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Administrative Policy Making**

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Beyond Implementation: Developing an Institutional Theory of Administrative Policy Making

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The ghost of the politics-administration dichotomy haunts implementation theory. After all the critiques, administrative policy making is still seen as a component or step in the policy process that is dominated by elected officials. For example, Kelman recently examined the different institutional settings of policy making.¹ Elected officials, in his view, are and should remain the primary source of policy ideas and choices with administrators, in theory, responsible for translating these ideas and choices into practice. Other scholars underscore the lack of effective control by legislators and elected executives. But even those who acknowledge administrative initiative and autonomy see administrators as servants, however weak their masters.

This article takes implementation theory one critical step farther. It argues that administrative policy making is a separate, distinguishable process, not a stage in or component of the legislative policy-making process. Policies can and do originate in administrative agencies. These innovations gather supporters and critics, are tried and refined, and can become part of the routine with little, if any, involvement of elected officials or political appointees. Legislation and executive orders commonly ratify existing administrative policy rather than initiate administrative involvement.

In addition, the institutional setting for policy making has a major influence on policy ideas, choices, and actions. Administrative agencies form a distinct institutional setting for policy politics, and setting influences policy outcomes. Administrative policy making is not, however, an entirely discrete policy process. It intersects with legislative policy making at important and pre-

dictable points. The two policy processes, legislative and administrative policy making, are loosely and variably coupled.²

The central distinction is that administrative policy making is dominated by the ideas, norms, routines, and choices of nonelected public employees, whereas legislative policy making is dominated by the perspectives of elected officials. Administrative policy making can occur in the bureaucracies of the President or of Congress. In addition, legislative policy making routinely intrudes on the choices and actions of administrative agencies. The argument that these two processes are distinct does not deny their essential overlap. Nevertheless, their interaction remains obscure without a clearer perception of the differences. Before more fully developing these ideas, four examples of administrative policy making are briefly reviewed.

Food Stamps: Policy Making by Default

The first example is borrowed from Berry's study of the food stamp program.³ In many ways, food stamp regulation illustrates the common observation: vague legislation requires administrators to become de facto lawmakers. The major issues about who is qualified for assistance and the nature of the program were determined not by congressional committee or during floor debate but by bureaucrats. No one else was willing to take responsibility.⁴

Berry concludes that vague legislation does result from legislative irresponsibility. But he makes an additional and more telling point. Legislative nondecisions reflect choice, not indifference. He correctly notes that members

This article takes implementation theory one critical step farther. It argues that administrative policy making is a separate, distinguishable process, not a stage in or component of the legislative policy-making process. In addition, it argues that the institutional setting for policy making has a major influence on policy ideas, choices, and actions. Administrative agencies form a distinct institutional setting for policy politics, and setting influences policy outcomes. The implications of the institutional perspective for understanding policy making, policy analysis, and the legitimacy of public organizations are examined.

of Congress "sometimes write extraordinarily detailed statutory provisions and legislative reports."⁵ Ambiguous legislation is a calculated choice to delegate the fundamental decisions to administrative agencies that have both the technical expertise and the insulation from partisan pressures to make, in the lawmakers' eyes, more constructive choices. Administrative policy making provides a better forum for certain policy problems.⁶

Community Corrections: Implementation before Policy

Community corrections illustrates another dimension of administrative policy making. The implementation of community corrections acts was examined in three different states: Oregon, Colorado, and Connecticut.⁷ In all three states, community corrections was implemented years before the acts were passed. Implementation preceded policy. Local corrections officials were faced with impossible demands: jails were full while the number of convicted offenders was growing.

Community corrections was a local policy adaptation that placed nonviolent felons into halfway houses and treatment and training programs. As these programs proved to be cost-effective alternatives to incarceration, local policy entrepreneurs lobbied state legislators for new legislation and funding to expand and more firmly establish programs. Legislative policy making ratified and legitimated the results of administrative policy. Administrative agencies were the setting for both generating policy ideas and making the local political choice.

