THE WHITE HOUSE
OFFICE OF DOMESTIC POLICY

CAROL H. RASCO
Assistant to the President for Domestic Policy

To: ______________________ ______________________

Draft response for POTUS
and forward to CHR by: ______________________

Draft response for CHR by: ______________________

Please reply directly to the writer
(copy to CHR) by: ______________________

Please advise by: ______________________

Let's discuss: ______________________

For your information: ______________________

Reply using form code: ______________________

File: ______________________

Send copy to (original to CHR): ______________________

Schedule ? : ☐ Accept ☐ Pending ☐ Regret

Designee to attend: ______________________

Remarks: ______________________

Who was with you on this? Graynor?

THE GREATER KANSAS CITY COMMUNITY FOUNDATION AND AFFILIATED TRUSTS

March 2, 1995

MAR - 7 1995

Carol Rasco
Assistant to the President, Domestic Policy
White House
Washington, DC 20500

Dear Carol,

It was a very special privilege to have the opportunity to meet with you last week while we were in Washington. Thank you for your warm reception and the interest that you are showing in Kansas City's efforts to improve the health and safety of our children.

As promised, we are forwarding to you a copy of a concept paper on how we would in the next 90 days open our public schools in the Kansas City, Missouri School District to provide a safe place for our young people to go after school that will be fun and developmentally rewarding. Reggie Robinson has been sent a copy as well and has agreed to share his comments .

I am hopeful that you will be able to help us secure the $1million needed to launch this effort. Kansas City has in place the organizational infrastructure and media support necessary to mobilize the community around this effort to have it operational by May of 1995.

Thanks again for your interest and support. I look forward to hearing from you on possible next steps.

Sincerely,

Jan
Janice C. Kreamer

Cindy
Cindy Sesler Ballard

James M.Caccamo

cc: Steve Hill, Jr.

1055 Broadway, Suite 130, Kansas City, Missouri 64105 / (816) 842-0944 / FAX: (816) 842-8079

An Implementation Grant Application to the

United States Department of Justice

Janice C. Kreamer
President
Greater Kansas City Community Foundation
and Affiliated Trusts
1055 Broadway, Suite 130
Kansas City, Missouri 64105

(816) 842-0944

REQUEST

The Greater Kansas City Community Foundation and Affiliated Trusts requests a grant of $1 million to support the Neighborhood Youth Development Project, which is designed to open 15 public schools in the Kansas City, Missouri School District (KCMSD) during nonschool hours. This initiative will provide the 47,000 young people that attend school or live in the neighborhoods served by the KCMSD the opportunity to participate in positive youth development activities that enable them to meet their basic needs and build their individual assets and competencies during nonschool hours. YouthNet, a youth-serving agency with demonstrated board and staff capacity to undertake this effort, will administer and operate this program.

A safe and developmentally rewarding place for our young people to go during nonschool hours is a priority of the Greater Kansas City community. This grant will enable us to: 1) expand our system of positive youth development activities; and 2) strengthen the cognitive, social, physical, emotional and moral capacities of area youth. Support from the Department of Justice for the Neighborhood Youth Development Project will enable us to accomplish the aforementioned goals and demonstrate the significant correlation between prevention efforts and the reduction of youth-related crime.

BACKGROUND

YouthNet began in the summer of 1988 in response to the growing influence of drug gangs from Los Angeles and Jamaica on inner-city youngsters. The mission of YouthNet is to help at-risk youth 11-17 avoid self-destructive behaviors, such as gangs, crime and substance abuse, that keep them from succeeding in school and life. Since its inception, YouthNet has served more than 12,000 inner-city youth through year-round activity programs in 19 youth-serving organizations, special programs in eight middle schools, and one-to-one and group counseling services. YouthNet is comprised of the following organizations:

Boys & Girls Clubs
G.W. Carver Center
Clymer Center
Della Lamb Community Services
Don Bosco Community Center
Genesis School
Guadalupe Center
Jackson County Juvenile Court
Kansas City Missouri Parks and Recreation
Kansas City Missouri School District
Mattie Rhodes Counseling & Art Center
Minute Circle Friendly House
Niles Home for Children
Northeast Counseling Center
Salvation Army
Synergy House
Whatsoever Community Center
YMCA

YouthNet is a comprehensive, year-round program designed to lesson problems affecting youth and families and to provide constructive alternative activities at youth centers and middle schools in the Kansas City, Missouri School District. The program targets youth ages 11 to 17 because of the: 1) critical need for supervised extended day programming for pre-adolescents; 2) absence of extracurricular activities in the KCMSD middle schools; and 3) susceptibility of this age group to delinquent and destructive behaviors. Although there are two distinct phases of YouthNet, summer programming and school-year activities, both have the same underlying structure: outreach, counseling and activities. All aspects of the YouthNet programming emphasize keeping young people in school and away from drugs and gangs.

WHY THE NEIGHBORHOOD YOUTH DEVELOPMENT PROJECT IS NEEDED

Nonschool hours constitute the biggest single block of time in the life of a young adolescent. According to the Task Force on Youth Development and Community Programs, which was commissioned by the Carnegie Corporation of New York, about 40 percent of adolescents' waking hours are discretionary -- not committed to other activities (such as eating, school, homework, chores, or working for pay).[1] Many young adolescents spend virtually all of this discretionary time without companionship or supervision from responsible adults. They spend the time alone, with peers, or -- in some cases -- with adults who may exert negative influences on them or exploit them. Consequently, nonschool discretionary time represents an enormous potential for either desirable or undesirable outcomes in the young person's life -- a potential that many parents, educators, and policy makers fail to appreciate.

While metropolitan Kansas City experienced a one percent increase in youth-related crimes in 1994, in areas (urban core) where YouthNet and its member agencies are engaged along with other caring adults in the lives of young people, youth-related crime decreased 22 percent. According to David Bodde, president of Midwest Research Institute, this reduction in youth-related crime is attributable to YouthNet staff and member agencies' ability to engage young people in creative and constructive uses of nonschool time.

Ramon McGlothen, a youth participant in the Squash It Campaign,[2] explains the need for a safe place to go after school. "A lot of kids have two choices, they can watch TV or hang out. We all know what hanging out can lead to..." shares McGlothen. Local youth serving agencies offer excellent programs in a safe environment but, like in many cities, the demand in Kansas City far exceeds the availability. Fortunately, Kansas City's civic leadership is listening to the concerns of young people like Ramon and to what we empirically know works. Expanding the use of KCMSD facilities during nonschool hours will enable us to further reduce the incidence of youth-related crime, while simultaneously providing our young people with the necessary community supports to improve their life chances and future aspirations.

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[1]Timer, S.G., Eccles, J., & O'Brien, I. (1985). How children use time. In F.T. Juster and F. B. Stafford (Eds), *Time, Goods and Well-being*. Ann Arbor: University of Michigan, Institute for Social Research.

[2]Squash It is a campaign aimed at curbing youth violence by promoting a social norm that says *'it is cool and smart to walk away'* from an escalating confrontation. Squash It was developed by Dr. Jay Winsten, Director of the Center for Health Communication, Harvard School of Public Health, who is also credited with developing the designated driver campaign. Kansas City is the first metropolitan area to bring Squash It to the local level.

