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Implementing public policy : the Virginia Comprehensive Community Corrections Act for local-responsible offenders

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Implementing Public Policy: The Virginia Comprehensive Community Corrections Act for Local-Responsible Offenders

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ABSTRACT

This is a study of how the Department of Criminal Justice Services (DCJS) attempted to implement a major crime initiative, the Comprehensive Community Corrections Act (CCCA). The aim is to explain the implementation process in DCJS with reference to organizational models developed by Richard Elmore (1978). A careful analysis of the day-to-day operation and decision-making processes of DCJS, with particular emphasis on the implementation of the CCCA, shows that DCJS normally corresponds with the expectations of the "organizational development" and "bureaucratic process" models described in Elmore's typology of organizations. Still, agencies often must adapt to political and policy changes that might lead them to alter normal operating procedures. In this case, we see that although DCJS generally continued to act as it normally would, though time constraints, political considerations, and interagency tensions altered the norms of agency operations and decision-making.

I certify that I have read this thesis and find that, in scope and quality, it satisfies the uirements for the degree of Master of Arts.

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IMPLEMENTING PUBLIC POLICY

THE VIRGINIA COMPREHENSIVE COMMUNITY CORRECTIONS ACT FOR LOCAL-RESPONSIBLE OFFENDERS

by

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Introduction

The central questions addressed by scholars of public administration deal with how agencies implement public policy (see, for example, Sabatier (1986), Pressman and Wildavsky (1984), and Mazmanian and Sabatier (1989).) Traditionally, scholars have concentrated on the outcomes of the policy and process more so than the specific mechanics of implementation. Williams (1976) argued that little research has been conducted on the implementation of "social policies, programs, or projects or on the implementation process in a social policy organization such as a federal agency" (Williams, 1976a, 286-287; see also Ingram, 1977, 499; and Williams, 1976c, 4). While numerous studies of policy implementation have analyzed the process, Lane (1995) argues that traditional approaches to policy implementation analyses lack "a theory about the mechanism of implementation, [that is,] how programmes [sic] should be handled in order that stated objectives could be achieved in terms of positive outcomes" (Lane, 1995, 100). Thus, in this thesis, I rely on organizational theory as a way to studying the mechanics of implementation. The focus is on how the Virginia Department of Criminal Justice Services (DCJS) implemented the Comprehensive Community Corrections Act for Local-Responsible Offenders (CCCA).

The CCCA, a major statewide law, facilitates local involvement and provides flexibility in responding to crime. This is accomplished by allowing localities to establish a community-based corrections system tailored to fit individual local needs.[1] This local system provides the judiciary with sentencing options for certain misdemeanants and

[1] The CCCA is a community corrections act. A community corrections act is "a statewide mechanism included in legislation for involving citizens and granting funds to local units of government and community agencies to plan, to develop, and to deliver correctional sanctions and services at the local level" (Harris, 1996, 199).

nonviolent felons (known as "local-responsible offenders").[2] The localities oversee the provision of these options within guidelines set by the state. State funding, available through DCJS, supports programs established under the authority of the CCCA. Over $8 million was awarded in fiscal year 1996 for programs established under the CCCA. DCJS sets guidelines for program funding, monitors compliance, issues program regulations, and provides technical assistance for program operation.

The CCCA is a valuable case to examine the mechanics of policy implementation by DCJS for three reasons. First, the CCCA was part of a politically charged initiative supported by the governor and attractive to state legislators. Second, the CCCA replaced an existing program, the Community Diversion Act, making it subject to jurisdictional conflicts and potential intra-agency battles. Third, the legislation mandated that DCJS put the CCCA in place under a tight time schedule. These complexities make the CCCA an intriguing case that provides further insight into how a state agency with standard norms and procedures responds to external demands and internal pressures.

In order to understand how the agency responded to these three conditions, we need to identify a theoretical framework. Richard Elmore's (1978) four organizational models provide the theoretical framework for analyzing program implementation, though this case study offers several insightful corrections to Elmore's framework. We also

[2] The differences between state-responsible offenders and local-responsible offenders are subject to interpretation. In one sense, differences are based on the amount of time the individual is sentenced to incarceration. In another, they are based on where the offender is housed (i.e., jail or prison). The question is whether the offender should be considered state-responsible because of his sentence, or local-responsible because of where he or she resides. In the area of community corrections, local-responsible offenders may be considered those offenders who are under the supervision of a locally-operated supervision program; state-responsible offenders may be considered those offenders who are under the supervision of a state-operated supervision program. However, both state and locally operated supervision programs are in the community. The differences between the two are based primarily on who oversees the programs and what types of offenders are eligible for state or local placement.

need to describe briefly how the agency operates in "normal" times to appreciate how DCJS responded given the political context, policy changes, and time constraints.

The thesis argues that while DCJS operated as it normally would when implementing the CCCA, it did alter some of its operating procedures. DCJS normally operates along the lines of Elmore's "organizational development" model, with some tendencies of the "bureaucratic process" model. As Elmore defines the organizational development model, we normally expect DCJS to operate from the "bottom-up". In other words, individuals in lower organizational levels have a great deal of influence over their own work and the direction of the agency. Organizational operations characteristic of the bureaucratic process model include the use of specialized units and standard operating routines. As DCJS implemented the CCCA, it met the expectations of the organizational development model, and, to a lesser extent, the bureaucratic process model. External demands posed by political agendas, policy changes, and time constraints contribute to DCJS's deviations from its normal mode of operation. The agency also displayed characteristics of other administrative forms. For example, a shift in administrative agencies resulted in behavior associated with Elmore's "conflict and bargaining" model.

Multiple sources of information were used in this case study. A review of DCJS documents, files, and reports of the CCCA enabled me to trace the agency's formal channels of authority and decision-making in the year following the CCCA's enactment. Interviews with five DCJS staff members reveal the attitudes, reactions, and roles of the agency management and lower-level staff with respect to the implementation process.[3]

[3] Personal experience and observations also contribute to this project. I have been a significant player in the CCCA implementation process. As an analyst in the Correctional Services unit of the Department, I am responsible for most CCCA related activities. My involvement in implementing the CCCA has provided an

Interviews were conducted with the Deputy Director of the Bureau of Program Assistance, the Chief of the Correctional Services unit, and three of the four analysts within the unit.[4] (The Correctional Services unit has responsibility for administering the CCCA, a fact discussed in greater detail later.)[5]

Theoretical Framework: Elmore's Models

Elmore outlines four organizational models for analyzing social program implementation (1978): systems management, bureaucratic process, organizational development, and conflict and bargaining. Each model emphasizes different features of organizations and establishes distinct expectations for how agencies would implement policy. Elmore specifies four criteria, called propositions, for each model: central principle, distribution of power, organizational decision-making, and implementation process. Table 1 categorizes the essential elements characteristic of each proposition according to each model. The distribution of power and the decision-making process within an organization are the two major propositions Elmore develops, and they define the main differences between the models. The other two propositions, the central principle and the overall implementation process, derive their characteristics from the first two. The central principle states how organizations "should" operate if the particular

insider's view for this project. It has also given me access to files, documents, and information that an analyst from outside of the process may be unable to obtain.

