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Policy Implementation by the New Street Level Bureaucrats in Non-profit Organizations: Overcoming the Dilemma

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ABSTRACT

Policy implementation at the bottom by the frontline workers is a variation from the rational top-down implementation process. This paper discusses services transferred from the public to the non-profit agency delivered by the new street level bureaucrats which are different from what the bottom-up scholars have predicted. The actual agency goals are improvised when dealing with emergency cases or case by case basis. Two agencies were selected such as Tri-City Action Program (Tri-CAP) and Cambridge Economic Opportunity Committee, Inc. (CEOC) in Massachusetts, United States of America. Both agencies receive government Block Grant and deliver many similar services. The research method was qualitative, empirical and exploratory. Intensive interviews were conducted to thirty eight employees with various job positions in these agencies. Themes and categories were established to highlight their perceptions. The results showed that the frontline workers in these agencies provide different work solutions in overcoming the dilemma of rigid work environments.

Keywords: Bottom-up approach, frontline workers, non-profit organizations, new street level bureaucracy, policy implementation, people processing organizations, street-level bureaucrats, the War on Poverty Program

INTRODUCTION

This paper attempts to delineate the theories of policy implementations that focus on people processing organizations particularly the non-profit organizations and the frontline workers. The research analysis clarifies assumptions that have been made

by other scholars by presenting alternative solutions to problems encountered by these agencies. Consideration of these variations is essential for the future improvement of not only the organizations that deliver welfare services but for the legislative process that undergirds them. This paper illustrates the results of frontline workers using discretionary action to facilitate their work and to deliver services to needy clients. Rigid work environments influence

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workers' behaviour and significantly impact the clients' access to agency services. Thus, this paper introduces several feasible ways to overcome rigid work environments in people processing organizations.

The term "street level bureaucrats" used by Lipsky (1969, 1971, 1976, 1980), supported by other mainstream scholars such as Prottas (1979), Weatherley (1980), Elmore (1979, 1980), and Hjern (1982) has made a profound contribution to the study of frontline workers. Their fundamental idea is that the frontline workers in government offices may modify or redefine agency policy to overcome day-to-day problems encountered with clients. Smith and Lipsky (1993) extended their prediction on the frontline workers' behaviour to non-profit organizations, particularly those agencies processing clients' information. They predicted that the frontline workers are the new street level bureaucrats that are likely to apply their personal discretion in determining benefits and opportunities for their clients. The application of discretion by the frontline workers triggers the way policy is implemented at the bottom in the non-profit community organizations. This situation is referred to by Lipsky (1969, 1971, 1976, 1980) and Smith and Lipsky (1993) as inevitable. It raises an essential question for the researcher of whether or not the frontline workers in the nonprofit community organizations behave as predicted by Smith and Lipsky (1993) in providing welfare services to the needy communities.

A few scholars like Goodsell (1981), Meadow and Menkel-Meadow (1985), Finlay, et.al (1990), Keiser and Soss (1998), Kaler and Watkins (2001) have analysed critically the Lipsky's model of behaviour of the street level bureaucrats. They applied Lipsky's street level bureaucracy principles to study various programs in the public agencies that provide child support program, food stamps, Medicaid, and AFDC, medical residencies, and community based family planning in Kenya. Based on these scholars' research, workers' behaviours have been examined without distinguishing the entity of the organizations as either public or non-profit. The gap displayed in these scholars' research allows this article to further analyse the workers' behaviours, specifically in the non-profit organizations. This study is important to the bottom-up policy implementation approach, as workers are viewed as mediators of policy to people. As their roles and actions augment the policy process, assessing the implications of their discretion is vital to understand the framework of top-down and bottom-up approaches.

THE ECONOMIC OPPORTUNITY ACT OF 1964

The involvements of the non-profit community organizations in providing welfare services are supported legally by the Economic Opportunity Act of 1964. This act legitimized the War on Poverty program declared by President Lyndon Johnson in 1964 and it was a crucial step

in combating poverty nationally (Levitan & Taggart, 1976; Lowi, 1979; Givel, 1991; Clark, 2002). The philosophy behind the Economic Opportunity Act of 1964 addressed the need to redistribute the existing wealth to the poor and to provide opportunities for the needy to earn a decent living and to maintain their families at a comfortable living standard.1 The War on Poverty program was administered by the federal Office of Economic Opportunity to set standards, procedures and eligibility guidelines. This policy also adopted a coordinated approach to alleviate the causes of poverty by concentrating on several major provisions as outlined in Title I through Title V.²

As the strategy is centred on providing opportunities and developing skills through education and training, this legislation emphasizes a strong collaboration among the federal, state and local governments. A combination of intergovernmental resources is fundamental, as the War on Poverty is viewed as a national issue. Besides this cooperation, the War on Poverty legislation has encouraged the community organizations to participate in helping the government to combat poverty as stipulated in Title II of the Urban and Rural Community Action Programs of the Economic Opportunity Act (Moynihan 1970; Brauer, 1982; Haveman, 1987). Title II of the bill also authorizes the federal financial assistance to community action programs as well as giving technical advice. Programs must be developed and

The requirements for Community Action

conducted at a community level to combat poverty. This is based on the belief that local citizens understand their communities best and they will initiate ideas, resources, and sustain good leadership. Furthermore, Title II of the bill recognizes the need for community programs to be varied and flexible in their approaches in order to meet the local needs and interests. Therefore, programs may be developed in urban and rural areas or wherever poverty is found.

