

DOCUMENT RESUME

00435 - [A1051858]

Federally Assisted Areawide Planning: Need To Simplify Policies and Practices. GGD-77-24; B-146285. March 28, 1977. 79 pp.

Report to the Congress; by Elmer B. Staats, Comptroller General.

Issue Area: Intergovernmental Relations and Revenue Sharing: Federal, State, Area-wide, and Local Coordination (402).

Contact: General Government Div.

Budget Function: General Government: Executive Director and Management (802).

Organization Concerned: Office of Management and Budget.

Congressional Relevance: Congress.

Authority: Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231). Demonstration Cities and Metropolitan Development Act of 1966 (42 U.S.C. 3334). OMB Circular A-95. OMB Circular A-82.

The Intergovernmental Cooperation Act of 1968 recognized the interrelated nature of most Federal planning programs and the need to coordinate them. Twenty federally assisted areawide planning programs, principally in the districts surrounding Sacramento, California, Atlanta, Georgia, and Seattle, Washington, were reviewed to determine whether the procedures of Circular A-95 of the Office of Management and Budget (OMB) adequately carry out the purposes of the Intergovernmental Cooperation Act of 1968.

Findings/Conclusions: OMB's encouragement of the use of a single areawide organization to plan or to coordinate planning has not been effective because: (1) programs were initiated haphazardly to satisfy particular demands and each program built its own constituency at the State, areawide, and local level, which made it difficult for State and local governments to form a coordinated planning effort; (2) Federal agencies often ignored the designated comprehensive planning agency; (3) the States sometimes disregarded their own planning subdivisions in implementing Federal programs; and (4) Federal agencies had varying requirements which created impediments to coordinated planning and made it difficult for one planning organization to satisfy all Federal requirements. Recommendations: Congress should establish a national policy on areawide planning and provide a basis for strengthening planning focal points at the areawide level. OMB should: require Federal agencies and federally funded state agencies to use the designated areawide comprehensive planning agencies to carry out and coordinate areawide planning, and to use, to the extent possible, the planning boundaries designated by the States. (SS)

00435

REPORT TO THE CONGRESS



BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

Federally Assisted Areawide Planning: Need To Simplify Policies And Practices

Office of Management and Budget
and Other Federal Agencies

This report identifies problems encountered by State and local governments and organizations involved in coordinating and integrating a myriad of federally assisted areawide planning programs.

GAO recommends that the Congress reduce the number of planning programs and establish a national policy on areawide planning.

Recommendations are also made for improving Office of Management and Budget's circular dealing with areawide planning.



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-146285

To the President of the Senate and the
Speaker of the House of Representatives

This is our report assessing the coordination of federally assisted areawide planning activities by State and local governments and other organizations. Planning coordination is required by section 401(e) of the Intergovernmental Cooperation Act of 1968. Office of Management and Budget Circular A-95 implements section 401(e).

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of the report to the Director, Office of Management and Budget; and to the heads of the departments and agencies to which the circular applies.


Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

FEDERALLY ASSISTED AREAWIDE
PLANNING: NEED TO SIMPLIFY
POLICIES AND PRACTICES
Office of Management and Budget
and Other Federal Agencies

D I G E S T

To promote the efficient use of billions of dollars for Federal programs--developing highways, constructing community facilities, conserving natural resources, educating children, cleaning the air, purifying water, etc.--the Federal Government requires State and local governments and other organizations to prepare plans. These plans range from architectural designs to development of geographic areas.

This report concerns federally assisted planning for development needs of geographic areas that involve more than one local government. This is commonly called areawide planning and takes two forms.

--Functional planning focuses on a program, subject matter, or functional area, such as planning for the transportation or health needs of people or environmental protection in a given geographic area.

--Comprehensive, developmental, or integrated planning focuses on a geographic area, be it a community, several communities, or a State, with the purpose of combining the objectives of the various functional programs into a single planned approach for meeting future needs of the geographic area.

GAO's review included an examination of the Intergovernmental Cooperation Act of 1968 (title IV) and Circular A-95 of the Office of Management and Budget to determine whether the procedures and processes of Circular A-95 adequately carried out the purposes of the act.

GAO reviewed 20 federally assisted planning programs principally in the districts surrounding Sacramento, California; Atlanta, Georgia; and Seattle, Washington. (See maps on pp. 3, 4, and 5.)

In each of these districts, GAO

- inventoried all current federally assisted planning,
- identified all sub-State organizations engaged in planning, and
- analyzed functional and geographic overlap and the extent of planning coordination.

Problems exist in these areas. GAO identified the impact of these problems and the efforts being made to correct them.

The Office of Management and Budget (OMB) has encouraged the use of a single areawide organization to plan or to coordinate planning. However, this idea has not been effective chiefly because:

- Programs were initiated haphazardly over a period of years to satisfy particular needs or demands, not by an interrelated system or approach. Each program built its own constituency at the State, areawide, or local level, which made it difficult for State and local governments to mesh the programs into a coordinated planning effort.
- Federal agencies often ignored the designated comprehensive planning agency; instead, they set up separate planning groups for different geographical areas. OMB's instructions were partly at fault because they encouraged rather than required the agencies to work through the designated areawide planning agency.
- The States sometimes disregarded their own planning subdivisions in implementing Federal programs.
- Federal agencies had varying requirements which created impediments to coordinated planning and made it difficult for one planning organization to satisfy all Federal requirements.

To correct these problems GAO recommends that the Congress establish a national policy on areawide planning and provide a basis for strengthening planning focal points at the areawide level.

GAO also recommends that OMB:

- Require Federal agencies and federally funded State agencies to use the designated areawide comprehensive planning agencies to carry out and coordinate areawide planning, and to use, to the extent possible, the planning boundaries designated by the States.
- Require that Federal planning assistance recipients coordinate their planning activities with designated planning organizations and with other organizations doing similar planning.
- Continue its efforts to remove varying administrative and legislative planning requirements that impede coordination and integration of planning activities carried out by State and local governments.
- Develop planning principles and require that they be used in federally assisted planning programs.

These improvements are essential if the present fragmented Federal approach to planning assistance is continued. Planning would be considerably better if the number of federally assisted planning programs was reduced. This would require legislation.

OMB solicited the views of Federal agencies, State and local governments, and public interest groups on this report and provided a consolidated response. (See app. I.) Interest in the report was keen and the respondents generally were supportive of the study and its recommendations. OMB agreed to study the recommendations, particularly as they relate to part IV of its Circular A-95.

OMB noted that planning and the Federal role were extremely complex subjects and offered some observations which GAO agrees need to

be considered by OMB and the Congress in identifying needed legislative and administrative changes.

In summary, OMB's response was that:

- It has not taken a position on the proposed legislation for a national policy on areawide planning, although the majority of respondents supported it.
- Consolidating related implementation programs for which planning is undertaken may be a better approach than consolidating planning programs.
- It can require use of designated planning organizations and will consider this option.
- Present methods for requiring planning coordination need to be restudied.
- Development of planning principles may be worthwhile.

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ABBREVIATIONS

EDA Economic Development Administration
GAO General Accounting Office
HEW Department of Health, Education, and Welfare
IGA Integrated Grant Administration
OMB Office of Management and Budget

CHAPTER 1

INTRODUCTION

To promote the efficient use of billions of dollars for Federal domestic programs--developing highways, constructing community facilities, conserving natural resources, educating children, cleaning the air, purifying water, etc.--the Federal Government requires State and local governments and other organizations to prepare plans. Plans can range from the architectural design of a building complex to the anticipated development of a geographic area.

This report concerns federally assisted planning for the development needs of a geographic area that involves more than one general local government. It is commonly called areawide, sub-State, or multijurisdictional planning.

Federally assisted planning takes two forms:

- Functional planning focuses on a program, subject matter, or functional area, such as planning for the transportation or health needs of people or environmental protection in a given geographic area.
- Comprehensive, developmental, or integrated planning focuses on a geographic area, whether it is a community, several communities, or a State, to combine the needs of the various functions into a single, planned approach for meeting future needs of the geographic area.

Between 24 and 48 Federal programs provide funds to State and local governments and other organizations for planning. Most programs support functional planning and usually cover an area involving more than one general local government. The programs were initiated over several years without effective mechanisms to interrelate them to promote the broader objective of geographic developmental planning. Estimates of Federal funding in fiscal year 1975 ranged from \$350 million to \$560 million.

Some Federal planning programs we reviewed, although in appearance single-function, are actually multifunction. Planning for the aged, for example, requires considering their needs in such areas as health, education, transportation, housing, and recreation. Planning to improve or protect water quality requires considering land use, transportation, air quality, economic development, health, and recreation planning.

The Intergovernmental Cooperation Act of 1968 recognized the single purpose but interrelated nature of most Federal planning programs and the need to coordinate them. Section 401(e) of the act requires that:

"Insofar as possible, systematic planning required by individual Federal programs (such as highway construction, urban renewal, and open space) shall be coordinated with and, to the extent authorized by law, made part of comprehensive local and area-wide development planning."

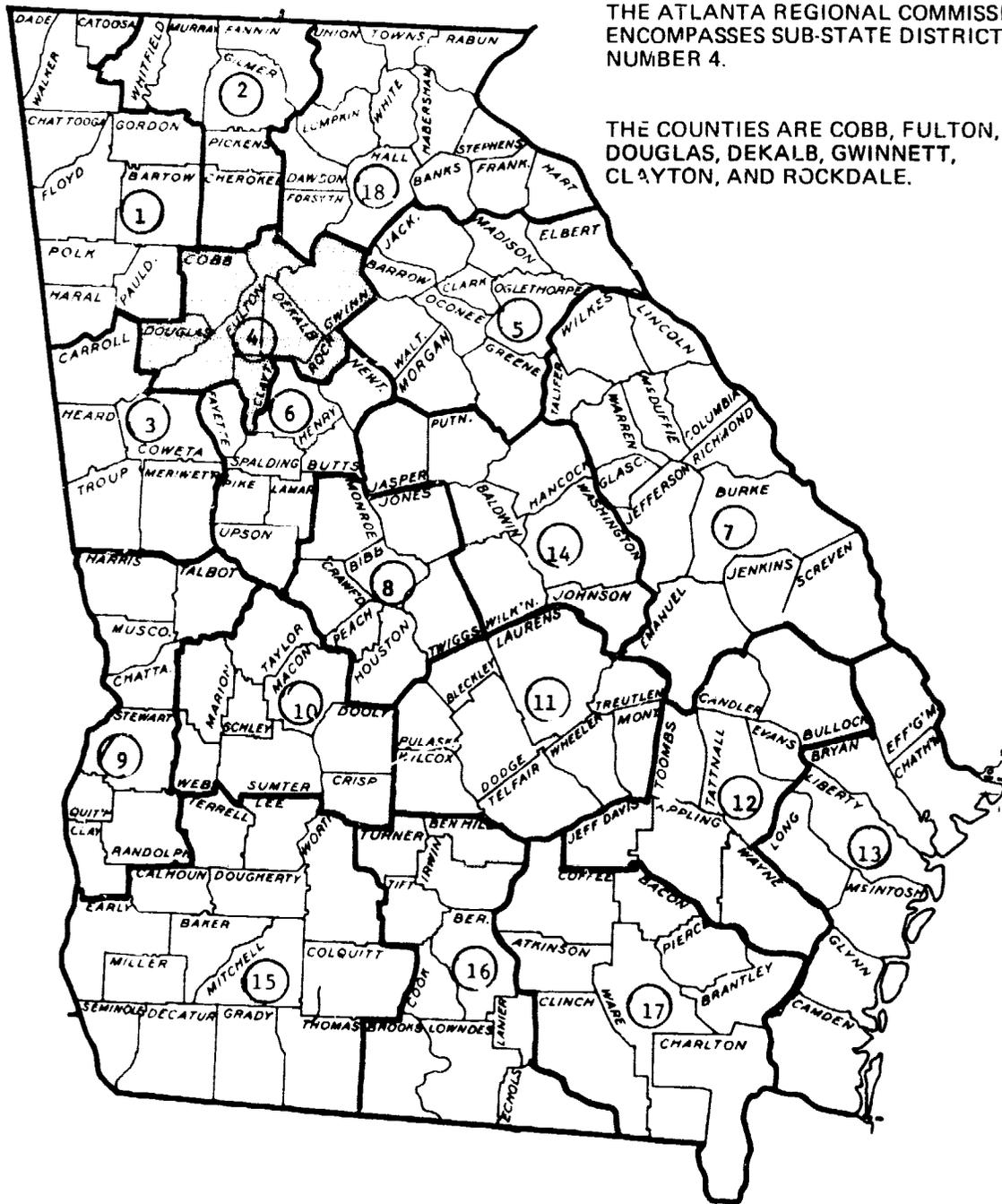
The Office of Management and Budget (OMB) Circular A-95, part IV, seeks to implement section 401(e).

To determine the extent the act and circular were adhered to, we reviewed planning activities in 3 sub-State planning and development districts under 20 Federal planning programs administered by 9 Federal departments and agencies. The districts were the eight-county area surrounding Sacramento, California; the seven-county area surrounding Atlanta, Georgia; and the four-county area surrounding Seattle, Washington. These three areas do not extend beyond State boundaries and, therefore, any problems involving coordination of interstate planning are not discussed in this report.

Ideally, planning is a basis for Federal, State, and local governments' decisions in authorizing vast amounts of funds to implement the plans and accomplish Federal domestic objectives. However, Federal, State, and local officials told us that few linkages exist between developmental planning and implementation of federally assisted programs. We recognized this problem during our review, but concentrated on potential improvements in the areawide planning process as a necessary first step to improve the ties between program planning and implementation.

District boundary maps existing during our review are on the next pages. Descriptions of the 20 planning programs included in our review are in appendix II and the scope of our review is discussed in chapter 6.

