The extent of citizen participation is influenced by local community factors, the character of Federal agency policy, and the purposes of Federal legislators and administrators. The latter include: decrease of alienation, engagement of the "sick" individual in the healing process, creation of a neighborhood power force able to influence the distribution of resources, and development of a constituency for a particular program which will agree with its intentions. Various suggested intensities of participation include: employment-information, dialogue-advice giving, shared authority, and control. The acceptance of citizen participation as a goal may facilitate discussion of the options for participation, while experimentally trying to learn which of the currently exercised options best achieve certain kinds of goals. Federal policy may be contributing to separation rather than integration through the allocation of responses to competing community structures. Black communities given control resources do not have the option of using these resources for integration, and may have to "win" them from other communities of poor people. New policies may be needed to provide the individual poor person maximal opportunity apart from any establishment or neighborhood leadership to develop his life opportunities. (JM)
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WORKING PAPER: ADVOCATES FOR THEMSELVES: CITIZEN PARTICIPATION IN FEDERALLY SUPPORTED COMMUNITY DECISION/PROGRAM ORGANIZATIONS

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ADVOCATES FOR THEMSELVES: CITIZEN PARTICIPATION IN FEDERALLY SUPPORTED
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I. POLICIES, PURPOSES AND PATTERNS OF PARTICIPATION IN FEDERAL PROGRAMS:

Federal citizen participation policy has evolved without a consensus or even a very clear definition of the problem. In part, the origin of the issue was a perception by social scientists and administrators that lack of involvement in the planning and delivery of social services for the poor and disadvantaged was associated with alienation and seemed to decrease the effectiveness of these programs. In part, the problem was whether and how to meet increasing demands by the poor and disadvantaged for a redistribution of decision-making authority. For others, the problem was how to build an effective political constituency for new social programs benefiting a minority of the population.

However the problem was perceived at the outset—to increase program effectiveness, to redistribute power, to build an effective political constituency for new programs—the problem has gradually shifted over the past five years from an issue dealing with individual involvement and participation to a matter of group rights and power vis-a-vis the larger community. Thus the issue is no longer primarily whether and to what extent individual citizens are to be involved in planning and delivering social services; but rather, how much control geographic neighborhoods or ethnic minorities (often coterminous) are to have
over public programs serving them. Thus citizen participation has become the problem of community control and decentralization of decision-making power from traditional Federal, state and local government levels to the neighborhood level.

Federal policy is still addressed primarily to the older definitions of the problem, although some programs are being forced to deal increasingly with the newer aspects of group power. Furthermore, there is no agreement in Federal policy or practice on what "citizen participation" itself does or should mean. We know from the field work done in preparation for this paper as well as from personal Federal employment that there are a variety of Federal conceptions with regard to citizen participation. Some of this variety derives from the fact that the term "citizen" has become (in addition to its traditional, legal meaning) a euphemism for those who are poor, black and brown.

Before proceeding to a description of Federal policies and practices we will define citizens and participation. The citizens we have in mind are of two categories: first are those whose current conditions make them the subject for intended benefits under Federal programs; second are those who may be disadvantaged as a result of the use of Federal resources (e.g., slum dwellers and small businessmen in the path of renewal clearance, or farm laborers whose jobs are threatened by "bracero" legislation). Participation can be viewed as an act or a series of acts by which the "citizen" has the opportunity to influence the distribution of benefits or losses which may be visited upon him (or upon those people he represents) as a result of Federally supported activity.

-2-
There is a certain *ad hoc*, unorganized quality about citizen participation defined in the above manner which is at sharp variance with the kind of participation which has the capacity to share in the governance of cities. In fact it is the *absence* of this *ad hoc* quality which potentially distinguishes citizen participation in the Federal Community Action and Model Cities Programs. Participation in these latter two efforts has focused great energy on the building of structures which can continuously be concerned with issues of governance as opposed to the transient, single purpose involvement which characterizes almost all other Federal efforts. Federal programs such as Model Cities and the Community Action Program are either concerned with a category of persons (those who are poor) or with persons living within a specified area. The structure for citizen participation in these two programs is in theory meant to provide an on-going vehicle for influencing a redistribution of goods and services to benefit all those who are poor or who reside within the model neighborhood. By this definition, community action agencies and model city agencies aspire to become governmental structures able to continuously offer opportunities for influence to their respective constituencies.

