programs continued their efforts, but SAODAP
examined their budgets and evaluated their policies,
ultimately establishing specific goals for each agency and
a control system to oversee their efforts. Without destroy-
ing the agencies' autonomy, this centralization of authority
has provided leadership and enforced some division of labor
among them. While, as might be expected, some duplication
of effort persists, responsibility is clearly defined and
the modest goal of coordination has to a large extent been
achieved.

Model II: The Intraorganizational Committee

The second strategy for dealing with problems which cut across
the existing division of labor establishes a cooperative
committee structure within which program responsibility is
shared by all participating organizational units. In contrast
to the strong central authority model, this procedure is
likely to ensure a careful decision with input from a variety
of perspectives, and is therefore more likely than the first
model to result in a program reflecting substantive knowledge.
Of course, this would at the same time make the program plan-
ning process relatively cumbersome, for organization members
with many different perspectives must reach a common level
of understanding before any decision can be made.

A major advantage of the committee model is the egalitarian
distribution of roles and functions. Involving all the
organizational members who will implement the program in
the formulation process is likely to enhance their cooperation
and maximize their internal motivation to accomplish the
program objectives. Also, the task of communicating the
overall scheme of action is much easier if many people are
involved in initially formulating it. On the other hand, if
the emphasis on participation is carried too far, the con-
tinuity of leadership and self-conscious policy making may
be jeopardized.

Unlike the strong central authority model, this one does not
require the participation of high-level personnel to function
properly. A study by Harold Guetzkow[7]/ of interagency com-
mittees in the governmental bureaucracy found no statistically
significant relationship between the rank of individuals
comprising a committee and its effectiveness, contrary to
popular belief. The only formal characteristics which the
study identified as significant were length and frequency
of meeting, the degree of precision of the agenda, and the

availability of secretarial resources for purposes of communica-
tion. Indeed, these would probably be important factors in
all three alternative strategies. But the insignificance
of rank seems unique to the committee model, and is clearly
one of its positive features.

The establishment in 1947 of the National Security Council was
based on a choice of the committee strategy, and is illustra-
tive of both its advantages and its disadvantages - although
the insignificance of rank is not exemplified. Clearly, in
the area of national defense, it is crucial that policy decis-
ions be based on a maximum of substantive information. The
need for a unified structure of command is also paramount,
however. The NSC has relied on voluntary coordination among
the various interests represented on it, and, as might be
expected, a great deal of competition has developed among those
interests for influence over policy. The status of its members
as highly responsible policy operators in diverse areas of
national security has precipitated conflicts.

In addition to these demonstrated weaknesses, the NSC approach
has the potential disadvantage that, in some instances, in
pursuing their own concerns rather than the overall program
objectives, agencies may find it expedient to withhold pertinent
information from the Council. On the other hand, had the com-
mittee been designed instead as an information exchange body
with a purely advisory membership, loyalty conflicts would
have been avoided, but it would lack the authority that comes
with responsibility. Thus, while this strategy choice appeared
to be the optimal one, it has presented serious practical
difficulties.8/

Model III: The Superagency

The third option is a total reorganization of the division of
labor within the organization as a whole so that all functions
related to the new problem are centralized in one new component.
Clearly this strategy involves not only the establishment of a
new and powerful unit, but also a refinement of the role of all
existing units which would otherwise participate in the program.

This model has some obvious disadvantages. It inevitably en-
tails high start-up costs, and does not fully utilize existing
organizational experience or resources. Legislative constraints
and related factors often prevent its use in government. On
the other hand, it avoids all the problems of coordinating sub-
units with varying interests, and is totally unencumbered by
structures of authority which were designed for other problems.
It also serves as a revitalizing force, shaking down the entire

organization. (This may be less desirable if it occurs
frequently, however.)

The superagency model is in many ways the simplest, if not
always the most economical, alternative - although this
of course depends upon the nature of the problem. A new
agency will not escape the usual internal problems which
face any administrative organization, of course.

The recently created Federal Energy Administration (FEA)
is an excellent example of a case in which the creation of
superagency was appropriate. The problems to be addressed
included the need to conserve scarce supplies as well as to
ensure a fair distribution of energy. Another major need
was implementation of a wide-ranging program to evaluate
America's growing dependence on foreign sources of energy,
and to develop strategies to reduce the nation's vulnerability
to future oil cut-offs and price increases.

Given both the public concern and the realization by members
of both the Legislative and Executive Branches that a
massive focused effort was required, the choice of a super-
agency approach was clearly warranted. In this case a strong
control authority was created in the Executive Office of the
President to handle the immediate problems associated with
the recent "energy crisis." This temporary authority, known
as the Federal Energy Office, also planned the transition to
the superagency - the Federal Energy Administration - and in
fact became the top hierarchy of that new, more permanent
entity.

Choosing a Strategy

Any wise strategy choice must proceed from a careful balanc-
ing of all the alternatives. As Simon points out, it is crucial
that no one criterion be permitted to dominate.

> Much administrative analysis proceeds by
> selecting a single criterion, and applying
> it to an administrative situation to reach
> a recommendation; while the fact that
> equally valid, but contradictory, criteria
> exist which could be applied with equal
> reason, but with a different result, is
> conveniently ignored. A valid approach
> to the study of administration requires
> that all the relevant diagnostic criteria
> be identified; that each administrative

situation be analyzed in terms of the
entire set of criteria; and that research
be instituted to determine how weights can
be assigned to the several criteria when
they are, as they usually will be, mutually
incompatible.9/

In handling an actual problem that cuts across the existing
division of labor, a strategy choice must be predicated on
consideration of a multitude of variables associated with the
particular situation. These include such issues as the urgency
of the problem, the state of knowledge in the program area,
the resources available for dealing with the problem, and
legal constraints. All of these should be considered in the
context of the general models.

The urgency of the problem being dealt with is certainly an
important factor. Epidemics, war emergencies, and other
situations that demand immediate action may not allow time
for the slow progress of committee work or for planning a
smooth reorganization. There are other situations where
urgency is not a substantive factor but political con-
siderations make immediate action desirable. It seems clear
that emergency situations initially call for exercise of the
strong central authority model, but the choice is more flexible
in cases of politically determined "urgency." It may be desir-
able to demonstrate to the public that some immediate action is
being initiated, but at the same time it may not be necessary
to actually implement a service program.

