IMPLEMENTATION OF PROGRAM POLICY BY INDIVIDUALS:

A STUDY OF FRONT-LINE WELFARE WORKERS

by

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Submitted to the Department of
Urban Studies and Planning
in Partial Fulfillment of the
Requirements of the Degree of

DOCTOR OF PHILOSOPHY

at the

MASSACHUSETTS INSTITUTE OF TECHNOLOGY

January 1984

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January 1984

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ABSTRACT

This study investigates the manner in which welfare workers interpret and
implement several rules of the program for Aid to Families with Dependent
Children (AFDC). Although program rules are established at the federal
and state level, the "front-line" welfare worker is responsible for
implementing those rules when interviewing clients and determining
eligibility. These rules are intended to limit worker discretion, but
the nature of the rules and agency environment give workers large amounts
of discretion over client treatment.

Data collected in a large Massachusetts welfare office shows that there
is considerable variation among individual workers in implementing
program rules. Fifteen intake workers were observed with respect to
client contact, case dispositions, and case processing times. Workers
with randomly assigned clients appeared to vary as much as 100% in their
case approval rates, processing times, and time spent with clients. In
separate interviews with these and other workers, respondents identified
factors in their job, agency, and environment which they felt influenced
their implementation of program rules and client treatment.

The data suggests that workers in part respond to problems inherent in
the original program rule. Vague wording, conflicting instructions,
scarce resources, role conflicts, and difficult working conditions tend
to make program rules conflict with the real world environment. Workers
appear to modify these rules to make them "fit" the worker's perception
of the environment. The study develops a model for recognizing the
interrelationships among rules, agency factors and the environment.

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TABLE OF CONTENTS

LIST OF EXHIBITS

Chapter 1

THE PROBLEM OF IMPLEMENTING PUBLIC POLICY

Everyone of us, at some time or another, finds ourselves confronting a representative of a public agency who has the authority to grant or withhold the benefits which we desire. These agents may be policemen, social workers, hospital attendants, registry clerks, tax collectors, teachers, or city inspectors. Usually these service providers receive little of our attention and function simply as "stocked characters" in our everyday environment (Goffman, 1971). Although the amount of time we spend with these service providers may be relatively short, the amount of control or support they exercise over our lives can be considerable. The critical influence of these public agents is exercised in at least two important ways. First, by virtue of their agency position and work skills, the service provider can control both the immediate interaction and our future activities in the organization. Second, the providers introduce definitions of the situation -- and of their perceived reality -- to which we must adhere.

Although not usually as powerful as the "gatekeepers" Erickson (1975) identifies, the individual service provider can nevertheless

function as a type of social deflector. Rather than controlling such things as social mobility (as a guidance counselor might do) or advancement (as a review board might do), these providers can control the extent to which an organization will solve our particular problem or met our needs. Social workers, for example, have control over who receives what kinds of services, and the degree of attention may determine whether more serious needs will occur in the future. Similarly, teachers can focus their efforts on only the brighter students in the class, resulting in a loss of learning for those not selected. Finally, police have the power to determine the extent to which our behavior must fit the social and legal norms, and, if we are found to be deviant, our subsequent treatment in the correctional system. The decisions on the part of the provider can have not only long term impacts on the recipient, but "when individual cases form patterns, such decisions may have consequences for society as a whole, especially if these patterns are determined by race and ethnicity" (Erickson, 1975, p.45). Thus, in our experiences as a client of a public agency, the service provider can play a particularly important role in our life.

But from the organization's perspective, the service worker has an even more critical role, for it is the service provider who actually implements the policies of the organization and who represents the organization to the client, public, and outside world. In simplest terms, the actions of the worker are the actions of the organization, and the worker can make decisions about the client that can substantially

affect the client's chances in life. The selection and designation as client can, in many instances, initiate the process leading to self-fulfilling prophecies of behavior. Thus, the recipient of service does not experience the social policy set by government but instead experienceses the daily reality of waiting rooms and the service worker's actions (Piven and Cloward, 1977, p.20-21). It is the manner in which the service provider chooses to implement agency policy and represent the organization to the outside world that will be the focus of this study.

1.1 Policy Implementation in Bureaucratic Organizations

1.1.1 Accomplishing Organizational Objectives

Organizations are traditionally formed by groups of individuals who wish to accomplish specific goals the members could not otherwise accomplish alone. Individuals acting alone are able to satisfy only a portion of their own needs and desires; to satisfy their remianing needs, individuals must work together in some coordinated fashion. Schein (1970) defines an organization as the

> ...rational coordination of the activities of a number
> of people for the achievement of some common explicit purpose
> or goal, through the division of labor and function, and
> through a hierarchy of authority and responsibility (p.9).

Schein points out that the object of the coordination is not people

themselves, but rather the activities of people. A particular activity
may involve more than just one person and a person can belong to several
organizations simultaneously. But all of the people working in the
organization are striving toward the same goals. In a similar defintion
of an organization, Galbraith (1977) identifies five essential attributes
which organizations possess: organizations are

> 1) composed of people and groups of people 2) in order
> to achieve some shared purpose 3) through a division of labor
> 4) integrated by information based decision processess 5)
> continuously through time (p. 3).

That organizations exist to accomplish a set of goals implies that
the structure of the organization will be designed to achieve those
goals. The goal structure, in essence, becomes the structure for the
hierarchy of activities, and the goals carry with them a variety of
premisies and constraints which are imposed on those activities. As the
organization grows or adopts additional goals, the number of activities
increases and the degree of specialization among activities becomes
greater. In the process of specialization, the functions of policy
making and policy implementation frequently are separated and assigned to
two different groups. A small, select group performs the former function
while a much larger group carry out the activities implied by those
policies. As soon as the two functions are separated, however, the
policy makers must develop ways to insure that the policy implementors
carry out their responsibilities as intended.

1.1.2 Coordinating Members' Roles

Policies and programs created on paper do not function by themselves; people must carry out the programs which will achieve the desired organizational goals. Therefore, programs will include a specification of the individual's behavior who is to perform the program. The program and its behavioral constraints constitute a "role" for the individual, and the role exists independently of the particular person who occupies that role. The theatrical metaphor is used precisely because it denotes that behavior adheres to the part and not the player. Thus, organizations will coordinate roles rather than individuals.

Roles carry with them expected behavior of both a formal and informal type. The expectations are more than just guidelines; they include a qualitative aspect that influences the way in which activities will be performed. Role expectations, according to Sarbin and Allen (1968), include the

> ...collection of cognitions -- beliefs, subjective probabilities, and the elements of knowledge -- which specify in relation to complimentary roles the rights and duties, the appropriate conduct, for persons occupying a particular position (p. 498).

As role imperatives, expectations insure that the enactment will be appropriate and, when generalized, constrain the action of each member into channels consistent with those taken by others in the organization. Each member of the organization directly associates with others who depend on his or her performance in some way, e.g., supervisor,

subordinates, clients, professional associates, friends, who form his "role set". It is the members of the person's role set who largely generate the expectations, prescriptions, and proscriptions for behavior.

1.1.3 Programmed versus Discretionary Behavior

The organization will assign a formal behavior or task to each role usually in the form of a job description prepared by the head of the organization or some personnel specialists. The job description can be one of the strongest influences (expectations) on the actual role behavior because it specifically states the activities to be performed, where, and for how long. Certain roles have not only a job description by the organization, but may also have -- as in the case of the police or government officials -- a legal definition of behavior. The formal rules and regulations of the organization supplement the formal task by identifying other acceptable (or more correctly, unacceptable) behavior of the individual. The formal behavior of the job description, legal codes, and regulations together form the programmed component of the role. Jaques (1956) distinguished the programmed component, which establishes the specific framework within which the role is to be executed, from the discretionary component, which allows the occupant to carry out the activity as he chooses. Thus, a "role" as defined by Argryis (1957) is the totality of the informal tasks, formal (programmed) tasks, and personal acts (discretionary behavior) as organized by the

individual. I will discuss the nature of discretionary behavior in more detail in the next section.

It should be noted that the mix of programmed behavior and discretionary behavior in a single role can vary between the extremes of each, depending upon the occupation, and can also vary across different aspects of the job. The individual may perform both clearly specified activities and independent decision-making during the course of the day. For example, while clerks are often highly programmed by rules, regulations and close supervision, policemen are assigned a wide range of discretionary activities. The predominance of discretionary behavior over programmed behavior in a member's role makes it much harder for the organization to control the manner in which the person carries out his implementation responsibilities. Our interest in improving the behavior of organization member, then, is really an interest in modifying their discretionary behavior; for the discretionary component of the role takes on the significance of influencing the overall effect of the activity.

The behavior of some public agency workers is uniquely influenced by one particular programmed task. Organization members such as police, teachers, social workers, etc. are all programmed to provide some kind of service to "clients" of the organization; service is the primary component of their job description. The client becomes the focal point of the worker's attention and is usually the major recipient of the organization's output. The organization usually has some control over which clients it services, although clients themselves may be voluntary

or involuntary. Voluntary clients are customers in public or private establishments who exercise choice in the consumption of the service. Involuntary clients are usually low-income individuals who, for one reason or another are forced to deal with the public bureaucracy (Lipsky, 1969).

1.1.4 Translating Policies into Rules

If the organization is charged, either by law or by the voluntary association of its members, with carrying out a set of objectives, then operating policies are the general instructions for achieving those objectives. A governing body of the organization formulates general policies and guidelines for achieving the set of desired objectives and passes those policies to the organization's managers for implementation. Management, in turn, elaborates those policies and generates the rules and regulations for the daily operation of the organization. The purpose of rules and regulations, then, is to insure that the various components of the organization -- as well as individual members -- behave in accordance with the overall set of objectives (Gottlieb, 1974). The entire set of rules and regulations is then intended to guide the individual member in the specific tasks of his or her assigned job. Formal rules are the sinews that keep large organizations together and functioning. Indeed, Max Weber listed the principle of rules as one of the key characteristics of a bureaucratic organization: "There is the principle of fixed and official jurisdictional areas which are generally

ordered by rules, that is, by laws or administrative regulations" (Gerth and Mills, 1946, p.196).

It is important to note that the rules generated by both the governing body and the management are not uniform in focus. Kadish and Kadish (1973) suggest that one of the most important distinctions between the types of formal rules is their "restrictive" or "permissive" nature, i.e., designating what individuals can and cannot do. Mandatory rules impose on the individual an obligation for some action (or inaction) and reinforces that obligation through the imposition of sanctions if the rule is broken. Mandatory rules also attempt to foreclose the freedom of choice for the individual member. Permissive rules, on the other hand, authorize the individual to take certain actions but do not impose any obligation or sanction. Under permissive rules, the failure to follow the rule or procedure simply means that the member fails to secure the benefits from the rule or to exercise his power of choice. While the mandatory rule restricts individual choice and behavior, the permissive rule provides a recognized channel for carrying out choice.

Naturally, the mandatory and permissive rules promulgated by management are not the only rules or constraints on individual behavior in the organization. Individual members bring with them an understanding of the broader rules of social conduct and interaction (Goffman, 1967). For example, we are taught as children that it is impolite to keep other people waiting for more than a few minutes or that to greet someone with hostility will likely elicit a similar response from the other person.

The pressure for acceptable social behavior, i.e., according to the norms of our society, introduces yet a third type of rules into the organization setting. I shall refer to these unwritten rules which derive from outside the organization as "normative" rules.

1.2 Sources of Discretionary Behavior

As just discussed, the purpose of rules in organizations is to constrain behavior in accordance with the goals and objectives of the organization. In the interest of accomplishing those objectives, organizations want to discourage decisions or actions which will conflict with those objectives or waste resources. To the extent that the individual's behavior cannot or should not be regulated, the individual has discretion to perform his or her tasks. Webster (1968) defines "discretion" as the "freedom or authority to make decisions or choices," but that freedom can carry with it vulnerability to influence by outside pressure when implementing a rule. With permissive rules, the organization explicitly delegates discretion to the individual and recognizes that workers may vary in their actions as they see fit. With mandatory rules, however, there is no such delegation; the organization expects that each worker will perform the task in exactly the same manner and with the same outcome. With normative rules, the organization simply assumes that the individual will follow socially acceptable behavior,

although the acceptable boundaries of that behavior are much broader. But the existence of discretion in a worker's job is often a function of much more than the decision-making delegated by the organization.

1.2.1 Legislative Ambiguity

Handler (1979) suggests one factor which mitigates the governing of behavior through rules and regulations is legislative ambiguity in the program's creation. Congress, federal agencies, the state legislators, and the state administrative agencies create the statutes and rules for program operation. But in most social service programs the statutory provisions are "vague, ill-defined, ambiguous, and subject to conflicting and competing interpretations" (p. 9). The lack of knowledge, lack of agreement on competing values, and the desire to have agencies develop consistent programs of a technical nature prompts the legislature to purposely leave the statutes ambiguous. If the legislature does not have enough information to solve a problem it may simply define the problem and delegate the task of finding the answer to an administrative agency. If they have the solutions but cannot agree, the legislature may compromise and delegate the conflict to an agency. Or the legislature may not be institutionally suited to continually monitor the problem, e.g., utility rate regulation. As Handler notes, "all three of these reasons for statutory ambiguity and consequent delegation were present in the development of social service programs in the 1950's... "(p.9).

The vague wording of the statutes is often passed to the wording of

the administrative regulations, and delegated from each level to the next lower within the agency. Handler describes this "downward flow" as follows:

> Initially, the supervising agency interprets the statutory language and issues its interpretations in the form of regulations. The drafting and promulgating of such regulations is an exercise of discretion; the agency is making interpretive choices. Not unexpectedly, the regulations are also often vague, so lower level officials in turn have to make choices as to the meaning of the regulations. The process continues down through the administrative structure until the lowest field officer interprets the rules and guidelines for specific cases (p.9).

1.2.2 Bureaucratic Structure and Fragmentation

Handler also suggests that as the delegation continues the amount of discretion given to the worker is enhanced by a parallel source: the complex bureaucratic structure of the public agency itself. Organization charts depicting the agency structure as a pyramid with rules promulgated at the top and carried through a chain of command belie the often uncontrolled activity and hide the vast amount of staff initiated discretion. Just as there are distinct and conflicting goals among legislators who create the agency or program, so there are conflicts among the individual administrators, among agency departments, or among groups with different resources, expertise, or perceptions. The conflicting goals or differing resource bases make it difficult to measure performance or to persuade others to change their behavior. What

occurs, then, is a bargaining of superiors with lower level personnel to resolve the conflict. As Crozier (1964) and Mechanic (1962) have shown, the lower level staff derive their bargaining power from their control of the clients upon whom the agency is dependent, as well as from their own information and expertise.

Another structural factor is that organization members sometimes function outside of the normal confines of the organization or under regular supervision. Organizations exist within some larger framework or environment such as another organization, a community , or a whole society. Organizations share this environment and interact with the other inhabitants as necessary to accomplish the organization's goals; yet they maintain their separate identity according to their particular set of objectives. All the resources, programs, and the individuals common to one set of goals are considered to be part of one organization. The men and resources common to the goals of law enforcement, for example, comprise the organization "police," while the people and resources common to the goals of education form the organization of "school". Both groups have a set of distinct goals and so are separate organizations, but both are part of the larger organization "city government" and the "community". Because the organizations are distinct from one another, we can talk about the boundaries which delineate the extent and composition of their existence.

In small groups, every member serves as a part of the boundary for the organization and so serves as the interface between the organization

and the surrounding environment. As the organization becomes larger, however, there is a greater division of labor and specialization. Instead of members having roles interacting with others both inside and outside the organization, now roles deal predominantly with one or the other. Special roles and programs are developed to perform at the boundary and to interface with those outside the organization. We shall refer to these roles as boundary roles and the individuals who perform them as "boundary personnel". Kahn, et. al. (1964) define such boundary positions as "one for which some members of the role set are located in different systems -- either another unit within the same organization or another organization entirely" (p. 101). Almost every member of a group has some role related contact with individuals outside his unit. This is particularly true for departments within organizations. But our focus for this discussion will be those boundary personnel who spend the majority of time in contact with non-members of the organization (i.e., clients) and whose effective performance depends upon such contact.

The distance of the boundary personnel from the rest of the organization is an important determinant in discretionary behavior. Adams (1976) considers it important that

> the occupant of such a position ... is more distant, psychologically, organizationally, and often physically, from other members of his organization than they are from each other, and he is closer to the external environment and to agents of outside organizations... (p. 157).

Following the gravitational model of influence (Lewin, 1951), the member's distance tends to weaken the organizational constraints and strengthen the influence of the environment. The result can sometimes lead to greater organizational suspicion of member's behavior.

> Conversely, knowledge by the boundary person that he is removed from the parent organization may give him greater behavioral freedom in performing tasks than is possessed by other members and arouse anxiety of how he is perceived back home. (Adams, 1976, p. 157)

The general degree of suspicion will be influenced by whether the organization perceives the environment or clients as being hostile or friendly. An extreme example would be an undercover policeman who's deviant behavior arouses the suspicions of the department.

1.2.3 The Quantity of Program Rules

A third source of discretionary behavior is the sheer number of rules and regulations that have to be followed. Lipsky (1980) points out that even with close supervision and control, the rules:

> ...may be so voluminous and contradictory that they can only be enforced or invoked selectively. In most public welfare departments, regulations are encyclopedic, yet at the same time they are constantly being changed. With such rules adherence to anything cannot be expected (p.14).

Thus, welfare workers and other organization members cannot be expected to invoke all of the rules they are charged with enforcing during their daily routine.

Gottlieb (1974) found that there are a number of factors within the welfare agency itself which tend to work against any type of consistent adherence to the rules on the part of workers. First, there are inconsistencies due to staff pressures.

> A state directive with significant impact on client income not only reached the department past its effective date but was also received in units within the agency at different times. There was general acknowledgement in their staff discussions that work pressures were such that staff would take this up with recipients at staggered times, so that some recipients will have felt the effect of this rule change weeks, perhaps months, before others (p.47).

Second, deviations are a consequence of one's position in the office hierarchy. Gottlieb encountered workers who believed that those higher in the agency were free to go beyond the rules, e.g., in making exceptions or reversals, while other workers were not.

1.2.4 Discretionary Treatment of Clients

Because of factors such as the three just described, it is virtually impossible for an organization to rigidly control the worker in every action. Even if it were possible for the organization to foresee every specific situation or eventuality, the agency's limited time and resources would make extensive rule making impossible. Bureaucratic organizations must, therefore, state the formal rules of application and behavior in general terms and hope that training, sanctions, and other mechanisms will ensure the desired actions on the part of the

individual. As Gottlieb (1974) notes, it is at this point that significant variations in policy implementation can occur.

> They (the rules) are meant to be essentially impersonal and universally applicable, but they are also elastic enough to accommodate different personal situations. They are elaborate and exacting to preclude arbitrary action by staff, but because they permit individual interpretation, arbitrariness abounds. They prescribe precisely what the system can offer its clients, but the overwhelming work needed to meet that prescription makes even that minimum amount difficult to provide (p.39).

1.3 Alternative Perspectives on Individual Behavior

If those charged with implementing program policies through the execution of the various agency rules have a great deal of discretion in performing their work, what determines how they will actually behave? Since the discretionary behavior can lead to the implementation of policy contrary to that intended or to policies developed entirely by the individual that are not in agreement with the organization's objectives, it is important for the organization to know why the dysfunctional (from its perspective) behavior comes about.

There are at least four schools of thought on factors which might influence individual behavior among policy implementors. The focus on individual behavior is generally attributed to the "street-level bureaucrat" perspective advanced by Lipsky. Lipsky explains individual behavior in policy implementation in terms of the scarcity of program

resources and the hostility of the worker's environment. But prior to Lipsky, Blau examined the behavior of workers from a structural-functionalist perspective, attributing behavior to certain structural features of the organization and the group. Goffman examined individual behavior from the social-psychological perspective through the examination of role and the individual's desire to project (and protect) a particular self-image. Finally, Skolnick, a sociologist, viewed behavior as a reaction to elements of the worker's job; elements which caused the member to develop a "working personality". I shall briefly describe each of these perspectives in the remainder of this chapter.

1.3.1 Lipsky's "Street-Level Bureaucrat"

Lipsky (1976, 1980) coined the term "street-level bureaucrat" to refer to individuals in service agencies who interact with clients and who have wide discretion over the benefits or sanctions assigned those clients. Lipsky (1980) points out that "the decisions of the street-level bureaucrats, the routine they establish, and the devices they invent to cope with uncertainties and work pressures, effectively become the public policy they carry out" (p. xii). The reason why street-level bureaucrats have a critical role in daily government is that the policy they deliver is often immediate and focused entirely on the individual client. Lipsky argues that while the street-level bureaucrats are trained to respond to the individual needs or characteristics of the clients they confront, within the rules of the organization, in reality

work requirements prohibit individualized service. Workers instead respond with modes of mass processing and strategies of self-defense and protection.

Consequently, there are aspects of the individual's daily job which make it impossible for the organization to set all the rules for behavior. Lipsky (1980) describes two characteristics of service type jobs which make it difficult to severely reduce or eliminate choice. Those jobs which "involve complex tasks for which elaboration of rules, guidelines, or instructions cannot circumscribe the alternatives" (p.15). First, the worker's situation is too complicated to reduce to a programmatic format. Second, the worker's situation often requires responses to the human dimension, rather than the technical dimension of the problem. "They have discretion because the accepted definitions of their tasks call for sensitive observation and judgement, which are not reduceable to programmed formats" (p.15). Essentially there is the demand for both impartiality and compassion.

Another interesting and useful concept in Lipsky's model is the idea of "coping behavior", i.e., strategies and actions that workers take to contend with the complex environment and to get their work finished (1980, pp. 140-156). Workers are presented with the expectations of the agency, a set of rules to be followed, the scarce resources of time and space, and demands from a continual stream of clients. Each worker views this collection of inputs differently and each develops his own strategy to make it all work.

Both Lipsky and Prottas (1979) identify several of the coping strategies common across street-level bureaucrats. First, workers control the access the client has to them through a screening process. Second, workers arrange their clients in a queue according to some priority or ease of processing. Third, workers establish "paths" for the client through the agency and develop routines for getting the client from one step to the next. Fourth, workers modify their own conception of their job and their work by emphasizing private goals and/or specializing in one part of the job. Fifth, workers attempt to control the "consequences" of the service as well as the service itself. I shall examine these and other coping strategies more fully in later chapters.

1.3.2 Blau's Model of Organizational Change

In a significant work on organizational change, Blau (1962) used the conceptual scheme of functional analysis to examine the behavior of two bureaucratic organizations. Through direct observation of workers in those organizations, Blau empirically established the process of organizational development whereby organizations continually try to correct the dysfunctions arising within the organization. Dysfunctions occur because the members of the organization adapt their behavior to the structure of that organization or group. The adaptive behavior often conflicts with some other desired agency operation or outcome and, therefore, becomes dysfunctional. When the organization becomes aware of the dysfuntional or problematic behavior, it develops new policies to

correct that behavior. Blau's model state's that this new policy will
itself trigger further adaptive behavior by workers and the cycle starts
again. In schematic form the model appears as:

agency policy

problem ←—————— adaptation
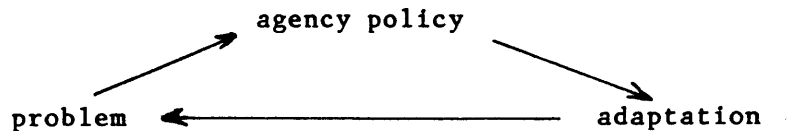
The dynamic nature of the bureaucracy, then, comes from the constant
correction of one set of dysfunctional behavior and the subsequent
creation of another.

Since Blau's major argument is that the structure of the
organization or of the social group influences the adaptive behavior,
this concept must be introduced into the model as well. In schematic
form, the structure appears as the causal influence of adaptive behavior:

policy   structure

problem ←—— adaptation
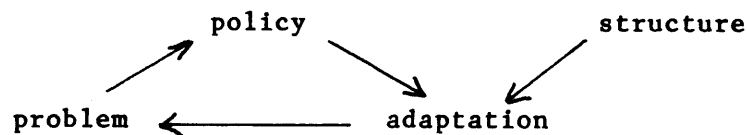
Blau identified several important factors which constitute the structure
of the organization and group. Among the organizational factors were

rules, record keeping systems, performance standards, role definition, and sanctions. Among the group factors were consultation arrangements, networks, social cohesion, unofficial norms, and authority. Thus, "structure" in the above diagram is representative of several other characteristics.

1.3.3 Goffman's "Presentation of the Self".

The individual worker comes to the role with a set of needs, expectations, and resources, and he use his resources within the organization to meet his needs. Among those needs are a set of basic and higher rewards and expectations about his or her ability to perform. Goffman (1971) points out that the individual's need is often to simply sustain a particular self-image.

> It is clear that for the individual, the maintenance of these personnel standards is important not only as a means of carefully coping with routine difficulties, but as a means of sustaining an image of himself to which he is attached (p. 278).

A great deal of effort is expended by the individual to maintain his image in situations of high stress. Police, for example, attempt to maintain the image of bravery during confrontations with dangerous criminals. Thus, the worker will be internally motivated to meet his expectations, physical needs, image, etc. and much of what might be considered idiosyncratic behavior is simply the individual acting on his own needs. However, the extent to which acting on one's own needs is

contrary to the expectations of the organization will result in additional stress being put on the worker.

Goffman (1959) offers the dramaturgic or impression management perspective as a contrast to the perspectives of 1) technical (goal achievement) 2) political (power and rewards), 3) structural (social Divisions), and cultural (values norms and standards of behavior) for analyzing social establishments. Behavior constitutes performances that the actor tailors to specific activities. To succeed in social interaction, the individual must be skilled in the dramaturgical techniques of both executing and maintaining impressions. One needs information in order to socially interact: information comes from experience, setting, etc. but most importantly from the individual himself. Acquiring all of the information about a context of interaction is of great predictive value to the individual. But since full information is not always available, people rely on appearances.

"Proper" role behavior stems from the appearance of discharging the role's requirements, not just the functional requisites. It is expected that the performance of the role will be consistent with the "face" presented. A person who enacts the same routine to the same audience will probably develop a standardized relationship with them. The performance of any given individual interlocks with that of one or more others, and taken together, these project a definition of a situation which is common to the cooperating players; any members can give the show away if they don't maintain the same impression with one another. Thus,

after a person establishes a role in an interaction, he or she, is

motivated to maintain or repair the role.

1.3.4 Skolnick's "Working Personality"

A fourth perspective on the behavior of individual service workers

is provided by Skolnick's study of police. Skolnick (1966) joins the

sociological discussion of the influence that occupations have on a

person's work and his outlook on the world. Skolnick concludes that

certain outstanding elements in the policemen's work environment, i.e.,

danger, authority, and efficiency, combine to

> ...generate distinctive cognitive and behavioral
> responses in police: a "working personality." Such an
> analysis does not suggest that all police are alike in
> "working personality", but that there are distinctive
> cognitive tendencies in police as an occupational group (p.
> 42).

While the particular combination of three elements is unique to police,

the development of a working personality can occur in other professions

that share some of the same elements. Each group then develops ways of

looking at the world distinctive to themselves.

The policemen's working personality develops through exposure to

the job and its environment. The element of danger makes the policeman

attentive to signs of potential harm and tends to make him "suspicious".