The great visibility which the Community Action and Model Cities Programs have given to citizen participation should not hide the fact that there is a history and practice in other Federal programs (outside of CAP and Model Cities) which lend themselves to the following categorization: (a) those Federal programs whose administrative guidelines call...
for "involvement," "participation," "seeking the advice of," but with few clues as to who is to be involved or what form the involvement is to take; and (b) those programs which show interest in the creation of limited purpose structures (e.g., councils, advisory boards, parent committees) to act as sources of influence over narrowly defined programs (e.g., mental health centers, headstart programs, vocational training). Of course there are many other Federal programs whose administrative guidelines (and legislation) do not reflect any visible concern with the issue of citizen participation.

The point is that there is no one Federal policy toward citizen participation--there are many policies. The most difficult and salient job for policy analysis is to determine where a profusion of policies is appropriate because of differing program goals, and where a profusion represents timorous administration, confusion as to purpose, and gaps between various Federal agencies.

Other investigators have also looked at citizen participation. In a review entitled "Neighborhood Power and Control," Spiegel and Mittenthal suggest the following types of participation: information, consultation, negotiation, shared policy and decision making, joint planning, delegation of planning responsibility, and neighborhood control. The Oakland Task Force of the San Francisco Federal Executive Board specified a narrower
continuum for participation ranging in intensity from employment\(^2\) through dialogue and influence, to control. Of particular use to this study is the Oakland Task Force's attempt to link patterns of participation with particular Federal agencies. Based upon a study of the Office of Economic Opportunity's (OEO) community action agencies, David Austin saw the following activities as components of participation:

the organization of advisory committees, holding a series of open community hearings and conferences, community sociotherapy, a union of service consumers, a community corporation through which the neighborhood directly controls a provision of community services, developing political skills and political organizations among citizens who have been ignored by traditional political party structures, a coalition of action organizations in low-income areas, and the urban community based on small, self-contained, self-maintaining, self-directing neighborhoods.\(^3\)

It should be noted that Spiegel and Mittenthal and the Oakland Task Force specified different patterns of citizen participation based upon a variety of Federal program activity. Conversely, Austin developed an even more detailed set of specifications based upon a single Federally supported activity--the community action agency. In contra-distinction

\[^*\] Employment in this sense means opening some jobs in public programs to poor and disadvantaged citizens. The jobs may be quite important. But they rate low in terms of citizen participation because those employed cannot formally help shape program policy or represent the interests of their group or neighborhood.
to the Oakland Task Force Report, Austin's data suggests that
participation varies within a single Federally supported effort
at least as much as it does between efforts supported by different
Federal agencies. This is not to negate the Oakland Task Force's
suggestion that different patterns of participation tend to be
associated with different Federal programs. But if Austin's find-
ings with regard to the Community Action Program are correct, there
may be a scale-like quality to patterns of participation within a
Federally supported program. The notion of scale would imply that
the Federal program which facilitates the most intense kind of
participation also reflects less intense patterns of participation.

This notion of intensity is reflected in the Oakland Task Force
scheme and in the Spiegel-Mittenthal paper. One of these papers sees
intensity beginning with employment and ending with control. The
other sees information activities as the least intense, but agrees
that control is the most intense form of participation.

It might be useful to fit these ideas of intensity variance in
citizen participation, to assume differences in Federal agency policy.
By combining the Spiegel-Mittenthal and Oakland Task Force schemes
one might come up with four measures of intensity (ranging from "least"
to "most" intense): (A) employment - information; (B) dialogue - advice
giving; (C) shared authority; (D) control. We have previously suggested
four patterns of Federal agency policy: (a) the no-policy program,
(b) the program whose guidelines call for involvement or participation

-6-
without further specification, (c) the program which specifies an advisory or policy body composed of "citizens," (d) the programs which call for citizen participation structures able to deal with an array of issues of governance on a continuing basis.

If the ideas of scale and intensity are valid, the patterns shown in Figure 1 might prevail. The diagram means to suggest that the intensity of citizen involvement in a particular program and the pattern of Federal agency policy are strongly related to each other. The diagram further suggests that the Model Cities and Community Action Program (policy "d") would be most likely to reflect control ("D"—most intense) as a form of citizen participation. Federal programs without an articulated participation policy ("a") would be likely to have the least intensive forms of participation as reflected by category "A"—employment and information.