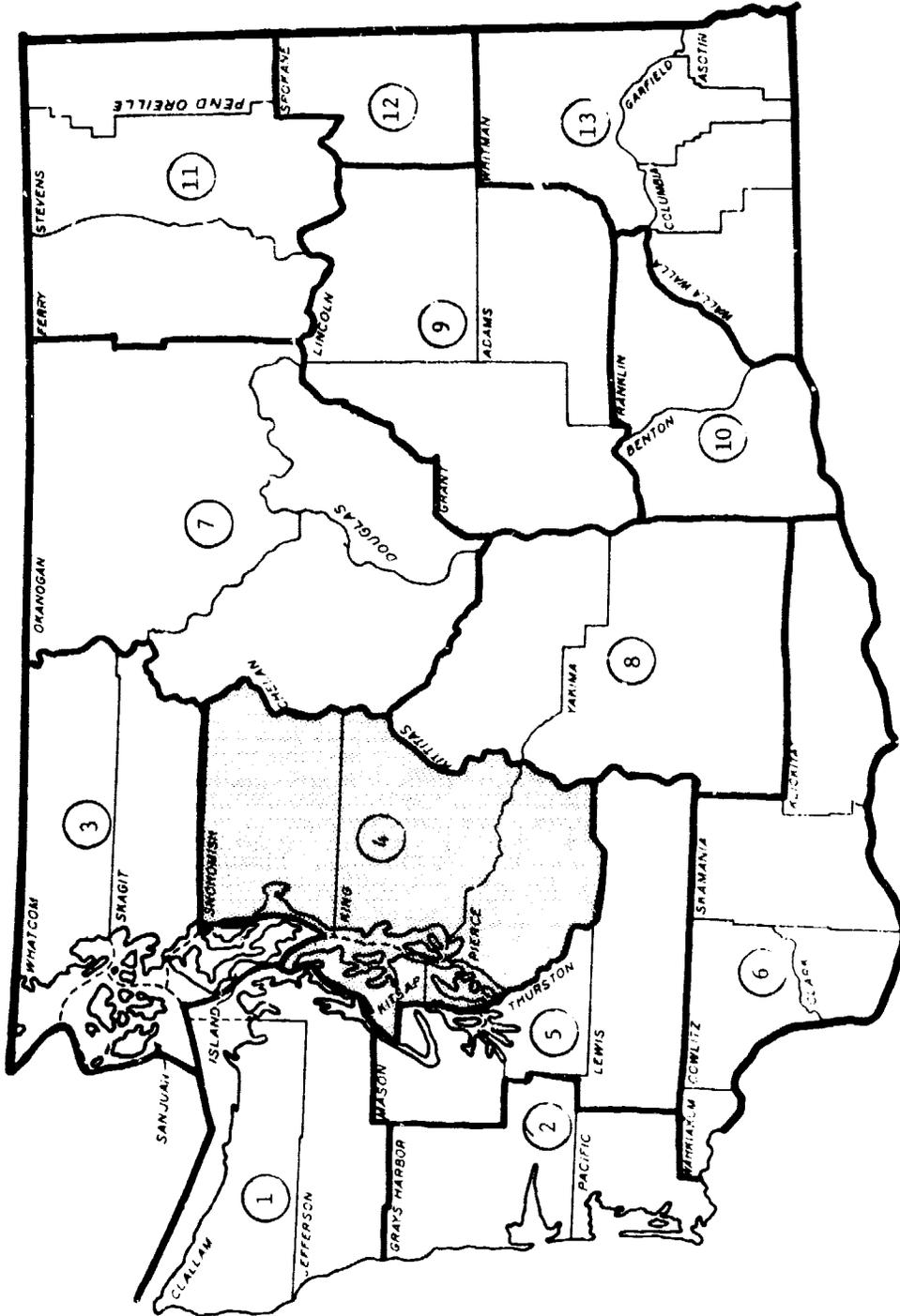
GEORGIA
SUB-STATE PLANNING AND DEVELOPMENT DISTRICTS



THE ATLANTA REGIONAL COMMISSION ENCOMPASSES SUB-STATE DISTRICT NUMBER 4.

THE COUNTIES ARE COBB, FULTON, DOUGLAS, DEKALB, GWINNETT, CLAYTON, AND ROCKDALE.

WASHINGTON
SUB-STATE PLANNING AND DEVELOPMENT DISTRICTS



THE PUGET SOUND COUNCIL OF GOVERNMENTS ENCOMPASSES SUB-STATE DISTRICT NUMBER 4. THE COUNTIES ARE SNOHOMISH, KING, PIERCE, AND KITSAP.

CHAPTER 2

FEDERAL PLANNING PROGRAMS AND EFFORTS TO COORDINATE THEM

The Federal Government has concluded over the past several decades that promoting efficient use of Federal funds for domestic purposes, such as stimulation of employment and economic development, could be greatly enhanced if recipients had plans which logically outlined the projects required for sound community development. Toward this end, the Federal Government has established specific programs for sharing the costs incurred by State and local governments and other organizations in carrying out such planning.

Needed governmental services or particular problems often overlap the jurisdictional lines of general purpose local governments. Transportation, sewage, and pollution abatement are examples of functions which often cannot be satisfactorily addressed within the confines of a single jurisdiction. Therefore, various federally assisted planning programs encourage areawide approaches to solve these areawide problems.

HISTORY OF PLAN REQUIREMENTS

Planning for the use of Federal funds became a concern to the Federal Government in the 1930s, when it provided large amounts of money to State and local governments for relief from depressed economic conditions. In 1933, through the initiative of and incentives provided by the Federal Government, the States established planning boards to assist Federal officials in developing a broad, long-range national public works program to cope with the Depression. Federal assistance to the State planning boards consisted of manpower provided by the various Federal public works agencies and Federal funds to hire consultants. Most importantly, the Federal Government required that all federally funded public works projects be cleared by a State planning agency.

As public works expenditures decreased in the late 1930s national and State planning efforts waned. At the same time, however, State agencies encouraged the growth of municipal and county planning.

Federal interest in planning, particularly for housing, reemerged late in the 1940s and early in the 1950s. The National Housing Act of 1949 provided Federal funds for public housing and redevelopment and reaffirmed the principle that federally assisted urban development should conform to community development plans. The National Housing Act of 1954

required grant applicants to complete a comprehensive community plan and workable program for implementing federally funded urban projects. Section 701 of the act provided funds to States, regional planning agencies, and certain communities to prepare comprehensive plans.

Since the 1950s the number of Federal assistance programs for State and local governments has greatly increased. Often the programs required that federally assisted projects conform to a local or State comprehensive or functional plan. The programs set aside funds specifically for planning costs, usually addressing a single function, and often specifying planning for a multijurisdictional area with established boundaries. New federally sponsored regional organizations were created to plan within the functional and geographic program areas.

A 1969 Federal Interagency Task Force on Planning Assistance studied 36 federally assisted planning programs. Many programs supported areawide planning activities. The Task Force recounted the growth of the programs as follows.

--Nine programs existed in 1964.

--Nine new programs were established in 1965 to help State and local governments plan facilities for higher education and outdoor recreation, and for health, transportation, and other functions.

--Seventeen programs were added since 1965.

--New programs were being considered by the Congress for primary and secondary education, airport development, and other functions, and for governmental management and coordination.

The Advisory Commission on Intergovernmental Relations reported in 1973 that more than 4,000 multijurisdictional program areas had been created by the 24 Federal programs the Commission identified as assisting in areawide planning. The most common geographic program areas included 247 air quality regions, 481 law enforcement planning regions, 198 comprehensive areawide health planning regions, 124 economic development planning districts, and 501 manpower planning areas. OMB estimated in 1974 that 2,000 areawide agencies received Federal planning assistance. A 1975 study prepared by the city of Seattle, Washington, reported that any metropolitan area might have as many as 20 federally sponsored bodies planning on a multijurisdictional basis.

The growth in Federal programs and associated organizations has produced immense coordination problems at all levels of government.

EFFORTS TO COORDINATE PLANNING

The growing number of federally supported organizations planning on an areawide basis was discussed in 1966 by the National Governors' Conference. Concerns were expressed that the Federal planning assistance programs were uncoordinated and that planning boundaries overlapped. Representatives of predominantly rural States claimed they were particularly hard hit because of the strain placed on their manpower and financial resources. The Governors decided to present the issue to the Administration for a solution.

The Administration's position was that coordination must occur at the Federal level to prevent conflict and duplication among federally assisted planning efforts, and that procedures should be established to encourage and facilitate planning coordination. OMB (then called the Bureau of the Budget) was directed to study the problem and to develop guidelines for solving it.

OMB Circular A-80

On January 31, 1967, OMB issued Circular A-80 to improve coordination of federally assisted development planning covering multijurisdictional areas. The circular described in detail policies, objectives, and procedures for Federal agencies, State governments, and applicants seeking planning assistance.

The circular had two objectives: to encourage (1) State and local development planning agencies to use common or consistent data bases and share facilities and resources and (2) the States to establish planning and development districts and called for Federal agencies to use the district boundaries when assisting planning, unless clear justification existed for not doing so.

To accomplish the first objective, Federal agencies were to establish procedures requiring applicants seeking planning assistance to (1) identify related planning activities within the planning district, (2) show evidence of cooperation and coordination with the other planning activities, (3) develop organizational and procedural arrangements for coordinating planning, and (4) use common or consistent data bases and share planning facilities and resources.

To accomplish the second objective and to improve the delivery of planning assistance, Federal agencies were to:

- Provide the Governor a 30-day review and comment period on proposed boundary designations; or where State planning and development districts were not established, consult with units of general local government on proposed boundary designations and provide other Federal agencies administering related programs a 15-day review and comment period on proposed designations.
- Minimize inconsistencies among Federal administrative and approval requirements.
- Provide for joint funding of planning programs when the quality, scope, and coordination of planning in multijurisdictional areas would be enhanced.
- Review existing planning districts of these programs for consistency with the above.

OMB Circular A-82

On April 11, 1967, OMB issued Circular A-82 to implement section 204, title II, of the Demonstration Cities and Metropolitan Development Act of 1966 (42 U.S.C. 3334). Section 204 required that all applications requesting Federal assistance for planning or constructing public works projects in a metropolitan area be submitted to an areawide agency, which was designated to perform areawide planning, and was composed of or responsible to, to the greatest extent possible, locally elected officials. The areawide planning agency was to review the proposed project and comment on its consistency with area and local comprehensive planning.

Section 204 encouraged the development of multipurpose areawide groups, such as associations of governments or comprehensive metropolitan planning agencies, to coordinate federally assisted development affecting more than one jurisdiction. In metropolitan areas lacking such organizations, Governors were to designate an organization having competence in comprehensive planning to perform such functions until the local governments could develop their own organizations.

OMB Circular A-95

Title IV of the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231) established a national policy of intergovernmental coordination and cooperation. The act's objectives are derived from the premise that the economic and social development of the Nation and satisfactory living depend on the sound and orderly development of all areas, both urban and rural. The act required the President to es-

establish rules and regulations for uniform application in formulating, evaluating, and reviewing Federal programs and projects to assure orderly development. In accordance with the act, Circular A-95 was prepared and issued in July 1969. The circular incorporated and broadened Circulars A-80 and A-82.

The Intergovernmental Cooperation Act and Circular A-95 expanded the Demonstration Cities Act's concepts of coordinated planning and reviewing to nonmetropolitan areas. As a result, the number of multipurpose areawide agencies designated to perform comprehensive planning in multijurisdictional areas increased. With advice from local governments, the States increased their efforts to establish, at the sub-State level, planning and development districts to coincide with the geographic planning boundaries of areawide agencies.

In its 1974 Report on National Growth and Development, the Domestic Council stated:

"* * * ten years ago, there were 25 councils of government, * * *. Only a few States had sub-state general purpose districting systems. But, by the end of 1973, there were over 600 councils of governments, forty-four States had delineated substate districting systems, with a total of 488 districts * * *."

Districts in about half of the States were created by legislation and the remainder by gubernatorial action.

The purpose of Circular A-95 was to foster intergovernmental cooperation by enabling State and local governments to comment on the consistency of proposed Federal and federally assisted projects with State, regional, and local policies, plans, and programs. The circular has four parts.

--Part I deals with State and local governments' review of applications for Federal assistance.

--Part II requires consultation by Federal agencies with State and local governments on Federal development projects.

--Part III provides for gubernatorial review of federally required State functional plans before submission of those plans to Federal funding agencies.

--Part IV provides for coordination of federally assisted planning programs at areawide levels.

Part IV of the circular implemented section 401(e) of the Intergovernmental Cooperation Act of 1968, which required, to the extent possible, coordination and integration of Federal planning, and incorporated without much change the policies, objectives, and procedures previously included in Circular A-80.

Circular A-95 has been revised several times. Before 1973 the primary objective of part IV of the circular was to promote geographic conformity among planning areas through the development of sub-State districts. This was seen as an important prerequisite in developing coordination arrangements among organizations planning on an areawide basis. As sub-State districting systems were developed by the States, the emphasis of part IV was modified to improve arrangements for coordinating areawide functional planning, such as health planning, which was generally carried out by organizations other than the designated areawide agencies.

This change in emphasis was made in the November 1973 revision of part IV of the circular. The modifications

- encouraged, but did not require, Federal agencies administering programs assisting or requiring areawide planning to use the designated areawide agencies to carry out or coordinate such planning; and

- required that Federal program regulations supporting areawide planning provide for a memorandum of agreement when the organization funded for areawide planning was not the designated areawide agency. This agreement would be between the organization and the designated areawide agency.

It was anticipated that memorandums of agreement would cover such things as provisions for joint studies and use of resources, organizational arrangements, and use of common and consistent statistics, projections, and assumptions about the area and its future. Although part IV of the circular indicated subjects to be covered in the agreement, it did not prescribe the form or substance of the agreements. These were considered matters to be negotiated between the two organizations.

OMB's directives on areawide planning reflect a changing process. However, the basic goals were to counteract the tendency of Federal programs to promote areawide planning activities which were uncoordinated geographically, functionally, and organizationally. In nonmetropolitan areas this tendency caused a drain on limited planning resources, while

in metropolitan areas it caused confusion and duplication of efforts. It also reduced the possibilities of meeting the objectives of the Intergovernmental Cooperation Act.

CHAPTER 3

FEDERAL PLANNING PROGRAMS

ARE NOT FULLY COORDINATED

The Intergovernmental Cooperation Act of 1968 and OMB Circular A-95, part IV, call for coordinated planning at the local and areawide levels. Our review shows that because of the establishment of separate Federal planning programs and Federal agencies' and State governments' use of single-purpose organizations instead of the designated areawide comprehensive planning agencies, a myriad of organizations, planning on an areawide basis in similar functional areas, has been created. Typically, in a given geographic area no one organization is responsible for overseeing all planning. As a result, coordinated areawide planning is difficult, if not impossible, to achieve and is not fully taking place.

Several studies documenting the difficulties involved in achieving the coordination goals of the act and Circular A-95 call attention to problems resulting from the growth of Federal programs and planning organizations, differing geographic boundaries for planning, and differing administrative requirements. Two studies have especially highlighted fundamental issues at the Federal, State, and local levels.

The 1969 Federal Interagency Task Force on Planning Assistance study of 36 Federal planning programs stated:

"* * * This analysis clearly revealed that these programs evolved outside of any consistent policy or administrative framework. In short, the combined package of programs did not represent an interrelated system or process. These programs were established in piecemeal fashion at various times to satisfy particular needs or demands. Only one Congress has failed to establish at least one new program since 1946. Most of these programs are directly linked with a particular functional concern or interest. To a considerable extent, each separate program encourages its own consistency at the State, area-wide, and local levels. This fosters duplication, conflict in goals, and wasteful expenditure of public monies. This heritage makes it difficult, if not impossible, to direct these programs toward the solution of related problems or to even piece them together to provide effective mutual support for broad National, State, and local objectives * * *"

In 1973, the Advisory Commission on Intergovernmental Relations completed a massive 2-year study which concluded that the structure of local government was approaching "wild chaos." The Commission reported:

"* * * A major cause is the mad-paced proliferation of areawide governmental units. In less than a decade and a half, thousands of new structures that are larger than cities but smaller than States have been established by Federal, State, local governments. Most of them are single purpose, although some are multipurpose. The majority have boundaries that do not match the borders of cities and counties.

"These new bodies were formed because of a mismatch between the jurisdictional reach of existing local governments and mounting areawide problems. But no coherent regional strategy has existed. Whenever the need was felt for an areawide structure, one was set up in a vacuum with little heed to other units. Thus, the resultant chaos.