[4] I am the fourth analyst in the Correctional Services unit.

[5] The Department's Director was recently named Deputy Secretary of Public Safety and was unavailable at the time interviews were conducted. The naming of the Department's Director to the Deputy Secretary of Public Safety is unfortunate because his views as both a political appointee and a relative newcomer to the organization (within the past two years) may be quite different from those of the career bureaucrats interviewed. (The Deputy Director has been with the agency for 23 years, the Chief for 12 years. The analysts interviewed have been with the agency 3, 5½, and 19½ years. I have been with the agency for 4½ years.)

model dominates agency functioning. The overall implementation process provides what Elmore terms a "thumbnail sketch" of agency operations when implementing policy (Elmore, 1978, 190).

Table 1: Matrix of Four Organizational Models of Social Program Implementation

	Systems Management	Bureaucratic Process	Organizational Development	Conflict & Bargaining
Central Principle	• Organiz. value-maximizing • Organiz. goal-directed behavior • Common understanding of policy	• Operating Routines • Discretion of individual workers	• Autonomy & control of own work at lower levels	• No common purpose w/i organization • Competition w/i agency for resources
Distribution of Power w/i Organization	• Hierarchical control - top sets goals & allocates tasks	• Based on specialization • Top exerts control thru other means • Resistance to change by lower levels	• Distributed at all levels • Top provides resources for lower levels • No direct top control over details	• No single control • Bargaining w/i organization
Organizational Decision-Making	• Top-Down • Top sets goals; lower decides how to meet	• Top-Down • Incremental • Division b/t policy-makers & street level bureaucrats	• Bottom-Up • Decisions on consensus of group at lower levels	• Not relevant • Bargaining w/i and among units/agencies
Implementation Process	• Detailed objectives • Use of mgt. controls to hold units accountable • Well defined standards of performance	• Identify discretion and change work routines to conform w/ policy. • Mgt. must induce lower levels	• Consensus building b/t policy-makers and individuals	• Constant conflict over purposes and results • Series of bargained decisions reflecting preferences and resources

Source: Elmore (1978) - Organizational Models of Social Program Implementation

As shown on Table 1, implementation as "systems management" operates on Elmore's central principle that organizations function as value-maximizing units. Thus, each task performed within the organization contributes to at least one set of well-defined agency objectives. By focusing narrowly on a few specific objectives, the organization's overall performance is enhanced. This model anticipates hierarchical control, allowing top management to set goals and allocate specific tasks (designed to meet these goals) to lower levels. Thus, direction and decisions flow from the top-down. Lower-level staff have limited discretion in determining how goals are met. Top management controls lower-level discretion through various means, including well defined performance standards.

The second model, implementation as "bureaucratic process", operates on the central principle that standard operating procedures and routines dictate organizational behavior. As with the systems management model, decisions flow from the top-down. However, this model does allow lower-level staff to exercise "relatively strong control over specific tasks within their sphere of authority" (Elmore, 1978, 199). Though lower-levels seemingly have more authority than in the systems management model, authority is restricted within the confines of standard operating routines. Thus, the primacy of standard operating routines ensures a top-down process is maintained. Top management exerts control through means such as clearance procedures and reporting requirements.

The bureaucratic process model has two distinguishing features which make it unique. First, lower-level staff resist change. They adhere to a "business as usual" mode of thinking and must be induced to alter their operational methods. Upper-

management bears responsibility for convincing lower-levels to change behavior. Secondly, the bureaucratic process model provides a clear distinction between policy-makers and service deliverers. Upper-management officials decide how policies are expressed in legislation, regulations, and guidelines. Lower-level staff act as service deliverers attempting to convey upper-management decisions to the organization's clients.

The third model, implementation as "organizational development", operates on the central principle that individuals within the agency participate actively in the agency's tasks. In focusing on the basic psychological and social needs of individuals, this model "views implementation as a process in which implementors shape policies and claim them as their own" (Elmore, 1978, 185). Unlike the previous models, the organizational development model is defined by a bottom-up decision-making process and promotes consensus building. Individuals and workgroups at lower levels have a high degree of autonomy in developing policy and making decisions. Upper-management provides the support and resources necessary for carrying out policies and decisions.

The fourth model, implementation as "conflict and bargaining", cannot be conveniently described as either "top-down" or "bottom-up". Agencies that fit the conflict and bargaining model lack a common organizational purpose. Thus, these agencies function as arenas of conflict in which competition for power and resources emerges. The "temporary ability of one individual or unit to mobilize sufficient resources to manipulate the behavior of others" determines the locus of power within an organization (Elmore, 1978, 217).

As Table 1 demonstrates, the characteristics of each proposition are not mutually

exclusive; they may be present in more than one proposition of a given model. For example, detailed objectives, listed in the implementation proposition of the systems management model, affect the goal-directed behavior of the model's central principle. Furthermore, the characteristics of each proposition are not necessarily limited to one model. For example, top-down decision-making is evident in both the systems management and bureaucratic process models.

Department of Criminal Justice Services (DCJS)

Before applying any theoretical models to the implementation of the CCCA, we need a preliminary understanding of DCJS' structure and procedures. The agency usually operates in a manner consistent with the expectations associated with an "organizational development" model combined with aspects of the "bureaucratic process" model. As part of the Executive branch of government, DCJS covers every aspect of the criminal justice system and serves as the Commonwealth's criminal justice policy and planning agency.[6] One staff member describes DCJS as "a change agent seeking to improve [criminal justice] system functioning" (staff interview 2, 7/3/96). According to staff members, the responsibility for initiating and setting policies is distributed among all levels within the agency. The Director sets the course of the agency by establishing the agency's mission and organizational structure, but staff interviewed agree that most of the agency's direction on specific issues is set by staff working below the Director.