Financial assistance under the Title II is made available to organizations that show concrete progress toward combating poverty and causes of poverty. Organizations that are competent to implement such programs could be the public or private agencies or a combination of both that has the resources or capacity to develop, coordinate and operate an effective community action program. This title directly encourages a maximum community participation in order to reach individuals who are in need. Community organizations are selected strictly to ensure that the chosen community agencies possess the ability and capacity to implement poverty programs successfully.

Programs (CAPs) to be developed based on local needs and interests, as addressed in Title II of the Economic Opportunity Act (1964) were closely regulated by the

government and became highly political (Greenstone & Peterson, 1973). Generally the chosen CAPs comprised of educated people to manage their organizations, and

¹ Congressional Quarterly, Congress and the Nation, 1965-1968 (Washington D.C., 1969) Vol. 11, pp. 650

² Economic Opportunity Act, Pub. L. No. 88-452, 88th Cong., 2d Sess. 78 Stat. 508 (pp. 2900-2911)

they possessed great advantages to write better proposals for federal grants than the unselected community agencies. In this case the chosen CAPs which were mostly located in urban cities had a better chance than the CAPs in rural areas (Greenstone & Peterson, 1973). Furthermore, to generate competition among the community action agencies is unhealthy and it appears to be inefficient because it delays the implementation of programs to alleviate poverty. As a matter of fact, to treat poverty as a political condition is a risky matter because the urban political power is resistant to change, although following a federal centralized plan would allow speedy funding distribution to state and local agencies (Greenstone & Peterson, 1973).

Following this critique, there has been a widespread disappointment that the implementation of War on Poverty program failed to solve the problems of poverty. Several scholars, Dolbeare and Hammond (1971), Piven and Cloward (1971), Van Horn and Peter (1976), Aaron (1978), Porter (1976), Henig (1985), and Haveman (1987), offered reasons for the failure of this program such as overly broad policy mandates, communication distortion and misinterpretation, federal versus local diversity and interests, and different priorities. Other additional critiques included the lack of information and research, and unfair competition between rich cities and poor cities that affect grants distribution to the poor. All these critiques asked the government to review its administrative weaknesses and came up with a better plan

to improve their management of poverty policies.

THE OMNIBUS BUDGET RECONCILIATION ACT (1981) – OBRA

The Community Action Programs in the War on Poverty were asked to combat poverty, but they had little access to the policy making process, and they were weak in financial resources (Greenstone & Peterson, 1973). On the other hand, OBRA³ marked the federal government's retreat from directly administering the Great Society Program of the 1960s. OBRA of 1981 provided better power decentralization from top to bottom than the Economic Opportunity Act of 1964 (William & Aponte, 1985). The decentralization of the administration from the federal to state level reduces paper work complexity, and it allows better control over local community agencies with regards to policy administration (Givel, 1991). As a result, this autonomous flexibility provides some leeway for local agencies to plan programs and to meet local needs and demands accordingly.

Moreover, as OBRA of 1981 designated state agencies to administer the Community Service Block Grant as well as to approve or disapprove local agencies' applications, OBRA also protected the existing agencies from severe budget reduction by extending community agency funds until 1984, provided that the existing agencies were entitled to receive funds in 1981.⁴ Although

³ Omnibus Budget Reconciliation Act, Pub. L. No. 97-35. 97th Cong., 1st Sess., (1981) pp. 1-1668

¹ Ibid, pp.397

OBRA's main objective is to reduce federal spending for a certain period of years, it also represents a major transition from centralization to decentralization, and from federal to state administration of community service block grant. Presently, the Department of Housing and Community Development for each state works as the director.

OBRA of 1981 emerged as a turning point to improve the administration of antipoverty programs by decentralizing antipoverty programs from federal to state authority. Implications of OBRA on administrative issues are as follows:

- It simplifies the layers of grant distribution from federal to state authorities, thus it reduces unnecessary delay.
- It minimizes the administrative hurdles, allowing states to determine grant entitlements.
- Section 321-2 of OBRA simplifies complex requirements for grant applications by requesting community agencies to state their program objectives and the description of the projected use of funds.

