John Wiley & Sons, 1958), pp. 26-27.
14. Harold Guetzkow, "Interagency Committee Usage," *Public Administration Review*, Vol. 10, No. 3, Summer 1950, p. 190.
15. Gulick and Urwick, *op. cit.*
16. The program is described in some detail in Allen Barton, *et al., Decentralizing City Government* (Lexington, Mass.: D.C. Heath/Lexington Books, 1977).
17. John Lindsay, "Program for the Decentralized Administration of Municipal Services in New York City Communities," Office of the Mayor, December 1971.
18. Community schools and elementary schools are not truly separate field services, but their relationship is more complex than different levels of the same field service. The elementary school principal reports to the community school superintendent, who is responsible to both the Board of Education and the local Community School Board. This relationship does not affect our findings because only one response category was used for public schools.
19. The number of factors extracted from a factor analysis is normally determined by the minimum eigenvalue specification. Following accepted conventions, only factors with an eigenvalue of 1.0 or greater were extracted.
20. Tom Burns and G. M. Stalker, *The Management of Innovation* (London: Tavistock Publications, 1966), pp. 5-6.
21. For an application of this approach to administrative duplication, see: Martin Landau, "Redundancy, Rationality, and the Problem of Duplication and Overlap," *Public Administration Review*, Vol. 29, No. 4, July/August 1969, pp. 346-358.
22. The seminal article suggesting that the multiplicity of political units may be necessary to satisfy a multiplicity of different interests is: Vincent Ostrom, Charles Tiebout and Robert Warren, "The Organization of Government in Metropolitan Areas: A Theoretical Inquiry," *American Political Science Review*, Vol. 60, No. 4, December 1961, pp. 831-842.

Toward a Theory of Policy Implementation: An Organizational Perspective

Robert S. Montjoy, *Auburn University*
Laurence J. O'Toole, Jr., *Auburn University*

Numerous studies have documented the difficulty of converting public policy into appropriate action.[1] While problems usually appear during implementation, some of them may be predictable from the nature of the policies themselves. If so, prospective policies could be analyzed in terms of their implementability. Unfortunately, the necessary predictive theory of implementation does not exist (Anton, 1978, p. 186). In this paper we explore one approach to such a theory by applying propositions derived from the organization literature to a major category of implementation problems. We illustrate the generality of our ideas with a variety of reported cases.

The fulfillment of formal policies, such as statutes or administrative regulations, requires that someone do something (or stop doing something) and that the action have the desired effect. We shall refer to decisions made in carrying out a policy as *implementation* and the effect on the ultimate target as the *impact*. This distinction seems useful because problems in these areas are likely to yield to different sorts of analysis. If a well-implemented highway program should fail to alleviate traffic problems, the fault would lie in our knowledge of the connection between highways and traffic, and not in our inability to construct highways.

Governmental programs are normally implemented by organizations, so it may be useful to conceptualize implementation as an organizational problem, one to which organization theory applies. Two observations follow. First, when a new mandate is assigned to an established agency the new patterns of individual activity required may compete with old ones. The resulting intra-organizational problems will be discussed below. Second, many mandates require the participation of more than one agency and thus create situations in which the traditional institutional tools for eliciting and coordinating efforts are not controlled by a single actor.

Laurence J. O'Toole, Jr. is associate professor in the Department of Political Science, Auburn University. He has taught previously at the University of Virginia and served as associate director of the public administration program there. He is a student of organization theory as well as public administration and democratic theory.

Robert S. Montjoy is associate professor in the Department of Political Science and assistant director of the Office of Public Service and Research, Auburn University. He previously served at the University of Virginia. His research interests include election administration, political behavior, and public administration and organization theory.

(See Wilson and Rachal, 1977.) Therefore, inter-organizational implementation may present qualitatively different problems. In this paper we focus only on intra-organizational implementation since that would seem to be a first step for almost any policy.[2] The following section explores the possibility of predicting agency responses to external mandates from the interaction of organizational and mandate characteristics.

Toward a Theory of Intra-Organizational Implementation

We assume that agencies are populated with individuals who have their own values and seek to attain these within the limits of human abilities to absorb and process information (Simon, 1957). Because agencies recruit people from similar background and subject them to similar stimuli, a sizable portion of an organization's membership often shares such preferences and beliefs. For simplicity we shall refer to those who normally get their way in the direction of agency activities as the dominant coalition.[3] A consistent set of preferences and beliefs about cause and effect relationships exhibited by such a group will be termed the goals and world view, respectively, of the agency.

However, the ability of the dominant coalition to direct agency activities is not unfettered. One source of constraint is the set of external mandates. These limit legal discretion, but we shall argue that the intrusion of other factors may alter the practical effects of such mandates in some cases. A second and sometimes overlooked source of constraint on any pattern of new activity is the set of existing routines. Routines are useful for efficient performance, but they lead to some inflexibility since they are costly to establish or change. The costs of such change can be borne by organizations which have resources sufficient to the task. Money, staff, expert knowledge of the new routine, time, and authority are some such valuable resources.[4]

Where do agencies get such resources? Some organizations might possess sufficient slack resources to make changes in selected routines without jeopardizing other activities. However, we assume in the following pages that agencies either do not have sufficient slack resources or, as Wildavsky (1974) documents, do not choose to reveal them. (This assumption could limit the applicability of the analysis somewhat, but let us reserve judgment on this matter until the entire theory is presented.) Therefore, new resources must come from some external source. The usual example is that a legislative body requires an agency to undertake a program and supplies funds for it to do so. Although we recognize that appropriations are handled separately we shall speak of the presence (or absence) or new resources as a characteristic of the mandate.

We are now in a position to suggest some of the different effects which external mandates may have upon administrative organizations. Only two characteristics of mandates are used: (1) their specificity and (2) the amount of new resources which accompany them. Although one can conceive of each characteristic as a continuous variable, the primitive state of our theory and the crudeness of our measurements make simple dichotomies more appropriate. Thus mandates may be either specific or vague as to the expected administrative actions and they may or may not provide new resources. These two dichotomies yield four possible combinations as illustrated in Figure 1.