DCJS operates as a small agency (approximately 100 staff members) with four

[6] DCJS is under the Office of the Secretary of Public Safety, a cabinet position of the Administration.

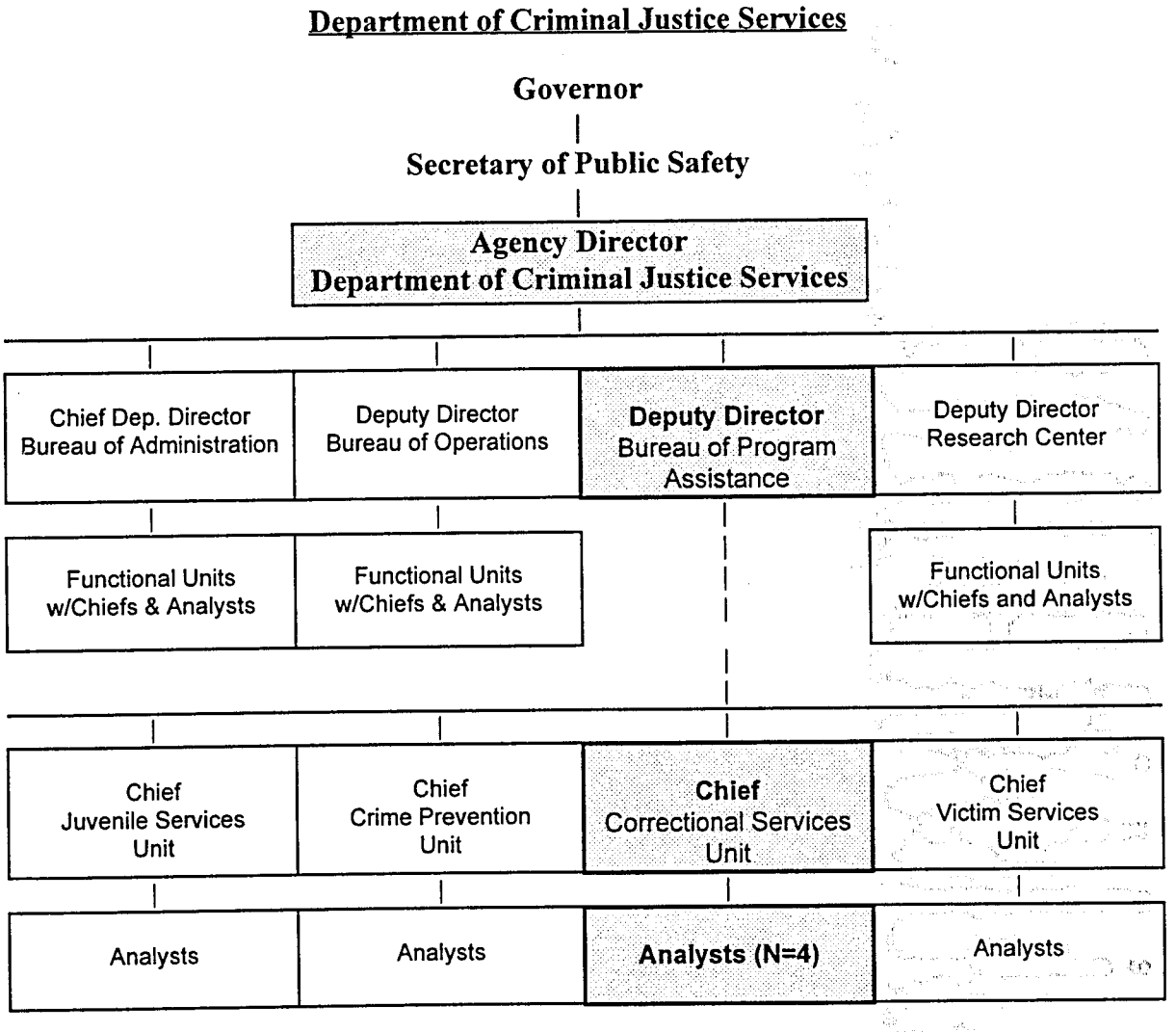
levels of administration (see Illustration 1). The Director occupies the only politically appointed position. The organizational diagram (Illustration 1) shows the agency's primary divisions of responsibility: administration, operations, program assistance, and research.[7] A Deputy Director oversees each division. The Director and Deputy Directors assume upper-management positions.

Characteristic of the bureaucratic process model, each unit exercises control over a specialized area of expertise. The Correctional Services unit, which administers the CCCA, seeks to enhance state and local adult correctional systems. The unit provides funding and technical assistance to various community-based initiatives, as well as to programs operating in jail and prison facilities.[8] The unit seeks to reduce duplication and increase coordination among the various adult correctional programs and related criminal justice components, such as the police (DCJS, 1994). As with other units in the agency, Correctional Services also provides information, advice, and assistance to members of each branch of government within the Commonwealth.

[7] The Bureau of Operations has responsibility for law enforcement and private security activities. The Bureau of Administration provides internal support through finance, purchasing, central files, computer assistance, and general grant administration activities. The Bureau of Program Assistance has responsibility for juvenile justice, crime prevention, victim services, and adult corrections activities. The Research Center has responsibility for conducting evaluations, developing jail population forecasts, and developing a state-wide integrated criminal justice database.

[8] Examples of programs currently or previously funded include: jail and prison based drug treatment programs, jail-based electronic monitoring programs (which provide for the use of electronic devices to alert supervising officials of an offender's absence from home), intensive supervision for state-responsible probationers and parolees (which provides for surveillance of offenders and frequent face-to-face visits with offenders), employment and life skills for offenders about to be released from jail and prison, alternatives to jail for public inebriates, and pretrial services programs (which provide background investigations of defendants prior to arraignments and supervision of certain defendants released from jail without the benefit of bail.) For fiscal year 1996, the Correctional Services unit is funding over 60 specific grants totaling approximately $13.5 million.

Illustration 1



The degree of upper-management involvement in DCJS activities depends on the political environment surrounding a given activity. For example, if the activity generates a lot of public or political attention, the Director assumes a more involved role in the specific details of the activity. Programs that attract less public attention are left to the discretion of the analysts. One example of limited Director involvement is in the area of electronic monitoring, an early release option for sheriffs and jail administrators.

Electronic monitoring is used for certain low-risk offenders in order to free jail bed space for high-risk offenders. Since electronic monitoring is an long standing grant program, its political prominence is limited. DCJS funded several electronic monitoring programs in 1994 with no input from the Director.