Furthermore, OBRA as a budget resolution legally recognized the need for non-profit organizations to participate in providing welfare services to the public as a way to reduce the federal budget. The impact grows continuously when a number of non-profit community agencies participate actively in providing and delivering welfare services to the local communities. In fact, OBRA requires public hearing on the spending of Community Service Block Grants under revised section 104(a). This requirement allows the public to access information regarding the proposed community development, housing activities, comments and new or immediate needs in the communities.

The implications of two pieces of legislation on non-profit organizations' participation and antipoverty programs can be viewed in two ways. The first is legal recognition to legitimize actions, and the second is legal channel as a means to achieve an end. The former is used to legitimize antipoverty programs and to gather support nationwide without much controversy. The latter is manifested through legislations to set up antipoverty programs, participation from community agencies and elimination of changes in unnecessary bureaucratic administration. For instance, OBRA has helped the community agencies to reduce layers of unnecessary bureaucratic procedures, including grant approval and distribution, speed up antipoverty programs to be implemented as well as encourage the local non-profit community agencies to apply for grants. The antipoverty programs that are targeted locally are manageable and communities in need can be reached feasibly. Thus welfare services could be delivered to needy people efficiently.

NON-PROFIT COMMUNITY ACTION PROGRAM: THE NEW STREET LEVEL BUREAUCRATS

There are several important variables related to the study of frontline workers and the Smith's and Lipsky's (1993) prediction on the new street-level bureaucrats in the non-profit organizations. Smith and Lispky developed their theory on the new street level bureaucrats in the nonprofit organizations and their prediction emphasized rigid work environments that encouraged workers to exercise discretion. Factors such as insufficient funds, shortages of staff, mounting paperwork, ambiguous and voluminous rules, and conflicting agency goals are reasons for the new street level bureaucrats in the non-profit organizations to exercise personal discretion. A worker's personal discretion was manifested through rationing and routinizing that led to bias, inequality and discrimination in delivering services to clients. Additionally reasons for such outcomes were due to workers in non-profits organizations receiving low wages, few benefits, and facing job insecurity. Consequently, these conditions discouraged the workers from being loyal to the organizations and undermined their commitment toward delivering good services to clients (Smith & Lipsky, 1993). Therefore Smith and Lipsky (1993) assumed that discouraging work conditions affect workers' commitments that will in turn lead to bias, inequality, and discrimination in their services to the clients.

Community action programs are hope for the War on Poverty program to

facilitate antipoverty programs. Their participation is vital to improve the lives of the needy populations in their own community. These agencies are formed and operated in their own community and serve the eligible residents only. Tri-City Community Action Program (Tri-CAP) serves residents of Malden, Medford, Everett, and other surrounding areas such as Melrose, Stoneham, Winchester and Woburn while Cambridge Economic Opportunity Committee, Incorporated (CEOC) is concentrated in Cambridge and Somerville. Both agencies are located in Massachusetts and they receive funds from the Community Service Block Grant (CSBG) and they deliver some similar services to the needy communities. Additionally, they share a fundamental goal as the non-profit community action agencies that are established to alleviate poverty. They channel their antipoverty programs to help needy people gain self-sufficiency: sufficiency in basic needs, sufficiency in improving life conditions, and sufficiency in maintaining hope for the future.⁵

Intensive interviews were conducted with a total of thirty-eight respondents in the Tri-CAP and CEOC agencies. Using open-ended interviewing questions and an active probing technique, statements from respondents were recorded and transcribed. The sample represented a wide range of employment levels that ranged from interacting with clients to processing clients' applications to supervising workers. Access to workers in both community agencies was

⁵ Tri-CAP and CEOC agencies' brochures and bulletins.

partly determined by the agencies' directors because they identified who were to be interviewed. Then, each person interviewed recommended or identified other colleagues to be interviewed. The respondents included were directors, assistant directors, managers, secretaries, attorneys, paralegals, supervisors, collation specialists, benefit specialists, parents-involvement specialists, coordinators, advocates, fuel generalists, family social workers, translators, and volunteers. Categories and themes reflected the perceptions of those interviewed but they were not verified further.

Insufficient funds and shortages of staff

The most fundamental dilemma in both agencies based on workers' descriptions is insufficient funds that lead to shortages of staff, inadequate facilities, restricted intakes, limited benefits, small programs, and inconvenient locations. These limitations prohibit agencies from expanding or improving their programs to meet people's needs. Shortages of staff create a situation where an employee has to deal with multiple tasks, job overlapping and overworking. This financial scarcity prevents agencies from building a sufficient work force to overcome the mounting paperwork, increasing applications and demands. As a result, workers have little communication among colleagues due to mounting work, and it discourages collective teamwork. An individual's attitude toward work may create an unfriendly environment and thus little cooperation can be garnered. Furthermore, an employee may question an agency's

reward system when asked to do more jobs with fewer benefits than others.