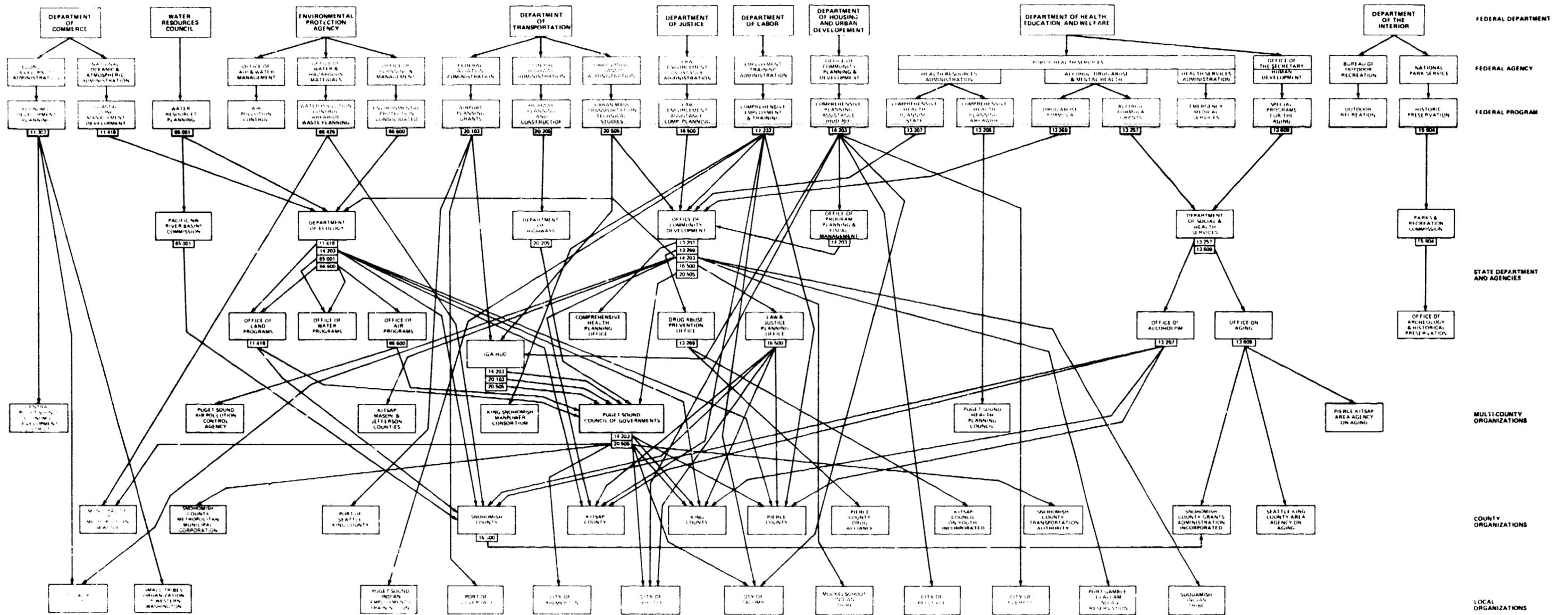
"The question no longer is whether there will be systems of regional governance. These structures exist and more are being created every year. The real questions before Federal, State, and local government now are: What can be done to reduce the fragmentation at this crucial level of government? How should these areawide structures relate to existing general purpose local governments and special districts?"

FUNDING OF FEDERALLY ASSISTED PLANNING PROGRAMS IN THREE AREAS

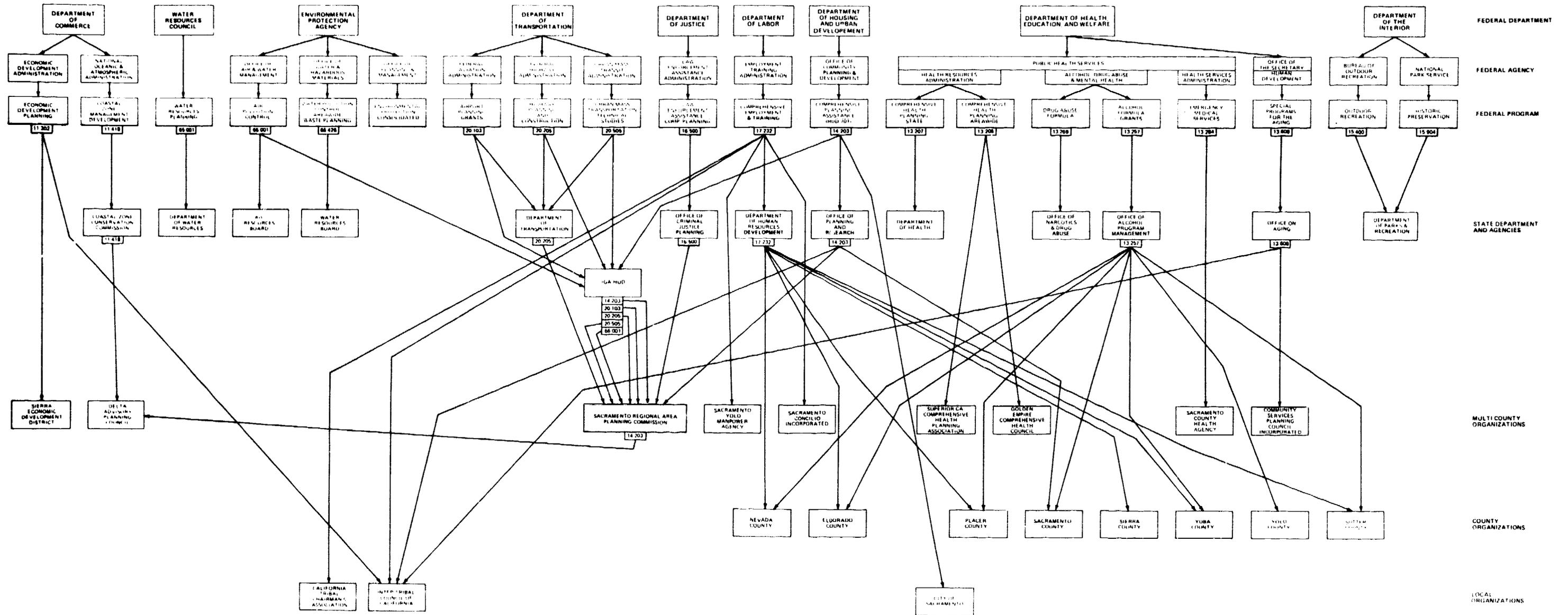
We identified the flow of Federal planning funds to State, areawide, and local organizations for each of the 20 programs and 3 geographic areas we reviewed. The charts on pages 15, 17, and 19 show this information for the Seattle, Sacramento, and Atlanta areas. The extent to which planning under the 20 programs was carried out on an areawide basis was variable, depending on the circumstances in each State.

The Federal departments and agencies with the planning programs they administer are shown on the top three rows of the charts. The numbers shown under the Federal programs are from the Catalog of Federal Domestic Assistance. The next two rows show the State departments and offices involved in each program followed by two rows showing organizations that plan on an areawide basis. These organizations

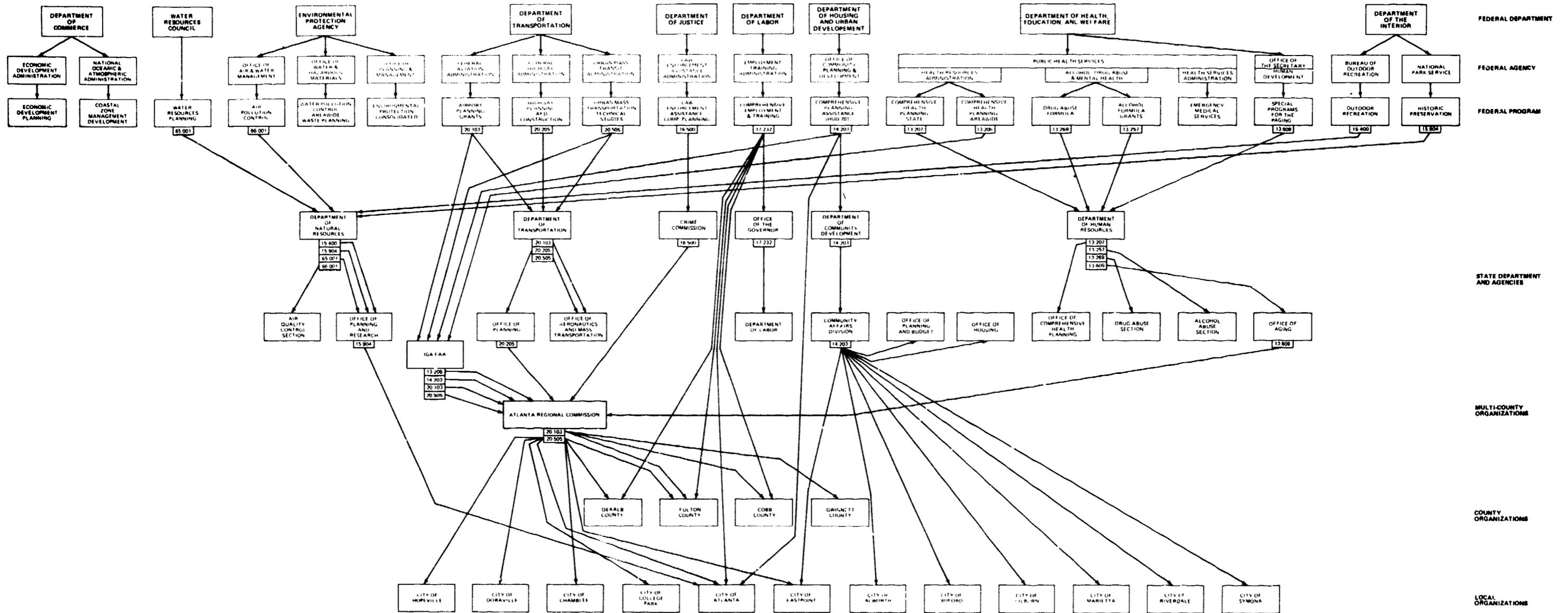
FEDERAL PLANNING FUNDS IN THE PUGET SOUND AREA-1975



FEDERAL PLANNING FUNDS AWARDED IN THE SACRAMENTO AREA - 1975



FEDERAL PLANNING FUNDS AWARDED IN THE ATLANTA AREA - 1975



include those multicounty and single-county public agencies and nonprofit organizations that plan for an area composed of two or more local government jurisdictions. The bottom row shows the organizations, which are generally local governments, that plan within boundaries of one jurisdiction.

Several Federal programs provide funds for both planning and delivery of services. The charts identify only the organizations involved in the flow of planning funds and not the organizations which solely provide services under the Federal programs.

The charts demonstrate the tendency of Federal and State agencies and programs to create separate systems to accomplish planning program objectives. As shown on the charts, a variety of Federal departments and agencies fund planning programs and many organizations exist to prepare the plans at the State, areawide, and local levels. Similar to the situation at the Federal level, no single organization at the State or multicounty level, with the exception of the Atlanta area, has control over or responsibility for coordinating planning efforts.

The Advisory Commission on Intergovernmental Relations in its 1973 report on Sub-State Regionalism and the Federal System stated that the average metropolitan area had 90 governmental units. Yet, in most areas no authority existed to act on areawide problems. The report noted that Atlanta was one of the few areas where one organization was responsible for coordinating planning efforts, and the data collected by the Commission indicates that Sacramento and Seattle are more typical of the situation nationwide.

As shown on the charts, planning funds flow from the Federal level to the ultimate recipient through several combinations of planning levels. These combinations and the number of occurrences for the Sacramento, Seattle, and Atlanta regions are shown in the following analysis.

Flow of Federal planning assistance funds	Number of occurrences		
	<u>Sacramento</u>	<u>Seattle</u>	<u>Atlanta</u>
Federal to State	9	6	11
Federal to State to areawide	18	26	3
Federal to State to areawide to local	-	-	-
Federal to State to local	2	5	8
Federal to areawide	12	14	10
Federal to areawide to local	-	3	6
Federal to local	<u>4</u>	<u>9</u>	<u>2</u>
Total	<u>45</u>	<u>63</u>	<u>40</u>

Ideally, for areawide planning to be effectively controlled and coordinated, the planning systems should include a process whereby funds flow through all affected planning levels. This was not the case in the last four funding combinations, and in our opinion, the number of occurrences in which the intermediate planning levels were bypassed was large.

The number of organizations on the funding charts involved in the flow of planning funds at each governmental level for the three geographic areas is shown below.

	<u>State</u>	<u>Multicounty</u>	<u>County</u>	<u>Local</u>	<u>Total</u>
Sacramento	13	9	8	3	33
Atlanta	18	1	4	12	35
Puget Sound	16	7	12	12	47

These various fund flow combinations and numerous organizations create a maze that is difficult to comprehend and nearly impossible to effectively coordinate.

Some of the 20 Federal planning programs we reviewed, although in appearance single-function, were actually multi-function. Planning for the aged, for example, requires considering their needs in such areas as health, transportation, education, housing, and recreation. Planning to improve or protect water quality requires considering its interrelationships with land use, transportation, air quality, economic

development, health, and recreation planning. Yet, we found that planning organizations generally did not perceive that their programs involved functions other than the primary function for which they were planning. When it was perceived, the planning organizations undertook their own planning without drawing on other organizations' plans.

The extent of multifunctional interests of the 20 planning programs as perceived and indicated would be performed by each of the organizations planning in the Puget Sound Council area is shown on the following page.

An OMB official said that from his experience, the multifunctional interests of the Federal planning programs should be more extensive than that shown on the chart. For example, he saw the Coastal Zone program as relating to planning for recreation, environmental protection, and economic development in addition to natural resource conservation. The extensive multifunctional involvement of each of the programs resulted in overlapping planning efforts by the various organizations.

NONUSE OF DESIGNATED AREA- WIDE PLANNING AGENCIES

Circular A-95, part IV, encourages Federal agencies that fund programs or assist or require areawide planning to use the designated areawide comprehensive planning agencies to implement or coordinate their programs. Generally, the planning agencies have been designated by the Governor or by State law, or recognized by OMB. Even though a designated planning agency existed in each of three geographic areas we reviewed, Federal and State agencies were not fully using them.

Our review showed that many other organizations received Federal planning funds on an areawide basis. The organizations were classified as either multicounty (planning for two or more counties) or single-county (planning for all governmental units within the boundaries of a single county). In the four-county Puget Sound area, the Puget Sound Council of Governments, a multicounty organization, was the designated planning agency during our review. However, 6 other multicounty and 12 single-county organizations also received funds to plan on a multijurisdictional basis. In the Sacramento area, many other multicounty and single-county organizations plan on a multijurisdictional basis, in addition to the Sacramento Regional Area Planning Commission, which is the designated planning agency. In contrast, the Atlanta area includes single-county multijurisdictional planning organizations, but the Atlanta Regional Commission is the only multicounty areawide planning agency.

Various factors have worked against full implementation of the circular's provision for using the designated planning agencies to plan or coordinate planning. For one, the provision was not included in the circular until the November 1973 version and then it was written as an encouragement rather than a requirement to Federal agencies. By encouraging rather than requiring the use of designated areawide planning agencies, the option was available for Federal agencies to use other planning organizations, especially those they created and dealt with in the past.

The circular did not specifically direct the Federal agencies to review existing designations of planning agencies to comply with the new provision. Federal agency officials told us they thought the new provision applied to future but not existing designations. An OMB official said he thought the Federal agencies could apply the new provision to both existing and future designations, but the question of application was never presented to OMB. However, actions would depend not only on the Federal agency, but on Governors and local officials.