HOW THIS PROGRAM WILL WORK

YouthNet will contract (for a 12-month period) with 15 of its member agencies to operate after school, weekend and summer programs within KCMSD schools and will serve approximately 15,000 youth ages 11 to 17 (1,000 youth per school). The 15 sites will be divided into three five-site clusters. Each cluster will have the following staff:

YOUTHNET EMPLOYEES	MEMBER AGENCY EMPLOYEES
Project Coordinator	Outreach Worker
Parent Support Coordinator	Youth Advocate
	Program Staff

Each site will offer the following core services: 1) educational support services (tutoring, study skills, homework assistance); 2) parent support activities (parenting education, information/referral, community information, parent participation activities, skill development opportunities); 3) access to employment and training opportunities; 4) supervised cultural and entertainment programs; 5) adult mentors/role models; and 6) recreational activities for all participating children and teenagers. In addition, site-based outreach workers will identify children and families with serious needs and will provide individualized case management services to connect those students and their families with appropriate services (health care, substance abuse, social services, public assistance, etc.) and follow-up.

Staff will also insure that all Neighborhood Youth Development activities address concerns specific to each neighborhood (e.g., transportation for children, attending schools in other neighborhoods, and special program arrangements for younger siblings for whom older children have responsibility). All programming and services will be race, gender and language appropriate.

BUDGET

The total cost of this project is $2,654,750. The Community Foundation is seeking short and long-term funding from local philanthropic organizations and government agencies. Proposals are pending with the Ewing Marion Kauffman Foundation, Hall Family Foundation and the administrators of the Community Backed Anti-Drug Sales Tax, a quarter-cent sales tax designed to support a local and intensified war on drugs.

EVALUATION

The Neighborhood Youth Development Program will be measured by: 1) the reduction of youth-related crime in neighborhoods where school-based programs are located; 2) gradual improvement in residents' perceptions of safety, community disorder, drug problems, youth violence and police protection (compared to baseline data gathered in 1994); and 3) YouthNet's ability to use its Management Information Systems to track and report on indices such as youth participation levels, academic performance, and involvement with juvenile authorities.

The Greater Kansas City Community Foundation sponsored a citizen survey in September 1994 within seven neighborhoods participating in community policing to measure residents' attitudes about factors that influence the quality of life of their communities, including street safety, disorder, youth crime and violence, drugs and police protection. The survey serves as a baseline to measure the impact of community policing, and will also be used to measure the impact of the Neighborhood Youth Development Program. The Community Foundation will sponsor annual reviews of these attitudes and perceptions as a component of this evaluation. Additionally, YouthNet will work with Midwest Research Institute staff who are implementing the Vital Signs Indicators Project[3] to further quantify our ability to accomplish the aforementioned goals and demonstrate the significant correlation between prevention efforts and the reduction of youth-related crime.

[3] The Vital Signs Indicator Project is a metropolitan-wide effort to collect, disseminate, and maintain data in a number of categories such as health, business conditions, children and youth, the family unit, education, housing, crime and the environment. Vitals Signs serves as an "external" measure of the community impact of intervention programs, and as such, complements "internal" evaluations implemented by service providers to measure the achievement of program goals within their target populations.

Neighborhood Youth Development Project
1995 Budget

1. Project Management (YouthNet)

A. Personnel

Project Manager	40,000		
Project Coordinatoors (3 @ $25,000)	75,000		
Parent Support Coordinators (3 @ $25,000)	75,000		
Administrative Assistant	25,000		
Personnel Subtotal	215,000		
Fringe, Payroll Tax @ 25%	43,750		
Total Personnel Costs		258,750	

B. Supplies and Operating Expenses

Training	8,000		
Site Support (utilities, phone, maintenance	10,000		
Mileage	5,000		
Printing and Supplies	8,000		
Youth Leadership Stipends	50,000		
Travel, Conferences	15,000		
Evaluation	50,000		
Total Operating Expenses		146,000	
Total Project Management Costs			404,750

2. Site Costs (to be contracted with YouthNet Agencies)

A. Personnel

Outreach Worker	22,000		
Activities Staff	20,000		
Youth Advocate	26,000		
Personnel Subtotal	68,000		
Fringe, Payroll Tax @ 25%	17,000		
Total Personnel Costs		85,000	

B. Supplies and Operating Expenses

	1,000		
Emergency Assistance	1,000		
Mileage	15,000		
Site Support (rent to Kansas City, Missouri School District)	10,000		
Recreational Supplies, Equipment	2,000		
Training Conferences	15,000		
Activity, Meeting Costs	1,000		
Insurance	2,000		
Audit	8,000		
Transportation (agency vans)	10,000		
Agency Administrative Support			
Operating Expenses Subtotal		65,000	
Per-site Cost		150,000	
$150,000 x 15 sites			2,250,000
Total Annual Project Budget			2,654,750

ONE HUNDRED FOURTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515–6143

SUBCOMMITTEE ON HUMAN RESOURCES AND INTERGOVERNMENTAL RELATIONS

Christopher Shays, Connecticut
Chairman
Room B-372 Rayburn Building
Washington, D.C. 20515
Tel: 202 225-2548
Fax: 202 225-2382

MEDIA ADVISORY

For Immediate Release
July 28, 1995

Contact: Bob Newman
(202) 225-2548

Congressman Christopher Shays Schedules August 3 Hearing On Local Empowerment & Flexibility Act of 1995 (H.R. 2086)

(Washington, DC) -- Congressman Christopher Shays (R-CT), Chairman of the Subcommittee on Human Resources and Intergovernmental Relations, will convene a hearing on H.R. 2086, the Local Empowerment and Flexibility Act of 1995, a bill he introduced last week. The hearing was announced today by Congressman William F. Clinger, Jr. (R-PA), Chairman of the Committee on Government Reform and Oversight.

The bill would create a statutory framework to allow local governments greater flexibility in administering federal funds.

The hearing will be held Thursday, August 3, at 9 a.m. in Room 2247 of the Rayburn H.O.B.

"All local communities are different but federal regulations treat all communities the same," Shays said. "Local governments are eligible for hundreds of separate federal categorical grants to provide services and implement federal programs. These communities, however, are frustrated by regulatory handcuffs and red tape in terms of using these funds locally in the most effective manner."

"This bill addresses that problem," Shays added. "It permits variation in spending based on local needs, and it frees up more dollars for services instead of being drained away by burdensome administrative costs such as duplicate audits and unnecessary paperwork."

(more)

The lead-off witness will be Senator Mark Hatfield (R-OR), sponsor of the Senate counterpart of the Local Empowerment and Flexibility Act of 1995 (S.88), which has received favorable responses from the National Association of Counties, National League of Cities, and U.S. Conference of Mayors.

Other witnesses invited to testify are representatives from the General Accounting Office (GAO), Advisory Commission on Intergovernmental Relations, and the National Academy of Public Administration, as well as mayors and other local officials.

Shays said that to participate in the framework established by the bill, local governments would prepare a "Local Flexibility Plan" for the integration of federal funds. Local governments would identify all federal, state, local and private resources to be used as well as regulations which would need to be waived. The plan would include input from the community and would be approved by a federal "Flexibility Council."

Commenting on the importance of flexibility, Shays said, "Even in a federal/state funding relationship dominated by block grants, the principle of local flexibility should be part of the permanent federal statutory framework. Block grants come and go. Flexibility is always needed."

Shays pointed out that his bill would not increase federal spending but that "it should allow public money to go farther in serving community needs since program overhead costs would be greatly reduced."

The Human Resources and Intergovernmental Relations Subcommittee has oversight and reform jurisdiction over the agencies and departments of the federal government managing human service programs. It also is responsible for relationships between the federal government and state/local governments.