Moreover insufficient funds limit an agency's ability to buy up-to-date technologies to keep up with the escalating applicant records and files. Frequent system breakdowns slow the workers productivity, and loosing data of the established records and files is discouraging when workers have to double their work time to retrieve files manually. The insufficient funds also limit an agency's ability to improve the facilities. For instance, Tri-Cap has three divisions of service where each is located in a different location. These different locations become an issue because the distance limits smooth communication and easy access for clients. In fact, the Tri-CAP energy and weatherization program is located far from the central city where transportation and parking become issues. Additionally the building needs repair and renovation.

Smith and Lipsky (1993) predicted that insufficient funds leads to shortages of staff, low wages, few benefits, and face job insecurity, and results in encouraging workers to exercise personal discretion that leads to bias, inequality and discrimination. However despite these problems, both Tri-CAP's and CEOC's workers show their commitment to serve the clients. They apply personal discretion on a case-to-case basis particularly when dealing with emergency cases. Workers described their willingness to cut screening requirements when they have to face the elderly and the homeless at the food pantry, substance abuse users, and domestic violence victims. Thus, the insufficient funds and shortages of staff may not influence the workers' decisions to exercise personal discretion in a way that deprives their clients' access to assistance and benefits.

Paperwork and Ways to Get Things Done

Mounting paperwork is tremendous for workers in these agencies, especially for programs that are funded by the government. Most workers admit that paperwork is excessive in their daily jobs. Paperwork includes applications, verifications, follow-ups, appeals, approvals, and monthly/annual reports. Smith and Lipsky (1993) predicted that mounting paperwork leads workers to ration and routinize their daily jobs by simplifying workloads by cutting back on screening requirements, limiting access to benefits for clients, withholding information and delaying services or increasing waiting hours.

Most workers are likely to cutback screening requirements when it comes to emergency cases. Workers attend to a client's emergency needs first and admit to doing the intake later. Workers at the pantry also admit that they will work around an issue, such as proof of residency or social security number, especially when dealing with the homeless, the elderly and perishable food products. Interestingly, the workers admitted that they do not simplify their jobs by limiting access to benefits for clients, withholding information, and delaying services or increasing waiting hours. They described the followings as the ways of overcoming mounting paperwork;

building teamwork, working overtime, bringing work home, and hiring volunteers or seasonal workers during the busiest enrolment seasons.

Therefore, Smith's and Lipsky's prediction that new street level bureaucrats in the non-profit organizations use routine and ration to overcome excessive work does not hold true. The workers explicitly addressed the need to have good teamwork to cope with the organizational demands and the client needs. Most workers also claimed to work overtime and during weekends to keep up with the excessive office work while staying focused on delivering good services to the clients. Dividing jobs among colleagues helps to speed up their work, as each one has his or her own work to complete. In addition hiring volunteers and seasonal workers helps to minimize excessive workloads. The overhead costs are minimized with unpaid volunteers and paid seasonal workers who work only during intake seasons and resign later. In fact, an individual's skill in organizing work also helps to manage excessive workloads within time constraints, as one has to know which work needs to be prioritized to meet deadlines.

Rules and Guidelines: Volume and Clarity
Before further analysis of clarity and volume
of rules and guidelines that is applied in both
agencies, Smith and Lipsky (1993) predicted
that ambiguous and voluminous rules lead
workers to exercise personal discretion by
modifying rules through ration and routine
that result in depriving clients' access to

benefits and services. Although workers admitted that unrealistic guidelines and rules exist, the elements of lobbying, advocating, and attempting to work around the issues showed different results from Smith and Lipsky's (1993).

The federal income guidelines are the main rule that these community agencies refer to in processing their clients' applications. Additional guidelines such as selection criteria, income statements, proof of residency, household size, Social Security number, immunization records for childcare and Head Start, and the Head Start standard performance manual are also mandatory for workers. Although workers believe that these guidelines are clear and easy to follow, guidelines such as income standards are unrealistic to conform to the present standard of living in Massachusetts. Since the federal income guidelines are a fixed standard that applies to all states, this federal standard does not match the regional expectations.

For example, the income guidelines are unrealistic for the low-income families in Massachusetts and New England. The federal income guidelines automatically deny services to a family of three with children that is earning more than the given income standard. Families who fall above the income standard are still poor and they are in dire need of help, but they become ineligible because their income is referred to by the federal income guidelines as "over income." In reality, people live with a net income instead of gross income. These federal income guidelines are unrealistic and

they deprive the needy people eligibility of welfare services. Therefore agencies have to provide "over income" slots, especially for childcare programs for the working poor to be eligible. This service provides 10% of space availability for children to be part of the childcare programs. However, the 10% over income slots are inadequate to supply the high demand in childcare for working poor or single parents.

