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ABSTRACT

Substate regional organizations (defined as those public bodies that provide planning, economic development, and service coordination for local governments) are discussed, and the major issues pertaining to substate regionalism are explored in this overview. The background and setting of the substate regional movement is traced, from its inception in 1954 when federal aid for regional planning began, through present federal programs in the fields of economic development, employment, health, law enforcement, and transportation. The role of the U.S. Department of Agriculture, one of the federal agencies supporting multicounty substate regional activities, is described, and its leadership in promoting regional solutions to problems of rural development and natural resources conservation is acknowledged. Differences in problems and functional focuses of regional councils in nonmetropolitan areas (from those in urban regions) are discussed. Thirty-nine federal programs which supported substate regional activities during 1977-1979 are described, including both the "generalist", multipurpose areawide units and the multicounty single-purpose areawide units. Selection criteria, program identification, and program characteristics are reviewed. (JD)

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# FEDERAL PROGRAMS SUPPORTING MULTICOUNTY SUBSTATE REGIONAL ACTIVITIES: AN OVERVIEW

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#### ABSTRACT

Thirty-nine Federal programs enabled substate regional organizations to provide technical, managerial, and program assistance to local governments during 1977-79. Many of the programs were available nationally, but a large number imposed limitations on the eligibility of the various regions and substate areas. Five criteria guided the selection of the programs that are reviewed: (1) Federal connection, (2) multi-county area focus, (3) planning and policy development focus, (4) local control, and (5) continuing nature.

Keywords: Multicounty districts, Government aid, Programs, Planning, Grants, Federal, Regional, Local governments, Economic development, Rural development.

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## SUMMARY

Substate regional organizations--those public bodies that provide planning, economic development, and service coordination for groups of local metropolitan and nonmetropolitan governments--help local governments provide services they could not afford on their own. Substate regionalism--the formation of these regional councils and agencies--has been supported by a number of Federal grant programs over the years. In 1977-79, these programs totaled 39, four of them administered by the U.S. Department of Agriculture.

These 39 Federal programs have assisted in the creation of substate regional organizations in both metropolitan and nonmetropolitan areas. However, because the problems faced by the local governments are different, substate regional councils and agencies have developed along different lines in metropolitan and nonmetropolitan areas. Nonmetropolitan regional councils serve a more widely dispersed set of local governments and face a different set of social problems. In addition, nonmetropolitan councils place more emphasis on providing general management planning and policy advice to local governments, while metropolitan councils devote more attention to planning in such specific areas as environmental quality and transportation.

The 39 Federal programs supporting substate regionalism deal with a wide range of specific policy issues. Most of the programs assist the "generalist" regional organizations, those that perform tasks in several areas such as transportation, land use planning, and economic development. Some of the Federal programs, however, such as the one for health planning, assist only substate regional organizations that are devoted solely to health planning. Most of these Federal programs are available nationwide, although many impose limitations as to what regions of the country and what substate regional organizations are eligible to receive assistance.

# Federal Programs Supporting Multicounty Substate Regional Activities: An Overview

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## INTRODUCTION

This report reviews the Federal programs that support activities of multicounty substate organizations--public bodies providing a variety of planning, economic development, and service coordination functions. First, we explore the major issues pertaining to substate regionalism. These primarily relate to (1) differences in problems faced by regional councils in nonmetropolitan areas and (2) differences in these councils' functional focus. Second, we trace the substate regional movement from its inception to the present. Third, we identify the Federal programs supporting multicounty substate regional activities during 1977-79. These include both the multipurpose areawide units and the multicounty single-purpose areawide units.

Five criteria guided the selection of the 39 programs studied: (1) Federal connection, (2) multicounty area focus, (3) planning and policy development focus, (4) local control, and (5) continuing nature. The 1977-79 period was selected for analysis for two primary reasons. First, it covers the period since the 1977 survey of regional organizations was conducted by the U.S. Bureau of the Census (76).<sup>1/</sup> Second, it was deemed desirable to have more than a 1-year look at a subject as complex as Federal substate regional programs.

## Background and Setting

Substate regionalism's history is closely related with the Federal grant-in-aid system, as most grants and other relevant programs supporting it are a subset of the latter. Federal grants in aid, which were not very significant before World War II, have become increasingly significant. For example, as recently as fiscal year 1960 Federal grants in aid totaled only 7.6 percent of Federal budget outlays and 14.7 percent of State and local expenditures (91, p. 254). These same percentages in fiscal year 1980 are expected to increase to 15.8 and 25.3, respectively (91, p. 254).

The increase in Federal grant-in-aid programs has been striking. One analysis indicated that only 10 Federal categorical grant-in-aid programs had been established by 1930 and 27 by 1945 (6, pp. 139-145). This figure advanced to 160 in 1962 and 379 in 1967 (4, p. 25; 7, p. 94). For fiscal years 1975 and 1978, the Advisory Commission on Intergovernmental Relations (ACIR) identified 442 and 492 federally funded State and local categorical grant programs, respectively (1, p. 1; 2, p. 1; 4, pp. 5, 33, 91-92, 287). However, only a fraction of these programs funded planning by State and local governments. According to a 1969 Federal Interagency Task Force on Planning

<sup>1/</sup> Underscored numbers in parentheses refer to items in the Literature Cited at the end of this report.

Assistance, 9 federally assisted planning programs existed in 1964, 9 were added in 1965, and 17 more were added between 1965 and 1969 (83, p. 7). An Office of Management and Budget (OMB) count in 1977 identified 162 Federal assistance programs in 17 Federal agencies which imposed planning requirements on State and local governments (87). Of the 162 programs, 25 had requirements at the areawide level and 38 had requirements at both the State and areawide levels (90, p. 236).

The Federal Government has had a significant impact on the growth of substate regionalism. For example, in early 1964 only five Federal planning grant programs for community development used an areawide approach. In 1972, there were 24 such programs (11, pp. 168-169). According to ACIR, by 1976, 32 Federal programs were important for substate regional activity (12, pp. 11-19). However, the exact number of programs varies with how they are classified.

The spread of substate regional districts was also quickened in the midsixties as a result of a number of Federal actions that did not involve grants. Such Federal actions are represented by such items as section 204 of the Model Cities Act of 1966, the Intergovernmental Cooperation Act of 1968, and OMB Circular A-95 issued in 1969. In 1965, only four States had designated a statewide system of substate districts (11, p. 236). By 1970, the total was 23 States; in 1972 it was 40; and in 1976 it was 45 (11, pp. 236-237; 12, p. 9; 38, p. 17). In 1965, a total of 62 substate districts had been designated (11, pp. 238-239; 38, p. 17). Substate districts totaled 355 by 1970; in 1972, 488; and in 1976, 530 (11, pp. 222, 238-239; 12, p. 9; 38, p. 17).

State-mandated substate districts (in the narrowest sense) are simply area delineations and, hence, boxes on the map (44, p. 173). Moreover, in only a few cases were general purpose State-sponsored substate regional organizations formed before the federally encouraged areawide units came on the scene (97, p. 16). In contrast, the term regional council represents an actual areawide organization (11, pp. 50, 221-252; 12, pp. 9-25; 97, pp. 14-15; 101, pp. 16-17). In 1972, some 56 percent of the districts contained officially designated and functioning areawide organizations (11, p. 222; 12, p. 9). This figure, by 1973, had increased to 75 percent and by 1976 it had advanced to 95 percent (12, p. 9; 97, p. 16).

Federal grant-in-aid programs directed at State and local governments caused the creation of a large number of both multipurpose and special-purpose multicounty substate units.<sup>2/</sup> The multipurpose areawide units are regional councils which usually are councils of governments (COG's) or regional planning commissions (RPC's) (11, p. 51; 97, pp. 14-15). "Regional councils," over time, became a generic term used to refer to "all multijurisdictional organizations controlled by local elected officials regardless of original form" (41, p. 71).

COG's are multifunctional voluntary regional associations of elected local officials or local governments represented by elected officials. The governing body of a COG is composed predominantly of the chief elected officials of the member political jurisdictions, and at least part of its funds are derived from local public sources (8, p. 106; 11, p. 50; 97, p. 15; 101, pp. 16-17). RPC's are public planning bodies authorized by the State legislature, and a number serve as official State agencies

<sup>2/</sup> There are four types of substate districts: (1) special districts, (2) regional councils of various types, (3) single-purpose areawide units established specifically to administer Federal programs, and (4) State-established districting systems (8, pp. 105-107; 97, p. 14). This report focuses on (2) and (3). Hanson has suggested four basic objectives of regionalism: (1) to manage conflict between jurisdictions and programs; (2) to manage development; (3) to rationalize the allocation of resources to and within regions; and (4) to provide a more effective political and administrative organization of State government (43, p. 185).

under a specific act or general enabling legislation. Instead of elected local officials, their members are citizens appointed by the State government or localities involved (11, p. 50; 41, pp. 66-68; 57, p. 6). Many of the older traits that differentiated COG's and RPC's have disappeared since the midsixties (11, p. 75; 41, pp. 70-71; 107, p. 434).

Historically, the multipurpose regional councils have been supported largely by section 701 (Housing Act of 1954) funds from the U.S. Department of Housing and Urban Development (HUD), although a number of other Federal agencies have played an increasing role (8, p. 106; 53, p. 8; 57, pp. 6, 13, 72-73, 95-96, 110-120; 82, p. 17). In actuality, regional councils are not governmental units as they cannot do such things as adopt or enforce building codes, land use ordinances, subdivision regulations, tax levies, and zoning, nor can they incur bonded indebtedness (38, p. 12; 72, pp. 296-297). Their powers are primarily advisory and their services are mainly software items--coordinating, joint purchasing, planning, and technical assistance (11, p. 51; 38, pp. 17-19; 41, p. 66; 73, pp. 104-107, 130).

Most regional council authority is granted either by Governors via executive order, by legislatures through specific actions, or by a combination of the two. Typically, such actions make them the official areawide clearinghouses under the provisions of OMB Circular A-95. (In some cases they also have been designated as areawide clearinghouses for State grant programs.) There were 550 areawide clearinghouses in 1977, of which over 300 had been designated by Governors in nonmetropolitan areas (85, p. 2).

A number of Federal grant-in-aid and planning assistance programs have been responsible for the formation of a large number of multicounty substate special-purpose units (17, pp. 2-4; 97, pp. 15-16). A majority of these units have been established to perform single-function activities (38, p. 15; 57, pp. 41-45, 105-108, 110, 121). Unlike traditional special districts and public authorities, however, most of these new single-purpose bodies are concerned primarily with areawide planning and grant administration rather than with operating programs or direct service provision (11, p. 2). They almost universally lack the authority to tax or to sell bonds (56, p. 120). Most of their revenues also are obtained from Federal sources rather than user charges imposed on private citizens or from local government contributions (11, p. 2; 38, p. 16; 41, pp. 137-139; 57, pp. 6, 13, 27, 62, 100-104; 97, p. 15). Because of this funding approach, it is felt that some of these areawide units tend to be less accountable to the general public and its elected representatives than are the traditional units of local government (11, p. 2). Some have questioned whether these entities are units of government because of their unique characteristics (56, p. 120; 57, pp. 1, 6, 81). However, they do have the governmental character of traditional special districts in that they operate largely with public funds, often have one function, and are established to serve only certain areas (56, p. 120; 97, p. 14).

The multipurpose and special-purpose areawide units brought about by the Federal Government are attempts to form a new capacity at the local level to develop goals and engage in actions affecting an entire region (56, p. 116; 97, pp. 16-17). In some ways the programs represent a Federal effort to compensate for a lack of regional governing capacity at the local level (56, p. 114). Therefore, it becomes a question of whether a policy mechanism can be developed that can provide agreement on areawide activities and projects to insure that actions taken within the area are consistent with the agreed-upon goals (56, p. 115).

The goals for areawide action (while not strictly defined by the Federal Government) are aimed at enabling local units to establish their own policy capacity over areawide matters (56, p. 118). So, federally encouraged areawide units in many ways have supported noncentralized government (56, p. 118). The result has been the

Federal encouragement of "ad hoc agencies, having a potential multijurisdictional base of action" (56, p. 118; also see 42, p. 157; 57, p. 121; and 106, p. 288).

Federal grant and planning assistance growth quickly spawned new multicounty, multipurpose, and special-purpose organizations. For example, according to ACIR, by 1972 areawide Federal programs had given rise to 13 different types of regional organizations created in accordance with the requirements of 19 of the 24 Federal areawide programs then in existence (11, p. 174). By that same year, different federally induced geographic program areas totaled 4,045 (11, p. 215). These included, among others, 481 substate law enforcement planning regions (LEAA's), 957 community action agencies (CAA's), 419 comprehensive manpower planning areas (CAMPS), 195 comprehensive areawide health planning agencies (CHP's or 314b's), 115 economic development districts (EDD's), 56 local development districts (LDD's), 165 resource conservation and development districts (RC&D's), and 247 air quality regions (11, pp. 2, 175-178, 215, 341).<sup>3/</sup>

Even when the piggybacked single-purpose functions carried out by the multipurpose regional councils were considered, the 4,000-plus program areas of the early seventies combined to total approximately 1,800 substate regional organizations (11, p. 12, 316; 97, p. 15). Today, there are almost 2,000 substate regional organizations (17, p. 2; 76, p. 3; 83, p. 7). About 675 of these are multipurpose regional councils, the balance largely federally induced single-purpose units of various types (59; 76, p. 3). Mogulof noted in 1973 that "the rapid growth of regional councils in recent years has been a most significant development" (56, p. 123).

One observer maintained that "There is no doubt but that the confused variety of Federal development programs and agencies is a product of the committee structure of Congress" (103, p. 33). This structure rests on single-purpose, functionally oriented interests. Each agency and department typically deals with a single committee, or subcommittee, with regard to authorizations for its major programs (103, p. 33; also see 41, pp. 139, 267). The result is an accumulation of numerous program-by-program enactments over a period of years and national growth and development policies that are fragmentary (16, pp. 192-200; 17, p. 43).