Danger also isolates him as a friend and from the general citizenry. The

element of authority reinforces that isolation by directing the action of

the citizenry. Since all police are exposed to these same elements, Skolnick suggests that the working personality is common to all police. On the basis of this concept we would expect uniform behavior among other types of service workers.

1.4 Purpose and Overview of this Study

The purpose of this study is to explore how the "front-line" workers in local welfare agencies go about implementing program rules and regulation and to determine the impact of their behavior on the treatment of clients. Earlier research has shown that "front-line" service workers, i.e., those individuals who directly interact with clients in the implementation of policy and the provision of services, have a large amount of discretion in how they carry out their responsibilities (Goffman, 1961; Kadish and Kadish, 1973). Lipsky (1980) and Prottas (1982) have shown the importance of discretionary behavior among "street-level bureaucrats", and have suggested that these workers develop coping behavior to deal with their environment. This coping behavior then becomes the de facto policy of the agency regardless of the way in which the policy was initially stated. The following study provides empirical evidence on the way in which front-line workers individually implement agency policy through their treatment of clients. Specifically, this study examines the behavior of 15 intake workers in a

large Massachusetts welfare office, and supplements those observations with interviews from workers in other offices across the country.

The following discussion is organized into eight chapters. This chapter discusses the function that rules serve in large organizations and suggests three types of rules that attempt to control behavior. Chapter 2 discusses the problems that arise in trying to control behavior through rules in the Aid to Families with Dependent Children (AFDC) program and the ways that discretion is introduced into workers' jobs. Chapter 3 describes the research methodology that was used to collect and analyze the data for this study. Chapter 4 then examines the behavior of workers in the Massplace welfare office in light of the mandatory rules they are required to follow. Chapter 5 presents a similar examination of worker behavior in light of the permissive rules established by the agency. Chapter 6 continues the examination of worker behavior with the third and final group of rules, i.e., normative rules; the chapter also discusses problems that workers face in role definition and role conflict while performing their job. Chapter 7 summarizes the findings from the data and suggests a model for explaining the behavior that occurs. Finally, Chapter 8 draws general conclusions from the data and discusses the implications of the data for policy makers and for further research.

Chapter 2

POLICY IMPLEMENTATION IN THE WELFARE PROGRAM

This study focuses on one particular type of street-level
bureaucrat, the front- line welfare worker; specifically those workers
who determine whether clients will be admitted to the AFDC program. In
this chapter, I focus on a few of the rules and regulations governing the
behavior of workers who administer the Aid to Families with Dependent
Children program in order to explore the extent to which those rules
control the everyday behavior of the worker.

2.1 The Purpose of the AFDC Program

The general system of federally sponsored, public welfare in effect
today was originally initiated by the omnibus Social Security Act of 1935
[1]. One of the principle components of public welfare established by the
Act was the program for Aid to Families with Dependent Children (AFDC).

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1. Public Law 271, 74th Congress, 49 Statute 620.

Under Title IV (Grants to the States for Aid and Services to Needy Families with Children) federal funds are provided for children deprived of adequate care due to loss of parental support through death, absence, incapacity, or unemployment of one or both parents. The specific provisions creating and defining the program sets forth that the federal government will provide grants to each state

> ...for purpose of encouraging the care of dependent children in their own homes or in the homes of relatives by enabling each state to furnish financial assistance and rehabilitation in such state, as far as practicable under the conditions in such state, to needy dependent children and parents or relatives with whom they are living to help maintain and strengthen family life and to help such parents or relatives to attain or retain capability for the maximum self-support and personal independence consistent with the maintenance of continuing parental care and protection, there is hereby authorized to be appropriated for each fiscal year a sum sufficient to carry out the purpose of this part. The sums made available under this section shall be used for making payments to States which have submitted, and have approved by the Secretary of Health, Education and Welfare state plans for aid and services to needy families with children.

The funds of the AFDC grant are awarded to the designated parent or caretaker relative of the child(ren) and are to be used to provide the child(ren) with an adequate level of food clothing, and shelter. These subsistence payments are made monthly or semi-monthly (depending upon the particular regulations of the state) in the form of a check to an assistance group consisting of the caretaker relative and eligible child(ren).

In order for a family to receive AFDC benefits, each member of that

family must meet a variety of eligibility criteria. First, at least one child must meet the requirement of deprivation described earlier. Second, that child must be living with a specified relative in the relative's home; the relative must be a blood relative, e.g., mother, father, sister, brother, aunt, cousin, or an adoptive relative. Third, the qualifying child must be under 18 years of age, or, if 18 through 20 years of age, must be attending school on a full-time basis. Fourth, all members of the assistance unit who are over 16 years of age and not in school full-time must register for the Work Incentive Program (WIN) and with the State's Division of Employment Security. Fifth, all recipients of AFDC must sign over any rights to child support to the state and must cooperate with the state's efforts to locate and collect reimbursement from the absent parent.

Finally, and perhaps most importantly, the recipient family must have an income below the standard of need established by the state. Each state is responsible for deciding its own maximum ceiling on family income for purposes of financial eligibility and/or establishing the amount of the assistance grant. All income and resources in money, goods, or services are considered in determining a family's need for assistance, and deductions are allowed only for that income which is actually being received. Income in-kind is evaluated separately and deducted accordingly. Depending upon state regulations, certain amounts of earned income are also disregarded in computing total income and certain deductions are made for work related expenses. Financial

eligibility is then computed by comparing the net countable income to the standard grant amount for that size family. The difference between the standard grant amount and the net countable income is the amount of money that the family receives as its AFDC grant each month.

2.2 The Administrative Organization of the Program

While the Title IV clearly established the objectives of the AFDC program, it gave administrative responsibility for the program's operation to the Department of Health, Education and Welfare (HEW) and the individual state governments. Whereas HEW formulates the overall rules and regulations for AFDC, the program is actually administered by the fifty states, i.e., it is a federally financed, state administered assistance program. Operating within the federal framework, state legislators adopt statutes establishing an AFDC program and designating a responsible state agency to distribute payments. Most states choose to have a state agency directly administer the program, while a few states choose to have counties or cities administer the program under state supervision. Under both arrangements, however, the state adopts its own set of rules and regulations which spell out how, in accordance with the Congressional mandate, federal regulations, and state law, AFDC will be administered.

Within the organization of the state, there is usually either a

single public welfare department or an umbrella agency that coordinates and provides all human services for the state. The designated state agency is responsible for ensuring that the AFDC program is administered properly. The central or state level offices of the agency provide programmatic and administrative direction for the welfare system but the direct provision of services/assistance is delegated to a network of local offices. An illustration of the state organization in Massachusetts is shown in Exhibit 2-1.

There is a second level of organization immediately below the central department offices in most states. A network of six to ten regional offices, geographically dispersed around the state, carry out a middle management function. Functioning as an intermediary between the state and local offices, the regional office serves as the primary disseminator of policy changes and the principal monitor for the quality and quantity of the work done in the local offices. The region may also be responsible for the hiring and firing of staff at the local level.

The 50 to 160 local offices that exist in most states constitute a third level of bureaucracy. Local offices are responsible for determining client eligibility for all medical and financial assistance programs. In addition, the local offices provide limited social services and referrals to other agencies, and make periodic redeterminations of eligibility as well as grant adjustments. Most offices are structured into an additional several layers of hierarchy and administrative responsibility. In Massachusetts for example, the local office may have

Exhibit 2-1

ORGANIZATION OF THE MASSACHUSETTS DEPARTMENT OF PUBLIC WELFARE
(1980)
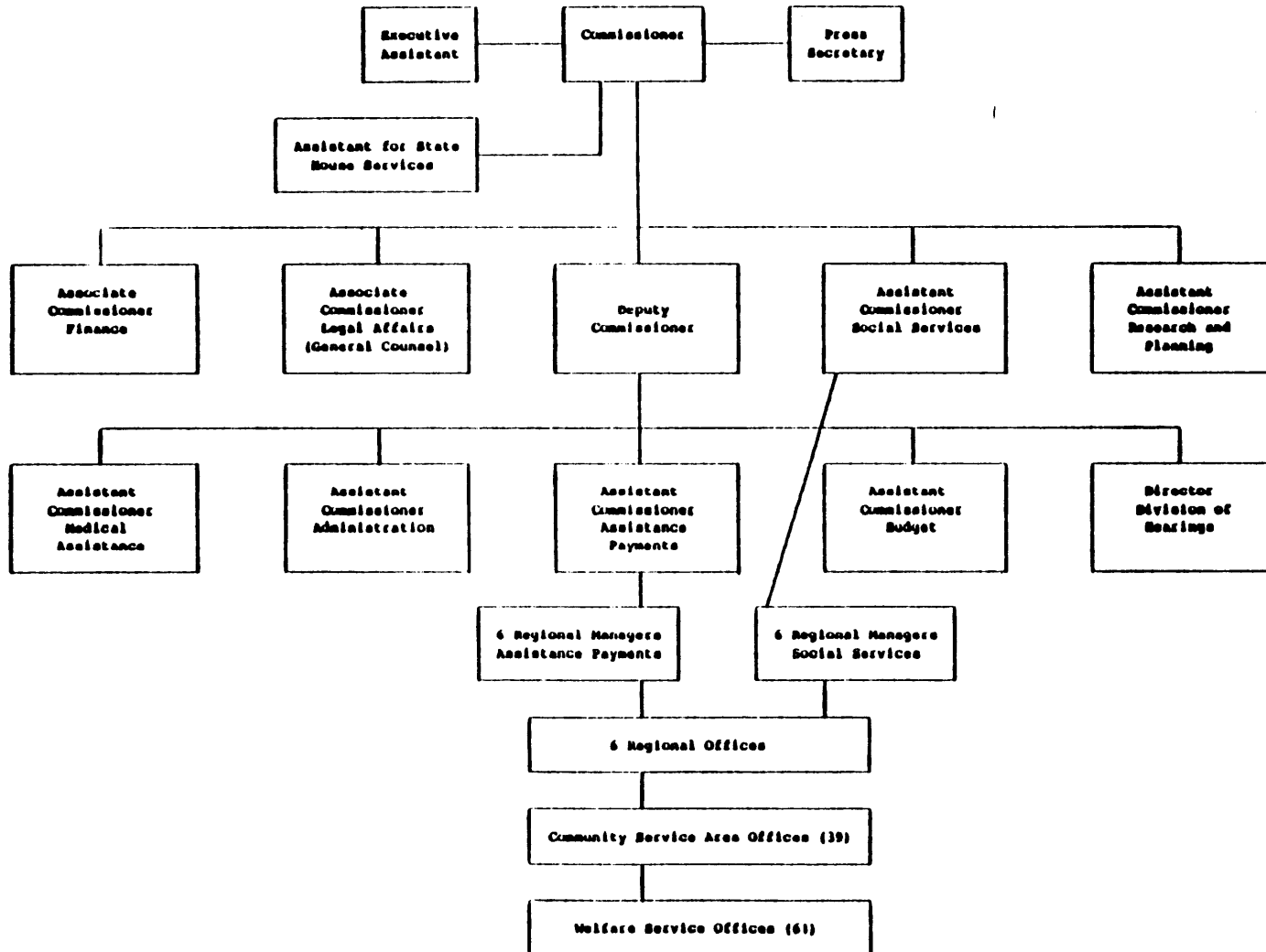
three to five levels of supervision. At the top is the local office

director and his deputy and assistant administrators. Next come several

supervisors and head administrative clerks, each who supervises several

first-line supervisors. Finally, at the bottom of the hierarchy is the

front-line workers and clerical staff. The front-line worker units

provide either social services or financial assistance. Thus, there

could be a total of nine levels of administration between Congress and

the worker who actually implements the program service: Congress, HEW,

Office of Family Assistance, Mass Dept. of Public Welfare central office,

regional office, the local office director, assistant director, head

social work supervisors, the unit supervisor, and finally the worker.

2.3 The Flow of Rules and Regulations

When Congress created the legal framework for AFDC, it left to the

Department of Health, Education, and Welfare (HEW) the elaboration of

rules and regulations for the program's implementation. In establishing

safeguards for the expenditure of funds by the individual states who

actually administer the program, HEW imposed 23 conditions on the states

(Sampson, 1972). Among these conditions are that the state must provide

for personnel employment in a merit system (i.e., civil services system),

use an income/ means test in determining eligibility, provide the

opportunity for appeal hearings, and safeguard all information. The

volume of specific regulations explaining these and other conditions·are

contained in the Code of Federal Regulations, published in the Federal

Register, and amplified in letters from HEW to the states. While the

regulations for AFDC cover several hundred pages in the CFR and are

formidable reading in their own right, a similar set of regulations was

created by the Dept. of Agriculture to govern the Food Stamp Program and

by the HEW.

Because AFDC is a program administered for HEW by the individual

states, each state further expands on the federal rules through state

legislation, the formal interpretation of federal and state policies,

court verdicts, and even local considerations. Each state welfare agency

generates a set of state manuals which describes how each program will

work, the official forms to be filled out, guidelines for making

decisions, steps for processing cases, and the daily work of the welfare

worker. At each step in the delegation of administrative responsibility

the program rules and regulations become more complex and detailed. The

resulting set of written regulations given to the individual worker

could, in most states, fill a four foot bookshelf. The proliferation of

rules and regulations in recent years raises important questions about

the true impact of such rules on the way in which the AFDC program

operates.

2.4 The Structure of the Worker's Job

The responsibility for translating program rules into actions and for bringing the AFDC program to life rests with the financial caseworker (hereafter refered to as simply the "worker"). The financial caseworker has the job of 1) collecting information (both initially and on an ongoing basis) from the client and from third parties familiar with the client's situation; 2) verifying the completeness and accuracy of the information given; and 3) using the information to assess the client's situation and arrive at a decision about the client's eligibility for assistance. Within the general category of financial assistance worker, there are two categories of worker: "intake" and "on-going". The intake worker specializes in determining the initial eligibility of applicants for AFDC or other assistance programs, and processes the case to begin the payment process. The client's case is then reassigned to an on-going worker who periodically redetermines that the client is still eligible for assistance. This study deals almost entirely with the intake worker since the intake worker has the most direct role in alleviating a client's crisis situation. The behavior and motivation of the on-going worker is similar to that of the intake worker, and many of the observations offered here will apply to those workers as well.

2.4.1 The Job Description

The agency has several means by which it defines the role of the worker and the behavior that is expected. The first mechanism is the

formal job description. This is a brief written description of the tasks

to be performed and is used to assign the worker a civil service

ranking. Most job descriptions for welfare workes define the job as

"determining eligibility for financial assistance" and give various

examples of the tasks and functions contained therein. Expressed as a

process, the job is to "determine through interviews, home visits, and

collateral interviews the eligibility of applicants and their need for

financial assistance" (Greene, 1979, p.4). Or expressed as a task, the

worker "analyzes and evaluates data compiled from interviews, field

investigations, and collateral contacts to assess circumstances;

interprets and applies complex policies and regulations to determine

client eligibility (ibid)".

2.4.2 Training

The second mechanism is the initial and on-going training of

workers to better recognize and understand agency rules. Initial

training of new workers is done by the state or regional staff over a

period of weeks or months. In Massachusetts, for example, new workers

start off with about 15 days of training by the regional staff spread out

over a three month period. During that time the new worker is given

instruction in program requirements, use of the state manual, agency

procedures, and a few practice cases. Classroom training is supplemented

by on the job training and a partial caseload of actual cases. At the

end of the six month probationary period, new workers are expected to

function as regular workers with a full caseload. Although some

supervisors were critical of the initial worker training as being just "a

rereading of the manual" rather than working with actual cases, most

workers appeared to be satisfied with the training they had received.

Beyond the initial training, there is virtually no formal training

of workers except that which is provided directly by the unit

supervisor. Supervisors are trained and then are expected to pass along

the information on new rules to units. However, several supervisors

indicated that they feel they do not have the time to do all the

necessary training.

But the initial training for the worker behavior can be weakened by

numerous problems in the agency's own organization. First, it is often

difficult to get workers to go through the training sessions and those

who do volunteer tend to be the same workers all the time. Second, there

is a serious lack of consistency across the training programs and across

offices. Workers reported that their recent Food Stamp training, for

example, gave conflicting interpretations of regulations to different

groups of trainees. Third, the existing training doesn't really give an

understanding of how the agency operates. Commented one supervisor:

Most workers come here right off the street, and their
only training occurs on the job...there should be a lot more
training that tells the worker not only the who, when and how
of entitlement, but that also makes the worker familiar with
the other agencies and services available. Workers know very
little about the system.

Fourth, training is usually held at a location outside the office,

occassionally outside the community, and once or twice each year outside

the state. Supervisors and workers in several offices complained of

having to travel across the state for some types of training. The 14

cents a mile reimbursement by most states made it costly in terms of time

and money for the worker to go.

In all of the offices, workers expressed an interesting mix of

attitudes toward the first and ongoing training. Workers agreed that the

initial training was useful. On continued training, however, there were

two strong sets of feelings. The predominant feeling was that the

training sessions were a "colossal waste of time": material was covered

which workers already knew or the new forms being taught were not

available for examination in class. Furthermore, workers resented being

sent off for several days of training when they were already behind in

their work, and the time away would only put them farther behind. A few

workers, however, felt that the opportunity to go for training was indeed

an incentive for good performance. The value of training was not as much

in improving themselves but more to "get away from this mess for

awhile". However, others appear anxious to learn more about the constant

changes in policy.: "We need lots of training all the time because things

are constantly changing" commented one worker.

The job description, legal code of conduct, and formal training constitute what Jaques (1956) describes as the "programmed component" of the workers job. The programmed component establishes the specific framework within which the worker is to behave. But Jaques also argues that there is a "discretionary component" as well which allows the occupant of the job to carry out the activity as he chooses.

2.4.3 Caseloads and Work Standards

Up to this point I have described the AFDC processes and the structure of the local offices on the assumption that there was but a single category of worker who did either intake or case maintenance. Now I will drop this assumption and introduce the civil service grade structure as it pertains to assistance payment workers. The grade structure is important to the AFDC process both because of the relative wage ratio and because of the work standards or "quotas" set for each grade. This discussion will focus on the personnel system as it is in the Massachusetts offices.

The Massachusetts Civil Service System is organized into 22 grade levels, 6 of which are used in the local welfare office. At the bottom of the six is a grade 3 worker, also called a case aide. Grade 3 workers carry 60% (108 points) or a normal caseload and receive a wage that is 60% percent ($145.53/per week starting salary) of the regular worker. At the next level is a grade 9 or "financial service technician." Grade 9

workers are responsible for a 75% caseload (135 points) and receive 75%
($178.23/week staring salary) wage. The caseload against which these two
grades are measured is the Grade 12 worker who carries a maximum caseload
of 180 points and who has a starting salary of $204.18 per week. Grade
13 and 14 (Financial Assistance Workers II and III respectively) both
carry the same size caseload as the Graded 12 but receive slightly more
pay to reflect worker longevity and skill.

The work standards for each grade of worker are established as part
of the negotiated collective bargaining contract. According to the
contract, grades 3,9,12, 13, and 14 workers can be required to do the
appropriate point-level amount of work --but no more-- during the month.
The contract then goes on to assign point counts for different types of
work and cases. In intake, workers receive points for each application
taken (not just for the interview done): six points for an AFDC
application, three points for a General Relief application, and 1.5
points for a medical assistance application. It is assumed that each
worker will complete within the 22 day time limit all the applications
she has taken. Thus, a regular intake worker (Grade 120 would be
required to take 30 AFDC applications (30 x 6 points = 180) or 60 GR
applications (60 x 3 points = 180), or some combination of the two in
order to meet his or her quota for the month. Since workers reported
that their caseload of applications is about evenly mixed AFDC and GR
cases, this would imply that an intake worker would have approximately 20
AFDC and 20 GR applications per month.

Many workers feel that the quota system is very unfair since it does not take into account or give credit for the other types of work being done. This was especially true among case maintenance workers who were called upon to do a variety of things for clients outside of regular case processing, e.g. helping a client who was just burned out her home. Further, the system has a built in incentive for absenteeism: workers are given a "backoff" in their quota of points if they are absent five or more days in the month. Thus, if a worker is sick for only three days, the incentive is to stay out the extra two days and benefit from the "backoff policy".

What sanctions does the worker face if he does not meet the quota for the month? Because the department places such an emphasis on production (or "numbers" as the worker say), there is naturally a great deal of attention paid to worker and office quotas. Throughout the month, the unit supervisor monitors each worker to guage the worker's progress toward their quota and to offer guidance in completing cases. If the worker still does not meet the quota, the supervisor discusses the problem with the worker and puts a letter in the worker's record. If the worker misses his or her quota a second time, the worker is sent a warning letter by the head social work supervisor. At the third occurance, the worker is given special training and placed under close supervision. The fourth occurence prompts the assistant director to initiate the laying-off of the worker. However, it is very rare that a worker will go through all four sanctions; the constant checking of the

supervisor is usually enough to keep workers on target.

2.5 Exercising Discretion in Welfare Work

That a welfare worker's job possess considerable discretion has

been documented by several studies. Hanson (n.d.) and Teknekron (1979)

both found that the absence of clearly specified rules, instructions, and

performance standards imparted substantial discretionary authority to the

welfare worker. Lipsky (1980) and Horejsi, Walz and Connolly (1977)

discovered that workers will assume large measures of discretion in their

job in order to resolve the conflict of program goals and regulations.

Scott (1961) found that the welfare workers sometimes reinterpret agency

rules as client situations vary. Finally, Reid (1972) discovered that

workers were far from uniform in applying agency rules when refering

clients to the Work Incentive Program.

Since workers deal with a large number of decisions in the

processing of each case, it is possible for the worker to exercise

discretion at each step of the process. By virtue of their position in

the agency and their expertise the worker can heavily influence -- if not

completely control -- client treatment, the amount and accuracy of work

completed, support of agency policies, and the agency's successful

performance. Studies of local welfare offices in Georgia, Washington,

Illinois, and Massachusetts (Bateman, et. al. 1980 a,b,c,d) identified

five general and thirty-three specific actions or decisions over which workers feel they have considerable discretion. The list, compiled from reported or observed behavior among approximately 200 workers is presented in Exhibit 2-2.

The lack of clear rules and sanctions by the local agency allows the worker to be more responsive to and sensitive to other factors when processing clients. These other factors may come from the client, the office setting, the environment, or from the worker himself. Different workers in the same situation are influenced by different sets of factors because of the attitudes and experiences which they bring to the job. These secondary factors may motivate the worker to behave in a manner different from that predicted or desired by the agency. Agencies perceive worker behavior which is not in accordance with agency program objectives as undesirable and to be discouraged. For example, under the agency's objectives, the worker is to approve only those clients who are truely eligible for assistance, and the worker is to authorize a grant amount that is in accordance with agency standards. The worker could, however, make an "error" (either intentionally or unintentionally) in the client's favor by approving an ineligible person or by giving and eligible client a grant amount that was too large. The worker could also make an error against the client and in the agency's favor by denying an eligible client or by underpaying an eligible client. Or the worker could make an error in his own favor by reaching the proper decision for the client but taking shortcuts in the paperwork and validation so as to

Exhibit 2-2

ACTIONS AND DECISIONS SUBJECT TO WORKER DISCRETION

1. The amount of work that is done:

   a. The number of interviews, redeterminations, etc., completed
   b. Frequency and timing of absences, coffee breaks, etc.
   c. Number of referrals made for information or services
   d. Help given to other workers in.the unit

2. The amount of time devoted to various work tasks:

   a. Talking with clients in interviews or via telephone
   b. Reviewing case documents
   c. Processing forms
   d. Pursuing leads and follow up on problems
   e. Completing miscellaneous reports
   f. Attending to personal business

3. The amount of help or information used in a case:

   a. Asking questions of unit supervisor or agency director
   b. Asking questions of co-workers
   c. Asking clients follow-up questions
   d. Checking manuals
   e. Relying on past experience or intuition

4. The demand they place on the client, client treatment:

   a. Extent of documentation required for verification
   b. Frequency of reporting changes
   c. Frequency and duration of face to face interviews
   d. Availability or access for client initiated contact
   e. Scheduling home visits
   f. Making referrals to other benefits or assistance
   g. Returning client telephone calls
   h. Duration of client waiting times
   i. Initiating client contact
   j. Effort at understanding the client's situation
   k. Timing of grant changes or termination

5. The support of Agency policy:

   a. The order in which forms or work is processed
   b. Completing mandatory or voluntary referrals

c. Computing expenses, income, or grant amount properly
d. Using non-standard forms, notations, routing
e. Modifying deadline requirements or other standards
f. Timing paper processing or case actions
g. Adherence to informal rules, standards and office conduct
h. Reporting known or observed errors

save himself time and energy. Elaborate quality control mechanisms have been established to determine the extent to which these kinds of errors occur but little has been done to sanction the worker directly.

2.5.1 Parallel Assistance Programs

AFDC is only one of several welfare programs provided to low income families through the local office and front-line worker. Two other assistance programs are also provided federally and administered parallel to AFDC. The first program is targeted to food support, while the second is targeted to medical assistance. There is a third program as well in most states which is sponsored exclusively by the state government for individuals not qualified for these other programs. The existence of two or three additional programs for the worker to administer generates a further complexity to the job.

The Food Stamps (FS) program provides coupons earmarked for the purchase of food to low income individuals and families. The full cost of the food coupon benefits and 50% of the state' administrative costs for the program are paid by the federal government. Eligibility for FS is determined on the basis of income, assets, and work registration, with deductions made for work-related, medical, and certain living expenses. Workers in the local offices determine eligibility and calculate benefit levels, which are provided in the form of an Authorization to Participate (ATP) card. The ATP is used to obtain the amount of Food Stamps authorized at coupon issuing locations at no cost to the recipient. The

amount of Food Stamps authorized varies with net income levels and the size of the household. Program regulations provide for both "expedited services" (an accelerated eligibility determination process which can be completed in 48 hours) and for immediate authorizations if the applicant has emergency needs.

Medical Assistance (MA), also called "Medicaid", pays the medical bills of cash assistance recipients (e.g. AFDC families, Supplemental Security Income recipients) and the medically needy, i.e., individuals whose incomes are too high to qualify for cash assistance but whose medical expenses reduce their effective incomes to below the poverty level. Program benefits to all except General Relief recipients include inpatient and outpatient hospital care, nursing home care, physician and dental services, drugs, mental health services, and other ambulatory services. The most costly group of Medicaid recipients are the elderly, accounting for half the program expenditures, even though the comprise only a fifth of the recipients.

The General Assistance (or General Relief) program is designed to provide financial assistance to persons who are ineligible for federal assistance but whose income is insufficient to meet basic needs as defined by the state welfare agency. Under GA, financial assistance is available to help eligible individuals and families, meet basic living expenses, including the cost of necessary medical care, and funeral and burial expenses. An adult GA case contains one GA recipient, and a family GA case consists of one or more children who live with a relative

but do not meet all the non-financial requirements of AFDC. The relative and the relative's spouse may not be included in the GA family case. GA, the only public assistance program financed entirely by state and local funds, also provides recipients with social service allowances to assist clients in securing employment.