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ONE HUNDRED FOURTH CONGRESS

Congress of the United States

House of Representatives

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SUBCOMMITTEE ON HUMAN RESOURCES
AND INTERGOVERNMENTAL RELATIONS
Christopher Shays, Connecticut
Chairman
Room B-372 Rayburn Building
Washington, D.C. 20515
Tel: 202 225-2548
Fax: 202 225-2382

Witness List
for the August 3 hearing
on "H.R. 2086, the Local Empowerment and Flexibility Act"
in room 2247 RHOB at 9:00 a.m.

Panel One

Senator Mark O. Hatfield (R-OR)
Sponsor of S. 88, the Senate version of the Local Empowerment and Flexibility Act of 1995

Panel Two

Judy A. England-Joseph
Director, Housing and Community Development Issues, General Accounting Office (GAO)

Charles Griffiths
Director, Intergovernmental Liaison, Advisory Commission on Intergovernmental Relations (ACIR)

Carl W. Stenberg
Director, Center for Public Service at the University of Virginia, representing the National Academy of Public Administration (NAPA)

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Tel: 202 225-2548
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STATEMENT OF REP. CHRISTOPHER SHAYS
CHAIRMAN, HUMAN RESOURCES AND INTERGOVERNMENTAL RELATIONS SUBCOMMITTEE

HEARING ON H.R. 2086
LOCAL EMPOWERMENT AND FLEXIBILITY ACT OF 1995
AUGUST 3, 1995

This is our first hearing on H.R. 2086, the Local Empowerment and Flexibility Act of 1995, a bill Congressman Clinger and I recently introduced, and a bill similar to one considered by this Subcommittee in the last Congress.

The proposed legislation is designed to help solve the longstanding problem of fragmentation of federal government programs to assist distressed communities and their residents. The bill would create a statutory framework to give local governments greater flexibility in administering federal funds.

There are a dozen or more federal departments and agencies which now administer hundreds of programs in the areas of housing, economic development and social services. According to the GAO, these agencies seldom, if ever, coordinate their efforts because they have different statutory missions, a separate body of regulations to follow, and worry about losing control over their own resources.

All local communities are different, but federal regulations treat them all the same. Local governments are eligible for hundreds of separate categorical grants to provide services and implement federal programs. These communities, however, are stymied by regulatory handcuffs and red tape in their efforts to use these funds locally in the most effective manner.

(continued)

The Administration recognizes the problem.

A recent report of the National Performance Review stated: "The current system of federal grantmaking fragments the ability of government at all levels to address people's needs in an integrated manner. These problems have contributed to the frustration of individuals and families that depend on federal assistance, and have added to taxpayer and customer cynicism about government's ability to manage."

The President's National Urban Policy report (July, 1995) also concluded: "Federal agencies cannot possibly know what is best for each of America's diverse regions and communities. They cannot design a 'one size fits all' strategy..."

H.R. 2086 addresses this problem. It permits local variation in spending based on local needs, freeing up dollars for services that might otherwise be drained away by burdensome and high administrative costs, duplicate audits and paperwork.

Under the framework established by the bill, local governments would prepare a "Local Flexibility Plan" for the integration of federal funds. Local governments would identify all federal, state, local and private resources to be used as well as regulations which would need to be waived. The plan would include input from the community and would be approved by a federal "Flexibility Council."

Flexibility is important. Even in a federal/state funding relationship dominated by block grants, the principle of local flexibility should be part of the permanent federal statutory framework. Blocks grants come and go. Flexibility will always be needed.

This legislation will not increase federal spending and it will allow public money to go farther in serving community needs.

I am pleased to welcome all our witnesses here today. I particularly want to welcome our lead-off witness, Senator Mark Hatfield, sponsor of the Senate counterpart of the Local Empowerment and Flexibility Act of 1995 (S.88). His bill has already received favorable responses from the National Association of Counties, National League of Cities, and the U.S. Conference of Mayors.

We look forward to working with the Senator, governors, mayors and community groups to reach the goals of H.R. 2086.

#

MARK O. HATFIELD
OREGON

United States Senate
WASHINGTON, DC 20510-3701

Testimony before the House Subcommittee on Human Resources and Intergovernmental Relations

H.R. 2086 and S. 88
The Local Empowerment and Flexibility Act of 1995

The Honorable Mark O. Hatfield

August 3, 1995

Senator Mark O. Hatfield
Committee Statement
August 2, 1995

H.R. 2086 and S. 88, The Local Empowerment and Flexibility Act of 1995

I would first like to thank Chairman Christopher Shays for inviting me here to testify today and for the wisdom that he and Chairman Clinger have shown by introducing the Local Empowerment and Flexibility Act of 1995 in the House of Representatives.

My motivation for introducing the companion bill to H.R. 2086 in the Senate is two fold. First as a former governor of Oregon, I experienced the frustration expressed by many state and local authorities when federal policies do not make sense for their particular communities. Blanket standards from the federal government are incapable of taking into consideration the diversities of each locality. National policy objectives often stifle creativity at the state and local level because authorities are compelled to comply with rigid federal stipulations. In addition, as an Appropriator, I have witnessed first hand the shrinking pool of federal resources for local and state governments. This decline is unavoidable and we must now concentrate our efforts to making the most of the scarce dollars that are available.

As the debate over the budget continues, it is important to remember that long-term fiscal responsibility should not only depend upon cuts in spending. It demands a radical transformation in the way we do business as a government. Business as usual is no longer sufficient. We have finally realized that we can no longer spend more than we have, and the next step is to look to the innovators at the state and local level to see how they are making limited resources go further. From my experience as governor I have discovered that it is on these levels that much of the innovation and creativity in government takes place.

The federal budget outlook is growing increasingly bleak. Nondefense discretionary spending will decline 12% from 1995 spending levels by the year 2002, shrinking from its current level of 18 percent of the total federal budget, to 13 percent in 2002. As the attached chart indicates, total outlays in discretionary spending as a percentage of GDP have declined from 13.5 in 1962 to a projected 6 percent in the year 2000. It is this block of shrinking dollars that fund the grant programs that benefit local governments. In our efforts to reduce the deficit, discretionary dollars are becoming scarce. Faced with declining resources, we must turn our attention to developing the most efficient allocation of these dollars.

Permit me to provide one example from my home state that demonstrates a poor allocation of federal dollars. As a result of the Crime bill passed last year, Marion County in Oregon was the recipient of additional federal funds. These funds were a welcome addition to the community but the money came with many strings attached that prohibited the county from spending it where it was needed. Instead of using the funds to hire additional corrections officers to deal with the growing number of prisoners, the county was directed by federal law to spend the money only for hiring additional police. This federal mandate did not serve the best interests of the community of Marion County in their effort to fight crime. This example highlights the need for providing increased flexibility for state and local governments. The federal government was willing to spend federal dollars to help, but without flexibility, the needs of the county could not be addressed.

The federal government should compliment not hinder the efforts of innovators on the local level. The need to provide flexibility to local and state governments is immense. These localities need to be able to use their acquired funds in a manner suitable to the needs of their communities. While I was pleased with the passing of the Unfunded Mandates Reform Act of 1995, Congress has failed to examine the existing regulations that continue to hamper the innovation of local authorities. We need to replace program compliance and regulatory rigidity with local flexibility.