These agencies are persistent in lobbying the federal government to increase the income guidelines in order to fit this regional standard. Workers' decisions to treat substance abuse, domestic violence and homeless issues as emergency cases allow them to be flexible in processing intakes for clients. As a result workers in community agencies are aware of the unrealistic income guidelines and the difficulties underlying rules regarding benefit eligibility.

Other guidelines that received criticism from workers are the Head Start standard performance manual and the Head Start partnership agreement. The former guideline is tremendously thick and it is discouraging for workers to follow each and every rule thoroughly. Therefore workers become selective in choosing which rules and issues are important to parents and what syllabus is important to be taught in classrooms. The latter is structured with questions that may suggest that Head Start families are in a total mess. Workers are concerned for the well being of the Head Start parents and want their roles to be more as a support team than as a credentialing team. Family service workers believe that the Head Start

partnership agreement should be shorter, with general questions rather than questions that are likely to justify a family condition. For instance, the partnership agreement requires workers to ask about members of the household, problems encountered at home, spouse, gender, and any type of assistance the family is receiving such as food stamps, WIC (Women, Infants and Children), fuel assistance, housing, or rent subsidy. If the family does not know about these services, workers are obliged to inform them. Other questions in the partnership agreement include job training, educational and work goals. In addition workers are mandated by law to ask about child abuse or neglect as well as proper medical and dental care for children.

Further criticism is given to the food stamp and the Department of Housing and Urban Development (HUD) definition for homelessness. The food stamp form is voluminous and unnecessary, with 12 pages of inquiries. The HUD definition of homelessness is vague enough that it would be difficult to determine if someone is homeless, thus it denies him or her. The rules for food stamp application and the HUD definition for homelessness limit poor people from getting the help and resources they need. Workers in community agencies have to work around these problems by representing their clients to the Department of Transitional Assistance office (DTA) for food stamps, advocating for their clients at the DTA or Social Security Income offices (SSI), filing an application for their clients, and helping the homeless with food and referrals to churches for shelters.

Rules and guidelines limit workers from delivering services to needy people on several essential issues with regards to income guidelines, job manuals, definitions for homelessness, and food stamp requirements. Despite these limitations that impede workers abilities to deliver their services to needy people, they attempt to work around the issues with the intention of making sure that needy people get what they deserve. Workers' efforts, such as becoming a representative for their clients to the DTA office and advocating for their clients' rights to services, are important to be recognized. Their efforts also show their seriousness in helping clients, and their roles as community service workers who professionally dedicate themselves to helping the needy people.

Agency Goal: Is there a conflict?

It is essential to look at possible conflict underlying an agency's goal as predicted by Smith and Lipsky (1993) that encouraged workers in the non-profit organizations to exercise personal discretion by rationing and routinizing daily work that leads to bias, inequality and discrimination. The analysis regarding agency goal shows changes in both agencies' goals as ways for these agencies to adapt to new demands and needs rather than inciting conflict. Adding new programs and new goals work as a means to better serve their needy communities. Besides, every worker has his or her opinion of the agency's goal because each person perceives the goal from the different programs in which he or she is involved; therefore it is expected to hear that the agency goal varies and changes based on individual perception.

As both agencies are non-profit antipoverty organizations, their ultimate goal is to alleviate poverty by helping needy populations. Help is delivered to the needy by providing services that are fundamentally required by local communities. Help is also delivered in the form of empowering needy populations to improve their life conditions through employment training, education, advocacy, and one-to-one guidance. In addition to the goal of alleviating poverty by helping one person at a time, these agencies commit to providing solid help to the needy people for their basic needs such as food and shelter, pro bono legal service, energy and fuel assistance, childcare and Head Start.

Most workers admit that their agency's goals have changed due to service expansion and new program addition. The more services they provide, the bigger the goal becomes. The goals change and evolve based on the most urgent issues at hand. Cases of eviction involving people with mental illness are prominent and community agencies are adding new programs and revising their goals to meet the needs. Cases of substance abuse users who are rehabilitated and need equal access to subsidized housing are also essential to be added to their agency's goals. The relationship between goals and means is intertwined. The majority of workers acknowledge their agency's main goal is to alleviate poverty, but the means of achieving this goal are varied depending on programs, emergent needs or service expansions. Despite changes and additions to each agency's shorter-term goals, series

of observations show that both agencies' goal to alleviate poverty by helping needy people has remained central.