DCJS filters state and federal funds to local units of government in the form of grants as part of its duties. Units within the Bureaus of Operations and Program Assistance handle most grant activities. The specific unit responsible for grant activities depends on the purpose of the grant program.[9] For example, all grant programs addressing crime prevention activities are administered by the Crime Prevention unit. The CCCA is administered as a grant program.

Standard operating routines, rooted in the lower levels of the agency, dictate the general grant process. Analysts, the lowest level of the organizational structure, are responsible for interpreting legislative intent and any existing policies surrounding a specific grant area. They also do all things that are necessary to manage grant programs, including: developing program specifications and grant guidelines, reviewing grant applications, determining funding amounts and priorities, applying conditions to grants, and monitoring grant programs for compliance.

The Director reviews grant guideline packages and signs letters announcing funding availability and grant awards. However, he relies on the expertise of other agency staff to set the specific policies and make the necessary decisions. My experience has been

[9] Grants Administration (under the Bureau of Administration) is a separate unit that provides assistance to the individual units responsible for establishing grant programs and monitoring grantees. Grants Administration handles the disbursement of funds and all paperwork necessary for funds to be disbursed and awards to be amended. This unit also reviews requests from grantees to amend budgets to ensure that requests comply with state or federal guidelines. The analyst monitoring the grant has final approval as to whether amendments can be made.

that in many cases, the involvement of upper- and middle-management levels depends on the comfort level of the analyst responsible for the work. The political environment surrounding the grant program also factors into the level of management involvement. The case study demonstrates how the CCCA affected agency procedures.

Implementing the CCCA

In order to understand how DCJS implemented the CCCA, we must describe the political conditions and policy constraints with which the agency was operating. Agencies do not exist in isolation from external forces. To the contrary, they must adapt to external pressures, some of which are relatively constant and easy to anticipate, others are less predictable. As DCJS attempted to implement the CCCA, it had to adjust to the expectations of elected officials, a shift in policy jurisdiction for community corrections, and a rigid timetable. As we shall see, these conditions slightly altered the normal operating procedures of the agency.

Political and Policy Context

In September 1994, a special session of the Virginia General Assembly convened to abolish parole and establish "truth-in-sentencing". This special session was called by Governor George Allen, the first Republican Governor in Virginia in 12 years. Governor Allen ran a "tough on crime" campaign and assumed office determined to abolish parole and establish "truth-in-sentencing". "Truth-in-sentencing" seeks to ensure that the actual sentence ordered by the court is served by the offender. Allen clearly wanted to accomplish this goal during his first year in office. Thus, early into his term Allen

appointed a commission charged with fulfilling his "tough on crime" pledge.

The Governor's initiative on crime threatened to undercut the policy crafted by the Democrat-dominated legislature. The legislature had been developing a similar plan for several years. In addition to abolishing parole and establishing "truth-in-sentencing", the legislature included community-based supervision options (commonly referred to as community corrections) in its overall plan.[10] Both the Governor and the legislature faced political pressure. Allen believed he was fulfilling the mandate of his election. The Democrats were facing elections the following fall and could not afford to be labeled as "soft on crime". A battle ensued over whom would be credited for the parole abolition plan, the Governor or the legislature. Negotiations resulted in the advancement of the Governor's plan to abolish parole and establish "truth-in-sentencing" as well as the community corrections components developed by the Democrats. The CCCA was part of the overall package passed into law.

DCJS faced two major obstacles in implementing the CCCA: time and a previous policy. When the CCCA was signed into law on October 13, 1994, DCJS had only eight months (until July 1, 1995) to put into place a system of locally designed and operated community corrections programs. This required a great deal of planning, including: identifying program structures and funding methods, and informing and educating local government and criminal justice professionals. Technical amendments to the law were necessary, as were resources to fund the resulting programs.

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[10]Community corrections is broadly defined here as any correctional program in which the offender resides in the community, as opposed to a jail or prison facility. There is actually little consensus in the field on the definition of community corrections. "Sometimes the emphasis in discussion of community corrections is on noninstitutional programs, sometimes it is on local versus state program administration, sometimes it is on citizen involvement, and sometimes the emphasis is on something else entirely" (Harris, 1996, 204).

Another complication in the implementation process was that the CCCA replaced an existing policy. When the CCCA was enacted, the Community Diversion Act of 1980 was repealed. The Community Diversion Act (CDA) was administered not by DCJS, but by the Department of Corrections (hereafter referred to as Corrections). Replacing the CDA with the CCCA altered several aspects of community corrections policy: administrative jurisdiction, program operation responsibility, funding methodologies, court procedures, offender eligibility, and local criminal justice board composition and duties. As we shall see further along in the thesis, the complications of replacing the CDA with the CCCA affected DCJS's operations.

Under the CDA, Corrections operated 29 community-based programs, known as Community Diversion programs. These programs provided supervision to approximately 5,000 offenders on a daily basis. Repealing the CDA meant ceasing operation of the Community Diversion programs and leaving offenders without supervision. Furthermore, judges were left with a limited number of sentencing options in deciding where to send offenders for supervision and punishment. Thus, in the midst of implementing a new program, DCJS also had to ensure the supervision of offenders already under Community Diversion programming. In order to extend the provision of offender supervision, existing Community Diversion programs were charged to restructure program operation. Such restructuring was done in accordance with the CCCA and DCJS program guidelines.

Case Study - DCJS Implementation

The propositions of Elmore's four organizational models provide the foundation for analyzing the CCCA's implementation. The activities and policy decisions engaged in during in the CCCA's first year follow the procedural norms of policy implementation and serve as the base evidence for the case study.[11] As I noted earlier, DCJS normally functions along the lines of the organizational-development model with some aspects of the bureaucratic process model. Yet we began with the supposition that the political and policy conditions underlying the CCCA could very well alter the normal operating procedures of the agency. Table 2 gives a systematic view of how DCJS's implementation of the CCCA corresponds with Elmore's structure (presented in Table 1).[12]

A plus sign next to a specific element indicates a clear positive relationship with Elmore's models, a minus sign indicates a lack of supporting evidence. A combined plus/minus sign indicates a positive relationship between the evidence and the model in some respects and a divergence in others. Using Elmore's four models as a framework, we see in Table 2 that the CCCA's implementation by DCJS conformed to the organizational development model structure, while displaying several elements of the bureaucratic process model. However, Table 2 also shows that evidence from this study illustrates that aspects of all four models apply to DCJS. The remainder of this

[11] Implementation activities typically include: planning, analyzing problems, awarding grants, disbursing funds, and collecting and disseminating information and data (Edwards, 1980, 2; see also Pressman and Wildavsky, 1984, xxiii; Gordan, 1982, 453; Edwards, 1978, 292; Bardach, 1977, 58; and Williams, 1976a, 268).