Another important variable to consider is the state of know-
ledge in the program area. If the problem being addressed is
poorly understood and more research is necessary before any
large-scale action is undertaken, the committee model may
be the best option, providing as it does for input from a
wide variety of perspectives. Of course, if an emergency
situation is also one about which very little is known,
these two variables must be weighted somehow in order to
make a good decision. In practice this is likely to be a
highly arbitrary process, and one in which norms and values
are likely to play an important role.

Closely related to the knowledge variable is the state of
technology in the program area. If the relevant facts in
a given situation are agreed upon by experts in the field
but their applications have not been fully developed, there
may be no need for the perspective provided by the committee
strategy. In such cases, a more focused approach to program
development is indicated, and this is best secured by means
of reorganization.

The complexity and magnitude of the problem being dealt with
are also significant variables. If it is so large or complicated
that the other functions of the organization seem dwarfed by
comparison, it is probably wiser to reorganize than to risk
taxing the existing structure beyond its resources. On the
other hand, if the problem is minor or relatively straight-
forward in nature, the strong central authority model would
probably be most appropriate, as the problem of resistance
to a plan imposed from without would be negligible.

The resources available for combatting the problem are another
important constraint. If the organization has allotted abundant
financial resources and personnel to the development of a
program, it might be worthwhile to reorganize. On the other
hand, if the problem must be faced with limited resources,
this would probably be impractical because of the start-up
costs which would be incurred. Another resource which should
be considered is the amount of time the organization expects
to remain involved with the problem. Clearly, if it is
anticipated that the program will last for only a week, it
would be foolish to undertake a reorganization effort.

Finally, there may be legal constraints within which the
decision must be made. It may not be possible to reorganize
the division of labor if the existing structure of the
organization is prescribed by law. Conversely, the legisla-
tion for a program may specify a strategy without regard to
the variables enumerated above.

While consideration of the different variables is often use-
ful, inevitably different considerations will indicate mutually
incompatible strategies. The process of weighting the
different criteria will determine the choice, but it is at
this juncture that the smooth course of "scientific management"
is interrupted. As no decision is "value-free," the process of
judgment will of necessity be influenced by the biases of the
organization as a whole and, in particular, those of the
decision-maker. Thus, organizational norms and values will
inevitably figure in the decision-making process, and it
follows that any organization striving for efficient admin-
istration should make an effort to articulate and analyze
this aspect of decision-making. While the values of the
individual decision-maker are harder to pin down, they too
should be analyzed as thoroughly as possible.

The Role of Evaluation

It is evident that any administrative decision will necessarily
be based upon a degree of uncertainty. One important component
of program management which helps to compensate for this is

evaluation. A program can be evaluated at the planning stage,
during early implementation, after full implementation, or at
all of these points.

At the planning stage, the major role of evaluation is to assess
the feasibility of the projected program. An administrative
checklist should be employed to evaluate the planning document,
making sure that proper provision has been made for program
administration guidelines, cost guidelines, training specifica-
tions, and the like. The evaluator should insist upon a clear
statement of program objectives and a structure which will
facilitate evaluation of the program at later stages. Addi-
tionally, outside experts should be consulted to assess the
technical feasibility of the overall program plan.

The next step is to evaluate the program in actual operation.
The best way to assess the plan at this stage is to set up
small demonstration programs and appropriate control groups.
This is essentially an empirical effort similar in scope to
the earlier (theoretical) feasibility study. Of course, if
the situation the program is designed to address is one
requiring immediate action, this phase of the evaluation
would probably have to be omitted, and the planning evalua-
tion would likewise be compressed. However, when circumstances
do permit the employment of these preliminary program evalua-
tions, they are well worth the relatively small expense involved.
Their use may permit early correction of errors which might be
quite expensive to remedy once the program has been fully
implemented.

The next stage of program evaluation, which follows full
implementation, should be an effort to determine the actual
impact of randomly selected projects within the program.
These projects can be analyzed in much the same way as the
demonstration programs. This kind of evaluation serves to
accumulate some data relating to the program, and is likely
to have some payoff in terms of overall efficiency simply
because program participants will be alerted to the possibility
of evaluation. Project evaluation of this type can take any
one of several forms, depending upon the degree of precision
desired. The quickest and least expensive method is to analyze
the efficiency of program management without attempting to
assess actual effectiveness. This involves a delivery systems
analysis based on a management audit of the projects selected,
checking such items as record keeping and staff qualifications.
A somewhat more precise evaluation can be obtained by con-
sulting an outside expert for a critical analysis of a
particular project. And the best (but also the most expensive)
evaluative method that can be implemented at this stage is an
overall project impact analysis, which does make an effort to
assess effectiveness by conducting extensive client follow-up
or other direct impact studies.

Finally, an assessment of overall program impact can be made
bv applying the methods used in project analysis to a sample
selected according to appropriate statistical techniques.
This form of evaluation is the most expensive of all, but
also the most precise.

When a program cuts across the established division of labor,
the process of evaluation can be performed in accordance with
any of the three organizational models described. Moreover,
the selection of an organizational approach to evaluation can
be made independently of the overall program strategy choice.
For example, there is no reason why a program formulated within
an intraorganizational committee could not be evaluated by a
strong central authority.

Indeed, the most effective evaluation approach in most cases
that cut across the established division of labor appears to
be the superagency model. Evaluation desks could be stationed
within all participating organizational units for purposes of
data collection, but the evaluation process would encounter
minimal conflicts of interest if these officials reported to
a central evaluation authority close to the top of the
organizational hierarchy. Such an authority might be a
permanent component of the organization responsible for
evaluation of all organizational efforts.

CHAPTER II
THE CASE OF HEW'S INTRADEPARTMENTAL COMMITTEE ON CHILD ABUSE

Background

The U.S. Department of Health, Education, and Welfare recently
adopted a new management tool, the Operational Planning System
(OPS), as part of an effort to increase the Department's
efficiency and effectiveness in administering its programs.
This tool was developed in response to the Federal govern-
ment's "Management by Objectives" policy, which emphasizes
the importance of clear statements of all program objectives
and the need for careful monitoring of progress in achieving
those objectives. It is an effort to facilitate the evalua-
tion process by ensuring that expected results are established
before a program is implemented. It is designed to expose
disagreement on basic goals by requiring clear statements of
those goals.