Acknowledging the roots of poverty and the diversity of approaches to alleviate it, adding new approaches to ameliorate poverty through new programs and service expansion are ways to keep agencies up-todate with new demands. Coping with changes and becoming alert to new community needs is a way for the community agencies to adapt to their complex environments. New cases and approaches indicate that community agencies are reaching out to their communities to deliver solid assistance to them. In fact, most workers in these agencies referred to themselves as community advocacy groups. New cases and approaches bring new opportunities for the community agencies to propose new grants and to keep Congress on their toes with contemporary issues. Federal and State funding mechanisms are continuously refined by debating these issues.

Furthermore, these local agencies have evolved from simple service delivery agencies into client-service agencies. A community agency is not only a medium to deliver services to needy populations but it extends its role to empower them and to improve their unfortunate conditions with training, skills, education, and guidance by helping the clients set an agenda. Workers provide constant follow-up with their clients once an agenda has been set to ensure that clients receive the services that they need.

Overall, the majority of workers show commitment and dedication to their jobs and agency. When workers value their jobs as rewarding work, this motivates them to treat clients well. Stressful working conditions such as excessive paperwork, time constraints, fraudulent cases, demanding and misbehaving clients are situations that workers described as events that make their jobs challenging. In addition, limited resources and rigid work environments can encourage workers to build teamwork and this has significant implications for the "new street-level bureaucrats" theory and for policy analysis.

IMPLICATIONS ON PEOPLE PROCESSING ORGANIZATIONS

Workers utilize their discretion in delivering services to clients based on needs and circumstances. Despite processing activities such as screening, classifying and labelling clients with new social status and public identity, workers in both Tri-CAP and CEOC do not treat clients as products. They exercise discretion to help their clients with emerging needs despite a set standard of requirements determined by the government. If the requirements limit the intakes of clients but the resources are available for other low income people, then these agencies utilize resources efficiently. The more the eligible people receive assistance, the better distribution of benefits is performed; the more needy people they help, the higher feeling of accomplishment that rewards them. If the standard requirements deterred workers from helping the needy, then workers would find ways to work around the issues in order to help them get the assistance they deserve. For example,

workers allow clients to receive services and assistance first and they will do the intake and the follow up later; workers distribute foods to non-resident homeless, letting them enjoy the meals despite the eligibility requirement for food pantry, because they determine that foods are available and perishable. Their humane intuition factor is in use here; workers lobby legislators and advocate for changes in federal income guidelines that are unrealistic to assess a household income in Massachusetts/New England; workers become advocates for clients who need help in applying for or appealing to public benefits such as Food Stamps, Social Security Disability Income (SSDI) and SSI; workers become mediators between landlords and clients who need help with eviction notice.

The quest for efficiency in service and cost is a goal for most types of organizations. Agency work is organized with divisions and specializations to ensure that service is delivered efficiently. Antipoverty community agencies are encouraged by the War on Poverty and OBRA as efficient mechanisms to deliver welfare services. They are able to reach out to the community and to increase community participation simultaneously. The advantages are; first workers in both Tri-CAP and CEOC embrace a multi-tasking strategy through teamwork as a way to perform their daily jobs efficiently. Workers accept the fact that resource scarcity is always an issue that limits agencies from hiring more workers. Thus one way or another, workers still need to finish their assigned jobs. Building teamwork is an efficient way to complete their jobs. Second, both agencies have volunteers and seasonal workers that help agencies support their daily work. This strategy is cost-efficient, as it does not require agencies to pay long-term benefits to seasonal workers or to reward volunteers.

The emphasis on efficiency in nonprofit community organizations as people processing organizations allows these agencies to behave differently from the public welfare agencies. Efficiency is a catch phrase with many ways of expressing and organizing it. Efficiency is a category that remains consistent in any form of organizational studies because human and non-human resources are central for accomplishing goals and objectives. Therefore policy development can benefit from the study of non-profit community agencies, particularly when these organizations offer services and cost advantages to their clients and society.

STREET-LEVEL BUREAUCRACY: AN EVOLUTION OF LIPSKY THEORY

The use of the term "bureaucrat" has been applied in many contexts. Interestingly one may argue that when Lipsky (1969, 1971, 1976, 1980) first labelled frontline workers as "street-level bureaucrats," he was referring to the public officials that exercised personal discretion in dealing with clients directly in daily work. Lipsky viewed workers at the bottom as bureaucrats because they were public officials too, like their top-level bureaucratic colleagues. Furthermore

this does not conclude that "bureaucrat" necessarily carries any negative connotation such as delay or rigidity.

In fact, the Weberian model of bureaucracy is rational, centralized and objectively determinant. Thus this Weberian model promotes the essence of rationality in approaching human decisions, goals, accomplishments, tasks applications, environmental selection based on scarce resources and the ability to resolve issues embedded in organizations. Parsons (1974) observed that Weber has formulated his organizational theory in the systematic approach that is concentrated overwhelmingly on normative patterns of rationality. In this way an organization's efficiency can be achieved through discipline and reliability in exercising control over human beings (Parsons, 1974). This hierarchical model enhances an organization's efficiency through a systematic division of labour, discipline and control, organized rules and regulations, competent administrative conditions, qualified candidates, and a standard system of rewards. Therefore, this bureaucratic administration in an organization results in the essential qualities of efficiency, formality, rationality, calculability, knowledge ability and technical competency.