2.5.2 Proliferation of Regulations

Workers in the Massplace office indicated that another major condition contributing to error is the sheer number of rules and regulations that have to be taken into account during the eligibility process. Different regulations and standards apply to different types of income or assets. Workers find it hard to remember all of the provisions and exceptions and do not always have the time (or inclination) to look up policy in the state's policy manual for AFDC. Furthermore, the regulations and standards are not uniform across time. The state is constantly creating new regulations and adjusting old standards as program policy is updated and refined. It appears that there may be an "overload" of rules in the local office and therefore all rules become less important to enforce. The state's attempt to be explicit as to program administration generates a constant stream of policy memos and revisions to the worker. The worker, already pressed for time to get everything done, tends to cope with the stream by simply inserting the memo(s) in the manual and forgetting about it until a specific client problem occurs.

A frequent and widespread complaint among workers regarding the manual was the timing and delivery of changes. The state manual is updated regularly through a series of "state letters" which indicate changes in the assistance program's policies and procedures. These letters are delivered to each worker and require the worker to take the time to read the letter, make the appropriate changes in the manual, ask questions of the supervisor, and spend a few moments thinking about the policy on each case until it becomes routine. The timing of the letters has been a topic of controversy between state and local offices. In Massachusetts, for example, the state's initial policy was to distribute the letters as they were prepared in order to get the changes implemented as quickly as possible. Workers complained, however, that this schedule meant continual interruptions to them each week, and they requested that state letters be collected and sent to them all at one time each month. The state office agreed and made the schedule adjustment, but more recently has gone back to distributions throughout the month. During August and September 1979, local offices in Massachusettes received a total of 26 state letters changing regulations and over 75% of them arrived during the last week of each month. It should be noted that these letters also arrive about the same time as most workers are trying to finish their quota of eligibility redeterminations for the month.

Two additional complaints among workers are that state letters either arrive long after their date of implementation (automatically putting the worker in error) or they arrive on the day of implementation

and give the worker no warning of the change (thereby making another "surprise" in the worker's day). A review of the 26 state letters received in August and September, for example, showed that: 4 letters were effective three days to two months retroactively; 9 letters were effective immediately, 8 letters gave 4 to 40 days advance notice,, and 5 letters were for information purposes only.

2.5.3 Rule Ambiguity

Workers are confronted by both rules which contain ambiguous mandates and rules which specifically give them the authority to decide. The situation is an uncomfortable one for workers. As one worker put it, "How do I interpret the word 'may'? Does it mean 'will' or 'can'? How you interpret that one word can change an eligibility decision." For example, one state's manual says that if the client owns property, the property may be exempted as a resource as long as it is about the same size parcel as everyone else's in the area. No absolute size is specified.

Rule ambiguity also occurs because of weaknesses in agency administration. Administrators in the Massplace office complained that they were given very little explanation or guidance of new program regulations they were asked to implement. Quite often, the office received a notice of policy change but no instructions about implementation. As one administrator said, "The state letters almost assume that the local office will not have any questions on the policy or

its implementation and will simply go ahead and do it. But, in fact, there can be serious problems in carrying out the implementation, and there is nowhere to turn for guidance." A frequently cited example among the workers is the receipt of instructions for using a new form but no copies of the new forms themselves. Staff complained that the forms may arrive in the office up to two months after the office becomes responsible for making the change.

What, then, can workers do when confronted with rule ambiguity? When workers encounter questionable interpretations they can either go back and reread the manuals, ask a fellow worker for her interpretation, or ask a unit supervisor for clarification. While the logical (and from the agency's perspective, desirable) recourse is to ask the unit supervisor for clarification, workers complained that the policy interpretation can vary drastically from supervisor to supervisor. In the words of one worker:

> Nothing is uniform! Each supervisor and alternate supervisor have different ways of interpreting policies and procedures or have set ways of performing a particular task. For example, some supervisors want a new Food Stamp application completed at each redetermination; others only want an updated form. Or they have some personal preference about how memos are to be worded. Why can't they give us a clear set of regulations which say what you do and don't do?

Consequently, workers often seek answers or interpretations from their fellow workers rather than risk being bound by a disagreeable interpretation from the unit supervisor. Even more frequently, workers simply decide on their own what a policy means and what is the

appropriate action to be taken.

Rule enforcement is also quite dubious when the worker encounters the "unworkable rule." Such rules exist in formal agency regulations but are perceived by workers as being unworkable, illogical, and/or, contradictory to rational bureaucratic behavior or even the manifest purpose of the agency. Workers speak openly of these rules and usually argue with their supervisors, office director, or anyone else for the elimination of such rules. For example, workers consider any attempt to get police verification of stolen checks to be an exercise in futility and so they feed fictitious data into the computer to satisfy agency requirements. Or workers feel it is ridiculous to constrain the amount of bus fare given the client when slightly more fare would get them to a job that would make the client self-sufficient.

In these last two chapters I have looked at rules from the perspective of the organization and its policy makers. Chapter 1 introduced the function of rules in an organization: to control and coordinate the behavior of the organization's members towards the accomplishment of some set of goals and objectives. Each rule establishes a boundary for the member; on one side of the boundary is acceptable/desirable behavior in the eyes of the organization while on the other side is unacceptrable or deviant behavior. Taken together the rules map out the total area of acceptable behavior much the way streets can delineate the boundaries of a city block. But Chapter 1 also noted that it is impossible for an organization to generate rules governing

every action of its members, and that even those rules which are established are weakened in many ways. The result is that a certain amount of discretion is either intentionally or unintentionally delegated to the member.

This chapter introduced the local welfare office as an organization with goals and objectives and the AFDC program as the source of rules controling the behavior of its organizational members, i.e., workers and clients. But factors such as political controversy, administrative hierarchy, program complexity, and "bureaucratic" writing have imparted a great deal of discretion to workers in carrying out their job. In spite of the objectives of uniform and equitable treatment of AFDC clients, the evidence from several welfare offices shows that there is often substantial variation in the way clients are treated and the outcomes produced by the agency. From the perspective of the policy maker, the occurrence of client outcomes other than those originally intended represents a breakdown in the policy implementation process. The task at hand, then, will be to identify why those variations occur and propose actions that will result in the desired implemention.

Chapter 3

RESEARCH METHODOLOGY

This paper is essentially a case study of the intake workers in a single large welfare office. The analysis presented shows the variations in individual worker behavior and is based on data from a two major sources. The first source was a major work measurement study of the Massplace Welfare Office. The second source was a management survey of fifteen local welfare offices across the country. Both data sets were originally assembled as part of an important study by Abt Associates, Inc. for the Dept. of Health and Human Services. [2] The Abt study focused on the welfare office as the unit of analysis and aggregated all data on individual workers to the section or office level. The current study, in contrast, focuses on the individual worker as the unit of analysis and represents a secondary analysis of the Abt study data. Each data set has its own methodology for the collection and analysis of data as described below. The following discussion in each part first describes the circumstances for collecting the data, then the data

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2. The purpose of the Abt study was to construct a computer simulation model of a local welfare office to be used by DHHS in policy development.

collection procedures, and finally the steps in data analysis.

3.1 Observed Worker Behavior

The data on individual worker behavior was collected in the Massplace

Office by Abt staff between April 26th and May 30th of 1980. The entire

planning and supervision of this data collection was done by the author,

and the author was directly involved in data collection on a daily

basis. The data collection team consisted of three professional staff

and twelve part-time, trained observers. In addition to the two work

measurement techniques described here, the Abt study involved a

random-moment survey of worker activities, direct observation of

worker-client interaction, a survey of clients, and a review of

approximately 1200 AFDC case records.

3.1.1 Office Selection

The Massplace Office was selected by the Abt project staff as the

data collection site for three reasons. First and foremost, the

Massplace Office was considered to be representative of other large

caseload offices which the staff had examined in other states (see the

management survey discussed below). Earlier studies of state and local

welfare systems had shown that program administration varies

significantly from office to office (Congressional Research Service, 1977; Newman, et. al. 1977). While the Abt management survey confirmed that substantial variations do exist among offices, it also showed that there were fundamental similarities among offices as well and that part of the previously identified variations were due to differences in labeling, terminology, or form processing. A cross-state synthesis by Budding (1980) showed that in spite of apparent differences all offices have to interact with the client, have to determine client eligibility, have to determine the level of benefit, and have to establish the timing for the payment to the client. Thus, it is possible to talk about a representative welfare office and to generalize from such and office to other offices.

A second reason for selecting the Massplace office was the size of the AFDC caseload and the presence of other federal assistance payment programs. The Massplace office is among the largest in the state with an active AFDC caseload in 1979 of 7,924 cases -- almost 7% of the state's total AFDC cases. Because such a large portion of the cases are administered by a few large offices in any state, any valid analytical model must be based on these larger offices. As with most other welfare offices, Massplace also administered the General Relief program for the state and the Food Stamp program for the Dept. of Agriculture. The office's 1,726 General Relief cases in 1979 accounted for almost 9% of the state's total GR cases, while the offices 7,599 public assistance Food Stamp cases accounted for 7% of the state caseload. It is

interesting to note that the office is significant not only in the number of cases but also in the total dollar amount of its payments. Each month the office pays out in excess of $2.6 million in direct payments for AFDC. One administrator estimated that if the value of Medicaid, Food Stamps, and other assistence were also considered, the total "cash flow" for the office was over $8 million per month.

The third reason for selecting the Massplace office was its proximity to the Abt corporate offices in Cambridge. The number of research staff involved, the intensive level of measurement, and the transportation costs of staff and supplies necessitated the selection of a welfare office that was easily accessible. After these three selection criteria were applied to the Massachusetts welfare offices and the Massplace office selected, a formal request for the office's participation was made to the Commissioner of Public Welfare and to the Director of the Massplace office. Both parties agreed to participate in the work measurement study.

3.1.2 Time Lapse Measurements

One portion of the work measurement study focused on the length of time that certain case processing activities took. The study needed to determine the length of time that clients had to wait before seeing a welfare worker and the duration of various types of interviews. This data was collected by making slight modifications to the normal process for notifying workers that clients were waiting to see them. When a

client enters the Massplace office, he or she immediately checks in with the receptionist and asks to see a worker. Prior to the Abt study, the receptionist would fill out a "reception slip" indicating the client's name and social security number, the date, and the worker's name. Either the receptionist or a clerk would then distribute the reception slip to the appropriate worker as four or five slips would accumulate. The slips were placed in a pouch near the worker's desk, and the worker would periodically check the pouch to see if any clients were waiting.

In planning for the study, I modified the office's reception slip system in three ways. First, I replaced the original single reception slip with two slips. An "interview slip" was to be used if the client was coming to the office for the first time to apply for AFDC. A "reception slip" was to be used if the client was coming in for a follow-up interview (or for any other reason) with the worker. The interview slip contained space for all the data usually collected by the receptionist, but it also had space for the worker to indicate whether the client failed to show up for the interview ("no-showed") or whether the worker declined to take an application from the client ("no-app"). The data entered on the the new reception slip was identical to the information on the original slip.

Second, each of the new "interview" and "reception" slips had a unique identifying number pre-stamped on it. Each slip also had a self-carboned second sheet attached to it to record all of the data enetered on the top slip. When the receptionist finished filling out the

appropriate slip on the client, the receptionist separated the second

copy and set it aside for collection by the Abt staff. The original or

top copy was distributed in the normal manner described above. As the

originals were later collected from the workers, each slip was matched

with its yellow copy by the unique identifying number on the slip.

Third, I installed a Simplex time stamp machine on the counter next

to the receptionist and another Simplex machine on a stand by the door

leading to the interview cubicles. After the receptionist completed the

slip and separated the copy, she inserted the top copy into the machine

to be time stamped. The first (or earliest) time stamp was defined as

the starting time for the client's wait. While it is possible that the

client may also have had to wait to see the receptionist, my direct

observation of the waiting lines showed that clients waited no longer

than 2 to 4 minutes.

To the existing reception slip system I also added a new step.

Instead of workers discarding the "reception slip" when they went to see

the client, as they had done previously, workers were asked to stamp

additional times on the slip. As the worker passed through the doorway

from the office into the waiting room, he or she inserted the slip into

the Simplex machine stationed by the door. This second time stamp was

defined as the end of the client waiting period and the start of the

worker's interview with the client. The interview then took place in one

of the cubicles in the interview area. After the interview, the worker

returns to the office through the doorway and again inserts the slip into

the Simplex machine. This third stamp was defined as the end of the worker client interview.

When the worker has finished with the slip, he or she dropped the slip into a box next to the Simplex machine. Every 30 minutes a member of the Abt research staff collected all of the slips and matched the original with its yellow copy. If the worker had indicated on the "interview slip" that no application was taken or the client was not there when called, the Abt staffer would first report the information to the receptionist so that the worker would be assigned another interview. At the end of the day those second copies which were not matched to an original (i.e., the worker had not dropped the the original in the box) were set aside to be tracked the following day. The next day an Abt staffer would ask the worker for the slip on the missing interview. The worker was usually able to find the slip in the paperwork on his or her desk, in the case file, or in some other place in the office.

During the work measurement period a total of about 300 interview slips and 650 reception slips were used for intake cases. Of these all but about 9% were successfully matched. Of the 9% unmatched slips, about 90% were slips belonging to one intake worker who refused to participate in the study. The non-participating worker was the union shop steward who felt that the data from the study would be used by the Dept. of Public Welfare to raise work standards or otherwise harass workers. Thus, time lapse data for this portion of the study is available for only 14 of the 15 intake workers. The balance of the unmatched slips were

assumed to be either lost or accidentally destroyed.

After the six week measurement period had ended, all of the data from the interview slips and reception slips was key-entered into an SAS data set for analysis. The data from the interview slips constituted one data set while the data from the reception slips constituted a second data set. For each data set, SAS processing was used to calculate the client waiting time, the lapse time of the interview, the number of times clients "no-showed", and the number of "no-apps" interviews. Each data set was then sorted by worker name, and the time lapse averages were computed for each intake worker. The results of the analysis for the individual intake workers are reported in Chapters 4 and 5.

3.1.3 Date-Lapse Measurement and Disposition

A second portion of the work measurement study looked at case processing times that took longer than a few hours to complete and at the final outcome of the case. This data was collected from an "application log" book regularly maintained by the office. As part of the initial processing of an AFDC application, the intake worker will record in the application log the client's name, client's social security number, the data of the application, and the worker's case assignment number. The date entered as the application date is actually the date on which the interview took place and , for purposes of this study, was defined as the start of case processing.

When the intake worker completes the processing of the case and

reaches a final decision on the application, a clerk will enter additional information in the application log book. On the same line started by the worker, the clerk enters the date of the disposition and whether the case was approved, denied, or withdrawn by the client. If the application was denied, the clerk also enters a two digit code indicating the reason for denial.

In early July 1980, after all the applications started during the six week measurement period had been disposed of, the data from the application log book was key-entered into another SAS data set. SAS processing was used to calculate the total processing time for each application. The data set was then sorted by worker case assignment number (a unique identifying number for each worker assigned by the office) to generate an approval/denial rate, an average processing time by type of decision, and a frequency count of application withdrawls for each intake worker. The resulting data is also presented in Chapters 4 and 5 that follow.

3.2 Worker Reporting of Behavior and Motivation

The analysis in this study is based on data from a major management survey of fifteen local welfare offices, including the Massplace Office, across five states. A portion of the data was also collected through open-ended interviews with workers during the work measurement study

described in the preceding chapter. I had the opportunity to conduct first hand observations of intake workers processing case paperwork, interviewing clients, and conducting home visits. As I observed these activities I asked workers why they were doing things in their particular way or why they had made a particular decision. These observations were later recorded as notes and are used through the discussion in this chapter. I also debriefed the three other Abt professional staff regarding their observations of worker behavior and self-reports from workers. These secondary observations were later recorded as notes and also used in the following discussion.

The majority of data for this chapter, however, was collected by Abt staff during a management survey of fifteen local offices conducted between February and October 1979. The planning and supervision of the data collection effort in 9 of the 15 offices was done by the author, and the author was directly involved in the data collection in each of those 9 offices. The data collection team consisted of six professional staff trained in interviewing and document collection. The purpose of the management survey was to document, in detail, the steps followed in processing and maintaining AFDC cases.

The state offices, local offices, and individual respondents who were interviewed for the survey were selected on a "volunteer" basis. The Office of the Assistant Secretary for Planning and Evaluation in HEW contacted state officials in several states asking for their cooperation as a study site. The first five states to agree to participate were

Georgia, Illinois, Massachusetts, Oklahoma, and Washington. Within each of the five states, state welfare officials (usually the director of assistance payments) selected three local offices as study sites. Abt requested that the offices represent different size offices in the state, i.e., that state officials choose one small, one medium, and one large size office on the basis of office caseload. The list of the fifteen local offices is presented in Exhibit 3-1.

Within each local office, the office director selected the workers and unit supervisors that would be interviewed. While some directors asked for volunteers, others simply chose the individuals they felt were the most suitable. Thus, the data is not collected from a random sample of offices or respondents, and will reflect the biases of those who volunteered or were responsible for selecting the respondents. However, the fact that the interviews were conducted across fifteen local offices and more than 150 workers greatly improves the reliability and representativeness of the data.

Each worker was interviewed by an Abt staff member in a private area, usually away from the worker's desk. Prior to the start of the field interviews, an interview guide was developed as an aide to the interviewer. The interview guide was intended to help explore the nature and content of the worker's job by providing the interviewer with a set of open ended questions to be asked. The interview guide is presented in Appendix A. The interviewer was free to ask the questions in whatever manner and whatever order that seemed most appropriate at that time, as

Exhibit 3-1

LOCAL WELFARE OFFICES VISITED DURING MANAGEMENT SURVEY

State/Local Office	Date Visited
Massachusetts	
Hancock Street*	Sept. - Oct.
Worcester*	1979
Springfield*	
State offices*	
Washington	
Shelton*	June 1979
Olympia*	
Tacoma Avenue*	
State offices*	
Illinois	
Franklin County	April 1979
St. Clair County	
Southeast District*	
State offices*	
Georgia	
Wayne County*	Feb.-March
Floyd County	1979
Fulton County*	
State offices*	
Oklahoma	
Tulsa County	June 1979
Muskogee County	
Wagoner County	
State offices	

* Designates offices in which the author trained and supervised
  interviewers and conducted worker interviews.

long as all points of the guide were covered. The full interview lasted
from 60 to 90 minutes depending upon the complexity of the worker's job
and the extent of their experience. The interviewer took notes during
the interview and subsequently organized and supplemented the notes
according to the interview guide.

The data from the intake worker interviews has been aggregated in
two steps. First, the responses for all workers in the local office were
aggregated at the office level by type of worker, i.e., all responses
from intake workers were combined to describe and explain the activities
of the intake section. Second, the office level analyses were aggregated
across the three offices in each state by type of worker. The results of
both levels of analysis were reported in Bateman (1980 a,b,c,d, and Avis
1980). The discussion in this chapter is based on a reanalysis of the
interview notes and the direct observations from the management survey.
In this reanalysis, the data from the Massplace office has been separated
from the other offices and organized by type of worker and rule. The
data from the other fourteen offices was then organized in the same
fashion and used as supplementary observations for the Massplace data.

Chapter 4

WORKER BEHAVIOR UNDER MANDATORY RULES

In Chapter 1, I cited the distinction among "mandatory," "permissive," and "normative" rules in organizations. Mandatory rules were defined as those rules which impose on the individual an obligation for some action (or refrain from action) and reinforces that obligation with the threat of sanctions if the rule is broken. In Chapter 2, I then discussed the proliferation of rules that has accompanied the AFDC program and noted that a substantial number of these rules are "mandatory" in nature. For example, if the client meets all the requirements for eligibility, the case worker must approve the client for assistance. If the client has not produced all the necessary documentation to prove eligibility, then the caseworker must deny the client assistance. In theory, then, the job of the caseworker should be made easier because the mandatory rules establish clear guidelines for what actions must and must not be taken.

In the reality of the local welfare office, however, the certainty of the rule's mandate appears to often conflict with the uncertainty of the work environment and the expectations for fair treatment. Local

conditions can call into question the policy maker's requirements and intent at the same time that sanctions for rule violation are mitigated. In this chapter I shall examine the observed behavior of workers functioning under "mandatory" rules in order to identify those contextual factors which facilitate or undermine the implementation of the formal rule. One might expect that, given the same mandatory rule for all workers, all workers would behave in the same manner in implementing that rule. While each worker may accomplish the objective within the constraints allowed by the rule, the manner in which they go about their tasks has definite consequences for client treatment and efficiency.

The following discussion presents four rules which generally govern the activities of the worker and which are critical in the determination of client eligibility. The first requirement discussed is that workers must see clients on the same day that the client first enters the office to request aid. The second requirement is that workers must verify all the relevant information regarding the client's eligibility. The third requirement is that workers must reach a final decision on the client's eligibility, while the fourth requirement is that the decision must be made within 22 days. These four rules are by no means exhaustive of the rules governing the eligibility process but are representative of the demands placed on the worker. For each of the following rules, I shall describe the observed behavior of the intake workers in the Massplace office and discuss factors which workers have cited as influencing their execution of the rule.

4.1 Rule 1: Workers must see clients on the day clients

first enter the office.

All AFDC applicants must be seen by a worker on the day in which they come into the office to apply for assistance. In the Massplace office, clients enter the waiting room and check in with the receptionist. The receptionist assigns the client to one of the fifteen intake workers on a totally random basis, i.e., there is no use of the client's characteristics in the assignment process. Each worker is assigned an average of three AFDC clients to see each day (plus three or more General Relief applicants). Exhibit 4-1 shows the average time that each worker made his client wait for the interview. Note that Grant made clients wait only 36 minutes on average versus Charles who had them wait almost 72 minutes on average.

Thus, from a client's point of view, a random assignment to Charles would mean waiting twice as long for an interview as if assigned to Grant. This delay is significant if the end of the day is approaching because it increases the likelihood that the client might not be seen and the rule violated. Unfortunately, it was not possible to determine whether Grant was somehow less accurate or thorough in quickly processing cases, a fact which might make the shorter waiting time less desireable. For purposes of this discussion I will assume that both workers are

Exhibit 4-1

CLIENT WAITING TIME FOR INITIAL INTERVIEW
April 24 through May 27, 1980

Worker	No. of AFDC Application Interviews	Av. Waiting Time (minutes)
Grant	32	36.4
Gibbons	31	40.9
Smith	31	42.0
Hunter	29	45.1
Chase	30	50.4
Rogers	32	54.5
Chambers	27	54.7
Hollins	30	55.2
Little	22	56.5
Crocker	21	59.0
Stafford	33	60.0
Clemson	20	61.3
Charles	31	71.7
Pope	8	103.4
Shepard	23	n/a

equally accurate in their work.

One explanation for the difference in wiating times is that Charles is simply a slower worker than Grant or the other workers. While it was not possible to objectively compare workers on competence, workers did report that there were events in the office which often delayed their ability to see clients right away. In some instances workers became backlogged in their interviews because they couldn't find space in which to interview the client. In other instances, the amount of workload necessitated spending more time working on case records than seeing clients. These factors do not appear to cause significant time delays by themselves, but the frequency with which they occur does appear to have a cumulative effect on client processing.

4.1.1 The Problem of Interviewing Space

Since the interview is the primary vehicle through which the worker collects information, the type and quantity of space in a welfare office reserved for interviewing has important implications for both parties. For the client who wishes to conduct his business in private, the seclusion of the interviewing area may be of concern. For the worker who wishes to conduct the interview at a particular time, the availability of space to do so may become an issue. Even the atmosphere and noise level in the interviewing area might affect the substance and length of the interview. In the Massplace office, all interviews are conducted in one area at the back of the ground floor. This area is connected to the

client waiting room and street entrance by a single door.

Passing through the door from the intake area to the interview area, one immediately perceives a rise in both the noise level and the temperature. The six-foot partitions that carve out the 23 interview cubicles provide visual privacy of sorts but mute the sound of several simultaneous interviews only slightly. Added to the hum of voices interviewing and being interviewed is the noise of a constant parade of workers, clients, and families along the narrow hallways separating the cubicles. At any time, an in-progress interview in a cubicle may be punctuated by other workers looking for an empty space for their own interview, or requesting spare forms, answers, or help. Eight of the cubicles are assigned to 15 intake workers, two to a cubicle. One worker uses the cubicle in the morning the other in the afternoon. A harried ongoing worker may usurp a cubicle set aside for an intake worker and be thrown out in the middle of the interview as a result. The hum of worker and client voices pervading the interviewing area belies any notion of privacy for the client. Standing in the hallway of the room, or in a cubicle, a conversation in any of the surrounding cubicles is clearly audible and distracting to both worker and client.

4.1.2 The Ebb and Flow of Work

Workers in most offices identified two major types of secondary activities which occur during (or parallel to) the basic workflow process and which exert an influence on their work: fluctuations in workload over

time and outside interruptions. While both types of activities do not necessarily affect the sequence of events in the processing of a case, they both affect the total time available to complete each step, the time between the steps, and the total time for processing work. It appears that the two types of activities can further fluctuate along two important dimensions: frequency and duration. Increases in the workload, for example, occur regularly at the beginning and end of the month (when clients are most concerned about their own situation) or happen sporadically and suddenly (such as when there is a factory strike locally). Similarly, interruptions in the form of unit meetings occur regularly each week while interruptions from clients burned out of their home and needing immediate assistance can happen anytime. Both the workload fluctuations and interruptions can last from a few minutes, as in the case of a client telephone call, to several weeks, as in the case of a special project to collect information for updating case record.

