

INTERNATIONAL CITY MANAGERS' ASSOCIATION  
Washington Office  
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Summary of responses to questionnaire circulated to city managers regarding local administrative problems most often encountered in their work with federal departments and agencies.

I. IS ADEQUATE INFORMATION CONCERNING BOTH NEW AND ONGOING PROGRAMS AVAILABLE TO YOU? WHAT CHANGES IN APPLICATION PROCEDURES DO YOU SUGGEST?

The general information offered makes it difficult to place one program in context with others, as well as to determine which similar program offered by two different federal departments is best for the community to use; such as the two sewer facilities programs offered by HUD and EDA. In some instances, particularly for new programs, there is considerable delay between the time a program is announced and the guidelines are furnished. This can create budget and public relations problems with citizens' supporting groups. If standard guidelines could be developed for all applications, it would benefit the communities and expedite submission for review. For instance, the applicant could be permitted to designate the area where the program was to be carried out, the reason and need for aid, the administrative organization to implement the program, the relationship to other programs, together with legislative support for such a proposed program. This preliminary application could be an invitation for the federal department to send an expert representative or representatives to the community and work together with the involved local departments in developing a formal application to the satisfaction of both levels of government.

There is no regular updating service of federal programs such as Open Space Land or Planning. It is difficult to determine and be placed on a mailing list to receive requirement changes for qualifying for these grants. The process of submission and rejection and modification has been our experience in grant requests. To expedite processing, it would be our suggestion that (1) all applications be submitted in tentative form and acted upon on this basis in the preliminary process, and then after initial approval a formal submission be made. The Transportation Division concerned with the Mass Transit Act has this policy and it appears to be a workable procedure. (2) It would appear also that for large metropolitan areas a Regional Expediter could reasonably aid all communities in the preparation and submission of grant applications and further increase the speed with which they would be approved. It would also be more desirable if the Regional Office had a greater degree of authority in approval or disapproval of a project.

Within the last few years the FAA has not accepted a project application until all construction plans are completed, the project has been advertised and the contracts approved, conditioned upon final approval by the FAA. After all this work has been done, and prior to any federal commitment, the application may be submitted. The final document is a grant agreement, which is the actual contract between the sponsor and the federal government.

Information on new and ongoing programs comes to us much too slowly. An even more serious problem results from our regional office and field personnel not being indoctrinated in new programs at an early enough time. As to the changes in application procedures, we would suggest that the cost of project application be included in total project costs as a means of achieving more meaningful and better quality application.

There appears to be no effort on the part of the government to relate many programs to other government programs; example, Department of Agriculture Water and Sewage System with grants of HUD's Community Facility Program, or the Economic Opportunity Centers with the HUD Neighborhood Centers.

Application forms, generally, appear clear enough for ongoing programs. Our experiences with the Neighborhood Youth Corps, however, were anything but pleasant. Instructions were confusing, complicated, and guidelines changed from day to day and office to office. It cost the city almost \$500 to process our NYC application, and after six months' experience, we felt the program worthwhile, but the "red tape" too burdensome to continue the program.

Generally, we are able to obtain with little difficulty the information needed for the preparation of applications. The Federal officials always send this information when requested. However, this sometimes involves several telephone calls or considerable correspondence. The latest information about each program should automatically be sent to each city in the region, or at least to each city that has expressed an interest in the program. Occasionally, supplementary information about a program is sent to the regional offices but is not sent to the cities unless requested. Information concerning priorities that might be assigned to one project over another project is rarely given to cities.

The basic problem with the application submission and review process is that it appears to be designed for the smallest or the worst run cities. Many of the questions are ridiculous, when applied to the larger cities. A rather burdensome and expensive task is the requirement for copies of "all state and local laws, charters, etc." for each application in the same federal department. It would

seem that once a city has proven it has legal authority to accept the federal grant, it need not be proven again for each and every application. Finally, the guidelines for some programs are established one way, but the program is actually administered differently. For example, the Open Space Program guidelines are designed for a single application for all acquisition and development during the fiscal year. In practice, however, separate applications are required for each site, and even for the same site if development assistance is also requested.