In addition to the idea that intensity of involvement and Federal agency policy vary with each other, there is the unstated assumption that policy precedes—and influences—intensity. This is a most important assumption because it argues that the character of citizen involvement is directly influenced by the character of agency policy.

As already noted, David Austin's data has suggested that in the CAP program, despite a single national policy, there is a variety in local patterns of participation.
Figure 1. Suggested variance of intensity and patterns of citizen involvement in federally supported programs

* See text for intensity descriptions A through D and for policy descriptions a through d.
We have so far argued that the character or intensity of citizen participation is influenced both by local community factors and the character of Federal agency policy. If these appear to be rather obvious causal factors there is yet a third which is equally obvious and equally important. This is the factor of "purpose."

Purpose as a variable influencing the character of citizen participation is difficult to capture. On one level, purpose is apparent or can be inferred from the nature of the laws under which Federal programs operate. But in most Federal programs, purpose, as specified in administrative guidelines, becomes more significant than the law itself. One can argue that OEO's guidelines to amplify the legislative language of "maximum feasible participation" were more clear and important as to purpose, than the rather vague language of the law. Daniel P. Moynihan's writings are instructive in this area.

If administrative guidelines both amplify and deflect legislative purpose, it is equally clear that Federal administrators at all levels further amplify and deflect. One astute interviewee in the Department of Housing and Urban Development noted that administrative policy with regard to citizen participation was used as an indulgence. That is, in dealing with localities, the Federal administrator could indulge the community's inattention to citizen participation in return for more adequate performance in other areas. In effect, the purpose of citizen participation policy in such a case was to give the administrator something to trade with.
The variable of purpose has been dealt with carefully and similarly in separate papers prepared by Daniel Fox and the Organization for Social and Technical Innovation (OSTI) for OEO. Virtually identical lists in these papers suggest the following as purposes of citizen participation: (1) decentralization of governmental authority, (2) engineering the consent of the governed, (3) insuring equal protection to individuals and groups through a watchdog citizenry, (4) a form of therapy to cure alienation and other social diseases of our time, (5) employing residents so as to "humanize" services, (6) creating cadres of anti-rioters, (7) building a constituency for the program, and (8) redistributing power and resources.

While it may be generally presumed that a program's purposes are embodied in the law, the experience with regard to citizen participation is very different. Except in the case of the Economic Opportunity Act and the Model Cities legislation (and even in these cases) there is little or no legislative language with regard to citizen participation. Even if administrative policies go beyond legislative language and give some attention to citizen participation, one is still left with the finding that policies for participation at the Federal level are misunderstood, piecemeal and erratic in their implementation. One is overwhelmingly impressed with the degree of administrative discretion in this area. And one is even more impressed
with the apparent differences in purpose which various administrators attach to the idea of citizen participation. And there are indeed administrators who see no purpose in it at all. As a final note of description with regard to purpose, it was apparent that every Federal official interviewed perceived a lessening of interest in citizen participation on the part of the Nixon administration. This was despite the almost total lack of any hard evidence to support this perception up to the time this was written. (The Model Cities Program is the outstanding exception, in that a new HUD memorandum issued in May 1969 was viewed as very damaging to certain existing citizen participation arrangements.) If the reader is confused by this perception, he must remember that to Federal officials of any sophistication, the notion of citizen participation is in part a euphemism for the sharing of program authority with the black community. Federal staff apparently do not see such a sharing of authority as a high priority item in the Nixon administration.

II. CONCLUSIONS WITH REGARD TO THE PURPOSES OF CITIZEN PARTICIPATION

We would compress a previous list of purposes for citizen participation into four categories: (a) to decrease alienation, (b) to engage the "sick" individual in a process which will lead to his own healing, (c) to create a neighborhood power force able to influence the distribution of resources, and (d) to develop a constituency for a particular program, with the hope that the constituency will agree to the intended
program efforts. We previously examined various suggested intensities of participation and proposed that these too could be fit into four categories: (a) employment-information, (b) dialogue-advice giving, (c) shared authority, and (d) control.