Walker noted in 1973 that "Substate regionalism is one of the most dramatic and confusing of the recent changes in American federalism" (96, p. 79). Subsequent events did not serve to allay his concern, because in analyzing the situation as of 1977, he wrote:

The current condition of substate regionalism is, if anything, more complex, more confused, more competitive, yet more critical than it was even a short five years ago when the topic first became the subject of intensive study and discussion by the Advisory Commission on Intergovernmental Relations (ACIR), the Metropolitan Fund (Detroit), the National Academy of Public Administration, the public interest groups representing the States, counties, and cities, and others (95, p. 21).

Rapid expansion in multipurpose and special-purpose substate areawide units of government has created and exacerbated a number of problems. One is the creation of a new layer of paragovernments or quasigovernments with a variety of objectives (16, p. 192). More important is the potentially greater degree of intraregional competition and the increased problems of communication and coordination that have been introduced

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<sup>3/</sup> In addition to the increased number of programs, several of the programs have been replaced by new schemes. The CAMPS and CHP's are examples.

(11, pp. 78-87). Some feel that fragmentation of local government--already a significant problem--has been in some ways aggravated (11, pp. 11-15; 25, p. 19; 56, p. 118; 68, p. 69).

Others see this problem differently. They note that the substate movement has contributed to more regional units but it also has moderated the effects of fragmentation, if not the fragmentation itself, by bringing an areawide coordinating influence via the regional councils to bear on the planning, policymaking, and operations of local governments (97, p. 17). Moreover, the term fragmentation is not a clear concept in the governmental context because it has both spatial and functional implications (53, pp. 4-5). Marando has noted that various metropolitan governmental structures have been described as fragmented, multinucleated, proliferated, fractionated, uncoordinated, monocratic, crazy-quilt, overlapping, chaotic, and unintegrated (53, pp. 4-5). In his view, "These terms exhibit more currency than documentation" (53, p. 4).

#### USDA's Role

The growth of substate regionalism holds considerable importance for nonmetropolitan areas. Governments in these areas tend to be fragmented with limited functions, resources, and capabilities (11, p. 345; 71, pp. 225-226). These factors combine to give substate regionalism a special role in nonmetropolitan areas. Thus, many rural governments need considerable technical assistance to aid their officials (39, pp. 173-174; 79, pp. 1-11, 5-6, 10, 12). Such governments are diverse and much of the assistance to date has been highly functional in nature (39, pp. 172-173). Regional councils have a major role in providing technical assistance to local governments in nonmetropolitan areas "where talent is thinly spread" (71, p. 221). The regional council in fact may be the "only governmental organization with substantial professional and managerial expertise" in many nonmetropolitan areas (11, p. 270; also see 12, p. 5; 71, pp. 240-241). Smaller communities need assistance in economic development projects, planning, and even in locating qualified advisors (71, p. 220; 88, p. 27). In assisting nonmetropolitan local governments to deal more effectively with their problems, regional councils have been characterized as (1) regional chambers of commerce, (2) industrial development organizations, (3) grantsmen and promoters, and (4) technical assistance agents (11, p. 270).

Despite these facts the prevalent attitude has largely been to neglect the problems faced by rural local governments (25; 52; 108). The dominant attitude has been that the local government problems are confined largely to urban areas and, as MacDougall has written, this implied that "everything in rural America is wonderful" (52, p. 36). As a result, much of our knowledge of rural administration "tends to consist of myths, fugitive studies, or questionable inferences based on our knowledge and understanding of larger entities" (108, p. 13).

The seventies have seen a shift of population back to rural areas and this has precipitated a reappraisal of rural America and its population, spatial relationships, service demands, resource deficiencies, community characteristics, and organizational disparities and relationships (25, p. 18; 108, p. 13). Many feel that more attention needs to be paid to the problems of rural local government administration, operations, and organizations (25; 108). Thus, the U.S. Department of Agriculture (USDA) has a stake in substate regional issues, not only due to some of USDA's research, policies, and programs, but also because of its decentralized structure of local offices (7, p. 204; 11, pp. 212, 214; 39, p. 180; 71, p. 26).

First, consider some of the USDA research on substate regionalism. In 1969, USDA's Economic Research Service (now the Economics, Statistics, and Cooperatives Service) initiated the development district information system (DDIS). It included

staffing, funding, and program information on five types of comprehensive districts with the criteria for inclusion being that the districts were (1) multicounty, (2) multipurpose, and (3) found nationwide (61). This service included semiannual updates of a master notebook and maps. It found wide acceptance, but was discontinued in 1974 after the pace of change in substate regional boundaries had slowed drastically. In 1972, the Farmers Home Administration (FmHA) funded a major study of substate regional agencies (58). In 1975, the Economic Research Service conducted case studies of 10 development districts in rural areas of six States (33). Under the Agricultural Act of 1970 (title IX, section 901(c) of P.L. 91-524), the Secretary of Agriculture was required to join with the Secretary of Housing and Urban Development (HUD) to report annual progress in providing financial and technical assistance to nonmetropolitan areawide planning agencies (81). A number of USDA agencies contributed to this report.

The 1977 USDA Rural Development Policy Study examined the delineation of a single set of substate districts and operation of all Federal development programs through these districts as one option to aid institutional capacity in rural areas (79, pp. 5-6, 10, 12). In 1978, a USDA task force studied the RC&D program to examine ways in which it "could be redirected to effectively carry out USDA objectives of rural development by utilizing, conserving, and developing resources" (78, p. 1). This effort required considerable research and knowledge of the field of substate regionalism. Other research reports have utilized the substate regional council area configurations. For instance, reports on government services in rural America have been prepared periodically by USDA for the President to submit to the Congress. These reports were prepared pursuant to title IX, section 901(e), of the Agricultural Act of 1970. Periodically a report was made based on Federal outlays by individual programs accruing to substate planning and development district areas (92).

Next, consider some of the USDA policies and programs that relate to substate regionalism. Under section 603(b) of the Rural Development Act of 1972 (P.L. 92-419) the Secretary of Agriculture is authorized and directed to provide leadership and coordination within the executive branch and assume responsibility for coordinating a nationwide rural development program in cooperation with rural development programs of State and local governments (4, pp. 262-264; 29, p. 70). Within the Federal Government, USDA alone administers a considerable number of programs specifically designated as rural developmental (10, p. 19).

The Rural Development Act of 1972 also gave USDA further responsibilities bearing on substate regional issues. Under section 603 of the act, the Secretary of Agriculture is required to establish national rural development goals and to report on progress toward their attainment; this includes addressing substate regional issues (80, pp. 38-39). In addition, starting in fiscal year 1978, USDA began making rural development planning grants to regional councils under authority contained in section 111 of the act. In that same year, FmHA began funding a number of regional housing authorities in nonmetropolitan areas under its new rural rental assistance program as authorized by P.L. 93-383, the Housing and Community Development Act of 1974. And in fiscal year 1979, FmHA began assisting regional councils and other local agencies in planning adequate levels of public services in areas affected by energy developments. This assistance is provided under a new energy impacted area development assistance program that was authorized by section 601 of P.L. 95-620. Between 1964 and 1979, 184 resource and conservation development (RC&D) areas were approved for assistance by USDA's Soil Conservation Service (SCS) under the provisions of P.L. 87-703 (78, p. 1).

#### ISSUES

There are numerous issues pertaining to the field of substate regionalism (66; 67). Two major issues within the field are: (1) the differences in problems faced by

regional councils in nonmetropolitan versus metropolitan areas, and (2) the differences in functional focus. Evidence shows that nonmetropolitan regional councils face service areas, clientele characteristics, government organization and expertise, and local outlook and values that differ considerably from their metropolitan counterparts. This has given rise to a number of issues for the nonmetropolitan units. Regarding the functional focus of both the multipurpose regional councils and the single-purpose areawide organizations, the former stem from generalist and the latter from functionalist program interests affecting the substate field. Differences of opinion exist about the degree that single-purpose interests should be linked or subservient to the multipurpose regional councils. Thus, issues and tensions arise and continue between generalists and functionalists as reflected in the varying fortunes of multipurpose versus single-purpose regionalism.

### Nonmetropolitan Differences

A 1972 survey conducted by ACIR and the National Association of Regional Councils (NARC) found that, with respect to jurisdiction, 45 percent of the regional councils served nonmetropolitan areas exclusively. The remainder served Standard Metropolitan Statistical Areas (SMSA's)<sup>4/</sup> at least in part: 26 percent included more than one SMSA; 21 percent were coterminous with a single SMSA; and 6 percent included only part of an SMSA (11, pp. 79-80).<sup>5/</sup>

Several other studies have found even larger proportions of councils in nonmetropolitan areas since the 1972 survey. A-95 clearinghouses are usually regional councils, though they do not include all councils. In April 1973, the ACIR found that nearly 53 percent (238) of the 450 regional A-95 clearinghouses served nonmetropolitan areas (11, p. 147). In 1977, about 55 percent of the 550 A-95 clearinghouses were found to serve areas outside SMSA's (85, p. 2). Out of the total of 669 regional councils that are recognized by NARC, approximately 55.6 percent had headquarters outside SMSA boundaries (62). Thus, a majority of both regional councils and A-95 clearinghouses serve nonmetropolitan areas.

Regional councils that serve nonmetropolitan areas differ from their metropolitan counterparts. Among the more obvious differences are the larger territories and smaller populations served. There are also differences in the governmental structures with which they must deal, the social characteristics of their constituencies, and the range of problems to be faced. Inevitably these differences lead to variations in the way metropolitan and nonmetropolitan regional councils function, the tasks they undertake to perform, and the degree of support they enjoy among the localities they serve.<sup>6/</sup>

<sup>4/</sup> A Standard Metropolitan Statistical Area (SMSA) is a county or group of contiguous counties which contain at least one city of 50,000 inhabitants or more, or twin cities with a combined population of at least 50,000. Contiguous counties are included in an SMSA if according to certain criteria they are socially and economically integrated with the central city. An urbanized area consists of a central city, or cities, with a population of 50,000 inhabitants or more and the surrounding closely settled territory. For detailed definitions, see (77).

<sup>5/</sup> Figures based on the 312 (44 percent) questionnaires returned of the 705 that were mailed (11, p. 79).

<sup>6/</sup> Many SMSA's contain sparsely settled rural hinterlands outside the built-up areas surrounding the central city. Thus, even a metropolitan regional council may face some of the nonmetropolitan problems discussed in this section.

~~The differences between regional councils serving metropolitan and nonmetropolitan areas are reviewed here.~~<sup>7/</sup> Many of the issues raised are best considered to be hypotheses which remain to be tested; others are generalizations that, in view of the recognized heterogeneity of nonmetropolitan areas, doubtless have a number of exceptions (46, pp. 317-318). Nor is it likely that the list is complete. The issues fall generally into several broad groups and will be discussed in the following order: (1) the socioeconomic and governmental environment in which they exist; (2) institutional differences between metropolitan and nonmetropolitan councils; and (3) differences in the functions addressed and the roles performed by councils serving the two areas.

- (1) Perhaps the most obvious difference between metropolitan and nonmetropolitan regional councils is the size of the populations each serves. A recent study comparing regional councils in existence in October 1978 found that metropolitan area councils served an average of nearly 800,000 residents, over six times the average of 123,000 served by nonmetropolitan councils (62, p. 4). The population differences are at least partly due to the lower population densities in rural areas. In 1970, the population density inside SMSA's was 360 persons per square mile compared with only 20 persons per square mile outside SMSA's (74, p. 18).

Both characteristics have important consequences. The smaller population size of nonmetropolitan councils means that they have a smaller resource base on which to draw in obtaining program financing. In addition, the lower densities in nonmetropolitan areas present them with a number of service delivery difficulties that stem from problems involving time and space. As a result, regional councils operating in such areas often stress a different mix of programs than do metropolitan regional councils. An example would be an emphasis on better road maintenance and health services in many nonmetropolitan areas (108, pp. 15-17).

- (2) According to the 1977 Census of Governments, 67.6 percent of the 79,862 local governmental units were located in nonmetropolitan areas (75, p. 1). This included 80.5 percent of all counties, 65.8 percent of all municipalities, 76.0 percent of all townships, and 63.1 percent of all special districts.

The greater number of governmental units, coupled with a less dense settlement pattern, has led to a number of real as well as alleged inadequacies of nonmetropolitan local governments. Among others, this includes an inability to provide the type and range of services needed, disproportionately high service costs, a tendency toward diseconomies of scale, lack of planning capacity, less use of cooperative agreements, and less leadership capacity (10, pp. 4-6; 15, pp. 111-125; 18, p. 59). The term fragmentation has often been used to summarize the problems caused by too many governmental units and too few people (11, pp. 11-15; 25, pp. 19, 22; 58, pp. 32-33; 71, p. 225; 83, pp. 12-13; 106, pp. 286, 288).

<sup>7/</sup> Sometimes there has been a lack of clarity in the literature in the use of the terms metropolitan council and regional council (11, pp. 242-243; 57, p. 2). While some observers use the term "metropolitan" for an urban concentration and "regional" for a jurisdiction of generally rural character, others use the terms interchangeably. Clearer terminology might be "areawide-metropolitan" and "areawide-nonmetropolitan" but this has never gained acceptance (57, p. 2). This report uses the terms metropolitan regional council, metropolitan council, or metropolitan areawide for regions that include all or part of an SMSA; and we use nonmetropolitan regional council, nonmetropolitan council, or nonmetropolitan areawide for regions that do not include any portion of an SMSA.

A number of plans have been originated as a means of solving these problems. Occupying a prominent position on any list would be the various types of contracting, consolidation, or regionalism schemes to achieve size economies in planning and service delivery (11, pp. 254, 259-260, 262, 275). Regional councils have been advanced by their advocates as being important in providing professional and managerial expertise and other services on a regional level in nonmetropolitan areas (11, pp. 268-270).