OPS is the primary tool used by HEW to implement this theory
of management. It requires that measurable, short-term,
results-oriented objectives be defined. For each objective,
the program manager is required to develop detailed operating
plans, indicating specific milestones necessary to achieve
the objectives and the expected completion date for each
step. In addition, an explicit statement of the resources
needed to accomplish each objective is required. Through
management conferences, the Office of the Secretary then
monitors the progress of various Department programs in
accomplishing their objectives. This monitoring process
serves as a model for managers at lower levels in HEW to
use in charting the progress of efforts to accomplish other
OPS objectives.

Over the years, HEW has frequently made use of intra-
departmental committees when confronting problems which cut
across agency responsibilities. This approach has met with
varying degrees of success. One of the first opportunities
to form an intradepartmental committee under the new
management system arose in 1973, when the Department decided
to formulate a program to address the problem of child abuse.
This chapter will be devoted to a detailed discussion and
critical analysis of the progress of the intradepartmental
committee assembled for that purpose, and will draw upon the
framework developed in Chapter I.

The Mondale Bill: An Incentive for Action

HEW has been responding to the child abuse problem in a
limited way for some time prior to 1973. Various aspects
of the problem has been attended to by a number of HEW
agencies in the general context of child welfare, but there was
had been no attempt before this time to attack the particular
phenomenon of child abuse in any comprehensive way. There was
minimal interagency communication regarding what little was
being done in the area, and much of the time, "involvement"
consisted simply of supplying states with funding to combat
the problem in any way they chose.

These conditions might well have continued indefinitely (for
child abuse is by no means a new social problem), but for a
legislative initiative on the part of Senator Mondale in
early 1973. This action prompted HEW to formulate a sub-
stantive program to study the problem and help the victims.
The Administration opposed the Mondale Bill - the Child
Abuse Prevention and Treatment Act - because it covered a
problem HEW already had the authority to address. Despite
this fact, however, this authority was not used extensively
until the legislative process began.

Hearings on the Child Abuse Prevention and Treatment Act
were held before the Senate Subcommittee on Children and
Youth of the Committee on Labor and Public Welfare in March
and April 1973 and before the House Select Subcommittee on
Education of the Committee on Education and Labor in October and
November 1973.10/ As might be expected, there was substantial
duplication between the House and Senate hearings. Together,
they covered eight days, and included sessions held in
Congressional chambers and in hospitals in Denver, New York
City and the District of Columbia, which have initiated
experimental child abuse treatment programs.

Testimony was presented by sociologists, medical researchers,
and legal experts knowledgeable about various aspects of
the problem of child abuse, and also by social workers,
doctors, and lawyers participating in the programs at the
hospitals visited. There were other witnesses without any
official expertise but with extensive experience in privately
supported prevention and treatment efforts, such as Ms. Jolly K.,
founder of a self-help group called Parents Anonymous and a
former child abuser herself. In addition, representatives of
the Executive Branch articulated that branch's opposition to
the proposed statute.

The testimony ranged in tone from sensationalistic to scholarly.
Slides of battered children, journalistic accounts of extreme
cases of abuse, and medical case histories were presented,
together with more temperate analyses of the causes and effects

of child abuse. Existing treatment and prevention programs
and the history of state legislative efforts to handle the
problem were also examined.

The underlying theoretical issue that recurred during the
discussion, and which is the key to understanding the various
practical alternatives considered during the hearings, is a
broad question involved in many areas of social policy
making. Implicit or explicit in the statements of the
various witnesses was one of two assumptions: Child abuse
(or, for that matter, crime, drug abuse, or any other social
problem) was viewed either as a symptom of individual pathology
or as a socially determined phenomenon over which the abuser
has little personal control.

Proponents of the former view emphasized the incidence of
child abuse in all socioeconomic strata. In general, they
tended to focus on those characteristics of abusers dis-
covered by research which appear to be static. For instance,
members of this group repeatedly stressed the finding of
Dr. C. Henry Kempe, Director of the National Center for
Prevention of Child Abuse in Denver and one of the foremost
medical researchers in this field that frequently adults who
batter children were themselves abused or neglected as
children. They also emphasized the fact that abusers often
have unreasonable expectations of their children, sometimes
even to the point of a role-reversal. In these cases,
parents look to their children as a source of emotional
support and personal gratification rather than perceiving
their own role as one of supplying care and support.

Dr. Brandt Steele, the Denver Center's chief psychiatrist,
found that, as one might expect, abusers tend to have
strong ideas about the need for strict discipline. He
observed that they generally lack self-control and simply
take out their personal frustrations on their children.
Indeed, many male perpetrators of child abuse are also
wife batterers, as Dr. Annette Heiser, a member of the Child
Abuse Team of Children's Hospital in the District of Columbia,
pointed out. It was frequently emphasized by those who view
child abuse as a symptom of individual pathology that abusers
seem generally insecure and lacking in self-confidence.
Ms. Jolly K. described a recurring phenomenon called
"scapegoating" - the abuse of one child in a family in
which the other siblings are well cared for. This behavior
seems to occur when a parent sees a resemblance to herself
or himself in the victim and projects her or his own feelings
of worthlessness onto the child.

In general, those who view child abuse as an individual
pathology consider all of these characteristics to be person-
ality problems of a psychological nature. The opposing
point of view recognizes all of these findings but places
them in a societal context, interpreting the abuser's
insecurity not as a personal characteristic but rather as
a function of her or his position within an unhealthy social
order. Dr. Kempe is one of the primary exponents of this
view (although some of his research has been used as a
basis for the other position). In his testimony, he was
quick to point out that while many of the well-publicized,
sensationalistic incidents of child abuse are probably
psychopathic, such cases account for only about 10 per cent
of reported incidents. The other 90 per cent are of lesser
intensity, he explained, and are usually salvagable situa-
tions. Since cases of low intensity are less likely to be
reported, this figure is probably higher than 90 per cent
in actuality. Moreover, Dr. Kempe suggested, the psycho-
pathic cases are but exaggerated versions of the others,
and are likely to stem from the same basic causes.