It would be neat and simple if one could say that programs designed to achieve particular purposes, develop policy guidelines which tend to insure an appropriate structure for citizen participation. Logically, then, a program whose purpose was the "decrease of alienation," for example, might mandate policy advisory groups composed of neighborhood people. But we cannot pretend that we have unearthed any scheme by which purpose can be matched with particular formats for participation. Very few Federal program personnel even talk in terms of the creation of neighborhood power forces and their impact on resource distribution. The only programs in which one is apt to hear this kind of ideological purpose is primarily in the community action program and somewhat in the model cities effort. In terms of intensity of participation, it is primarily in these two programs that there exist citizen dominated policy groups which control portions of a program decision-making process.

In one area then, the paper is prepared to conclude that there is a linkage between purpose and structure. Federal programs such as CAP and Model Cities, whose program rhetoric deals with the notions of neighborhood "power," are also the most likely Federal programs to have citizen participation structures which show the capacity for control of
aspects of decision making. Additionally it is only the CAP program whose guidelines legitimate "protest" activities.

One might suggest that CAP and Model Cities Programs have indeed fashioned participation policies appropriate to their purposes. If the guidelines enable the formation of citizen dominated groups which can stand in the adversary/control relationship to other community elements, and the professed agency purpose is neighborhood power, then purpose and policy fit well.

We again stress that we make no pretense of having found any other systematic links between ostensible Federal purpose and program policies for citizen participation. But perhaps with one additional disclaimer: there is apparently a very strong link between those Federal programs whose purposes are the protection of the authority of the Federal Government and its local governmental clients, with citizen participation policies which act to depress citizen involvement.

These two claimed associations between purpose and citizen participation might appear as follows:

**Figure 2. Relation of Program Policy and Purpose of Citizen Participation**

<table>
<thead>
<tr>
<th>Purpose of Citizen Participation</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) To sustain the authority of the Federal Government and its local governmental clients in the operation of program.</td>
<td>a) Generally non-existent policies with regard to neighborhood citizen participation.</td>
</tr>
<tr>
<td>b) To build neighborhood based power b) groups able to influence local resource distribution.</td>
<td>Policies which encourage or mandate the establishment of neighborhood groups dominated by neighborhood residents and having potential control or concurrent authority over Federally supported inputs.</td>
</tr>
</tbody>
</table>
The problem with the above formulation is that it leaves a gaping hole in the "middle." What citizen participation policies are adopted if an agency defines its program beneficiary as one who is "sick" and in need of the assumed therapy of participation? Or if an agency simply wants its program to run with a minimum of difficulty, and is prepared to support citizen participation policy which will build a constituency for the program, while at the same time hopefully increasing the program's capacity to deliver? It seems a fair guess that some Federal personnel see urban renewal Project Area Committees (PAC) as operating in precisely this way. But isn't it likely that the most aggressive and successful PAC's will use modes of contention, and become adversaries to redevelopment agencies in precisely the way that the CAP initially intended to have happen with neighborhood organizations?

This discussion of purpose would become even more fragile and complex if we asked, "Whose purpose are we talking about?" Federal agency lawyers spend hours searching the legislative history of their programs to affirm the Congressional intent behind the language in the law. The laws themselves are either silent or very slim with regard to purposes of citizen participation, and with one or two exceptions, so are legislative histories. If one then turns to agency administrative policy in order to ascertain purpose, it still is difficult to know whether the guidelines reflect the top level of the executive branch, or departmental policy, or a middle
management writer whose ideas were only dimly perceived by the administrator who signed the policy statement. And if we are talking purpose, this paper has some further evidence that the purposes of agency field representatives in enforcing agency policy need to be taken account of. The conventional wisdom about civil service employees to the contrary, these employees appear to become very involved with what they understand the purposes of their programs to be. Within a single Federal department, HUD, Model Cities staff can appear deeply committed to citizen participation, while other staff tend to see it as a hindrance to production or something to "tradeoff" with.

This last observation about the purposes of "line" staff with regard to citizen participation suggests an important source of policy deflection. So long as the purposes of Federal citizen participation policy are unclear, and the policy itself is poorly defined, it may be fair to expect that there will be a great variety of local experience. This variety will be strongly influenced by Federal staff who perceive citizen participation to be a euphemism for black community involvement.

It ought to be said that a confusion or profusion of purpose does not necessarily demand a profusion of policies. With purpose so ill-defined, it would still be possible to have a single national policy (similar to Title VI of the Civil Rights Act) which demanded citizen
participation in all local programs using Federal funds, with a format to be determined locally within certain stated criteria.