Under several federally assisted planning programs, State agencies are responsible for designating the organizations to plan on an areawide basis. The circular, however, does not encourage the State agencies to use the designated planning agencies, and in some cases, they were not used. One reason for nonuse is that under State planning practices, which predate Federal planning assistance, county boundaries and their governments are used as the basis for planning, not the boundaries and planning organizations designated for the State's multicounty planning and development districts. Sometimes, when State agencies needed to plan or coordinate on a multicounty basis or even a single-county basis, planning agencies other than the designated multicounty or single-county agencies were used. (See example on p. 31.)

Differing requirements under Federal planning programs concerning planning body organizational makeup have also worked against using the designated planning agency. Policy board and citizen participation requirements specified in administrative regulations, and in some cases in Federal legislation, differ among the programs. For example, the Department of Housing and Urban Development's 701 planning program (see app. II) requires that its program be administered by an organization composed of at least two-thirds of locally elected officials, or persons responsible to them, unless otherwise provided by State law.

The Economic Development Administration's (EDA's) economic development planning program regulations require its planning organizations to be composed of at least 51 percent locally elected officials and representatives from the local economic structure. The Department of Health, Education, and Welfare's (HEW's) planning program for aging requires its advisory councils to be composed of at least one-half consumers, including low-income, minority, and elderly persons. The Law Enforcement Assistance Administration's planning program requires a majority of locally elected officials and representatives of law enforcement agencies, criminal justice agencies, and public agencies involved in reducing and controlling crime.

Such differing requirements make it difficult for the designated planning organization to be the planner under all programs. On several occasions, the Sacramento Regional Commission tried to obtain additional planning responsibilities, but failed. In one such attempt, the commission petitioned EDA to be the economic development planner for the area but was refused because it did not meet EDA's organizational body requirements--the commission's governing board was totally composed of locally elected officials.

On the other hand, it is possible for the designated agency to be responsible for planning, even with the differing and conflicting requirements. Of the three designated area-wide comprehensive planning organizations reviewed, only the Atlanta Regional Commission was State-legislated as the official planning agency for all State and Federal programs carried out in its seven-county area. This legislation had the effect of requiring the Federal agencies to use the Atlanta Commission for any federally assisted planning taking place in the multi-county area. To overcome the conflicting organizational requirements, the commission established advisory councils and special purpose task forces to meet the unique organizational requirements of Federal programs. For example, to meet HEW's requirements for the aging program, the commission established an Advisory Council on Health and Social Services Planning and a task force.

The Sacramento Commission and the Puget Sound Council are not State-legislated, and the Federal and State agencies use other multicounty and single-county organizations to perform the required planning. For example, the aging program in the Sacramento area is administered in the eight-county sub-State district by a nonprofit organization and in the Seattle area by three nonprofit organizations, one covering two counties and the other two covering one county each.

NONCOORDINATION OF PLANNING IN THE SAME FUNCTIONAL AREA

Our review showed that many Federal planning programs appear to be single-function oriented, but these programs and the planning organizations they fund often have an interest in other functional areas. As a result, more than one organization often plans in the same functional area, and we found that the activities of these planning organizations were not always coordinated to achieve integrated planning by insuring that noncomplementary efforts would be minimized or eliminated.

Using the same 10 functional planning topics from p. 24, we inquired of each areawide organization its perceived functional planning responsibilities that had or would be performed under the Federal programs supporting it: the indicated planning interests for the areawide organizations in the three regions are on pages 28, 29, and 30.

The tables indicate many cases of mutually perceived functional planning responsibilities that had or would be performed by the areawide planning organizations under the Federal program supporting them. According to an OMB official, the tables also show a lack of perception of the additional functions which the planning organizations should consider in addition to their supported functional planning effort. The tables do not show areawide planning activities of federally assisted State agencies or areawide planning activities financed with State and local funds. If these planning activities were included, the incidence of mutual planning interests would increase.

Anticipating multiorganizational interest in similar planning topics and possible duplication, Circular A-95, part IV, requires any applicant for federally assisted planning to coordinate its planning with "related planning" (not defined) being carried out by the designated areawide comprehensive planning agency, and to submit to the funding agency a memorandum of agreement between the two parties covering the means by which their planning activities will be coordinated. Applicants' interpretation was that if their planning is not related to planning being carried out by the designated comprehensive planning agency, the applicant does not have to adhere to the planning coordination provisions of the circular. Furthermore, applicants are not required to coordinate their planning with related planning carried out by noncomprehensive planning agencies.

Federally Assisted Functional Planning Interests of Areawide Organizations
in the Seattle, Washington Area

Organizations	Functional Interests										Total	
	Health	Education	Law enforcement	Man-power	Recreation	Environmental protection	Housing	Transportation	Economic development	Natural resource conservation		
Multicounty:												
Puget Sound Council of Governments					X	X	X	X			X	5
Central Puget Sound Eco. Devel. District						X			X		X	4
Puget Sound Health Planning Council	X			X								1
Puget Sound Air Pollution Control Agency						X						1
Kitsap, Mason, and Jefferson Counties						X						1
Pierce/Kitsap Area Agency on Aging	X			X		X		X				4
King/Snohomish Manpower Consortium				X								1
Single-County:												
Port of Seattle-King County						X		X			X	3
Pierce County Drug Alliance	X											1
Kitsap Council on Youth, Inc.	X											1
Municipality of Metropolitan Seattle						X		X				2
Snohomish County Transportation Authority								X				1
Snohomish County Metropolitan Municipal Corporation								X				1
Snohomish County Grants Administration, Inc.	X											2
Seattle-King County Area Agency on Aging	X	X		X			X	X	X			7
King County	X		X	X				X			X	3
Kitsap County	X		X	X							X	4
Pierce County											X	4
Snohomish County											X	2
Total	<u>8</u>	<u>1</u>	<u>5</u>	<u>6</u>	<u>3</u>	<u>6</u>	<u>4</u>	<u>8</u>	<u>1</u>	<u>6</u>	<u>6</u>	<u>48</u>

Federally Assisted Functional Planning
Interests of Areawide Organizations
in the Sacramento, California Area

<u>Organizations</u>	<u>Functional Interests</u>							<u>Total</u>
	<u>Health</u>	<u>Educa- tion for- ce- ment</u>	<u>Man- Recrea- tion power</u>	<u>Environmen- tal protection</u>	<u>Housing</u>	<u>Transpor- tation</u>	<u>Economic development</u>	
<u>Multicounty:</u>								
Sacramento Regional Area Planning Commission		X	X	X	X	X		X
Delta Advisory Planning Commission								X
Sierra Economic Develop- ment District							X	
Golden Empire Com- prehensive Health Council	X		X					
Superior California Comprehensive Health Planning Association	X	X						
Sacramento County Health Agency	X		X			X		
Community Services Planning Council, Inc.	X				X	X		
Sacramento-Yolo Man- power Agency	X		X					
Sacramento Concilio			X					
<u>Single-County:</u>								
Eldorado	X		X					
Placer	X		X					
Nevada	X		X					
Sierra	X		X					
Yolo	X		X					
Sacramento	X							
Yuba	X		X					
Sutter	X		X					
<u>Total</u>	<u>13</u>	<u>1</u>	<u>10</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>1</u>	<u>2</u>
								<u>35</u>

Federally Assisted Functional Planning Interest of
Areawide Organizations in the Atlanta, Georgia Area

<u>Organizations</u>	<u>Functional Interests</u>										<u>Total</u>
	<u>Health</u>	<u>Educa- tion</u>	<u>Law enforce- ment</u>	<u>Man- power</u>	<u>Recrea- tion</u>	<u>Environ- mental protection</u>	<u>Housing</u>	<u>Trans- portation</u>	<u>Economic develop- ment</u>	<u>Natural resource conservation</u>	
Multicounty: Atlanta Regional Commission	X		X	X	X	X	X	X	X	X	9
Single-County: Fulton County	X			X		X		X	X		5
DeKalb County	X			X		X		X	X		5
Gwinnett County	X			X		X		X	X		3
Cobb County	X			X		X		X	X		5
<u>Total</u>	<u>4</u>		<u>1</u>	<u>4</u>		<u>5</u>		<u>5</u>	<u>5</u>	<u>1</u>	<u>27</u>

Because all planning efforts are not required to be coordinated, uncoordinated planning has occurred. For example, two organizations in the Puget Sound Council area were funded in 1975 for drug abuse planning for Kitsap County, Washington, a multijurisdictional area.

HEW, under its drug abuse formula grant program, provided funds to the Washington State Drug Abuse Prevention Office to coordinate drug abuse planning statewide. During fiscal year 1975, this State office awarded a grant to the Kitsap County Council on Youth, Inc., a nonprofit corporation, to develop a community planning system to meet early drug intervention needs of Kitsap County.

Meanwhile, Kitsap County received State funds from the State Department of Social and Health Services to prepare the county's annual drug abuse plan. The Kitsap County Board of Commissioners contracted with the Program Planning and Grant Administration, Inc., another nonprofit corporation, to perform the Drug Abuse Planning and Administration for the County.

In an April 1975 letter to the Kitsap County Council on Youth, Inc., Program Planning and Grant Administration, Inc., expressed concern that two such groups would incur additional expense and duplication of planning services.

The State Drug Abuse Prevention Office, which had been made aware of the letter, agreed with the Program Planning and Grant Administration, Inc. that evidence of a lack of communication, or at least miscommunication, existed. But, according to the State office, the grant award did not mean that it was designating the Kitsap County Council on Youth, Inc. as the drug abuse planning agency for Kitsap County, nor did it increase the council's planning capability. However, the grant award to the council indicated otherwise. It stated that phase I of the project

"* * * would entail the development of a planning system and planning capability; i.e., to bring all of the disparate youth agencies, law enforcement, medical and educational systems together to agree upon interest, objectives, and commitment.

"Phase II would entail the development of a fully documented plan * * *."

Neither of the two organizations had agreements with the Puget Sound Council, the designated planning agency, or between themselves. Further, no Federal funds were involved in the planning efforts of Program Planning and Grant

Administration, Inc., and therefore, the circular provision did not apply.

Puget Sound Council staff members agreed that no agreement was required with the latter organization because of the noninvolvement of Federal funds. Regarding the Kitsap County Council on Youth, Inc. project, they said the project does raise a question about coordination, but because the project did not go through the A-95 review and comment process, they are unsure whether the Puget Sound Council has a role.

Another example of a lack of coordination occurred in the Atlanta, Georgia area, when the Atlanta Regional Commission in December 1972 reviewed and commented on an Atlanta University proposal to the Urban Mass Transportation Administration, Department of Transportation, to study urban transportation and urban affairs. The commission found the proposal compatible with its responsibility for regional transportation planning and stressed in its review comments the importance of the university (1) coordinating its efforts with the planning efforts of the commission and two other organizations which perform transportation planning in the area under a triparty agreement and (2) using up-to-date transportation planning data available from these agencies.

The university did not coordinate with the commission during the study. In January 1974 the university requested the commission to review and comment on the completed study. The commission commented that the study should not receive widespread distribution because of the large number of factual errors relating to the metropolitan rapid transit program and the Atlanta Area Transportation Study. Commission officials said the university's study did not accurately relate the commission's technical and policy considerations and policies regarding regional transportation. The commission also disagreed with the manner in which certain other information was presented in the study and felt that opinions and conjectures were presented as facts.

The commission, on July 11, 1974, requested the Urban Mass Transportation Administration to

- require the university to immediately incorporate its project into the commission's regional transportation planning program,
- require the university to develop a memorandum of agreement with the commission, and/or
- take other appropriate actions to insure continuing coordination.

At the time of our review, the commission had not received a response from the Urban Mass Transportation Administration on its request.

Duplication of effort occurred in the Sacramento, California area, when the Department of the Interior, under its Historic Preservation program, provided funds to California's Department of Parks and Recreation to prepare the annual State historic preservation plan. The State plan is required to include an inventory of historical structures and means of preserving them. The State department uses the county as a basis for planning, and within each county a coordinator is appointed to prepare the inventory data.

During fiscal year 1975, Sacramento City's Housing and Redevelopment Agency received a grant under the Department of Housing and Urban Development's comprehensive 701 planning program to study ways and to test means of preserving architecturally or historically significant buildings in the central city area. The grant application asked for \$25,000 the first year and estimated that an additional \$142,500 would be needed over the following 2 years to complete the project.

Sacramento's application for funds was processed through Circular A-95's project notification and review system and the State Department of Parks and Recreation was provided with a copy of the application. The State department, however, did not comment on the application.

Because of the apparent duplication of effort, we contacted both State and city officials who said they were unaware of each other's involvement in historic preservation planning. At the time of our contact, the city had not yet begun its project. After we acquainted the groups with one another, both State and city officials assured us that they would coordinate their efforts.

These three examples involve planning which was not coordinated or perceived to require coordination because of the applicants' narrow interpretation of related planning or because Federal funds were not involved. In the last two examples, the organizational staff and the Federal officials we talked to relied on Circular A-95's project notification and review system to identify possible planning overlap. The circular system, however, is not sufficient to insure coordinated planning as it is being carried out. In the Atlanta example, the application was coordinated, but the study, as it took place, was not. In the Sacramento example, the State reviewer did not recognize the importance of the city's application.

An OMB official stated that the narrow interpretation suggests that OMB needs to make more clear to others its own broader understanding of what comprehensive planning is and what a comprehensive planning agency does.

MEMORANDUMS OF AGREEMENT

Earlier versions of Circular A-95 required applicants for planning assistance to identify related planning under other Federal programs or under State and local programs within the multijurisdictional area. This provision was dropped from the two latest circular revisions and replaced with a provision calling for coordination and memorandums of agreement concerning related planning of only the designated areawide comprehensive planning agency.

Very few memorandums of agreement have, however, been prepared. Instead, planning organization staff members told us that they relied on informal contacts, advisory committee participation, and the A-95 review and comment process to coordinate their activities. They have not always been successful.

In the Seattle area, the only memorandums of agreement executed were between the Puget Sound Council of Governments and (1) the Washington State Aeronautics Commission, (2) the Puget Sound Health Planning Council, (3) the Municipality of Metropolitan Seattle, and (4) the Central Puget Sound Economic Development District. In the Sacramento area, only three organizations planning on an areawide level prepared the required memorandums. In most instances, memorandums of agreement were simply paper exercises and planning officials did not see them as being particularly effective in solving the problems of poor communication and functional overlap.

Extensive coordination of planning activities in the Atlanta area was not needed because of the fewer planning organizations, reliance placed on the A-95 review and comment process, advisory committee participation, and written agreements which identified the organization responsible for performing and coordinating planning. Examples of these efforts follow.

- The State Bureau of Aeronautics plans an airport in collaboration with a city or county and obtains population and economic data for airport system development from the designated areawide planning agency.

--An agreement for transportation planning was made between the Atlanta Regional Commission and two other organizations interested in transportation. Under the agreement the commission had overall responsibility to develop a regional program. The agreement provided for joint participation in (1) carrying out the planning effort and (2) preparing an annual work program and budget outlining the work to be done and expenditures by each agency.