There are four crucial aspects to H.R. 2086. First, different governments of this nation have different strengths. The federal government does two things well: effectively establishing broad goals that tie us together as a nation and achieving certain economies of scale which cannot be attained at the local level. The federal government often forgets that local governments bring a great deal of resources to the table. Perhaps the greatest strength is that states and local governments are innovators. Local and state governments have demonstrated again and again that they find the most creative ways to tackle problems in solutions that fit the local context. Local governments are eligible for hundreds of separate federal categorical grants to provide services and implement federal programs. The number of these categorical grants has skyrocketed in the last decades. In 1972 there were 422 different types of categorical grants compared with 1993 in which there were a total 578. These grants often encumber local government with burdensome stipulations and requirements.

Secondly, the Local Empowerment and Flexibility Act will not only permit variation in how local governments meet national goals, but it will encourage solutions that best fit the local context. Federal laws and regulations have tended to treat every area of the county the same. Universal requirements force Congress to legislate to the lowest common denominator, and consequently, few governments perform to their full capability. We all strive to meet the average instead of to excel. Politically, socially, structurally, local and state governments are very different from one another. Adding flexibility to the federal/state relationship will encourage local governments to find solutions that fit the local context. In addition, providing flexibility will eliminate regulations that force local governments to "solve" problems that they do not have. Many programs are narrowly designed which means dollars end up mired in audits and record-keeping rather than directed to meet community needs. While the well-intentioned programs of the New Deal and the Great Society put safety nets in place for those who are in greatest need, these nets now strangle the federal government by tying up precious funding in a knot of regulations and poor management.

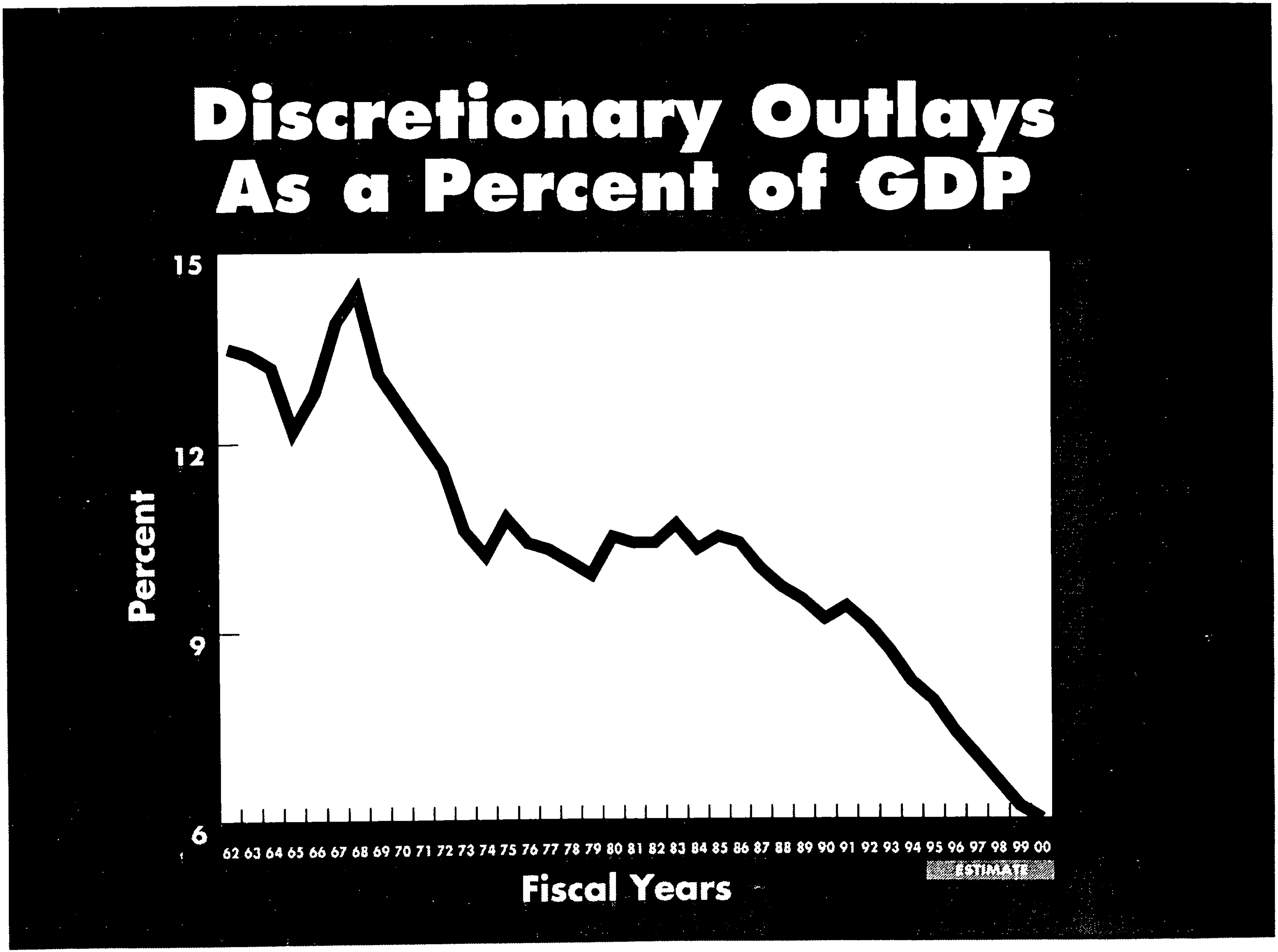
Thirdly, this legislation will create a new system of accountability. Currently, the federal government holds state and local governments accountable through regulation, procedures and paperwork. The existing accountability structure is very good at determining where federal money is spent, but it tells us very little about whether we are actually achieving results. Hundreds of hours and scarce dollars are invested in complying with these regulations, and the investment in bureaucratic processes does nothing to improve the quality of services that we deliver to citizens. Moreover, our current structure of accountability has made us very responsive to each other, rather than to the people we serve We need to re-orient our system of government to view taxpayers as investors and our citizens as customers of the business of government.

Finally, we must also help re-tool all governments for this new relationship. We need to re-equip our nation's governments to function in a new cooperative environment. The federal bureaucracies need to re-create the ability to listen to local governments. In the 1980s, we witnessed the destruction of the "intergovernmental" affairs offices at most federal agencies. The federal government must actively solicit and use the ideas and experience of state and local governments.

My bill, S.88, and H.R. 2086 are designed to create a new spirit of cooperation among federal, state, and local governments. It will lead to strategic and realistic decentralization and deconcentration of power throughout the government. Governments will be allowed to combine their different strengths to achieve their objectives. It will also permit variation in how local governments meet national goals, encouraging solutions that best fit the local context.

The Republican-controlled Congress has committed itself to a more efficient, cost-effective approach to governing. This commitment is highlighted in a letter sent to the President in December of last year signed by Senate Majority Leader Bob Dole, and Speaker of the House, Newt Gingrich. The letter suggests that the President, "recommend actions to give state, local, or tribal governments more flexibility to meet federally-imposed responsibilities." Providing local flexibility has also enjoyed a wide array of bipartisan support. In February of 1994, the Senate voted 97-0 in favor of a demonstration project for education flexibility along the same lines as this legislation. While that project provided for 6 test sites throughout the country, due to its effectiveness, all 50 states have expressed interest in the program.

I would like to thank the Committee again for the opportunity to testify. I look forward to seeing the Local Empowerment and Flexibility of 1995 become the launching point for this country's greatest innovators, the state and local government of this nation.