The worker's daily routine can also be affected by activities which change from week to week or that happen at only certain times during the month. One such change is the number of applicants entering the office during the month. Just as the early part of the week is a peak time for applications, the first and last weeks of the month appear to be peak times in the Massplace office. Exhibit 4-2 shows the fluctuations in the average number of interviews by week of the month. Intake workers reported that during the "slower" times of the month, they find they spend more time on paperwork and "catching up" from the peak periods. It

Exhibit 4-2

FLUCTUATIONS IN APPLICATIONS BY WEEK OF THE MONTH
Massplace Office

Average Number of Applications
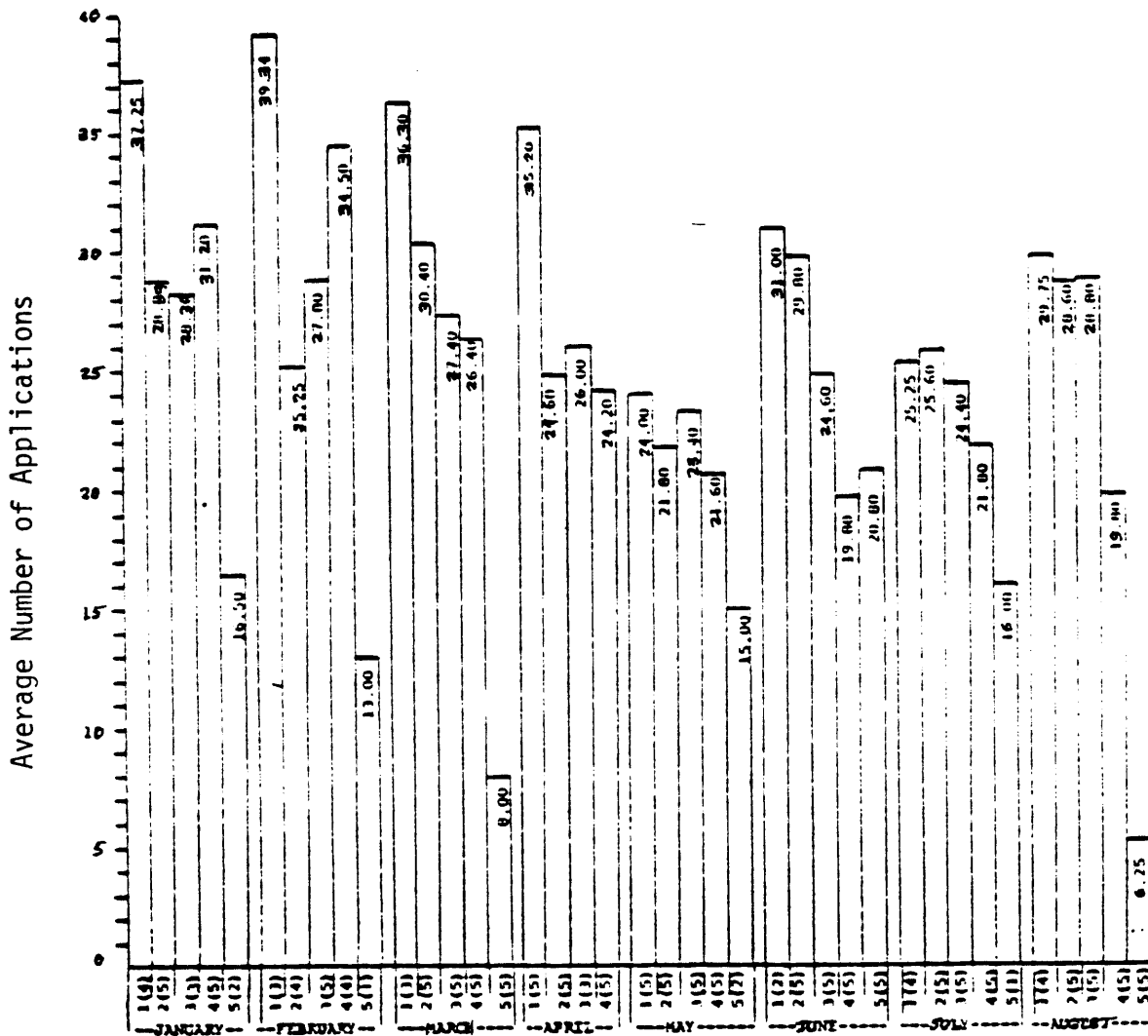
Week of Month (No. Days) and Month of Year

should be noted that the dramatic decline in the number of interviews during the last few days of long months is an indication of workers reaching their quota (and therefore taking no more applications), rather than the decline in the numbers of people entering the office to apply.

There are also at least three important changes that occur over the course of the year which influence the workload productivity of the office. First, as shown in Exhibit 4-3 the total number of applications received (and the number of interviews) varies from month to month. In peak months, intake workers have to work harder to process the applications, and the greater number of applications may have some affect on worker accuracy. Second, there are fluctuations in worker availability during the year: workers tend to be absent on sick leave in the winter months, while more workers tend to take vacation leave in the summer.

4.2 Rule 2: Workers must verify all information regarding the client.

Although it would have been desireable to observe directly the extent to which each worker verifies the information collected on each client, it was not possible to do this within the confines of the present study. However, workers reported that they start the verification process during the interview and will continue it through the required

Exhibit 4-3

FLUCTUATIONS IN APPLICATIONS BY MONTH OF THE YEAR
Massplace Office
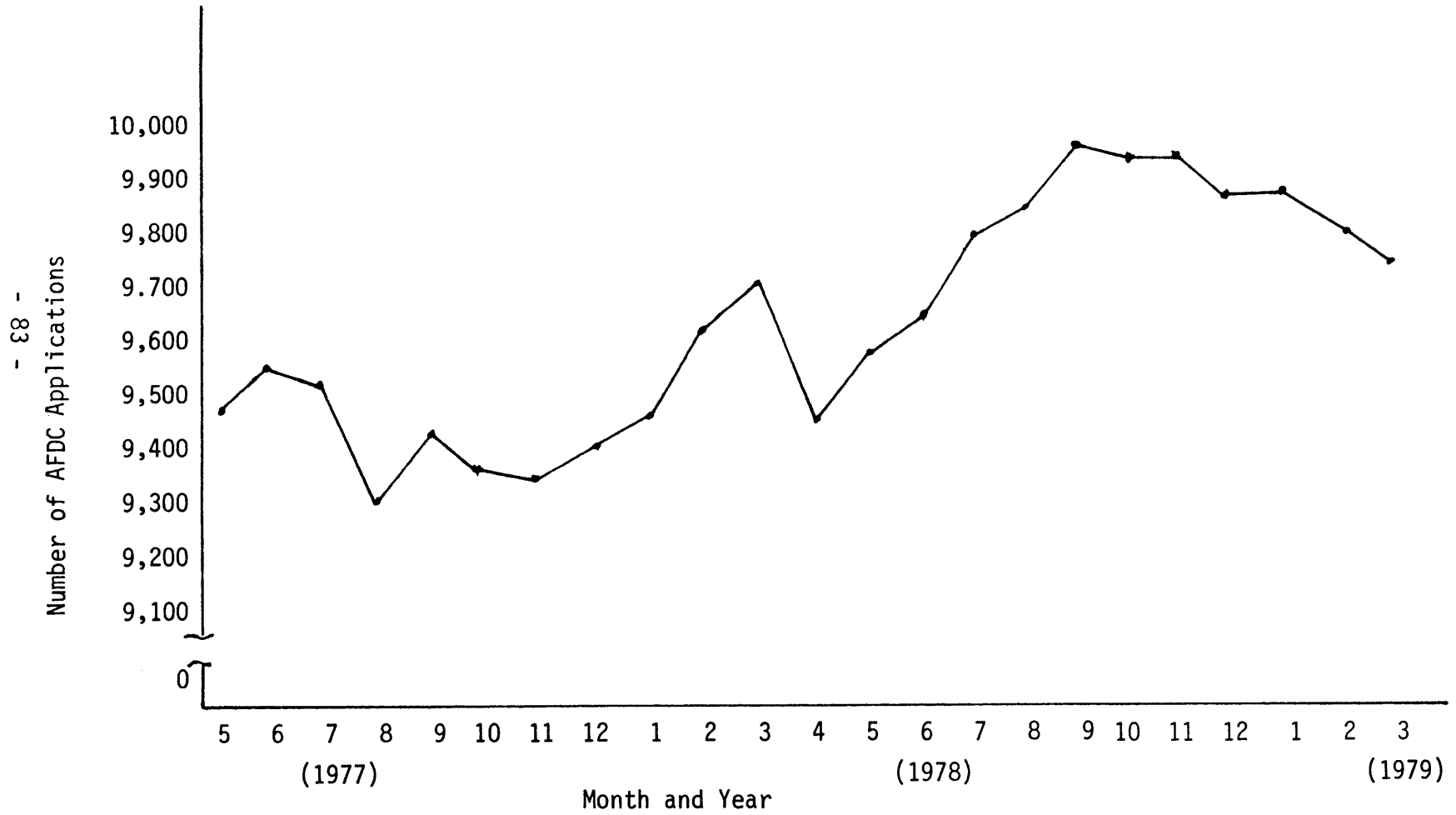
home visit. Workers have very definite attitudes about the usefulness and purposes of the home visit and there are certain patterns and attitudes that emerged in discussion with workers. Some workers feel the visit is important and will do it regularly, while others feel that it is a waste of time and will rarely do it. Workers will also use available outside sources to confirm the client's situation. It appears that the extent to which workers verify information is a function of their coping behavior and basic attitude toward their job.

Workers may also ask clients to return to the office with additional information that is needed to complete the application. Some clients do not know what information is required of them during the application interview, while others are knowledgable from previous visits to the office. It is a matter of worker style whether the worker asks the client to return to the office with the information or whether the worker simply waits to pick up the information during the home visit. Exhibit 4-4 shows the total number of follow-up visits for each worker during the period of observation. These visits may not all be required by the worker but may be initiated by the client to check on the status of the application or just to visit. Note that Gibbons had 20 clients return after the initial interview while Chase had 78 clients return for the same period. The number of return visits is significant because of the travel expense involved and the need to find a babysitter for the child(ren). Exhibit 4-5 indicates the total number of meetings each worker had with his or her clients.

Exhibit 4-4

NUMBER OF FOLLOW-UP INTERVIEWS
April 24 through May 27, 1980

Worker	No. of AFDC Follow-up Interviews
Pope	10
Gibbons	20
Shepard	26
Grant	30
Crocker	32
Little	32
Chambers	34
Charles	35
Hollins	37
Clemson	41
Rogers	42
Smith	44
Stafford	50
Hunter	67
Chase	78

Exhibit 4-5

TOTAL NUMBER OF WORKER-CLIENT MEETINGS
April 24 through May 27, 1980

Worker	Total No. of AFDC Cases Processed	Total No. of AFDC Client Meetings
Pope	6	16
Gibbons	24	50
Little	16	51
Shepard	21	52
Crocker	20	58
Clemson	20	61
Grant	28	61
Chambers	24	62
Charles	25	67
Hollins	28	69
Rogers	24	71
Smith	29	76
Stafford	27	82
Hunter	25	96
Chase	24	108

Program regulations require that virtually all of the information elicited from the client be verified through the appropriate documentation. Full documentation of the facts must be presented in the case record, otherwise the case will be considered to be in error. Workers in the Massplace Office were quick to point out that obtaining the required verifications and documentation was perhaps the most frustrating part of their job. Verifying information, like elicitation, can be complex and problematic. On the one hand, state laws protect client privacy, and on the other, cooperation from other public agencies can be very slow.

Verifications are usually accomplished through documents supplied by the clients, other people, e.g., the landlord, and agencies such as schools (to verify the child's enrollment), business (to verify past employment) and government offices (to obtain social security numbers or birth certificates). However, applicants rarely bring with them all the verifications needed during the intake interview. More commonly, applicants are missing birth certificates, pay stubs, rent receipts, etc. which they are instructed to drop off as soon as possible or have ready for the home visit. The following four conditions were suggested by workers or observed to inhibit the verification process and to contribute to error: client delays in submitting verifications, slow responses from other public agencies, privacy laws protecting clients, and the requirement of for a home visit. The criticism of the home visit as a verification mechanism also raises a parallel issue of worker safety

while in the field.

4.2.1 Client Delay in Submitting Verifications

If the documents were not given to the worker at the time of the
home visit [3] or submitted within a week after the visit, the worker
begins to process a denial for the application. Whether the worker
pursues -- either through a telephone call or letter -- clients who do
not turn in the necessary materials is a matter of personal discretion.
While most workers interviewed indicated they would attempt at least a
follow-up call before denying the case, some indicated they had little
tolerance for such clients. The few workers in the latter category set
definite time limits for the client and made it clear that if the
materials were not back in ten days the case would be denied. Their
feeling is that if the client cannot at least make the effort to call
them and explain the delay, why should the worker bother to help the
client.

In reaction to these lengthy and often frustrating delays, it
appears that intake workers often devise their own system for getting
clients to submit verifications quickly. One worker described her system
which tied the documents to the Food Stamps application. Since most
clients who apply for AFDC also apply for Food Stamps, and since the

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3. Some workers indicated that 40 to 50 percent of the clients still do
not have all the verification needed at the time of the home visit

client has to wait at least an hour or more while the Food Stamp forms are processed, the worker instructs her clients to use that time to collect verifications. For example, the worker cited the case of a client who was eligible for $367 in Food Stamps and who needed nine pieces of verification in order to prove eligibility for AFDC. The worker told the client to go home, get the nine documents amd that when he came back the worker would give him the food stamps. Essentially the worker is complying with the requirement that the client be given Food Stamps on the same day that he applies. However, the client is also given the mistaken impression that his Food Stamps may be in jeopardy if he does not proceed with collecting the verifications as quickly as possible. The worker reported that she doesn't use this technique very often, but if it appears that the client would have to wait a long time and that the verifications are relatively easy to obtain, she will encourage the client to do so.

Many workers perceive an increasing client reluctance to comply with the verifications requirement, but could not explain why this was occuring. One intake worker observed that,

> for the most part, these are people who don't know how to manage their lives or their money, and they think that by coming on welfare they can get rid of these problems. Many people just want to walk in the door and get a check with no verifications.

Another intake worker felt that clients should expend more effort in getting verifications:

> ...people who apply for welfare are often too hesitant
> to do things for themselves. They're too content to sit back
> and I don't think its good social work. I think people
> should have to do things for themselves, and I put the burden
> on them.

Another comment on the problem of verifications came from another worker:

> Clients are not used to functioning in an environment
> where they have to produce something. This is why its so
> hard to get verifications -- clients are not used to
> deadlines or obligations.

4.2.2 Slow Responses from Other Public Agencies

Delays are not always the client's fault, however. Some workers

pointed out examples of where they had held applications open up to the

last possible day in order to help a client who was having difficulty

obtaining verifications but was actively trying to meet the agency's

requirements. As a last resort, the worker may decide to accept some

other form of verification. Explains one worker:

> The problem is getting a birth certificate from Puerto
> Rico within 22 days -- it simply can't be done. We often
> have to get an affidavit from a neighbor regarding ther
> child, or in a few cases we may leave the child off the grant
> pending the receipt of the birth certificate.

The problem also arises with incapacitated or disabled applicants:

clients have a hard time getting their doctors to send the necessary

medical verifications.

Similarly, when schools get inundated with verification requests

but have no extra staff to process them, they often simply ignore the

requests or take four to six weeks to process it. Employers are reluctant to get involved with the system, filling out forms or digging through old records for missing data. There can also be a great deal of resentment in the overlap in the requests to the employer with one form being used for AFDC and another, separately mailed form request for Food Stamp information. Even Social Security causes severe problems through a four to eight month delay in getting Social Security numbers assigned. Individually these delays may seem short, but together they intensify the time pressure on the worker, who is being held accountable for completing the application within a fixed period of time. Many worker left no doubt that a major portion of their day in the office was spent on the telephone trying to get these other sources to return the requested materials.

4.2.3 Laws Protecting the Client's Privacy

A third condition that slows the verification process in Massachusetts is that workers must rely entirely on the client for all verifications (although many workers feel that the burden should be on the client anyway). Under current state regulations protecting client's right to privacy, workers are not allowed to contact other people or agencies directly unless the client have first given her permission in a signed release. This does not prevent the worker from acting on anonymous telephone calls from neighbors of friends alerting the agency to client fraud. For example, some workers may go ahead and contact the

employer if they suspect that the client is working but not reporting it. In general, however, the processing of the case can proceed only as quickly as the client acts to provide the verifications or give his permission.

4.2.4 Questioned Usefulness of the Home Visit

Workers are required to do home visits on all applications, redeterminations, and prior to case closings. Since state regulations mandate only that the visit be done, the frequency, duration, and content of the visit is a function of the worker's involvement in the case and the worker's perception of the visit's purpose.

Workers disagree about the usefulness of these visits. Some workers describe them as being fairly important for understanding the client's situation. They feel that the information about the presence of children in the home, evidence of one parent being absent, and evidence of need for other services is more accurate when collected in the home, and that counseling and referral would be more appropriate at that time. However, no special techniques are used to look for evidence of the absent parent or to assess social service needs. The worker simply looks around the area visible to him or her during the interview, watches the children if they are present, and listens to the client talk about her problems. This kind of informal interaction also has a special importance to the worker: it provides a sense of "closeness" to the client that is otherwise missing, and it fulfills the need to perform as

a social worker rather than just a paper processor.

Other workers feel that home visits have little importance and are a waste of time. But because the state requires that a home visit be done on every applicant prior to approval, the worker waits until she is certain of eligibility before going out to see the client. For these workers, the home visit is done only after all verifications are submitted and as the last item before the formal approval decision. Thus, the time period between the initial interview and the home visit is much longer than between the home visit and the final decision.

Still other workers show a combination of attitudes: they will do a home visit on each applicant in order to pick up the remaining verifications from the client and thereby speed up the decision process. Like the first set of workers, all of the third group's applicants get a home visit, but in contrast to the first group, the disposition time for the third group is much shorter. In this example, all three workers are complying with the formal requirement of a home visit on each approved case. However, the three groups of workers differ greatly in their interpretation of the purpose of the regulation.

4.2.5 The Physical Danger to Workers on Visits

If client hostility (discussed below) constitutes a threat of physical harm to the worker while in the office, then robbery and rape constitute the threat of harm while in the field. Physical safety is a major concern for workers, at least in urban welfare offices. Most

female workers said they routinely would not do a home visit to a male General Relief client. Instead they would ask the client to come into the office for a redetermination interview. Similarly, home visits would not be done on AFDC clients who lived in "dangerous" neighborhoods. It is left to the worker's discretion whether to do a particular home visit and supervisors easily agree to the worker's request to substitute an office visit for a home visit.

The problem of personal safety is particularly acute in racially mixed areas. For example, in Boston, the Hancock Street service area spans a number of communities in Dorchester. The strong ethnic character of each neighborhood has created problems for workers and clients alike. Black clients and workers have expressed concern about travel to and from the Hancock Office, as it is located in a predominantly white, low-income community in which frequent racial incidents have occured. Conversely, white workers have expressed concern about travel into those predominantly Black and Hispanic communities in Dorchester. The racial tension that seems to pervade the city of Boston as a whole only serves to aggravate the stress that workers experience in the everyday execution of their job. Although some workers make an effort to team up with another worker doing home visits in certain neighborhoods, most workers simply ask the client to come to the office.

One Black caseworker reported that she could "feel the resentment" when she went to the home of a white family. When she started as an intake worker in 1973, white family members were uncomfortable because

their worker was a Black woman. "They would open the door and the minute they did, you could see how they felt -- this is it, I've really hit bottom now." The client would answer questions, but refuse to look at the Black worker while doing so. Instead she looked around the room avoiding eye contact. Feelings of white families intensified further when busing became an issue. One Black worker just stopped making home visits in Savin Hill because groups of white youths harassed her as she walked to and from her car. She felt that if something were to happen to her in that community, she would not get the necessary police support; whereas she felt that a white worker would get police support in a Black neighborhood. She felt that the police would probably tell her that she "had no business in the area anyway" even though it was her job to be there.

Thus, the threat of physical harm from either crime or racial harassment can directly affect verification of information by prompting workers to substitute office visits for the required home visit. One worker who had cases in a dangerous neighborhood indicated that she did fewer than half her redeterminations as home visits. [4] Not only was it safer but it gave her more time to do other office work as well. Workers also complained of problems with dogs and suggested that the office

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4. On one series of home visits in which I accompanied a female worker, the worker commented that she was going to do home visits on three cases she had had for two years but hadn't seen previously. On this day she felt it was "safe" to do the visits because she was accompanied by a male.

supply them with mace or other protection. Several of the workers noted

the danger involved in home visits and at least one worker raised the

issue of an office dress code. Whereas female workers are required to

wear dresses in the office and present a neat appearance, such an

appearance in a particular neighborhood during a home visit would likely

attract unnecessary harassment or physical harm. This particular worker

usually went home and changed into blue jeans or similar attire before

going to the home visit.

4.3 Rule 3: Workers must reach a final decision whether a

client is eligible for assistance.

Once the intake worker has accumulated all the relevant information

on the applicant and completed the budget worksheets, she [5] must decide

on the client's eligibility. Workers usually review the designated

points of eligibility as they record all the verifications and compute

the applicant's budget. Any questions the worker has about eligibility

parameters are checked out either in the assistance payment manuals or

with the supervisor. The worker finally considers all of the information

and requirements and reaches a decision as to whether the applicant is

eligible for assistance. The eligibility decision is a complex and often

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5. Since the majority of intake and on-going workers in welfare offices
are women, the pronoun "she" will be used throughout this paper.

intuitive one on the part of the worker.

At the same time that the worker collects information pertaining to financial eligibility and begins to compute the client's available resources, the worker is also beginning to compute the amount of assistance to be paid. The amount of AFDC grant is essentially the difference between what the client has available as total resources each month and the income standard established by the state legislature. For example, if a family of four had $280 in available resources each month, then they would be entitled to approximately $379.30 (i.e., the established standard) - $280 = $99.30. The exact monthly grant would be slightly different from this figure because of the payment of quarterly grants and because of certain other deductions. The potential for errors in payment arise in part from the errors in eligibility, e.g., incomplete information, and in part from the complexity of the grant formula itself.

During the intake interview, the worker decides whether the client appears to be eligible for assistance and, if so, will complete an application for the client. Once the application is taken and logged in, the worker must process the case and eventually reach a decision as to eligibility. Exhibit 4-6 shows the disposition of AFDC cases for the 15 workers. Note that Gibbons approved 75% of the applicants while Charles approved only 36%. Since all applicants are randomly assigned to workers, we would assume that the approval rate for workers would be about the same. However, from the client's perspective, the random assignment to

Exhibit 4-6

DISPOSITION OF AFDC APPLICATIONS
By Worker
April 24 through May 27, 1980

Worker	No. of Applicants Approved	Percent of Applicants Approved	No. of Applicants Denied [1]	Percent of Applicants Denied [1]
Gibbons	18	75	6	25
Grant	20	71	8	29
Pope	4	67	2	33
Chambers	14	58	10	42
Rogers	16	57	8	43
Stafford	15	56	12	44
Hollins	15	54	13	46
Shepard	12	52	9	48
Little	8	50	8	50
Smith	14	48	15	52
Crocker	9	45	11	55
Clemson	9	45	11	55
Chase	10	42	14	58
Hunter	10	40	15	60
Charles	9	36	16	64

[1] Includes applications which were withdrawn or formally denied.

Gibbons as opposed to Charles means that the chances for getting assistance are twice as good. This suggest that factors other than strict eligibility may enter into the workers decision to grant aid.

Earlier in this section I noted that workers differ in their approaches to interviewing clients and also differed in their self-perceptions as advocates or adversaries of clients. These attitudes became critical in the final stages of the eligibility process when the worker has to finally decide if the client is eligible. It is at this point that the worker must assemble together, evaluate, and interpret a large amount of information. As the worker does this, the worker is free to decide how lenient or strict he or she will be in the application of standards. For example, the extent to which the worker includes or excludes specific items of income (earned or otherwise) in the trial budget can dictate the instant denial of a case. The lenient worker may "overlook" a minor source of income or missing verification in the belief that the "grant payments are too low anyway", while the strict worker may exert additional pressures (i.e., questioning) of the client to reveal even the smallest source of income. Workers know that by controlling the degree of the standard (and therefore the approval or denial) they can also influence the amount of subsequent work that has to be done for the case. As an extreme example, it generally takes much less work to close out an earned income case than to recompute the budget for AFDC and Food Stamps after each change.

4.3.1 Evaluating Numerous Budget Items

Although the formula for computing the size of the AFDC grant payment is clearly described in the state policy manual and is structured on a special budget worksheet, the computation is made very complex by the number of factors to be considered and the number of steps to be taken. Each factor or each step creates the potential for error and the more steps the more likely an error. The large number of factors was highlighted by an HEW official in testimony before the U.S. House Ways and Means Committee. Assistant Secretary Morrill illustrated the complexity of the worker's job with the following hypothetical example:

Mrs. Jones' husband deserted her and their three children -- Robert, age 16, John age 13, and Dorothy age 7. Mrs. Jones works in garment factory and, like many garment workers, has irregular hours and earnings each month. Robert, the 16 year old, is a half-time student and holds down a part-time job.

John, the 13 year old, is a full-time student and has a morning paper route. Dorothy, the 7 year old, is in school and Mrs. Jones hires someone to provide part-time child care for Dorothy.

Let us suppose that Mrs. Jones decides to apply for AFDC. To determine the family's eligibility, the caseworker would go through a calculation somewhat like the following:

Mrs. Jones monthly gross income is added to that of Robert's (the income of John is not considered since he is under 14, although it would be considered if he were 14 or older).

From this total income, the caseworker deducts work-related expenses, car fare, special uniforms, taxes, and what not, including the cost of Dorothy's child care expenses. The resulting net income is subtracted from the needs standard in the state to determine whether or not the family is eligible.

Mrs. Jones must register with the WIN office within 60 days to be eligible even though she has a regular job. Also Robert would be required to register with WIN if he were less

than a half-time student (since he is 16 or older). Additionally, Mrs. Jones must be refered to the Child Support agency within three days. Now that we know the family is eligible, we must calculate the benefit amount. To do this, the caseworker goes back to Mrs. Jones' gross income. Robert's income, which was used in determining eligibility, is now disregarded since he is a half-time student.

From Mrs. Jones' gross income, the caseworker subtracts $30, then another third of the remaining income, then work expenses are subtracted from the remaining income, then finally child care costs are subtracted.

This leaves us with countable income. Countable income is then subtracted from the payment standard for the family to determine the actual benefit which Mrs. Jones family will receive. To further confuse matters, the payment standard in many states is not the same as the needs standard that we started out with.

Now that we have an initial benefit payment for Mrs. Jones family, we must realize that the payment will change month to month depending on how much she earned in the garment factory, and how much her work expenses vary.

For example, the assistance payment for Mrs. Jones' family will vary each month depending on how often she continues to work during the rush hour, when bus fares are higher, and how often each month she commutes during non-prime time.

Each change in income, expense, and family status must be reported and the benefit payment adjusted accordingly.[6].

Although this example may seem extreme, in many ways it is overly simplified. It does not include, for example, accounting for family resources, unearned income, work and training situations, or home produced goods; nor does it include the eligibility for the related programs of Food Stamps and Medicaid.

4.3.2 Making Complex Computations

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6. William Morrill. Testimony before the Subcommittee on Oversight, Committee on Ways and Means, U.S. House of Representatives, May 3, 1976

The above example is also oversimplified because it lumps together the several computations needed to determine combined income and to deduct allowable expenses. I will take another example to illustrate these additional steps. Workers compute the client's income, eligibility, and grant amount in Massachusetts all on a single "AFDC Budget Worksheet" (see Exhibit 4-7). The worksheet is set up with six subsections, A through F. The first step of the computation of net income is to enter "Gross Income from Wages" for the month, calculated from the last five consecutive pay stubs. In the example shown in Exhibit 4-7, the applicant has a gross average weekly pay check of $105.10 for each of the past five weeks (if the five amounts were different, they would be averaged). The weekly gross is then converted to a monthly gross monthly income by multiplying by four and one-third. The monthly gross ($451.10) is entered on the first line of section C.

The second major step is to add in the gross income from self-employment to yield "Total Gross Earned Income". Next, the worker moves to Section A and calculates the employment related deductions from the earned income. In this example, the applicant has deductions for taxes ($35.05), carfare ($15.00), standard work allowance ($23.00), and health insurance ($19.00) that total $92.75. Moving from section B, the worker calculates any business expenses from self-employment and enters the total here ($0.00 in this example). The total of the two sets of deductions ($92.75) is entered into Section C.