In our opinion, even if all required memorandums of agreement were prepared and used, the required day-to-day coordination in an area such as Seattle would be a difficult, time-consuming task. For instance, in the Puget Sound Council area, six areawide organizations are interested in environmental protection and eight areawide organizations are interested in transportation; the Puget Sound Council would be expected to coordinate and integrate all planning activities of these organizations.

It appears that the most practical way to overcome these difficulties would be to decrease the number of planning organizations.

CHAPTER 4

IMPEDIMENTS TO COORDINATED PLANNING

Federal planning program regulations are, in some cases, either inconsistent with the intent of the Intergovernmental Cooperation Act of 1968 or they fail to address certain matters. Attainment of common boundaries for areawide planning within a given geographic area has been hampered by Federal statutes and regulations and practices of some States. Federal funding of related planning programs for different time periods, a lack of principles for plan contents, and inadequate administration of OMB Circular A-95 make it difficult for State and local officials to coordinate and integrate planning.

DIFFERING PLANNING BOUNDARIES

One purpose of Circulars A-80 and A-95, part IV, was to encourage States to establish planning and development districts which could provide a common geographic base for the coordination of Federal, State, and local programs. District boundaries were to be used by Federal agencies when requiring or assisting planning.

In response, States divided their areas into planning and development districts. The Advisory Commission on Intergovernmental Relations reported in 1973 that 45 States, through State legislation or executive order, had taken action toward creation of sub-State planning and development districts.

Our review and other studies have shown that progress in alining Federal planning program boundaries with sub-State district boundaries has been slow. In Sacramento and Seattle many federally assisted planning program boundaries do not coincide with the district planning boundaries that existed at the time of our review. Tables showing the federally assisted planning program boundaries of multicounty areawide planning organizations in the Sacramento and Seattle areas are on pages 37 and 38.

During our review, the Sacramento district boundary included eight counties, but the Sacramento Regional Commission--the designated planning organization and the agency responsible for carrying out Circular A-95, part I, project notification and review system--covered only six counties. The other two counties, Nevada and Sierra, were not members of the commission. Using the district planning boundary as a basis, only two federally assisted planning programs had coinciding boundaries. In five other programs the planning boundaries covered the same six counties which constituted

Federally Assisted Planning Boundaries in the Sacramento Area

Multicounty planning agencies	Federal planning program	Counties comprising planning districts								
		El Dorado	Placer	Sacra- mento	Sutter	Yolo	Yuba	Ne- vada	Sierra	Other
Sacramento Re- gional Area Planning Commission	Comprehensive planning	X	X	X	X	X	X			
	Criminal justice	X	X	X	X	X	X	X	X	
	Airport planning	X	X	X	X	X	X			
	Highway planning	X	X	X	X	X	X			
	Urban mass transit	X	X	X	X	X	X			
	Air Pollu- tion	X	X	X	X	X	X			
Golden Empire Comprehensive Health Coun- cil	Comprehensive health	X	X	X		X		X	X	
Superior Cali- fornia Compre- hensive Health Planning As- sociation	Comprehensive health				X		X		<u>1</u> /X	
Sacramento County Health Agency	Emergency medical services	<u>2</u> /X	<u>2</u> /X	X		X		<u>2</u> /X		
Community Serv- ices Planning Council, Inc.	Aging pro- gram	X	X	X	X	X	X	X	X	
Sacramento-Yolo Manpower Agency	Employment and train- ing			X		X				
Sacramento Con- cilio	Employment and train- ing		X	X	X	X	X		<u>3</u> /X	
Sierra Economic Development District	Economic development	X	X					X	X	
Delta Advisory Planning Coun- cil	Coastal zone planning			X		X			<u>4</u> /X	

1/Buttee, Colusa, Glenn, Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehoma, and Trinity Counties.

2/Western portion of these counties.

3/Glenn, Butte, San Joaquin, and Colusa Counties.

4/Contra Costa, San Joaquin, and Solano Counties.

Federally Assisted Planning Boundaries in the Seattle Area

Multicounty planning agencies	Federal planning programs	Counties comprising planning district				
		<u>King</u>	<u>Kitsap</u>	<u>Pierce</u>	<u>Snohomish</u>	<u>Other</u>
Puget Sound Council of Governments	Coastal zone manage- ment	X	X	X	X	
	Comprehensive plan- ning	X	X	X	X	
	Airport planning	X	X	X	X	
	Highway planning	X	X	X	X	
	Urban mass trans- portation	X	X	X	X	
Central Puget Sound Economic Develop- ment District	Economic development planning assist- ance	X	X	X	X	
Puget Sound Health Planning Council	Areawide comprehensive health planning	X	X	X	X	
Puget Sound Air Pollution Control Agency	Air pollution program environmental pro- tection	X	X	X	X	
Kitsap, Mason, and Jefferson Counties	Comprehensive planning		X			<u>1</u> /X
Pierce/Kitsap Area Agency on Aging	Aging planning		X	X		
King/Snohomish Man- power Consortium	Manpower planning	X			X	
<u>1</u> /Mason and Jefferson Counties.						

the commission's membership. Under the other federally assisted planning programs, various combinations of counties, both inside and outside the district boundaries, were formed as a basis for areawide planning.

In the four-county Puget Sound Council region, where the council was the designated planning agency for the State's four-county district, most federally assisted planning programs coincided with the district boundary. Some of the other programs, however, covered various combinations of counties. In contrast, the seven-county Atlanta region contained only one agency planning on a multicounty basis.

In many cases, federally encouraged areawide organizations and their planning boundaries existed before the creation of district boundaries and some States made little effort to change them. Therefore, in an effort to bring areawide boundaries of 10 selected Federal planning programs into conformance with district boundaries, the Federal Government, in October 1971, invited the State Governors to work with the Federal agencies and Federal Regional Councils. The States were to initiate this effort.

The Advisory Commission on Intergovernmental Relations' October 1973 study of State districts reported that at least 11 States had taken up on the invitation--5 States had already submitted realignment proposals and 6 States were working on them.

In California, areawide organizations existed before State-designated districts. The Sacramento Commission, as a regional organization, was created in 1964 by resolutions of its member jurisdictions, and at the time of our review was composed of six counties. California established 10 districts in 1971. District 3, in which the Sacramento Regional Commission is located, is composed of eight counties. The other two counties in the sub-State district did not join the commission, and its comprehensive planning and A-95 project notification and review activities did not cover the two counties.

In accordance with State legislation, planning and development districts in California were established by the Council on Intergovernmental Relations, State Office of Planning and Research. The legislation was stated in broad terms, did not require State agencies to use the districts, and bestowed only limited authority for implementing its objectives. Because the district boundaries were not designated in State law, and the circular defined a planning and development district as a multijurisdictional area that had been formally designated

or recognized as an appropriate area for planning under State law or Federal program requirements, some officials concluded that California's districts did not meet the circular's requirements. This may have contributed to differing planning boundaries.

We found that federally funded State planning agencies have created their own districts rather than use the State districts. For example, the California State Office on Aging, with \$8 million provided under the Department of Health, Education, and Welfare's (HEW's) aging program, was to implement programs which would promote and develop a comprehensive and coordinated service system to serve older persons. The State office was responsible for designating planning districts, and HEW's program regulations allowed the State agency to follow the State-designated districts, the comprehensive planning districts, the health planning districts, or to create new districts.

The State aging office chose to create a new system which resulted in 23 districts. With the exception of the Sacramento Regional Commission area and three other areas, the aging districts did not coincide with the State-designated districts. The planning grant for the Sacramento area was not awarded to the areawide comprehensive planning agency, but to a functional areawide planning agency.

HEW officials told us that the basic decisions were made by the State aging office, and HEW's role was limited to reviewing the State's actions for conformance to their regulations.

We asked the Western Federal Regional Council staff director why Federal agencies were approving the establishment of different planning districts by State agencies. He told us the circular provision for common boundaries was not applicable because California did not have official districts--they were not established by State law--and, therefore, very little was being done to implement part IV of OMB circular A-95. The staff director said the Federal Regional Council would support a request from California's Governor to align Federal program boundaries with State districts, but no such request has been made.

On the other hand, an official of the State Office of Planning and Research told us that California's districting problems could be resolved if Federal agencies awarded grants to the existing areawide comprehensive planning agencies. This practice would bring about more commonality in district boundaries.

The question of where responsibility lies for attaining common planning boundaries was discussed with an OMB official. He told us that where the State has established planning and development districts, responsibility for conforming boundaries of federally assisted planning programs would appear to lie with the Federal agencies.

Under part IV of the circular, Governors have a 30-day period to review and comment on proposed boundaries. This provision is not totally effective in achieving uniform boundaries, especially when legislative requirements are stipulated in Federal programs. The new health planning districts created under the recent National Health Planning and Resources Development Act of 1974 illustrate this problem.

The act replaced the State and areawide health planning components of five programs with a new health planning structure. At the areawide level, the act provides for the establishment of health systems agencies and health planning boundaries with certain legislative requirements--specifying the population size included in each district and conforming to the Standard Metropolitan Statistical Areas as defined by OMB.

The legislative requirements for health planning boundaries resulted in health planning districts that had little relationship to the State districts. In Georgia, for example, the new health planning district for the area, including the seven-county Atlanta Regional Commission, covers 24 counties and transcends seven sub-State planning and development districts. The Seattle area is included in a 10-county health planning district, and the Sacramento area is included in an 8-county area. (Recent sub-State redistricting actions by California have reduced the Sacramento Regional Commission's district to 4 counties and established a new sub-State district for the other 4 counties.)

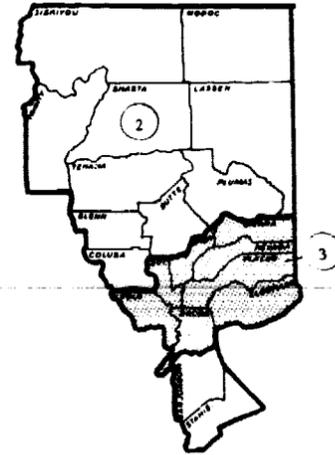
Growth in the number of planning districts with different geographic boundaries has created a barrier to coordinated and integrated planning, particularly in gathering and sharing data, assessment of citizen needs, and availability of resources outside the boundaries of individual programs. Such barriers have been created among agencies planning in different but related functional areas, as well as among agencies planning in the same functional areas.

In the Sacramento area four areawide organizations operating under four federally assisted programs were involved in health planning. The planning boundaries of these organizations were not similar, as shown by the maps on the next page.

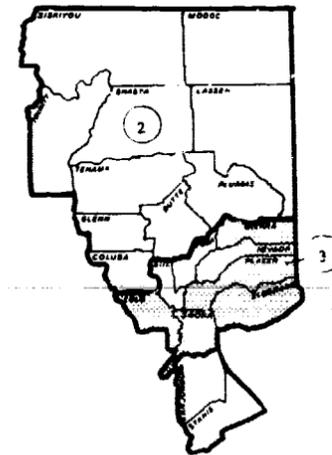
HEALTH PLANNING BOUNDARIES IN NORTHERN CALIFORNIA



CALIFORNIA



8 COUNTY HEALTH PLANNING FOR THE AGED BY THE COMMUNITY SERVICES PLANNING COUNCIL, INC.



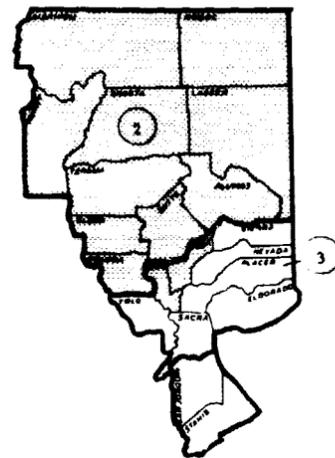
6 COUNTY COMPREHENSIVE HEALTH PLANNING BY THE GOLDEN EMPIRE COMPREHENSIVE HEALTH COUNCIL



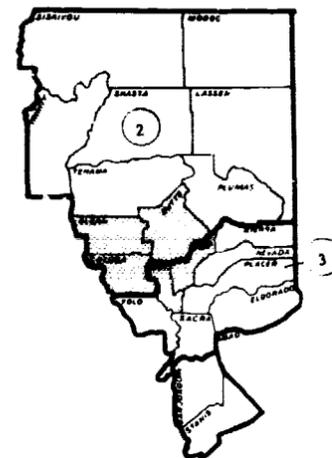
8 COUNTY HEALTH MANPOWER PLANNING BY GOLDEN EMPIRE COMPREHENSIVE HEALTH COUNCIL



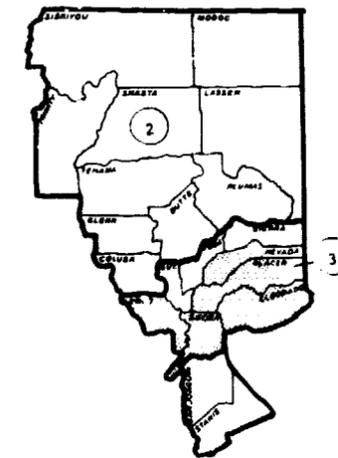
EASTERN PART OF 4 COUNTY EMERGENCY MEDICAL SERVICES PLANNING BY GOLDEN EMPIRE COMPREHENSIVE HEALTH COUNCIL



12 COUNTY COMPREHENSIVE HEALTH PLANNING BY THE SUPERIOR CALIFORNIA COMPREHENSIVE HEALTH PLANNING ASSOCIATION



5 COUNTY EMERGENCY MEDICAL SERVICES PLANNING BY THE SUPERIOR CALIFORNIA COMPREHENSIVE HEALTH PLANNING ASSOCIATION



2 COUNTIES AND WESTERN PART OF 3 COUNTY EMERGENCY MEDICAL SERVICES PLANNING BY SACRAMENTO COUNTY HEALTH DEPARTMENT

The maps show the former eight-county sub-State district number 3 and seven other planning districts that, except for the aging program, did not coincide with anything. Given the number of different planning districts and taking into account needs assessment and resource availability, it is obviously difficult to effectively coordinate health planning within this area.

DIFFERING PLANNING CYCLES

One of the problems facing planning organizations in developing a coordinated planning process is the different planning and funding periods of Federal planning programs.

We analyzed the planning periods of Federal grants held by four organizations performing health planning in the Sacramento area in fiscal year 1975 to determine the coincidence of planning periods. The results are shown below.

<u>Grantee</u>	<u>Program</u>	<u>Period of Federal grant</u>
Golden Empire Comprehensive Health Council	Areawide health planning	1/74 to 4/75
	Health manpower planning under regional medical program	10/74 to 6/75
	Emergency medical services planning under regional medical program	2/75 to 9/75
Superior California Comprehensive Health Planning Agency	Areawide health planning	1/75 to 4/75
	Emergency medical services planning under regional medical program	2/75 to 9/75
Community Planning Services Council, Inc.	Health planning for the aged under aging program	12/74 to 12/75
Sacramento County Health Agency	Emergency medical services planning	7/74 to 6/75

The State Department of Natural Resources in Georgia was planning under four federally assisted programs in different but related functional areas in fiscal year 1974. The four programs were planned at three different periods, making

cross-program planning difficult. We found similar occurrences among planning programs operating in the Seattle area.