[12] Tables 3 and 4 in the appendix provide a chronological accounting of the activities examined for this analysis and are often referred to in the discussion. These activities make up the elements of the case study. Table 3 shows specific memoranda, meeting agendas, and presentations. Table 3 also shows who presented the activity, as well as the level of initiation and development. Table 4 is set up in a similar fashion and shows other activities such as planning, goal establishment, and program funding.

section will describe how the case study supports each model.[13]

Table 2: The CCCA and Four Organizational Models

	Systems Management	Bureaucratic Process	Organizational Development	Conflict & Bargaining
Central Principle	+ Organiz. value-maximizing + Organiz. goal-directed behavior - Common understanding of policy	± Operating Routines + Discretion of individual workers	+ Autonomy & control of own work	- No common purpose w/i organization - Competition w/i agency for resources
Distribution of Power w/i Organization	- Hierarchical control - top sets goals & allocates tasks	+ Based on specialization + Top exerts control thru other means - Resistance to change by lower levels	+ Distributed at all levels + Top provides resources for lower levels + No direct top control over details	- No single control - Conflict & Bargaining w/i organization
Organizational Decision-Making	- Top-Down - Top sets goals; lower decides how to meet	- Top-Down - Incremental - Division b/t policy-makers & street level bureaucrats	+ Bottom-Up + Decisions on consensus of group at lower levels	- Not relevant ± Bargaining w/i and among units/agencies
Implementation Process	+ Objectives - Use of mgt. controls to hold units accountable - Well defined standards of performance	- Identify discretion and change work routines to conform w/ policy. - Mgt. must induce lower levels	+ Consensus building b/t policy-makers and individuals	- Constant conflict over purposes and results - Series of bargained decisions reflecting preferences and resources

Source: Compiled by author based on results of the case study.

[13] Unless otherwise noted, general references to the unit, Chief, analysts, and Deputy Director indicate the Correctional Services unit and the chain of command the unit follows.

Organizational Development

In implementing the CCCA, DCJS operated in accordance with the organizational development model more directly than with any other model. As Table 2 illustrates, the case study positively correlates with each element of this model.

The case study strongly supports the central principle characteristic of the organizational development model. Autonomy at lower-levels within an organization defines this central principle proposition. The model interprets autonomy as all-encompassing, meaning that "those who implement programs are included in decisions that determine the content of those programs" (Elmore, 1978, 209). Activities involved in the content, or policy-making, function of this definition include legislative amendments, program specifications, and funding decisions. Implementation activities, according to this definition, include technical assistance and program monitoring. In the general mode of operation for DCJS grant programs, the same individuals perform both policy-making and implementation functions. As shown in Table 4, both functions in the case study were performed at the same organizational level. Analysts developed CCCA program specifics, introduced legislative amendments, and made funding decisions. They also assisted localities in establishing programs and monitored programs for compliance.

In accordance with the distribution of power proposition of the organizational development model, responsibility for final CCCA products was distributed among all levels of DCJS. Responsibilities in this example included presenting, signing, and reviewing documents. As Table 3 shows, presentations were made by analysts, the Chief, and the Director. Furthermore, interviews confirm that the Director and Deputy

Director relied on the Correctional Services unit to determine how to implement the CCCA. Direct control over the details of each implementation activity was not exerted by either the Director or the Deputy Director. As Tables 3 and 4 indicate, analysts developed the details of all activities. The Chief, Deputy Director, and Director facilitated the attainment of goals and priorities (set by the analysts) by providing support and resources. As one official pointed out, the middle and upper-management levels functioned "primarily to support staff work, prevent interference, [and] serve as a buffer from [the] politics" (staff interview 2, 7/3/96).

The evidence of this case study further upholds the decision-making proposition of the organizational development model. This model emphasizes bottom-up approaches to decision-making and consensus building. The Chief summarized the CCCA implementation decision-making processes in stating:

> Analysts were responsible for the bulk of the decisions and activities. Approval, blessings, were generally pro forma because in DCJS the specific program expertise resides at the staff level. Once decisions were made - at staff level - and alternatives considered - at Chief's level - recommendations with excellent staff justification were advanced for expected approval (staff interview 2, 7/3/96).

As the Chief notes, the decisions regarding the implementation activities were made at the analyst level and advanced upward through the chain of command for support. Tables 3 and 4 demonstrate that decisions to initiate most implementation activities were made at the analyst level. On Table 3, for example, analysts initiated all but one of the memoranda. Table 4 indicates that analysts initiated goals, planning teams, a conference, and alternate funding processes. Implementation priorities were also established at this lower level. The specific tasks necessary for implementing the CCCA

were assigned neither by the Director nor the Deputy Director, but were based on the goals and priorities set at the lower level. The analysts identified the necessary implementation activities and made decisions to proceed with those activities. Analysts also determined the appropriate course of action to undertake. Regardless of who actually presented, signed, or had final review of the work, the analysts initiated most activities and determined the steps necessary to fulfill them. Furthermore, analysts decided information to include in all presentations, reports, and documents and even determined which authority should sign the memoranda, including the Chief and the Secretary of Public Safety. The format of memoranda may have been edited by the signing official, but the content and direction established by the analysts remained essentially untouched.

The decision-making and overall implementation processes of the organizational development model include consensus building, also upheld by evidence from the case study. The Correctional Services unit utilized a consensus process in setting the specific goals and objectives, identifying the necessary steps to accomplish them, and establishing priorities. A specific example of consensus building is found in the process used for establishing priorities. The unit (analysts and the Chief) held a day-long retreat to accomplish the task. Using a common consensus building technique, the group listed all CCCA related activities, as well as other activities that existed before the policy was passed. The group then prioritized each activity.

Bureaucratic Process

Evidence also supports elements of the bureaucratic process model. In relation to

Table 2, the evidence from this study upholds the central principle and distribution of power elements of the model. However, the case study yields no evidence to support the decision-making proposition and the overall implementation perspective of the bureaucratic process model.