The location of the regional field office makes routine communication difficult. We have found, however, that by making a distinct effort to become acquainted with those people in the regional office, who are directly involved with our applications, we are able to overcome many of the problems that distance creates.

It would be helpful if programs were grouped together by subject matter so a city could choose a particular program that would be most beneficial in accomplishing a particular project. For instance, there are at least five programs that we are aware of in the general field of Recreation, Open Space, Beautification, Outdoor Recreation, Development of Recreational Areas Adjacent to the Rivers by the Corps of Engineers, and Community Facilities. It is possible for a city to use any one of these five in developing the same recreational project. If a clearinghouse existed whereby one could discuss a particular project of recreation with officials well versed in all five programs, I think this would be of great assistance to the city and the objectives of the local project would be met with greater ease by the existing federal programs. It is difficult for a city to make the necessary contacts with these five programs when the regional offices are located in at least three major cities, all but one being some distance from our particular city. Consequently, we have tended to use the program where we can have firsthand contact with the people administering the federal interest in the program.

It would be helpful if large cities were advised directly of new and ongoing programs. This would enable us to plan ahead as well as express our opinions when policies are formulated.

With respect to ongoing programs (urban development), information is received in appropriate time for action and submission of necessary information. Application procedures for ongoing programs are adequate. Information on new programs is somewhat slow in coming, particularly if it is in form of amendments to existing legislation. Inability to take advantage of new programs is primarily one of lack of technical personnel qualified to prepare applications.

Our city received information recently regarding a program, submitted letters of application upon the advice of federal officials, and then sometime later received application forms for official filing. When the forms are not ready, it is suggested that the letter should be treated as an application and the follow-up forms as the supplemental filing, or the program should be held in abeyance and local officials so advised until the administrative machinery is established for orderly acceptance of applications.

Most HUD programs have reached a state, I believe, when experts must be engaged just to complete application forms and to relate them to the local situation. This may be necessary, at least to a degree, to protect federal funds, which is certainly a necessary obligation of federal administrators. On the other hand, an extreme and concerted effort should constantly be made to remember that the local administrator is more often than not working without adequate staff and funds, so that he is very hard pressed to do the elaborate job that apparently is expected.

I do not believe that adequate information concerning both new and ongoing federal programs is available to the local communities. When we do receive information it is usually late, or it does not provide sufficient guidelines in filling out the voluminous forms required. The federal regional offices are helpful but appear to be at times either understaffed or we are referred to a person in an acting capacity and continuity is not possible. I am sorry to say that in many cases we obtain better and quicker results by dealing with a Congressman or Senator to get things rolling.

We would suggest in general that all application instructions be isolated and placed in a booklet which would cover the necessary requirements for each grant program. If some standardization as to the material format could be devised, I am sure this would be helpful to local agency interpretation. It would also be useful, if such information could be provided in a form which would be different or perhaps somewhat more "popularized" than the official agency letters which set down various technical requirements. We would also suggest that applications relative to new programs be not accepted by federal agencies until some time has elapsed after the guidelines have been distributed. This would tend to result in uniformity of applications and possibly reducing reviewing time and eliminating duplication of effort by cities. The Federal Government should move more quickly away from the "first come, first served" basis of application processing so that cities would compete on the merits and needs of their proposals.

II. The question generally was stated: ARE RECOGNITION AND UNDERSTANDING OF LOCAL GOVERNMENT PROCEDURES EVIDENT IN THE DEVELOPMENT OF PROGRAMS AND SUPPORTING GUIDELINES?

Basically, I feel that federal requirements implicit in federal grant programs are beneficial to cities in that monetary incentive is provided to accomplish certain necessary local programs which might otherwise receive little attention or impetus, i.e. long-range comprehensive planning, metropolitan regional planning and projects which endeavor to solve problems which transcend local government boundaries.

Federal-local programs could be improved by (1) administering these programs through existing local agencies; (2) providing for long-range financial planning; and (3) improving communications.

It is not evident that local government procedures are always understood or recognized by those who finally authorize program and guidelines. One example: requirement of planning on SMSA basis, whereas the definition of SMSA is arbitrary and primarily intended for statistical reporting purposes. (Part of this particular city is not included in an SMSA description for some reason and is therefore left out of planning project.)