Figure 1
Characteristics of Mandates
Description of Expected Activity

Provision of New Resources	Vague	Specific
Yes	A	B
No	C	D

These different types of mandates may provide different amounts of constraint upon (or discretion for) the dominant coalition, all other things being equal. If vague mandates provide more leeway than specific mandates and if new resources help organizations to overcome the constraints of existing routines, then we would expect the mandates in Type A of Figure 1 (vague with resources) to create the highest degree of discretion among organizations with equally ingrained routines.

How might this opportunity be used? Because the interpretation of policy is traditionally a management prerogative, one would expect the organization's leadership to have the first opportunity to deal with the mandate. If the leadership has a coherent goal and/or world view, we would expect the policy to be interpreted in that light. In the absence of a clear purpose on the part of leadership, it is possible that the opportunity to direct agency activity would be passed on to other actors.

Mandates which fall into cell B should carry more constraint than those which fall into cell A. Type B mandates provide new resources and, thus, an opportunity for organizational change, but presumably the nature of any change would be tightly governed by a specific external directive. Thus, we would expect existing organizations provided with type B mandates to establish new routines for the undertaking of prescribed behavior. If the new activities are closely integrated with each other and sufficiently different from old routines, an organization might establish a separate sub-unit for their accomplishment. With type B mandates we would expect the goals and world view of the dominant coalition to be less important than with type A mandates. There might be start-up costs and delays as new technology is developed, but in the absence of inter-organizational or impact problems, implementation should be relatively straightforward.

Type C (vague without resources) mandates should also provide more constraint than type A mandates. In this case the policy statement allows room for interpretation, but the organization is constrained by its own routines. In the absence of resources we would expect little voluntary organizational change. Of course, it is possible that an external source might apply sanctions to the organization (such as the threat of reductions in total appropriations). However, for the threat of sanctions to influence the decision of an organization, some degree of specificity must be present in the mandate. Activities subject to penalty must be identifiable if agencies are to choose to avoid them. The addition of specificity would convert the policy into type D. Therefore, we would expect little new activity under type C mandates. One way in which an agency can minimize new activity and still claim some compliance is to interpret the demands of the new policy to be quite similar to its existing operations. Because of their vagueness, type C mandates should elicit this ploy more often than type D mandates (discussed below).

. . . three reports all document agency inaction in response to a mandate . . . there was evidence in each case of the leadership's unwillingness or inability to impose a single interpretation on the mandate. This result does . . . belie the common assumption of bureaucratic imperialism.

When a mandate falls into category D (specific without resources), the constraints of both the existing routines and a specific policy statement apply. Therefore, we would normally expect such mandates to offer the least discretion of all. However, in some cases the constraints may not work in the same direction. If an organization is working at its practical capacity, the resources necessary to satisfy the new mandate will have to come from existing activities. Since existing routines can usually be justified in terms of some official purposes, a new mandate may be in competition with old mandates for scarce organizational resources. Administrators faced with a larger number of specific requirements than they can satisfy must consciously or unconsciously choose among them. Therefore, we would predict that at some, yet undefined, point additional specific mandates without resources (or clear indications of priority relative to existing activities) will increase discretion.

The way in which the discretion is used depends, we hypothesize, upon the strength and direction of forces within the organization. Perhaps the simplest situation is one in which existing routines are supported by the goals and world view of both the leadership and the rank and file. Under such circumstances a new mandate which competes with existing routines but which has no clear claim to high priority will probably be resisted by the organization. This resistance will rarely take the form of outright defiance. Such devices as interminable delays and "gun decked" reports (i.e., reports written to give the appearance of organizational activity and progress) serve a similar function and are less dangerous. Perhaps the most promising avenue for an organization in these conditions is to make a token effort, record its difficulties, and use the result to argue for more resources in the next budget cycle.

The situation is different when the organization is not unanimous in its support of existing routines. Then an external mandate may be used as a resource. Perhaps the most obvious example is the case in which some elements of the leadership would like to institute a new technique but lack the authority to do so. An external mandate requiring the organization to use the new technique might shift the balance, although some elements of the organization might continue to resist. However, it is not necessary that an external requirement coincide precisely with the goals and/or world views of any elements with the organization. A new mandate could be the catalyst for the formation of a new dominant coalition; or existing elements, usually those in positions of leadership, might use the requirements of a mandate to accomplish some totally unrelated purposes. In any case it is often useful for such groups to point outside of the organization and say, "They are forcing us to do this."

Thus we have four types of mandates and associated sets of intra-organizational implementation problems. It should be noted that the above propositions predict classes of problems, not particular outcomes in particular cases. There are far too many idiosyncratic features to expect much more precision at this stage. Nevertheless, if our reasoning is correct, there should be tendencies observable over a number of cases for certain types of problems to be associated with certain types of mandates. We turn now to a consideration of some relevant empirical evidence.

The Propositions Applied

The prevailing mode of empirical inquiry on the subject of implementation has been the case study. The results of case studies tell us what happened in particular situations, and they frequently suggest a number of reasons why. Unfortunately, it is difficult to link these studies with a general theory of implementation for several reasons. First, they are not randomly selected; indeed researchers are frequently attracted by the unique features of particular cases. Second, much research is purely inductive, and those studies which do begin with some theoretical notions rarely share the same concepts. Finally, the rules for selecting and interpreting information are usually not clear within single studies and certainly not uniform across studies. Nevertheless, given the complexities of implementation problems and the resources required to trace the actions (or inactions) relevant to even one mandate, case studies will in all likelihood continue to provide the principal data base for theories of implementation.

So far in this paper we have been able to avoid generalizing from particular cases because our proposi-

tions are based upon some general assumptions about the behavior of people in organizations. [See Downs (1967), Tullock (1965), and Clark and Wilson (1961) for similar approaches.] Yet, we must still ask whether these propositions help us to understand real implementation problems. For this purpose we turn to a secondary analysis of published cases. [See Lowi (1972) and Yin and Heald (1975) for examples of such analysis.]

A disadvantage of secondary analysis is that the original authors had no special reason to seek or report information in the theoretical categories which one wishes to use. This problem is less severe if the required information is commonly reported for other purposes and if one has a sufficiently large number of cases to discard those which do not provide all that is needed. But where does one find such a large number of implementation studies? Fortunately, the U.S. General Accounting Office (GAO) now issues approximately 1100 reports per year, a sizable proportion of which are directed at the question of how some federal agency has implemented a congressional or high-level executive mandate. Our data base for the study of intra-organizational implementation problems was drawn from a sample of 191 such GAO reports.[5]

From our perspective it appears that the surest way to avoid intra-organizational implementation problems is to establish a specific mandate and provide sufficient resources. . . . This conclusion is consistent with the popular lore that the best way to insure the proper administration of a new program is to create a new agency.