Caution should be exercised in evaluating some of the alleged benefits of regionalism, however. For example, in the past, the problems of size diseconomies faced by smaller units of local governments probably have been oversold by most analysts, because evidence suggests the economies that can be achieved through regionalization are likely to be limited (28, p. 78; 36; 43, p. 185; 47, p. 236). In addition, the possible benefits from coordination among local governments may be less than first supposed. Although nonmetropolitan areas usually contain more general purpose local governments, there is less likelihood of the actions of one government causing problems for another than in metropolitan areas, where governments are in closer proximity to each other and thus more interdependent (11, p. 254; 24, pp. 2-3).

- (3) The social and economic status of nonmetropolitan residents tends to be lower than that of metropolitan area residents. In a general historical context, nonmetropolitan areas have had lower per capita incomes; lower education levels for people 25 years and older; fewer health specialists; more underemployment; a higher proportion of poverty level people; loss of traditional industries; an inability to attract new industry; outmigration of people with more talent and education; and an older resident population (10; 11, p. 254; 45, pp. vii, 61-64). However, the nonmetropolitan population turnaround of the seventies may have mitigated or even overcome these problems in selected nonmetropolitan areas (20; 21; 22; 25; 108). Nevertheless, the latest evidence shows that nonmetropolitan areas continue to lag behind metropolitan areas in a number of major socioeconomic areas (37; 93).
  - (4) Nonmetropolitan areas usually share a lesser sense of regional identity than do metropolitan areas. SMSA's usually exhibit a significant degree of social and economic integration between the outlying areas and the central city. Such integration is seldom found in nonmetropolitan regions, which typically include a number of small and disparate population centers. Moreover, even if there is a single dominant center, it is less likely, given its relatively small size, to have the influence possessed by the central city of an SMSA. As a result, regional programs may be less meaningful to decisionmakers in nonmetropolitan areas, and nonmetropolitan regional councils may find it harder to gain support for programs or recommendations that are regionally oriented (24, pp. 1-2).
- Admittedly, support for regional programs depends on the issue. For example, from Bender's work it appears that regional councils in Georgia had a more solid base of support in rural communities than in urban areas, at least for those issues that involved regional council assistance to rural communities. His study did not indicate whether rural areas would be more or less willing than urban areas to grant regional councils actual control over programs in specific areas (23, pp. 42-43).
- (5) There also are differences in degrees of pluralism between metropolitan and nonmetropolitan areas. Nonmetropolitan regional councils are less likely to face the variety of regional interest groups attempting to influence

their discussions (24, p. 6). The range of views may be as intense in nonmetropolitan areas as in metropolitan areas, but the minority interests often are so small, so relatively leaderless, or so underfinanced that they do not become significant factors (24, p. 6). In addition, public conflict typically is lessened in rural areas because many residents know each other and citizen input is obtained through both formal and informal lines of communication (11, p. 260; 32, p. 5). However, this may pose a danger for nonmetropolitan regional councils, as they may lack effective adversary relationships that can bring forth the range of information needed to make informed decisions (24, p. 6).

- (6) Nonmetropolitan regional council areas are somewhat less likely to have sharp racial, economic, or other socioeconomic distinctions among their political subdivisions (24, p. 6; 35, pp. 49-50). A cursory review of the demographic characteristics of the new urban to rural migrants of the seventies suggests a homogeneity unlike that of the earlier rural to urban migrants (108, p. 14). As a result, nonmetropolitan clearinghouses will be less frequently confronted with projects that increase racial or economic segregation or that arouse issues associated with them (24, p. 5).
- (7) Generally, nonmetropolitan regional councils have budgets and salary scales lower than their metropolitan counterparts (24, p. 6; 62). As a result, their staffs tend to be smaller, less specialized, and less experienced.

A number of observers have noted that, despite these limitations, the reputation and powers of substate regional organizations appear to be at their height in places with smaller populations and in rural areas (23, pp. 42-43; 31; p. 110; 35, pp. 49-50; 101, pp. 119-120). Several reasons are advanced for this observation. One is that their credibility and importance have been established because they have been conduits for substantial amounts of Federal money (31, p. 110; 35, p. 50). The governments they serve in such areas need considerable assistance with grantsmanship, planning, and capacity building. Also, the regional problems these governments face are often relatively uncomplicated and uncontroversial (35, p. 50). Regional councils in such areas often do not face the equity problems of their metropolitan neighbors and thus can concentrate on development and conservation projects of obvious advantage to everyone (35, p. 50). The benefits of joint action appear to be greatest in the rural areas, and the relative parity of the participants in terms of population prevents the kind of jealousies that occur in the large metropolitan areas where jurisdictions vary more widely in size (31, p. 110).

- (8) Nonmetropolitan regional councils tend to suffer more from a lack of continuity in membership; from a lack of involvement and understanding on the part of governmental units not directly represented; and from an overall more delicate operating consensus (24, p. 8). Regional councils that operate under such constraints are less likely to take a strong coordinative or leadership role in areawide affairs (24, p. 8).

The reason for this difference between metropolitan and nonmetropolitan substate agencies stems from membership arrangements (60, pp. 10-16). Nonmetropolitan regional councils usually have more political subdivisions eligible for membership and thus are less able to easily accommodate a representative from each on the primary policymaking body (executive council or general assembly) (24, p. 7). As a result, sometimes people are chosen to represent (1) a class or type of political subdivision or (2) the units from a specific geographical area (24, pp. 7-8). The result is a

relatively greater problem in membership continuity, involvement, and operating consensus.

- (9) In nonmetropolitan areas, there is less geographical conformance between the boundaries of metropolitan and special-purpose substate regional boundaries (24, p. 2). Also, there is more functional conformance or piggybacking of Federal regional programs on multipurpose regional councils in metropolitan areas (11, pp. 148, 157-158, 199-205). Moreover, the headquarters of the various types of substate regional organizations tend to be more frequently located in or near the core city or cities in the case of metropolitan areas. The result is that the nonmetropolitan umbrella regional agency typically has a more difficult role as coordinator (24, p. 2).
- (10) Nonmetropolitan regional councils are more often required to prepare regional plans that allocate resources, facilities, services, and jobs rather clearly to a particular community within the region (24, p. 2). Although the benefits of such an action may be dispersed throughout a wide area, these benefits are likely to be more localized than in metropolitan areas where, because of their greater compactness and socioeconomic interdependence, a more general dispersal of benefits is likely to occur (24, p. 4). Thus, while nonmetropolitan councils have a greater potential to reallocate resources within their regions, doing so could strain them more than their metropolitan cousins.
- (11) In nonmetropolitan areas, local governments have tended to be less active and less likely to be in contact or conflict with one another (11, p. 254). Coordination of what is already happening is not as great a concern in these areas as banding together to initiate new or improved services and facilities by pooling scarce resources (11, p. 254). Because of less dense settlement patterns and limited financial and staff resources, regional planning conducted in nonmetropolitan areas often will emphasize the joint provision of local services through an interlocal cooperation act or other means (24, p. 5). Thus, nonmetropolitan regional councils are likely to see a larger percentage of such proposed programs or projects (24, p. 5).
- (12) A recurrent theme in the literature is the need for professional planning assistance in the operation of small communities (25, p. 22). Limited resources prevent many small communities from hiring professional staffs (32, p. 6). This need can be alleviated through the pooling of local resources plus Federal and State assistance being funneled to a regional council having a professional staff (83, pp. 11-12).

The regional council planning staff in nonmetropolitan areas faces problems that are different from those faced by the staff of its metropolitan counterpart. Generally, regional planning activities have been initiated more recently in nonmetropolitan areas (62). As a result, they are usually not as refined or complete in coverage (24, p. 3). The ability of nonmetropolitan regional councils to provide adequate review under OMB's Circular A-95 is thereby weakened (24, pp. 3-4).

The type of planning that nonmetropolitan regional councils are asked to perform differs from that requested of metropolitan councils because population settlement patterns are more dispersed and natural resources more important to the economies of nonmetropolitan areas. Nonmetropolitan regional councils do relatively more planning for natural resources and

relatively less of the traditional land use, transportation, and community facility planning typically found in metropolitan areas (24, p. 3).

In addition, there has been considerable stress on promoting economic development in nonmetropolitan areas (11, pp. 254, 265-275; 24, pp. 3, 6-7; 71, pp. 175, 228). Nonmetropolitan regional councils also stress grantsmanship and technical assistance (71, pp. 240-241). This is in contrast to metropolitan councils that tend to be more concerned about equity considerations, interagency coordination of conflicting governmental plans and programs, problems of housing and education, and the provision of areawide services (11, p. 275; 71, pp. 240-241).

- (13) Typically, nonmetropolitan regional councils are more oriented toward delivering services to their membership, even those services traditionally considered to be local (24, p. 8). Nonmetropolitan regional councils also act as forums for the exchange of information and ideas (24, p. 8). These characteristics necessarily evolve from the relatively greater need for assistance exhibited by many smaller rural local governments.

#### Functional Focus

There are a significant number of important functions performed and programs and services offered by both multipurpose and single-purpose multicounty substate regional organizations (11; 19; 33; 42; 53; 58; 65; 71; 73; 97; 98; 101).<sup>8/</sup> A similarity runs through the regionalism movement with a significant number of common functions being performed by the various regional councils (11, pp. 243-247; 58, p. 61). Yet there is diversity because a look at the rationale for creating multipurpose and single-purpose units suggests a variety of functional, fiscal, and managerial reasons (11, pp. 231-233, 319-320).

#### Generalists and Functionalists

The current Federal programs supporting substate regionalism result from and represent complex governmental factors. Policy generalists--government officials whose work embraces a number of issue areas--have strongly favored creating multipurpose substate regional clearinghouses to serve as mechanisms for both coordination and policymaking. On the other hand, functionalists--who specialize in individual subject areas such as health--have preferred instrumentalities composed of administrators who are committed to these programs alone (4, p. 282; 41, pp. 75-76, 191, 265-267; 57, pp. 22-23, 62; 96, p. 79). Thus, both elements of decentralization and centralization have been present in the substate movement (55, p. 72; 56, p. 118; 100, pp. 61-62). The result has been the creation of a series of both federally encouraged generalist mechanisms and an even larger number of federally encouraged single-purpose special districts (96, p. 80).<sup>9/</sup>

<sup>8/</sup> Functions tend to be broad and general and to cut across program and service lines. For example, the planning function may be performed for a list of programs or service activities ranging from housing and law enforcement to solid waste and tourism. See 11, pp. 61-62, 94-105, 120-122, 243-247, 267-274, 285-303, 325-327, particularly 98-99; and 97, p. 15.

<sup>9/</sup> ACIR noted the propensity for most federally encouraged substate organizations to be specialist-oriented and for State planning and development districts, clearinghouses, and regional councils to be generalist-oriented (11, p. 316). However, the Federal influence in both areas should be recognized.

Historically, a number of federally encouraged mechanisms gave rise to or encouraged the growth of regional councils (COG's, RPC's, among others) at the local level. These include the areawide planning organizations (APO's), economic development districts (EDD's), local development districts (LDD's), and, in some instances, the resource conservation and development areas (RC&D's). However, some observers have noted that while each multicounty agency began with a particular orientation and emphasis (community, economic, or resource), the tendency of each was to broaden its scope until the distinctions faded and the agencies became strikingly similar in the breadth and scope of their concerns (71, p. 177). For example, the original distinction between COG's and RPC's has largely disappeared (11, p. 50; 41, pp. 70-71; 57, pp. 6, 11; 107, p. 43).<sup>10/</sup> From the Federal Government's viewpoint, the original sponsorship of a substate organization has become secondary as the entity became even more generalist (71, p. 176).

However, despite the record of Federal support for generalist multipurpose regional councils, one should not downplay the functionalists in the present setting (51, p. 220). The considerable number of single-purpose, functional, substate organizations has been spawned by the committee structure of the Congress--a structure which is based on single-purpose functionally oriented interests (4, pp. 55-57, 63-69, 92-93; 103, p. 33). The variation in agency designations for various programs operating at the areawide level also can be accounted for by the fact that different congressional committees do not operate from a common understanding of local intergovernmental relations, on one hand, and accidents of history, on the other (103, p. 28). Moreover, while it is not too difficult to create new institutional arrangements in response to offers of Federal assistance, it can be very difficult to unmake them (103, p. 28).

The result is that present national growth and development policies are fragmentary because they have resulted from numerous program-by-program enactments over the years (11, p. 43; 41, p. 139; 97, p. 16).<sup>11/</sup> The Federal policies and programs directed toward areawide units contain both generalist and functionalist elements (100, pp. 67-78). Therefore, the Federal policies affecting substate regionalism are ambivalent (11, pp. 52-53; 16, p. 202). Nevertheless, in 1976 Merriam observed that "Although the jury is still out, there is considerable evidence that the functionalists are winning out against politically accountable elected officials and their generalist allies" (55, p. 72). Similarly, in 1977 Walker noted that:

The substate regional setting, then, is more cluttered than it was a decade ago and the claimants for power are more numerous. Given the division among the generalists at all levels and the weakness of their institutions at the regional level, one must conclude as of the moment that the functionalists (program specialists) are gradually winning out in the battle over who will dominate the substate regional future (95, p. 28).

Resolution of the conflicts that have built up during the years concerning the generalist-specialist dichotomy is still needed. Many questions have direct policy importance for the areawide units. Perhaps the key question relating to substate areawide units is that relating to piggybacking and umbrella units.

<sup>10/</sup> Some COG's have evolved from EDD's and RPC's (101, p. 26).

<sup>11/</sup> One cannot blame this entirely on the committee and subcommittee system within the Congress. This also is the result of special interest groups, functional specialists within the bureaucracy, the value of categorical grant programs to members of the Congress in building constituency support, and their value to the congressional leadership in the coalition-building process. See 4, pp. 56-57, 62-69, 92-93, especially 69; and 41, pp. 265-267.

### Piggybacking and Umbrella Units

The historical growth of federally supported areawide functional planning bodies of a specialized nature has been partially offset through the use of existing multi-purpose organizations for such functions, or piggybacking, rather than creating a unit for each new single-purpose authority granted. ACIR found in 1971-72 that of the 3,879 regional planning districts established by the States as of 1971 under 10 Federal assistance programs, there was an overall 35-percent geographic boundary coincidence and a 17-percent organizational coincidence (11, p. 157; also see 13, pp. 21-22; 16, pp. 199-200).