Dr. David Gil, a professor of Social Policy at Brandeis
University, who has conducted important sociological research
on child abuse, was one of the most articulate proponents of
this viewpoint. In his testimony, he emphasized the pre-
valence of arbitrary authority and violence in our culture,
and the general acceptance of corporal punishment in child-
rearing as causes of child abuse, pointing out also that
the combative expectations of society and the decline of the
extended family have been important in fostering social isola-
tion and, as a consequence, personal insecurity. Public
forms of abuse and neglect, especially in schools, have their
roots in the same cultural factors, according to Dr. Gil.
He views children born into poverty as victims of the most
devastating public abuse of all: malnutrition and hunger,
substandard living conditions, poor medical care, and
inadequate education. Their parents, moreover, losers in
a social order which extols upward mobility, are more
vulnerable than the rest of the population to feelings of
personal insecurity. Indeed, while child abuse occurs in
all socioeconomic strata, Dr. Gil suggests that poor people
probably account for a disproportionate percentage of
incidence.

This theoretical controversy provides a framework for under-
standing the various practical alternatives proposed during
the hearings for treating the problem of child abuse. Each
set of assumptions points toward a corresponding set of
social policies.

The view that child abuse is pathological behavior is
reflected in the proposal that profiles be developed of
the "high-risk" parent, based on the personality traits
judged as determinative. Vincent De Francis, Director
of the Children's Division of the American Humane Association,
argued in the hearings that this would facilitate the screen-
ing of prospective parents in an effort to spot probable
abusers before they actually have children. Treatment
methods that emphasize punishing child abusers and relocating
the victims in foster homes embody the same basic approach
to the problem.

In contrast, the view that child abuse is a problem rooted
in society rather than the individual suggests preventive
policies such as a law against corporal punishment. This
measure, supported by Dr. Kempe, among others, would give
children the same protection against physical assault as
adults, both in the family and other socializing institu-
tions. From this perspective, as Dr. Heiser emphasized,
punishment is seen as essentially reinforcing the abuser's
insecurity, and thus is by no means a satisfactory form of
treatment.

The basic philosophy of those with this viewpoint is that
efforts ought to focus on the rehabilitation of the affected
family, a process which necessarily involves the reshaping
of other social institutions in such a way as to provide
real support systems for family members. This might include
such steps as improving family planning education or establish-
ing enough day care facilities for families of all income
groups. This would afford parents some relief from the
burden of child-rearing as well as an opportunity to over-
come their isolation by interacting with other adults.
Dr. Kempe suggested that in order to combat the problem
of child abuse, society must have access to children before
they reach school age, perhaps through a health visitor who
would call regularly on each young family to ascertain that
small children were receiving their basic health rights.
Finally, as Dr. Gil emphasized, this approach would require
a commitment to providing decent living conditions for all
Americans and their families.

While consideration of these policies and the theoretical
ideas they reflect was a primary focus of the hearings,
none of these issues was resolved in the final version of
Child Abuse Prevention and Treatment Act. There was agree-

ment on some items, and the bill provides that to be eligible
for "technical assistance" (direct subsidy of existing
programs) from the Federal government, states must meet a
series of requirements. They must have:

- a child abuse reporting law with immunity
  provisions;

- procedures for investigating reported cases to
  substantiate their accuracy;

- a multi-disciplinary approach to treatment;

- provisions for a guardian ad litem for any
  abused child involved in a court case; and

- systematic dissemination of information about
  the problem to the public.

Another clause, reflecting Congress' uncertainty about the
more controversial issues, requires that states demonstrate
their ability to "deal effectively" with child abuse and
neglect cases to be eligible for technical assistance.

The actual process of decision-making that determined the
shape of the final version of the bill is not explicit in
the transcripts of the hearings, but a number of factors
seem clear. While at times the Congressmen present at the
hearings indicated their sympathy for the theoretical
approach calling for a program of broad social change, they
decided against incorporating this perspective into the
statute itself because they feared such a bill might not
be signed. Together with this strategic consideration, it
appears that the general feeling was that child abuse was
not yet understood well enough by either side in the
controversy to justify taking a firm position.

This question was itself hotly debated during the hearings.
All the participants agreed that the incidence statistics
are of limited value because of incomplete reporting and
record keeping, and the majority of the witnesses agreed that
most existing programs are ineffective, not only because
they are inadequately funded but also because of methodo-
logical deficiencies. However, many witnesses pointed out
that on the basis of what is already known it is clear that
there is an urgent need for service to victims of abuse
and their families. The bill responds to this appeal with
the "technical assistance" provision outlined above, ear-
marking 20 per cent of the authorized funds for this purpose.

The bulk of the funding is to be used for grants to demon-
stration programs which may or may not involve actual
service. Their main purpose is to test alternative programs
and to investigate further the causes of child abuse.
There is a specific provision encouraging these programs
to explore the relationship between drug abuse and child
abuse, for example.

The bill also creates an advisory board comprised of represen-
tatives of all Federal agencies involved in programs relating
to child abuse and neglect for purposes of facilitating inter-
agency cooperation. This replaced the provision in earlier
versions of the bill for a study by a commission of outside
experts. The revision is in accordance with the current
trend away from such panels of experts because past experience
has demonstrated that they frequently accomplish little.
However, in this case such a panel might actually have proven
quite useful in coordinating the research efforts around the
country from a position of technical expertise rather than
from the vantage point of a group of administrators.

In testifying before the House and Senate subcommittees on the
proposed legislation HEW spokesman took the position that child
abuse can be handled adequately, and, indeed, this is already
being accomplished in some states without special legislation.
When HEW's Assistant Secretary for Legislation, Stephen
Kurzman, explained this position at the Senate hearings, it
was met with impatience; particularly when it became clear
that Mr. Kurzman had almost no information about the state
programs HEW said it was supporting. Mondale subcommittee
members expressed even more skepticism about the sincerity
of the Executive Branch's commitment to the whole problem
of child abuse when they learned that there was not one
person in any government department working full-time in
this area. When HEW's Assistant Secretary for Human
Development, Stanley Thomas, testified at the House hear-
ings some months later, he seemed as poorly informed as
Mr. Kurzman had been about the details of HEW's connection
with state efforts.