The final steps for the worker in computing net income are to

Exhibit 4-7

AFDC BUDGET WORKSHEET

EVALUATION OF INCOME/BUDGET WORKSHEET

Name __EXAMPLE__   Effective Date _____

Address _____   Number Included in Grant __4__

Does applicant have earned or unearned income?   YES ☑   Food   PA ☐
If yes, complete sections A through F.   S ☐   Stamps
If no, complete section F only.   NO ☐   NPA ☐

A. Employment Related Deductions from Earned Income (Monthly)

Taxes - Fed., State, FICA	35. 05
Transportation	15. 00
Work Related Expenses	23. 20
Child Care	0. 00
Other	19. 50
Total Deductions	42. 75

B. Business Expenses from Earned Income

Self Employment Deductions (Specify)	0. 00

E. Income Disregard

Gross Income from Wages	451. 10
Gross Earned Income from Self Employment	0. 00
	451. 10
Less Total Section B	— 0. 00
	451. 10
	— $30.00
	. 421. 10
Less 1/3 Remainder	—140. 35
	280. 75
Total Section A	— 92. 75
Total	188. 00

C. Net Income (Intake only)

Gross Income from Wages	451. 10
Gross Earned Income from Self Employment	0. 00
Total Gross Earned Income	451. 10
Total Deductions A + B	— 42. 75
Unearned Income	+ 0. 00
Net Income	358. 35

D. Test of Eligibility (Intake only)

Consolidated Grant	379. 30
1/3 Quarterly Payment	40. 00
Total	419. 30

If the total of Section C exceeds the total of Section D, an applicant is ineligible for ADFC assistance.

F. Monthly Grant

Consolidated Grant	379. 30
Total Section E	—188. 00
	191. 30
Unearned Income	— 0. 00
	191. 30
Protective Payments	— 0. 00
Monthly Grant	191. 30

_____
Social Worker Signature

HS-3 REV. 6/78

calculate any unearned income, enter it in Section C, and total all income sources and deductions. The net monthly income for the applicant in the example is $358.35.

After the worker has figured the monthly income. that amount must be compared to the state standard of need in order to determine financial eligibility. To do this, the worker first looks up the consolidated grant amount for the applicant's family size. For example, if the family unit is the mother and three children, the consolidated grant is $379.30. The worker enters this amount in Section D and adds to it one-third of the extra quarterly grant payment. Since the net income ($358.35) is less than the state standard ($419.30), the applicant is eligible for AFDC.

Thus far the worker has only tested for eligibility; now she must go through an additional set of calculations to compute the monthly grant amount. The monthly grant is calculated in Section F using the consolidated grant amount from Section D and subtracting the income disregard from Section E. The income disregard starts with the gross income from wages ($451.10) and is decreased by the amount of gross earned income from self-employment ($0.00), both from Section C. Next, the worker subtracts the self-employment business expenses ($0.00) from Section B and the standard $30.00 deduction for all grants. The worker the subtracts one-third of the remaining amount ($451.10 - $30.00 = $421.10 - $421.30/3 = $142.35 - $421.10 - $140.35 = $280.75) and subtracts the employment related deductions from Section A. The total

income disregard ($188.00) is then entered back in Section F. Next, the worker subtracts any unearned income indicated in Section C and subtracts any protective payments ($0.00) applied to the applicant. The final total is the monthly grant amount the applicant will receive.

Financial eligibility and budget computations were not mechanized in most offices in Massachusetts at the time of this study, although the state was experimenting with the use of mini-computers in a few offices to handle these routine calculations. At best, workers would bring in their own pocket calculators to help cut down on arithmetic errors and at worst would do the calculations with pencil and paper. According to the Quality Control review for FY 1978, approximately 2% of the errors found in the AFDC caseload were due to mistakes in arithmetic, with most of those mistakes resulting in an overpayment to the client. The small number of mistakes found contributing to underpayments most likely reflects the corrective mechanism of the client appeal rather than any bias on the part of the the worker.

4.4 Rule 4: Workers must approve all eligible applications within 22 days.

Several court cases in Massachusetts have established time deadlines for approving eligible cases (but not for denials), and cases which extend past the deadline are subject to litigation. The worker can

dispose of the case at any point during the available time once all the required information has been submitted. Exhibit 4-8 shows the average time each worker took to approve AFDC cases and the average time to dispose of cases. Note that Shepard approved clients, on the average, in only five days whereas Stafford held the case for 22 days (the full amount) before giving approval. Note also that Gibbons denied cases after an average of only 6 days while Stafford again took 23 days for the same action. From the client's perspective, the additional time used by one worker to approve a case translates directly into a dollar amount of assistance, since aid starts from the date of the decision. Also the rapid denial of cases suggests that perhaps not all the necessary information was considered in making the decision.

If workers feel most driven by quotas, their second greatest sensitivity is to the mandated time constraints for processing applications and redeterminations. Under a federal court order [7] the state is compelled to process a person's application and to provide that person with a check or a denial notice within 30 days of the date the application is signed. To allow for its own computer processing, internal delivery, and the delays of the U.S. mail, the state has imposed its own deadline for a worker to complete an eligible case within 22 days. Thus, most of the attention in intake is focused on the status of each application at the end of the day.

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7. Fortin v Minter, U.S. District Court, Massachusetts 74-5065K, 1975

Exhibit 4-8

AFDC APPLICATION PROCESSING TIME
By Disposition and by Worker
April 24 through May 27, 1980

Worker	Av. No. Days for Approval	Av. No. Days for Denial	Av. No. Days for Withdrawl
Shepard	4.8	15.0	3.0
Hollins	6.1	15.3	2.0
Hunter	7.5	15.3	3.6
Pope	9.0	17.0	---
Gibbons	9.4	6.0	1.0
Grant	10.7	21.0	6.0
Little	13.4	16.8	---
Clemson	13.7	12.3	5.0
Crocker	14.8	18.2	5.0
Rogers	15.8	20.2	3.5
Chambers	15.9	19.3	21.0
Chase	17.0	20.5	14.3
Charles	17.0	16.0	7.3
Smith	17.2	15.2	---
Stafford	22.0	23.0	---

Unit supervisors carefully monitor the register of applications to identify those applications which are approaching the time limit for processing. When he identifies such a case, the supervisor goes to the worker, asks to see the application, and reviews the case circumstance. In most instances the worker is waiting for some additional documentation, e.g., medical reports that have to be turned in or the arrival of a birth certificate. For those cases which are delayed beyond the deadline, approximately 80% are due to clients not submitting all of the necessary documentation and only 20% are due to workers not completing their work. For example, it is not uncommon for a worker to be in a situation where she is given 22 days to process an application but the client cannot get a doctor's appointment for at least four weeks.

The heavy emphasis on timeliness and the worker's desire to finish a case as quickly as possible appears to have taken its toll in the treatment of clients and the collection of information. Several workers commented that they were not always able to spend as much time as they would like interviewing the client or at the home visit because of the rush to meet the deadline. On-going workers also frequently criticized intake workers of not adequately documenting a case before approving it. Intake workers responded to the criticism saying that if they hold the case until all the documentation is in, the case would extend beyond the 22 day limit and the office may be sanctioned. Thus, the court imposed time constraint has resulted in the elimination of much of the

information that used to be collected on the client and inhibits the intake worker from building an overall picture of the family that is useful in providing assistance.

For the past two years the state office has been reinforcing it's emphasis on timeliness by circulating quarterly management indicator reports that note the degree to which a local office is in or out of compliance. The Massplace office administrator was quite critical of these indicator reports for two reasons. First, it might take as much as six weeks to get a new case registered on the computer and the delay results in the office not being given credit for work that is actually complete. This delay makes the management indicator reports frequently in error. Although these time delays affect all offices across the state equally and therefore "average out", the office that knows how to play the game can make its performance look better than it really is.

Second, the state measures "timeliness" of application processing differently in different local offices around the state. The regulations stipulate that the worker is to terminate the application if any verifications are still missing after 22 days. In some offices, if the client comes in with the missing verification on the 23rd day, the denial is allowed to stand and the client must begin the application process all over again. While this office policy allows the office to comply with the time requirement, it places the cost of compliance on the client. However, in the Massplace office, if the client comes in on the 23rd day, the worker is told to withdraw the denial and proceed with the processing

of the original application. While this policy places the office out of compliance with the state directive, it reduces the burden on the client and reduces the worker's time spent processing the application. The staff of several local offices felt that it was very unfair that an office was criticized for following a policy which essentially saves time and energy for both the agency and client.

In summary, this chapter has identified several environmental factors which appear to make the accurate (from the agency's perspective) implementation of policy difficult and which fosters individual variations in implementation among workers. First, space limitations, noise and distractions, and fluctuating workloads appear to affect the timeliness of the initial client interview. Second, client delays in submitting verifications, lack of cooperation from other agencies, restrictions on client information, and the requirement of a possible unnecessary home visit appear to prevent workers from rapidly processing cases and assuring valid information on each client. Third, the number of budget items and the complexity of the calculations involved in determining financial eligibility further slow the worker and make compliance with both the accuracy and accessibility requirements difficult. Finally, the court imposed deadline of 22 days for processing eligible cases appears to further divert attention away from seeing clients and toward attention to paperwork. In the next chapter we shall see that some of these same factors affect the implementation of policy under permissive rules.

Chapter 5

WORKER BEHAVIOR UNDER PERMISSIVE RULES

The second category of rules identified in Chapter 1 was that of
"permissive" rules. In contrast to the required behavior of the
mandatory rule, permissive rules authorize the individual to take certain
actions but do not impose any obligation or sanction. The permissive
rule recognizes the person's ability to make judgement on the present
circumstances and follow the appropriate course of action. The
permissive rule officially delegates authority and discretion from the
policy maker to the worker.

In this chapter, I discuss three permissive rules found in the
eligibility process in the Massplace office. The first rule permits the
worker to determine when during the day the worker will meet with the
client. Workers are given the discretion to determine their work
schedule for the day and the approximate order in which to deal with
clients. The second rule permits workers to discourage people from
applying for assistance if the worker feels that the individual is
clearly ineligible for assistance. The client still has the right to
apply, but the "informal denial" of the applicant is used to save time

and resources of the agency. The third rule permits the worker to determine how much time will be spent interviewing clients in the office or during the home visit. In determining the time spent with the applicant the worker is also determining the type of activities that will transpire in the interview.

Whereas theory might predict that all workers would behave similarly under mandatory rules, one would not necessarily expect all workers to show the same behavior under permissive rules. Conditions such as the same office, same supervisor, same routine, and same mandatory rules which would lead to uniformity appear to be offset by individual values, experiences, workload, and self-image. The following discussion examines the observed behavior of the Massplace intake workers under the three rules listed above and explores the factors which workers reported as influencing their behavior. Note that, as with the mandatory rules, the manner of implementation of these rules can have significant consequences for client treatment.

5.1 Rule 1: Workers are permitted to determine when during the day clients will be seen.

The visit of the client to the office is usually an unscheduled event. When the client enters the office, she informs the receptionist

that she is here to see a particular worker and waits to be called. The worker receives a reception slip indicating that the client is here and the worker decides when to see the client between application interviews. Some workers give priority to returning clients while others give priority to the new applicant. Exhibit 5-1 shows the average time the worker kept the client waiting for the follow-up interview. Note that Grant kept clients waiting only 7 minutes while Gibbons kept them waiting 29 minutes. Clients report that they get frustrated waiting for the worker and seeing others who arrived at the office after they did being seen before them.

In the following discussion we will briefly describe the various fluctuations and interruptions identified by workers. It should be noted that each activity is more or less an independent timetable for the other activities, that each activity is outside the control of the individual worker, and that the demands of the various activities can be spread evenly or compound one another at various times. For example, if unit meetings are scheduled for days which are slow, then the interruption to workflow is minimal. If, however, the unit meeting comes on a day when there is a peak influx of clients or telephone calls, a worker's duty day, and the day the worker is asked to do a special project, the total and conflicting demands of the interruptions can consume all the time otherwise devoted to the processing of cases.

5.1.1 The Daily Routine

Exhibit 5-1

CLIENT WAITING TIME FOR FOLLOW-UP INTERVIEW
April 24 through May 27, 1980

Worker	Av. Waiting Time for Clients (minutes)
Grant	7.3
Pope	9.5
Clemson	13.6
Crocker	14.3
Smith	14.7
Hollins	19.2
Charles	20.0
Little	20.2
Hunter	21.6
Stafford	22.1
Chase	22.2
Rogers	23.5
Chambers	23.7
Gibbons	29.1
Shepard	n/a

Intake workers usually arrive in the office each morning between 8:45 and 9:00, although some may arive as early as 8:45 and some even after the official starting time of 9:15. Workers proceed to their desks, possibly get their morning coffee, and visit briefly with fellow workers. By 9:00 they are ready to see the first applicant for an interview.

The door to the waiting room opens to clients at 9:00 a.m., but the first applicant usually has to wait until 9:15 or 9:30 (sometimes as late as 9:45) to be seen. The interim time is required by the receptionist to fill out the half sheet log, pull the old case record, and get the interview assigned to an intake worker. The intake worker uses the time between the office opening and the receipt of the first slip to attend to unfinished paperwork from the day before. When the slip does arrive in the worker's envelope, he may either set aside the paperwork and conduct the interview or may take a few more minutes to finish the task at hand. The interview process is carried out at least three times during the morning; sometime around 10:30 the worker takes a 15 minute break at her desk or one of the lounge areas. Spare moments between interviews are devoted to paperwork.

At noon there s a shift in the intake worker's activity from office interviews to home visits. The workers takes a 45 minute lunch hour and then leave for a series of 2 or 3 home visits in the afternoon. Those workers on the opposite shift, i.e., mornings doing home visits and afternoons in the office doing interviews, usually arrive in the office

about 12:30 pm. The first home visit is usually scheduled for around 1:00 p.m. It can take the worker from 5 to 20 minutes to travel to the first applicant's house -- sometimes longer if the weather is bad. Because workers try to schedule visits in the same geographic area on the same day, it takes only a few minutes for the worker to get from one home to the next. Between 1:00 and 3:00 p.m. the worker does 2 or 3 home visits and may take a 15 minute break at some point during that time. Home visits take, on the average, about 15 to 20 minutes to complete.

Workers try to be back in the office by about 3:00 to receive client telephone calls, return calls, read the day's mail, and begin processing the paperwork from the home visits. Occassionally, there will be a returning applicant with verifications waiting for a worker when he comes back to the office. Most of the client contact in the office comes through telephone calls from applicants who want to know the status of their applications, asking about verifications, rescheduling home visits, or reporting changes and/or emergencies. Between telephone calls and brief conferences with the unit supervisor, the worker continues to process the myriad of forms and other paperwork. Toward the end of the day, the worker fills out a daily application report for the unit supervisor showing the number and type of applications taken that day. Finally, around 4:45p.m., workers sign out and begin leaving the office for home. By 5:00 p.m. the office is empty of workers and clients.

Intake workers generally perceive that mornings tend to be a much busier time than afternoons. It appears that applicants in some way feel

their chances of being taken care of are better if they come into the office early in the day. Similarly, there is a high proportion of telephone calls for the workers during the morning. In spite of the heavy influx of applicants in the morning, however, the scheduling process for interviews evens out the workload over the day. In Massplace office, for example, there may be 40 clients arriving between 9:00 and 9:30 a.m. The scheduling routine assigns each of the first seven applicants to each of the seven intake workers, repeats the process for the next seven, etc. until each worker has a total of three applicants in the morning (for a total of 21). The 22nd applicant even though he arrived at 10:30 a.m. is assigned to the first intake worker in the afternoon shift. Thus, the workload is made more even for workers at the expense of additional waiting time for the clients. Intake records for Massplace show that there is a balancing of interviews between morning and afternoon, with a little more than half (51-57%) of the applicant being seen in the morning.

The intake worker does not necessarily follow the same routine every day; on some days certain activities take priority over others. One important variation comes from spending one day each week as "duty worker". The duty worker is usually responsible for taking all the phone calls for workers who are out on leave or who are in the field. The duty worker also handles any clients who walk into the office with problems. At least one worker considers the job a mixed blessing:

You get to stay in the office all day and, if it is

quiet, can catch up on your paperwork; but you might also get
a complicated case with emergency needs that is really
another worker's responsibility.

Thus, on duty day the worker does not go into the field at all and rarely gets to do much on her own caseload. As a consequence, home visits may be done only 2 or 3 days each week.

A second important variation in routine comes from scheduled meetings. Unit meetings are held on a regularly scheduled basis in the Massplace office. On Tuesday afternoons at 4:00, for example, two intake units are scheduled to hold meetings, usually lasting 30-60 minutes.

A third variation is caused by fluctuations in client initiated workload. Intake workers indicated, and the daily interview record confirms, that more applicants come to the beginning of the week than at the end. Exhibit 5-2 shows the substantial fluctuations in intake interviews during the week. Tuesdays appear to be the heaviest intake days with Fridays being the least busy. It is also interesting to note that the peak intake day is the same day that the unit meeting is scheduled.

5.1.2 The Problem of Constant Interruptions

One condition that appears to disturb workers and contribute to error is the interruption or distraction of the worker while making calculations or completing forms. Workers try to establish routine for their job because the repetition of events such as budget computations makes the job easier and more secure. During these routine actions

Exhibit 5-2

FLUCTUATIONS IN APPLICATIONS BY DAY OF THE WEEK
Massplace Office
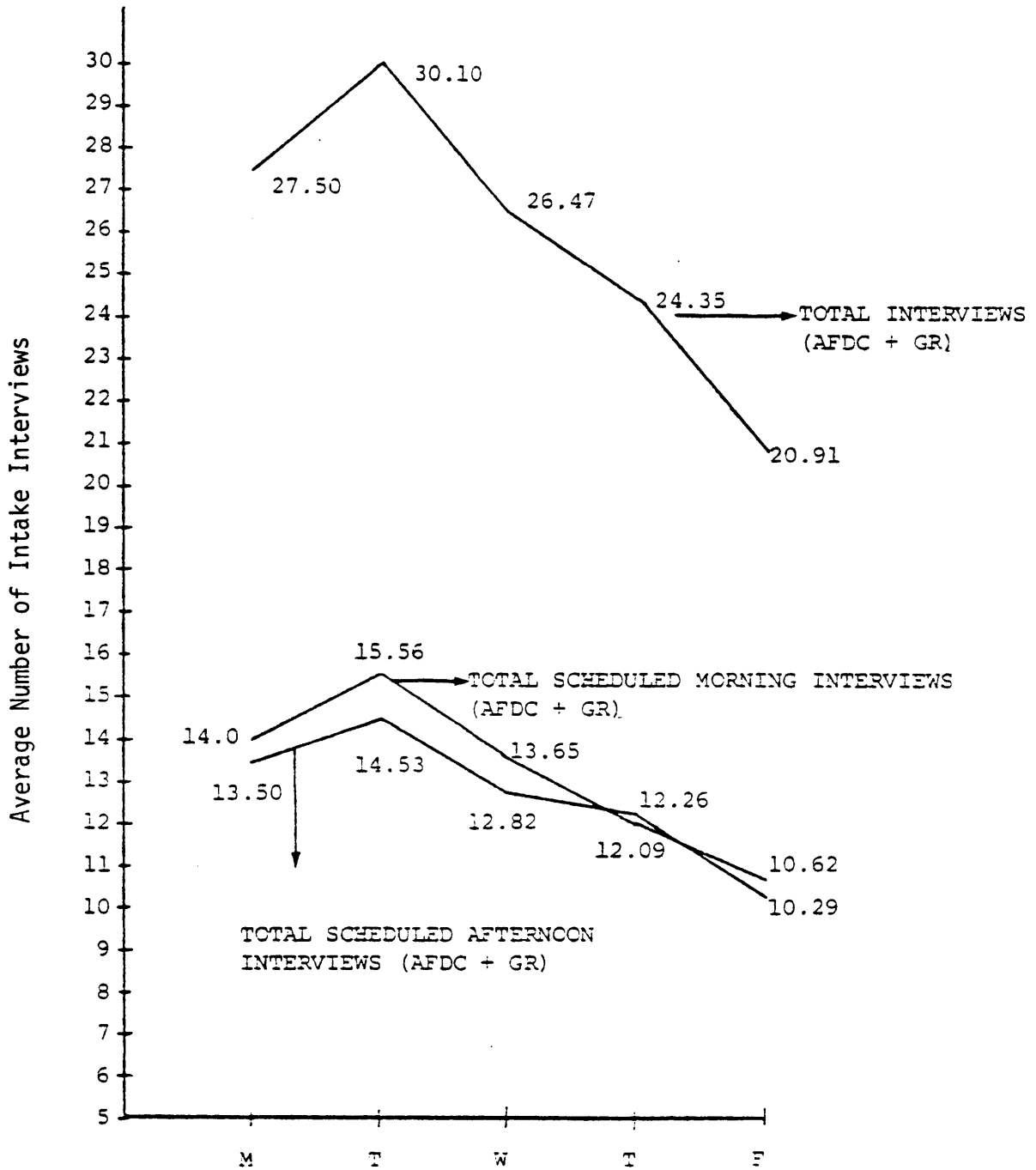
workers concentrate on the activity at hand and attempt to follow prescribed procedure. Workers reported, however, there are continual interruptions during their routines and these interruptions make it difficult for them to complete their work. For example, while a worker may have a goal of completing a case writeup on the day following a home visit, one worker suggested that "we are never able to complete a writeup from start to finish without being interrupted. As a result the writeups are always lagging behind". Client telephone calls, agency telephone calls, walk-in clients, or even special requests from supervisors are all cited by workers as constant sources of interruptions. The Massplace office receives about 290 telephone calls an hour, with the heaviest volume in the morning. The heavy influx of calls at one time minimizes the amount of other work that can be done between calls.

Both unit supervisors and the state quality control reviewers believe that the continual parade of clients and constant interruptions take a toll in terms of case accuracy. The QC reviewers have commented that when they review a case they can easily spot where a worker was interrupted in the middle of a task. The case record shows an omission of some type or a gap in the form, or an incomplete arithmetic calculation. In the work measurement study we found that workers in the Massplace office were interrupted on the average of once every two minutes (an interruption is defined as a distraction initiated by another person or some outside event). In addition, workers changed tasks approximately every 2-3 minutes and changed cases every six minutes.

With this kind of rapid changeover, no doubt there is increased likelihood for error.

Workers in the Massplace office identified a wide range of activities and distractions which they feel to be interruptions to their basic processing of cases. Among these are

- calls from a client whose house has burned and who is in need of emergency food and shelter. Taking care of a single AFDC client can consume an entire day for the worker.
- calls from clients facing imminent eviction for non-payment of rent, also requiring immediate attention. Discussions with the client's landlord or finding other housing can take several hours.
- calls from clients facing a shut off of utilities for non-payment of bills. Working out a repayment schedule with the utility company can take over an hour.
- requests for emergency assistance when an appliance breaks down and needs to be replaced immediately. Locating a new refrigerator for the client can take half a day.
- snow storms, which can make the worker's travel difficult and which brings a surge of calls for assistance from clients.
- receipt of special project assignments ranging from the checking of information to the coversion of cases.
- days on which the office is too hot or cold to work and on which the workers are sent home.
- social events, birthdays, farewell parties, baby showers, etc. which are usually held during the lunch hour but which can last into the afternoon.

It is a common misperception that workers process one case from start to finish before working on the next case. Instead, workers switch from case to case through out the day, performing small discrete tasks on each case. The daily routine for the worker consists of small amounts of work on ten to fifteen different cases, with the type of work ranging from the completion of a form to interviewing a client. It is this

constant switching of cases that may cause a worker to confuse or forget facts and which may increase the chances of error.

5.2 Rule 2: Workers are permitted to discourage individuals from applying for assistance if they appear to be ineligible.

During the first few minutes of the intake interview the worker collects information on the basic eligibility of the client. For example, if the client has no children, then clearly he or she is not eligible for AFDC. If none of the five basis of deprivation can be established for a particular applicant then the application is denied. This denial may be made either formally (if the applicant has already signed the application) or informally (if the applicant has not signed the application) by simply explaining the applicant's ineligibility and designation the interview a "nonapplication". All applicants have the right to receive a formal denial and the right to request a fair hearing. If after receiving an informal denial, the applicant requests that the intake worker issue a formal denial, then the worker must go through the rest of the interview and enter the application into the system.

Interviews which do not result in an application for assistance are referred to as "no-app" interviews and the worker receives no points for that case. Exhibit 5-3 shows the practice of "no-app" interviews among

Exhibit 5-3

NUMBER OF NO-APPLICATION INTERVIEWS
April 24 through May 27, 1980

Worker	No. of AFDC No-application Interviews
Clemson	0
Pope	0
Rogers	1
Grant	3
Little	3
Smith	3
Shepard	3
Chambers	4
Hunter	4
Hollins	4
Stafford	5
Chase	6
Crocker	6
Gibbons	6
Charles	7

the 15 workers. Note that only Clemson and Pope took applications from all of the clients they interviewed, while Charles generated informal denials for 7 of the clients interviewed. Again, from the clients perspective, the random assignment to Charles could mean that the chances are much greater for being informally denied, perhaps with no information about the right to apply. Note also that, in Exhibit 5-4, Rogers spent an average of only 4 minutes with the applicant before informally denying assistance while Chase spent 46 minutes exploring the client's circumstances.

Establishing client deprivation is made difficult by the lack of knowledge and information on the part of the client. Clients coming in for help do not always know what they want nor do they understand the differences among programs. Workers did report that clients in general are becoming more knowledgeable about AFDC and what they are entitled to, and, for example, bring some documentation to the interview with them. But there is still a larger number of applicants who know nothing about the program and have difficulty expressing their needs. No prescreening is done by the receptionist to determine the appropriate program or potential eligibility. Again, this means that before the worker can begin collecting information for the application forms, she has to get enough data to determine which program is relevant and how extensive the need is. Workers feel that they waste a great deal of time seeing people who are there for the wrong program or who are "obviously ineligible".

A procedure which parallels the "no-app" interview for saving time

Exhibit 5-4

LENGTH OF NO-APPLICATION INTERVIEWS
April 24 through May 27, 1980

Worker	Av. Time of AFDC No-application Interview (min.)
Clemson	--
Pope	0.0
Rogers	4.0
Hunter	7.0
Hollins	7.0
Grant	11.0
Gibbons	13.0
Chambers	14.0
Smith	17.0
Crocker	19.5
Charles	20.7
Little	32.0
Stafford	32.0
Chase	46.7
Shepard	n/a

for the worker is the withdrawl of an client's application once it is submitted. Refering back to Exhibits 4-6 and 4-8 we see that there is a relatively high incidence of withdrawls among five of the workers. These five workers all had more than 10% of their applications withdraw; one worker had over one quarter of her applications withdraw during the two months. Why should the number of withdrawls be significantly higher if the applicants are again randomly assigned? One possible explanation lies in the interaction of the workload quota system with the demand for paperwork.

Workers are given points for each application taken and the points are applied toward the amount of work required for the month. Since workers do not get points for "no-app" interviews, it is in the worker's interest to take applications from everyone. Once the application has been taken and points awarded, the worker must dispose of the application. Because there is much less paperwork for the worker if the client withdraws her application than if the worker must make a formal denial, it is again in the worker's interest to get the client to withdraw. The degree to which eligible clients may be denied in order to save on paperwork for the worker cannot be known from the data, and further research is needed.

5.3 Rule 3: Workers are permitted to determine how much
        time will be spent interviewing clients.

This rule is somewhat constrained by the first rule discussed in the preceeding chapter which stipulates that all clients must be seen on the day they come into the office. But it is up to the worker to decide how much time will be spent on the various tasks such as interviewing. Exhibit 5-5 shows the average duration of the application interview for each of the workers. Note that Clemson spent an average of 33 minutes with each client versus Hollins who spent 65 minutes. Thus, the client might spend twice as long with one worker as another, a fact that could influence the chance of approval or counseling. Exhibit 5-6 shows the average duration for follow-up interviews. Note that Pope spent only 5 minutes with the client versus Smith who spent 17 minutes with the

client. From the client's perspective, the amount of time the worker will spend with the client is indicative of the attitude of the agency toward their problems.