A 1972 ACIR study of 296 regional councils (out of some 600) and 10 Federal programs showed that 49 percent of the Federal programs were piggybacked in metropolitan areas as opposed to 43 percent in nonmetropolitan areas (11, pp. 148, 199-205). Piggybacking was less prevalent for programs involving air quality, community action, and employment (11, p. 157). Forty-one percent of the A-95 clearinghouses piggybacked in 1972 by one or more agency designations were nonmetropolitan, while another 18 percent were metropolitan but with a predominantly rural hinterland (11, p. 158). Thus, the greater number of Federal regional programs available in metropolitan areas may have led to the 49-percent to 43-percent metropolitan advantage already noted.

There are arguments both pro and con to the piggyback approach (11, pp. 332-333; 56, pp. 122-124; 101, pp. 114-116). Alleged advantages include size economies, cost savings, staff improvements, and better integrated planning and program coordination.<sup>12/</sup> This has led many observers to urge support of a single multicounty agency responsible both for planning and for project promotion in all fields relating to the area's development (56, pp. 120-130; 57, pp. 91-94, 105-106, 110, 114, 117, 121; 71, p. 227). ACIR, which calls these umbrella multijurisdictional organizations (UMJO's), developed a set of strong recommendations on their behalf in the early seventies.<sup>13/</sup> The ACIR regional program includes the following steps (12, pp. 1-2):

- "(1) activate the State-created substate districts...through State legislation and gubernatorial action;
- (2) confer legal status on these districts as an agency of local government;
- (3) require by State law that all local governments within the district belong to it;
- (4) specify that at least 60 percent of the district membership be elected officials of general-purpose local governments;
- (5) provide an optimal one-person, one-vote procedure;

<sup>12/</sup> There are also a number of alleged disadvantages that stem from reasons as diverse as a political philosophy distrustful of any movement toward regionalism to a desire to keep certain key regional programs, such as health, separate from the general umbrella units for reasons of efficiency (41, p. 266; 56, p. 128; 57, p. 44). Others argue that the States already can delineate a single set of substate districts for all Federal programs, but this has been met with only limited acceptance by local officials.

<sup>13/</sup> Not until the November 1973 version of Circular A-95 did OMB clearly begin to encourage Federal agencies to support a single areawide planning agency (66, pp. 9-10; 83, pp. 23-25).

- (6) designate the district as the A-95 review agency--with the power to 'resolve' local differences;
- (7) provide State funding, at least in part, of the district;
- (8) require that State capital improvements and local programs affecting the region (for example, waste disposal) be reviewed;
- (9) give the district a policy role over all multijurisdictional special districts; and
- (10) authorize the district to assume an operating role (when the majority agree) in areawide activities such as solid waste disposal, transportation, sewage treatment, water supply, and so on." (Also see 3, pp. 118-164; 8, p. 19; 11, pp. 339ff; 16, pp. 204-207; 41, pp. 76-77; 47, p. 237; 89, pp. 35-36; 98, pp. 6-9.)

Walker and Stenberg have argued that, although UMJO's represent a striking departure, they should not be considered regional governments (98, p. 9). They maintain that there are four major features of UMJO's that make this distinction: (1) there would be no direct election of board members; (2) operating responsibility for certain services could be assumed only after a favorable vote of a majority of constituent localities; (3) no direct taxing powers could be exercised; and (4) the Governor would be empowered to veto certain actions conflicting with official statewide plans or with the plans, policies, or activities of another umbrella organization (98, p. 9).

Progress toward adoption of the UMJO concept has been slow. Many States have designated a single substate body to be responsible for comprehensive planning within each substate district, but it is a seemingly giant step to then require the piggy-backing or close coordination of single-purpose functions. For example, by 1975 "more than half" the States recognized one multijurisdictional planning agency for the substate regions (102, p. 47). However, Federal substate regional programs historically have failed to conform to the existing State delineations. As noted, in 1971 only about one-third of the Federal program districts had boundaries that coincided with those of substate districts officially designated by the States (geographical conformance) (5, p. 9; 11, p. 157; 13, p. 21; 16, pp. 199-200). Moreover, in 1972, the State-recognized planning organizations in the State-created substate districts were used by these Federal programs (organizational conformance) only about one-sixth of the time (5, p. 9; 11, p. 157; 13, p. 21). Walker in 1977 observed that "conformance of the boundaries of Federal districting programs and their institutional reliance on the regional units established by the States is only somewhat better than it was in 1972 when these issues were first probed thoroughly" (95, p. 26).

States play a critical role in the establishment of umbrella substate regional councils, because there are limits to how much Federal legislation can influence the allocation of planning responsibilities at State and substate levels (12, p. 32; 44, p. 175; 57, pp. 33-37, 63, 95-99, 121; 83, p. 59; 95, pp. 22, 27; 99, pp. 257-259). Federal agencies find it difficult to resist determined efforts by States to assign functional planning responsibilities to substate comprehensive planning agencies (83, p. 59). Georgia was one of the first States to establish multipurpose substate units (34; 35, pp. 25-37; 71, pp. 159-163; 83, p. 26). Indeed, in the South, the comprehensive substate planning agency tends to be the preferred or mandated instrument; piggy-backing functional planning on comprehensive planning agencies is thus much more common here than elsewhere (62, p. 11; 83, p. 59). Thus, determined States can overcome Federal administrative obstacles to integrated areawide planning (83, p. 59). In

1973, Hartman observed that "For the next few years the development of multicounty regionalism is at the tender mercy of our own States and their political processes" (44, p. 175).

Historically, the establishment of UMJO's has been hampered by differing requirements under Federal programs concerning planning body organizational composition. Both the policy board and citizen participation requirements outlined in administrative regulations, and, in some cases, Federal legislation, differ among the programs (60, pp. 2, 21-24, 35; 71, pp. 165-166; 83, pp. 11, 25; 90, pp. 73-75). For example, HUD's 701 planning program requires that it be administered by a substate regional organization with a governing body composed of at least two-thirds locally elected officials, or persons responsible to them, unless otherwise specified by State law (60, p. 2; 83, p. 25).

The Economic Development Administration's (EDA) regulations require its districts (EDD's) to be composed of at least a majority of locally elected officials and one-third citizens (60, p. 2; 83, p. 26; 90, p. 74). Among others, the Department of Transportation's (DOT's) metropolitan planning organizations (MPO's) and the Environmental Protection Agency's (EPA's) 208 water pollution control planning agencies also must have governing boards comprised of at least 51 percent locally elected officials (60, p. 2; 90, p. 73). The U.S. Department of Health and Human Services (HHS) planning program for aging requires its advisory councils to be composed of at least one-half consumers, including low-income and minority elderly persons (83, p. 26). Its health systems agencies (HSA's) must have governing bodies comprised of 51-60 percent health care consumers; the remainder are health care providers, one-third of whom must be direct providers (60, p. 2). HSA's must also normally serve areas of at least 500,000 people. The Law Enforcement Assistance Administration's (LEAA's) planning program required representatives of law enforcement agencies, criminal justice agencies, and public agencies involved in reducing and controlling crime (60, p. 2; 83, p. 26). Such difficulties make it hard to have one designated planning organization for all the programs.<sup>14/</sup>

Nevertheless, a number of recent policy proposals have advocated the adoption of a nationwide system of UMJO's. In 1977, the General Accounting Office (GAO) recommended that the Congress "establish a national policy on areawide planning and provide a basis for strengthening planning focal points at the areawide level" (83, p. iii; also see 17, p. 31; 41, p. 266; 95, pp. 29-30). Another important example is the Magnuson-Ashley bill on "Intergovernmental Coordination" that would establish a national policy on areawide planning and its coordination.<sup>15/</sup> This bill was introduced in both the 94th and 95th Congresses by Senator Warren Magnuson of Washington

<sup>14/</sup> For example, to receive assistance under HUD's 701 comprehensive planning program, EDD's must be composed of exactly two-thirds locally elected officials except in rare instances (10, p. 25; 90, pp. 73-74). Historically, some of the more specialized Federal substate regional programs have had governing board requirements calling for substantial percentages of citizens and sometimes other specialized representatives as opposed to locally elected officials (90, pp. 73-75). For instance, the former HEW's comprehensive health planning (CHP) districts and the former Office of Economic Opportunity's (OEO's) community action agencies (CAA's) had representation formulas that often ensured that less than half of all governing board members would be elected local officials. This still holds today with the newer health service agencies (HSA's) of HHS and CAA's as continued under OEO's successor, the Community Services Administration (90, pp. 74-75). In regional councils, the opposite often holds with less direct citizen and consumer participation (97, p. 17). This can cause difficulty in the establishment of UMJO's.

<sup>15/</sup> Hamer reports that the bill originally was written by the staff of Seattle Mayor Uhlman (42, p. 161).

and Congressman Thomas Ashley of Ohio. It would implement a unified Federal policy toward areawide planning bodies as recommended in 1973 by ACIR and in 1977 by the GAO (4, p. 253; 16, pp. 203-204; 17, pp. 31, 40; 42, p. 161; 83, p. iii; 95, pp. 29-30). Under the bill:

- (1) A single areawide planning agency in each substate region would be eligible for all federally aided areawide planning programs;
- (2) All federally aided areawide planning programs in each region would be melded into a single coordinated work program;
- (3) Federal aid projects in each region would be consistent with areawide growth and management planning; and
- (4) States' substate districts would be used for the administration of federally aided areawide planning programs (13, p. 22).

Yet another example is the 1977 USDA report on rural development policy issues which suggested consideration of the delineation of a single set of substate districts by the States and operation of all Federal development programs through these districts (79, pp. i-ii, 10, 12).

OMB in 1978 noted the continued proliferation of separate areawide planning agencies supported by Federal funds in its assessment study of Circular A-95 (88, p. 24). Moreover, the memorandum of agreement requirement under part IV of OMB Circular A-95 has proved of limited use in securing coordination of areawide planning (88, p. 29). OMB thus recommended that Federal agencies assisting areawide planning designate substate comprehensive planning agencies to carry out such planning except where prohibited by statute or where State or local governments object (88, pp. 6 exec. sum., 9-10, 29). OMB's general counsel advised that OMB has authority to make such a requirement (essentially the UMJO approach) where Federal program law does not provide otherwise (88, p. 29).<sup>16/</sup>

Even today the federally induced single-purpose regional organizations have their independence and narrowness tempered by the review and comment (A-95) procedures that force their requests for Federal funds through the multipurpose regional council (56, p. 123). Thus, there can be many types of organizational coordination. However, an A-95 review by an independent umbrella agency does not appear to offer the same opportunities for information exchange and tradeoffs as does piggybacking--even when the piggybacking only results from a committee structure being attached to the multipurpose regional council's board of directors to meet Federal requirements regarding board composition.

<sup>16/</sup> The UMJO approach is not without its critics or problems (41, pp. 76-78, 154-155, 266). Hallman, for example, favors the encouragement of areawide general-purpose governments instead of ACIR's concept of an UMJO (41, p. 266). He also is concerned about problems of achieving proper representation and the potential lack of accountability of an UMJO (41, p. 78). Moreover, in 1977, Walker, a supporter of UMJO's, wrote that the coalition that produced the UMJO approach in the early seventies "has come apart" due to State passivity, county ambivalence, and city independence (95, p. 23).

## REGIONALISM IN PERSPECTIVE

The growth of substate regionalism is sketched in this section from its earliest beginnings to the present time, with particular reference to the differences and problems of nonmetropolitan areas. Although substate regionalism in certain dimensions such as planning has a long history in the United States, it did not achieve much overall significance until the fifties. The sixties witnessed an acceleration of Federal activity supporting rapid expansion of substate regionalism that included support for both generalist and specialist types of regionalism. The seventies saw the continued growth of Federal activities supporting substate regionalism, but through relatively more programs that encouraged the growth of multicounty special-purpose units.

### Early Efforts Toward Regionalism

The history of regionalism is intertwined inextricably with that of planning (97, p. 15). Regional planning and areawide performance of public services can be traced to early town planning (11, p. 53). However, the most famous early comprehensive plan is the "Regional Plan for New York and Its Environs," a private undertaking sponsored by the Russell Sage Foundation, begun in 1921 and completed in 1929 (11, p. 54; 41, p. 67; 106, p. 286; 107, p. 432). County and metropolitan "regional" planning also began in other parts of the country during the twenties (11, p. 54).

The thirties saw the advent of more intergovernmental cooperation (104, p. 7). Intergovernmental service agreements were used and have continued to grow (57, p. 11; 69; 70; 107, pp. 438-450). Metropolitan planning organizations became fairly widespread with the expansion of Federal public works and relief programs (11, pp. 54-55).

Long-range regional planning continued to gain ground during the first half of the forties. These years also saw the creation of several new public regional planning bodies, and the formation or reactivation of a number of areawide citizen planning bodies (11, p. 55). Most public regional planning agencies up to this time were organized on a county basis and were constrained by a lack of resources. A number of private regional planning councils were formed in the forties and community participation in the planning process grew. However, on the negative side, the growth of planning during this period created severe problems of duplication, conflict, and overlap (11, p. 55). Thus, despite the long history of regionalism and planning, "public regional planning commissions and councils of governments are a recent phenomenon in the United States" (11, p. 53).

### The Fifties

The fifties saw considerable growth in substate regionalism with two events being especially significant. These were the respective beginnings of the COG movement and HUD's 701 program. The COG movement began in the Detroit area in 1954, when Edward Connor, a Detroit city councilman and president of the Wayne County Board of Supervisors, became concerned about the lack of common understanding about southeastern Michigan's metropolitan problems (9, p. 1; 38, p. 13; 41, pp. 68-69; 42, p. 160; 105, p. 430). He invited his counterparts from neighboring counties to meet to discuss mutual problems and their solution. Out of these meetings the Supervisor's Inter-County Committee (SICC) was formed with each county having equal representation and each county's representatives being chosen by its board of supervisors. SICC began to meet regularly and from this beginning the COG movement grew. By 1977 about 450 of the 675 regional councils were of the COG variety (59; 76, p. 3; 101, p. xiii).