Our procedure was to read and look for evidence related to our theoretical concepts. We attempted to classify mandates on the basis of resources and specificity. In the case of the former, we simply divided policies into two categories of resources/no resources. The most frequently cited resources were money and personnel. GAO usually noted such items when they were available and the agencies (in their responses to the GAO analysis) were quick to point out any lack of resources. Of course such a categorization avoids the interesting question of how many resources are adequate for implementation. Nevertheless, in this beginning study we decided to utilize a fairly straightforward dichotomy. We treated specificity similarly. GAO often reported mandates which merely prescribed some desired future state of affairs or tasked agencies with developing programs for some general problem. These we labeled vague. Other policy statements set forth particular procedures and standards. These we categorized as specific. We performed no independent analysis of the contents of the mandates but relied upon GAO's description. In some cases GAO did not provide sufficient information about the mandate for us to classify it. In these instances we did not include the case in our analysis. In future work along this line it would be useful to develop more refined measures of this concept.

Organizational routines were frequently difficult to identify. (Of course, with policies of types A and C there were no mandated routines to identify.) In a few instances, both existing and mandated routines were clearly described. In other cases GAO or agency comments could be used to classify the organizational result of the mandate without clear descriptions of existing routines. For example, agencies sometimes justified their inaction on type D mandates by arguing that the prescribed routines conflicted with other requirements to which the agency assigned a higher priority.

Evidence regarding goals and world views came primarily from statements of agency officials (or GAO interpretations of such statements) concerning their values, their definitions of problems, and their beliefs about means-ends relationships. For example, one report indicated that the Department of Housing and Urban Development (HUD) was not requiring Environmental Impact Statements for many projects which, according to GAO interpretations, should have had such reports. In the process of the study GAO representatives talked with "area and insurance office personnel who were responsible for preparing the clearance. . . . They said that, if a project had the beneficial impact of providing a decent home and suitable living environment—HUD's major goal—this would normally outweigh any adverse environmental impacts" ("Environmental Assessment," p. 31).[6] Although this statement did not result from a carefully drawn survey of HUD personnel, we took it as being representative of a goal within the organization.

Many of the cases were not relevant for our purposes and are, therefore, excluded from further consideration here. No case was rejected because it did not conform to our theoretical expectations.[7] Of the 58 relevant cases which contained sufficient information, some reported more than one impact or implementation difficulty. Therefore, we were able to identify 79 separate problems which fell into the following categories: 35 impact problems, 20 cases of inter-organizational implementation difficulties, and 24 examples of intra-organizational implementation problems. Figure 2 displays the intra-organizational cases classified by types of mandate and implementation result. The following sections describe the cases which fall into each cell.

Type A Mandates

According to our previous discussion, new resources permit new activities on the part of an agency, and a vague mandate gives the dominant coalition an opportunity to focus those activities in accordance with its own goals and/or world view. Where agencies have used this discretion one would not expect to find GAO complaints about a lack of agency action, but rather about the direction of the action. Of the seven type A cases in the sample of GAO reports, four of them coincided generally with this expectation.

A discussion of the "Great Plains" case is illustrative. The Great Plains Conservation Program (GPCP) was established in 1956 "to help combat climactic hazards in

Figure 2
Distribution of Cases
Implementation Results

	Displacement toward goals, world view	New routines, new subunit, start-up difficulties	Displacement toward existing routines	Resistance, backlogging, refusal to implement	Other
Resources and General Mandate (A)	Government Printing ADP Great Plains 8(a) SBA Program				Rural Development Oil and Gas Law Enforcement Education
Resources and Specific Mandate (B)		MESA Supplemental Food HMO Head Start Land Acquisition		Flood Prone	
No Resources and General Mandate (C)			Non-Fuel Minerals Uniform Treatment of Prisoners Audit Upward Mobility		
No Resources and Specific Mandate (D)				Employment Services Properties Waste Water Plants Loan Accounting State Information Environmental Assessments HUD 236	

the Great Plains." The Soil and Conservation Service (SCS) was charged with providing technical and financial assistance to "farmers, ranchers, and other landowners and operators" who wanted to engage in soil and water conservation. As GAO noted, "GPCP's authorizing legislation does not specifically restrict the types of land that can be treated or the types of conservation practices that can be established with GPCP assistance." The program's total authorization was $300 million, of which $156 million had been obligated by the end of the 1972 fiscal year (pp. 1, 11).

According to GAO's investigation of the legislative history of the act, the money was to be used to initiate conservation practices connected with converting and reseeding formerly unusable land. Some of the funds were spent for that purpose. However, the SCS spent almost as much money on "cropland terracing, irrigation, and other conservation practices which were generally authorized by the law but which, according to SCS officials, were *not* corollary to conversion and reseeding" (p. 14, emphasis in original). "SCS officials advised ... that *SCS considered* practices, such as terracing on suitable cropland, to be just as important as converting unusable cropland or reseeding badly depleted rangeland" (p. 14, emphasis added).

In a similar case, "ADP," the GAO differed with the Office of Management and Budget over the use of the Automatic Data Processing Fund. In both instances the GAO used legislative history to add specificity to a vague mandate and then criticized the implementing agency for interpreting the mandate in accordance with its own purposes. In the other two cases discretion was demonstrated by the fact that agencies changed their own definitions of mandates over time. The Government Printing Office repeatedly used its authority to define costs so as to bring in more resources from private buyers ("Government Printing"). The Small Business Administration shifted its efforts under section 8 (a) of the Small Business Act "from hiring the unemployed in ghetto areas to developing successful firms owned by disadvantaged persons" ("8(a) SBA Program": 2) and it "established goals for the program in terms of the number and dollar amount of contracts awarded rather than in terms of successful program completions" (p. 33). In each of these four cases the agency's actions were within the scope of its formal mandate, if not the intent of the mandate's authors. Each agency used its discretion to undertake new activities which appeared to be consistent with its goals.