It would be helpful if panels of local officials could serve in a continuing advisory capacity to various Washington agencies. In this way, their programs could be more adequately geared to meet local government procedures. If such advisory panels are used, they should include representation from smaller cities as well as larger cities. Increased intergovernmental exposure (informal, through field visitations, or formal, through orientation seminars, etc.) would be extremely useful.

This gets to the fundamental question of the need for a continuous "dialogue"--to use that fatuous and repetitive federal term--from the beginning of a concept through the legislative process in the development of an administrative frame. There ought to be, and I suggest there has to be, some kind of meaningful consensus that a federal program is needed. It may be that we are all too concerned with the political assumption that national legislation must apply in every part of the country; and that it must provide something for everyone. Very few federal programs offer equal value in every state, and many simply have no validity in a particular region. I can see nothing wrong with this, and I can see a great deal of good in a concept that recognizes the need for flexibility in the application of a national measure. At the risk of seeming naive, I would hope that we are

past the point where it is necessary to have 50 of everything.

Federal administrators simply don't know very much about cities and particularly about the differences which exist among cities by reason of state laws, charters, and local politics. This is another way of saying that they either do not have, or are unwilling to use, the authority necessary to make a federal program workable within its basic concept. Federal standards are too often geared to the lowest denominator, with the result that cities are disqualified even though they are equally deserving of support on a relative scale.

Increased exposure of federal officials to local government would be useful. In the HUD intern program this is done to a limited extent when new personnel are assigned to a given city for approximately two weeks during the early days of the HUD employment. This might be enlarged upon, and might produce better results if it were done on an early basis, after the intern becomes a full employee. This could work the other way too in that new employees of local government could spend some time at various intervals with a federal program which they are carrying out at the local level. In brief, it can be very helpful for the local people to know the federal program and problems in a broad context, and for the federal employee to know more of city objectives, programs, and problems.

Speaking from the viewpoint of a small municipality, some ways should be developed to permit local administrators to give their views to federal agencies dealing with local government on administrative procedures. I do not mean talking with the mayors of a half-dozen large cities, but rather with the administrators of a variety of communities as to size and type, who have actually the responsibility of dealing with the federal agencies. This will be the mayor, in some cases, the city manager in others, and some sort of department head or agency administrator in still others.

Many times local political problems are not taken into consideration when the federal government officials evaluate progress in connection with the city's application for renewal of its workable program. I can remember on several occasions where the city's progress and the enforcement of the housing code was found to be deficient by government officials. At the same time, a rigid enforcement policy expanded to comply with the federal officials' request would undoubtedly have led to the repeal of the housing code. Consideration should be given to the political climate as well as to a theoretically established rate of progress.

The federal government is too often concerned with the adoption of certain "structure" to accomplish desired objectives. The standardization and structure of the Citizens Advisory Committee for Community Improvement best illustrates this point. We believe the locality should be encouraged to experiment with "structures" which will best enhance the obtaining of the desirable end in the particular locality.

We have sometimes observed federal program administrators whose job qualifications should have included local government training and experience. Something should be done to improve their political science and administrative background.

A large city with adequate legal, financial, and engineering staffs, and involved in a number of different federal programs, should not have to prove continually that it has the legal authority to receive federal grants; the technical ability to construct facilities that it has been constructing for years; the financial capacity to provide the necessary matching share. In spite of the mass of detail work necessary to prove these points, the final result is that the federal officials must take the word of local officials. Why, then, can they not do this more simply? A city which does not live up to the grant agreement must repay the grant anyway, and it could also be eliminated from future consideration for grants.

We feel that increased exposure of federal officials to local government would be quite helpful. Also, it would seem that federal agencies dealing primarily with cities should use more people with local government experience, especially at lower levels where procedures for review of federal applications are handled. These people may know engineering, law, or finance very well, but they often have little knowledge of modern city government.