DCJS operated in accordance with the bureaucratic process model's central principle. DCJS typically utilizes standard operating routines which incorporate individual discretion for the grants process. Table 4 shows that these routines were generally followed for developing the CCCA grant application package.

Yet, time constraints and the political environment may have caused the Department to deviate from the standard routine in some respects (hence, I use a combined symbol on Table 2.) Table 4 includes an activity labeled "interim funding", which is not a standard procedure. The grant application package for CCCA programming could not be developed and released in time to make grant awards for the new fiscal year. Maintaining supervision for the 5,000 plus offenders under Community Diversion programming necessitated the adoption of an "emergency funding" measure. Localities were given interim funding without completing a grant application. The interim funding allowed localities to continue Community Diversion programming for three months. A complete grant application package was developed for funding the remaining nine months of the fiscal year.

As Table 4 notes, the Secretary of Public Safety reviewed the grant package developed in June 1995. The Secretary's review marked a departure from standard procedure. Under normal circumstances, the agency's Director has final review of grant guidelines. The Director advanced the CCCA grant guidelines to the Secretary of Public

Safety. Based on the fact that the CCCA was part of the Governor's highly-publicized crime package, the political environment may be responsible for the Director's role in advancing the package. The Secretary made no changes to the document and the additional layer of review interrupted the standard process.

The distribution of power proposition provides more evidence supporting the bureaucratic process model. As this proposition indicates, a specialized unit (the Correctional Services unit) was given control over implementation activities. The unit is responsible for state and local adult correctional programs such as the CCCA.

Clearance procedures, budget cycles, and legislative procedures engaged in during the implementation period further uphold the distribution of power in the bureaucratic process model. Grant guidelines, for example, normally require the Director's approval before being released. The Correctional Services unit, as indicated on Table 4, followed the procedure in seeking the Director's approval. In another example, the unit had responsibility for developing staffing patterns, budget requests, and legislative proposals relating to the CCCA. Again, Table 4 shows that clearance procedures at each level in the agency were used for advancing CCCA related proposals and requests to the Governor's office.

The bureaucratic process model distinguishes between the policy-makers (defined as those responsible for legislation, regulations, and guidelines) and employees that deal with the agency's clients. Such divisions of responsibility do not exist in the Department as a whole. The personnel who monitor grants and provide technical assistance to the field also develop grant guidelines, introduce legislative modifications, and establish regulations. Table 4 indicates that analysts bore responsibility for each of

these activities in implementing the CCCA.

In terms of the overall implementation process of this model, lower levels are expected to resist new initiatives. No evidence from the case study upholds this contention. To the contrary, the analysts within the Correctional Services unit (according to one official) "accepted policy and decision-making responsibility with little hesitancy" and began the process of implementing the CCCA immediately upon its passage (staff interview 2, 7/3/96).

Tables 3 and 4 present additional evidence supporting the observation that the lower levels within DCJS did not resist the CCCA. As shown on Table 3, analysts initiated and composed memoranda, established goals, and developed planning teams during the same month the CCCA was signed into law. The establishment of priorities followed the next month. Each of these activities was initiated at the lowest level in the organization without inducement from upper-management. As one staff member noted, "analysts were very invested and contributed incredible time and energy" (staff interview 2, 7/3/96). Another commented that the analysts "actually made it [the implementation of the CCCA] happen" (staff interview 1, 7/2/96).

Systems Management

Examination of CCCA implementation activities reveals that there were also elements of the systems management model displayed by DCJS during the process. As Table 2 indicates, evidence from the case study supports the model's central principle and overall view of the implementation process. However, the model's propositions of distribution of power and decision-making are not supported by the

evidence.

The systems management model's central principle expects value-maximizing and goal-directed behavior to occur within the Department during policy implementation. These two elements assume that a "single, coherent set of purposes", expressed through established goals and objectives, affects organizational behavior (Elmore, 1978, 201). The CCCA "represents a progressive approach to the planning, administration, and implementation of community-managed programs throughout Virginia" (VCDDA, 1994, 1). Thus, the policy conforms to the broad mission of DCJS and to the specific purpose of the Correctional Services unit as this model anticipates.

Specific implementation activities (listed on Table 4 in the Appendix) further support the value-maximizing and goal-directed elements. As Table 4 notes, goals for CCCA implementation were established in October 1994, shortly after the legislation was passed. The development of planning teams followed the same month. In November 1994, priorities for implementation were established.

The systems management model provides three criteria for assessing the overall implementation process proposition. The CCCA fulfills one of the criteria: the establishment of objectives. In November 1994, analysts of the Correctional Services unit produced a list of objectives (used to establish the priorities mentioned earlier) for the CCCA. The management controls for accountability and well defined standards of performance, the other two characteristics of implementation under the model, were not displayed.

Conflict and Bargaining

Limited support for the conflict and bargaining model appears on Table 2. Evidence fails to uphold the central principle, the distribution of power, and the overall implementation process characteristic of this model. But a link between the case and the model appears in the organizational decision-making proposition.

Support for the conflict and bargaining model is found in transition activities, including transferring information, staffing, and funding from Corrections to DCJS. As noted earlier, the CCCA replaced the Community Diversion Act administered by Corrections. Staff and financial resources previously dedicated to Community Diversion programs needed to be transferred to DCJS, but Corrections was reluctant to identify those resources. DCJS' files contain several memoranda to Corrections requesting information relating to the Community Diversion program. Rather than give DCJS access to the information, Corrections rerouted requests to the programs, refused to identify staffing and funding resources, and delayed providing other requested information. Furthermore, Corrections "provided mis-information [and] undermined [the] efforts" of DCJS (staff interview 2, 7/3/96). According to one DCJS official, Corrections did not display "a positive attitude about the transfer with [Community Diversion] program directors" which only made the transition to CCCA programming more difficult (staff interview 1, 7/2/96). Other DCJS officials interviewed shared this view of Corrections' attitude. During the conference previously mentioned, a Corrections official was given the opportunity to address the local officials in attendance. Rather than present a positive attitude of support, a Corrections Deputy Director publicly accused DCJS of "stealing" the Community Diversion program "in the middle of the night". He

continued on to say that "nothing is set in stone" and that "this could all change" - meaning that Corrections would regain administrative control of the program (Deputy Director, Department of Corrections, DCJS conference, 4/5/95).