Surrogate Parents and Technical Politics

The third example represents an extreme of administrative initiative but one that is increasingly important. In many areas of technical policy making, administrators are allowed the initiative out of deference to their expertise.⁸ This initiative is often subtle and indirect, at times barely visible. The political controversy over surrogate parenting provides a current example. The National Institutes of Health funded basic research on in vitro fertilization. Except for the level of appropriation for medical research in general, such decisions are left to administrative agencies. But as new procedures and technologies become part of medical practice, elected officials are left to deal with the results. As of 1988, four states had enacted legislation banning surrogate-parent contracts, and 34 others were considering legislation.⁹

However, legislative bans and limits rarely halt or even slow technical advances. The fundamental choice of whether or not to commit public resources to projects with important social implications is left to administrative agencies, which rarely consider their nontechnical implications. Technical change is transforming contemporary society. In this realm, administrative policy making takes the initiative, leaving elected officials to accommodate to the results.

Public Welfare: Responding to Client as Citizen

The final example of administrative policy making is based on Johnson and O'Conner's study of policy making in Pennsylvania's Department of Public Welfare.¹⁰ They documented the oft noted conflict between top- and bottom-level decision makers. Top-level administrators, especially political executives, work closely with elected officials to restrain administrative policy making within legislative mandates. They try to assure accountability. Like other students of implementation, Johnson and O'Conner found that career administrators and front-line staff must be considered policy makers because they substantially alter public welfare policy.¹¹

But Johnson and O'Conner make an additional point. They argue that, in Pennsylvania's Department of Welfare, administrative policy is more responsive to the needs of clients than are the original legislative mandates. An important difference between legislative and administrative policy making is in their institutional response to citizens. Legislators attend to citizens as voters and interest group members. Administrators view clients or customers as citizens.

Moreover, the internal discretionary decisions of administrative agencies often have the effect of law. They serve as precedent for future agency decisions and alter the lives of citizens. Mashaw studied the implementation of the disability benefits program within the Social Security Administration. He observed the creation of an internal law of administration. "For our purpose," he said, "this law is internal in the more significant sense that it has remained largely unaffected by traditional legal control through judicial review and, at the examiner level, by the forms of external legal process."¹² The discretionary judgments of administrative agencies involve fundamental political questions of what citizens receive from government. In addition, these decisions create internal law-like procedures. Yet, these policy choices are largely independent of legislative involvement and oversight.

Beyond Implementation

These examples contain the core ideas of administrative policy making. The observation of a separation of legislative and administrative arenas is as old, some would say as threadbare, as the politics-administration dichotomy. The perspective presented here is, however, conceptually distinct. In the traditional politics-administration distinction, administrative policy making is an instrument of legislative policy making. Politics and administration remain separate functions.¹³ More than two decades of research on policy implementation has documented the great influence that administrative agencies have on the substance of public policy.¹⁴ Nevertheless, the terminology of implementation emphasizes the subservient role of administrative agencies.¹⁵ This subservience is appealing to a nation historically distrustful of bureaucracy, but it is conceptually flawed.

The most fundamental flaw is the presumption that administrative agencies are mere receptacles for the preferences of legislative institutions and elected leaders. Administrative agency actions are not "a vector sum of contending external forces that impinge on [agency] functioning."¹⁶ As Mashaw observes: "The suggestion that positive administration, bureaucratically organized, can be combined with law in a unified vision--perhaps even a vision of justice--appears both historically implausible and conceptually muddled."¹⁷

There is, therefore, a strong need to build an alternative view of administrative policy making. The view presented here is based on the assumption that all policy is shaped by the particular institutional setting within which it evolves. Whether made in administrative or legislative institutions, "policy is made and applied to us by minorities . . . occupying strategic positions in specialized organizations."¹⁸ The central differences between administrative and legislative policy making lie, therefore, in the differences between these specialized organizations or settings.

Characteristics of Administrative Policy Making

Administrative policy making involves the entire range of public action, from agenda setting and innovation through implementation and evaluation. Rosenbloom argues that administrative agencies incorporate all the separate powers of government, "public administrators make rules (legislation), implement those rules (an executive function), and adjudicate questions concerning their application and execution (a judicial function)."¹⁹ Handler concludes that policy making and implementing are not conceptually distinct and that, together, they form a theory of public action.²⁰ Both views suggest that the policy-making role of administrative agencies goes far beyond adapting legislative or executive policy through implementation. Administrative agencies are important sources of policy creation.