### III. DO YOU EXPERIENCE ANY SPECIAL PROBLEMS CAUSED BY THE MULTIPLICITY OF CITIZEN ADVISORY COMMITTEES REQUIRED IN SOME FEDERAL PROGRAMS?

The existence of a variety of citizens advisory committees, required by a federal agency, tends to fragment our efforts, increase our workload, slow down activities and dissipate responsibility. In the machinery of our local effort to achieve minority employment, we are faced with the necessity of dealing with three or more committees for clearances. We long for a single strong advisory committee of highly competent citizens.

We have proposed that the multiplicity of citizens advisory committees required in the workable program be removed as a requirement inasmuch as they are ineffective and superfluous to the basic philosophy of citizen participation in community efforts. We agree that possibly a general executive committee of the mayor, consisting of the heads of the formal commissions and boards of the city, can replace such a requirement for advisory committees now in the workable program. It is apparent that this "make work" is wasteful of the citizens' time and is a subterfuge to satisfy the requirement of the federal government which in theory is desirable but is carried out by the normal citizens boards and commissions of the municipal government.

We have experienced special problems caused by the multiplicity of required citizen advisory committees and have found this kind of checklist approach almost unworkable because of the existence of already functioning citizen advisory committees. For example, for several years we have had a very active human relations commission interested in minority housing problems and doing a considerable amount of work in this area. For a couple of years, HHFA refused to recognize this as a bona fide minority housing advisory committee. They insisted upon the creation of a competing committee to perform the functions already being performed by the human relations committee and there was much ill will and confusion.

The multiplicity of citizens advisory committees required does present problems; in some cities we noticed shortage of talent having a sufficient sense of civic responsibility to be willing to serve. A variety of committees are more difficult to coordinate and special purpose committees tend to lack the necessary overview of the community's total program.



-- The great multiplicity of advisory bodies combined with an increasing number of both public and private agencies authorized to administer federal programs creates much confusion at the local level. Not only is the local citizen and public official confused but a continuation of this trend will definitely place local city councils in positions of being less responsive to their constituents.

I strongly feel that the Federal Government is insisting on form rather than substance. In regard to urban renewal, as an example, if the Citizens Advisory Committee on Community Improvement did all of the things contained in the guideline, it would be infringing on the responsibilities of a number of department heads and existing advisory agencies. The need, I believe, is for the federal people to insist on the citizen participation aspect to be accomplished but not on any particular structural form to do it.

A major problem we have encountered in connection with a workable program is that of finding a meaningful role for the citizens advisory committee. I have had two chairmen resign in something of a sense of frustration because they could not identify the specific function of the committee. In our case this problem may be compounded by the fact that we have a large number of council-appointed boards and commissions which involve themselves in almost every aspect of community effort.

IV. WHAT PROBLEMS DO YOU ENCOUNTER IN FUNDING PROGRAMS? HAVE YOU HAD PROBLEMS IN ARRANGING THE LOCAL SHARE OF GRAND-IN-AID PROGRAMS WITHOUT COMPLETE KNOWLEDGE OF THE STATUS OF YOUR PROPOSAL?

In many instances, dependence upon federal funds makes it very difficult, if not impossible, to effect long-range financial planning due to (1) delay in determination of status of federal grant applications, (2) uncertainty of future federal appropriations for certain municipal programs, and (3) lack of long-range federal appropriations for municipal programs. I realize that certain of these problems are beyond administrative control, both at the federal and local level, due to political considerations in the Congress. Nevertheless, this inability to effect adequate financial planning is a drawback.

The interests of our city would be better served by a prompt answer, even a prompt "no" or a definite "yes, in eight months," if that is the answer.

We have experienced HUD officials at the regional levels setting their own guidelines and pushing their own philosophy, thus requiring Washington contacts in order to shake loose a program for funding. This latter situation has been experienced by many cities in our region and results from the actions of one individual. A bill of particulars signed by representatives of all state leagues apparently did not reach Washington or result in any change in attitude by the regional official.

It would be helpful if routine reports on the status of applications could be received. A simple postcard report which would check just a few blanks indicating the stage of processing of applications would be most helpful. These reports should be sent out on all pending matters periodically--monthly or bi-monthly.