Discretionary Outlays
As a Percent of GDP
15
12
9
6
Percent
62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00
ESTIMATE
Fiscal Years

United States General Accounting Office

GAO

Testimony

Before the Subcommittee on Human Resources and Intergovernmental Relations, Committee on Government Reform and Oversight, House of Representatives

For Release on Delivery
Expected at
9 a.m. EDT
Thursday
August 3, 1995

COMMUNITY DEVELOPMENT

Challenges Face Comprehensive Approaches to Address Needs of Distressed Neighborhoods

Statement of Judy A. England-Joseph,
Director, Housing and Community Development Issues,
Resources, Community, and Economic Development Division

GAO/T-RCED-95-262

Mr. Chairman and Members of the Subcommittee:

We are pleased to be here today to participate in your hearing on the Local Empowerment and Flexibility Act of 1995, whose purpose is to create increased flexibility for local governments and private nonprofit organizations using federal programs to assist communities and their residents. The act would, among other things, create a council composed primarily of cabinet-level officials to review and approve local plans that could include requests to waive federal requirements.

Our testimony is based primarily on our February 1995 report on community groups that are using a multifaceted--or comprehensive--approach that relies on residents' participation to address housing, economic, and social service needs in distressed neighborhoods.[1] Comprehensive efforts are often begun out of the frustration of residents regarding neighborhood conditions and the dissatisfaction of assistance providers with the results of more limited approaches. In our February report we examined (1) why community development experts and practitioners advocate this approach, (2) what challenges they see to its implementation, and (3) how the federal government might support comprehensive approaches. The report incorporated information obtained during our review of four organizations that are applying a comprehensive approach for improving their respective communities.[2]

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[1] Community Development: Comprehensive Approaches Address Multiple Needs but Are Challenging to Implement (GAO/RCED/HEHS-95-69, Feb. 8, 1995).

[2] The four organizations we studied were (1) the Core City Neighborhoods in Detroit, Michigan, (2) the Dudley Street Neighborhood Initiative in Boston, Massachusetts, (3) the Marshall Heights Community Development Organization in Washington, D.C., and (4) the Neighborhood Housing Services in Pasadena, California.

In summary, we reported that community development experts advocate comprehensive approaches to address the problems of distressed neighborhoods because such complex, interrelated problems are better addressed in tandem than individually. The comprehensive approach was endorsed by the Department of Housing and Urban Development (HUD) in March 1994. Several national foundations--frustrated with the results of programs they previously funded--have begun funding organizations that are taking a comprehensive approach.

Multiple challenges confronted the four organizations we studied. The organizations had to, among other things, piece together a complex web of funding from several private and public sources to cover program and administrative costs. Overall, the groups relied on public funding--often with conditions and/or restrictions on its use--for 30 to 60 percent of their budgets. The organizations also faced the onerous task of managing a diverse set of concurrent housing, economic development, and social service programs.

The federal government assists distressed urban communities and their residents through a complex system involving at least 12 federal departments and agencies.[3] Together, these agencies administer hundreds of programs in the areas of housing, economic development, and social services. These agencies have tended not to coordinate their efforts with one another because they have separate missions and have been concerned about losing control over their own resources. In addition, the federal efforts to

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[3]The Departments of Agriculture, Commerce, Education, Health and Human Services, Housing and Urban Development, the Interior, Justice, Labor, Transportation, and the Treasury; the Environmental Protection Agency; and the Small Business Administration operate programs available to distressed communities. Other agencies, such as the Department of Defense, also operate programs that may be regarded as assisting distressed urban communities under certain circumstances.

coordinate that have been undertaken have had few successes, leaving community organizations--such as the ones we reviewed--with the burden of trying to piece together programs to serve their communities.

BACKGROUND

Despite overall economic growth in the United States during the 1980s, the economic and social health of many cities declined. While crime, poverty, and the physical and social deterioration of urban neighborhoods increased, intergovernmental aid to cities declined between 1980 and 1993 by about 19.4 percent in constant dollars. Meanwhile, the out-migration of many middle-income residents and businesses has caused city tax bases to shrink, hampering the ability of local governments to assist economically and socially distressed areas suffering from a mix of interrelated problems.

Over the past several decades, the public and private sectors have tried different strategies to assist people living in distressed communities. Some of these efforts have focused on improving the chances for individuals in these areas to obtain the education, social services, and other support that they need in order to leave their neighborhoods. Others have focused on improving the neighborhoods' physical environment through affordable housing or economic development. Still others have combined aspects of both approaches by addressing the needs of residents and their environment. These latter efforts are referred to as comprehensive by community development experts because they consider the housing, economic development, and social service needs of communities and are considered community-based because they focus on specific geographic areas and involve the residents in the planning and implementation. Comprehensive community-based efforts have often begun within communities in response to neighborhood conditions--rather than in response to a federal program--and are operated by local nonprofit organizations.

COMPLEX PROBLEMS CALL FOR COMPREHENSIVE APPROACHES

According to the experts we consulted, comprehensive approaches enhance the chances of improving conditions in distressed neighborhoods because the problems in these areas are complex and interrelated. Addressing these problems in tandem, the experts believe, makes long-term results possible. In addition, the experts said that comprehensive approaches are more viable now than they were in the past because community organizations have gained experience and an infrastructure has evolved to provide funding and technical assistance. However, the experts cautioned that conditions in distressed neighborhoods cannot be quickly reversed and that the outcome of much of the work these groups do--community outreach, counseling, and referral services--is hard to quantify, making evaluation of the results difficult. The comprehensive approach was endorsed by HUD in March 1994 in a publication in which the Secretary wrote, "We believe the best strategy to community empowerment is a community-driven comprehensive approach which coordinates economic, physical, environmental, community, and human needs." Dissatisfied with the results of previous single-focused approaches to community revitalization, national organizations and foundations have begun funding organizations that are taking a comprehensive approach.

COMPREHENSIVE APPROACHES ARE DIFFICULT TO IMPLEMENT

Multiple challenges confronted the four organizations we studied. All experienced substantial difficulty organizing residents, gaining their trust, and maintaining their involvement. All four organizations said that residents needed to see a tangible result--rehabilitated housing or a cleaner neighborhood--before they wanted to participate. Obtaining financial support and managing a diverse set of concurrent programs also presented significant challenges. The four organizations relied on a myriad of public and private funding sources, such as federal block grant and program-specific funding, foundation grants, and corporate donations. Overall, the organizations relied on public funding--often with conditions and/or restrictions on its use--for 30 to 60 percent of their budgets. After obtaining funds, the organizations faced the challenge of concurrently managing multiple programs, each with several separate funding sources, application requirements, and reporting expectations.

The four organizations we studied responded to the challenges confronting them in a variety of ways. They obtained residents' support by including residents in their planning and decision-making. They also used the multiple funding sources and collaborations to leverage resources that could then be applied over a wide range of needs in the communities. In addition, each organization had access to some relatively flexible funding--either public block grants or private foundation funds--that enabled it to set priorities consistent with its community's needs. Finally, the organizations built a cadre of experienced staff to administer and manage the array of programs.

FRAGMENTATION OF FEDERAL PROGRAMS IS BURDENSOME TO COMMUNITIES

The federal government assists distressed urban communities and their residents through a complex system involving at least 12 federal departments and agencies. Together, these agencies administer hundreds of programs in the areas of housing, economic development, and social services. For example, we reported that there are at least 154 employment and training assistance programs, 59 programs that could be used for preventing substance abuse, and over 90 early childhood development programs.[4] Considered individually, many of these categorical programs make sense. But together, they often work against the purposes for which they were established, according to a National Performance Review report.