## The 701 Program

Substate regionalism received a substantial impetus with the passage of the Housing Act of 1954 (P.L. 83-560) (8, p. 106; 11, pp. 56-58; 41, pp. 67, 69; 57, pp. 6, 13, 72-73, 95-96, 118, 120; 106, p. 287). Under section 701 of this Federal legislation, 50-50 matching grants were offered for planning on a metropolitan basis by official State, metropolitan, or regional planning agencies (11, p. 56; 41, p. 67). The original act has been amended numerous times (63).

Some of these amendments held special importance for the growth of substate regionalism. The Housing Act of 1959 extended 701 assistance to cities, counties, or groups of adjacent communities with populations of less than 50,000, as well as to State planning agencies carrying out statewide or interstate comprehensive planning (11, p. 57). The Housing Act of 1961 expanded financial assistance to metropolitan areas for the preparation of comprehensive plans by raising the 701 authorization from \$20 million to \$75 million and the maximum Federal contribution by one-half to two-thirds of planning costs (11, p. 59). The Housing Act of 1965 "was a major turning point making regional councils directly eligible for financial assistance" (8, p. 106; also see 16, p. 193). The Housing Act of 1968 extended the 701 program to cover non-metropolitan multicounty planning organizations (11, p. 73). This development represented a culmination of a series of developments that finally gave USDA considerable geographical jurisdiction over nonmetropolitan (non-SMSA) America (71, pp. 144-145, 163-166).<sup>17/</sup> In recent years, 701 funds have been reduced and redirected from general planning to specific land use and housing problem areas (16, p. 202; 63).

Therefore, the Federal Government's position in substate regionalism began to take shape during the fifties (11, p. 156). The growing level of Federal assistance that followed contributed to organizational complexities and administrative or managerial problems for participating State and local governments. Areawide planning and grant administration increasingly joined operating programs as important governmental functions. These earlier Federal activities toward areawide planning and grant administration utilized the carrot approach (the offering of funds as an incentive) for certain planning activities.

## The Sixties

The sixties witnessed a flurry of Federal actions affecting the growth of substate regionalism. Particularly important were those having a bearing on multipurpose regional councils. This would include such actions as the Public Works and Economic Development Act of 1965, the Appalachian Regional Development Act of 1965, the Model Cities Act of 1966, and OMB Circulars A-80 (1967), A-82 (1967), and A-95 (1969).

Federally funded regionalism grew rapidly in the early sixties. Under the Area Redevelopment Act (P.L. 87-27), industrial loan funds were targeted for areas of substantial and persistent unemployment or underemployment (50). Designated areas were divided into two groups in accordance with the criteria for designating areas provided in sections 5(a) and 5(b) of the act (50, pp. 55-60). Those 129 labor markets, most

<sup>17/</sup> Federal programs have been important initiators of regional activity, but Federal areawide programs and planning funds generally became available to nonmetropolitan regions later than they did to metropolitan areas. Prior to 1965, only the resource conservation and development (RC&D) program introduced areawide planning considerations in nonmetropolitan areas (11, pp. 242, 273). Thus, planning programs and requirements that could apply either in metropolitan or nonmetropolitan areas were all introduced in 1965 or later (11, p. 273).

of which in 1960 had a labor force of 15,000 or more including at least 8,000 nonagricultural workers, were termed 5(a) areas while the predominantly rural areas with a labor force of less than 15,000 were termed 5(b) areas (49, p. 91). The smaller 5(b) areas also were made eligible for public facility loans and grants (71, p. 135).

The Food and Agriculture Act of 1962 (P.L. 87-703) enabled USDA to form resource conservation and development districts (RC&D's) (58, pp. 23-24; 71, pp. 139-140, 180-181; 78). RC&D areas were sponsored by local units of government including counties, towns, and conservation districts (10, p. 28). RC&D councils and areawide comprehensive planning boards were required to coordinate their activities and occasionally they were one and the same entity (10, p. 28).

The Federal Highway Act of 1962 (P.L. 87-866) required the preparation of regional transportation and development plans and, in addition, the development of a continuous comprehensive planning process for all metropolitan areas of 50,000 or more population (103, p. I-24). More specifically, under its section 134, the Federal Government was not to approve funding of any projects in an urban area of more than 50,000 population unless it found that such projects were based on a continuing comprehensive transportation planning process carried on cooperatively by State and local communities (56, p. 125). According to Mogulof, the terms "continuing," "comprehensive," and "cooperative" became the watchwords of the transportation planning process, and in a number of instances resulted in the formation of new multijurisdictional agencies in urban areas able to conform to the intent of section 135 (56, p. 125). This legislation contributed not only to improved areawide planning efforts but also promoted the organization and operation of comprehensive regional councils, in some instances (41, p. 69; 56, pp. 125-126; 57, p. 13; 58, p. 2).

The Economic Opportunity Act of 1964 (P.L. 93-644) created new area organizations called community action agencies (CAA's) to plan and coordinate all poverty-related activities in the localities served. The Federal Government and the other participants gained considerable experience from the CAA's in the operation of a specialized, sometimes controversial, program that often had substate regional implications (7, pp. 46-63; 41, pp. 116-117; 56, p. 126; 71, pp. 32-78).

A number of the other Federal acts which began in the sixties also set up regional organizations. A large number of these new Federal program initiatives required the establishment of single-purpose multicounty organizations and districts that were largely clients of the Federal Government. Such direct Federal-State-local channeling of funds and activities by department or function without much coordination gave rise to the descriptive term "picket fence" federalism (7, pp. 6, 9-11, 16; 41, p. 266; 104, pp. 5, 10-16).<sup>18/</sup>

#### Economic Development Administration

The Public Works and Economic Development Act of 1965 (P.L. 89-136), which replaced the Area Redevelopment Act of 1961, authorized the Federal Government to participate with State and local programs to stimulate economic growth and create jobs in economically lagging areas. Under its title IV multicounty economic development districts (EDD's) encompassing distressed counties could be designated based on high unemployment, population loss, low median income, a sudden rise in unemployment, and economic stress in an Indian Reservation (10, p. 23; 56, pp. 126-127; 58, pp. 20-22).

<sup>18/</sup> Wright argued that the United States has experienced several successive phases of intergovernmental relations of which "picket fence" federalism is only one (104, p. 5). Walker recently noted some change in the Federal aid system that includes more horizontal contacts and flexibility and has coined the metaphor "bamboo fence" federalism (94, p. 17).

The districts were formed because individual distressed counties, known as "redevelopment areas" (RA's), lacked sufficient resources to form a solid foundation for growth and development (10, p. 23).

The key feature of the EDD concept was its growth center policy. The growth center strategy was based on the idea that a center's hinterland benefits from the spread of services, secondary jobs, and development expertise from the center, as well as opportunities made available to hinterland residents who commute or migrate to the core (10, p. 24). Some studies have found EDD growth centers largely unsuccessful or only minimally successful (10, p. 24; 72, pp. 415-419). EDA also utilized a "worst first" policy in its early existence. This policy targeted funds to those distressed areas that had the least potential for growth. This policy was unsuccessful and was ultimately discontinued (10, p. 24; 72, pp. 420-421).

What resulted is that the EDD's "took on COG-like characteristics because they included county and city officials along with other interests" (41, p. 69). They are generally regarded as having joined RPC's and COG's as species of regional councils (41, p. 69). Many of the EDD's are also located in nonmetropolitan areas (41, p. 69).

#### Appalachian Regional Commission

Another regional development plan was passed into law in 1965. The Appalachian Regional Development Act of 1965 (P.L. 89-4) created the Appalachian Regional Commission (ARC). The ARC is a Federal-multistate agency whose membership includes the Governors of the 13 States in the region and a Federal co-chairperson. The Governors designate the substate local development districts (LDD's) to administer ARC funds. The LDD's also conduct the A-95 review and are usually the substate units that administer other federally assisted areawide planning and development programs (10, p. 26; 58, pp. 22-23). Both the ARC and the EDA are inclined to focus on public works and area development as opposed to human resource development, though ARC does not do so to such a great degree.<sup>19/</sup>

Both the Public Works and Economic Development Act of 1965 and the Appalachian Regional Development Act have had an important bearing on the growth of regional councils (11, p. 71; 41, p. 69). Both acts had similar original goals in that they were intended to provide financial aid, as well as planning and technical assistance, to specific sections of the country experiencing high unemployment, out-migration, or low income (11, p. 71). While the former authorized the establishment of EDD's and the latter, LDD's, both substate regional units were in many ways similar.<sup>20/</sup> Each was intended to promote economic progress and to coordinate public and private planning and development efforts in their respective multicounty target areas (11, p. 71). The Federal Government was authorized to pay up to 75 percent of the administrative expenses of both the EDD's and the LDD's (63; 71, pp. 152, 156).

#### Model Cities

The Federal Government began to encourage better coordination of program activities affecting State and local governments in the midsixties. The stick (planning requirements) began to join the carrot (funds) (16, p. 192). By the end of 1965, the

<sup>19/</sup> Obviously, this had an important influence on the focus of the LDD's. Historically, both the LDD's and the EDD's have tended to focus on economic problems as opposed to the resource problems addressed by the RC&D's. For additional information on the history, purpose, operation, and performance of LDD's, see 64, pp. 150-157.

<sup>20/</sup> LDD's may also be recognized as EDD's by the Economic Development Administration (7, p. 32; 58, p. 23). Historically, in a majority of cases dual designation has been the practice.

era of voluntarism in the regional movement was drawing to a close (11, p. 71; 105, pp. 431-432).

The Demonstration Cities and Metropolitan Development Act (P.L. 89-754), signed on November 3, 1966, was the first evidence of this change in Federal policy. This act enabled the establishment of areawide planning agencies called city demonstration agencies (CDA's) or model cities in the SMSA's (71, pp. 91-92, 161-162). Section 204 of the act established a review and comment process involving applications by local governments in metropolitan areas for a variety of Federal grants for public facility construction projects (4, p. 249; 8, p. 106; 11, p. 72; 41, pp. 70, 118-119, 123-124; 57, pp. 5, 77-78; 88, pp. 1-3, 20; 101, pp. 41-42, 91-92; 106, p. 287). Thus, after June 30, 1967, all applications for over 30 Federal loan and grant programs would have to be accompanied by the comments of an official State or regional planning agency as to the relationship of the proposed project to the comprehensively planned development of the area (4, p. 252; 11, p. 141). The areawide planning requirement was controversial when it was added to the act in 1966. Nevertheless, the 204 requirement was "obliquely responsible" for the increase in the number of regional councils during the late sixties (101, p. 92). In fact, in 1971, the National Service to Regional Councils--forerunner to the National Association of Regional Councils (NARC)--called the Model Cities Act the single most significant Federal action to date for strengthening and encouraging regional councils in metropolitan areas (42, p. 161).

#### Circular A-80

OMB issued Circular A-80 on January 31, 1967, to improve coordination of federally assisted development planning covering multijurisdictional areas. The circular described in detail policies, objectives, and procedures for Federal agencies, State governments, and applicants seeking planning assistance. The circular had two objectives: (1) to encourage State and local development planning agencies to use common or consistent data bases and share facilities and resources and (2) to encourage the States to establish planning and development districts and to call for Federal agencies to use the district boundaries when assisting planning, unless clear justification existed for not doing so (83, p. 8; also see 11, pp. 190-192).

#### Circular A-82

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

Section 204 encouraged the development of multipurpose areawide groups, such as associations of governments or comprehensive metropolitan planning agencies, to coordinate federally assisted development affecting more than one jurisdiction. In metropolitan areas lacking such organizations, Governors were to designate an organization having competence in comprehensive planning to perform such functions until the local governments could develop their own organizations (83, p. 9; 88, p. 3). Under section 204's review and comment provision, most RPC's began to acquire a COG-like character with 50 percent or more of their membership composed of locally elected officials (97, p. 15).

Circular A-82 originally covered 36 Federal assistance programs administered by nine Federal agencies (84, p. 5). These programs were primarily concerned with

construction and physical facilities. Subsequently, A-82 was revised twice with the altered coverage eventually including 37 Federal programs (84, p. 5).

### Intergovernmental Cooperation Act

The Intergovernmental Cooperation Act of 1968 (P.L. 90-577) established a statutory basis for extending section 204's areawide review and comment procedure. Regulations issued to implement title IV of the 1968 act authorized establishment of State and nonmetropolitan clearinghouses to review applications for designated Federal grant programs in addition to the metropolitan review agencies designated under section 204 (4, p. 252; 11, p. 73; 27, p. 14; 41, p. 70; 57, pp. 5, 77; 88, pp. 1-3, 20; 101, p. 42; 103, pp. IV-1-IV-3). One major improvement in this act was that it covered both metropolitan and nonmetropolitan areas, according to McDowell (54, p. 6). Even though legal authority existed based on this act, actual application of it in nonmetropolitan areas may have been less than implied. For instance, Federal aid review and comment procedures did not become effective in nonmetropolitan districts until 1969 through A-95 (11, p. 273).

The 1968 act proclaimed a national policy of intergovernmental coordination and cooperation (84, pp. 3-4). Moreover, according to ACIR, the 1966 Model Cities Act and the 1968 Intergovernmental Cooperation Act "both have established a Federal policy favoring general purpose government, but many Federal programs still deal directly with special districts" (8, p. 106).

### Circular A-95

OMB Circular A-95, issued on July 24, 1969, "is a regulation designed to promote maximum coordination of Federal and federally assisted programs and projects with each other and with State, areawide, and local plans and programs" (89, p. 1). Its statutory basis is section 204 of the 1966 Model Cities Act and title IV of the Intergovernmental Cooperation Act of 1968 (89, p. 2). A-95 also incorporated and broadened circulars A-80 and A-82 (66, pp. 3-5; 83, p. 10; 88, pp. 2-3; 89, p. 2).