Thus, the Executive Branch's testimony posed no threat to
the proposed legislation. It was consistently ridiculed,
and at one point, the Administration was threatened that
any effort to interfere with the bill's passage in the House
would be countered by showing slides of battered children on
the floor.

The Evolution of HEW's Child Abuse Pr ram

Within HEW, there was an immediate reaction to Senator
Mondale's legislative initiative. On April 3, 1973, a
week after Assistant Secretary Kurzman testified at the
Senate hearings, the Assistant Secretary for Human Develop-
ment, Stanley Thomas, received a memorandum from the Deputy
Assistant Secretary for Management Planning and Technology,
Thomas S. McFee, suggesting that the Office of Human Develop-
ment formulate a high-priority OPS objective in the child
abuse area. The memorandum expressed concern over the poor
impression made by Kurzman's testimony, and suggested that
the Administration's position might be improved by the
development of such an objective. It further suggested
that the effort be led by the Office of Child Development
(a branch of the Office of Human Development), but that it
reflect a Department-wide perspective.

On April 4, the next day, Secretary Weinberger requested a
draft of such an objective and on April 5, Assistant
Secretary Thomas held a meeting with the Assistant Secretary
for Health, Dr. Charles Edwards, and the head of the Office
of Child Development (OCD) to discuss the problem and possible
departmental action. Their dialogue resulted in a memorandum
to the Secretary, dated April 16, 1973, expressing concern
over the fragmented state of the Department's child abuse
programs. This document, signed by both Thomas and Edwards,
made reference to the Mondale hearings, noting that Kurzman
had indicated there that OCD would lead HEW's effort. In
the memorandum, the Assistant Secretaries recommended that
an intradepartmental committee chaired by OCD be established
to analyze the problem and prepare an OPS plan. The memorandum
also described departmental activities related to child abuse
to be undertaken pending the formation of a committee,
including NIMH support for a conference on child abuse in
June 1973, at the D.C. Children's Hospital, and studies of
various aspects of the problem by OCD and SRS (Social and
Rehabilitative Services). Attached to this document was a
memorandum for the Secretary's signature, directing the
Department to form the recommended intradepartmental committee.

More than two months later, on June 22, 1973, the Secretary
issued a memorandum nearly identical to that drafted by
Assistant Secretaries Thomas and Edwards. The only major
addition was the specification that the Department allocate
a total of $4 million to the problem in fiscal year 1974, to
be shared by various agencies within HEW. The Secretary's
memorandum also stipulated that the intradepartmental

committee be assembled by June 25. The new intradepartmental
committee held its first meeting on July 16, 1973, at which
current agency efforts in child abuse were identified. In
addition, a preliminary set of specific agency task assign-
ments was discussed together with a preliminary form of the
OPS objective, which OCD had drafted in anticipation of the
Secretary's action.

The Committee enjoyed high-level attention from the beginning.
Its progress was discussed at the meetings of the Human
Development (HD) Management Conference, which the Secretary
attended, and recommendations made at these meetings were
regularly relayed to the committee. A July 17, 1973
memorandum from the Assistant Secretary for Administration
and Management to the Secretary, briefing him for the HD
Management Conference of July 19, summarized the preliminary
child abuse objective and described the first committee
meeting. The memorandum noted that the objective was
expected to be put into final form by mid-August. The
memorandum also pointed out that "One major issue critical
to meeting this deadline is the immediate determination of
the exact monies to be contributed by the respective
agencies toward the effort." The Secretary had already
indicated that the Department would spend $4 million in
the child abuse area, but no decision had been made on
how much each participating agency should commit.

The Secretary's immediate reaction to this memorandum was
one of concern over the slow progress being made. In a
memorandum dated August 7, 1973, Deputy Assistant Secretary
McFee described the HD Management Conference discussion of
the child abuse effort as follows.

> The Secretary expressed his concern that
> the child abuse effort was not yet finalized.
> He said that, while HEW is opposing Congres-
> sional efforts in this area, no alternative
> approaches nor activities seem to be
> generated by the Department. He said it is
> vital that the public be better informed of
> HEW activities in the area and asked that OPA
> (The Office of Public Affairs) participate in
> the planning and implementation efforts of the
> intradepartmental committee as well. Mr. Thomas
> indicated that he felt it was possible for the
> committee to produce a creditable interagency
> objective on child abuse by August 15.

> Mr. Caldwell remarked that by waiting until
> August 15 to announce a major child abuse
> effort we might well be accused by the
> Congress of sandbagging . . .

Clearly this concern on the part of high-level administrators
with Senator Mondale's legislative initiative played an
important role in shaping the child abuse program formula-
tion process.

Meanwhile, the intradepartmental committee continued to meet.
On August 2, 1973, the agency sub-objectives drafted by OCD,
SRS, and the Office of Education (OE) were presented and
discussed, and by the August 13 meeting the remaining
agencies had drawn up their sub-objectives. This later
meeting also included discussion of the problem of agency
contributions to funding the program, an issue ultimately
resolved by means of intervention from above. (A memorandum
dated August 23 from the Department Controller to all the
Assistant Secretaries dictated a breakdown of the Depart-
ment's $4 million commitment among the agencies.)

The key action steps formulated independently by each agency
were assembled into a set of departmental objectives by OCD,
which also composed an overall objective statement, justifica-
tion, and approach, and grouped the agency sub-objectives into
four activity areas: demonstration; research; information
collection and utilization; and standard setting and guide-
line development. The key action steps of the various
agencies were simply arranged in chronological order by OCD;
in cases where more than one agency had identified a particular
subobjective, their efforts were simply merged. There was
no effort to formulate an overall departmental strategy for
child abuse; rather, each agency undertook whatever action
it deemed appropriate; communication channels were established
among participating agencies; and the sum of these individual
activities was then styled an "intradepartmental" effort.
This "cut and paste" approach was a major weakness of the
process. The package of agency sub-objectives together with
the OCD statement of overall objectives was submitted to
the Secretary on August 17.