In addition, there has traditionally been little coordination among the many federal departments and agencies with the responsibility for administering the programs that can be used to assist distressed communities. Agencies have tended not to coordinate efforts with one another because they have been protective of their own resources and separate organizational missions.

The proliferation of federal programs and the lack of coordination among agencies impose a burden on local organizations that attempt to piece together programs to serve their communities. The neighborhood organizations we studied found it burdensome to manage multiple programs with individual funding streams, application requirements, and reporting expectations. In addition, one organization reported that it had strained its managerial and financial systems to meet federal record-keeping and accounting standards for several funding sources. While the organization implemented the necessary procedures to comply with the standards, officials said that the administrative burdens nearly forced the organization to reduce the scope of its services.

We see the potential for ongoing efforts to make federal programs more accessible to community organizations. As you know, the Empowerment Zone and Enterprise Community program allowed

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[4]See Multiple Employment Training Programs: Major Overhaul Is Needed (GAO/T-HEHS-94-109, Mar. 3, 1994), Drug Use Among Youth: No Simple Answers to Guide Prevention (GAO/HRD-94-24, Dec. 29, 1993), and Early Childhood Programs: Multiple Programs and Overlapping Target Groups (GAO/HEHS-95-4FS, Oct. 31, 1994).

communities to request waivers to federal requirements.[5] In addition, the President established the Community Enterprise Board to, among other things, assist with the implementation of the program. In their applications for this program, urban applicants requested over 1,000 waivers. Almost 60 percent of the requests will require statutory changes. The Local Empowerment and Flexibility Act of 1995 includes provisions for a similar board to review and approve local plans for flexibility and requests for waivers. If such a board is to fulfill its mission, it will require the commitment of high-level agency officials and open dialogue among the agencies.

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Mr. Chairman, this completes my prepared statement. I would be pleased to respond to any questions that you or Members of the Subcommittee may have.

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[5]The Empowerment Zone and Enterprise Communities (EZ/EC) program was adopted in 1993 under the Omnibus Budget Reconciliation Act. This program promotes the comprehensive revitalization of distressed communities by funding broad, community-based strategic plans.

NAPA
National Academy of Public Administration
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Chartered by Congress

STATEMENT OF

CARL STENBERG
CHAIR
STANDING PANEL ON THE FEDERAL SYSTEM

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

BEFORE THE

HOUSE SUBCOMMITTEE ON HUMAN RESOURCES AND INTERGOVERNMENTAL RELATIONS

HEARING ON

H.R. 2086, LOCAL EMPOWERMENT AND FLEXIBILITY ACT OF 1995

August 3, 1995

1120 G Street, N.W., Suite 850, Washington, D.C. 20005-3801 (202) 347-3190, FAX (202) 393-0993

Good morning Mr. Chairman, Representative Towns, and members of the Subcommittee. I am Carl Stenberg, director of the Center for Public Service in Charlottesville, Virginia and a Fellow of the National Academy of Public Administration. I appear before you today in my capacity as chair of the Academy's Standing Panel on the Federal System. The Academy is delighted with the opportunity to supply input for your consideration of important reforms to federal categorical grants and the intergovernmental systems for administering them.

The Academy is an independent, nonpartisan, nonprofit organization chartered by Congress to identify emerging issues of governance and to provide practical assistance to federal, state, and local governments to improve their performance. The Academy's unique resource is its membership -- more than 400 current and former members of Congress, cabinet secretaries, senior federal executives, state and local officials, businesspersons, diplomats, journalists, and civic activists who are elected by their peers.

The Alliance for Redesigning Government was created in 1993 as part of the Academy. The Alliance's mission is to help generate a dramatically more effective system of governance by connecting and supporting people at the federal, state, and local levels who are developing new and better ways to make government work. Through the Alliance's bimonthly newsletter, *The Public Innovator*, this network is up-to-date on cutting-edge practices and reforms being implemented. As always, the Academy stands ready to share its resources with this subcommittee and the rest of Congress.

First, we want to express our appreciation to the bill's sponsor and this subcommittee for sparking discussion on a series of issues that are vital to our nation's future. H.R. 2086 (and its companion S.B. 88) propose important steps toward upholding the *golden rule* and challenging the wisdom of the *golden rule of public administration*.

The golden rule, of course, is "Do unto others as you would have them do unto you." If federal officials who enact and administer categorical programs were required to rotate jobs from time to time with those on the front line of developing and implementing programs, we would no doubt see less "doing unto" and some significant "undoing" of restrictions and red tape.

The federal categorical grants system has grown like topsy. A 1995 study by the Advisory Commission on Intergovernmental Relations (ACIR) reports that there were 618 categorical programs available to state and local governments in the federal system as of January 1, 1995. The count included 110 education programs, more than 100 health care grant programs, 82 social service grant programs, and close to 30 grant programs dealing with community and regional development.

As the number and variety of categorical grants has grown, so too has the list of requirements and restrictions imposed through both statute and regulation. Born of good intentions, in practice they can hinder or frustrate effective efforts to achieve the ambitious goals these programs have established. Negotiating the maze of mandates related to planning, applying for, and administering some of these programs would test the patience of Job and the wisdom of Solomon.

It also imposes significant compliance costs. Scarce resources are diverted from the intended recipients to administration and overhead. In his statement introducing S.B. 88, Senator Mark Hatfield starkly stated the problem: "Many of these programs are too narrow and regulatory rigidity translates into funding spent wastefully in audits and record-keeping rather than directed to meet community needs."

The golden rule of public administration is equally succinct: "He who has the gold, makes the rules." In exercising their duties, federal officials are exercising a sacred public trust. You must ensure that the public's money is allocated to meet our highest priorities and that each and every taxpayer dollar is used as effectively as possible. Generally, the intergovernmental system has sought to meet this obligation by imposing a series of processes, management, accounting, and reporting requirements.

However, depriving our partners in the intergovernmental system of discretion that could produce misbehavior also limits the discretion that could call forth outstanding innovation and achievement of important and legitimate public responsibilities. That doesn't mean the federal government should hand out blank checks. It does mean a more balanced approach that gives greater flexibility to make the system work and at the same time requires accountability for achieving results -- a difficult balancing act.

In the kind of overly centralized, prescriptive system that's been created, we also pay a price for limiting the ability of others to experiment and to learn how to get the public's work done better, faster, or cheaper. Setting priorities and ensuring accountability for producing real results are the responsibility of top policymakers and political leaders. Dictating the details of the strategies, methods, and procedures applied to meet those goals may be counterproductive, however. The control of discretion and resources does not guarantee that the holder has a monopoly on the knowledge about how to adapt and respond to the disparate needs of communities across the country. America is too diverse for "one size fits all" policies and programs. Administrative "stovepipe" mentality precludes addressing functionally related needs. To be effective, federal, state, and local programs must recognize the differences among our communities, permit variation in spending and administration based on local needs and changing conditions, and seek to provide flexibility while enhancing accountability for results that really matter.

During the 1980s, corporations around the world learned a powerful lesson. If the gap between those with the power to decide and those on the production line or in the front line with consumers grows too large, the businesses' vitality and profitability sag. The federal government specifically -- and the public sector generally -- should learn how these lessons apply to the public service.