However, the remaining three cases involving type A mandates depart from this pattern. In "Rural Development," "Oil and Gas," and "Law Enforcement Education" GAO's criticism was aimed at the lack of agency action rather than the direction of that action. For instance, the Rural Development Act of 1972 provided the Department of Agriculture (USDA) with resources and broad authority. But in this case the chief goal of agency leadership seemed to be to devolve important decision making to state and local governments as a matter of general philosophy. That is, USDA leaders did have an opportunity to exercise influence upon the new program, but they chose to do so procedurally by

donating discretion to others. The general department policy was that "federal implementation of the Act will be consistent with the President's policy of decentralized decision making and administrative responsibility which gives fullest possible consideration to State and local rural development goals and priorities" ("Rural Development": 14).

In the "Oil and Gas" instance, a relatively young organization, the Energy Research and Development Administration, was provided with funds and a mandate to develop a demonstration program to stimulate commercially viable innovations in the oil and gas industry. But ERDA's leadership seemed to have no clear goals or world view and had produced no "effective management plan" to convert the general mandate into a set of specific routines. As a result of this factor and some impact problems, very little has been done to implement the policy (p. iii).

The Law Enforcement Education Program provides a somewhat different example. Here the Law Enforcement Assistance Administration (LEAA) delayed implementation of a type A policy for several years. The delay, however, seemed to result less from a lack of any leadership goals or world views than from disagreements within the leadership coalition itself coupled with frequent changes in the composition of key elements of that group. "Management indecision" was the consequence of debate within the LEAA. At one point the associate administrators of the agency vetoed a completed plan (the "centers of excellence" idea for criminal justice education) which had the support of the departing administrator. "At least four major staff and administrative changes between 1968 and 1973" took place. "Each time, a different person was given overall responsibility for the program" ("Law Enforcement Education": 40, 41-42). Under such conditions it is not surprising that execution of the mandate was delayed repeatedly.

These last three reports all document agency inaction in response to a type A mandate. However, there was no evidence of constraint. Rather, there was evidence in each case of the leadership's unwillingness or inability to impose a single interpretation on the mandate. This result does not conflict with the argument that type A mandates provide dominant coalitions with an *opportunity* to exercise discretion, but it does belie the common assumption of bureaucratic imperialism. Apparently, the Department of Agriculture did act in accordance with its goal, but its principal goal was to devolve decision-making responsibility. For the other two cases we might suggest, in retrospect, that where agency leadership is not united in purpose a grant of broad discretion may actually exacerbate indecision. Thus we must include inaction as an important option in the set of possible responses to type A mandates.

Type B Mandates

As do the policies discussed above, type B mandates provide resources for organizational change and new activities. However, type B mandates leave less room for interpretation, so we would expect the designated agencies to undertake their prescribed activities with little displacement or resistance. If no other problems occurred we would also expect to find few reports on type B mandates since GAO does not generally investigate success stories. However, inter-organizational or impact difficulties could still exist. Furthermore, there should be some delays and other start-up costs as agencies develop new routines. If our reasoning is correct, the GAO reports on type B mandates will tend to document problems of these types and not of displacement or resistance.

Of the cases listed for type B mandates in Figure 2, "MESA" provides the best example of such start-up costs without significant displacement or resistance. The Federal Coal Mine and Safety Act of 1969 established fairly specific procedures and goals for the reduction of respirable dust in coal mines. The act required the Departments of Interior and of Health, Education, and Welfare to prescribe the manner and intervals for dust sample collection; charged Interior with analyzing the samples, and established a specific quantitative measure of dust concentration as the goal of the policy. In 1974 funds were appropriated and the Mine Enforcement Safety Administration (MESA) was established within Interior to implement the policy. By the time of the report in 1975 MESA had undertaken standard-setting, monitoring, issuance of violation notices, and collection of fines. GAO found fault with some of MESA's procedures but agreed that air quality in the mines had improved.

This case appears to be fairly typical of situations in which efficient and effective routines are not known, or for other reasons are not available, at the start of implementation. MESA's problem was largely technical; optimal procedures and equipment for collecting and analyzing dust samples had to be developed. In another instance, the Food and Nutrition Service of the Department of Agriculture delayed implementation of the Special Supplemental Food Program while attempting to acquire the expertise and develop procedures necessary to perform the medical evaluations demanded by the mandate ("Supplemental Food"). These cases illustrate the importance of technology in start-up costs.[8] While there are generally difficulties associated with installation of any new routines, the problems are compounded when the organization must invent new procedures as well. Since agencies are rarely afforded the luxury of research and development time, the result tends to be a trial and error implementation which may make the organization appear ineffective even in the absence of other problems.

At least one agency appears to have institutionalized its start-up problems, although the motivation seems to be a result of political as well as technical considerations. GAO criticized the Department of Health, Education, and Welfare for delay in issuing the regulations required by the Health Maintenance Organization Act ("HMO").[9] HEW responded:

> The Department made a very concerted effort to assure an opportunity for participation in development of the regulations by the existing health care providers as well as the health care industry. We believe that the process followed was appropriate for dealing with special interest groups (p. 86).

In the other cases there was less evidence of start-up costs. "Head Start" cited much progress with minor administrative difficulties. In "Land Acquisition" the National Park Service had designed its own mandate for Congressional approval and, as one would expect, implementation was straightforward. Furthermore, despite its delay in issuing regulations (in "HMO") HEW received many applications from prospective health maintenance organizations. By correctly administering the specific requirements of the act, the department disqualified numerous applicants and thus did not utilize all appropriated funds. We would classify this result as an impact problem and GAO agreed that the agency was not at fault (p. 39). However, these start-up problems resulted in more serious difficulties later on. "Although HEW had some valid reasons for not allocating all those funds, such underspending placed it in an untenable position for justifying increased appropriations for later fiscal years" (p. 33).

Our propositions . . . suggest that intra-organizational implementation problems may be both pervasive and somewhat predictable. Furthermore, . . . both intra- and inter-organizational implementation difficulties are fairly widespread.

One case, "Flood Prone," produced mixed results with some evidence of backlogging; the Flood Insurance Administration had only "moderate" success in promoting the National Flood Insurance Program. Part of the problem appeared to be inter-organizational but part was attributed to a lack of sufficient staff. Our simple dichotomy of variables does not take into account the fact that some resources may not be sufficient.