In a memorandum dated September 11, 1973, Robert H. Marik,
the Assistant Secretary for Administration and Management,
offered some specific criticisms of this set of sub-objectives:

> We were looking for efforts which would
> involve the utilization of DHEW systems
> currently in place, as systems, to respond
> to and impact on child abuse, e.g., school
> systems, Head Start Centers, welfare
> systems, Mental Health Centers, Alcohol
> Treatment Centers, etc., in addition to
> longer term strategies . . . Could we, for
> instance, direct EPSDT efforts to specifically
> screen the incidence of child abuse . . .
> Currently there is the appearance that the
> proposed activities weren't developed
> against a specific, well-defined strategy
> but submitted piecemeal without regard to
> an integrated goal and results. I now
> urge you to restructure the objective
> around areas of major outcome and results . . .
>
> I also urge that any subsequent reorganiza-
> tion of the objective also simplify it and
> reduce its volume.

Although these seem to be valid criticisms of the way the
objective was formulated, OCD's formal response to these recom-
mendations in the revised objective submitted on September 21,
1973, did not contain the "specific, well-defined strategy"
sought by the Assistant Secretary. Despite this, after some
essentially superficial revisions, the objective was resubmitted
and recommended for approval by the Secretary in an October 12,
1973 memorandum from Assistant Secretary Marik. This docu-
ment also included some laudatory remarks about the conduct of
the intradepartmental committee in developing the "joint"
objective, listing the following "ingredients" as having
been "critical to the success of this effort":

- clear communication from the Secretary to
  agency heads with respect to his expectations;

- designation of a leader for the effort and
  clear indication of this selection to the
  Department;

- Assignment of committed, competent, and tena-
  cious personnel to the planning committee -
  personnel who were given authorization to speak
  for and had access to their agency head and his
  representatives; and

. the insistence of the lead agency that the
  planners meet on a regular basis and plan as
  an integrated unit, rather than splitting into
  smaller planning groups, until the objective
  was broadly developed, and agreed to.

These are rather stringent criteria, but if they are in fact
used to measure the "success" of an intradepartmental com-
mittee, this one cannot be judged entirely successful.
Certainly there was communication between the Secretary and
agency heads, but it was in no way "clear . . . with respect
to his expectations." Pe did make clear his concern that
the Department do something in the area of child abuse, but
was not at all specific. As for the last criterion, that
the committee plan as an integrated unit, that also did
not occur. Instead, each agency reported its own plans to
the group, and OCD supplied an element of organization to
the resulting compilation of objectives.

Nevertheless, the Secretary approved the revised objective on
October 19, 1973. On October 5, Assistant Secretary Thomas
had testified before the House Committee hearings on the
pending child abuse legislation, and his statement emphasized
the new initiative, praising in particular the success of the
intradepartmental approach. He also emphasized, as had HEW's
representative at the Senate hearings, that the Department
had previously supported state efforts to combat child abuse,
an assertion questioned by some of the legislators. The
majority of the Committee members appeared to be of the opinion
that the new HEW initiative in the area of child abuse had
arisen in response to the legislative initiative, and not
out of any broader recognition of the importance of the
problem. Representative John Brademas of Indiana, articula-
ting the sentiments of the Committee, made this comment.

> While I do want to observe that I am
> somewhat impressed by the response of
> the Executive Branch, I think that you
> should appreciate the value of us as
> legislators. We introduce these
> programs, and the Executive Branch
> quite erroneously, without foundation,
> says: "We have the authority to do
> something about it." But you look
> and you find out that they are not
> doing anything about it.
>
> I, therefore, would want to express
> a certain degree of apprehension
> about the continued commitment of

> the Executive Branch of coping with the
> problem of child abuse absent of some
> Federal legislation in this regard. I
> appreciate your goodwill, and that of
> your associates, but I just observe that
> in too many instances this kind of con-
> cern can vary from upper levels of the
> Executive Branch.11/

The Congressmen also criticized HEW's new initiative on the
basis that it was overly oriented toward research and develop-
ment at the expense of actual service. However, the final
version of the bill developed by the Committee had the same
weakness. In fact, HEW's initiative closely resembled what
the statute authorized. The Administration's contention
that no further legislation was necessary for the Department
to deal with child abuse thus proved true; however, at the
same time, the evidence suggests that HEW's initiative would
not have occurred when it did but for the introduction of
this technically superfluous legislatio:.

Once the bureaucratic machinery was set in motion and the
objectives were explicitly formulated, it was a matter of
carrying out the plan. The intradepartmental committee
continued to meet regularly to review progress on the
objective, and progress reports were submitted regularly
to the Secretary. There were some problems, mainly
related to timing; in many instances, activities took
longer than had been anticipated. But generally things
went smoothly. The legislation was enacted on January 31,
1974, by which time considerable progress toward achieving
the objectives had already been made. However, as is pointed
out in a December 12th memorandum from Deputy Assistant
Secretary McFee to Secretary Weinberger, summarizing the
discussion of the child abuse objective at the HD Management
Conference of December 4, 1973,

> Although newly proposed bills on child
> abuse will be a goad to the committee's
> efforts, there is nothing in them to
> date to indicate DHEW should reorganize
> its current efforts.

And in fact they did not. The committee effort proceeded
smoothly despite some minor delays.

In April 1974, the Secretary requested an assessment of the
efficacy of the intradepartmental committee as a vehicle for
cross-cutting initiatives. In response, Assistant Secretary
Thomas wrote a memorandum in early June 1974, in which he
described the history and procedures of the committee as a
working group.