You will, I am sure, repeatedly be hearing specific objections to procedure. Everything must be in 16 copies, each individually signed. It takes forever to get an answer, and "yes" takes twice as long as "no"; "maybe" takes longest of all. Forms are unreasonably complicated, and half the required information is not applicable. If council action is normally taken by resolution, the federal requirement is an ordinance, and vice versa. The time necessary to process an application may be so long as to destroy local momentum and support.

I have personally found it necessary about as often as not to bypass the regional office and contact Washington directly. I am certainly aware that this is bad policy, but it is generally effective, both in obtaining an early answer and a favorable one. I am not at all sure that the results derive from a better

understanding in Washington; it is far more likely to be a matter of arbitrary Congressional pressure. It would clearly be advisable to provide for equitable consideration at the regional level to forestall at least those cases wherein we resort to Washington in frustration or simple exhaustion.

The "review process" of the federal government requires a time roughly equivalent to the actual construction of a project. With respect to funding, one of the principal inequities which we have encountered in these programs is the fact that the sponsor, or city, must give ironclad guarantees that it will prosecute and complete the project, subject to any changes which the FAA may make along the way. There is no corresponding guarantee that the federal government will participate in all the costs which may be involved in additional work. The FAA is prone to unilateral and retroactive amendments to grant agreements. The city then has a choice of agreeing to the amendment or having all funds withdrawn.

We are not able to receive positive information of the disposition of applications in time to meet municipal budget schedules and considerable havoc has resulted in the local government budgeting and legislative processes. In desperate attempts to meet these schedules, governing bodies seemed disposed to agree to almost anything so that local democracy becomes somewhat of a sham in pursuit of the federal buck. . . . There are certainly far too many layers of review and they are too far removed. The net results of some of the prolonged review processes have been some devastating delays in our cases resulting in some neighborhood deterioration in a federally required suspension of needed city inspectional activities, in political unrest, in declining community participation, and in substantially increased project costs, which need not have been incurred if it were possible to promptly process this material.

When federal funds are supplementary to local funds, and at least part of a project would be feasible without federal participation, some procedures to permit the city to go ahead with the project would be helpful.

One of the greatest improvements that could be made in this matter (funding) would be the adoption of a schedule whereby the cities would know one way or the other whether or not a program was going to be funded in a certain year by a certain deadline. Without question, I feel that a "no answer" to funding a particular program in a particular year will be better than waiting several months, and sometimes even a year, to find out anything about the project.

The federal government should at least advise the cities of the status of available funding at the time the grant application is submitted.

V. ONCE A PROPOSAL HAS BEEN APPROVED, WHAT DIFFICULTIES DO YOU ENCOUNTER IN ADMINISTRATION, RECORD-KEEPING, AUDITING, etc.?

One of the major difficulties that we have experienced with the administration of federal programs is the seeming incompatibility between local pay scales and the federal wage standard. For example, a large portion of our urban beautification program called for the removal of 4000 tree stumps on city streets with subsequent replacement by new plantings. Contracts were prepared and bids obtained for the removal of these trees. Federal wage schedules were attached to the contract in conformance with federal regulations. The wage standards for tree trimmers and removers were far in excess of wages being paid in the area. The federal standard listed \$3.67 per hour as the established rate. The highest rate offered by the Davey Tree Expert Company was \$2.85 per hour. The Davey Tree Expert Company's wage schedule was established by an agreement between Local Union 245 of the International Brotherhood of Electrical Workers, AFL-CIO. They are the highest wages being paid in the area. We appealed to HUD requesting permission to award the contract at these local prices. The appeal was sent to the Department of Labor in Washington, D. C. and was subsequently refused. A new appeal is being prepared by the city. If this too is refused, the city will have to withdraw the project from the program. Local contractors would be unable to pay these higher wages to their men for only one or two contracts and then drop them to the lower pay scale without creating a great deal of dissension. In the meantime, 4000 new tree replacements were purchased. The city was forced to plant them in other locations since the trees had not been removed. If federal aid is received for removal, we will have to purchase an additional 4000 trees to complete our program.