With the exception of this last case, all the type B cases show evidence that agencies had taken action, and there was little dispute about whether the action was in the appropriate direction. While there is evidence of some start-up difficulties, these are to be expected when organizations initiate new activities.

Type C Mandates

Mandates of type C are vague and thus allow considerable room for agency interpretation. However, unlike type A mandates they do not provide additional resources to change old routines or add new ones. Therefore, we have hypothesized that organizations which are unable or unwilling to commit slack resources will tend to be bound by their own routines. The result should be little new action. However, the vagueness of the mandate may permit an organization to claim that its existing activities, or slight modifications thereof, constitute an appropriate response.

"Non-Fuel Minerals" provides an example. Congress enacted the Mining and Minerals Policy Act (P.L. 91-631) in 1970 to provide the Department of the Interior with a mandate to develop a long-term government policy on non-fuel minerals. As the Senate report at the time of passage indicated, "This policy is designed deliberately in general terms, recognizing the need for flexibility" (quoted in "Non-Fuel Minerals": 3). No funds or new budget authority were provided.

What happened during implementation? The GAO reports:

> Although Interior recognizes that the . . . Act . . . provides basic legislative guidance which can be used to develop a national non-fuel mineral policy, it maintains that all of its programs further the mineral policy. Interior also argues that no specific change in departmental operations was or is required because no new authority or funding is provided by the act. In summary, Interior's approach has been to regard the act of 1970 as a restatement of departmental traditional responsibilities for such functions as research and development, information gathering, and geologic investigations (p. 6).

In addition, the GAO interviewed individuals at several locations in the organization and found virtually no change in behavior patterns. "Several Interior officials in headquarters, at the Bureau of Mines, and USGS [U.S. Geological Survey] field installations told us their activities did not change as a result of the act" (p. 8). In this case, then, evidence indicates clear displacement of the mandate into existing routines during implementation.

The remaining cases fit the expected pattern in that little or no action was taken, but the evidence on the impact of the mandate's vagueness varies from case to case. In "Uniform Treatment of Prisoners" the agency clearly disagreed with GAO over the requirements of the mandate: "While the Department of Defense concurs in the GAO conclusion that differences exist between the services in their correctional programs, it is not our view that the degree of uniformity intended by the Correctional Facilities Act requires that the programs for each service be identical" (p. 48). Another case, "Audit," cites several agencies for not setting up internal audits, as required by the Auditing and Accounting Act of 1950, and while no agency argued that inaction was an appropriate response, the GAO did explicitly recognize a lack of guidance as a reason for inaction. In "Upward Mobility" the GAO found that 10 of 19 agencies surveyed had established no significant upward mobility programs in response to Executive Order 11478. The remaining nine agencies had taken no action in some areas which GAO defined as necessary and had taken insufficient action in others.

Type D Mandates

Type D mandates (specific with no resources) present a problem for our analysis because of its reliance on

GAO reports. We have already argued that discretion is created when the number of specific requirements exceeds the organization's capacity and no order or priority is established by the mandating authority. Unfortunately for our purposes, one potential use of that discretion did not occur in the sample of GAO cases. There was no evidence of elements within an agency attempting to use a mandate to reorder organizational priorities, i.e., to take resources away from other programs. Perhaps this lack of evidence indicates that such events do not take place, but an equally plausible explanation is that GAO reports are unlikely to pick up such internal changes, in part, because they result in successful intra-organizational implementation for the new mandate. Thus, we are left with the other use of discretion–the relegation of the mandate under study to a low priority. These cases should be similar to these involving type C mandates with the chief difference being that agencies have more difficulty concealing inaction in response to type D mandates.

We had expected to find agencies with fairly clear ideas of the public good and how to obtain it through governmental action. . . . We did find evidence of such an assumption, but we also encountered situations in which an agency had no coherent idea of what it should do with discretion granted by the mandate.

A useful example which illustrates some of the implementation difficulties possible with type D policies under conditions of organizational consensus is the Department of Labor's Vietnam-Era Veterans' Employment Services program ("Employment Services"). Executive Order 11598 (June 16, 1971) and the Vietnam Era Veterans' Readjustment Assistance Act of 1972 established a number of specific procedures designed to provide jobs for veterans through the existing network of state and local employment offices. Financial resources were not provided, and though the mandates clearly required some staff increases for those offices, such staff would have to be paid from existing resources. For all practical purposes, then, no resources were provided.

The case is complex and could be used to make a number of points about implementation, but we chose only one mandated activity for examination here. The 1972 Act required the state and local offices of employment service agencies to follow an unambiguous decision rule in their referral of job applicants to job opening before any non-veterans. In these agencies, available, all qualified veterans were to be notified of the opening before any nonveterans. In these agencies, however, the pre-existing routine had not required bureaucrats to search for all qualified applicants. Instead, because employers pressed for quick referral and the costs of search through poorly-kept office files were high, the agencies had merely considered those applicants physically present in the office at the time of employer inquiry. This behavior pattern had been reinforced by another routine which served as a method of evaluating job performance (and thus, presumably, distributing rewards) for the employment service workers: "a primary measure of employment service performance has been job placements" (p. 4). Thus routines, and incentives which appealed to rank and file goals, combined in the employment service to produce unified organizational pressures in support of existing patterns.

The new mandate was not implemented as specified. While it seemed that the organization members were sympathetic to the goals intended by the policy makers in this case, the demands of type D policy resulted in two implementation problems. First, though the new policy specifically required reassignment of staff to specialize in problems of veterans' employment, only a few such reassignments had been accomplished at the time of a GAO study. Instead, the employment service organization argued for new resources to reduce the hiring backlog. Second, the specific referral rule of the new policy was violated. The rule actually used was one which fit with existing routines, though it incorporated some of the intentions of the policy makers. When a job opening was relayed to the employment service, the search for qualified applicants took place in the following order: (1) waiting-room veterans, (2) waiting-room non-veterans, (3) veterans in the files, (4) non-veterans in the files. As this case illustrates, organizational support for existing routines at the time of a new type D policy statement can result in various manifestations of resistance or overt modification of required practices.