His assessment was quite favorable. He described the
Secretary's personal interest in and support of the child
abuse initiative as "the single most important element in
the success of the program," pointing out that it was the
Secretary's memorandum of June 22, 1973, which established
the committee, and also underlining the importance of the
August 23 memorandum that established each agency's fiscal
contribution to the effort. "These two directives set the
early framework within which the committee could begin its
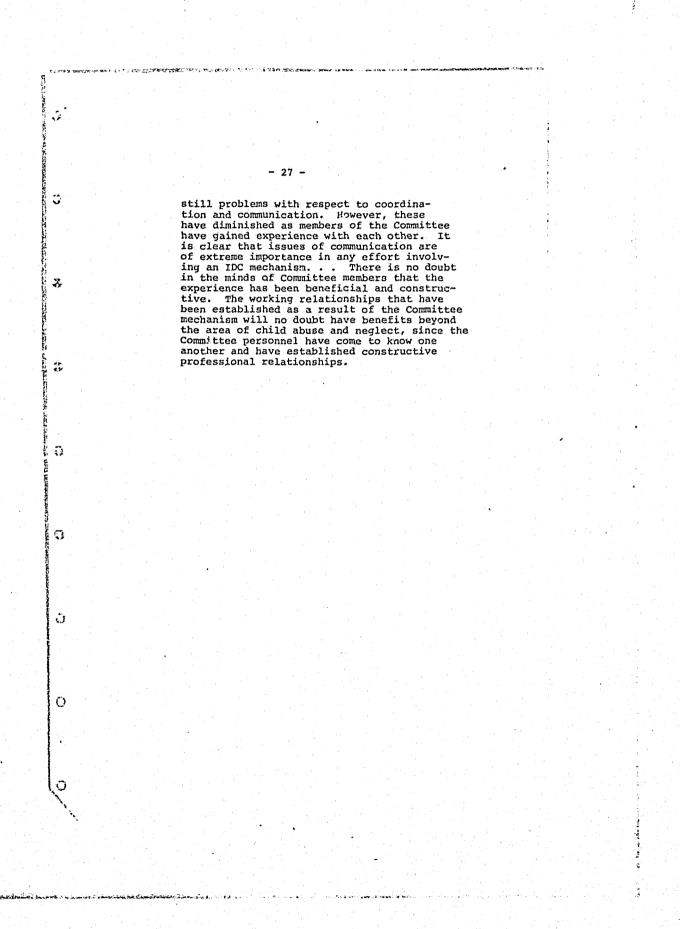substantive efforts."

Assistant Secretary Thomas then assessed the performance of
the committee subsequent to these events that led to its
establishment.

> The need to work together in a coordinated
> manner prevented duplication of effort and
> allowed the various agencies to coordinate
> their efforts and decide who should fill in
> identified gaps. . . The Committee from its
> inception has met regularly and frequently.
> Initially it met weekly or bi-weekly. As
> the Committee moved towards the implementa-
> tion of the objectives it met on a regular
> monthly basis. OCD, as the lead agency,
> was in frequent contact with individual
> agencies between meetings, either
> personally or by telephone, in order to
> discuss progress, problems, issues and or
> questions. Monthly program reports through
> the OPS system were prepared for my review
> and action, and this served as a means of
> charting programs, identifying slippages
> and problems, and taking appropriate action
> to minimize and resolve the slippage and
> problems.
>
> There is no doubt that the intradepart-
> mental committee served as a sound and
> constructive mechanism in the coordination
> of cross-cutting initiatives. There are

still problems with respect to coordina-
tion and communication. However, these
have diminished as members of the Committee
have gained experience with each other. It
is clear that issues of communication are
of extreme importance in any effort involv-
ing an IDC mechanism. . . There is no doubt
in the minds of Committee members that the
experience has been beneficial and construc-
tive. The working relationships that have
been established as a result of the Committee
mechanism will no doubt have benefits beyond
the area of child abuse and neglect, since the
Committee personnel have come to know one
another and have established constructive
professional relationships.

CHAPTER III
THE EFFECTIVFNESS OF THE INTRADEPARTMENTAL
COMMITTEE ON CHILD ABUSE

If the performance of the intradepartmental committee on child
abuse is judged according to its own standards, it measures up
reasonably well. In the original statement of the objective,
the effort as a whole was characterized as follows.

> The focal point of our national effort in
> child abuse should be to impact on these
> various (state and local social service)
> systems in order to reduce fragmentation
> of efforts, crystallize relevant questions
> regarding identification, legislation,
> rehabilitation and prevention, education,
> and research, as well as to enhance com-
> munication regarding new programs, and
> the provision of new guidelines.

The committee does appear to have been successful in opening
up communications in the child abuse area, both among the
different HEW agencies and between Federal, state and local
agencies. However, communication is not the same as
coordination, and while duplication of effort seems to have
been averted for the most part, there is little evidence that
much systematic thinking was done on an inter-agency basis,
as has been noted.

If the intradepartmental committee is judged by the standards
of administrative science discussed in Chapter I, some
deficiencies are readily observable. The most striking of
these is the lack of a clear-cut, overall strategy for the
Department. Each agency was free to formulate its own
strategy, but the resulting collection of ideas was bound
together without the guidance of any systematic thinking as
to what might be the best departmental strategy for handling
the problem of child abuse. The only apparent basis for
altering an agency's proposed activity was the anticipation
of duplication of effort among agencies. The various
participating agencies were quite willing to cooperate on
this basis as no real challenge was offered to any of the
activities they proposed. In the case of NIMH, the sub-
objectives formulated were a logical development of the
agency's general responsibilities and priorities, and for
that reason no conflicts arose.

In the case of the intradepartmental committee on child abuse,
then, it appears that the lack of an overall departmental
strategy simply meant that the whole was no greater than the
sum of its parts. While in this particular case the program
worked out reasonably well despite this, it is clearly more
desirable to have an overall perspective reflected in the
planning process.

In considering the alternatives to an intradepartmental com-
mittee in a case which, like this one, cuts across established
agency lines, it seems clear that central planning might be
significantly enhanced by the use of either the strong central
authority model or the superagency model. But since these
strategies will not be used for every issue which arises, it
is worthwhile to investigate the potential for input from a
departmental perspective within the intradepartmental com-
mittee model.

In this particular case, there was a significant element of
political urgency, and at the same time a relatively small
amount of knowledge and technology available in the program
area. From a political standpoint, a major objective
appeared to be the mobilization of highly visible "action."
The decision to use an intradepartmental committee was there-
fore well founded. No relationships beteen agencies were
strained by shifts in authority; nor were there start-up
costs to contend with. Each agency was given an opportunity
to decide what action it wanted to take, within reasonable
limits, and at the same time the "departmental" objective
was assembled expeditiously.