Another item of administration that has caused some difficulty is the necessity for concurrence from the regional office in the award of contracts. Oftentimes letters requesting concurrence are not answered for five or six weeks. This often delays contracts to the point that work is uncompleted during a given construction season, thus requiring the city to ask for an extension.

No serious problems have been encountered thus far in record-keeping and auditing. It would be helpful to have more uniformity in accounting requirements among the various programs, but this isn't possible because of the great differences in the types of projects for which grants are available. A somewhat more serious problem is encountered in the federal requirements for bidding and construction contract documents. All of the programs include requirements (wage and hour, equal employment, anti-kickback, non-discrimination, etc.) from the same federal laws, but the requirements are handled quite differently by each federal agency. It would be helpful for a uniform set of requirements to be developed that would be applicable to all federal programs, perhaps by Executive Order.

The major difficulties in accounting problems between the local and federal governments is the lack of integration in accounting systems. At the present time the workload burden is placed on the local units because it is their responsibility to adjust their accounts to the federal system. For example, the various urban renewal projects are not kept on a fiscal-year basis, but are rather project-oriented on a cumulative basis. This results in the local units of government keeping two sets of accounting records.

The federal government could assist itself in its program or project auditing procedures if, prior to project commencement, the localities would receive a checklist of what data should be retained for the audit and for how long it should be retained. The Federal Highway Program, in particular, has a delay of some three to five years from the completion of the project to the beginning of the project audit. The auditing procedure would be additionally simplified if the federal government were to make greater use of the standard classification of municipal accounts in the preparation of auditing forms and procedures.

On some of the programs where the federal government reimburses the city for the federal participation in the program after the expenditures have been made, we have experienced some rather long delays in receiving reimbursement after the projects have been audited and approved. This is particularly true in the anti-pollution programs and the BOR projects. Here again, specific information on the timing of these reimbursements, regardless of the length of time involved, would be helpful.

There are a few general areas in which the paperwork seems to us to be unnecessarily long. We have found the FHA processing to be slow and very painful; particularly, the processes involved related to financing loans for rehabilitation have caused very considerable delays in our rehabilitation programs elsewhere. Also in connection with rehabilitation, we find it very difficult to secure bidding contractors for the work because of the huge amounts of paperwork and specifications involved in letting such contracts.

Our record-keeping has been complicated by a lack of uniformity in federal requirements as between agencies. We have also noted a lack of any standard form to be used in submitting claims for reimbursements where subcontractors are involved as third parties in programs where the city is the prime contractor. Our audits of the records of various contractors participating with the city have revealed a lack of standardization in several areas, as follows:

travel expense; sick leave and vacation pay; termination pay; hospitalization; employer contributions to private retirement systems. We also feel we have been somewhat hampered by the lack of federal audits to review local agencies' accounting procedures during initial periods of program operation. This has resulted in a non-disclosure of discrepancies and irregularities which might have been corrected early in the program. Lastly, we have also suffered from a lack of sufficient detail in the original approved budget and any revisions thereof to determine what is allowed, increased, or decreased for both reimbursable expenditures and non-reimbursable contributions.

We would urge that the federal agency should either specify clearly the record-keeping and accounting objectives and leave the details to the local agencies, or should establish a detailed chart of accounts and accounting system and provide that the cost of maintaining this accounting system be included within the total project cost. At the present time, all the record-keeping and auditing are extremely detailed; the procedures seem to be working out reasonably well.

Federal and state agencies, fearful of GAO auditors, tend to overprotect the federal interest. The local government administrator has little flexibility or latitude in decision-making; he is unable to exercise responsible judgment. The program may suffer but a carefully documented audit trail will endure.

VI. ARE THERE SERIOUS INCOMPATIBILITIES AMONG PROGRAMS AIMED AT INDIVIDUAL PROBLEMS? IS THERE A PROLIFERATION OF ADMINISTRATIVE UNITS AT THE LOCAL LEVEL WHICH CAN BE AVOIDED BY PROGRAM PLACEMENT IN EXISTING UNITS OF GENERAL LOCAL GOVERNMENT? OR DO YOU PREFER THE CREATION OF SPECIAL DISTRICTS FOR SPECIAL PROBLEMS? WHAT DIFFICULTIES, IF ANY, ARE CAUSED BY THE NEED FOR DIFFERENT "COMPREHENSIVE" PLANS FOR EACH PROGRAM?