Most of the remaining cases fit the expected pattern quite nicely. In "Properties" the maintenance of single-family residences acquired by HUD under the National Housing Act suffered because realty specialists were almost totally involved in other duties. "Waste Water Plants" reports that effluent standards set by the Federal Water Pollution Act were not being met at some military bases because, as DOD officials explained: "Operation and maintenance funds have been very limited in recent years and base commanders have been forced to use them only for the highest priority items–such as costs associated with the mission of the base" (pp. 11-12). By the time of a 1976 report ("Loan Accounting") the Farmers Home Administration had not developed and submitted a new accounting system designed as required by the Budget and Accounting Procedures Act of 1950 and promised after a 1970 GAO study. In "State Information" GAO noted that federal agencies were not reporting grant information to the states as required by the Intergovernmental Cooperation Act of 1958 since "processing of SF 240's [report forms] were not integrated with the processing of grant applications. . . . Because the SF 240's have little value to the Federal agencies, they have low priority" (p. 21). Finally, HUD officials explained to GAO that "the environmental clearance process (under the National Environmental Protection Act of 1969) conflicted with HUD's priorities which are oriented toward and emphasize accelerated project approval ("Environmental Assessment": p. 31).

We close this section with a case which fits our predictions, but only after forcing us to refine our notion of resources. The HUD 236 Rental Assistance Housing Program ("HUD 236") at first would seem to be anything but a type D policy, since this program resulted in the expenditure of $1.3 billion between its establishment in 1968 and the first quarter of 1976. The policy calls for rental subsidies for specific categories of tenants under certain conditions. The important point is that, though the program provides resources for external clients, it allocates no funds or staff directly for the implementation of the program itself. HUD's field offices, which are responsible for program monitoring and oversight of recertification of eligible tenants, reported predictable problems in the execution of the mandate. While a large number of those HUD offices queried asserted that the prescribed monitoring techniques were effective, those same offices made only 42 per cent of their required number of on-site visits. HUD claimed that staff shortages and other priorities limited its ability to implement this program effectively. Ironically, because of the design of the Section 236 mandate, one of the most expensive federal domestic programs has been shackled with insufficient resources for the implementation of effective safeguards.

Conclusion

The analysis reported in the previous section must be considered exploratory. Certainly, it does not provide a rigorous test for our propositions. The cases which we surveyed are not a random sample of all congressional mandates or even of all GAO studies, so we have no statistical basis for determining how representative they are likely to be. Furthermore, because each case is complex and because the original researchers were not using our concepts, the classification of each case may not be entirely unambiguous—even though we tried to be conservative in our interpretations and we eliminated many studies on the basis of insufficient evidence. On the other hand, the cases illustrate some of the intra-organizational implementation problems associated with external mandates, and they indicate that results consistent with our predictions can and do occur in a variety of federal agencies. The analysis of GAO cases has suggested ways in which to refine our propositions and we feel that the results permit somewhat greater confidence in our conclusions than would be possible from pure deduction or post-hoc generalization from a single case. Thus, we would like to consider this exercise a useful step in the construction of a theory of implementation.

Even in its current form our fledgling theory has some implications for analysts and policy makers. Our propositions were deduced from some rather common assumptions concerning human limitations and the nature of bureaucracy. They suggest that intra-organizational implementation problems may be both pervasive and somewhat predictable. Furthermore, the cases which we surveyed indicate that both intra- and inter-organizational implementation difficulties are fairly widespread. Of the 79 implementation and impact problems which we were able to classify only 35 fall in the impact category. Therefore, it may not be enough for analysts to ask whether certain government actions will have the desired effect. It is also important to ask whether the desired set of actions can be instituted in the first place. In other words, it might behoove us to analyze prospective policies in terms of their "implementability."

From our perspective it appears that the surest way to avoid intra-organizational implementation problems is to establish a specific mandate and provide sufficient resources (type B). It is true that we found some start-up problems with type B mandates, but, at least, there was new activity directed toward an externally specified goal. This conclusion is consistent with the popular lore that the best way to insure the proper administration of a new program is to create a new agency. Indeed, our theory predicts that an existing organization will often create a new unit to handle a type B mandate even in the absence of specific requirements for it to do so. However, the attractiveness of type B policies is partially an illusion caused by our concentration on *intra*-organizational problems. *Inter*-organizational problems arise largely from the difficulty of coordinating the activities of several different units, each of which has its own goals and established routines. The creation of a specialized unit to handle a type B mandate will increase the number of agencies dealing in a certain area and may increase the coordination costs for the new mandate and for other, existing programs. Thus, we have a dilemma: a solution to an intra-organizational problem may exacerbate an inter-organizational problem.

Perhaps the ideal solution would be to use an existing agency which is already well-suited to the proposed mandate on the basis of routines, goals, and world views. Unfortunately, the potential for such an ideal match between organization and policy is probably quite rare. Furthermore, it may be very difficult for policy makers to know in advance how well the procedures for a new program will dovetail with existing routines. Very specific inquiries during the policy formation stage, in legislative hearings, for example, might be helpful. Of course, there are undoubtedly situations in which the policy maker desires to create a new agency for reasons entirely divorced from the implementation of the policy—symbolic effect, for example. We can only suggest that knowledge about how policies can be implemented would be a useful tool for policy makers to possess.

In many cases policy makers may lack the time or expertise to develop specific procedures. If they are still willing to commit resources to a project the result can be a mandate of type A (vague with resources). Our propositions suggest that under such circumstances policy makers should pay particular attention to the goals and world view of the organization tasked with implementation. The cases which we reviewed generally

support this admonition with one important qualification. We had expected to find agencies with fairly clear ideas of the public good and how to obtain it through governmental action. Therefore, we had anticipated that type A mandates would be displaced in the direction of organizational goals and/or world views. We did find evidence of such displacement. But we also encountered situations in which an agency had no coherent idea of what it should do with discretion granted by the mandate. The results included inaction, uncoordinated action in the face of time pressure to commit resources quickly, and the devolution of discretion to other actors. These outcomes provide further reason for policy makers to consider what, if any, goals and world view are characteristic of an organization about to be given a type A mandate.