The substantive dimension of the resulting program, however,
is more vulnerable to criticism. There was little apparent
effort to deal with the theoretical controversy surrounding
the phenomenon of child abuse in the intradepartmental committee
sessions. Since the focus of the Department's initiative was
on research and development in this particular instance, this
issue was probably less important than would usually be the
case. However, the way in which this and the other sub-
stantive aspects of the child abuse were handled suggests some
procedures that could be initiated to improve the intra-
departmental process in general.

For example, this process would be significantly more efficient
if an administrative checklist were employed to evaluate the
planning doucment in order to assure that proper provision
is made for program administration guidelines, cost guidelines,
training specifications, and the like. The evaluator should
insist upon a clear statement of program objectives and a
structure which facilitates evaluation of the program at later
stages.

Additionally, outside experts might be consulted to assess
the technical feasibility of the overall program plan. A
panel of experts could be assembled to assist the Department
in coordinating the research efforts around the country
from a position of technical expertise rather than from the
vantage point of a group of administrators. Such a panel could
also brief government administrators on the substantive aspects
of any given issue, thereby eliminating the impression of
unpreparedness such as that made by the representatives of
the Executive Branch at the child abuse hearings.

All of these suggestions would facilitate the transforma-
tion of the intradepartmental committee into a mechanism
through which a systematic overall strategy could be
developed. And, structuring such a mechanism is important
since it seems clear that the intradepartmental committee
model is likely to be selected more frequently than the
other alternatives discussed in Chapter I. Only matters
of great urgency are likely to require the formation of a
superagency, and the strong central authority model must
also be selectively applied.

In the vast majority of cases in which a problem cuts across
agency lines, then, the intradepartmental committee is likely
to be the chosen strategy. While the child abuse case is not
in every respect a typical one, this examination of it suggests
a set of general recommendations that might improve the
efficiency of the intradepartmental committee model within
HEW's framework of "management by objectives."

Recommendations

. Overall strategy formation:

The most striking weakness of the intraorganizational
committee model is the lack of any central planning
mechanism to ensure that a program is something
more than the sum of its parts. While this is an
inevitable feature of the basically decentralized
structure of the model, there are some mechanisms
that could help compensate for it. It is recom-
mended in this regard that greater emphasis be
placed on accountability, and that adequate access
to the knowledge and viewpoints of outside experts
and constituencies be assured.

. **Accountability**:

HEW's intradepartmental committee on child abuse
was monitored by the Office of the Secretary.
However, few intraorganizational committees can
rely upon an accountability mechanism of this
sort. It is recommended that some form of
rigorous evaluation of the policy making process
be institutionalized to ensure that any given
committee is making adequate progress.

HEW's new Operational Planning System is a step in
this direction. By requiring that milestones be
formulated in advance and by generally avoiding
duplication of effort, the system ensures some
accountability and is likely to increase efficiency.
But OPS does not ensure that substantive progress is
made. Therefore, it is recommended that the system
be revised to require that each OPS objective be
linked with some procedure for assessing its actual
effectiveness. In addition, the objectives them-
selves - the substantive outcome of the committee's
efforts - should be evaluated by some well-informed
outside party. This function could be performed by
a permanent organizational division with responsibility
for critical internal evaluation of all organizational
activities or by a qualified evaluator from outside
the organization.

. **Access to knowledge**:

In general, there is a poor flow of communication
between persons with technical expertise and high-
level administrators thoughout the governmental
bureaucracy. And yet, in our highly technological
society, it would seem imperative that social policy
be securely based upon expertise. While some members
of HEW's intradepartmental committee on child abuse
were technically knowledgeable in this area, there
was no systematic effort to educate the committee
as a policy making body. Nor was there any apparent
effort to familiarize committee members with the
viewpoints of other (inexpert) interested parties in
regard to the political issues involved.

No doubt there are informal channels through which
this kind of information is generally relayed.
Informal systems of communication, however, are

not totally reliable, and the interests of
political expediency can easily block or
distort information which is transferred
haphazardly. It is therefore recommended
that a formal mechanism of communication
between the experts and the policy makers
be institutionalized.

Direct communication between committee members
and outside experts unhampered by political
considerations might be arranged by simply
summoning appropriate witnesses to the com-
mittee sessions, as Congressional committees
do. In addition, any expertise residing in
civil servants should be made accessible to
the committee in some formal way. Also, com-
mittee members could make site visits to
existing programs to become familiar with the
technical aspects of the policy area about
which they are deliberating.

Of course, even with this ind of exposure to
technical knowledge, the actual policy decision
may be based primarily on political considera-
tions. Nevertheless, there are definite
advantages to direct communication between the
experts and the administrators, as should be
evident to the large proportion of public policy
makers who are committed to the management process
rather than to the political process.

In the case of HEW's intradepartmental committee
on child abuse, the only important political
consideration was that some "action" be initiated.
Clearly, in ..is instance, experts' knowledge and
recommendations could have figured more signif-
icantly in determining the actual policy choice.
Moreover, this case is by no means an unusual
one in this regard. Once budget levels (however
inadequate they may appear at times) are determined,
many programs in the health area are similarly free
from political constraints. While this is less
common in other areas (e.g., economic development,
civil rights, housing), a large proportion of HEW
efforts are of this nature, and it seems reasonable
to expect that improved expert input could have high
payoff for Department decision-making processes.

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- Further study:

It is further recommended that, after the
intradepartmental committee process is
formalized in accordance with the above recom-
mendations, further study of the problems raised
here be initiated. As has been noted, the present
investigation focused on an issue which enjoyed
high-level attention. Cases without this char-
acteristic should also be examined. Careful
study of the intradepartmental committee process
is especially important because of the frequency
with which this organizational device is utilized
in the Federal government. With the new Federal
administration, which promises to employ a less
centralized approach to policy formulation, rely-
ing more heavily on departments, the use of the
device will probably become even more common.
Thus, further study of the intradepartmental
process leading to more suggestions for improving
it, might have significant pay off.

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FOOTNOTES

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4. Ibid., p. 79.

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7. Harold Guetzkow, "Interagency Committee Usage," Public
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8. See Paul Y. Hammond, "The National Security Council as
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10. Child Abuse Prevention Act, 1973: Hearings before the
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11. House Hearings (Ibid.), p. 103.

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