Daft and Steers (1986) argued that while this bureaucratic model might be needed in large-sized organizations where a central system is able to bring together a large number of people and tasks to achieve organizational goals, for smaller organizations, adversarial bureaucratic

procedures are unnecessary because tasks can be supervised or accomplished by a single or a few individuals. In fact, bureaucratic procedures such as standardizing, regulating, monitoring, and controlling may reduce flexibility and slow productivity and efficiency for small size organizations. Therefore, the question of whether or not bureaucracy promotes high performance is a matter of size and fit (Daft & Steer, 1986). Having bureaucratic procedures may be vital for organizations as they expand in size, employees, tasks, and networks, but too much of bureaucracy may disrupt simple functions in a small-scaled organization.

Furthermore, Hummel (1977) argued that Weber's intention to create a bureaucratic system through division of labour, specialization, training and hierarchy of duties is to maintain control and to produce stability and productivity. However Weber's bureaucracy has unintentional effects: hierarchical authority leads to a powerful centralized system that distorts training, specialization, division of labour and rewards. One extreme result may be to reduce stability and productivity. Therefore bureaucracy is open to many interpretations and it is up to individuals to balance fit with function.

The use of scientific management in a rational top-down bureaucratic model has been criticized by bottom-up scholars like Lipsky (1969, 1971, 1976, 1980), Lipsky and Weatherly (1977), Elmore (1978, 1979), Weatherly (1980), Hjern (1982), Hjern and Porter (1981). Lipsky's (1969,

1971, 1976, 1980) street level bureaucracy theory was revolutionary in late 1960s because it introduced the idea of looking at the implementation processes from the bottom-up in contrast to the rational topdown approach. Lipsky was concerned with the low level public employees who utilized the discretionary nature of their jobs to wield substantial power and in effect create policy for their agency. This term has been defined by Smith and Lipsky (1993) to designate contractual regimes, where non-profit organizations that receive grants from the government will have workers that behave similarly to public officials. A simple reason is that the non-profit organizations have to comply with government's rules and standards that shape work ethics among workers. Thus work ethic is assumed to be similar for both the public officials and the street level bureaucrats, who may also ration and routine work that can result in bias, inequality and discrimination.

Non-profit workers view clients as human beings who deserve to be treated with respect instead of "products." Not only clients do not want to be treated harshly, but workers emphasize that being mean to clients would not make their work easier. Moreover, top administrators train their staffs to respect clients regardless of the clients' situations. They may come to community agencies with urgent issues such as substance abuse, domestic violence, homelessness and eviction, and frontline workers have a client-oriented attitude in dealing with them. As a result this gives a new perspective on the frontline workers

in non-profit organizations who have been labelled "new street level bureaucrats." The following section suggests that this new generation of workers may be better and more humane in delivering services to needy people.

PROBLEMS FACED BY NEW STREET LEVEL-BUREAUCRATS

As discussed above, workers in both agencies experience similar work environments. Rigidity is a problem that exists in many organizations due to limited resources, regardless of their status as profit, non-profit, private or public entities. Ways to cope with work environments presented in Tri-CAP and CEOC are different from Smith's and Lipsky's (1993) ration and routine because the former allows many more advantages for clients. First, ration and routine lead to work simplification that results in cutting access to welfare benefits, withholding information and delaying services to clients. On the other hand, ways to cope with work environments in Tri-CAP and CEOC allow better access to service provisions, benefits, and information on other welfare services through referrals.

Second, ration and routine lead workers to apply personal discretion in modifying rules and guidelines based on personal interest as an easy way to lessen their daily jobs. On the other hand, workers in Tri-CAP and CEOC exercise their personal discretion on a case-by-case basis especially when dealing with emergency cases, and workers acknowledge the federal rules and guidelines that are important to be followed simultaneously.

Third, ration and routine alter an agency's goal when access to services and benefits is denied to clients, but teamwork and overtime allow workers to promote an agency's goal by ensuring that access to services and benefits eligibility are delivered to needy people efficiently.

Fourth, ration and routine result in bias, inequality and discrimination of services when personal discretion leads to favouritism and privilege. On the other hand, teamwork, overtime, and work simplification on case-by-case basis allow workers to deliver services and care to needy clients respectfully.