To ease the problems of different funding periods, as well as other problems encountered in obtaining funds from multiple Federal sources, OMB initiated the Integrated Grant Administration (IGA) program in 1972. Under this program, a single award with synchronized grant periods was adopted to improve grantee planning and implementation of project activities on a coordinated basis. In our report ^{1/} on this program, we examined six IGA projects, including The Puget Sound Council project, and found that only one had a single award with synchronized grant periods. In the others, including the Puget Sound Council project, funds were awarded separately because of statutory and administrative restrictions or were awarded as additions during the project periods, but these funding periods were not always synchronized with the project periods. In the Puget Sound Council project, the lack of synchronized funding periods resulted in the first- and second-year integrated planning grants running concurrently with the third-year grant.

We concluded that a lack of adequate Federal coordination and commitment impeded the IGA program from achieving the benefits of synchronized grant periods to enable grantees to plan and coordinate better. We recommended timely review and approval procedures to facilitate integrated awards with synchronized project periods.

NO PRINCIPLES FOR PLANNING

Most programs require the compilation of a planning document. Federal agencies have not developed planning principles to be used for all programs and commonality does not exist among the programs as to the type of data to include in the plan to facilitate coordination and integration of planning activities.

Specific plan content requirements range from none for the Department of Transportation's Highway Planning and Research program to six in the Department of Commerce's Coastal Zone Management program. Many requirements are general, such as description of the organization, assurances of cooperation, and proper cross-sections of public participation.

^{1/}"The Integrated Grant Administration Program--An Experiment in Joint Funding" (GGD-75-90, Jan. 19, 1976).

Wide variations in the plan content requirements have not been advantageous to State and local officials in developing policy. Much time is spent by State and local officials in compiling a planning document to coordinate and integrate planning that lacks meaningful objectives and specific actions for measuring progress. If the planning process and documents are not useful, then time and Federal planning funds are not effectively and efficiently utilized. Furthermore, no assurances exist that Federal funds are being wisely spent for implementing projects.

During the past decade, several studies were conducted which analyzed Federal plan content requirements and recommended measures for simplification and improvement. Among these was a Puget Sound Council study which analyzed the local planning process. As part of the study, the council developed a list of planning steps to more specifically define the planning process.

Late in 1975 and early in 1976, HEW's Seattle Regional Office conducted a study of 54 HEW programs which required the preparation of plans or applications for Federal assistance. The study raised the question: When is a plan a plan? It found that plans varied from simple checkoff sheets to massive documents of 300 to 400 pages.

Based on interviews with State and local officials, the HEW staff developed a list of seven basic planning principles or functions to describe the planning process. These functions include assessing and analyzing needs and resources, setting priorities and objectives, allocating resources, and evaluating program accomplishments and unmet needs. Using the seven basic planning functions, the HEW staff analyzed Federal legislation and administrative requirements of the 54 programs to determine how many of the basic planning functions were specifically required. The analysis follows.

<u>Planning function</u>	<u>Number of programs requiring function</u>
Needs assessment	32
Resource assessment	31
Needs/resource analysis	31
Priorities/objectives	34
Resource allocation	26
Evaluation	40
Unmet needs	25

The 54 programs analyzed included 3 of the planning programs considered in our study. The number of planning functions required for the three programs ranged from two to six.

The HEW staff also analyzed a sample of State plans and applications to measure the degree of management planning (planning composed of the seven planning functions) evidenced. They found evidence of management planning ranging from non-existent to substantial. Only one-fifth of the documents reviewed showed much evidence of management planning. The evidence of management planning for the programs included in our study ranged from limited to extensive.

The HEW staff initially interviewed 60 State and local officials and discussed their findings with over 400 Federal, State, and local officials. The staff said their conclusions, on the whole, were in concert with the opinions of

--75 percent of the Federal officials interviewed who said the plans and applications were inadequate for evaluating the program priorities set by the grantees and

--70 percent of the State and local officials interviewed who said the federally required documents were of little value to them in management.

ADMINISTRATION OF CIRCULAR A-95, PART IV

Responsibility for administering provisions of the acts, which serve as the legal basis for Circular A-95, was delegated by the President to OMB. OMB was directed to coordinate the actions of Federal agencies for consistency and uniformity.

The administration of the circular at OMB is assigned to a single official who has no full-time support staff. OMB must rely heavily on many planning organizations and Federal agencies for day-to-day administration of the circular. To carry out Circular A-95, OMB directed Federal agencies to develop their own regulations and procedures for implementation.

OMB does not actively monitor the compliance of Federal agencies with Circular A-95. OMB feels that, because of limited support staff, it must monitor compliance on a case-by-case basis, relying on complaints from planning agencies. Furthermore, OMB considers Circular A-95 to be a mechanism that provides State and local governments the opportunity to interact, and that coordinative activity cannot be forced on them by the Federal Government.

OMB has taken steps to improve administration of the circular. Beginning in September 1974, the Federal Regional

Councils assumed responsibility for coordinating the implementation of the circular by the regional components of Federal agencies. The Councils were established in 1972 to develop closer working relationships between large Federal grant-making agencies and State and local governments and to improve coordination of the categorical grant-in-aid system. The Under Secretaries Group for Regional Operations, under the chairmanship of the Deputy Director, OMB, is responsible for the Councils' proper functioning.

Under the decentralization procedures, OMB retained responsibility for policy oversight and determinations and the Councils had authority and responsibility for coordination of A-95 implementation. The procedures outlined the Councils' responsibilities to include responding to information requests, disseminating information, handling complaints of noncompliance, and communicating regularly with OMB on the status of implementation in the region. Furthermore, the Councils were accorded the widest flexibility in seeking improvements and could undertake such actions and initiatives they deemed appropriate.

In principle, we concur with OMB's decision to decentralize administrative responsibilities. However, the success of the Councils depends on how OMB addresses certain factors.

As noted in our report assessing Federal Regional Councils, 1/ the Councils were impeded from being more effective by factors such as limited staff and inconsistent commitment by Federal agencies. Except for the staff directors and support staff assigned by the Council Chairmen's agencies, Council Chairmen, members, staff, task force representatives, and ad hoc participants divided their time between the Council and agency duties. Further, the Council members had to be thoroughly convinced of the potential value of particular projects before they could completely commit themselves. Despite these factors, the Councils generally made a concerted effort on projects when the Under Secretaries Group and OMB provided management direction and assistance.

1/"Assessment of Federal Regional Councils" (B-178319, Jan. 31, 1974).

CHAPTER 5

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The establishment of separate Federal planning programs, Federal agencies' use of single-purpose planning agencies at the areawide level, and a general lack of State government insistence on the use of designated areawide comprehensive planning agencies has created a myriad of organizations planning on a multijurisdictional level in many functional areas.

Generally, no one organization is responsible for overseeing all planning. Because of the individual funding of planning organizations and their great number, coordinated planning as called for by the Intergovernmental Cooperation Act of 1968 is very difficult, if not impossible, to achieve, and consequently is not fully taking place.

The Office of Management and Budget, through Circular A-95, part IV, has attempted to promote coordinated planning; some progress has been made. However, because of the resistance to change in any large, complex system and a lack of vigorous action at the Federal, State, and local levels, planning programs continue to be fragmented and largely uncoordinated. As a result, an important process has not been fully developed for assuring that the billions of Federal dollars allocated to accomplish domestic program objectives are being used efficiently and effectively.

Other impediments to coordinated and integrated planning at the State, areawide, and local levels exist in many federally assisted planning programs. Planning grant periods do not coincide, information included in plans is often insufficient to coordinate and integrate related planning efforts or to guide and evaluate the funding of implementing projects, and the geographic areas of related functional planning activities are not always consistent.

Unenacted legislation introduced in the Senate in March 1976 (S. 3075) and in the House in August 1976 (H.R. 14990) to establish a national policy on areawide planning and its coordination would have helped to correct certain problems identified by our review, such as the inconsistent use of planning agencies and boundaries. ^{1/} The legislation would

^{1/}Similar legislation was introduced in March 1977 in the Senate (S. 892) and in the House (H.R. 4406).

have given a more specific legislative base to part IV of Circular A-95.

In addition, the proposed legislation would have gone further than part IV of the circular in strengthening planning focal points at the areawide level in several important ways. First, if sub-State districts established by State and local officials met certain criteria, Federal agencies would have been required to observe the district boundaries in their areawide planning programs. Second, the legislation expressed a preference for areawide planning agencies composed of elected officials to perform comprehensive areawide planning and provided a process under which State and local officials could obtain waivers of program requirements which have had the effect of encouraging the creation of separate noncomprehensive areawide planning organizations. Finally, the bill would have required that an area development plan be adopted along with an annual coordination program to show how federally assisted areawide planning programs supported the adopted plan.

Proposals like Senate bill 3075 and House bill 14990 would not, however, alter the existing array of federally assisted planning programs and, therefore, would not completely deal with all of the problems identified in our review.

Enough similarity exists among federally assisted planning programs to consider funding of planning activities through fewer programs. For example, the Integrated Grant Administration program, which provides grantees the opportunity to package Federal funds from different programs to accomplish a single or closely related goal, was principally used to package planning grants. As of February 1975, 25 of the 34 integrated projects in existence were for planning.

While the IGA approach, now formalized under the Joint Funding Simplification Act of 1974, provides a technique for coordinating the delivery of separate Federal assistance programs, our review of the approach shows that it must be viewed as only a limited improvement for dealing with the present complex and fragmented Federal grant system. As we recommended in a recent report to the Congress^{1/}, more fundamental changes, such as grant consolidation, are also needed. We believe that opportunities exist to improve coordination and integration of federally assisted State and local planning efforts through reduction in the number of planning programs and organizations.

^{1/}"Fundamental Changes are Needed in Federal Assistance to State and Local Governments" (GGD-75-75, Aug. 19, 1975).

RECOMMENDATIONS TO THE CONGRESS

We recommend that the Congress establish a national policy on areawide planning and provide a basis for strengthening planning focal points at the areawide level. In our opinion, such policy would promote organizational arrangements to improve coordination and integration of federally assisted planning programs.

To further strengthen multijurisdictional planning, we recommend that the Congress reduce the number of separate programs for areawide developmental planning by consolidating their objectives into a broader purpose-planning program or programs. Such action should increase opportunities at the State and local levels to plan for the unique needs of particular areas. It would also decrease the administrative difficulties a grantee encounters when it needs to use funds from several Federal programs.

RECOMMENDATIONS TO THE DIRECTOR, OFFICE OF MANAGEMENT AND BUDGET

Pending congressional action on our recommendations, we recommend that OMB revise part IV of Circular A-95 to require

- Federal agencies and federally funded State agencies, except when prohibited by law or when deviations are allowed by OMB, to use the designated areawide comprehensive planning agencies to carry out and coordinate areawide planning;
- Federal agencies and federally funded State agencies to use the planning boundaries designated by the States, except when prohibited by law or when deviations are allowed by OMB, as planning and development districts under federally assisted areawide planning programs; and
- recipients of Federal planning assistance to coordinate their planning activities with the designated planning organization and with other organizations doing similar planning.

We also recommend that OMB give increasing emphasis to its efforts to remove administrative and legislative requirements and practices included in federally assisted planning programs, such as different funding periods and organizational requirements, that impede the coordination and integration of planning activities carried out by the State and local governments.

Furthermore, we recommend that OMB develop principles for planning and require their adoption under federally assisted planning programs.

AGENCY COMMENTS

Copies of this report were distributed within OMB, to Federal agencies responsible for programs discussed in the report, to the Federal Regional Councils, and to the major public interest groups representing State and local governments. The Federal Regional Councils secured the views of a sample of State and areawide clearinghouses in each Federal region. OMB consolidated the comments of all respondents into a single response, which is included as appendix I.

The various respondents and OMB were supportive of the study. OMB agreed to give serious study to our recommendations, particularly as they relate to part IV of OMB Circular A-95.

OMB officials noted that planning and the Federal role in planning were extremely complex subjects. They thought the report was good, but felt it would have been enhanced by a more extensive discussion and analysis of planning and of its various dimensions, the critical importance of the State in areawide planning, and the widely varied approaches to allocation of functions among State and local governments.

OMB emphasized that the role of the State in areawide planning is critical. Several reviewers of the report noted that Georgia State law made the difference in the relatively better position of the Atlanta Regional Commission in controlling federally assisted planning, as compared to its counterparts in the Seattle and Sacramento areas. In summary, the consensus was that the States can and sometimes do overcome Federal administrative obstacles to integrating areawide planning.

We generally agree with OMB's assessment of the complexities of areawide planning and believe they should be addressed by OMB and the Congress when deliberating legislative and administrative changes for improvement.

OMB agreed with our fundamental conclusion that the somewhat haphazard establishment of separate areawide planning programs and agencies makes coordinated planning very difficult, if not impossible, to achieve, and that it is not fully taking place. OMB stated that it had not taken a position on our recommendation for congressional action on legislative proposals which would establish a national policy

on areawide planning. The majority of respondents who commented on the recommendation, however, supported it.

While OMB did not fully agree that consolidation of planning assistance programs alone was necessarily the best approach, most respondents favored planning program consolidation. OMB suggested that consolidating related operating programs for which planning is undertaken may provide a more effective way to achieve the desired objectives. Under either approach, the number of planning programs would be reduced and the task of effectively coordinating planning and implementation efforts would be made easier.

Regarding our recommendations on part IV of Circular A-95, OMB's General Counsel ruled that OMB can require Federal agencies to use the designated areawide comprehensive planning agencies for the various functional planning programs, and OMB will therefore seriously consider this recommendation. Although our review and several respondents noted limited progress in attaining uniform planning boundaries, OMB believes that the present language in part IV pertaining to mandating use by Federal agencies of sub-State districts under their planning programs is sufficiently stated to require mandatory use. However, the intent of this provision would tend to be automatically achieved if Federal and federally funded State agencies used the areawide comprehensive planning agencies.

OMB said it will restudy the memorandum of agreement requirement and the assumptions on which it is based. It is embarking on a comprehensive survey of Circular A-95 and the survey findings should help considerably in evaluating planning coordination.

OMB's comments on our recommendation regarding organizational obstacles indicated that it did not consider them to be insurmountable problems. Our review showed that the effort needed to surmount organizational obstacles was so great as to generally frustrate the assignment of planning responsibilities to the areawide comprehensive planning agency. OMB offered some comments on existing mechanisms which it thought would simplify the alinement of funding periods. We recognized that these mechanisms would be of some help, but OMB needs to direct the Federal agencies to coordinate their grant awards.

OMB agreed that the development of planning principles or standards describing the processes that should be included in planning efforts might be worthwhile and, if undertaken, should be an intergovernmental undertaking.

CHAPTER 6

SCOPE OF REVIEW

Our review, made primarily during February to August 1975, included an examination of title IV of the Intergovernmental Cooperation Act of 1968 and OMB Circular A-95, part IV. These directives address the need for coordinated planning at the local and areawide levels. Circular A-95 provides procedures for achieving uniform planning boundaries and for reducing the overlap of planning organizations.

Through interview of officials and review of documents obtained at the Federal, State, and local levels, we evaluated whether the procedures and processes of Circular A-95 adequately implemented the act.

Our fieldwork was performed in the sub-State districts surrounding Sacramento, California; Atlanta, Georgia; and Seattle, Washington. Sacramento was selected because it has one large metropolitan area in a rural and mountain setting. Atlanta was selected because Georgia has a strong sub-State policy, resulting in no geographic overlap and a stronger unified effort for integrated planning. Seattle was selected because the sub-State district contains several relatively large metropolitan areas, increasing the potential for further complications at the sub-State level.