Mandates of types A and B both require new resources, but resources are not always available. Therefore, it is important for policy makers to consider the consequences of mandates without resources. The arguments of this paper suggest, and the evidence tends to support, the conclusion that type C mandates (vague with no resources) tend to be displaced in the direction of existing routines. Unless policy makers can locate an exceptionally responsive organization with slack resources they should not expect to generate much new activity with a type C mandate. One option is to develop very specific guidelines thus converting the policy statement into a type D mandate.

We have argued that type D mandates (specific with no resources) frequently create discretion by adding requirements which exceed the organization's capacity to perform. One suggestion which comes from this conclusion is that such a mandate be accompanied by a clear indication of its priority relative to other requirements placed upon the organization. Furthermore, it may be necessary to employ rather strong sanctions. Changing routines is costly and if the cost cannot be borne with new resources it may be necessary to pressure the agency into absorbing the cost.

The problem is less difficult when some elements of an organization do not support existing programs or procedures. In such cases a specific mandate may serve as a catalyst or a resource. This conclusion suggests a modification of the familiar prescription to get a good leader and give him or her plenty of authority and discretion. It is not always possible or desirable to grant sufficient authority (especially when control of employment is removed from the agency) and a specific mandate can also serve as a resource rather than just a constraint.

Finally, we should note that it is important to consider the potential use of resources. The "HUD 236" case illustrates the fact that large sums can be allocated without providing any resources for the implementing organizations. Yet, our propositions suggest that where new routines are required some resources must be expended for successful implementation. One might assume that organizations would automatically divert sufficient amounts of their own resources to control large sums of money. However, the "HUD 236" case provides a negative instance for this assumption. It may often be the case that the allocation of additional funds for implementation could increase the net efficiency of an entire program.

In closing this section we wish to reemphasize the tentative nature of our analysis. If this paper accomplishes anything it should demonstrate both the potential utility of a theory of implementation and the difficulty of creating one. It would be useful to refine these concepts, develop better measures, test the applicability of our assumptions concerning ingrained routines and the lack of slack resources, and check the effects of other variables. We hope that our suggestions may stimulate interest along these lines.

Notes

1. Notable in this regard are such efforts as Bailey and Mosher (1968), Derthick (1972), Pressman (1975), Rose (1977), Weatherley and Lipsky (1976), Williams (1975), Bardach (1977), and Pressman and Wildavsky (1973).
2. We are well aware that stable patterns of interaction exist across organizational boundaries, but this fact alone fails to demonstrate that organizational boundaries are not useful variables. In our approach the emergence of inter-organizational cooperation is something to be explained rather than assumed. We begin to deal with whether and how these relationships emerge in our paper on inter-organizational implementation (O'Toole and Montjoy, 1977).
3. Two points about the dominant coalition should be mentioned. First, our usage, like Thompson's (1967: 128), would include groups outside the formal organization, such as interest groups and legislative committees, which regularly exercise major influence on the direction of agency activity. Second, one should not assume that agencies are mere passive recipients of externally-generated policies. Frequently mandates are drafted by or lobbied for by the bureaucracy and formally approved by policy makers. By virtue of their expertise, allies, and near-permanence, agencies may be in splendid position to exercise long-term influence in the policy-making process. However, the matter of implementation as we have defined it refers not to how a mandate is enacted but rather to what happens to it once it is propagated. To the extent that an agency has been successful in writing its own mandate, we would expect little resistance or distortion during implementation.
4. Though we have mentioned several types of resources here, we shall emphasize money and staff for most of the rest of this paper. We do this not because other resources are unimportant, but because it is much more difficult to identify and ultimately quantify resources such as authority. Since most of our analysis of actual cases in the present paper is based upon secondary sources, we are limited in our ability to document the amounts of all resources possessed by the organizations studied. Interestingly, money is a liquid medium of exchange, but federal bureaucracies are not allowed to convert money into staff freely. That is, federal controls place limits on agency budgets and personnel independently. This factor restricts resource utilization for these public organizations in ways unfamiliar to many private organizations.

5. Sampling procedure affects the sorts of inferences which one can make. Our cases were drawn from the GAO reports shelved at the University of Virginia depository. To guard against systematic biases by substantive policy area or by the specialty of the GAO researcher, we first used systematic, or interval, sampling to select five of the reports produced by each GAO division (as determined by the Superintendent of Documents classification number). Then we used the same procedure to sample from the whole set a sufficient number of cases to bring the total to about 200. We have no idea how closely the results approximate the distribution of all GAO cases or all implementation problems, but a random sample of these populations was not necessary for this exploratory research because we neither conduct statistical tests nor generalize to either population. Our goal was simply to see if the propositions made sense in a variety of substantive settings. Thus our procedure was designed to obtain cases from different substantive areas without having to read them first and thus run the risk of subconsciously selecting only those which conformed to our propositions.
6. Throughout this study GAO cases are referred to by short titles. Full citations may be found in the list of references.
7. All cases excluded fell into one of two categories. First, some cases did not document implementation or impact problems at all. A number of these described the activities of some agency but failed to mention any mandate. Several reports were simply "think pieces" about possible future policies. In other cases GAO merely gathered information on the efficiency of certain agency procedures. A second category consisted of GAO reports which may have contained some information about implementation or impact but did not contain sufficient information about our concepts to classify the case in a meaningful way. For example, if GAO failed to mention whether resources were provided for the execution of the policy, we did not include the case in our results. For these reasons we were unable to use 133 of the 191 cases which we reviewed. This outcome seems entirely understandable when one realizes that GAO was not utilizing our criteria when it selected and reported cases, and our method of sampling virtually guaranteed that both relevant and irrelevant cases would be included among the number we originally read. Such a result is likely in almost any secondary analysis.
8. We are grateful to Kenneth Meier for emphasizing this idea.
9. We classified the requirement that regulations be issued as specific. The mandate was probably vague with regard to the content of the regulations.

References

Allison, G. 1971. *Essence of Decision.* Boston: Little, Brown.

Anton, T. J. 1978. Review of Bardach (1977). *Administrative Quarterly* 23, 1 (March): 185-87.

Bailey, S. K. and E. K. Mosher. 1968. *ESEA: The Office of Education Administers a Law.* Syracuse: Syracuse University Press.

Bardach, E. 1977. *The Implementation Game.* Cambridge: MIT Press.

Berne, R. and C. H. Levine. 1977. "Interorganizational Analysis: Theoretical Opportunity or Technological Fix?" Presented at Annual Meeting of the American Society for Public Administration. Atlanta, Georgia. March 29-April 2.