Public and nonprofit organizations at the state and local level are the front line in our intergovernmental partnership. They are the vital key to achieving the best possible performance. Rather than enforce compliance with rigid rules, we should challenge these capable and committed people to apply the full measure of their skills, creativity, and adaptability to achieving results for communities and people. The good news is that there is a wellspring of promising innovations at the state and local levels and from community-based and other nonprofit organizations that others can learn from.

The bad news is that the burden of federal compliance and oversight measures can be overwhelming and often wasteful and detrimental to achieving program goals. For example, in Multnomah County, Oregon, a local community college leads a consortium that has integrated a wide range of services and is showing remarkable success in supporting the transition from dependency to work for local welfare recipients. A portion of the funds are provided by the Job Training Partnership Act (JTPA). The JTPA link created two administrative problems. First, although JTPA funding amounts to less than 10 percent of the community college's overall funding, a separate accounting process is required to meet JTPA's precise financial monitoring and reporting requirements. Second, in some cases equipment purchased with JTPA funds cannot be used by clients or students who do not meet JTPA eligibility requirements. To comply with the letter of the law, some equipment would be left idle when it could be put to fuller use with clients who are not JTPA eligible.

To achieve the highest level of performance, we should create systems that are capable of continuous learning and adjustment. Prescriptive systems place too much emphasis on outmoded "command-and-control" models and too little emphasis on flexibility with accountability for meeting ambitious performance goals and cross-cutting needs.

We can and must do better. H.R. 2086 is a good starting point in at least five respects:

- <u>First, authorizing Local Flexibility Plans creates a powerful incentive for the most innovative local governments and nonprofit organizations to pioneer new approaches to meeting pressing social needs</u>. It will help demonstrate the efficacy of placing greater emphasis on aligning public and nonprofit resources through a "bottom up" process. State governments are also an important conduit for categorical programs and provider of services and we urge you to consider expanding the bill to include State Flexibility Plans as well. The broadening of the scope of the Flexibility Plan approach has merit in view of the fact that relatively few direct federal-local grant programs currently exist.

- <u>Second, the bill would require participants to "specify goals and measurable performance criteria,"</u> to monitor and report performance against these goals, and to provide for a "comprehensive evaluation" of the impacts and costs. All are important steps toward more results-oriented governance systems.

However, the proposal may benefit from greater specificity on the procedures for ensuring accountability. The "Evaluation and Termination" provisions would require annual reports on activities under each approved Local Flexibility Plan. Periodic reporting will be necessary, but it may be better to authorize the Flexibility Council to establish reporting periods appropriate for individual cases. Further, rather than emphasizing termination of plans when goals and performance criteria have not been met, the proposal should stress prompt consultation between the federal agencies and the local authorities and the opportunity to adjust both the flexibility plan and its goals and measurable objectives based on experience and changing conditions. Ambitious goals may not be met by successful programs, just as modest goals can be met by failing programs.

- Third, the bill recognizes the importance of developing data bases, planning, and evaluation processes in building more results-oriented governance systems. Policymakers too often assume data are available -- reliable, current, and with appropriate geographical coverage -- to support effective benchmarking, performance monitoring, and reporting. This is not generally the case. Data systems and collection efforts should be improved to meet the uses envisioned. Confidentiality requirements, such as those that limit the use of Social Security Numbers as identifiers, can limit the utility of administrative data bases for these purposes. In many cases, integrating administrative data bases across an array of state and local programs will be the best method for tracking results. On the federal level, proposals to reduce funding or limit the type of social and demographic data to be collected in the next census would also hamper performance measurement. Both are issues that merit congressional attention.

- Fourth, the proposal creates a feedback system by requiring reports on the federal regulations most frequently waived under this new authority. Congress should consider giving an "early out" to statutory and administrative restrictions that are identified as outmoded in the course of implementation and evaluation of Local Flexibility Plans. To do so, you may consider a process similar to the system used to review and recommend the closure of military bases. The most frequently granted waivers of statutory and regulatory restrictions could be reviewed by a nonpartisan panel. They would recommend which of the many individual changes should be considered in a single package in the legislative process. There should be some mechanism to trigger congressional action to allow broader exemption from general rules when identical or similar waivers arise from separate jurisdictions and from across the jurisdictions of a number of authorizing committees.

- Finally, section 10 of the proposal will help ensure that technical assistance will be available to local governments and others involved in designing flexibility plans. This is a desirable feature in view of the complexity of and inadequate information available about applying this new approach. While federal agencies can be an effective provider of such assistance, you may consider broadening the range of options by authorizing or directing the agencies to support technical assistance provided by others -- such as ACIR, state governments, state and national associations of public officials, and NAPA and other organizations with existing capacity to provide effective technical assistance and support.

The 104th Congress has dedicated itself to addressing fundamental issues in our system of governance. In his January 4, 1995 address to the opening of this session, Speaker Gingrich declared: "We should insist that our success for America is felt in the neighborhoods, in the community, is felt by real people leading real lives who can say 'yeah, we're safer, we're healthier, we're better educated, America succeeds.'" In light of the critical role the state and local public and nonprofit sectors play in meeting those goals, the reforms and exciting challenges presented by this proposal would be a good step toward translating the speaker's and this Congress' vision into reality.

Thank you Mr. Chairman for the opportunity to share NAPA's viewpoint on this important proposal. I would be happy to answer any questions you or other members may have.

ADVISORY

COMMISSION ON INTERGOVERNMENTAL RELATIONS

WASHINGTON, D.C. 20575

Statement by
CHARLES GRIFFITHS
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U.S. Advisory Commission on Intergovernmental Relations

Hearing of the U.S. House
Committee on Government Oversight and Reform
by the
Subcommittee on Human Resources
and Intergovernmental Relations

LOCAL EMPOWERMENT & FLEXIBILITY ACT

Thursday, August 4, 1995
Washington, DC

Mr. Chairman, I appreciate the opportunity to comment on H.R. 2086, the *Local Empowerment and Flexibility Act* of 1995.

My remarks today are from the perspective of a staff member of the Advisory Commission on Intergovernmental Relations. The Commission itself has not taken a position on either H.R. 2086 or its companion legislation, Senate Bill 88, that has been introduced by Senator Hatfield.

I hasten to add, however that I believe the Commission would endorse the general purposes and thrust of this legislation. For over two decades, ACIR has stressed the need for the type of federal assistance reform embodied in H.R. 2086.

Mr. Chairman, I have worked in the intergovernmental arena for nearly 25 years. Prior to coming with the ACIR, I served as Chief of Federal Program Coordination for the Commonwealth of Pennsylvania, and then served as Director of the Pennsylvania Intergovernmental Council, a state-local body similar to ACIR.

I am well acquainted with the growth, benefits, and problems associated with federal assistance. In a sense, state and local governments have had a "love-hate" relationship with federal aid. These governments have certainly appreciated the help that federal aid has been in critical program areas. At the same time, though, these governments have had to endure federal program structures, processes, and requirements that often frustrated state and local efforts to apply and manage this assistance effectively and efficiently.

In response to the frustrations expressed by state and local governments, there have been numerous efforts over the years to reform the federal aid system, by streamlining and simplifying it in ways intended to increase effectiveness and efficiencies. Some of these efforts were successful in whole or part, while others simply failed.

I believe that the overriding ingredient of successful reform is a **commitment to success.** This ingredient has three important characteristics:

> A ***long-term outlook*** that gives the sense that the initial resolve and energy behind the reform is enduring and will not dissipate with time;
>
> ***Flexibility*** that allows for adaptation and refinement; and
>
> The ***avoidance of excessive complexity*** in the objectives being sought, and the processes involved. The results must be truly cost-effective, and time-saving.