In each of these sub-State districts, we (1) inventoried all federally assisted planning taking place, (2) identified all sub-State organizations engaged in planning, (3) analyzed functional and geographic overlap and the extent of planning coordination, and (4) identified the impact of these problems and the efforts being made to correct them.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

November 19, 1976

Mr. Victor L. Lowe
Director, General Government Div.
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Lowe:

Thank you for the opportunity to review the draft report of the General Accounting Office, Federal Planning Assistance: Need to Simplify Policies and Practices. We distributed copies within OMB, to agencies having programs affected by the report, to the Federal Regional Councils, and to the major public interest groups representing State and local government. The Federal Regional Councils secured the views of a sample of State and areawide A-95 clearinghouses in each Federal region.

Interest in the report was keen to judge from the level of response, most of which included substantive comments. Generally, respondents were supportive of the GAO effort. Nine Federal agencies, all ten of the FRCs and four of the public interest groups (including two responses made directly to GAO): the National Association of Counties, the U.S. Conference of Mayors, the National Association of Regional Councils, and the National Governors' Conference responded. FRCs included comments of some 25 clearinghouses, other clearinghouse comments being incorporated in the FRC comments. We shall quote some of these comments and observations in another part of this response. All of these are available for perusal by GAO.

We believe the GAO Report performs a very useful service. Its recommendations will be given serious study by OMB. Particularly, we shall reexamine some of our assumptions about Part IV of OMB Circular No. A-95, especially the Memorandum of Agreement provision.

We are certain that GAO is aware that planning and planning assistance, as well as the Federal role therein, are extremely complex subjects. Therefore, as good as the report is, we think the analysis would have been enhanced had there been an introductory discussion to more fully explore

some of the complexities. This discussion might have included an analysis of planning and of its various dimensions, the critical importance of the State for areawide planning and the widely varied approaches to allocation of functions among State and local units of government. In short, the very pluralism which is one of the major strengths of our system of government is also a strong contributing factor to the complexity of the situation being studied in this report and deserves consideration.

We think it worthwhile to discuss some of these factors in order to place the OMB response in a clearer perspective.

Planning and its dimensions. On page 63 of the report, there is a very significant statement requiring clarification: "Enough commonality exists among federally assisted planning programs to consider planning as a function by itself." Planning is indeed a function, but it is a function that is best not considered by itself. Planning is a process that is perhaps better considered in connection with some broader or narrower goal or objective.

Many Federal programs call for planning beyond design of a specific project or activity. They require that such projects be related to a broader frame of reference. For instance, it is not enough that a highway be well planned from a purely highway point of view. It should at least be related to a broader transportation plan which seeks to relate all modes in order to give optimum mobility to the public. Beyond that, transportation itself does not stand alone, but affects and is affected by land use, housing, employment, air and water pollution, etc.

This points up one dimension of planning that we assume is widely understood, a hierarchical one, comprising comprehensive, functional, program, and project planning. Each level provides a frame of reference and a guide for the one below it.

Another dimension of planning is territorial or jurisdictional, and it is also hierarchical. State planning should provide a frame of reference, a guide to areawide planning, and areawide planning to local planning. This is related to the above dimension in that all types of planning -- comprehensive, functional, program, and projects -- may be undertaken

by all jurisdictional levels. HUD's 701 program, for instance, assists State, areawide, and local comprehensive planning, and EDA assists economic development planning at all levels.

Not all aspects of any given function need to be planned on an areawide basis. Thus, major highways need to be planned on an areawide or broader basis, but internal street systems can be planned locally. In this respect the flow charts in the GAO Report may look confusing, but may be based, in part, on substantial logic.

Another factor is that jurisdictional boundaries may be adequate for planning some functions but not for others. Watersheds and airsheds, for instance, may be hard to capture within the confines of a single substate district. For many social programs, the service area may be substantially less than the substate district, although extending to several jurisdictions. However, an areawide comprehensive planning agency which "piggybacks" several functional planning programs does not give the same intensity of attention to all parts of the area for any one of those programs but focuses on the parts of the area where the problems to which the programs are addressed are most prevalent.

Allocation of functions. Another factor complicating the areawide planning picture is the variable allocation of operational functions or program responsibilities among the several levels of government: among State, county and municipal levels, not to speak of special purpose governmental units.

While some functions are clearly areawide (e.g., sewer and water), and some are clearly local (e.g., elementary education, certain social services), most are mixed. Transportation, law enforcement, health services, etc., have both local and areawide aspects (not to speak of State). Therefore, the GAO Report charts must be interpreted with this in mind.

State allocation of functions among municipalities, counties, and special districts has happened over time without an overall design and has often been further complicated by Federal eligibility requirements. Although a few States have tried to sort out the allocation problem on a rational basis, they are in a minority.

The role of the State. In view of the above, we believe the report should have given greater emphasis to the critical role of the State. There are limits to how much Federal legislation can influence the allocation of planning responsibilities at State and substate levels. State determination to assign functional planning responsibilities to substate comprehensive planning agencies is hard for Federal agencies to resist. More than one commentator noted that Georgia State legislation made the difference in the relatively better position of the Atlanta Regional Commission in controlling federally-assisted planning in that area, as compared to its counterparts in the Seattle and Sacramento areas. The latter organizations operate under the same Federal rules as the ARC, but without the same degree of State support. In the South, the substate comprehensive planning agency tends to be the preferred or mandated instrument for areawide planning under State law or gubernatorial executive order. The incidence of "piggybacking" functional planning on comprehensive planning agencies is much higher in this region than elsewhere. In short, the States can and sometimes do overcome Federal administrative obstacles to integrated areawide planning. It is, to a substantial extent, a question of wanting to.

It is with the above factors in mind that we hope you will consider our discussion of the recommendations made in the report and our remarks on the text. These are included as Enclosure 1 to this letter.

Enclosure 2 includes selected excerpts from the many respondents who reviewed the report. Most agreed with the main thrust of the report and were variously supportive of individual recommendations. However, the excerpts we have included in Enclosure 2 were not selected because they were either supportive or critical of the report and the recommendations, but because we found them thoughtful and provocative. They tended to provide different or deeper perceptions of the phenomena with which the report dealt, in some respects as we have done. However, OMB offers this selection of respondent observations with no necessary endorsement or disagreement on our part.

I trust that our general remarks in this letter and our consideration of the recommendations and the text in Enclosure 1, as well as respondents' comments included in Enclosure 2, will be useful to the Government Accounting Office.

Sincerely,


for **Fernando Oaxaca**
Associate Director for
Management and Operations

GAO note: Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in final report.

Enclosure 1

I. COMMENTS ON GAO RECOMMENDATIONS

With the factors discussed in the letter to which this is attached conditioning our own perspectives on the situation, we have the following comments on the recommendations of the GAO Report:

A. Recommendations to the Congress

OMB agrees that the somewhat haphazard establishment of separate programs and agencies for carrying out areawide planning makes "coordinated planning as called for by the Intergovernmental Cooperation Act...very difficult, if not impossible, to achieve, and it is not fully taking place." OMB has always taken the position that A-95 can only provide or improve upon the conditions that would make coordination of planning more likely to take place, but by itself, A-95 cannot assure coordination.

In this connection, several commentators noted that the report accepts coordination as a good thing per se, but fails to define it. It is certainly true that it is possible to have a well coordinated fiasco. It may also be worthwhile to have an operational definition of coordination for the purposes of A-95, although there may be other definitions for other purposes. We would suggest the following:

"COORDINATION: A process in which separate governmental actions are fit together in such a fashion as to maximize the resources of governmental units in pursuit of common ends or to minimize the damage governmental units may do to each other in pursuing separate or conflicting objectives."

In looking at A-95, we also suggest that it may be useful to think of two different kinds of coordination -- mandated and negotiated. In a pluralistic society and governmental system such as our own, the extent to which coordination can be mandated is quite limited. A-95 tries to set the stage for a more workable kind of coordination -- that which is negotiated. It tries to do this by forcing governmental units to tell each other what they are planning in the use of various kinds of Federal assistance. It is up to the governmental units involved, however, to perceive potential conflicts or opportunities for cooperation that must be negotiated in

order to minimize damages and maximize resources. This may not be very neat or orderly, but it is potentially more effective than mandated coordination which very often substitutes the illusion of neatness for effective achievement of related objectives.

1. S.3075. "Intergovernmental Coordination Act of 1976." OMB has not taken a position on S.3075. The great majority of those reviewers of the GAO Report who remarked on the bill supported it. Some reviewers felt that the GAO Report would have been improved if the bill had been summarized.

2. Consolidation of planning assistance programs. With respect to integrated grants or joint funding under the Joint Funding Simplification Act, we would agree with GAO that there are limitations on its utility for coordinating separate planning programs. We have not concluded, however, that the solution necessarily lies in consolidation of planning programs. Joint funding holds much promise for planning coordination. It provides an opportunity for packaging relevant planning assistance into a planning program tailored to the needs of the packager. Such needs will vary. Of course, if it were possible to put together an omnibus planning assistance program through consolidation of existing programs, it still would be possible to assemble such tailored packages; however, it will not be simple to develop such a consolidated planning assistance program.

A major Federal study of improved planning coordination, that of the PARCC group in 1969, found very little opportunity for effectively consolidating planning assistance programs. It noted some possibility of consolidating HUD and EDA planning assistance programs, although the emphases are different. Within agencies, some further opportunities have been noted, but where such situations are perceived, we already find substantial progress in administrative coordination. Intermodal programs in DOT and consolidated program grants in EPA come readily to mind.

Our earlier remarks on the nature and dimensions of planning bear upon the feasibility of consolidating planning assistance programs. Planning is a critical element in management and thus pervades all Federal and federally assisted programs and projects, whether or not there is a separate

discernible planning component to any particular program. This suggests that a solution may lie in the consolidation of related operating programs for which functional, program, or project planning is undertaken. Put another way, operational block grant programs provide a more effective way to achieve the desired objectives.

B. Recommendations to the Director, Office of Management and Budget

1. Mandatory use of areawide comprehensive planning bodies. The OMB General Counsel is of the opinion that Section 401(e) of the Intergovernmental Cooperation Act of 1968 provides OMB with authority to require, except where prohibited by law, that Federal agencies use the designated areawide comprehensive planning agencies to carry out areawide planning assistance under various functional programs. Section 401(e) provides that, "insofar as possible, systematic planning required by Federal programs shall be coordinated with and, to the extent authorized by law, made part of comprehensive local and areawide development planning."

The GAO Report recommends that "OMB revise Part IV of Circular No. A-95 to...require Federal agencies and federally funded State agencies, except where prohibited by law or deviations are allowed by OMB, to use the designated areawide comprehensive planning agencies to carry out and coordinate areawide planning." In view of our General Counsel's opinion, OMB will give serious consideration to this recommendation.

However, several questions occur to us on this matter. First, criteria would need to be developed for evaluating requests for waivers of the requirement. Even in the absence of statutory prohibitions, there will be circumstances where the requirement would not be feasible. Second, we should have to have some policy to deal with circumstances where the Governor may wish to designate some other agency. Finally, there is the question of the extent to which such a requirement might stimulate legislative proposals specifically designed to avoid it. If such legislation were passed, would not this adversely affect the efforts of the States to utilize the substate comprehensive areawide planning agencies for functional areawide planning which, as noted above, have been quite successful in some States?

2. Mandatory use of substate districts. Part IV does not need to be amended to require Federal agencies to conform planning areas to substate district boundaries. Paragraph 2.a. reads, in part, "Where the State has established...planning and development districts, the boundaries designated under Federal programs will conform to them unless there is clear justification for not doing so."

This requirement has been most effective for area designations made subsequent to the requirement. As noted in your report (p.44), OMB invited the Governors to develop realignment plans for bringing the previously designated, non-conforming areas into line with the substate district system. This seems to have met with very limited gubernatorial response. Of course, this is understandable to the extent that Governors might be reluctant to disturb established arrangements that are working reasonably well. We also note that, with respect to the first recommendation to the OMB Director, the same sort of problem might arise in trying to make that requirement effective retroactively.

3. Memoranda of Agreement. We found that this recommendation and the findings that led to it quite interesting. We had not been overly impressed with the results of the requirement as it was stated prior to 1973 -- that recipients of planning assistance coordinate their planning activities with each other. This was unfocused. It had been our thought in introducing the present requirement (that federally assisted functional areawide planning agencies coordinate their planning with that of the areawide comprehensive planning agency) that the comprehensive planning agency would take the initiative in seeing that all areawide planning would be coordinated. Obviously, the thesis that functional planning activities coordinated with comprehensive planning would be coordinated with each other has not been sustained in practice.

In A-95, there is no guaranty that there will be good, substantive reviews under the first three parts of the Circular, nor that there will be coordination achieved through the Memorandum of Understanding provision under Part IV. It is in large measure a question of what the clearinghouses want to make of these opportunities. If functional planning agencies seek to avoid the requirement, OMB and the Federal

Regional Councils will make every effort to assure that the funding agencies implement the requirement. However, OMB has received no complaints from clearinghouses about agencies refusing to enter into such agreements with them.

Obviously, however, OMB has to restudy the validity of the Memorandum of Agreement requirement and the assumptions on which it is based. The report raises serious questions as to whether it can be made workable. If it can, then we must discover ways for improving Federal agency implementation - and even more important, stimulate the clearinghouses to use it effectively.

OMB is about to embark upon a comprehensive survey of A-95, which will include questions concerning the level of implementation of Part IV, particularly the Memorandum of Agreement provision. Our findings should be of considerable utility in evaluating the MOA provisions.

4. Organizational obstacles. Most organizational requirements of the various planning assistance programs have some statutory basis. This makes for formidable but not, generally, insurmountable problems in assigning responsibility for planning under those programs to the areawide comprehensive planning agency. We only need note, as we have above, the extent of "piggybacking" of planning programs in the southern States to see that it can be done, particularly when the Governor or State law insists. In only a few instances, such as under the Health Planning and Resources Development Act, is this virtually impossible.

5. Funding periods. The variable planning periods set forth under the different planning assistance programs have been, in part, a reflection of the unpredictable appropriations procedures. With the introduction of the Congressional budget process, it may be simpler to align funding periods in a more consistent fashion. Joint funding simplification procedures may also facilitate improvements in this situation. However, the director of one clearinghouse, who commented on the report, liked the variable funding periods as it helped him with his cash flow problems.

6. Planning standards. It is not clear to us, nor was it clear to some commentators, what GAO means by "planning standards" which, it recommends, be developed by OMB. There were some objections expressed to the idea that OMB would be telling State and local government how and what to plan. This idea would also be unacceptable to OMB.

This recommendation does call for clarification, as it raises real questions of the propriety of Federal planning prescriptions on an across the board basis. It may be appropriate for an agency funding planning for a particular function to set up output or performance standards for that function; but the Federal role in establishing some universal standard is open to serious question.

If the development of standards is seen as a form of technical assistance to planning agencies in the sense of describing the types of elements or processes that should be comprised in plan development, as seemed to be indicated by the HEW effort described in the report, it might well be a worthwhile effort. However, no matter what the meaning of "planning standards" in the GAO Report, if such an effort were to be undertaken, it should be an intergovernmental undertaking, involving State, areawide, and local, as well as professional inputs.