It will undoubtedly remain important for some to argue that participation "stops riots," or creates a program constituency, or involves the recipient in his own therapy, etc. It may do all or none of these things. This paper has not attempted to assess which purposes are achieved through citizen involvement. Might it not be useful to argue instead that citizen participation qua citizen participation is the purpose? Citizen participation could be seen as both ends and means. As means it would remain important to know which other goals it facilitates. As ends, it could be seen as integral to all efforts taken by government as it seeks to deal with the imbalances in our society.

The acceptance of citizen participation as the goal (in addition to being an instrument toward other goals) will not and should not still the discussion of what form the participation should take, or how Federal policy should influence that form. But it might move the discussion to a level where legislators and other policy makers could discuss the options for participation, while experimentally trying to learn which of the currently exercised options best achieve certain kinds of goals.

III. PARTICIPATION/CONTROL: INTEGRATION/SEPARATISM

One has to deal with the argument that, to the extent Federal policies influence local structures for citizen participation, they
also strongly influence the arrangements by which minority and majority group leaders will deal with each other.

Let us return to use of graphics to pursue the argument. Existing structures for citizen participation lend themselves to three diagrams.

**Figure 3.**

**Situation A (Advisory)**

Established Decision Making Body

Citizen Advisory Groups

Seeks to engage "Citizens" in ad hoc or ongoing Advisory arrangements.

**Situation B (Coalition)**

Established Decision Making Body

This body itself is a coalition of various elements of the community always including the poor, the black and/or the brown.

**Situation C (Adversary)**

Established Public Decision Making Body

Established Neighborhood Decision Body

The neighborhood body is dominated by representatives of the poor, the brown and the black; has an authorized position in certain processes of community decision making.
Situation A is meant to depict citizen advisory groups made up primarily of the black, the brown and the poor. The use of such advisory groups begins to recognize the separated state of our society and attempts to rectify it by "integrating" into the decision process those who are currently under-represented or missing from our established decision structures. While most Federal policy, where it exists, seems to favor this kind of structure for citizen participation, to this writer the advisory committee structure seems like a "temporary" solution. It seems temporary because it is basically unsatisfactory in 1970 to those whom it is supposed to connect to community decision making. Nevertheless it may be an accepted and acceptable structure, if there is clear evidence that the "established decision-making body" itself is moving toward a more perfect representation of all elements in the community. In the absence of this movement, it seems likely that neighborhood dominated policy advisory groups will move to resemble the structure of situation C above. In this structure, both the "establishment" and the neighborhood, develop a new kind of accommodation with each other, with the local establishment surrendering (often with the aid of Federal policy) some decision prerogatives to the organized neighborhood. In effect, a simulated attempt at "integrated" decision making (situations A or B) gives way to a "separated" approach (situation C). A possible consequence of the movement to a "separated" structure (or what this paper also calls an "adversary" situation) is that minority leadership develops a stake in
the separation, and that the separation itself becomes "institutionalized;" a relatively permanent structure for handling many kinds of decision-making relationships between the majority and minority communities.

We have speculated that the inadequacies of "situation A" citizen structures can give way to the more permanent separation of "situation C." Situation A can also change into situation B structures, which is precisely what happened in the early part of the Community Action Program, and now seems to be happening in some community mental health centers. Situation B in essence recognized that "advice giving" is not a satisfactory form of citizen participation, and instead seeks to establish decision-making coalitions composed of formerly excluded elements of a community. Situation B is a specific attempt to shift the locus of decision making to structures which better represent the community than do most current "representative" bodies. These coalition decision structures can then become the embodiment of what a more truly integrated society would look like.

The policy boards of community action agencies have been the best reflection of this coalition strategy for decision making. There is some evidence that OEO is no longer satisfied, and is attempting to move its CAA's to become "brokers" in seeking the transfer of some of their authority for decision making to neighborhood dominated groups (thus coming to resemble situation C).

Implicitly, and now explicitly, we are suggesting that the movement in situation C forms of relationship has its analogue in the current
rhetoric of black separatism. Despite the fact that situation B relationships (coalitions) are not even contemplated by most Federal programs, they ironically seem to have lost their attractiveness to some minority group leadership. It is instructive to quote one black Federal official who felt that participation in coalitions "blunted" and "diverted" black militancy.