Administrative Agenda Setting

Administrative agencies create policy in two different ways. The first is relatively rare, but it has considerable currency in the political science literature. As in the example of food stamps, administrative agencies become arenas for policy creation by the default of legislative authority. Vague legislation and policy deadlocks require administrative action. These policy areas represent issues that are on the legislative agenda but are not adequately resolved. It is important to note, as Berry concludes, that policy default is often intentional.²¹

The second form of administrative policy creation is more common but less visible. Many social issues are on the administrative policy agenda but are not on the legislative agenda. The agenda-setting literature assumes that issues off the legislative agenda do not exist.²² But nearly every area of policy concern, no matter how esoteric, is

addressed somewhere in the bureaucracy. Agenda setting is often agenda shifting from administrative to legislative policy making.

Issues on the administrative agenda but not on the legislative agenda include pressing social problems that are politically unpopular, such as prison overcrowding. Such issues lack political constituents, but they affect citizens. These policy problems force responsible administrative policy makers, like those who initiated community corrections, to develop solutions. Policy problems presented by science and technology are also prominent on administrative agendas. Indeed, technical politics presents a paradigm of administrative policy making. Major social issues involving technical questions are often addressed and resolved without the involvement of the public or elected officials, a process Lowi and Ginsberg criticized as *poliscide*.²³ Technical issues, such as *in vitro* fertilization, may eventually require the attention of lawmakers. Nonetheless, many of the most telling decisions are made long before such technical issues appear on the legislative agenda.

Administrative Policy Forum

Administrative agencies also provide a forum, but a very different forum, for political discussion. Administrative policy making is less public. There is no "Adm-SPAN." Administrators prefer to keep deliberations out of the public eye and limit access to information. Inconsequential reports are often classified, and the technical jargon of unclassified reports prevents all but the initiated from following the internal debates. If much administrative policy making occurs in the shadows, how can agencies be considered a forum?

First, specific mechanisms are used for public involvement. These mechanisms include hearings, notes and comments, and advisory councils. While these forums do not provide the broad base of involvement of voting, they do engage citizens in the specifics of policy. Citizen participation in policy is paradoxical. Less restrictive mechanisms, such as voting, have little direct impact. More restrictive procedures, such as citizen participation on advisory boards, do not reflect a broad spectrum of interests but engage citizens in actual policy deliberations. When the public does get involved in administrative policy making, it does so at the specific policy level. In addition, administrative agencies tend to employ individuals who are more representative of the general population than those elected to public office.²⁴ The public indirectly participates through its bureaucratic representatives.

In addition to public participation, much administrative policy making at the lower levels occurs in response to the needs of individuals or groups of citizens. Rather than the abstract mandates of voters, providers of government services daily face citizens as clients or consumers. Decisions to assign a child to a learning disability class, to turn down a zoning variance, or to sentence someone to community corrections all involve responding to or ignoring

individual citizen interests. Administrative agencies deal with large and varied segments of the public, and bureaucracies provide the setting for routine contact between the public and government. Many policy innovations result from the interaction of agency programs and citizen needs.

Loose Connections with Legislative Policy Making

Although administrative policy making is not a stage in legislative policy making, neither is it completely separate. Administrative and legislative policy making form a loosely coupled system. It is important, therefore, to examine both the distinguishing features of each arena and their points of connection. Implementation theory was born out of the recognition of the lack of connection between legislative and administrative policy making. Bureaucracies were seen as inefficient conductors of legislative will. But this does not imply that bureaucratic organizations are inefficient. They are simply better at pursuing administrative interests.

Two major points of connection between legislation and administration are legitimacy and money, both granted to administrative agencies by legislators. Bozeman argues that political authority is a fundamental resource of all public organizations.²⁵ The creation of agencies and most programs within agencies requires legislative mandates. When these mandates are created or adjusted, bureaucrats must work closely with lawmakers. These points of interaction are less frequent with a mature agency whose history and relations with clients provide additional sources of legitimacy.

However established they may be, agencies must routinely turn to lawmakers for funding. Even though most budgets are incremental, the ritualized contact between these two policy arenas over budgets is a major source of connection. Interaction over resources is also important for administrative policy innovations. Local administrative innovations, such as community corrections, require the support of law and resources of state and federal governments before becoming diffuse and institutionalized.