OMB's perception of the intent of the laws on which A-95 is based is "that the basic objective of A-95 is to foster intergovernmental cooperation by giving State and local governments an opportunity to influence Federal and federally assisted actions as they might affect State, areawide, and local plans and programs." (88, p. 3 exec. sum). It was not and is not intended as an advocate for individual policy programs (88, p. 3 exec. sum). The circular has four parts:

- (1) Part I establishes the Project Notification and Review System (PNRS), and is the best known and most influential of the four parts. Brown calls it "the primary element of the entire A-95 review process" (26, p. 6). PNRS is a means by which State, regional, and local governments are given the opportunity to review and comment on proposed applications for Federal grants that affect physical development and human resources. These units are to conduct a clearinghouse function. Part I now covers approximately 260 Federal programs as listed in the Catalog of Federal Domestic Assistance (86). The PNRS can strengthen the planning and decisionmaking capabilities of affected jurisdictions by impelling them to consider the impact of Federal programs on their jurisdictions. It can also enhance their ability to influence that impact. Part I superseded and amplified OMB Circular A-82 (7, p. 217; 88, p. 3).
- (2) Part II creates the framework for a similar review and comment system applicable to direct Federal development projects. A system is not prescribed, but use of the PNRS by Federal agencies is encouraged.

- (3) Part III gives Governors the opportunity to review and comment on State plans required under Federal programs. It encourages State comprehensive planning and gives the Governor and his generalist aides a means for influencing policies in individual agencies controlled by policy specialists.
- (4) Part IV provides for the coordination of Federal planning and development districts with State substate districts. It encourages States to exercise leadership in establishing a system of substate districts which can provide a consistent geographic base for planning and coordinating Federal, State, and local development programs (7, p. 249). It is closely related to Part I because, by encouraging States to develop systems of substate planning areas, it sets the stage for more complete geographic coverage of PNRS (89, p. 35). Part IV incorporated the policies outlined in A-80 without much change (83, p. 11; 88, p. 3).

OMB currently lists the following major participants in the A-95 review process: (1) applicants for Federal assistance; (2) Federal agencies which provide the assistance; and (3) clearinghouses along with their constituent governments and agencies which review the applications (88, p. 20). A-95 authorizes two types of clearinghouses: State and areawide (82, p. 9; 88, p. 4). State clearinghouses are designated by the Governor and are usually the State comprehensive planning agencies. Arawwide clearinghouses cover substate areas. (There are a number of interstate clearinghouses covering bi- or tri-State metropolitan areas.) Arawwide clearinghouses are usually part of comprehensive substate planning agencies. OMB designates areawide clearinghouses covering metropolitan areas in concurrence with the Governor (82, p. 9; 88, p. 4). The Governors, however, designate the areawide clearinghouses in nonmetropolitan areas (88, p. 4).

The general functions of the clearinghouses as authorized by A-95 are: (1) to evaluate the significance to State, areawide, or local plans of proposed Federal or federally assisted projects; (2) to notify appropriate local and State agencies of the applicant's intent to apply for Federal assistance, including those agencies authorized to develop and enforce environmental standards; and (3) to provide liaison between Federal agencies contemplating direct Federal development projects and the State or areawide agencies or local governments having plans or programs that might be affected by the proposed project (48, p. 3).

The original A-95 procedure affected 51 Federal programs, primarily in planning and direct physical development (4, p. 252; 11, p. 145; 40, p. 49; 84, p. 5; 101, p. 93). The list had been expanded to 100 programs by April 1971, including many focusing on social and human resources (4, p. 252; 11, p. 145; 40, p. 49; 48, p. 2). Coverage was extended to another 35 programs in November 1973, including adult and vocational education, health, job opportunity programs, and rural development (40, pp. 49-50). GAO reported coverage as of February 1975 at 138 Federal programs (84, pp. 20-21). The January 1976 revision extended coverage to 199 Federal programs (4, p. 252; 41, p. 137); about 260 assistance programs are now covered.

As noted, approximately 260 programs are listed in the Catalog of Federal Domestic Assistance (86). A single statutory or budgetary program may include several activities listed as separate programs in the catalog (88, p. 3). State-funded projects are not required to come under A-95 review (41, pp. 132, 136-137). The actual situation regarding clearinghouse review of State-funded projects thus depends on State authorities and actions.

There were 56 State and territorial and 555 areawide clearinghouses in May 1978 (524 were intrastate clearinghouses, 24 bi-State, and 7 were tri-State) (88, pp. 1

exec. sum., 4, 19). The 555 areawide clearinghouses covered 2,724 counties and 96 percent of the population (88, p. 4).

Major revisions of A-95 were issued February 9, 1971, November 13, 1973, and January 2, 1976 (27, p. 14; 89, p. 2). Substantive amendments were made March 8, 1972, and August 1, 1979 (82, p. 8). The most recent major revision on January 2, 1976, expanded PNRS under Part I to include a wider array of human resources programs in health, education, and employment (82, pp. 8-9). It also incorporated instructions for the new A-95 Standard Form (SF) 424 designed to insure that funding agency decisions will be sent to the State and regional clearinghouses from which the applications originate (26, p. 120). The August 1, 1979, amendment encouraged clearinghouses to evaluate the urban impacts of projects proposed for Federal assistance as part of the A-95 review process. The clearinghouses are to comment on the extent to which the proposed project would create a significant impact on central cities, older suburban cities, and other communities within their jurisdiction, including the relative impacts the project could have on one type of place compared with others. The several revisions were made to include civil rights and environmental concerns.

### The Seventies

Federal interest in substate regionalism increased during the seventies. During the decade there was much Federal legislation affecting substate regionalism. Some of it provided new authority for regional planning or service activities; of the 39 Federal programs identified here as supporting substate regionalism during 1977-79, 23 programs--just under 60 percent--were initiated during the seventies. In addition to these programs, another five programs were adopted to replace similar programs that originated in the sixties and others underwent major revisions.

Some of the most significant developments occurred in the health and social welfare area. Programs of support for planning, service coordination, and, in some cases, actual service delivery were adopted in the fields of aging, alcohol and drug abuse prevention, emergency medical services, and social services. In addition, major legislation created new programs for comprehensive health planning and employment planning and services, replacing similar programs that had been initiated in the late sixties. In 1975, the system of comprehensive health planning agencies (CHP's) was totally replaced by new health systems agencies (HSA's) with different geographic bases and greatly strengthened planning and coordinative powers. Just a year earlier, the Comprehensive Employment and Training Act (CETA) replaced the older cooperative area manpower planning system (CAMPS) with a new system of "prime sponsors" based mainly on large city and county boundaries and with planning for the "balance of State" conducted at the State level.

Several of the other new programs deal with the growing problems of environmental pollution. Planning grants were initiated for both air and water pollution control, for solid waste disposal planning, and, in 1978, for noise pollution control. A program of planning for coastal zone management was begun in 1973.

Nine new programs provide funding for community development activities. Of these, the five authorized by a 1974 amendment to the Public Works and Economic Development Act of 1965 are restricted to the regions of the country served by their respective title V regional action planning commissions (RAPC's). Another two programs provide support for activities of regional housing authorities, one predominantly in urban areas, the other outside of metropolitan areas. A program of aid to rural areas for comprehensive rural development planning was activated in fiscal year 1978. And a small program of discretionary grants to regional councils under the community development block grant program was begun in mid-decade.

Federal support for comprehensive planning and planning for physical development programs underwent significant changes during the seventies. The Housing and Community Development Act of 1974 replaced many of HUD's categorical grants, including planning for water and sewer facilities, with a new program of block grants to individual cities and "urban counties." The same act redirected the 701 comprehensive planning assistance program to give more emphasis to housing and community development policies and less attention to planning of a more general nature. Since that time, 701 planning grants to cities and counties have been phased out, and these governments must now rely on their community development block grants.

Two recent programs were enacted to deal with the environmental, social, and economic consequences of energy developments. A 1976 act created a program to deal with the effects of offshore drilling on coastal areas. A second program, added in 1979, extended Federal concern to all communities significantly affected by employment from energy-related development.

Transportation programs were added during the seventies to support areawide planning for mass transportation in rural areas and for airport systems planning. In addition, the amounts available for highway planning were significantly expanded during this period.

With but a few exceptions--the aging and water pollution control programs being the primary ones--the larger programs, the ones that promise to remain the major sources of support for substate regionalism, had their roots in the sixties or before. Many of the programs adopted in the seventies provided relatively small shares of funding compared with their earlier counterparts. Likewise, many of the newer programs were limited to rather specific issues, while the older programs tended to assist "comprehensive" planning. Few of the programs--again, aging and water pollution control are the chief examples--attempted to support regional activities throughout the Nation. Most, such as the title V regional commission programs, were limited to a single region of the country, to a select group of areas (coastal zones, energy-impacted areas, or rural areas), or to a limited number of projects. And finally, many of the programs were expected to provide aid only for a limited period of time. These included the solid waste planning grant program and several of the title V regional commissions.

Despite the continuing high level of Federal Government interest in substate regionalism, the actions of the seventies present no clear signals regarding a consistent Federal regional policy. While most of these new programs support planning for a single function and many encourage the creation of new, single-function planning organizations, their enactment does not signify an unambiguous shift in Federal policy away from support for comprehensive areawide planning agencies. To be sure, the social policy planning programs have tended to create new regional agencies or to assist existing organizations not historically endowed with comprehensive physical development planning functions; as a result, the number of areawide planning agencies proliferated during the seventies. However, activities under new physical policy programs, such as air pollution control planning, coastal zone, rural mass transit, solid waste management, and 208 water quality planning programs, are frequently channeled through comprehensive planning agencies, as are those of some of the new social policy programs. In addition, a small but growing number of social policy programs are piggybacked on community mental health agencies or, increasingly, on health systems agencies.

Thus, despite the abundance of Federal actions respecting substate regionalism, they have failed to yield any single consistent trend. From these developments, as Walker notes, emerges "a confused picture of several Federal substate regional 'policies,' not one, and of overall ambivalence regarding the proper future direction" (95, p. 26).

## PRESENT PROGRAMS

A large number of Federal programs support various types of planning programs. For example, a 1977 OMB study identified 162 Federal assistance programs in 17 Federal agencies which imposed planning requirements as a condition for receiving Federal assistance (87, p. 1). Of the 162 programs, 99 had planning requirements at the State level, 25 at the areawide level, and 38 at both levels (90, p. 236). Thus, only a portion of Federal planning programs support multicounty substate planning and development activities.

There have been several attempts to identify those Federal programs specifically supporting substate regional activities. The most recent of these, published by ACIR in June 1977, identified 32 Federal programs that encouraged or supported substate regional activities as of December 1976 (12, pp. 11-19). Twenty-one of the programs supported the formation of regional multicounty bodies (5, p. 21; 95, p. 22). All but 2 of the 32 programs were for specific functional purposes (5, p. 21; 14, p. 54). Thus, 30 of the 32 programs supported functional planning, although in a number of cases, the multipurpose areawide body was asked to review and comment on local applications for grants in the functional field (5, p. 22; 14, p. 54).

This report summarizes the results of the most recent study of Federal programs, which keys on the 1977-79 time period (63). The study differs from earlier efforts in two principal respects. First, it involves all Federal programs supporting or encouraging substate regional activities; it is not restricted to programs that support planning (as opposed to service delivery) or to programs mainly intended to assist regional councils or other comprehensive planning agencies. And second, it uses a specific set of criteria to identify substate regional programs. Previous studies that have identified Federal planning and development programs supporting substate regionalism typically have not specified the criteria for selecting such programs from among the entire Federal program array. To overcome this major deficiency and be more specific, the researchers attempted to develop specific selection criteria in the study.

The identification of Federal programs supporting or setting up substate regionalism is not easy under any well-constructed set of criteria. There are a number of difficulties with which one must cope, not the least of which is the dynamism of the programs themselves. Thus, observation of the number of programs over time results in the reporting of net figures that stem from expiration or repeal of earlier program authorizations as well as additions of new authorizations.

Thus, previous studies reflect the fact that the exact number of programs varies, not only with the time during which they were conducted, but also with how the programs were classified and combined and with the type of audience the studies address. For example, a 1978 ACIR study listed four Federal planning programs in 1962; 17 by 1972; and 19 by 1977 (17, pp. 6-7). This apparent discrepancy with the 1977 ACIR study already cited resulted from combining such programs as those of the several title V commissions into a single line item in the 1978 study. Another count reported 20 Federal programs as encouraging substate areawide programs in 1976 (8, p. 106; 41, pp. 75, 138).

### Selection Criteria

Several criteria were considered in selecting programs for inclusion in this analysis: (1) whether the Federal program led to the creation of substate regional organizations or provided assistance essential to their continued existence; (2) the extent to which the program assists activities on a multicounty basis; (3) whether the multicounty organizations are locally controlled; (4) whether the program assists

planning and development activities; and (5) whether the assisted organizations are expected to be continuing. Because the programs meet these criteria to differing degrees, additional comment is merited.

### Federal Connection

The primary focus of this study is on Federal programs which support the creation or continuance of multicounty planning and development activities. The programs examined, for the most part, provide for the creation of institutions to engage in planning and development or they support the conduct of these activities by existing organizations. Most of the programs involve a direct financial and programmatic link between the Federal Government and the multicounty districts; however, some programs, such as local planning funds under the Older Americans Act, pass the financial aid through State governments. This administrative arrangement does not disqualify a program from consideration. Another program--A-95 project notification and review--provides no financial support to multicounty agencies but is included because of the coordination powers it confers on comprehensive planning agencies. Some programs, such as the alcohol and drug abuse formula grants, were not designed as a source of funds for substate regional planning organizations but have been used as such by some States. Finally, the study also extends to some programs which, while they neither establish nor provide continuing Federal support for multicounty planning agencies, do provide an additional source of support for them from time to time. Examples are the excess property, historic preservation, and intergovernmental personnel programs.