Clark, P. B. and J. Q. Wilson. 1961. "Incentive Systems: A Theory of Organizations." *Administrative Science Quarterly* 6 (September): 219-66.

Cyert, R. and J. G. March. 1963. *A Behavioral Theory of the Firm.* Englewood Cliffs, New Jersey: Prentice-Hall.

Derthick, M. 1972. *New Towns In-Town.* Washington, D.C.: The Urban Institute.

Downs, A. 1967. *Inside Bureaucracy.* Boston: Little Brown.

Halperin, M. H. 1974. *Bureaucratic Politics and Foreign Policy.* Washington, D.C.: Brookings Institution.

Lowi, T. L. 1969. *The End of Liberalism.* New York: Norton.

———. 1972. "Four Systems of Policy, Politics, and Choice." *Public Administration Review* 32, 4 (July/August): 298-310.

Mohr, L. G. 1973. "The Concept of Organizational Goal." *American Political Science Review* 67, 2 (June): 470-81.

O'Toole, L. J., Jr. and R. S. Montjoy. 1977. "The Implementability of Legislative Mandates." A paper presented at the Annual Meeting of the Southern Political Science Association. New Orleans, Louisiana, November 4.

Pressman, J. L. 1975. *Federal Programs and City Politics.* Berkeley: University of California Press.

Pressman, J. L. and A. Wildavsky. 1973. *Implementation.* Berkeley: University of California Press.

Rose, R. 1977. "Implementation and Evaporation: The Record of MBO." *Public Administration Review* 37, 1 (January/February): 64-71.

Simon, H. A. 1957. *Models of Man.* New York: John Wiley and Sons.

Thompson, J. D. 1967. *Organizations in Action.* New York: McGraw Hill.

Tullock, G. 1965. *The Politics of Bureaucracy.* Washington, D.C.: Public Affairs Press.

U.S. General Accounting Office. "ADP." "Further Actions Needed to Centralize Procurement of Automatic Data Processing Equipment to Comply with Objectives of Public Law." October 1, 1975 (LCD 74-115).

———. "Audit." "An Overview of Federal Internal Audit." November 29, 1976 (FGMSD-76-50).

———. "8(a) SBA Program." "Questionable Effectiveness of the 8(a) Procurement Program." April 16, 1975 (GGD 75-57).

———. "Employment Services." "Employment Services for Vietnam-Era Veterans Could be Improved." November 29, 1974 (B-178741).

———. "Environmental Assessment." "Environmental Assessment Efforts for Proposed Projects Have Been Ineffective." July 22, 1975 (RED 75-383).

———. "Flood Prone." "Actions Needed to Provide Greater Insurance Protection to Flood-Prone Communities." July 19, 1973 (B-178737).

———. "Government Printing." "Pricing of Publications Sold to the Public." November 19, 1974 (P96/26).

———. "Great Plains." "Progress in Meeting Important Objectives of the Great Plains Conservation Program Could Be Improved." June 28, 1973 (B-114833).

———. "HMO." "Factors That Impede Progress in Implementing the Health Maintenance Organization Act of 1973." September 3, 1976 (HRD 76-128).

———. "HUD 236." "Little Accomplished in Insuring that Proper Rents Are Charged Under the Section 236 Rental Assistance Housing Program." October 5, 1976 (CED 76-146).

———. "Head Start." "Project Head Start: Achievements and Problems." May 20, 1975 (MWD 75-51).

———. "Land Acquisition." "Private Land Acquisition and National Parks: Improvements Needed." September 20, 1976 (CED 76-144).

———. "Law Enforcement Education." "Problems in Administering Programs to Improve Law Enforcement Education." June 11, 1976 (GGD 75-67).

———. "Loan Accounting." "Limited Progress Made in Devel-

oping Loan Accounting System." June 18, 1975 (FGMSD 75-37).

———. "MESA." "Improvements Still Needed in Coal Mine Dust-Sampling Program and Penalty Assessments and Collection." December 31, 1975 (RED 76-56).

———. "Non-Fuel Minerals." "Need to Develop a National Non-Fuel Mineral Policy." July 2, 1976 (RED 76-86).

———. "Oil and Gas." "Improvements Needed in the Federal Enhanced Oil and Gas Recovery Research, Development, and Demonstration Program." January 28, 1977 (EMD 77-3).

———. "Properties." "Protecting and Disposing of Single-Family Properties Acquired by the Department of Housing and Urban Development." August 31, 1976 (CED 76-141).

———. "Rural Development." "National Rural Development Efforts and the Impact of Federal Programs on a 12-County Rural Area in South Dakota." January 8, 1975 (RED 75-228).

———. "State Information." "States Need, But Are Not Getting, Full Information on Federal Financial Assistance Received." March 4, 1975 (GGD 75-55).

———. "Supplemental Food." "Preliminary Report on the Special Supplemental Food Program." September 9, 1973 (B-176994).

———. "Uniform Treatment of Prisoners." "Uniform Treatment of Prisoners Under the Military Correctional Facilities Act Currently Not Being Achieved." May 30, 1975 (FPCD 75-125).

———. "Upward Mobility." "Upward Mobility Program in the Federal Government Should Be Made More Effective." April 29, 1975 (FPCD 75-84).

———. "Waste Water Plants." Improvements Needed in Operating and Maintaining Waste Water Treatment Plants." June 18, 1976 (LCD 76-312).

Weatherley, R. and M. Lipsky. 1976. "Street-Level Bureaucrats and Institutional Innovation: Implementing Special Education Reform in Massachusetts." Paper presented at the Annual Meeting of the American Political Science Association. Chicago, Illinois, September 2-5.

Wildavsky, A. 1974. *The Politics of the Budgetary Process.* 2nd ed. Boston: Little, Brown.

Williams, W., ed. 1975. "Special Issue on Implementation." *Policy Analysis* 1, 3 (Summer).

Wilson, J. Q. and P. Rachal. 1977. "Can the Government Regulate Itself?" *The Public Interest* 46 (Winter): 3-14.

Yin, Robert K. and Karen A. Heald. 1975. "Using the Case Survey Method to Analyze Policy Studies." *Administrative Science Quarterly* 20 (September): 371-381.