Viewing the relationship between administrative and legislative policy making as loosely coupled underscores the variable nature of their interaction. In some policy areas administrative agencies retain near monopolies on the policy process. In others, the interaction follows the traditional conception of administrative implementation of legislative will. The nature and form of the coupling also changes based on legislative attention. Legislative policy making has primacy in the sense that even in areas where administrative policy making dominates, elected officials have the right to intrude. Although they can rarely fulfill the responsibility, lawmakers retain oversight of even such highly sensitive and secret policy areas as Central Intelligence Agency (CIA) covert operations.

Institutional Issues in Administrative Policy Making

Administrative agencies are complex settings for policy politics. Fundamental to the argument presented here is

that the nature of the setting has a major impact on the policy process and result. Throughout this article, administrative policy making has been described as a distinct process for policy creation as well as implementation. Perhaps its most distinctive feature is its invisibility. Major policy actions are taken with little apparent conflict or debate. The funding of research on *in vitro* fertilization is but one example. A careful review of the administrative decision process would likely reveal little discussion about the social impact of this new technology. Research administrators assume that promising basic research deserves funding, and such assumptions are rarely questioned.

Administrative agencies are the institutional embodiment of past policy choices. This is important on two levels. First, agencies and programs are created to implement specific policies. But once established they develop their own norms and procedures that become difficult to change or redirect. This is one reason why policy reforms often require the creation of new programs or agencies. Secondly, within the agencies the rules, procedures, norms, and expectations become unquestioned, taken-for-granted facts of organizational life. Handler's study of the Social Security Administration showed how procedural rules evolved for dealing with specific policy problems.²⁶

This institutionalization process is circular. Individuals and groups develop rules and norms to deal with their problems and conditions. These rules and norms, in turn, shape the perception and understanding of problems and conditions. Perhaps the greatest contrast between legislative and administrative policy arenas is found in the divergent interpretations and meanings given by different actors for their actions. Administrators see the policy world differently than elected officials. As Scott observed, rules and norms reflect "differentiated and specialized cognitive and normative systems. . . ."²⁷ Much administrative policy making is, therefore, shaped by established definitions of problems and solutions that are enshrined in organizational rules, norms, and habits. These institutionalized norms become part of the architecture of the political structure.²⁸

The institutional perspective focuses attention on both the creation of these patterns and their persistence over time. These two dimensions underscore the importance of the cultural and symbolic dimensions of public organizations. If perceptions and interests are partially defined by established assumptions, then these elements of the cultural infrastructure of administrative agencies have a major, if hidden, impact on administrative policy making. Recent research on administrative reorganizations underscores both the impact of institutionalized assumptions on the policy process and the difficulty and danger in changing these assumptions.²⁹

The institutional perspective also has implications for policy analysis. Institutional theories stress how historical precedent and established rules and norms shape policy decisions. Neustadt and May observe that unanalyzed historical analogies shape most policy deliberations.³⁰ These analogies reflect the unquestioned assumptions that define both policy debate and analysis. Institutional theories sug-

gest that policy analysts should borrow more heavily from the methods of natural history than from experimentation. Scholars and practitioners need to understand how policies evolve and how to place them in time and institutional contexts.

Administrative Policy Making: Still Illegitimate?

Accepting administrative decisions and actions as a separate, distinct, policy-making process raises difficult questions about the legitimacy of public administration. These questions need to be addressed on two levels. The first is the broad, even constitutional, approach taken by Rohr and others, who reexamine history for sources of legitimacy for the administrative state.³¹

A second and more humble approach is tacit legitimacy or the general acceptance of the decisions and authority of agencies to make and implement policy. Tacit legitimacy is based on public confidence that administrative agencies are applying their expertise in the public interest and that the public can, if motivated, influence agency actions. As Berry concluded:

For Americans to have confidence in and respect for their government, they must believe they have meaningful ways of influencing it. A bureaucracy

that appears to be impenetrable and that is perceived to write regulations through incomprehensible procedures will breed contempt and disrespect no matter how wise its decisions.³²

Thus, the legitimacy of administrative policy making largely depends on assuring that it remains a forum within which citizens as clients and consumers have a voice. Recognizing the role of administrative agencies in policy creation is an important first step. Standard views of implementation allow administrative agencies to borrow legitimacy from lawmakers, but recognizing the functional independence of administrative policy making requires independent sources of legitimacy. Tacit legitimacy is not granted like a royal charter but earned in routine service.