### Multicounty Area Focus

All of the programs included here provide some support for activities conducted on a multicounty substate basis. Thus, programs supporting planning only in areas the size of one county or less are omitted. Some of the Federal programs examined, such as the community action program, do support some planning in areas smaller than a county; however, the areas they support are usually larger than one county and they are included for this reason. While most of the planning areas assisted under the programs are contained within a single State, some cross State boundaries. This does not disqualify the program as a "substate" program for the purposes of this study.

### Planning and Policy Development Focus

Even though each program supports planning, coordination, or policy development, the programs collectively extend to a broad range of specific activities. A large number of them stress preparation of formal plans, and many make regular revision of a plan a condition for receiving assistance; included are such functions as economic development, employment, environmental protection, health, housing, land use, and transportation. Other programs place less emphasis on formal planning than on providing a focal point for community economic development activities: aging, community action, and resource conservation and development programs are examples. And still others, such as alcohol, community mental health, drug, and emergency medical services programs, are intended to support agencies which coordinate service delivery on a regional basis. Despite these differing emphases, however, the programs have an underlying similarity: each in some way enhances the institutional capacities of local areas to develop their own policies and to provide services on an efficient basis.

### Local Control

The multicounty organizations supported by these Federal programs are locally controlled by a governing board composed of local government or other local membership

and staffed by local employees.<sup>21/</sup> Locally controlled regional organizations differ from multicounty areawide planning and service delivery operations that are conducted by State governments within State administrative regions using State government officials, rather than local employees, as staff. Some of the programs included in this study, such as the comprehensive employment and training program (CETA), support both of these institutional arrangements, sometimes even within a single State. State governments conduct a significant amount of areawide planning, especially in nonmetropolitan areas. However, the main focus of this study is on locally controlled planning, and, while the study includes some programs which aid State-conducted areawide planning, it does not include any which assist State-conducted planning exclusively.

#### Continuing Nature

A final feature of the programs included here is that they support areawide planning and development organizations and activities that are expected to continue. However, despite the continuing nature of the agencies they support, some of the programs included provide only temporary assistance for special activities rather than a regular source of support for the agencies' ongoing functions.

#### Programs Identified

Based on these criteria, the 39 Federal programs supporting substate regional activities during 1977-79 were identified (table 1). The identifications were made after contacts with the administering Federal agencies and extensive analysis of the programs. The program analyses have been published elsewhere (63). With exceptions noted, the authors believe that the 39 programs include all those that encourage multicounty substate regional activities or that provide regular and major support for regional agencies with a planning and policy development focus.

The period under study begins with 1977 to match the special survey of substate regional organizations conducted by the U.S. Bureau of the Census as part of the 1977 Census of Governments (76). The study period is continued to 1979 to bring the list up to date and also to provide a multiyear analysis of the complex phenomena of Federal substate regional programs. Because of changes in Federal support for substate regionalism, fewer than 39 programs were operating at any time during the 3-year period. One program funded and operating in fiscal years 1977 and 1978 was no longer providing assistance in 1979; however, seven programs that were operating in 1979 were not funded in 1977. Another program was funded in 1977 and 1979, but not in 1978.

The study excludes any education programs of the U.S. Department of Education that assist the regional educational service agencies already established in a number of States. These programs are not included as the regional education agencies are largely financed from State and local sources and the Federal programs tend to form an incidental source of aid to the agencies. In addition, the agencies were for the most part created as the result of State and local, rather than Federal, initiative.<sup>22/</sup>

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<sup>21/</sup> A partial exception is USDA's RC&D program, which provides a "project coordinator" who is a Federal Government employee to staff each RC&D district. The presence of the Federal project coordinator, however, does not mean that there is not a substantial degree of local control over each RC&D area's activities.

<sup>22/</sup> This does not mean that all Federal regional support activities for education are necessarily excluded from consideration. For example, the Appalachian Regional Commission (ARC) has assisted--in addition to its other activities--in the creation and operation of regional education service agencies (RESA's).

Table 1--Federal programs supporting substate regional activities, 1977-79

Number, function, and program name 1/	CFDA : number 2/	Federal : agency 3/	Areawide : agency 4/	Classification : code 5/
<b>Rural development:</b>				
1. Area Development Assistance Planning Grants (Section 111)	10.426	USDA/FmHA	Varies	2
2. Rural Rental Assistance Payments	10.427	USDA/FmHA	Varies	3
3. Energy Impacted Area Development Assistance (Section 6)	10.430	USDA/FmHA	Varies	2
4. Resource Conservation and Development (RC&D)	10.901	USDA/SCS	RC&D Council	1
<b>Community and economic development:</b>				
5. Economic Development District Program	11.302 11.303 11.306	Commerce/ EDA	Economic Development District (EDD)	1
6. Section 8 Housing	14.156	HUD	Areawide Planning Organization (APO) and others, such as Regional Housing Authority.	3
7. "701" Planning Assistance	14.203	HUD	Areawide Planning Organization (APO)	1
8. Community Development Block Grants	14.218 14.219	HUD	Varies	3
9. Historic Preservation Grants	15.411	Interior/ Heritage Conservation and Recreation Service	Varies	3
10. Appalachian Regional Commission Assistance	23.009 23.011 23.012	ARC	Local Development District (LDD)	1

See footnotes at end of table.

Continued

Table 1--Federal programs supporting substate regional activities, 1977-79--Continued

Number, function, and program name 1/	CFDA : number 2/	Federal : agency 3/	Areawide : agency 4/	Classification : code 5/
Title V economic develop- ment commissions: 6/				
11. Coastal Plains Technical and Planning Assis- tance	28.002	Coastal Plains Regional Commission	Varies	2
12. Four Corners Tech- nical and Planning Assistance	38.002	Four Corners Regional Commission	Varies	2
13. Upper Great Lakes Technical and Planning Assis- tance	63.002	Upper Great Lakes Regional Commission	Varies	2
14. Old West Technical and Planning Assistance	75.002	Old West Regional Commission	Varies	2
15. Pacific Northwest Technical and Planning Assistance	76.002	Pacific Northwest Regional Commission	Varies	2
Environmental protection:				
16. Coastal Zone Management Pro- gram Development (CZMP)	11.418	Commerce/ NOAA	Varies	2
17. Coastal Energy Impact Program	11.421 11.422	Commerce/ NOAA	Varies	2
18. Air Pollution Con- trol Program Grants	66.001	EPA	Varies	2
19. Quiet Communities	66.030 66.031	EPA	Varies	2
20. Water Pollution Control Planning Grants	66.426	EPA	208 Agency	2
21. Solid Waste Planning Grants	66.451	EPA	Varies	3

See footnotes at end of table.

Continued

Table 1--Federal programs supporting substate regional activities, 1977-79--Continued

Number, function, and program name 1/	: CFDA : number 2/	: Federal : agency 3/	: Areawide : agency 4/	: Classification : code 5/
<b>Transportation:</b>				
22. Airport Planning Grants	20.103	DOT/ FAA	Metropolitan Planning Organization (MPO)	2
23. Highway Aid Program	20.205	DOT/UMTA	Metropolitan Planning Organization (MPO)	1
24. Mass Transportation Technical Studies Grants	20.505 20.509	DOT/UMTA	Varies	2
<b>Health and social services:</b>				
25. Alcohol Formula and Project Grants	13.252 13.257	HHS	Varies	2
26. Drug Abuse Preven- tion Formula Grants	13.269	HHS	Varies	2
27. Emergency Medical Services	13.284	HHS	EMS Systems Agency	2
28. Health Planning-- Health Systems Agencies	13.294	HHS	Health Sys- tems Agency (HSA)	1
29. Community Mental Health Centers	13.295	HHS	Community Mental Health Center	1
30. Special Programs for the Aging	13.633	HHS	Area Agency on Aging (AAA)	1
31. Title XX Social Services	13.642	HHS	Varies	2
32. Comprehensive Employment and Training Programs (CEITA)	17.232	Labor	Prime Sponsors; Consortia	1
33. Highway Safety Program	20.600	DOT	Varies	3

See footnotes at end of table.

Continued

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Table 1--Federal programs supporting substate regional activities, 1977-79--Continued

Number, function, and program name 1/	: CFDA : number 2/	: Federal : agency 3/	: Areawide : agency 4/	: Classification : code 5/
34. Community Action	49.002	CSA	Community Action Agency (CAA)	1
Protective services:				
35. Law Enforcement Assistance--Com- prehensive Plan- ning Grants (LEAA Part B) 7/	16.500	Justice/ LEAA	Regional Planning Unit (RPU); Criminal Justice Coordinating Council (CJCC)	1
36. Juvenile Justice and Delinquency Prevention 8/	16.516	Justice/ LEAA	Regional Planning Unit (RPU); Criminal Justice Coordinating Council (CJCC)	1
General purposes:				
37. Project Notifica- tion and Review Process (A-95)	--	OMB	A-95 Areawide Clearinghouse	1
38. Intergovernmental Personnel Grants	27.012	ORM	Varies	3
39. Excess Property Program	39.003	GSA	Varies	3

1/ Either the Catalog of Federal Domestic Assistance (CFDA) or commonly accepted name for the program (86). Names selected for brevity.

2/ Numbers based on the 1979 Catalog of Federal Domestic Assistance (CFDA) (86).

3/ Sponsoring or funding Federal agency.

4/ Name of substate regional agency receiving the Federal assistance and administering the program.

5/ The importance of these programs for creating and supporting substate regional organizations varies greatly. The programs have been classified into several categories according to the nature of their support for substate regional activities as follows:

Code

Description

- (1) Create Substate Areawide Organizations: Includes programs that encourage or mandate the creation of a particular set of substate regional organizations and which provide rules regarding such items as their operation, functions, and composition. Funding is expected

to be available on a continuous basis. Piggybacking onto other programs is often difficult or impossible. Piggybacking refers to the use of existing substate regional organizations--particularly multi-purpose regional councils--by other Federal programs of a single-purpose functional nature to administer their activities.

- (2) Support Substate Areawide Organizations: Includes programs that provide funds for planning, operations, and related substate regional organization administrative expenses. Programs can be and usually are piggybacked onto others. Funds may not be available continuously beyond an initial startup period.
- (3) Limited Support for Areawide Organizations: Includes programs that provide support to substate regional organizations for operations other than planning or administrative costs or which provide assistance other than funding to substate regional organizations. Includes programs that are infrequent or minor sources of financial aid to areawides and whose primary purpose is other than to establish or maintain a system of regional organizations.

6/ This list includes only 5 of the 11 title V commissions. Six commissions either have chosen not to support substate regional administrative and planning activities or are too new to have done so during 1977-79. See "Programs Identified" section of this report.

7/ This program was replaced in fiscal 1980 by a new program titled Criminal Justice--Part D Formula Grants. The new program is numbered 16.530 in the 1980 Catalog of Federal Domestic Assistance (CFDA).

8/ This program was renumbered 16.540 in the 1980 Catalog of Federal Domestic Assistance (CFDA).

The 39 programs include those operated by five title V regional action planning commissions. While the Public Works and Economic Development Act of 1965 (P.L. 89-136) authorized all current and future commissions to make administrative expense and planning grants to substate districts, only 5 of the 11 commissions had chosen to do so as of 1977-79. Two of the commissions with well-developed programs (New England and Ozarks) chose not to make such grants.<sup>23/</sup> Four other commissions (Southwest Border, Mid-America, Mid-Atlantic, and Mid-South) either have not fully developed their programs or have not yet decided whether they will make such grants.<sup>24/</sup> In addition, two commissions (Old West and Upper Great Lakes) have funded substate regional administrative and planning activities for only a limited period of time and have discontinued their support recently.<sup>25/</sup>

### Program Characteristics

This section describes some of the major characteristics which differentiate the 39 programs.<sup>26/</sup> Despite the common features which underlie their selection for this analysis, the programs are in fact somewhat heterogeneous. They vary widely in terms of their purposes, levels of funding, longevity, continuity, and their importance to the areawide organizations they support. Some programs, such as HHS's assistance to health systems agencies (HSA's), not only provide important financial aid for regional planning but are also instrumental in establishing the organizations and lay down particular rules regarding their structure and operations. Others, such as the Intergovernmental Personnel Act (IPA) grant program, are not intentionally regional in focus, although they do finance certain activities conducted by regional councils and thus comprise a part of the total support pattern.

The programs also differ in the substantive areas they assist. Some, such as HUD's 701 comprehensive planning assistance program, extend to such a broad range of policy development and management issues that they can properly be termed generalist in focus. By contrast, many of the programs, such as the DOT's urban mass transit program, are limited to a highly specific set of purposes; these programs are better described as functionalist in both origin and focus.

### Functions Assisted

The 39 programs listed in table 1 are grouped into 7 broad functional categories. The largest number of programs (11) support a variety of community and economic development activities. Closely related are 4 programs with a rural development focus,

<sup>23/</sup> These commissions were organized on March 20, 1967, and September 7, 1966, respectively.

<sup>24/</sup> The Southwest Border region was designated by the Secretary of Commerce on October 23, 1976, and the charter meeting of the commission was held on August 8, 1977. No substate district administrative or planning support has been given by the Southwest Border Regional Commission. The Secretary of Commerce designated three new economic development regions on January 9, 1979. They are: (1) the Mid-America region, comprising Illinois, Indiana, Iowa, and some Ohio counties; (2) the Mid-Atlantic region comprising Delaware, New Jersey, and certain counties in Maryland, New York, and Pennsylvania; and (3) the Mid-South region, comprising certain counties in Alabama, Kentucky, Mississippi, and Tennessee. Each of these was too new to have been a factor in providing substate districts with administrative or planning support in 1977-79.

<sup>25/</sup> These commissions were organized on August 18, 1972, and April 11, 1967, respectively.

<sup>26/</sup> The treatment of the characteristics will be relatively brief; a fuller discussion is available elsewhere (63).

making a total of 15--nearly two-fifths of all the programs--which focus on this policy area.

The second largest in number is the group of 10 programs dealing with a wide range of health and social service activities. Next in size are two groups of predominantly urban-oriented programs--environmental protection and transportation. Two additional programs provide grants for planning in the criminal justice and law enforcement area, and three programs support general functions or provide aid which cannot be readily classified with any single function.