A statewide transition team, noted on Table 3, was organized to facilitate discussions necessary for the transition between agencies. Representatives from DCJS, Corrections, and two other agencies (the Department of Planning and Budget and the Office of the Secretary of Public Safety) met several times to consider these issues. DCJS controlled the agendas of the transition meetings, but Corrections exerted control by withholding important information. Corrections claimed expenditures of $8.1 million for Community Diversion programming. Based on Corrections' information, the legislature supported transferring $8.1 million from Corrections to DCJS. DCJS later discovered that Corrections actually spent $8.4 million on programming plus $46,000 on program insurance. The transferred funding also "failed to account for overhead expenses [and] infrastructure costs (certification, training, management information systems, and fiscal services)" (DCJS, 1995, 2).

Conflict and bargaining between the two agencies continued over staff resources. Despite Corrections' reluctance to identify staff resources, the General Assembly transferred two positions to DCJS.[14] Once the two positions were transferred, Corrections quickly offered two individuals to DCJS. However, DCJS coveted the positions, not the individuals occupying them. DCJS refused to accept the staff offered by Corrections and insisted that vacant positions be transferred. Thus, DCJS could choose individuals to fill the positions.

[14]Corrections originally stated that no agency staff were dedicated to Community Diversion programming.

Conclusion

The principal aim of this thesis was to demonstrate how an agency attempts to implement a major policy initiative. Case study research limits our capacity to generalize about policy implementation, but several important lessons emerge from this study that may be transferable to other government agencies operating under similar conditions. The study also calls attention to several useful corrections to Elmore's framework of organizational models, which may be expected when theoretical models are tested against a "real world" scenario.

Three primary lessons emerge from the case study. First, despite the prevalence of a single operational model, elements of other models are likely to emerge as an agency implements a specific policy. The second lesson revealed in this case study is that independent variables, such as time constraints, affect an agency's normal mode of operation. Finally, this case study demonstrates that DCJS is not a self-contained agency and that external factors affect implementation.

The case study analysis concludes that DCJS exhibited elements of each model during CCCA implementation. Though DCJS generally conformed to the organizational development model, with some bureaucratic process model tendencies, certain aspects of the other models were evident in this case. This finding validates Elmore's theories. Elmore suggests that agencies exhibit traits of multiple models. As Elmore notes, "every implementing agency probably has a set of management controls, a firmly entrenched collection of operating routines, some process for eliciting the involvement of implementors, and a set of internal and external bargaining relationships" (Elmore, 1978, 227).

The analysis also proves that DCJS altered certain behavioral norms due to circumstances specific to the CCCA's implementation. This deviation, too, is expected by Elmore. Elmore contends that certain situations may dictate one type of organizational behavior, while other situations solicit another type. Therefore, the functional model utilized by an agency is often affected by a specific situation.

Evidence supporting the third lesson of agency operation suggests the limitations of Elmore's theoretical framework. Elmore is less concerned with external influences than internal organization.[15] Several sources outside of the agency affected DCJS's implementation of the CCCA. Political pressure from the Secretary of Public Safety provided one such source. Interviews revealed that the Secretary of Public Safety did not understand the full magnitude of the CCCA. This is largely attributable to the Administration's focus on violent crime, rather than non-violent crime. The Secretary was unclear on the extent of the CCCA's local and state implications. Because of his limited understanding, the Secretary hindered implementation. An example of how the Secretary affected implementation activities surfaces in the conference referred to in Table 4. The conference intended to educate local criminal justice and government officials on the changes in the law and explain how to establish programs under the CCCA. The Secretary insisted on approving all presenters and conference topics, thus delaying finalizing conference details. Recognizing the event as an opportunity for the Administration to present its early successes in a public forum, the Secretary ordered the elimination of two scheduled presenters. The altercation allowed the Secretary and

[15] Elmore does address external influences in his discussion. However, Elmore does not assess the role of external influences on a single agency's behavior.

the Attorney General platforms to highlight the Administration's "tough on crime" successes. The conference ended up being "misused as a political, rather than educational, forum" (staff interview 2, 7/3/96).

The Department of Corrections provided another external constraint on DCJS's ability to implement the CCCA. As noted in the section on conflict and bargaining, Corrections affected DCJS's implementation activities through resistance, negative attitudes, and mis-information. The mis-information and negative opinions from another state agency caused additional fear and concern at the local level. Furthermore, it contributed to resistance of the programming changes necessary to carry out the law's intent. DCJS staff received numerous phone calls and letters requesting personal visits to justify the CCCA's existence. This included discussing the policy implications and explaining how repealing the Community Diversion Act would affect those employed by Community Diversion programs. Several program staff contacted the Secretary of Public Safety and legislative staff for clarification of the information and opinions they had received. These additional questions required staff attention, which often meant delaying other activities which were necessary for DCJS to implement the CCCA.

Failure to account for external influences is not the only limitation to Elmore's models. The case study further demonstrates that evidence upholding one model may also support another. For example, information presented on the grants process characterizes both the bureaucratic process and organizational development models. Since Elmore provides no guidelines for weighing variables or dependencies between variables, the evidence supports each model equally which may make it difficult to determine if one model reflects an agency's mode of operation more than another.

Thus, Elmore's models provide a framework for examining how agencies implement public policy. These models offer an opportunity to compare how an agency functions under normal circumstances and with how it adapts to a major new initiative. This case study uncovers several factors that affect how an agency functions which do not fit clearly into Elmore's organizational model classification. However such findings generally confirm the expectations of Elmore, Lane, Sabatier, and other theorists who tend to agree that limitations exist in applying a single analytical model to policy implementation.[16] Many factors, both internal and external to the specific policy, affect its implementation. Though agencies can adapt to these factors, changes in political and policy conditions can alter the normal mode of operations of an agency charged with implementing a major policy initiative.

[16]Elmore, 1978; Lane, 1995; and Sabatier, 1986; See also, Williams, 1976a; Edwards and Sharkansky, 1978; Edwards, 1980; Pressman and Wildavsky, 1984; and Wilson, 1989.