Ackerman (1996) argued that since non-profit organizations are motivated by ideas rather than profit, they offer altruistic services in terms of quality and cost advantages. This research findings support Ackerman's (1996) in that workers in both community agencies try to place the interests of the needy community over agency or individual interests. Considering the limited resources underpinning welfare programs, the goal to help the needy is a driving force that can make nonprofit antipoverty agencies a vital part of the community. Likewise, altruism can become fundamental goal for antipoverty community agencies that could result in variations in workers' behaviour. Table 2 of behaviour variations gives a perspective for future research, considering that when personal discretion is applied at the bottom, policy outcomes may be shaped differently by the "new street level bureaucrats."

MOVING BEYOND THE "NEW STREET LEVEL BUREAUCRACY"

The adaptations for coping with rigid work environments that have been discussed are to be viewed as possibilities that one should consider. A few reasons to believe that local non-profit antipoverty agencies are capable of providing services better than the old "new street level bureaucrats" include supportive arguments from scholars. First, community agencies that came from the 1960s and 1970s mostly evolved from social movements. The researcher believes that the roots of social movements in both Tri-CAP and CEOC foreshadowed how these agencies would deliver their services to clients; they act locally to rejuvenate society as a whole. MacCarthy and Zald (1977) emphasized the origin of local community organizations that progress from social movements into complex organizations. They argued that a social movement is based on a set of beliefs and opinions that reflect preferences for changing social structure through a redistribution of resources. As a result, a social movement is presumed to be an instrument of metamorphosis that alters societal structure and reimburses society. Freeman (1983) supported this argument, and he provided an example of the national welfare rights organizations in the 1960s and 1970s that began as antipoverty agencies and were formed to help poor people. Many also originated from the community organizations established by liberal church groups and urban civil rights activists, and these groups were scattered throughout the states.

Second, scholars like Rich (1980) and Schuler (1996) argued that community organizations can become agents of change to revitalize society. Community organizations and their networks are the nerve system of human society, and a call for community involvement is vital in addressing concurrent social problems such as poverty, crime, unemployment, drug use, and for meeting basic needs. These problems are manifested within the community and are best resolved by the communities. A strong community commitment would be able to redirect the government resources to facilitate meeting the community needs.

Third, the "not-for-profit" nature and the absence of ownership argued by Weisbrod (1989), DiMaggio and Anheire (1990), Howlett and Ramesh (1995), and Ackerman (1996) allowed the non-profit organizations to offer low cost services to people. Inexpensive services are the basis for quality service delivery and cost efficiency. This is supported by workers in Tri-CAP and CEOC who are enjoying their jobs without complaining about their agency's reward system, treating clients deservingly, encouraging volunteers and hiring seasonal workers to overcome the busy intake seasons while reducing costs.

Stemming from the substantial contributions made by scholars on non-profit community organizations, it is believed that the present antipoverty community agencies such as Tri-CAP and CEOC are "client-centred" organizations that offer fair services to needy people. A "client-centred" service is the next step in understanding

workers in the evolution of antipoverty agencies. Just as new street level bureaucrats in nonprofits were predicted by Smith and Lipsky (1993) to respond similarly to public street level bureaucrats, the "client-centred" service providers have led to more creative ways to solve the problems of rigid work environments, resulting in better services and benefits allocation for clients.

CONCLUSION

The rules and guidelines designed for the welfare programs are avenues to ensure that limited resources are utilized to achieve goals and to alleviate poverty by distributing resources and services to help needy people. Further recognition is that rules and guidelines are ways to assess standard eligibility, to allow consistency in decision making, and to provide solutions for anticipated outcomes. As these formal rules and guidelines are codes of action that are determined by the top level decision makers, they are presumed to be followed. These rules remain as a standard procedure that applies to all, but rules and guidelines can be modified at the bottom based on agency expertise and personal discretionary power.

The actual policy rules and guidelines are modified at the bottom when immediate needs and emergency cases require expertise to decide what is doable and what is the best that fits in such circumstances. In fact, errors in exercising personal discretion such as favouritism can be avoided by providing the right help to the right person at the right

time without overlooking basic rules and guidelines for eligibility. Since problems could be similar but never the same, they cannot be treated alike. As a result, rules and guidelines remain as basic references that should be adjusted on a case-by-case basis to provide the right help and services to the right person at the right time. The application of this action would ensure that the distribution of resources can be delivered efficiently.

The mix of precise rules and guidelines, and personal discretionary power is essential to provide efficient decision making and to deliver efficient services. As rules and guidelines for poverty programs may take years of lobbying and stages of procedures to be reviewed by the Congress, personal discretionary power based on agency expertise is necessary. In addition, an agency's goal to distribute resources and to help needy people is achievable when personal discretionary power is applied accordingly. In fact, since poverty is impossible to be eliminated, the need to continuously find ways to redistribute money and resources is essential. Therefore, community action agencies will continue to exist and evolve.

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