The programs can also be divided into two broad categories--those involving the development and management of the physical environment, and those related to the health and welfare of the American population. The 22 physical policy programs tend to deal with issues of population or economic growth or with managing the consequences of it. The economic development district program, for instance, helps depressed areas expand their economic base and creates new job opportunities by stimulating business investment. The resource conservation and development (RC&D) program is also oriented toward economic growth, but approaches the issue by encouraging the most effective use of a rural area's natural resources. Historically, the 701 comprehensive planning assistance program has covered issues related to the development of the physical environment, including community development, land use, and transportation planning. The Appalachian regional development program, which is similar, covers an even broader range of issues, including education and health. Other physical policy programs involve community development, environmental protection, housing, and transportation planning.

The 12 social policy programs also encompass a wide range of activities. The largest subset relates to health and physical well-being, central within it the HSA program, which assists health care planning. Other programs focus on narrower aspects of health policy--alcohol and drug abuse prevention and treatment, community mental health, and emergency medical services planning. The remaining social policy programs treat a variety of functions--aging, community action, criminal justice, employment, highway safety, and social services.

Five programs cannot be classified as physical or social. Appalachian regional development and section 8 housing explicitly support both physical and social welfare programs. Three others--which support general functions--cannot be tied to any single policy classification as they aid a broad range of activities.

#### Organizations Supported

The programs can also be distinguished according to the extent to which they support generalist, multipurpose regional organizations or single-purpose, functionally specific, organizations. The programs are classified in table 2 according to whether support for either type of organization can be considered a primary or secondary focus of the program. Thirty-one of the programs support generalist organizations, and for 21 of them, this is a primary focus of the program. Sixteen programs emphasize generalist organizations exclusively. Twenty-three programs support functionally specific organizations. Nearly all of these programs (19) have this as their primary focus.

There are important differences between the physical policy and the social policy programs in their tendencies to support the general purpose organizations as opposed to more functionally specific regional bodies. Nearly 80 percent of the physical policy programs primarily support generalist organizations, and well over half the programs limit their support to these organizations. Only about 40 percent of the physical policy programs place any emphasis on special-purpose organizations and for half of these that emphasis is only secondary. The five programs aiding both physical

Table 2--Classification of Federal programs supporting substate regional activities by generalist and functionalist focus

Number, function, and program name	Support generalist, multipurpose organizations	Support special purpose areas (functionalist, single-purpose organizations)
<u>Primary "P" and secondary "S" focus of program 1/</u>		
<b>Rural development:</b>		
1. Area Development Assistance Planning Grants (Section 111)	P	--
2. Rural Rental Assistance Payments	--	P
3. Energy Impacted Area Development Assistance (Section 601)	P	--
4. Resource Conservation and Development (RC&D)	S	P
<b>Community and economic development:</b>		
5. Economic Development District Program	P	--
6. Section 8 Housing	S	P
7. "701" Planning Assistance	P	--
8. Community Development Block Grants	P	--
9. Historic Preservation Grants	P	--
10. Appalachian Regional Commission Assistance	P	--
Title V economic development commissions: <u>2/</u>		
11. Coastal Plains Technical and Planning Assistance	P	--
12. Four Corners Technical and Planning Assistance	P	--
13. Upper Great Lakes Technical and Planning Assistance	P	--

See footnotes at end of table.

Continued

Table 2--Classification of Federal programs supporting substate regional activities by generalist and functionalist focus--Continued

Number, function, and program name	Support generalist, multipurpose organizations	Support special purpose areas (functionalist, single-purpose organizations)
<u>Primary "P" and secondary "S" focus of program 1/</u>		
14. Old West Technical and Planning Assistance	P	--
15. Pacific Northwest Technical and Planning Assistance	P	--
Environmental protection:		
16. Coastal Zone Management Program Development (CZMP)	P	S
17. Coastal Energy Impact Program	P	S
18. Air Pollution Control Program Grants	S	P
19. Quiet Communities	P	--
20. Water Pollution Control Planning Grants	S	P
21. Solid Waste Planning Grants	S	P
Transportation:		
22. Airport Planning Grants	P	--
23. Highway Aid Program	P	S
24. Mass Transportation Grants	P	S
Health and social services:		
25. Alcohol Formula and Project Grants	S	P
26. Drug Abuse Prevention Formula Grants	S	P
27. Emergency Medical Services	--	P

See footnotes at end of table.

Continued

Table 2--Classification of Federal programs supporting substate regional activities by generalist and functionalist focus--Continued

Number, function, and program name	: Support generalist, multipurpose organizations	: Support special purpose areas (functionalist, single-purpose organizations)
<u>Primary "P" and secondary "S" focus of program 1/</u>		
28. Health Planning-- Health Systems Agencies	--	P
29. Community Mental Health Centers	S	P
30. Special Programs for the Aging	S	P
31. Title XX Social Services	--	P
32. Comprehensive Employ- ment and Training Programs (CETA)	--	P
33. Highway Safety Program	--	P
34. Community Action	--	P
Protective services:		
35. Law Enforcement Assistance--Comprehen- sive Planning Grants (LEAA Part B)	S	P
36. Juvenile Justice and Delinquency Pre- vention	S	P
General purpose:		
37. Project Notification and Review Process (A-95)	P	--
38. Intergovernmental Personnel Grants	P	--
39. Excess Property Program	P	P

1/ Dashed line indicates that the support is either extremely limited (negligible) or that the item is not applicable, e.g. program not yet funded.

2/ This list includes only 5 of the 11 title V commissions. Six commissions either have chosen not to support substate regional administrative and planning activities or are too new to have done so during 1977-79. See the "Programs Identified" section of this report.



and social policies are quite similar to the physical policies in this respect, with four having a primary focus on general organizations and only two having any emphasis at all on functionally specific organizations.

However, the social policy programs tend to be directed toward unique or more limited purpose organizations. All 12 of the social policy programs primarily focus on these organizations, 7 of them exclusively. Only 5 of the 12 place even secondary emphasis on the use of general-purpose regional organizations.

#### Areas Served

Not all of the 39 programs are available for use throughout the entire Nation. Limitations apply to area eligibility for support; these restrict nearly 40 percent of the programs to either a single region or to substate areas that meet special criteria.

Eight of the programs limit eligibility to specified regions of the country. The primary example is the Appalachian Regional Commission's assistance to substate organizations within the 13 States served by the commission. Of the remaining programs, the most numerous are the five title V regional action planning commissions that have chosen to implement their authority to provide administrative expense grants to substate districts within their jurisdictions. In addition, two programs--the coastal energy impact program (CEIP) and coastal zone management program (CZMP) limit eligibility to States bordering on the oceans or the Great Lakes.

Ten programs restrict eligibility to substate areas meeting other criteria. Three of the programs--airport systems planning grants, highway planning grants, and section 175 air pollution control planning grants--are limited mainly to urbanized areas or to SMSA's. Three other programs are limited to rural areas. Both the rural rental assistance program and the section 111 area development assistance program are restricted to areas outside SMSA's; the resource conservation and development program is limited to approved areas, which in practice have mainly been rural in character.

Four programs have restricted eligibility to areas meeting certain program-related criteria. The two coastal zone programs are limited to the coastal portions of eligible States; the coastal energy impact program (CEIP) is further limited to those coastal areas affected by energy developments. An inland counterpart to the CEIP is the section 601 energy-impacted area program, which is restricted to areas experiencing energy-related employment growth. Finally, the economic development district program is limited to substate regions containing local areas with depressed economies.

#### Continuity of Support

The 39 programs differ in their importance to substate regional activities. One measure of this is the continuity of the financial aid they provide for those activities. Eighteen of the programs, or about 45 percent, provide relatively continuous support for regional organizations, thereby enabling them to carry on their activities on a relatively permanent basis. Half of these programs deal with physical policy and include several programs (Appalachian Regional Commission, 701 comprehensive planning assistance, highway and mass transit planning, and RC&D) that have regularly supported substate organizations since the midsixties or before. The remaining social policy programs include support for aging programs, alcohol and drug abuse planning, community action, comprehensive health planning, criminal justice planning, employment, and social services.

Of the remaining programs, 16 fund only limited activities of short duration, rather than providing general support for particular organizations. Four others

provide only startup funding which is phased out after a specified number of years. Two of these programs--community mental health and emergency medical services--are intended to establish special regional organizations to deal with these functions. The others seek only to initiate particular planning functions within existing organizations.

### Agency Designations

Eighteen of the programs designate particular organizations as being eligible for their support. Ordinarily, various rules are required to be met by the organizations before they can receive such designations; these are discussed below. Many of the designated agencies are known by particular titles--areawide planning organizations, community mental health centers, economic development districts, and health systems agencies are examples.

For the most part, programs that make agency designations also provide continuous financial support for them. There are some exceptions, however. Two of the programs--community mental health and emergency medical services--provide funds for a few years to enable the agencies they create to begin operations and establish a local base of support. Two others--airport systems and solid waste planning grants--provide funds for specific projects of limited duration, and once these are completed the funds are withdrawn. The A-95 project notification and review program provides for the official designation of regional clearinghouses but provides no financial assistance. However, five programs--alcohol and drug abuse planning, social services, and the Coastal Plains and Pacific Northwest regional commissions--have provided relatively continuous funding, even though none grants the agencies any special designation or official recognition.

### Boundary Criteria

Twenty-four of the programs set down some criteria regarding the definition of the regions that are to be served by the agencies receiving the assistance. Twelve of the programs require that the areawide boundaries must conform to the State-designated substate regional boundaries. Seven require that the regions may not be drawn so as to divide any SMSA.

Several programs attempt to regulate the population size of the regions. Ten of the programs set minimum population levels for the regions, and two--the community mental health and comprehensive health planning programs--also establish a maximum population size. Three others require a minimum size for the target population served by the program. Five programs have other criteria regarding regional boundaries.

### Governing Board Composition

Twenty-four programs have requirements regarding the composition of the governing boards of the organizations they assist. Fifteen of the programs require some representation of public officials on the governing boards of the regional agencies. Eleven programs set a minimum proportion of public officials to be represented (usually a majority) and one program--the economic development district program--specifies a maximum (two-thirds). Four programs require public official representation but do not specify a percentage.

Eleven programs require that members other than government officials be on the governing board, although these requirements may vary greatly. Many programs impose requirements that the board be representative of the communities they serve (such as civic, economic, ethnic, fraternal, governmental, or religious interests). In most cases these requirements are defined in general terms, without specifying the exact

manner in which the representative balance is to be achieved. In other cases, numerical quotas are established. The comprehensive health planning program, for example, requires that between 50 and 60 percent of the board members be health care consumers. The remainder must be health care providers and one-third of these must be direct providers. The community mental health program has similar, although less elaborate, requirements.<sup>27/</sup> Another five programs encourage, but do not require, the inclusion of government officials or other specified categories of representatives on governing boards.

## CONCLUSIONS

Substate regionalism as it exists today is a relatively recent phenomenon, although its roots date back to the twenties and perhaps even further. The history of Federal aid for regional planning dates from 1954, when the 701 comprehensive planning assistance program was enacted. However, there was relatively little Federal activity until the sixties, when a number of significant programs were adopted in the fields of economic development, employment, health, law enforcement, and transportation. These programs provided an important basis for current Federal policies toward substate regionalism. USDA, which is one of the Federal agencies supporting multicounty substate regional activities, was also one of the leaders in promoting regional solutions to the problems of rural development and natural resource conservation.

Faced with differing problems and motivated by differing objectives, substate regional organizations developed in different ways and at a slower pace outside the Nation's urban centers. Not only do nonmetropolitan regional councils serve larger territories and smaller populations, but there are also differences in the governmental structures with which they must deal, the social characteristics of their constituencies, and the range of problems faced. Inevitably these differences led to variations in the way metropolitan and nonmetropolitan regional councils function, the tasks they undertake, and the degree of support enjoyed. Yet, as this report has shown, substate regional organizations fulfill important roles in nonmetropolitan areas and hold much promise for meeting their special needs.

The substate regional movement raised important controversies. This report has reviewed several, in particular, the tension between policy generalists and single-issue specialists or functionalists, and the issues surrounding attempts to consolidate special substate regional agencies into umbrella units. There are, of course, many other issues that have been considered in more detail elsewhere (66; 67).

Federal policy regarding regionalism in the late sixties and seventies was characterized by two contrasting, and sometimes competing, trends. Beginning in the late sixties, the Federal Government encouraged efforts to coordinate programs regionally by establishing a network of A-95 regional clearinghouses to review them. Later attempts were made to encourage the Federal agencies that were establishing substate planning regions to use the regions already delineated by the various States.

In contrast to the trend favoring comprehensive planning and policy generalists, there has been a continued growth of special-purpose programs promoting regional planning and service delivery for a single function. Many of the new Federal programs

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<sup>27/</sup> The purpose behind balancing consumers and providers was, of course, to allow the industry being regulated--in this case, the medical industry--significant representation in the decisionmaking process while simultaneously preventing it from dominating that process. However, as a recent study of the comprehensive health planning program has shown, achieving a numerical balance among representatives may not in itself be enough to achieve this objective (30).

aiding substate regionalism in the seventies were of this type. While many of these single-purpose programs could be used by general-purpose regional organizations, others could not and, in several instances, new networks of regional organizations resulted. During the seventies two sets of regional bodies tended to emerge: one dealing with policies relating to the physical environment, the other dealing with matters relating to health and social welfare. However, to conclude that a bimodal Federal regional policy has resulted (that is, one having two distinct emphases) would be to oversimplify the current state of events. Federal regional policies remain complex.

Thirty-nine Federal programs provided support for substate regional activities during 1977-79; however, even though many of these programs were available throughout the Nation, a large number of the programs imposed limitations on the eligibility of regions and substate areas. Likewise, the programs varied in the continuity of their support for regional organizations; while some provided a relatively continuous basis of financial support for substate regional activities, some provided only startup or demonstration aid, and others were limited to special project support. Moreover, there was a propensity for the programs providing ongoing support to make official regional designations and to set forth special rules regarding composition of the governing boards and boundaries of agencies assisted.

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