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APPENDIX

Table 3

CCCA Implementation Activities *

Date/Activity	Presented/Signed or Reviewed	Addressed To	Initiated/Decided By	Developed By
10/12/94 Memo re: CCCA	Sec. of Public Safety (SPS)	Local Distribution	Analyst	Analyst
10/21/94 Memo Rqst. CDI info.	Dep. Director	Corrections Dep. Director	Analyst	Analyst
10/21/94 Memo. re: Trans. Tm.	Dep. Director	SPS, Plan. & Budget, Legis. staff	Deputy Director & Deputy SPS	Analyst
11/1/94 Trans. Tm. Meeting Agenda	Dep. Director	Statewide Transition Team	Dep. Director	Analyst
1/95 Presentation re: Implementation	Director (made presentation)	Public Sfty Sub-Com. House App.	House Appropriations	Analyst
1/95 Presentation re: 2005 Mstr Plan	Sec. of Public Safety	General Assembly	Legislation	Analyst
2/17/95 Memo Intro. Dept. & CCCA process	Director	County Admin. City Managers	Analyst	Analyst
3/95 Presentation re: Implementation	Director (made presentation)	Commonwealth's Attorneys Assoc.	Commonwealth's Attorneys Assoc.	Analyst
3/21/95 Trans. Tm. Meeting Agenda	Dep. Director	Statewide Transition Team	Dep. Director	Analyst
5/95 Presentation re: Implementation	Director (made presentation)	VA State Crime Commission	VA State Crime Commission	Analyst
5/95 Presentation re: Implementation	Director (made presentation)	District Court Judges	Supreme Court	Analyst
5/95 Presentations (2) re: Implement.	Chief (made presentations)	Community Divers. Directors Assoc.	CDI Directors Assoc.	Analyst
5/24/95 Memo re: Case Transfers	Sec. of Public Safety	Directors DCJS &. Corrections	Analyst	Analyst
6/14/95 Memo re: Insurance	Deputy Sec. of Public Safety	Chief	Analyst	Analyst
6/15/95 Memo re: Case Transfers	Chief	Community Diversion Directors	Analyst	Analyst
6/19/95 Memo re: Insurance	Deputy Sec. of Public Safety	Corrections Director	Analyst	Analyst
6/21/95 Memo re: CDI Info.	Chief	Corrections Data Info. Mgt. Mgr.	Analyst	Analyst
6/21/95 Memo re: Misc. Issues	Chief	Community Diversion Directors	Analyst	Analyst
7/20/95 Memo re: Misc. Issues	Chief	CCCA Directors	Analyst	Analyst
7/25/95 Trans. Tm. Meeting Agenda	Dep. Director	Transition Team	Dep. Director	Analyst
8/95 Presentation re: Implementation	Analyst (made presentation)	District Court Judges	Supreme Court	Analyst
9/95 Memo re: Review process	Chief	County Admin. City Managers	Analyst	Analyst

*Unless otherwise indicated all positions are in the Deptartment of Criminal Justice Services. Deputy Director refers to the Deputy Director of the Bureau of Program Assistance.

Table 4

CCCA Implementation Activity Groups *

Date/Activity	Presented, Signed, or Reviewed	Initiated/ Decided By	Developed/ Written By	Notes of Interest
10/94 Goal Establishment	Analyst	Analyst	Analyst	Set by analyst; presented to unit & above w/no question
10/94 Planning Teams	Director	Analyst	Analyst	5 Teams (one actually had higher level of involvement & oversight)
11/94 Priority Establishment	Unit	Unit	Unit	Nominal group w/i unit
Began 12/94 Program Regulations	Administrative Process Act	Legislation	Analyst	Several layers to go through to have standards in place (regulations) - ongoing
12/94 - 4/95 Conference	Director	Analyst	Analyst	Some interference from Sec. of Public Safety
1/95 Code Amendments	Governor	Standard Process	Analyst	Complicated process
1/95 Staffing Plan/Funding Request	Sec. of Public Safety	Standard Process	Analyst	Budget cycle
4/95 Interim Funding	Director	Analyst	Analyst	New idea; no standard process
6/95 Interim Funding Base	Director	Analyst	Analyst	Used 1/4 of previous year's CDI contract
6/95 Grant Package Dev.	Director & Secretary of Public Safety (SPS)	Standard Process	Analyst	SPS approval new. Due to high profile of program, Director wanted to follow the full chain of command.
7/95 Staffing issues	Director	Standard Process	Chief & Dep. Director	No DOC staff transfers; placement of new positions; losses due to cuts
Began 7/95 Program Monitoring	Analyst	Standard Process	Analyst	Ongoing
Began 7/95 Program Specs./Modif.	Analyst	Analyst	Analyst	Ongoing
8/95-9/95 Grant Review and Awards	Director	Standard Process	Analyst	Analysts review of grants & determined funding. Chief conceded to potential political issue. Very unusual
9/95 Grant Conditions	Director	Standard Process	Analyst & Standard DCJS grant conditions	Coordinating b/t units for develop. of grant conditions problematic
10/95 Legis. Report	Director	Legislation	Analyst	Included history & 1st yr. observations

*Unless otherwise indicated all positions are in the Deptartment of Criminal Justice Services. Deputy Director refers to the Deputy Director of the Bureau of Program Assistance.

Tracey Lynn Jenkins

Tracey Lynn Jenkins received her Bachelor of Arts degree in 1987 from Westhampton College, University of Richmond. Majoring in Sociology and Criminal Justice, Ms. Jenkins went on to pursue a career in criminal justice. From 1987 until 1992 Ms. Jenkins worked with the Virginia Department of Corrections and advanced to the position of Senior Agency Management Analyst. During her tenure, Ms. Jenkins provided executive management with client and program data which was used to guide informed policy-making decisions. For three years Ms. Jenkins served as the legislative coordinator for the Planning and Engineering Division of the Department. Ms. Jenkins also authored several evaluations and reports and has published three evaluations.

In 1992 Ms. Jenkins joined the Virginia Department of Criminal Justice Services as a Criminal Justice Program Analyst, specializing in adult correctional populations. As part of a small team, Ms. Jenkins works to improve the operational effectiveness of the correctional system through program planning and development efforts. Ms. Jenkins has been a significant contributor to the shaping of the Comprehensive Community Corrections Act for Local-Responsible Offenders and has managed its implementation. Ms. Jenkins' involvement in this Act has included developing the initial executive position paper on the subject, drafting legislative proposals, and working with national experts in the development of training for local criminal justice professionals. Ms. Jenkins has developed various papers, presentations, and documents on the subject, including a ten-year plan and the administrative grant guidelines and regulatory standards each locality is required to adhere to. Ms. Jenkins continues to oversee the Act's administration. Ms. Jenkins has also assisted in the creation and development of local criminal justice boards state-wide. As part of her duties, Ms. Jenkins serves as a legislative coordinator for adult correctional issues and has developed the adult correctional issues portion of the Commonwealth's criminal justice plan.