[See GAO note p. 68 .]

[See GAO note p. 68.]

III. SUMMARY

We think that this report will serve a most useful purpose in pointing up the problems and the shortfalls in the workings of Part IV of OMB Circular No. A-95. The problems of developing effective arrangements for coordinating planning at the areawide level are extremely complex, as the report states, and as this response has attempted to illustrate further.

The report points up some very real flaws in OMB perceptions of how Part IV, particularly the Memorandum of Agreement provision, should have been working, and we shall have to reexamine the concept, both as to its essential validity and, if the concept is valid, as to what it is that needs to be done -- on all sides -- to make it effective.

The report has made recommendations that deserve serious study and consideration by OMB. It gives renewed emphasis to the need to develop better arrangements for coordinating federally assisted areawide planning and provides ample evidence of the need for a strong effort on the part of the Federal executive branch - as well, we might add, by Congress, the States, and the clearinghouses themselves - to address these problems more vigorously.

GAO note: Deleted comments refer to material contained in draft report which has been revised or which has not been included in the final report.

Enclosure 2

SELECTED COMMENTS FROM REVIEWS OF GAO REPORT:
"FEDERAL PLANNING ASSISTANCE:
NEED TO SIMPLIFY POLICIES AND PRACTICES"

The following comments were selected from reviews of the GAO report on areawide planning by OMB staff, Federal agencies, Federal Regional Councils, Public Interest Groups, and A-95 Clearinghouses. The comments represent, in part, a cross section of views on the report itself, but also provide some useful insights on the problem of planning coordination.

From an OMB budget examiner:

"We believe the key to effective planning is to establish a direct link between planning activities and implementation. The planning body need not be the implementer. In fact, it would be preferable if it was not the implementer so as to reduce conflicts of interest. However, it is very important to have a single functional planning body with responsibility for approving projects within its areas as opposed to the current situation where several agencies have responsibility within a single functional area."

* * *

"A logical conclusion from the GAO findings -- and one that is not mentioned -- is that the various functional planning bodies should be responsible to, and funded by, a State comprehensive planning body which would coordinate and approve all intra- and inter-State development. This comprehensive planning body would oversee the State's various functional areawide planning agencies which would develop and monitor the implementation of specific plans ...The means to bring about such a comprehensive planning system would be a Federal block grant for planning."

From another:

"The natures of the planning programs -- their goals and objectives -- as described in law are quite diverse, sometimes conflicting, and often very vague. To develop a composite set of standards that would smooth out all the wrinkles in Federal planning assistance would be next to impossible. Or whatever was finally developed would have to be so general as to be useless. The burden of finding some way to rationally integrate the planning programs must lie with Congress."

An OMB division chief:

"GAO's recommendation that OMB develop planning standards goes well beyond our capability. After 22 years, HUD still can't tell us much about the output coming from its "701" program. Knowing as little as we do about planning output, I don't see how we can establish standards for planning input."

From an ACIR official:

"One of the most important findings of the report is buried deep on page 26 and is reflected neither in the 'Digest' nor in the recommendations chapter. The finding is this: The strong substate districting legislation passed by the State of Georgia 'had the effect of requiring the Federal agencies to use the Atlanta Commission for any federally assisted planning to take place in the multicounty area.' Admittedly, this is more of a State point than a Federal one, but it could have significant impact on Federal approaches to coordinating its own programs at the regional level. For example, it might well imply that OMB, the Under Secretaries Group for Regional Operations, and the Federal Regional Councils should actively promote strong substate districting legislation such as offered by ACIR. Such an approach might have considerably greater payoff in implementing Part IV of A-95 than a series of internal administrative battles within the Federal executive branch fueled by a variety of inconsistent Federal-aid programs based upon divergent Federal laws. At the very least, GAO should advise the States that, pending action on the Federal recommendations in this report, the States themselves would be well advised to pass their own strong substate districting laws."

* * *

"In considering non-coterminous planning boundaries, the concept of 'nesting' regions within each other should be mentioned. It is not always possible to have all boundaries the same. Recognizing this, it may still be possible -- through subdistricting or special purpose merging of two or more whole districts -- to meet the basic objectives of coterminality in most cases while still meeting individual program needs."

An agency A-95 liaison officer:

"There are different kinds of planning and there are different programs and purposes for which the planning is done. If standards for planning are to be developed and their adoption required, a clearer identification of the type and scope of standards is needed."

* * *

"It is apparent from the analysis that state legislative standards and state executive leadership are key elements in producing the kind of coordinated approach to substate, areawide planning that is the objective of the GAO report."

Another:

"One impediment that was overlooked is the lack of uniformity in the quality of professional planning provided by substates, both within individual states and nationally. They range from highly competent staffs to none."

And another:

"While this emphasis on simplification and efficient coordination is highly appropriate in evaluating the multitude of Federal planning assistance programs, we feel the report is not balanced by a corresponding sensitivity for the inherent diversity of planning objectives designed to meet citizen needs ... Just as planning is not an end in itself, planning agencies are not the ultimate recipients of planning benefits."

From an FRC A-95 Coordinator:

"A fundamental problem is that legislation is enacted that requires or permits the establishment of many functional planning bodies with jurisdictions differing from those of comprehensive areawide planning bodies. There are no strong incentives to coordinate federally-funded planning and no sanctions against uncoordinated functional agencies being established."

From an FRC Chairman:

"The only really effective route which can be taken to address these problems is through legislative change. Therefore, a stronger recommendation for Congressional relief would be an appropriate modification to the final conclusions of the GAO report."

From an FRC staffer:

"The report makes a highly competent argument for integrated or comprehensive planning and describes its concomitant problems, but it does not follow therefore that planning should be areawide. The report does not study in depth the reasons why Federal agencies and States do not use the established substate districts or areawide planning agencies. In other words, although the report does an excellent job of describing the need for more rational planning districts and agencies, it does not establish the case for areawide planning or for councils of governments."

From a New England areawide clearinghouse:

"The last sentence on the first paragraph on page 65 calls for OMB to develop standards for planning and require their adoption. I am unclear as to the nature of these standards. If they are broad guides of overall performance by planning agencies, they may be useful. But if they are detailed regulations mandating how programs to serve the local community are to be conducted, I think this idea is ill-conceived and unworkable. I can think of no one in Connecticut who would have any faith in the ability of OMB to become the guiding light in standards for planning performance. I also believe there would be wide opposition to this type of role for OMB on philosophical grounds."

From another New England areawide:

"... virtually all federally assisted planning programs are 'plan' or 'document' oriented, where the real long-term objective is 'process' or 'effectuation' oriented. I would submit that unless an applicant can clearly indicate how the results of the planning are to be utilized, then the conclusion of the project will be a dusty plan."

And another:

"While many federally funded planning programs were indeed established on a piecemeal basis, the constituency which was established was often built by State and local government, as much as by Federal agencies. We are all to blame on this score."

* * *

"... a point that is missed throughout the study: that is the role of local government in establishing and funding comprehensive areawide planning agencies. While the push for such agencies came from the Federal level ... individual towns actually formed and control the agencies. A reader

of the report, unfamiliar with how RPAs work, could easily assume that RPAs are agencies of the Federal and State government, when in reality, in most instances, they are considered, from a legal standpoint, units of local government."

Another:

"... the question is why do State, Federal, and local agencies tend to select the options which allow more agencies, more duplication and more dispersal of areawide planning authority. We speculate that in effect, functional agencies and levels of government share a common fear that any kind of strong, possibly critical, areawide planning agency will diminish or jeopardize their relative position in the decision making process."

* * *

"It has not been our experience that overlapping geographic boundaries were a major problem. For the most part this has been a minimum concern in developing and carrying out planning programs. The problem of overlapping scope of authority is much more difficult to solve."

From a Mid-Atlantic State Clearinghouse:

"It is our belief that the State is the logical unit to assume responsibility for interjurisdictional coordination of issues which are of greater than local concern."

* * *

"Regionalism means many things to many people. Regardless of its definition, some officials see it as necessary, inevitable, and desirable for the identification of regional problems and the planning and solving of these problems, while others see it as the end of local government. Still others see it as a means to by-pass State government and further direct control of local government by the National Government.

"Too often the dictates of Federal requirements design a program to fulfill a federally conceived image, rather than a local need."

From a Midwestern areawide clearinghouse:

"While we recognize the need for a more active posture on the part of OMB toward enforcement of the provisions of the Circular with its 'peer' agencies at the Federal level, we feel that the case-by-case resolution of complaints by OMB relative to compliance at the local level has worked satisfactorily in the past."

From a Northwestern city:

"...the report lacks any conceptual focus...it assumes coordination and comprehensive planning...are desirable, but it fails to get at the reasons why they fall short. In particular, the report fails to look at the legislative and political basis for the myriad of federally supported planning programs."

* * *

"This, then, should be the focus of the report. Do the multitude of uncoordinated federally assisted planning programs lead to wasteful or counter-productive outcomes with regard to solving "real" problems? It is not enough to say coordination will make things better. Coordination may not materially affect the results of particular functional programs."

* * *

"...Planning and implementation need to be linked...would recommend that GAO consider recommending that, regardless of the flow of planning assistance, its recipients be collectively responsible for producing a single plan or program for improvements that reflects locally determined priorities and requires Federal funding agencies to identify what program and project assistance will be available...less emphasis on the surface tidiness of arrangements, and more emphasis on some kind of integrated products, like a regional improvement program, leaving flexibility for local arrangements."

From the U.S. Conference of Mayors:

"...some serious reservations...First, such a procedure could lead to a decrease in the control that local government officials have over the plans...Secondly, this consolidation of boundaries for these planning agencies could allow for the consolidation of various jurisdictions, thus opening the door for the overlooking of the needs of a single city for Federal funding if the general area does not need that funding. And, third, the report suggests that A-95 coordination be made mandatory as a condition for receiving Federal funding.

"In spite of these reservations, we endorse the underlying purpose of the report as an effort to simplify tedious review procedures...recommend...following positive suggestions...a minimum impact test...for determining which expenditures have 'areawide significance'...a weighting system for the

composition of the comprehensive areawide planning body... (taking) into account such factors as percentage of population below the poverty level, concentration of population, and/or degree of racial concentration. Weighted factors would help ensure that the central cities would be represented fairly on the areawide planning body."

From the National Association of Counties:

"...five points which we consider to be major problems of the report: (1) The A-95 process is treated as a given; no alternative mechanisms are considered. (2) The report's emphasis is on the process and as a result bypasses examination of final product. (3) The report assumes that local governments can't coordinate with each other without guidance from the Federal government. (4) In the report's recommendations, no pressure is put on Federal agencies to reassess their working relationships with each other. (5) The report treats the issue of boundaries unrealistically and superficially."

* * *

"...our deep concern that the level of local input and involvement as recommended by the report, is inadequate. We feel that local involvement is vital to an effective system. Because of the increasing amount of Federal dollars flowing to the local level, localities should not merely be consulted or 'invited' to comment, but should have final approval as an inherent and working part of any regional system's machinery. NACO's extremely strong commitment to this principle is a pervasive theme..."

* * *

"The report's impressive charting of the flow of Federal funds ...ignores completely an important question, one we feel should be central to this evaluation: what is the ultimate effect, at the local level, on the delivery of services? Is the final product suffering because of this lack of coordination in the system? If so, how? And if so, shouldn't that be taken into account when making recommendations?"

* * *

"Although we strongly support coordinated planning, we oppose the Federal government's defining how to plan."

Listing of Federal Assistance Programs
Reviewed and Their Planning Components

<u>Catalog number</u>	<u>Program title</u>	<u>Planning components</u>
<u>Department of Commerce</u>		
11.302	Economic development planning assistance	To encourage multicounty districts to develop their planning capabilities, assuring effective utilization of resources in creating full-time permanent jobs for the unemployed and the underemployed.
11.418	Coastal zone management program development	To assist any coastal State in planning and developing a management program for the land and water resources of its coastal zone.
<u>Department of Health, Education, and Welfare</u>		
13.206 (note a)	Comprehensive health planning-areawide grants	To encourage areawide comprehensive health planning.
13.207 (note b)	Comprehensive health planning-grants to States	To provide financial support to administer or supervise the administration of the State's comprehensive health planning functions.
13.257	Alcohol formula grants	To assist States to plan, establish, maintain, coordinate, and evaluate effective prevention, treatment, and rehabilitation programs to deal with alcohol abuse and alcoholism.

a/Replaced by catalog program number 13.294, Health Planning - Health Systems Agencies

b/Replaced by catalog program number 13.293, State Health Planning and Development Agencies

<u>Catalog number</u>	<u>Program title</u>	<u>Planning components</u>
<u>Department of Health, Education, and Welfare (cont'd)</u>		
13.269	Drug abuse formula grants	To assist the States in the preparation of plans for planning, establishing, conducting, and coordinating projects for the development of more effective drug abuse prevention functions.
13.284	Emergency medical services	To provide assistance and encouragement for the development of comprehensive emergency medical services systems throughout the country.
13.609 (note a)	Special programs for the aging	To provide assistance to States and sub-State organizations for support of programs for older persons via statewide planning, area planning, and social services.

Department of Housing and Urban Development

14.203	Comprehensive planning assistance (701)	To encourage comprehensive community development (land use, etc.) planning at State, metro, nonmetro regional, and local government levels.
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Department of the Interior

15.400	Outdoor recreation-acquisition, development, and planning	To provide financial assistance to the States and their political subdivisions for the preparation of comprehensive statewide outdoor recreation plans and acquisition and development of recreation areas and facilities.
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a/Replaced by 6 programs of which catalog program number 13.633 provides planning as well as services.

<u>Catalog number</u>	<u>Program title</u>	<u>Planning components</u>
<u>Department of the Interior (cont'd)</u>		
15.904	Historic preservation	To prepare comprehensive statewide historic surveys and plans to preserve objects significant in American history.
<u>Department of Justice</u>		
16.500	Law enforcement assistance-comprehensive planning grants	To support required State and local crime control planning.
<u>Department of Labor</u>		
17.232	Comprehensive employment and training programs	To provide job training and employment opportunities for unemployed and underemployed persons and to prepare a comprehensive manpower plan.
<u>Department of Transportation</u>		
20.103	Airport planning grant program	To assist public agencies in planning individual airports and State, regional, or metropolitan systems of airports adequate to meet the needs of civil aviation.
20.205	Highway research, planning, and construction	To require and finance integrated land-use transportation planning within all urban areas of 50,000 or more people.
20.505	Urban mass transportation technical studies grants	To encourage sound planning of urban mass transportation projects in a program of unified or officially coordinated urban transportation system.

<u>Catalog number</u>	<u>Program title</u>	<u>Planning components</u>
<u>Water Resources Council</u>		
65.001	Water resources planning	To increase participation by the States in water and related land resources planning.
<u>Environmental Protection Agency</u>		
66.001	Air pollution control program grants	To help State, local, regional, and interstate agencies plan, develop, and establish programs for prevention and control of air pollution through implementation of ambient air standards.
66.426	Water pollution control-areawide waste treatment management planning grants	To encourage and facilitate the development and implementation of areawide waste treatment management plans in designated areas.
66.600	Environmental protection consolidated program grants	To enable States to coordinate and manage environmental approaches to their air and water pollution and solid waste problems including the preparation of a State plan.