If the local plans were truly comprehensive, and if planning were sufficiently flexible to keep these plans updated, then comprehensive plans could be built up from the local to metropolitan, regional, and higher levels, consistent with the emergence of new programs. In my opinion, the comprehensive highway plan is not at all the same as the highway portion of comprehensive development plan. One may consider, comprehensively, highway needs, or recreation needs, or airport needs, without giving proper study to the relations between them, or to other aspects of the community in which we live. To me, there would be merit in coordinating plan requirements of the various programs, if only to clarify terminology.

Within HUD we have had a number of problems in working out programs involving more than one of the subagencies. The Public Housing Assistance Administration and the Renewal Assistance Administration do not coordinate their requirements well. In other cases, we have found that FHA has worked at cross purposes with the Renewal Assistance Administration. In the past few months there has been a little more communication between these federal agencies but little that could as yet be called coordination.

We believe there has been improvement in the communication and coordination which must take place between officials responsible for federal programs both at the regional and Washington offices. For example, the growth and reorganization of various federal departments, as evidenced by the creation of two new Cabinet posts, that is, Housing and Urban Development and the Department of Transportation, it is inevitable that there will be duplication but regrouping of functions and liaison seem to be greatly improved since the creation of these two new Departments. We have been impressed with the efforts made recently, particularly in the Department of HUD, to work closely with the Department of HEW and the Office of Economic Opportunity.

A greater simplification would seem to be possible in the requirements by different federal agencies for local documentation in support of applications.

Perhaps more comprehensive "workable program" should be permitted to substitute. Under this procedure, a community which had a "workable program" approved by the various federal agencies concerned would need only cite that program plus submit additional information as required by the specific program. This of course would require greater communication and coordination between federal agencies than exists at present.

In the rural areas of Missouri there have been a great proliferation of water districts quite apart from the local general governments; these have worked greatly to the disadvantage of cities. They in effect have prevented expansion of city boundaries and have recruited city personnel away because of their ability to pay higher salaries than existing local governments.

We have found recently that several federal programs do not provide the same relocation requirements for benefits that are found in the urban renewal relocation procedures. The inconsistency is that a federal interstate highway is built within a block of an urban renewal project and requires the relocation of families and businesses, these families and businesses relocated by the highway program would receive less attention and fewer funds for the move than would a similar individual or a business a block away in an urban renewal project. Consistency and uniformity of programs is desirable and necessary to keep public respect and confidence.

In some way a coordinated requirement for comprehensive planning in all its facets must be developed, so that comprehensive planning does not become merely for purposes of federal aid. A series of small unrelated "comprehensive plans" which pertain only to a single aspect of community development, e.g., beautification. In developing plans of a true comprehensive nature, the varying requirements in federal programs, seems to be working directly against this objective. The comprehensive planning activities of a city or applying agency should be demonstrated, but only once. Any subsequent applications for which the city must have these requirements, should refer to whatever agencies are entrusted with the responsibility for keeping such evidence or which attests to the planning program in the city. It should not have to be duplicated for each involved federal agency.

Wherever possible, it is highly desirable that federal programs be placed in existing units of general local government, rather than requiring the creation of special districts or special-purpose, semi-autonomous agencies. Also, there should be no incentive for the creation of special districts or agencies by the use of federal funds since this weakens the structure and capability of the general purpose of the governmental units which are currently in existence.



I think the requirement for the creation of special districts to handle special problems such as urban renewal and housing is absolutely wrong. I feel that this ought to be the option of the local unit of government. Why should a special authority be set up twice or three times removed from the democratic processes of elections and handle a multi-million-dollar program in the city? Perhaps, there is a case for diversifying some of the responsibilities in the larger cities, but again this should be at the option of the local governing body elected by the people.