Program regulations require that workers have face to face interviews with all AFDC applicants. The eligibility system in Massachusetts, like many other states, calls for interviews in which the worker asks questions of the client, the client responds to the questions, and the worker records the information on a set of printed forms. The questioning of the applicant can be done by telephone but most often is done during interviews in the office or the client's home. While it is often assumed that eliciting information from clients in question and answer sessions is a simple and straightforward task, there

Exhibit 5-5

DURATION OF INITIAL INTERVIEW
April 24 through May 27, 1980

Worker	No. of AFDC Application Interviews	Av.Time of Interviews (minutes)
Clemson	20	33.5
Gibbons	24	38.7
Rogers	28	41.5
Charles	25	41.7
Hunter	25	44.5
Smith	29	44.6
Grant	28	46.7
Little	16	47.6
Chase	24	50.9
Crocker	20	51.4
Stafford	27	56.0
Chambers	24	57.3
Pope	6	60.0
Hollins	28	64.9
Shepard	23	n/a

Exhibit 5-6

LENGTH OF FOLLOW-UP INTERVIEWS
April 24 through May 27, 1980

Worker	Av. Time of AFDC Interview (min.)
Pope	5.0
Clemson	7.4
Gibbons	8.5
Grant	9.0
Little	9.0
Charles	9.1
Hunter	9.4
Rogers	9.9
Hollins	14.0
Chambers	14.2
Crocker	15.4
Stafford	16.1
Chase	16.6
Smith	16.6
Shepard	n/a

are actually several factors that complicate it. Accurate information from the client is a necessary (but not sufficient) condition for the correct determination of eligibility.

Workers may elicit information from the client in whatever manner they choose during the interview and subsequent client contact. It is very difficult to characterize the eliciting of information, but through observation it is possible to characterize workers style. Each worker admits that their style is probably different from the other workers and they follow what works for them. The style of eliciting information has definite implications for the client during the interview and represents to the client the attitude of the agency in general.

5.3.1 Worker Approaches to Interviewing

As workers begin to build their experience at interviewing clients they also begin to develop their own "style" of interviewing. Naturally, the style of questioning clients varies from worker to worker, but it is possible to identify at least two basic approaches. The first approach, adopted by workers who are very much paperwork oriented, views the primary purpose of the interview as the filling out of forms. The interview is often begun with a statement that there are certain forms to be filled out and the worker follows with the first question on the application form. The order of the questions asked the client is approximately the same order as the questions appear on the application form. When the forms are completed the interview is over. Workers

reported that the advantage of this approach is the speedy processing of clients and the elimination of a lot of unnecessary conversation.

The "paperwork" approach does appear to be efficient in terms of the rapid completion of one interview and the servicing of the next waiting client. However, there are at least two potential conditions for error. The first is a negative reaction on the part of the client to this rather cold and distant treatment by the worker. A few clients with whom I spoke after such interviews reported that they felt somewhat "railroaded" by this approach. Clients reacted by only answering the questions that were asked and then with as little information as possible. Consequently, important facts or information about the client may not surface, and the worker may have to make a decision on incomplete information. There is an answer for every question on the form as required, but the completed form does not ensure that all the information has been collected. Thus, the second condition is that a worker may have a false sense of security in having followed the program regulations and therefore feels he has the facts. At this point in the process, the unreported bank account creates the potential for an incorrect approval of an ineligible applicant while the unreported additional child or expenses creates the potential for an incorrect denial.

In contrast to the paperwork approach, other workers take a "conversational" approach, i.e. they emphasize the open conversation with the client. These workers view the primary purpose of the interview as getting a complete picture of the client's situation. Specific

questions and answers do not appear to be as important as the accumulation of information and cross checking facts. Workers taking the conversational approach introduce the forms as part of the conversation rather than structuring the conversation around forms. These workers reported that such casual conversation a) helps to put clients at ease and establish rapport, b) reveals much more information (sometimes contradictory) about the client, and c) allows the worker to become much more familiar with the client's situation. Workers also feel that the clients situation is often too complex to be accurately captured by the forms alone. One worker described rapport building in the following way:

> We attempt to make clients feel at ease by establishing rapport prior to the informational questions. We let them know that the information is strictly confidential. We inform them of what verifications are required and we encourage them to talk with us -- to steer the interview. We discuss flat grants and how the family is going to manage as well as discussion of resources that are available to the clients that they might not even know exist.

Another worker said that she emphasizes "past management " i.e., during the interview revealing and confronting the clients personal history because, "this gives the applicant a chance to open up and let the whole story out."

The open conversation can serve as an important means of corroborating the client's statements even before the worker begins to check sources in the field. For example, the worker may encourage the client to talk freely about the client's problems at the beginning of the interview in order to assess the client and develop a baseline of facts.

As the interview proceeds and the client answers the specific questions on the application, the worker can cross-check these answers with the facts uncovered in the initial discussion. The worker may test out the client's honesty, recall, etc. during the interview in order to establish the validity of the information which cannot immediately be verified. If the worker has available a previous case record on the client, the worker may check the client's honesty by asking for information, e.g., employment history, which is already documented in the record. Erroneous answers to these questions may cause doubt about the other, unverified answers from the client. As for fostering familiarity, a few workers indicated that they will even go beyond the informal conversation to undertake a limited amount of counseling on family planning, money management, other services available to the client, or just sympathetic listening. The conversational approach (especially with counseling) results in a longer interview but is compensated for by the better understanding and worker's personal satisfaction.

Errors appear less likely to be incurred with this approach both because more information about the client is surfaced and because there is the opportunity to cross-check a portion of the facts. However, the conversational approach may contribute to technical errors in that certain questions on the form are never asked and completed. Further, the worker may take the case record information too seriously and fail to check for changes in the client's circumstances since the initial recording.

5.3.2 Client Ability and Attitude

But even with the most refined interviewing approaches, workers frequently encounter clients with limited abilities to communicate or with attitudes resistant to being helped. Workers noted that interviews with clients who could not read or who could not understand English often required much more time than their regular interviews and contributed to delays in the processing of other cases.

Reading Ability. Part of the client's inability to understand the program and its requirements may stem from the client's inability to read the descriptive brochures and the forms involved. The importance of client education for the commission of errors and for the accuracy of the program in general has been suggested by Bendick and Cantu (1978) in an article on client literacy levels. The authors point out that the process of requesting, enrolling, and complying with AFDC program requirements requires several literacy skills: reading and comprehending explanatory brochures, filling out forms, providing documentary proof, and responding to written notices. They found, after examining numerous agency documents, that there is a significant gap between the actual literacy level of the client and the literacy skills required by the agency. One analysis of welfare agency forms in Illinois (Cook County Dept. of Public Aid, 1963) showed that over half the brochures and forms which clients are "expected to read actually require the literacy skills of either a college graduate or someone who has been in college for some

time". Only about 15% of the documents could be comprehended by a person with an eighth grade or lower education level. Bendick and Cantu found the same problem in five other public aid programs.

As a result, Bendick and Cantu also caution against using standard education levels as measures of client literacy. Lee (1976) found that people in the poverty range actually perform one to four years below their reported level of education in terms of reading literacy. "Hence, the average person who graduated from high school should not be assumed to possess more than an eighth grade literacy skill level," notes Bendick (p.59). Studies in Chicago and St. Louis (Cook County Dept. of Public Aid, 1963, 1964) confirmed that most of the heads of poverty families have only an eighth grade reading skill. A recent study by Bateman (1981) has shown that there is an inverse relationship between the level of client education and the likelihood of there being errors in the client's case. The errors appear to be caused by the inability or unwillingness of the client to communicate complete and current information about her situation.

Speaking Ability. Closely related to the problem of client education is the problem of language. Racial differences between worker and client are likely to cause serious communication problems. A difference in their respective use of words, their dialects, and intonations can result in not only misinformation but also frustration and hostility. Bendick (1978) observed in his study of client demographic characteristics that the "literacy limitations of welfare

clients based on low educational achievement are often compounded by foreign language problems" (p.59). Bendick went on to report that in 1975, 10% of the U.S. population aged 19 and above lived in households in which a language other than English was spoken. At best, these non-English speaking citizens use English as a second language, and at worst are completely unable to understand the English-only worker.

The language problems of clients and the potential communications problems were further highlighted in a recent survey of AFDC clients in the Massplace office. The survey was conducted among a random sample of clients (187 new applicants and 238 active clients). The survey indicated that approximately 78% of the clients spoke English as a native language with the remaining 22% speaking either Spanish, Portugese, French, Vietnamese or some other language. Of those clients who had a native language other than English, approximately 38% reported that they had difficulty in understanding what their worker said to them. Well over half (about 60%) of those clients having language problems attempted to overcome the language barrier by bringing a friend or relative with them to translate. Approximately 12% did come with a translator, while the other 25-30% were fortunate enough to be provided a translator during the interview (though the translator was not necessarily a worker in the office). While these findings may be atypical for welfare offices as a group, they suggest that more research is needed in the problem of language barriers.

Client Hostility. Finally, severe agitation or even open hostility

on the part of the client can interfere with the collecting of facts and thereby contribute to eligibility error. Physical outbursts, abusive language, and threatening behavior on the part of clients are an anticipated but relatively rare part of the worker's job. Clients are often defensive about their situation, embarrassed at having to be there in the first place, or irriated by prolonged waits for service. Workers indicated that less than one percent of the clients ever become hostile, but those who did were generally on disability assistance or were unemployed fathers. "They are more aggressive, more emotional, and generally more abusive of the system " noted one supervisor. [8]. Other clients who cause difficulty are alcohol or drug addicts and ex-mental patients.

The number of incidences of hostile behavior a worker encounters appears to be somewhat related to the type of case assignment system used in the office. In the Massplace office, for example, where there are remnants of geographic districting, workers assigned to certain "bad" sections of the city are likely to encounter more hostile clients than workers with other geographic assignments. In other offices where the assignment system is not geography based, the encounters with hostile clients are more evenly distributed and fewer per worker. Under either

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8. In many instances clients with nothing else to do will come to see their worker simply to talk to someone. Some clients attempt to go to the Social Security office, but because there are no service workers there, clients generally don't wait around very long. Instead, the clients will come up to the welfare office where they know they can find someone to talk to.

arrangement, supervisors reported they were called upon by workers once or twice a week to speak to clients who were agitated. Approximately 3 to 6 incidents a year in the office require police assistance.

Few workers have ever been attacked in the office, but as Bateman (1980c) reports, stories of what goes on in other offices are common knowledge among workers. Consider the experience of one worker in Washington:

> One day a man came into the office demanding that he be given money for food. He announced to the receptionist and supervisor in the waiting room that he would wait only until noon to get his money, after which time he would break every window in the office. Naturally, the receptionist and others thought he was bluffing. But at noon he picked up his chair and methodically broke every window along the front and side of the office. The man then sat down and waited until the police took him away. Later he returned and again asked for assistance. My supervisor asked me to see the client right away and to register him for assistance even though there was some question as to his eligibility.

While such outburst are rare, minor disturbances can become a daily part of the office routine. Consider also the following incident reported in a security guard's daily report:

> 1:40 p.m. - Mr. X went into the smoking room and started kicking ash cans and dumped the contents all over the floor. I asked him about it, and he says he wants Food Stamps. He does it about everyday.

As there is a greater mover toward deinstitutionalization, workers and administrators predicted that more psychopathic clients will be coming into the agency and there will be a corresponding increase in the

incidents of hostility. Workers do not like to experience such hostilities or outbursts, and they criticize the office administrators for repsonding to such behavior with preferential treatment for the client. In the workers' opinion, the supervisor's efforts to quickly process the disturbing client and get him out of the office simply rewards violent behavior and encourages other clients to do the same. One worker refered to the technique as "Bitch for Bucks".

Interestingly, several workers indicated they felt part of the client's hostility resulted from the attitude and demeanor of the interviewer:

> This is the last ditch for many clients -- they're not feeling really great about themselves. Clients can become hostile when they don't want to comply with program requirements...It is important for the interviewer to let the client know at the beginning of the interview that a number of questions will be asked in order to determine which program the client fits into -- sort of a process of elimination. 'If you don't understand why I'm asking something, ask me and I'll explain.' If you do that at the beginning of the interview it will generally defuse the client's feelings and she won't be so uptight.

Thus, hostile clients are not a constant problem but are a continual concern for the worker, and that concern is raised with every new client. When it does occur, workers have to spend the first ten or fifteen minutes of an interview just trying to calm the client and establish rapport.

In summary, there appears to be numerous external factors which influence how workers will use the discretion provided by permissive

rules. First, the agency has requirements for scheduling, minimum point counts for the month, and time deadlines which tend to shift priority to paper processing rather than to working with clients. Second, clients sometimes lack reading or language skills necessary to complete the application process and workers are not given the extra resources (e.g., time) to follow through with these clients. Third, constant interruptions from visits, telephone calls, and emergencies mean that workers must work on cases in 2 or 3 minute segments. The constant shifting of attention from one case to another increases the likelihood of errors. Even when confronted with these external demands, some workers still manage to use their discretion in ways that favor clients. In the next chapter I will discuss how the normative rules present in the office may influence workers to follow such interpretations in the face of the heavy emphasis on paperwork.

Chapter 6

WORKER BEHAVIOR UNDER NORMATIVE RULES

The third and final category of rules identified in Chapter 1 is that of "normative" rules. Whereas mandatory and permissive rules are both formal (i.e., in written form) and are formulated by the agency itself, normative rules are defined here as informal and formulated by the society in which the agency functions. Normative rules are rules of social behavior that apply to individuals regardless of work setting and which are internalized as part of the socialization process.

Normative rules are, in simplest form, expectations of how one individual will behave when interacting with other individuals. The expectations vary according to who the other individuals are and the setting of the interaction. For the welfare worker, the expectations for normative behavior come from at least five major sources. The first is from the worker himself; we each have internal standards of behavior and rules for dealing with others. The second source is the client whom the worker is serving and who carries with her the behavior standards of the community in which she lives. The third source of expectations is the at-large community in which the agency functions and, more specifically,

which provides the resources for the program. The fourth source is the welfare agency, since in addition to the formal rules handed down by policy the agency has expectations of polite and "appropriate behavior. Finally, the fifth source of expectations are the worker's peer group, both in the office and professional associates.

The normative rules from each group may or may not be similar, but each set is applied to the worker during the eligibility process. Because the rules are formulated by different groups, it is possible that the different sets of rules may conflict with one another. The difference in the backgrounds and experiences of the worker and the typical community resident, for example, can lead to very different expectations with regard to treatment of clients or the equity of the welfare system. In general, all five sources may attempt to influence the worker toward the performance which will maximize their respective goals. The extent to which any one set of expectations dominates depends on the external pressures and internal forces. Since most workers function in areas of few effective guidelines, the large discretionary component of the role means that the expectation with the greatest force can have a major influence on the worker behavior toward the client of the agency. Because it was not possible for this study to track worker behavior under specific normative rules, the following discussion is organized around the differing group expectations rather than rules as in Chapters 4 and 5.

6.1 Normative Rules and Role Expectations

Earlier I introduced the notion of the worker's role and suggested that his role goes beyond the simple job description drafted by the welfare agency. This role has both a programmed and a discretionary component. Chapter 1 explored the discretionary component and identified some possible sources for that discretion as well as a listing of discretionary actions. I want to now return to the worker's role to point out that the programmed role often conflicts with the expectations of the real world. The resulting conflict gives the worker a sense of frustration and stress and causes him to alter his behavior.

Both the role conflict and role ambiguity appear to be serious problems for the welfare worker. According to Kahn et. al. (1964) role conflict occurs whenever there is "the simultaneous occurrence of two or more sets of pressures such that compliance with one would make difficult the compliance with the other". Furthermore, "the intensity or magnitude of a person's role conflict will depend on the absolute and relative strength of the forces; that is, if there are two opposing forces, the greater the strength of the weaker force the greater the conflict" (p.19). Role ambiguity, on the other hand, occurs when a worker is given incomplete or conflicting information about his role; to be effective the individual must know what is expected of him, and what behavior will be

rewarded or punished. Thus, the worker must understand these expectations of the role and the role expectations must be shared by all members of the role set if the interaction is to be effective; otherwise the situation generates stress for the worker.

The conflict between opposing forces is even greater on the boundary personnel (b/p) discussed in Chapter 1 than on regular agency staff. Kahn, et. al. (1964) found that the requirement of performing in two worlds simultaneously is the source of considerable strain for b/p. Measuring the frequency with which roles place the individual "in the middle" between two opposing groups, the researchers found that

> The experience of feeling in the middle increases
> monotonically with the amount of time the person spends in
> business relations with persons beyond the boundary of his
> company (p. 102).

In the study, 68% of the b/p experienced higher than average role conflict while only 32% of the non-b/p showed the same results. Further, b/p experienced significantly higher tension than non-b/p. It is important to identify and understand these various stresses so that they may be compensated for in the design of the role and in creating a system of motivating incentives. If left unaddressed, these pressures will carry the individual to act independently to reduce stress, acts which may be in conflict with organizational goals.

6.2 The Worker's Own Expectations

In attempting to understand observed worker behavior, then, it is important to recognize that there is an underlying tension between the worker's self perception (and self-needs) and the requirements of their job. The workers with whom I spoke all appeared to be genuinely concerned about the client's adverse situations. These worker's were basically people-oriented and altruistically motivated -- either by professional social work training or by natural inclination -- toward actively helping people. If given the choice, it appears that most workers would want to take that helpful action sooner rather than later. Furthermore, amongst the newest workers there was an almost idealistic belief in what can -- or should -- be done for the client. Although some workers indicated they were in the system because of not being able to find work in other fields, no one indicated that they were in it solely for the pay they received.

In contrast, the responsibilities of a worker require a very different set of motivations and attitudes, causing a frustration that gets expressed at various points in the AFDC process. In situations where the worker wants to help the client solve a problem, the job requires that she primarily ask questions and fill out forms. The desire to offer a wide range of help is also bounded by the limited provisions of the program. For example, where the worker wants to provide immediate financial relief, the system postpones payment for several weeks. This

is best illustrated by the comments of one worker who had no previous in Food Stamps, but who, with a recent reassignment in the department, began to deal with clients in a much shorter time frame. She expressed great satisfaction (and amazement) that it was actually possible to help clients by providing assistance the same day they walked into the office.

There are other tensions as well. Where the worker is oriented toward sympathy for the client, the regulations clearly state the minimal conditions under which the client can be accommodated. Where the worker may be trusting, their job and the emphasis of the system is to be as thorough as possible in investigating the client, getting complete and accurate information, and closely following procedural requirements. All decisions must be thoroughly documented, a requirement that takes more time away from the personal dealings with the client. Cases of suspected fraud, for example, are particularly stressful on workers because of the simultaneous mandate to investigate the client for fraud while advocating a continuation of assistance payments.

Finally ,the desire of the worker to treat the client as a fellow human being with a certain right to privacy must be curtailed in order to obtain the required data. As mentioned earlier, several workers expressed reservation, for example, about probing into child support or paternity matters. The discussion of paternity and threatened retaliation from fathers is particularly sensitive because the worker is not allowed to simply accept the word of the client that she has or will

be harmed; the client must produce a police report or other documentation of past harm or threat. No other interaction places the worker more squarely in the role of the unsympathetic bureaucrat. In addition, some workers expressed discomfort in probing into the personal lives of their clients. Intake workers stated that they felt it was none of their business to be asking the personal types of questions related to child support. Thus, even before the worker encounters the day today irritations of the process, there is a frustration that arises from the conflict of self with the job and the rigidities of the institution. The frustration no doubt works itself out in numerous ways: workers "burn out" and leave, they bend the rules, they avoid talking about it, or they express it in humor. The last manifestation is best captured in the early morning comments of one worker: "Hey, let's make somebody rich today!"

6.3 Client Expectations

Although the client is the primary focus of the worker's activities, the client is sometimes excluded as part of the worker's reference group. In other instances, the worker is very client oriented but with tasks that clash with the self-intersts of the client. Consequently, client preferences and expectations are generally ignored until the client directly controls the rewards/punishment for behavior or

until the clients collectively can influence the organization. Clients usually expect to be treated fairly, equally, and quickly; although occassionally they expect preferential treatment. For the worker to respond to this set of expectations may accord the client a status which conflicts with the goals of the organization or the status of the worker. It may also be physically threatening. The result is a continual conflict between the worker and the client expectations which often increases the antagonism of each toward the other.

The ongoing conflict and tension over client expectations can be exacerbated by the worker's level of trust of the client and their attitude towards the fairness or justice of the welfare regulations. A staff member in one office cited several examples of frustrating clients situations or attitudes. First, a woman and her child who live with the woman's parents receive the same dollar amount as a woman and child who lives alone. Second, even in cases where there is a live-in boyfriend who is capable of support, the client is still eligible for assistance. Third, the "emancipation by birth" enables a daughter to get her own grant while living in the parent's household. Therefore, both mother and daughter are on the grant and obtaining higher benefit levels that if they were both on a single grant. Finally, the AFDC system allows mothers to quit their jobs without cause and without penalty, whereas if the father quits his job, he must wait 30 days before receiving assistance.

The same person was also displeased with the laxness of an

emergency assistance program, especially the ease with which stoves and refrigerators are "given away" by the department. He feels that clients are now taking advantage of the mortgage arrearage portion of the program and noted that clients take advantage of this service every year, using the Department to subsidize their mortgage.

In interviews with workers, the Food Stamp program also received a great deal of criticism. One worker thinks that the department is "being raped". One client, to whom he had given Food Stamps on Tuesday came in again on Wednesday using a different name and asking for more Food Stamps.

> We confronted him and he left. He could, of course, go
> to another office. The rules are too lax. Some clients have
> a lot of fun with Food Stamps. They are taking on each
> other's children in terms of family composition. They switch
> the names around. When you catch these people they don't
> understand. I've seen approached in a bar by someone who
> wanted to sell me Food Stamps.

One supervisor commented that he initiates about four fraud referrals a week, mostly for Food Stamps.

> The coupons can be given to friends or relatives.
> There are no names on the coupon and all the client has to do
> is come back into the office and tell the worker that his
> Food Stamps were stolen or lost.

6.4 Community Expectations

Community expectations of worker performance may reflect a stereotype of the role that varies across social classes. When attitudes are polarized in the community, e.g., along racial or economic lines, the worker may tend to choose among the conflicting parties, and often the choice is in favor of the groups demanding unequal biased treatment of clients. As Lipsky notes,

> Invocations to 'clean up' certain sections of town, to harass undesirables through heavy surveillance...to prosecute vigorously community 'parasites'...and even to practice reverse discrimination...-- all such instances represent calls for unequal bureaucratic treatment (1976, p.145).

Thus, there can be conflicting expectations even within this general reference group, in part due to different values and in part due to inconsistencies in the citizens' own value structure. For example, a citizen will espouse a strong work ethic but when injured or suffering from financial hardship will seek out public assistance in the form of Unemployment Compensation or Medicaid.

Workers in all the offices visited appeared to reflect the attitudes and values of the communities in which they lived. They are sympathetic towards those clients whom they think are truly needy and are frustrated when such clients are found to be ineligible for help. Workers also resent clients who are eligible for benefits but do not appear to the worker to need them. Workers consider "most clients to be pretty nice" and commented that "there is some satisfaction in providing direct help to clients". But workers also express irritation at "clients

who come in the day after they separate from their husbands -- they'll be back to their husbands in 30 days"; or clients who "get laid off from work on Tuesday and come in here Wednesday without first trying to help themselves". One worker went so far as to mention that these irritations sometimes make her forget she is there to help people:

> ...there are some people who are on public assistance who shouldn't be. I was brought up in the belief that if you're hungry, you go to work. I have had clients tell me they're getting more on assistance than working--why should they go to work?. I resent this as a taxpayer.

Several other workers mentioned that they never knew there even was a welfare system before working at the welfare office. But it is one thing to have attitudes and feelings yourself and quite another to hear them from the community. When the community comments about welfare, these comments are often directed at the workers as well, holding them responsible for what clients do. "Workers hate to tell anyone where they work because when people find out the immediate response is "Why do you let those deadbeats get money?" As workers become more experienced they develop ways to deal with their own attitudes and the attitudes of their communities. A worker in Washington reported that she is so tired of the abuse she gets at parties and public gatherings when people find out what she does for a living, that she deliberately falsifies her occupation. Now, when asked, the worker responds that she "works for the Post Office". Such comments and incidents indicate that workers are hurt by the negative attitude that the community (and even family) have of

welfare and poverty. The reaction to such community expectations and images appears to vary from indignation to embarrassment.

6.5 Expectations of the Agency

The role expectations by the agency, as discussed earlier, are primarily embeded in the programmed component of the role. The program contains a set of actions appropriate to particular situations and experience teaches the individual responses which have the desireable effect on program goals. For most workers in the agency, the programmed and informal expectations are the primary influence on real performance. But for front-line workers, however, the physical and/or psychological distance from the organization lessens this influence and strengthens that of the actors with whom the worker interacts. As a consequence of reduced sensitivity to organization expectations, the organization may monitor the worker's behavior, e.g., through quality control reviews, even more closely to ensure the worker's loyalty. The worker may, in turn, respond if they are feeling suspect; the extent of the conformity will depend on the attraction of the worker to the organization. If the worker is highly attracted, then he will more narrowly, rigidly, and exclusively interpret and apply the organization's norms and expectations (Adams, 1976).

But what happens to the worker when turmoil and reorganization in

the agency cause not only uncertainty about job security, but also results in severe job "deflation" or downgrading. This was the situation in Massachusetts at the time of this study, where the Department of Public Welfare was undergoing a reorganization to divest itself of all social service functions at the same time that it was substantially changing the formal job description of the front-line worker. By the middle of 1980, Massachusetts had created a separate Department of Social Services to provide clients with all Title XX and other services currently provided through the social workers in the DPW. The formation of the new department and the resulting changes within DPW were perhaps the single most frequent topic of conversation and concern among the staff interviewed. Most workers and supervisors alike agreed that the changes would have a profound impact on not only their daily work but also on their self-image and self-esteem.

Most of the workers in the local offices entered the Department prior to 1974 when HEW mandated that financial services and social services be split into two separate functions. Previously, the "social worker" (job title) had processed the request for financial assistance and provided counseling, service referrals, emergency assistance, etc. When the split was implemented, those workers assigned to the financial assistance functions were dismayed at the loss of what they felt to be a central part of their job -- social services. Nevertheless, the workers continued with the title of "social worker" and even continued to provide minimal levels of counseling. For the most part, they had been trained

as social workers in school, they had taken the social worker's civil service exam, they carried a caseload, they had interactions with and developed professional relationships with clients, they did home visits, and they used their own judgement or discretion to assess client situations, even tough their daily work was becoming much more clerical. In essence, although the nature of the job changed somewhat, workers' self-perception did not.

In the period from 1974 to 1979, the state policy makers concluded that the job of assistance payments worker could be even more simplified and that the entrance requirements could be lowered to utilize less qualified (and, therefore, less expensive) workers. The underlying assumption in this transition was that the work of financial assistance is basically a clerical processing that requires much less judgement and expertise than the determination of social service needs. While this assumption may or may not have been correct, the fact remained that the Dept. already contained a large number of experienced staff trained in and oriented to the social worker function.