The structures represented in situations A, B and C are not theoretical abstractions. They are real depictions of what exists in the name of citizen participation in many Federally supported programs. Furthermore, the nature of Federal policy in different agencies seems a critical variable in determining which of the above situations shall prevail in particular programs and communities.

Situation A "advisory" relationships at the present are the dominant Federal types, but we believe there may be a transition to situation C "adversary" structures. We are familiar with the argument that situation C itself is but a transitional point toward more perfect patterns of representation in community decision-making bodies, yet we find little empirical evidence to support this argument. We are impressed with the possibility that separate decision making authority, based upon the facts of color neighborhoods and economic status, will remain separated. It is also possible that Federal policy as it is currently developed may be contributing toward this separation. At the very least we ought to recognize that those Federal policies favoring the creation of structures of poor, black, brown citizens have major implications for whether the ostensible national goal of integration will be achievable.
In another paper we have speculated that: "when the black community gets to control resources established for its aid, the basic options are: 1) to seek to heal the wounds caused to blacks by white racism, 2) or, to build a separate black community. These new programs under black control do not have the option to use these resources for integration." If this speculation should prove correct, then other Federal policies might be considered which could soften the drive to separatism. Such policies may seek to supplement (or even to supplant) the kind of intervention at the local level which quickly gets captured in the politics of black and white. New policies may need to be carried out on a national level which will insure adequate cash resources and good opportunities, so that individual minority members may have more life options, no matter what the separating tendencies of establishment and neighborhood leadership.

Some of the above arguments will be difficult to contemplate for many inside and outside Federal Government who have deep ideological commitments to particular forms of citizen participation. It is easy to view the development of Federal citizen participation policies and conclude that "control" is the logical and needed extension of the participation concept. The notion of "control" is at the heart of current thinking about decentralization of governmental functions to the neighborhood level. Decentralization which would allow the neighborhood to "advise" the centrality rather than to control a part of the "action" appears unacceptable to minority group leadership. The current experience with coalitions
(of groups or individuals) does not permit one to be sanguine about its short-term potentials as the structure for citizen participation. Despite the fact that most Federal programs are only at the point of experimenting with, or contemplating, advisory forms of participation, it seems clear that the current mood of the black and brown communities will not settle for advice-giving. And given current analyses of the situation of the minority communities it is difficult to argue that anything less than control would be useful. Despite these arguments, this analysis must caution that a rapid movement to "control" as the form of participation may hold consequences for the black, brown and white communities which are not acceptable tomorrow, even though the logic of control is clear today.

It is this caution about institutionalizing the "wrong answer" which underlies our recommendation that there be minimum Federal standards for citizen participation, but that these standards allow for a variety of structures including (but not limited to) "advisory," "coalition" and "control."

IV. A CONCLUDING NOTE:

In addition to a comparative analysis of citizen participation policies at the Federal level, we engaged in field study in seven local agencies. For quantity and complexity of material from the field, which is embodied in the larger report, ought not obscure the study's most salient points. These are that citizen participation is there to be observed, it works, it seems to have secured important commitment
by Federal and local staff, and it appears to have something very useful to contribute to the amelioration of tensions in our society. And it fits the American experience beautifully; so beautifully that we have repeatedly argued that citizen participation is best viewed as a goal for policy rather than an instrument toward achieving other goals (although it will accomplish that too).

Counterposed against the above visible benefits are the equally visible lacunae with regard to policy and practice. Citizen participation policy at the Federal level is erratic, piecemeal, misunderstood, and possibly not really cared about. But this patchwork of Federal attitudes and practices may have had great utility in contributing to Federal and local experimentation, with regard to participation, in the decade of the 60's. We would suggest that we have now learned enough to move beyond the benefits of a benign anarchy in policy, to a setting forth of what it is we have learned and where we want to go with a Federal policy for citizen participation. To continue the "benign anarchy" of citizen participation policy into the 70's would be a denial of the utility of these experimental years. Even more discouraging would be the additional evidence that we do not know how to create a sequence between the development of knowledge and the development of policy.

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REFERENCES


6. Urban Renewal Handbook, February 1969, U.S. Department of Housing and Urban Development, RHA 7217.1, Chapter 5, Section 1. These administrative guidelines mandate the establishment of a citizens' advisory committee (PAC) where rehabilitation is contemplated as part of a renewal effort.