* * *

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Notes

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1. Steven Kelman, *Making Public Policy: A Hopeful View of American Government* (New York: Basic Books, 1987).
2. This article clumps together a highly varied set of public organizations to contrast administrative policy making with legislative policy making. In practice, these two institutional settings are increasingly mixed. One of the most important trends in American government is the bureaucratization of the federal and state executive and legislative functions; see Francis Rourke, "Bureaucracy in the American Constitutional Order," *Political Science Quarterly*, vol. 102 (Summer 1987), pp. 217-232. It is also likely, but beyond the scope of this article, that judicial policy making forms a third institutional arena for policy making.
3. Jeffrey Berry, *Feeding Hungry People: Rulemaking in the Food Stamp Program* (New Brunswick, NJ: Rutgers University Press, 1984).
4. *Ibid.*, p. 70.
5. *Ibid.*, p. 115.
6. For a different case with similar conclusions see also Steven Maynard-Moody, "The Fetal Research Dispute," Dorothy Nelkin, ed., *Controversy: Politics of Technical Decisions, Second Edition* (Beverly Hills: Sage Publications, 1984), pp. 213-232.
7. Michael Musheno, Dennis Palumbo, Steven Maynard-Moody, and James Levine, "Community Corrections as an Organizational Innovation: What Works and Why," *Journal of Research in Crime and Delinquency*, forthcoming.
8. For other examples see Nelkin, *ibid.*
9. Andrew Malcolm, "Steps to Control Surrogate Births Stir Debate Anew," *New York Times* (June 26, 1988), pp. 1 and 11.
10. R. Johnson and R. O'Conner, "Intra-agency Limitations of Policy

Implementation: You Can't Always Get What You Want, But Sometimes You Get What You Need," *Administration and Society*, vol. 11 (August 1979), pp. 193-215.

11. Michael Lipsky, *Street-level Bureaucracy: Dilemmas of the Individual in Public Service* (New York: Russell Sage Foundation, 1980); Jeffrey Pressman and Aaron Wildavsky, *Implementation, Third Edition* (Berkeley: University of California Press, 1984).
12. Jerry Mashaw, *Bureaucratic Justice: Managing Social Security Disability Claims* (New Haven, CT: Yale University Press, 1983), p. 213.
13. Dwight Waldo, "Politics and Administration: On Thinking about a Complex Relationship," Ralph Chandler, ed., *A Centennial History of the American Administrative State* (New York: The Free Press, 1987), pp. 89-112.
14. For a review see Dennis Palumbo and Dennis Calista, eds., "Implementation: What We Have Learned and Still Need to Know," *Policy Studies Review*, vol. 7 (Autumn 1987), pp. 91-246.
15. Vicki Eaton Baier, James G. March, and Saetren Harold, "Implementation and Ambiguity," *Scandinavian Journal of Management Studies*, vol. 2 (May 1986), pp. 197-212.
16. Mashaw, *ibid.*, p. 16.
17. *Ibid.*, p. 1.
18. Emmette Redford, *Democracy in the Administrative State* (New York: Oxford University Press, 1969).
19. David Rosenbloom, "Public Administrative Theory and the Separation of Powers," *Public Administration Review*, vol. 44 (May/June 1983), pp. 219-226.
20. Joel Handler, *The Conditions of Discretion: Autonomy, Community, Bureaucracy* (New York: Russell Sage Foundation, 1986).
21. Berry, *ibid.*
22. John Kingdon, *Agendas, Alternatives, and Public Policies* (Boston, MA: Little, Brown and Co., 1984); Nelson Polsby, *Political Innovation in America: The Politics of Policy Initiation* (New Haven, CT:

- Yale University Press, 1984); Stephen Hilgartner and Charles L. Bosk, "The Rise and Fall of Social Problems: A Public Arenas Model," *American Journal of Sociology*, vol. 94 (July 1988), pp. 53-78.
23. Theodore Lowi and Benjamin Ginsberg, *Poliscide* (New York: Macmillan, 1976).
 24. Samuel Krislov and David Rosenbloom, *Representative Bureaucracy and the American Political System* (New York: Praeger, 1981).
 25. Barry Bozeman, *All Organizations Are Public: Bridging Public and Private Organization Theories* (San Francisco: Jossey Bass, 1987).
 26. Handler, *ibid.*
 27. W. Richard Scott, "The Adolescence of Institutional Theory," *Administrative Science Quarterly*, vol. 32 (December 1987), p. 500.
 28. James March and Johan Olsen, "The New Institutionalism: Organizational Factors in Political Life," *American Political Science Review*, vol. 78 (September 1984), pp. 734-749.
 29. Steven Maynard-Moody, Donald Stull, and Jerry Mitchell, "Reorganization as Status Drama: Building, Maintaining, and Displacing Dominant Subcultures," *Public Administration Review*, vol. 46 (July/August 1986), pp. 301-310.
 30. Richard Neustadt and Ernest May, *Thinking in Time: The Uses of History for Decision-makers* (New York: The Free Press, 1986).
 31. John Rohr, *To Run a Constitution: The Legitimacy of the Administrative State* (Lawrence: The University of Kansas Press, 1986); Richard Stillman II, ed., "The American Constitution and the Administrative State: A Symposium," *Public Administration Review*, vol. 47 (January/February 1987), pp. 4-119.
 32. Berry, *ibid.*, p. 147.

Response to Steven Maynard-Moody

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The author's argument that career public administrators are active participants in the public-policy process who make policy decisions on an ongoing basis has become accepted as conventional wisdom of public administration.¹ His thesis that administrative policy making and legislative policy making are distinctive but loosely coupled processes is much more subject to debate. Maynard-Moody unfortunately has ignored the useful differentiation that James Anderson and others have made between primary and supplementary policy-making roles.² Anderson, for example, suggests that primary policy makers are those who have direct constitutional authority to act, such as Congress or state legislatures. Supplemental policy makers are those who must gain their authority to act from others and as a result are at least potentially dependent upon or controlled by the primary policy makers.

While the distinctiveness of these two processes is the fundamental and most frequently repeated theme of his paper, Maynard-Moody does not establish successfully the proposition that administrative agencies are neither dependent upon nor controlled by primary policy makers. To the contrary, while presenting the opposite argument, he appears to acknowledge the dependency and controlled conditions set forth in the primary-secondary relationship model.

The author also argues the widely held thesis that the setting within which policy making occurs has a significant impact on the policy process and on policy results. The critical challenge here for the theory builder is to understand and describe accurately the policy environment. Accuracy in depicting the political and administrative cultures that exist and operate within the

administrative policy environment is especially important because these are two of the most significant factors affecting both the public policy process and its content.

Unfortunately, the paper does not meet this accuracy standard. To the contrary, the author presents a set of his own undocumented assumptions regarding the values, motives, and operating styles of public managers that are at odds with much contemporary public administration literature on these matters. In describing the administrative policy-making process, for example, he depicts public administrators as self-serving individuals who are primarily concerned with maintaining the status quo and protecting both their individual programs and their potential for career advancement. He also argues that administrators "prefer to keep deliberations out of the public eye and limit access to information."

If several of the author's undocumented observations are true portrayals of the culture of public agencies, they should cause great concern and command priority attention.

The author concludes with a discussion of the conceptual elements that should be incorporated into a theory of administrative policy making. In defining the primary elements, however, he does not include or make reference to such important matters as accountability, representation, responsiveness, ethics, and citizen access. The importance of these considerations was reinforced during Minnowbrook I and should continue to be regarded as essential elements in the assessment of administrative policy making.

While developing a greater theoretical understanding of the evolving nature of the culture and dynamics of admin-

istrative policy making, it is important that constitutional history, legal precedents, and politically defined roles in the policy process are not ignored in an effort to provide a false sense of professional autonomy that may not be in the best interest of either public administrators or those they seek to serve. Equally important is the need to

describe accurately the administrative policy-making environment, including the values and philosophies that guide or should influence the actions of public administrators. To do less will serve only to create further distrust of those who, as Maynard-Moody describes them, "apply their expertise in the public interest."

Notes

1. See, for example, Kenneth J. Meier, *Politics and the Bureaucracy: Policymaking in the Fourth Branch Government* (North Scituate, MA: Duxbury Press, 1979), pp. 72-71, where he described in some detail the specific ways in which administrators exercise political sanctioned policy-making roles.
2. See James E. Anderson, *Public Policy-Making* (New York: Praeger Publishers, Inc. 1975).

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