The transition from "social worker" functions to clerical worker functions was completed on September 30,1979 when the Department abolished the title of "social worker" for all assistance payments workers and substituted the title of "financial assistance worker" at the same grade levels. Simultaneously with the title change, the entrance requirements for each grade were substantially reduced. For example, the entrance requirements for Grade 12 financial assistance worker I, which

had been a BA degree (preferably in social work) was reduced to a high school diploma and two years experience in a social service agency.

Workers expressed frustration and anger at the gradual modification of their job and the final title change. Many felt that the long term trend of deprofessionalizing their work had eliminated the job that they were originally hired to do. When asked what the purpose of their job was, workers responded with "to help people", "to determine the needs and eligibility of people applying for help", and "to help people who are needy". [9] When asked how they perceived the changes in their job, however, their answers revealed a different attitude. One worker commented

> I'm not in favor of this (the lowering of entrance requirements)...I would like to keep the level of professionalism up, although the work is becoming a more clerical type of job than it used to be.

Another responded, "I worked hard in college to become a social worker and I want to stay a social worker". Still another observed, "Morale is low... we are getting to feel more like paper pushers". One worker, also commenting that morale is a problem among his colleagues, blamed the administration:

> The state is trying to make assistance payments (AP) so

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9. When asked what they like best about their jobs, many workers talked about their interactions with clients, especially on home visits. One worker enjoys meeting her clients for the first time and "matching names with faces."

simple. Their view on AP is that you are nothing, you are a
statistic... Everything is totally impersonal.

He attributed some of the problem to the difference in accountability:

"In services you always deal with problems, but in AP you are responsible

only for doing a certain number of redeterminations".

6.6 Peer Group and Professional Expectations

Often treated as a separate source of role expectations and

normative rules is the individual's peer group, i.e., the group used as a

standard for self-evaluation. A great deal of research suggests that

behavior and productivity are greatly influenced by the norms and values

of this group. The common training, skills, and role structure create a

natural affinity, and the group serves to satisfy not only a social need

but a need to resolve ambiguity as well.

> These professional and quasi-professional
> identifications may provide the person at the boundary (of
> the agency) with referent group support in the conflict he
> faces, with techniques for resolving such conflicts, or
> simply reassurance that his difficulties are not so much a
> result of his own shortcomings as the common lot of those who
> occupy boundary positions (Kahn, 1964, p.105).

If the organization fails to meet the needs of the worker, he will turn

more and more toward the referent group for satisfaction of those needs.

The professional group will then attempt to gain the worker's support for

their goals, goals which may conflict with the expectations of the

programmed role. Worker unions, for example, attempt to set standards which often conflict with the goals of the agency.

While the existence of the union appears to influence the state-level activities and decision more than those at the local office level, it imposes at least three major constraints on the local office. First, collective bargaining virtually requires that workers be promoted on the basis of seniority alone. Second, one or two union stewards in each office monitor the temporary assignments of workers to other jobs. If a worker is being used "out of classification" more than three days, the union either requests that the worker get temporary assignment pay, file a grievance, or both. Third, the union has attempted to impose a maximum, e.g., 30 redeterminations per month, work standard for all income maintenance workers. State policy requires workers to redetermine one-quarter of their caseload each month (approximately 45 cases) in order to have all cases redetermined every four months. The union, on the other hand, has encouraged a maximum reponsibility of 30 cases per month, but with little support from members.

Thus, it appears that the recent changes in the worker's job and title have had a psychological impact on the workers themselves. A few workers added that the change has been particularly hard because it was done with great secrecy. From the time the issue of title change first arose in March 1979 until its announcement in September 1979, workers received no information about the change. Consequently, a great deal of the worker's time, energy, and worry in the local office was spent

discussing rumors and speculating with co-workers on what the outcome might be.

6.7 Responding to the Conflict

It is possible that the conflict of role expectations and the ambiguity of the roles themselves may cause dissonance within the worker. As with any individual, the worker could react to the stress by developing defensive mechanisms. In some roles the agency itself will establish the defense mechanisms such as standardization, categorization, and routines for reinforcing the worker's role. However, there are several ways in which the individual can also go about protecting himself from the uncertainty of the job. Unfortunately, each of these ways appears to further distort the perceived reality of the worker and generates less than desireable performance. First, he may withdraw from or avoid those he feels cause the conflict. Lawler (1973) cites the attempt by the person to reduce communication with his co-workers and the belief that co-workers lack power over him as symptomatic of this defense. Kahn (1964) found that under situations of high conflict workers attribute very low power to those who set role definitions and they decrease their confidence in the agency.

A second mechanism for dealing with role conflict is to modify the various expectations of performance. This may involve influencing

reference groups with certain claims about the role, seeking changes in the programmed component of the role, or modifying the individual's image of himself. Furthermore, the worker may simply disclaim any responsibility at all for the results of his work with the client. Instead, he claims that the client is responsible for his own actions, or they say that the client is too far gone to really be helped. Rejecting responsibility for the client, and therefore for the worker's own acts is particularly common where no system of evaluation-rewards of satisfaction to the worker needs. The workers can be very narrow or selective in his performance, then, in order that they accomplish the programmed part of their role with the minimum of stress. Teachers, for example, may feel that they cannot teach all the students so they will focus on only the brighter children.

Yet another way of coping is to make certain assumptions about the client which predefine him and fit a set of expectations and thereby justify the treatment provided. Argyris and Schon (1974) describe what they call "theories of action", theories which we attribute to other people to explain or predict their behavior. Workers develop various informal theories, i.e., stereotypes about their clients which they never take the time or opportunity to test for validity. Since the workers tends to reduce uncertainty by simplifying categories and routines, the stereotype is a shorthand way of making decisions about behavior toward the client. Workers, for example, may take very different attitudes toward clients depending upon the person's physical appearance or

mannerisms. Two developments which serve to reinforce the attribution of behavior to clients are : accepting partial empirical validation or accepting illustrative validation of that stereotype. In the first case, the worker will pay only selective attention to information, usually neglecting to put that information in the proper perspective. In the second, the worker will look for particular examples which "prove" the legitimacy of the stereotype.

Because of the "self-sealing" nature of the theories attributed to clients, the worker fails to see the impact of his own behavior in contributing to the problem. Thus, the undesirable behavior is never modified and the ineffective worker becomes even more ineffective. Argyris and Schon (1974) use the recollections of one social worker to illustrate this point:

> I feel annoyed with him (the client) and pretty determined either to cut off our interaction, delve more deeply into his problem, or demonstrate to him that he is in fact not interested in changing at all. The last alternative is fine with me. I dislike wasting my time on futile activity (p. 53).

While the worker may espouse the values of wanting to help the client become more self sufficient, her attitude reflects her need to control the environment and the client. She has

> attributed characteristics to him without telling him so he can confirm or deny them; has decided that the responsibility for failure lies with the client and therefore does not explore her possible role in the apparent failure or assume she is responsible for the client's behavior (p. 53).

Thus, the worker deviates from the standard program requirements and criteria in an effort to cope with the frustrations of their own self-image and conflicting expectations.

In summary, the normative rules influencing worker behavior and policy implementation can be as strong as the mandatory and permissive rules established by the agency. The clash between requirements imposed by agency rules, e.g., that the worker must verify each piece of information, and the requirements imposed by the worker's self-image or peer group, e.g., to help the client as quickly as possible, creates a role conflict that must be resolved by each worker. For some workers, the normative rules will be stronger; for other workers, the mandatory and permissive rules will be stronger. Ideally, policy makers should recognize these external rules that are placed on workers and remove -- rather than create -- the role conflicts. In the remaining two chapters I will suggest a model which gives greater recognition to the normative rules.

Chapter 7

THE DYNAMICS OF RULE IMPLEMENTATION

In Chapters 4 and 5 I identified several mandatory and permissive rules which represented agency policies and which were intended to control worker and client behavior. For each rule I traced the implementation process from intent, through the observed worker behavior under that rule, to the probable impact on client handling or case processing. At each step in the implementation process I examined those factors identified by workers as influencing how they interpreted and acted upon those rules. In Chapter 6 I then explored the influence of normative rules on worker behavior and the conflict that arises between agency and outside requirements.

7.1 General Patterns of Implementation

Several interesting patterns emerge when we look at worker behavior across the three types of rules. First, worker behavior under each rule was not uniform. In spite of the random assignment of clients to

workers, workers showed marked differences in the aggregate measures of client processing. Some workers, for example, completed case processing twice as fast as others; and some workers tended to approve many more clients for assistance. Second, the different worker behaviors and client impacts shows that each worker implemented the formal rule differently from her co-workers. In some instances workers interpreted rules in favor of reducing their own workload at the expense of client treatment or program accuracy. In other instances workers interpreted the rules to be as fair and as responsive to clients as possible. Thus, there are, in reality, multiple versions of the original rule being implemented. When implementing a rule, worker A's variation becomes the rule for client A and worker B's variation becomes the rule for client B.

Third, the implementation of one rule appears to have unanticipated consequences for the implementation of other rules. For example, the agency defined role of the worker influenced the amount of time devoted to client interviewing. Similarly, rule implementation appears to have unanticitpated consequences for other aspects of the agency operation or client treatment. The implementation of a worker dress code, for example, ultimately consumes extra time and agency resources because workers would go home to change clothes before doing a home visit. To the extent that the agency monitors these unintended outcomes and takes corrective action, further new policies and rules are introduced into the work environment.

Fourth, in almost all cases the workers reported that factors

beyond the simple internal structure of the office were influencing their

behavior. These factors ranged from constant interruptions to hostile

clients and may have been real or perceived in their environment, but the

workers appeared to take these factors seriously when executing agency

rules. Thus, the implementation process appears to be much more complex

than suggested in the simple wording of a rule or policy.

7.2 The Four Models Revisited

In this chapter I will examine the usefulness of the four

alternative perspectives on individual behavior presented in Chapter 1

and will synthesize a fifth model which more closely matches the behavior

observed in the previous chapters. All four of the earlier "models"

provided important insight into the worker data presented in chapters 4,

5, and 6, but none of the four alone was able to fully explain the

individual's implementation process. By combining certain aspects of the

four perspectives, it is possible to develop a more powerful model for

understanding the dynamics of the welfare office and for understanding

worker behavior. There will be two parts to the following discussion.

In the first part I will summarize the strengths and weaknesses of each

of the four models as they appeared in the first chapter. The second

part then prepares an integration of the four perspectives that takes

into account individual behavior within the bureaucratic organization as

well as the implementation process. In the next chapter, I will discuss the implications of the revised model for policy formulation and suggest some guidelines for anticipating rule impacts prior to the actual implementation of the rule.

7.2.1 Lipsky's Scarce Resources Model

Lipsky's model of the "street-level bureaucrat" appears to have both strengths and weaknesses in explaining individual behavior in implementing program policies. First, the model recognizes that program policy is implemented by specific individuals rather than whole organizations. Second, and perhaps more important, the model argues that policy is really made at the street-level rather than by policy makers at the top of the organization. What actions the front-line worker takes in serving the client become the agency policy for that client regardless of the original intent or instructions from the rational policy process. We saw several instances in Chapters 4, 5 and 6 where workers interpreted agency policy to fit actual working conditions rather than necessarily following the original intent of the policy.

Third, we observed that workers displayed definite "coping behavior" in response to the scarcity of resources. The notion of workers "coping" in delivering services to clients is useful because it formally recognizes that the situation faced by the worker is neither the ideal nor the one envisioned by the original policy makers. Workers faced a scarcity of time, work space, privacy, travel resources, and even

personal security in carrying out their responsibilities. The common scarcities appeared to induce certain common responses among workers, including the stereotyping of clients and selective attention to client's problems.

In contrast to these definite strengths, Lipsky's model was much less helpful in four other areas. First, the model addressed the individual implementing policy for the organization but did not address what the implications of the worker's actions were for the organization. We saw from the data that worker interpretation of rules can affect office operations as well as the allocation of resources. These changes in turn affect other workers. Thus, Lipsky's model addressed only one direction of a two way interaction. Second, the model presented a static view of the implementation process, showing only isolated events and actions. Implementation is actually a dynamic process, with one rule decision affecting subsequent decisions, actions on one case overlapping actions on other cases, and changes in agency policy to correct for earlier rule dysfunctions.

Third, the model assumes a certain uniformity among workers in their responses to scarce resources or hostile situations. The street-level bureaucrats' "coping behavior" is presented as a generalized behavior to a particular set of conditions. Yet in the observed data, workers varied considerably in their responses to the same situation. People will do what is necessary to get a job done, but will likely take different approaches in so doing. Different workers behaved differently

when confronting the same rule and individual workers exhibited consistant behavior across rules. Furthermore, workers displayed certain types of coping behavior not even predicted by the model. This variation among individuals is critical to understanding the implementation process and client treatment.

Fourth, Lipsky treats the various coping strategies as separate behaviors. I would expect that any one part of a worker's behavior is interrelated to other behavior and that an individual's reaction to a hostile client would affect his reaction to the office's security policies. The alternative implementation model described below will emphasize much more heavily the interrelatedness of rules and behavior.

7.2.2 Blau's Structural-Functionalist Model

How helpful was Blau's model, then, in explaining the behavior observed in Chapters 3 and 4? At least four aspects of the model were applicable. First, the notion of organization dynamics surfaced in my examination of the several rules. Changes in the agency and program generated problems, which in turn generated more changes. Worker behavior and program outcomes can be best understood from a dynamic rather than static analysis. Second, Blau's model identified adaptations on the part of the organizational members as the primary change mechanisms. When office management perceived that behavior had gone outside acceptable boundaries, new policies were generated to retore the system. The same behavior was shown in the Massplace office. Third,

Blau at least partially addressed the issue of policy implementation and rule obedience. The model showed that worker interpretations of rules lead to instances where the actual policy being carried out was different than that intended by the policy makers. Fourth, Blau predicted that his organizational and group factors would be important in the welfare office, and those factors did emerge from the observed and reported data.

Blau's model, however, proved much less helpful in several other ways. First, Blau assumed that the agency policy itself was useable as stated, i.e., that there were no deficiencies in the policy's wording, timing, or training. But welfare workers reported that frequently the policy/rule itself is the source of the problem; problems in implementation existed prior to the policy's reception by the worker. Second, Blau analyzed organizations in which workers function almost entirely within the boundaries of the organization. Naturally, the factors influential there existed internally as well. But welfare ofices are "boundary spanning" organizations where workers function largely outside the of direct agency supervision and often outside the physical boundaries of the office as well. Workers identified critical factors that influenced their behavior from the outside environment; structure was considered just one of several groups of factors.

Third, Blau treats the group as the producer unit and attempts to explain the behavior of the organization based on the group behavior. Yet in both organizations -- and especially in the Massplace office --

the real producer unit is the individual worker. Cases and clients are

processed by individual workers rather than by teams. Thus, program

output becomes a function of aggregate individual behavior instead of

group behavior. The individual actor introduced other important factors

into the analysis requiring a more complex model. Fourth, and perhaps

most important, Blau's model identified adaptations as being the source

of problems for the agency. From the worker's perspective, however, the

policy is the source of the problem and the adaptive behavior is a

solution to that problem. Workers reported that they tried to keep

program outcomes within acceptable ranges in spite of conflicting

environmental factors, thereby keeping the system functioning. This

notion of adaptive behavior as a solution rather than a source of

problems suggests that some important modifications are needed to Blau's

model.

7.2.3 Goffman's Image Management Model

Goffman's social-psychological model provided a useful contrast to

the previous two models because Goffman looked inside the individual for

the factors which influence behavior. Although this model was not

intended to address issues of program policy or implementation, the model

does address the response of individuals to the rules of institutions and

service providers' attempts to control the clients they "serve". The

primary factor determining the individual's behavior, then, is the image

which the person has of himself and which he or she wishes to project to

the world. Organization rules and other environmental factors are filtered through this self-image, and the person responds accordingly to project or protect that desired image.

Goffman's model does not expect to find uniform behavior among people in the same situation. Differences in life experiences, personal philosophies, and emotional composition all lead to very different self-images. The only uniformity among people will be attempt to control the image and the interaction with others. We saw that intake workers differed markedly in the images they had of themselves and the clients they served. Some workers perceived of themselves as professional counselors, others as clerks. Some workers perceived of themselves as compassionate human beings, others perceived of themselves as irate taxpayers. To the extent that workers have similar training (socializing), on-the-job, or client experiences we would expect to find similarities in behavior and policy implementation. However, the fact that workers spend more time outside the influence of the agency than inside suggests that there would be more differences than similarities in behavior. The agency uses formal mechanisms such as job descriptions, training, quotas, close supervision, and procedure manuals to invoke the minimum acceptable level of uniformity in behavior. The worker in turn uses these mechanisms to control the interaction with the client and to maintain the desired image.

7.2.4 Skolnick's Personality Model

The strengths and weaknesses of Skolnick's model for this analysis are similar to those described above for Lipsky's model. First, the model's main contribution comes in arguing that the elements of the job itself can provoke a general attitude about work and the client. This attitude, or "working personality", determines the daily behavior of the worker and the type of interactions with the client. The data in Chapters 3 and 4 showed that intake workers do develop a "working personality" with regard to certain aspects of their job, e.g., soliciting and verifying information during the intake interview. Second, the same job elements which generate the working personality also require the worker to develop his or her own program policies. Time demands, community expectations, or physical threats lead the worker to implement self-developed policies for dealing with the immediate situation. Third, the job elements of danger, authority, and apparent efficiency which Skolnick identifies as being critical for the policeman's working personality were also present to a lesser degree in the welfare worker's job

There are, however, at least four weaknesses in Skolnick's model which partially offset its usefulness for our analysis. First, the model treats worker behavior as a social phenomenon rather than as an issue of policy implementation. Consequently, the model says little about the implications of the working personality for implementation or for the organization itself. Second, Skolnick assumes that the existence of a "personality" results in a certain uniformity in behavior among service

providers in the same agency. Yet our observed data shows significant variation in both the personalities of the workers and their daily behavior on the job. Third, the model identified only a handful of factors which influence worker behavior. The present analysis supported the few factors Skolnick cited and identified several other equally important factors, suggesting that worker behavior is even more complex than described by Skolnick. Fourth, Skolnick's model, like Lipsky's, is a static perspective that ignores important dynamic interaction.


7.3 An Alternative Model of Implementation

Among the four models examined in this study, Blau's dynamic model appears to be the most useful for understanding individual implementation of AFDC policy. Although the basic elements of Blau's model, i.e., policy, adaptations, and problems, fit the observed data, the shortcomings discussed earlier indicate that an improved, alternative model would be even more useful. For example, the evidence from Chapters 4 and 5 suggests that Blau's treatment of policy as a source of problems and adaptations as a solution be reversed. Weaknesses in the policy or rule are an important source of problems; workers make compensations in their interpretations of the rules in order to make the policy work in the actual context of the agency. In schematic form, the alternative model would look like the following:

```
                    policy
              /            ↖
             ↙               \
      problems  ─────────────→ adaptations
```
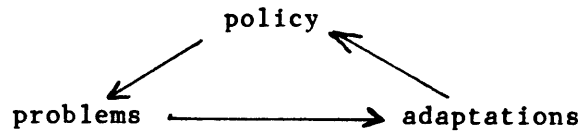
Let us examine this model step by step.

The starting point of the model is the same as for Blau's model,
i.e., with policies expressed as rules, resource allocations, roles,
etc. The rules are presented to the worker in the form of either written
announcements, manual supplements, or verbal instructions from the
supervisor. The worker examines the rule to determine what changes must
be made in her work. If the rule is clear, understandable, and not in
apparent conflict with other requirements made of the worker, the worker
proceeds with the required activities. If, however, the rule is unclear,
unreadable, or otherwise confusing, the worker immediately confronts an
implementation problem. Thus, the first leg of the new model can be
expressed as:

```
                    policy
                  /
                 ↙
        problems
```
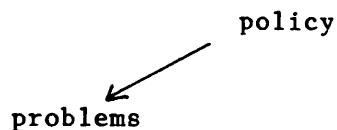
But the worker's analysis of the new rule is not done in a vacuum; rather, the worker interprets the rule in light of her understanding of the welfare system, the office, past experiences, perceptions of herself and others, and the available resources. Thus, the worker is placing an abstract rule into a real world context (as she perceives that real world). The worker's knowledge of the program setting may immediately yield information on additional problems caused by the policy. Such problems may range from a conflict with an already existing rule to a moral objection to the action required. Structure, as used by Blau, becomes simply one part of the program setting. Thus, the second leg of the model can be expressed as:

environment   policy
          \   /
           \   /
          problem
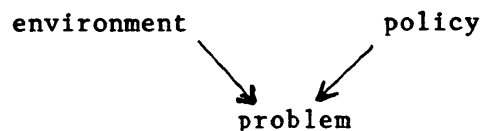
If the worker perceives there is no problem in implementing the new rule, then the worker will follow the instructions of the rule as the situation arises. If, however, the worker perceives that there will be a problem, she will exercise one of two types of adaptive behavior. First, the worker will simply ignore the requirements of the rule and continue to behave in the manner prior to knowledge of the rule. Second, the worker will change her behavior to meet both the requirements of the

environment and some interpretation of the rule. The planning of an implementation strategy can be considered to be part of the adaptation behavior rather than the problem definition step. Thus, the third leg of the model is:

$$\text{environment} \searrow \quad \swarrow \text{policy}$$
$$\text{problems} \longrightarrow \text{adaptations}$$
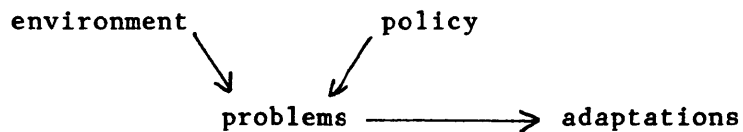
It is important to note that because it is the individual worker who analyzes the rule and develops her own strategy for implementation, each worker could produce a different adaptation for the same rule. It is the element of individual interpretation and response that makes the behavior of the organization much more complex than that assumed by Blau. It should also be noted that in this discussion I am treating the role of the worker's supervisor as simply another factor in the environment. Although the supervisor's function is to foster correct and uniform implementation of the rules, the influence of supervisors varies considerably from worker to worker.

Once the worker has developed her adaptive strategy, that strategy determines the actual treatment of the client or the processing of the case. Regardless of the wording or intent of the agency rule, the policy

as defined by the worker becomes the de facto agency policy until the agency acts to intervene. The agency is capable of monitoring the system and workers at particular points during case processing and determining whether the de facto policy is within acceptable limits of the original policy. If the behavior is outside of acceptable limits, then the agency may develop new policies to correct or prevent the questioned behavior. The new agency policy then starts the cycle all over, and the final leg of the model looks like:

environment   policy

problems ————————> adaptations
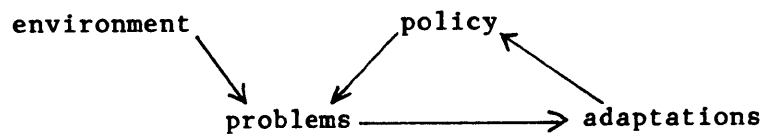
Again, note that having the individual as the producer unit means that each adaptation can result in a slightly different policy and each de facto policy can result in a different revised policy by the agency. Thus, the "N" number of adaptations can result in "N" number of de facto policies, each of which is different from the original agency policy. The alternative model represents this diverging feature in the following way:

environment   policy

policy$_N$

problems ————————> adaptations$_N$
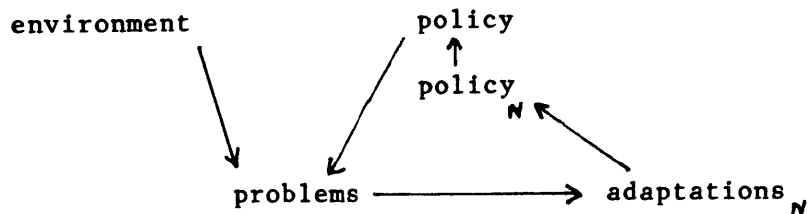
In summary then, the research presented in Chapters 2 through 5 has shown that the implementation of policy in social services such as welfare is dependent upon the behavior of the individual service provider. Earlier models of individual provider behavior have posed behavior as a function of either the characteristics of the type of work, the structure of the agency, the scarcity of resources, or individual concerns with image. Of the four models considered herer, all except Goffman assumed that behavior on the part of the worker was uniform across individuals and all except Blau took a static view of that behavior. The present study shows that behavior in policy implementation, in fact, varies across both individual workers and types of rules. The determinants of individual behavior are not just those cited by each of the four models, but also those factors interacting with one another. It is this interaction and the complexity of the service delivery environment that have serious implications for the design of public policy and the design of the mechanisms to implement that policy. In the next chapter I shall discuss some of these implications.

Chapter 8

IMPLICATIONS FOR PROGRAM POLICY AND IMPLEMENTATION

This study has taken a rather lengthy journey into the world of the welfare "street-level bureaucrat" in order to better understand how the individual worker implements program policy. I also discussed the role of the worker in the AFDC program, the need for and sources of discretion in the job, examples of the way discretion gets used, and the pressures from the client, agency, peers, and the community that are influential on the worker.

The findings presented in Chapter 7 suggest several implications for both policy making in the welfare program and the management of the local welfare office. First, policy makers should give greater consideration to the "real world" context of the program when formulating new rules and regulations. Second, policy makers should try to anticipate what the positive and negative consequences of the policy would be, especially secondary impacts which may be outside the program objective. Third, policy makers should give front-line workers more, rather than less, discretion in implementing program policy. Fourth, the efforts at reforming the welfare system should be focused more closely at

removing the existing obstacles to program operation than to major
overhauls in the assistance payments formula or eligibility standards.

8.1 Think About the Program Environment

One changed implied by my alternative model is that policy makers
give as much attention to environmental or contextual factors as they do
to the policy controlable factors for directing behavior. Chapters 4, 5,
and 6 identified several of the key environmental factors affecting
behavior of workers; a list of such factors can be kept in mind as new
rules and regulations are drafted. Even cursory examination of how
environmental factors can conflict with policy may show inherent
weaknesses in the drafting or operation of welfare rules.

The list of factors to be considered in formulating welfare policy
at the case level is longer than that summarized by the model. Rather
than encumber the model with a long list of specifics, I suggest that a
few general categories of factors to serve as reminders to policy
makers. For each of the following groups of factors, the policy maker
should ask "What will be the probable influence on the basic producer
unit, i.e. the individual worker?"

> Agency/Organizational Factors (policy controllable)
> - existing mandatory and permissive rules
> - resource allocations
> - role definitions

- performance standards
- structure
- office location and setting

Environmental Factors (non-policy controllable)
- client characteristics
- community standards of behavior
- community expectations of the agency
- other laws
- community resources

Simply, worker behavior is a function of the rule, agency factors, and environmental factors. Each specific factor or group of factors directly interacts with the rule to determine worker behavior. The resulting worker strategy and de facto agency policy is then the aggregation and interaction of these individual influences.