The entire relationship between the federal government and local government should be and could be improved, and I believe the effectuation of this improvement lies primarily in improving communication between these two levels of government. To improve this communication, it would be advantageous to involve federal officials from the departments concerned with municipal problems, on a person-to-person basis in planning federally funded local programs. This person-to-person communication might be implemented by having a federal office at the local level, especially in cities of 150,000 or more population. The personnel in these offices could provide liaison, aid local governments in planning federal applications, and recommend approval of particular project plans when it is determined such plans have met federal requirements. This arrangement would be particularly effective if the personnel of the federal local office were to be paid partially by the federal government and partially by the local government. For instance, the federal government might pay three-fourths of the cost of maintaining such an office, while local governments might pay one-fourth. The personnel staffing these offices would then have a vested interest in both levels of government and would hopefully contribute to better communication, thereby contributing to improved administrative procedures in the federal-local relationship.

VII. SOME PEOPLE HAVE EXPRESSED CONCERN THAT MANY FEDERAL GRANT PROGRAMS ARE TOO NARROW IN SCOPE, ESPECIALLY WITH REGARD TO FORMULAS AND MATCHING REQUIREMENTS, etc. DO YOU FIND YOURSELF TAILORING YOUR LOCAL PROGRAMS TO MEET GRANT REQUIREMENTS RATHER THAN MEETING PARTICULAR LOCAL NEEDS?

Cities, and especially "poor cities," have many needs, few of which are eligible for assistance under existing federal programs, even when they are adequately funded. The result in many cities is undue emphasis on programs and projects which are federally assisted at the expense of others. We have been able to avoid this pitfall simply by applying for grants to construct projects for which we have adequate funds to construct without federal assistance. The practical effect of a grant approval is to release funds for other needed projects that were not eligible for federal assistance. A more reasonable program of federal assistance would provide grants that would assist cities with an entire program rather than a specific project. This would substantially improve application submission and review procedures; more importantly, it would help cities in the areas that they feel are most in need of help.

It is encouraging to note that the present piecemeal approach to urban renewal and urban redevelopment has been partially repudiated by HUD itself, in the development of the new Demonstration Cities model neighborhood program as an instrument of greater flexibility and scope, embracing many programs with emphasis on innovation and experimentation.

It is true that many grant programs are too narrow in scope, especially with regard to formulas and matching requirements, but the problem stems more from the fact that cities are stimulated into action by broad programs only to find that the federal funding is not adequate to meet the accumulated problems of the cities and towns. The formulas and matching requirements are only secondary. The over-all funding or lack of it is the primary problem. We do find ourselves tailoring our local programs to meet available funding rather than meeting particular local needs.

One of the major problems we have encountered in dealing with the federal aid to airports program is the fact that funds are allocated on a fiscal-year to fiscal-year basis. This makes it difficult to coordinate programs which are of such a scope that they will encompass a program of two or more fiscal years. This makes it especially difficult to proceed with the long-range, rational and planned construction program in which each succeeding project may depend upon completion of the preceding work.

It would be helpful if federal grant programs were more directly geared to particular community activities, rather than to projects. Communities should be required to account for the overall objectives to which it intends to devote federal funds but should not have to box itself in with as detailed proposals as now are required. Communities with a good history of participation in federal-local programs should be permitted more latitude in the handling of federal grant funds.

Many federal grant programs are designed to "stimulate" local activities in certain areas (the "carrot theory"). An adverse effect of this is to overemphasize programs for which grants are available at the expense of programs which must be locally financed. Because of the fear of not receiving full advantage of federal funds, low priority programs are initiated; the impact on local financing occurs after the short-term federal grant is ended. The goal often appears to be the grant rather than the activity.

Generally, the city has not found itself tailoring local programs to meet federal requirements rather than to particular local needs. Many federal programs have had to be passed by, however, because they are not flexible enough to fit the city's needs, or because they include requirements not suitable to the city's needs and desires. It should be recognized that the federal programs often stimulate problem-solving in areas that otherwise would be neglected. For instance, as a result of the concentrated code enforcement problem, substantial amounts of local money are being spent in several neighborhood improvement areas for streets, water and sewer mains, and storm drainage. These needs existed for many years, and the available federal funds made it possible to stretch local dollars to get the job done.

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