8.2 Anticipate the Consequences

The alternative model also suggests that policy makers anticipate the most likely adaptations that workers will make by examining the requirements of the rules as they would be "filtered" through the environmental context. The data presented earlier indicates that the various individual factors interact with one another as well as with the rule itself. Since the producer unit is the single intake worker, the interaction of factors occurs in the mind of the worker as new rules are analyzed. The worker combines her understanding of the agency, the program, the community, and the client with her interpretation of the

rule. The assessment across the dimensions is done simultaneously and

yields an outcome in the form of a strategy for action. Thus, policy

makers should also anticipate how the worker makes adaptations in light

of her perceptions of the different actors involved, specifically:

Worker perceptions of
- self (including demographics)
- client (including demographics)
- peers
- agency
- community

Simply, worker behavior is also a function of the worker's perceptions of

the various parts of his world. For example, how a worker perceives of a

client in light of one rule can affect how the worker perceives of the

resources allocated to that client.

If worker behavior is then a function of both the contextual

factors and worker perceptions of those factors, then several key

relationships can be summarized in a single table. Contextual factors

form one dimension of the table while perceptual factors form the second

dimensions. As shown in Exhibit 7-1, the intersections of the two

dimensions are the points at which worker behavior is determined. For

example, a rule may be introduced to further reduce client fraud by

asking for additional verifications. The rule is examined by the worker

in light of the existing demand for documentation and the worker's own

standards for fairness. The worker concludes that the rule conflicts

with the current demands on the client and is therefore unfair. The

Exhibit 7-1

REFERENCE TABLE FOR POLICY TESTING

Agency (Policy Controlable) Factors: Environmental Factors:

Worker Perceptions:	Rules	Resources	Roles	Standards	Structure	Setting	Standards	Laws	Resources
Self	o	o	o	o	o	o	o	o	o
Client	X	o	o	o	o	o	o	o	o
Peers	o	o	o	o	o	o	o	o	o
Agency	X	X	o	o	o	o	o	o	o
Community	o	o	o	o	o	o	o	o	o
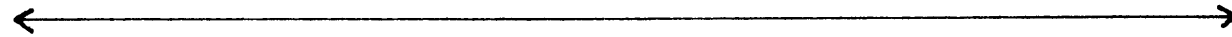
worker then feels that the agency is becoming unreasonable in its demands (linkage 1) and that clients should somehow be compensated for that additional hardship (linkage 2). The worker may choose to increase the client's grant in some way or to provide more time in counseling. In either situation, more agency resources are consumed than would be without the rule change. Thus, the de facto policy becomes one that demands greater verifications from clients but which also compensates clients for their time.

The matrix in Exhibit 7-1 provides a device for linking the various factors which appear to influence individual behavior. Using the table as a guide, policy makers can trace out possible worker behavior for any rule, resource decsion, etc. Interventions or changes at any one particular point on the matrix trigger reactions down the column by related agency or environmental factors and across the row by related perceptions. The analysis in Chapters 4, 5, and 6 identified a handful of the key factors and their accompanying interrelationships. It is now possible to predict what the likely worker behavior will be for a rule change affecting these new factors. What remains to be done, in a future research effort, is to establish clear causal relationships and parameters for the matrix.

8.3 Give Workers More Discretion

As noted in Chapter 1, it would be virtually impossible to eliminate all the discretion from the worker's job. The constantly changing nature of agency rules, the complex program regulations already in existence, the great diversity of client situations, and the need for human interaction all make worker discretion necessary. Welfare agencies will never be able to circumscribe all of the possible client conditions into set categories, nor could they decipher underlying client problems and to deal with the ambiguous information generated by all aspects of the system.

Furthermore, it may not be desireable from either the agency's or the worker's interest to further reduce the discretion of front-line workers. The gains made in standardizing client treatment and worker productivity can be more than offset by the apathy and frustration of the workers. As discretion is removed from the job, workers tend to feel demeaned; they, in turn, begin to show a distrust of the agency. Agencies have had a history of deflating the worker's job and substituting a preoccupation with production numbers for concern over quality and satisfaction. Worker's feel "if the agency doesn't care about quality, why should I? I'll just do the job the fastest and easiest way I can."

This type of attitude suggests another important implication: the worker has to have some flexibility to adjust to the system. Welfare workers develop a wide range of coping behaviors to deal with the demands of the agency, the job tasks, the client and themselves. Rules are

obeyed in form but not spirit, techniques are invented to minimize

paperwork or expedite policy clarifications, and stereotypes or other

subjective judgements are used to screen out/screen in particular types

of clients. There appears to be large discrepancies between the way the

welfare system should operate (according to policy) and the way it does

operate (according to workers' actions). Any attempt at reducing

discretion to eliminate the unfairness of the system has the potential

consequence of eliminating one or more of the coping strategies that keep

the welfare system in operation. In judging worker behavior, we should

not loose sight of the fact that such short cuts and relief valves are

what enables the agency to survive the complexity and pressures of the

larger system. Thus, attention should be focused not on the limits to

discretion, but on other aspects of the program or bureaucracy that cause

discretion to be channeled in one direction or another.

The findings also indicate that the attempt on the part of the

worker to use adaptations for implementing abstract rules under real

world conditions may be an action to be encouraged rather than

discouraged. In Chapter 1 I noted that the purpose of the rules is to

control worker behavior in the accomplishment of organization

objectives. Organizations have traditionally attempted to make

operations more efficient or effective by eliminating discretion from the

worker's job. But discretion appears to provide the necessary slack in

the policy implementation process to make rules work under non-ideal

conditions. Agencies could very well accomplish their objectives by

introducing more rather than less discretion into the worker's job.

In the state of Washington, for example, the Department of Social and Human Services (DSHS) has developed the concept of the "prudent person" and has tried to impress this concept upon the workers undergoing training. Department trainers try to get the worker to apply reason and common sense in any discretionary situation that should arise. Exhibit 7-2 presents a page from the training manual summarizing the DSHS concept and the suggested behavior of the worker. In applying the "prudent person concept" workers are instructed that:

> the worker is required to make reasonable decisions based on experience, available facts and knowledge of the program... Applying Prudent Person Concept means applying common sense. (DSHS FST Handbook, August 1978)

The DSHS has decided to formally recognize the department's inability to set clear guidelines for every situation and the importance of worker discretion. The findings of this suggest that welfare department go further in this direction and enhance the amount of discretion. Naturally, new rules would still be needed because of changing program emphases and court actions, but the system could call upon the workers to exercise more professional judgement.

8.4 Focus Reform Efforts at Existing Obstacles

Most of the discussion and debate surrounding the topic of welfare

Exhibit 7-2

THE "PRUDENT PERSON" CONCEPT

Definition

Prudence is defined in Webster's New Collegiate Dictionary as "The ability to govern and discipline oneself by the use of reason; caution or circumspection as to danger or risk;" (to be) prudent is defined as "(being) marked by wisdom or judiciousness."

Synonyms of the word prudent additionally define its meaning, such as "careful," "cautious," "discrete," and "having foresight." In plain language prudence is simply applying reason and common sense to a given situation.

Application

When a worker is asked to apply the Prudent Person Concept, that worker is required to make a reasonable decision based on experience, available facts and knowledge of the program. This method is used to determine the validity of case situations or client statements.

Documentation

Whenever the Prudent Person Concept is applied the decision and how it was arrived at should be written in the narrative or intake summary. It is essential to have this information in the case record because it creates an audit trail; anyone reading the case will understand why the decision was made and what facts were available in making the decision.

Summary

Applying the Prudent Person Concept means applying common sense. It requires being able to identify inconsistent statement or situations, clarifying them, and documenting the problem, decision, and what facts the decision was based on....

In applying Prudent Person Concept the worker asks himself: "Is this a reasonable statement? Are the facts consistent? Does the situation make sense?" The worker then makes a judgement. The entire process is a serious responsibility and one that must be treated accordingly.

---

reform is focused on instituting sweeping changes in income policy, restructuring assistance packages, or reorganizing welfare agencies. The issues that are explored and evaluated tend to be on the macro-level. In contrast to this national policy and state policy orientation is the growing preoccupation with micro-management studies that are taking place within virtually every public service agency. These studies are initiated in hopes that by setting very precise productivity standards, processing deadlines, and unit scheduling, agencies can somehow improve the quality of the services they are providing. Many initiatives at this level have failed because they failed to understand the complex relationships underlying service agency operation.

My investigation into the world of the welfare worker leads me to believe that there is a fundemental concept of organizations that must be remembered whenever change or reform is attempted: the system is composed primarily of human beings who are actively involved in serving or treating other human beings. Any effort at reform must recognize the objectives and motivations of the individuals comprising the agency. New polices can be promulgated and new agency structures implemented but the net effect of these changes depends largely on the front-line worker who translates policy into reality through his actions. If we start discussing change, therefore, from the point of the individual service provider rather than agency objectives, we will remove one of the biggest stumbling blocks in any public service system.

The message that came through very clearly from the welfare workers

interviewed was that policy makers should stop paying so much attention to major reform and start paying more attention to the multitude of administrative obstacles that prevent the system from functioning the way it is already designed. In general, workers are a conscientious group of people who care both about what happens to the client and what happens to themselves. But they felt that policy makers were deliberately making their job harder by passing down unintelligible, conflicting, and illogical policies while not passing down wage increases for jobs well done and recognition for the myriad tasks never mentioned in their formal job descriptions. Workers all agreed that modifications and reforms were needed, but at a level rarely discussed outside the units themselves.

The problems and issues in need of attention coincide with those identified in this study. First, there needs to be a clear definition of the welfare worker's role in the state agency and in the execution of program policy. Standardized job descriptions that are devoid of any real direction and minimal amounts of training only serve to confuse the worker as to the expectations of the job, the department, and the proper relationship with the client. Furthermore, the recent job deflation of the welfare worker has taken a severe toll in morale, dedication, and self-esteem. To be trained as a social worker, to retain the title of social worker, to have a caseload of clients, to do home visites and limited counseling, to help people in crisis situations, and then suddenly be stripped of the title and prestige is perhaps the hardest change that the agency ever dealt the worker.

It is important for policy makers and top agency officials to cease sending their front-line workers conflicting signals. On the one hand workers are told that their job is not terribly difficult and so the state is decreasing the entrance requirements, starting pay, and job diversity. Yet on the other hand, the state is increasing the number of regulations, the complexity of the regulations, the size of the caseloads, and the amount of work handled through special projects. A similar conflict occurs with respect to accountability. On the one hand workers are held strictly liable for any errors made in determining eligibility and/or the enforcement of rules and regulations. Yet on the other hand, the worker is at the mercy of the client for all verification of information; state rules prohibit the worker from independent verifications or pursuit of suspicious cases. It is conflicts such as these that cause workers to experience severe frustrations with the system and to react with short cuts, rule deviation, or just plain apathy.

Second, there needs to be clear recognition of the emotional and physical stress that the job places on the worker and mechanisms implemented to channel or mitigate that stress. Continual interruptions take their toll in both lower productivity and loss of concentration. Constant dealings in crisis situations, lack of cooperation from other service agencies, and growing client demands take their toll in attentiveness, empathy, and courtesy. Simple management practices such as regulating calling hours for clients (as in the Massplace office) or

weekly 3 hour blocks of uninterrupted time (as in Washington) can provide the respite necessary for handling the heavy demands of the job.

Similarly, the potential for physical violence in both the office and on the way to home visits needs to be addressed. Federal and state regulations mandating home visits do not take into account the dangers of female workers visiting single male clients. Virtually no protection is offered to workers going into high crime or racially violent neighborhoods. Thus, workers risk being sanctioned for not following the regulations when to do so would pose a direct physical threat to them. In the office, few precautions are taken (e.g., alarms in the interview rooms) to avoid trouble with hostile or emotionally disturbed clients.

Third, there needs to be a solution to the proliferation and duplication of paperwork. Single page obsolete forms spawn new multiple copy forms and different programs or agencies require identical information only filled out in a slightly different format. The repeated entering of name, address, and social security number on each of the 20 to 30 forms in an interview siphons time away that could otherwise be spent talking with the client. Also, the use of pre-designated lines labeled with items that are actually used to record a totally different piece of data makes workers seriously question the competence of the state agency staff. An effort should be made to consolidate forms as well as to standardize forms across various assistance programs. Many workers devise their own forms or letters to streamline the work process but as yet there is no effort for management to seek out and learn from

its workers.

Fourth, along with the clarification of the worker's role definition and expectations, there needs to be an effective performance evaluation system. Existing evaluation systems appear short circuited by guaranteed pay increases, seniority based promotions, and supervisor discomfort with doing evaluations. Only when workers feel that the evaluation system can make a difference in their career path will they begin to pursue those behaviors rewarded by the agency as ways of promotion.

Accompanying this revamping of the promotional system must be a rethinking of the particular criteria on which workers are to be judged. Currently, the criteria fall at one of two extremes. On the one hand, the worker is evaluated on very general dimensions that have little to do with the quality of her work and which requires a very subjective assessment by the supervisor: How well does the worker follow directions? Use time? How well do they get along with co-workers? A few supervisors have attempted to adjust the evaluation criteria on an informal basis by asking a slightly different set of questions: Are there many complaints from clients? Are there many erors in eligibility determination? Has the person shown initiative in trying to improve the workflow? On the other hand, the worker is evaluated on a very precise measure of a very small number of job tasks. Monthly quotas are set for each worker; "acceptable" work is defined as exactly meeting the quota, unacceptable work is anything else. The work involved in meeting the

quota comprises less than half of the total work done during the week. Current criteria ignore this other, larger portion of the work being done.

Finally, there needs to be a recognition that different types of people are more compatible and do work better together than others. Civil service requirements, affirmative action programs, and the move toward job standardization have forced a situation where workers are perceived as interchangeable parts, each with an identical set of skills and talents. The research cited earlier suggested that we need to do better matching of worker and client so that each is getting what they personally need from the interaction as well as satisfying the overall program requirements. A few offices are making efforts along these lines by assigning Spanish speaking clients to bi-lingual workers. And while this move seems logical strictly from an expediency standpoint, it is my impression that workers who had clients of similar background to themselves were much more satisfied with their work. Of course, to initiate a system of worker-client matching (or deliberate mismatching) requires some understanding of the variables and characteristics that make a difference to the interaction.

Thus, the need is to undertake reform at the "middle level", i.e., not directed at the meta program structures nor lost in the micro-world of time and motion studies. They are changes which policy makers and top administrators can make relatively quickly, albeit with some resistence from the entrenched interest of the workers' union and others. Even

without the more drastic changes, it would be a relatively easy matter for management to recognize individuals doing good work, to keep workers fully informed in the changes and reasons occuring in their job definition and the agency structure, to remove obstacles and conflicting rules, and encourage worker initiatives for improving the welfare system's operations. Policy makers fail to do this now because they, like the workers, become paperbound. Many of the workers interviewed for this study indicated that they are interested in the better operation of the agency, are willing to make improvements, and have some good ideas about reforms. The remaining need, then, is for a mechanism to tap those ideas and energies.

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Appendix A

Interview Guide Used in Interviewing
Local Office AFDC Caseworkers

Interview Guide Used in Interviewing
Local Office AFDC Caseworkers

I. ORGANIZATION AND STAFFING

1. What do you do in the normal day-to-day performance of your
   job? What are the major components of your work and about
   how much time (per day, week, etc.) do you spend on each
   component? About how much time do you spend on the following
   functions (probe at local office): What are your priorities
   in acccmplishing the tasks of your job?
   Probe with:

   intake and application

   case maintenance

   redetermination/special reviews

   fair hearings

   fraud detection

   worker evaluations

   administrative activities (specify)

2. To whom are you responsible? How often do you have contact
   with these person(s)? (Position, title, location) How
   would you characterize your relationship with these people?

3. Who is responsible to you, i.e., whom do you supervise?
   (Position, title, location)

4. Characterize any contact you have with the local office
   director. Frequency? Issues?

5. Do you think the present staffing levels for your agency
   or office are adequate? Why? If not, for what functions
   are more staff needed? Characterize the effect on service
   delivery.

6. Do you or any of the agency staff work overtime? Who
   specifically? Why? Is this a regular occurence? Characterize
   the effect this has on service delivery.

II. Management

    A. Programs

        1. What is your caseload?

        2. What do you consider a manageable caseload per caseworker for each category of aid? (Probe for each category, e.g., AFDC, AFDC-FC, AFDC-FS, MAO-NURSING HOMES, FOOD STAMPS, CS, etc.

        3. How are cases assigned to you? How do you feel about that (e.g., rotation, alpha/numeric)?

        4. Have workload standards been established for your job by your agency?

            a. How and by whom were they developed?

            b. If no, or don't know, by what method is quantity and quality of work insured by your agency? Obtain documentation.

        5. How are errors discovered? Can you describe the process of handling errors? How are errors corrected when discovered?

        6. What use(s) is made of caseworker error information? Probe with:

            staff/supervisor conferences for corrective action

            documentation of training needs

            part of formal worker performance evaluation

            aggregated for local agency and submitted to State upon request

            day-to-day case management

    B. Flow of Policy Info

        1. How often do you confer with your supervisor/director? Per day? Per Week? Per Month?

        2. How many of these conferences have been at:

        your request?

        your supervisors/directors request?

        other (specify)?

3. When confronted with a difficult case or problem you cannot solve, what action do you take?

4. If policy questions cannot be answered at the <u>local</u> agency level, where--above the local level--are questions directed?

5. What is the <u>procedure</u> for requesting answers to policy questions (e.g. written request, notifying supervisor, etc.)? What actually happens?

6. Who in the local agency actually carries out such requests? How is it decided?

    case worker supervisors only?

    local agency director only?

    caseworkers only?

    other?

    combination of above (specify)?

7. How are policy changes <u>from the State</u> communicated to you?... <u>from the County</u>? (Probe for <u>methods</u> of communication.)

8. Are there any formal or informal methods, such as staff conferences meetings, for discussing new policy interpretations or problems? If yes, on what basis? Who attends? How often held? Who handles this?

9. How much discretion is left to you for interpreting policy?

10. What constraints are imposed on you? By whom?

11. Do you have contact or request assistance from state DFCS offices? If yes, which, why, what results?

12. What is the nature of your contact, if any, with the county board? What is the function of the county board?

C. <u>Supervisor's Role</u>

1. What is your role in seeing that program requirements are carried out? (e.g. WIN registration, CSE)

2. What is your role in seeing that deadlines are met (i.e., elapsed time between portions of the application process and elapsed time of total application process)?

3. What is your role in determining how many cases will receive home visits as a part of eligibility determination and verification? What new regulations concerning home visits have you received? What effect has this had on service delivery? staff performance?

   1) When are visits necessary?

   2) When are exceptions made?

4. What is done when a backlog occurs (when there are too many cases for available workers to deal with promptly)?

5. When and why does peak workload occur? During week? During month? During year?

6. What procedures are followed for review of casework supervisor's performance? How often are supervisors evaluted?

D. Clerical Info

1. How does the clerical unit work?

2. How do unit supervisors communicate needs to the clerical unit?

3. What happens to the case file folder if case processing is interrupted (for any reason)?

E. Form Info

1. What forms are used to collect information from clients? (collect)

2. What is the title and description of each form?

3. What is the general purpose of the form?

4. How and from where does worker acquire copies of each form?

5. What files are created from the information on the form or from the form itself?

6. To what extent; is there duplication of information received from to form? What would you change to make form completion more efficient?

F. Resource Allocation

1. What daily problems or decisions do you encounter regarding
materials and non-labor resources (e.g,, supply problems,
methods of acquisition, travel requests, and funds)?

Performance

A. Measurements

1. What performance standards have beendeveloped for this office
or agency by
the State?
the District Office?
the local office?
List the specific standard and cite specific sources. Which
are part of the federal or state QC program?

2. Are there any aspects of agency or office performance you feel
should be measured and reviewed but are not? If yes, list
areas and probe for explanation.

3. What kinds of workload information or other performance data
do you record yourself? How do you record it? What happens
to the information? (e.g., goes to adjust workload if reported
to state, individual evaluation or promotionl (obtain copy if possib

4. What other information (data and source) is used to evaluate
your performance? The evaluation of worker's performance in general

5. How often is your performance officially valuated?

6. Are there interim, informal evaluations as well? Describe.

7. Is feedback on your performance provided in day-to-day communica-
tion with your supevisor?

8. Is there an evaluation of your interaction with other staff
or with the client?

9. On what basis is your work evaluated?

B. Training

1. What formal training have you received during the past 12 months? 24 months?

2. What formal training have you provided for during the past 12 months? 24 months?

   NB: For 1) and 2), list topic, length of session, conducted by, form provided in, and whether it was felt to be useful. Probes for type: e.g., workshops, seminars, group, individual, preservice, inservice, remedial.

3. Who is generally responsible for the training of caseworkers? (e.g., casework supervisors, state DFCS training staff, district staff, other.)

4. Who decides when and what kind of training is necessary for staff members? What factors are considered in this decision?

5. Who do you feel could benefit from further training? (e.g., supervisors, caseworkers, agency director, clerical staff.) What kinds of training would you reccmmend?

6. Does the agency provide stipends for professional conferences, workshops, etc.?

IV. PROCESS

A. Entry

   Outreach

   1. Describe the AFDC outreach program and how it fits in with other outreach programs, especially WIN and Food Stamps.

   2. What is your involvement in outreach.

   3. Characterize the outreach program.

   4. Do you feel outreach is effective? Why or why not?

Client Entry into Agency

1. In what ways do clients first contact the office? Rank according to frequency. Probe for:

Mail

Telephone

Walk-in

Proxy

Internal referral

External agency referral

External non-agency referral

Reception

1. Who briefs the client on the forthcoming process? When? How? Describe the process.

B. Intake

1. Initial (or Pre-Initial)/Second (or Intake) Interview

1. Where does the first interview take place? Do you feel it is adequate in terms of privacy, noise level, comfort, etc.?

2. What information is collected at this stage? What forms completed? Who completes them? What happens to them? What decisions are made? By whom?

3. How is the process described to the applicant? Characterize a typical interaction with an applicant.

4. Does the worker take notes at this stage? Do they become part of the case record? May an applicant review his/her case record?

5. Describe the form completion process. What does the worker complete? The applicant? Is the form(s) explained to the applicant? What if certain information is not available?

6. Is consideration of an application dependent on participation in other programs (e.g., WIN, CSE)? To what extent? What

happens if applicant refuses to cooperate?

7. Is any action taken to ensure applicant understands his/her responsibilities and what the next steps are? Are there guidelines on the subject? What?

8. Does applicant receive any counseling? Under what circumstances? who decides whether the applicant should receive counseling?

9. What happens after the initial interview? Describe in detail; go back to beginning of this section

Referrals to Other Programs/Services

1. Describe the interface AFDC has with other programs/services. Be sure to include:

    WIN

    Child Support

    Food Stamps

    Medicaid

    Probe for tensions between AFDC and these programs vis-a-vis office and worker functions. Cover:

    How contact is made, by whom

    Procedures followed

    Determination process

    Personnel involved

    Data required

    Percent referred

    AFDC worker involvement in other program/service, e.g., in completing forms, making contacts, obtaining information, keeping records if client is AFDC or non-AFDC eligible

    Time Sampling System

    Follow-up

    (Find out if there are other important interfaces)

2. Are external referrals made? What kinds? Describe.

3. Are other services (e.g., adult/child protective services) available through this office? What are they? What is your involvement in them?

Post-Interview Processing

1. Describe the work flow once the applicant has: left the interview.

2. What happens to each form completed or begun during the interview? Where are forms "in progress" kept? (Observe) Who gets copies? How are they transmitted?

3. What does the applicant do at this stage?

4. If the applicant needed/wanted to contact the agency, how does he/she do it? To whom would he/she speak?

C. Case Workup

Verification and Documentation

1. What verification/documentation tasks are performed? By whom? At what points? What degree of discretion is there in the amount of verification performed?

2. What guidelines are there concerning verification/documentation?

3. What are the consequences of lack of verification/documentation? How is the applicant affected?

D. Eligibility and Grant Amount Determination

1. What forms/worksheets are used to determine eligibility and grant amount (collect worksheets/forms) Who does each?

2. What factors go into determining eligibility? Who makes the decision on eligibility?

3. What factors go into computing the grant amount? When is the grant amount finalized? By whom? Is the grant amount adequate for most clients?

4. Describe the procedures and guidelines on making initial home visits? Why and by whom are these home visits waived?

5. What information is collected during the initial home visits?

E. Case Approval/Denial

1. What happens once a case has been approved? Denied? Who makes the approval/denial? Where is the case fiie stored? (Observe) Do some forms get sent elsewhere? Where? Why?

2. Who, if anyone reviews a case for approval/denial? How often? How thoroughly?

3. Once an application has been locally approved, is it ever questioned or reviewed at a higher level? How often? For what reasons?

4. Is help ever sought at higher levels for making approval/denial decisions? Under what circumstances? From whom? How often does this happen? What are reasons for denial other than excessive income?

F. Case Maintenance

Payment

1. How is the payment initiated? How often made? How confirmed? At which point in the process? On the average, how long between notification of approval and check receipt?

2. Is there ever any exception to the normal payment prpcess? For example, in case of emergency, what would happen? Would there be any other means of obtaining assistance for an applicant?

3. What kinds of assistance might be available for an emergency case?

4. What procedures are followed in case a payment; is reported not received or is lost?

5. What is the incidence of lost/stolen/unreceived checks? Are clients compensated for loss/theft? Is there an investigation procedure? Describe.

Special Reviews

1. Describe a special review.

2. What are the guidelines concerning special reviews?

3. What sorts of items trigger special review processes?

4. For what reasons are special reviews performed?

5. What procedures are followed?

6. How are special reviews scheduled?

7. Are there any regularly scheduled special reviews?

8. How does an AFDC special review interface with other programs, e.g., Food Stamps?

G. Redetermination

1. What are the guidelines concerning redeterminations?

2. How often is radetermination performed?

3. Is redetermination ever waived? By whom? Why?

4. Who performs redetarmination?

5. What procedures are followed for redetermination?

6. What information is gathered during a redetermination?

7. On what forms?

8. What happens if a redetermination is missed? How does that affect the client?

9. Is redetermingtion for other programs (e.g., Food Stamps) done along with AFDC or separately?

H. Other

Fraud and Abuse

1. How are fraud and abuse defined?

2. How are they generally detected?

3. What procedures are followed, in a suspected fraud case?

4. How is such a case initiated? By whom? Who actually carries it out? Frcm which office?

5. What procedures are followed in a suspected abuse case?

6. How is fraud actually determined? Who determines it?

7. How long on the average, does it take to reach a conclusion of fraud?

8. How is abuse actually determined? Who does it? How long does it take to reach a conclusion of abuse in general?

9. How many (percent) suspected abuse cases are actually pursued? Proven? What is the outcome of a proven abuse?

I. Fair Hearings

1. What is your involvement in Fair Hearings?

J. Emergency Provisions

1. What emergency provisions are there for contacting the office and getting help:
for new applicants
for established clients?

2. What guidelines are there concerning emergencies? When is an emergency deemed to exist?

3. How do normal procedures vary in case of emergency?

4. What kinds of assistance are available in emergency cases?

5. What kinds of referrals are made in emergency cases?

6. What kinds of emergencies do you deal with?

1. Are there any changes in the organization of the office or agency that could improve your efficiency or effectiveness? Describe.

2. Are there any changes in policies or procedures that could improve your efficiency or effectiveness? Describe.

3. Are there any changes in the work flow or other agency functions that could improve your efficiency or effectiveness? Describe.