Mr. Chairman, I believe that H.R. 2086 already embodies the first two of these important characteristics. There can be no doubt of the long-term resolve of this Congress and the President to reform the current federal aid system. This legislation can be seen as part of that reform effort.

The very heart of H.R. 2086 is the flexibility it endeavors to bring to this reform. Its focus is on outcomes as opposed to rigid procedures. Federal agencies, as well as local governments are given considerable leeway to adapt federal assistance to specific needs and circumstances.

As to the last characteristic, I believe there is room for further refinements to avoid undue complexity, while making the process more cost-effective and time-saving. Most of my remaining comments speak to this point.

Before turning to those comments, I would like to briefly outline two past reform efforts that I believe are instructive, and which help to set the foundation for my suggestions.

Integrated Grant Administration

The Integrated Grant Administration (IGA) was initiated in 1972 by OMB, as a test for simplifying the funding and administration of federal program assistance.

The central objective of the IGA was to simplify the process by which state and local grantees identified, applied for, and administered funds comprised of more than one Federal assistance program to carry out a single project. Initially, the only programs excluded were those supporting construction or the acquisition of land. Later, even these exclusions were lifted for some demonstration projects.

Federal Regional Councils (FRCs), which were in place at that time, were given the primary responsibility for liaison with state and local governments, and to coordinate the packaging of IGA applications.

To qualify as an IGA project, the federal programs involved had to be included in a single application, be related by a common purpose or ability to support related goals, and based on an overall strategy to achieve a common objective.

One Federal agency "point-of-contact" was be appointed to process each consolidated application, rather than making an applicant deal with multiple federal agencies. A single grant award notice was issued with synchronized funding periods. Funding was "pooled" from the different federal agencies, and delivered as a single funding stream through one federal agency.

Grantees were required to submit single financial reports to a single federal agency. These reports were guided by one set of coordinated federal requirements to monitor progress.

It should be noted that the IGA provided no additional funds to grantees other than what they were already eligible to receive, and which had been appropriated.

The IGA began with 24 approved projects totaling over $33 million dollars. OMB's first assessment of the program was a favorable one. For example, the assessment found that the IGA promoted improved intergovernmental working relationships.

On the other hand, assessments by OMB and GSA found a need for greater commitment on the part of federal agencies for participating in this program. Problems of "turf", as well as statutory barriers to program consolidation were seen as stumbling blocks to agency cooperation.

It was also found that the IGA required more time and effort by federal agencies than what would be normally expected with individual categorical grants. Observers believed this to be an normal part of the "learning curve", and not necessarily a long-term condition.

This latter finding suggested that significant changes to existing financial assistance processes require several years to implement and refine, before their full potential could be realized.

Joint Funding Simplification Act of 1974

Based on the encouraging experience of the IGA, the House Subcommittee on Intergovernmental Relations held "New Federalism" hearings in 1974.

At the time, H.R. 11236, the *Joint Funding Simplification Act*, was before the Subcommittee. The purpose of this legislation was to embody the essence of the IGA experiment.

In the hearings on this legislation, it was again stressed that it takes time to implement and perfect significant changes to the federal aid system. It was pointed out, for example, that the early years of the IGA tended to concentrate more on procedural issues than substantive outcomes.

The *Joint Funding Simplification Act* was enacted in 1974. The three purposes of the act closely resemble the purposes of H.R. 2086:

- ♦ Enable states, local governments, and private nonprofit organizations to use assistance of the United States Government more effectively and efficiently;
- ♦ Adapt the assistance more readily to particular needs through wider use of projects that are supported by more than one executive agency, assistance program, or appropriation....; and
- ♦ Encourage Federal-State arrangements under which local governments and private nonprofit organizations may more effectively and efficiently combine Federal and State resources to support projects of common interest to those local governments and those organizations.

Some of the key provisions of this act included:

- ◊ Requiring the President to promulgate regulations to assure that the act was applied by all federal agencies consistently, in accordance with the purposes of the act;
- ◊ Authorizing federal agencies to identify programs suitable for joint funding, and to develop guidelines and common application forms;
- ◊ Authorizing federal agencies to modify administrative requirements that might impede joint funded projects;

- ◊ Permitting the Administration to develop a system for designating "lead agencies" to coordinate the review of joint programs applications, and for overseeing projects that are approved;
- ◊ Authorizing the creation of "joint management funds" to finance multipurpose projects, into which the participating agencies could transfer their share of the funding to be paid out by the "lead agency"; and
- ◊ Permitting federal agencies to determine a single "non federal matching share" for each project, where such requirements applied.

It is interesting to note that this act also permitted a federal agency to enter into joint funding agreements with states, where a single federal program could be jointly funded with a single state program, and granted to a local government for implementation.

After becoming law, and in successive executive orders, oversight of this act was given first to GSA, and then later to OMB. The act was authorized for five years. In 1980, the act was reauthorized for another five years. However, in 1982, this act, along with a number of other laws considered to be obsolete or ineffective, including the *Intergovernmental Cooperation Act* of 1968, were repealed.

I have been unable to find any significant evaluations of the *Joint Funding Simplification Act*. I did find, however, passing comments about the act that lead one to the conclusion that act never really got off the ground. Some who remember the act believe that there was never a strong commitment on the part of federal agencies to make this process work (because of the difficulties of crossing agency and program boundaries). Those state and local governments who knew about the act (and this was not a large number), found it difficult and time-consuming to pursue joint funding, and therefore became less interested in attempting to do so.

H.R. 2086

I believe that H.R. 2086, in combination with current block grant reforms, provides an important opportunity to address grant assistance issues that have bothered state and local governments for many years.

The suggestions below attempt to build on the lessons of the past, and to reflect the circumstances found today.

Governmental Focus

H.R. 2086 focuses on local governments. This is understandable because local governments are on the "front-line" for achieving most federal policy objectives. The success of these objectives rests largely on the ability of local governments to apply and manage federal and state funding as effectively and efficiently as possible.

H.R. 2086 attempts to strengthen local abilities by providing increased flexibility for local officials to pursue federal objectives in a cost-effective manner most suitable to local circumstances and needs. Greater flexibility will enable local officials to better coordinate and achieve federal, state, and local priorities.

H.R. 2086 is particularly useful to smaller and rural communities that lack the capacities to obtain and manage federal programs. In effect, these communities are not able to participate as full partners in our intergovernmental system for no other reason than their size.

Nonetheless, I believe that the purposes of H.R. 2086 are important objectives for all governments, including state and Tribal governments. H.R. 2086 is concerned with achieving maximum economies and efficiencies in the use of federal funds, by focusing on outcomes rather than rigid requirements and processes. Certainly these are worthy goals for state and tribal governments as well.

In addition, we are now in a period of dramatic reforms of American Federalism. These reforms will result in shifting roles and responsibilities, including how federal money is distributed and applied. The movement towards consolidating and blocking federal programs at the state level will result in stronger state-local assistance relationships. These changes will give states a greater role and involvement in the kind of "local empowerment and flexibility" envisioned by H.R. 2086. Not to give states and tribal governments the same flexibility is to leave out a very important component that can be critical to the purposes of the act, and to federal reform efforts.

Purposes

The purposes of H.R. 2086 are meritorious. But I would like to make two suggestions that believe would help to clarify the intent of the legislation.

First, the bill's focus appears to concentrate on consolidating two or more federal programs or appropriations. **I believe that it is also important to provide the flexibility for federal and state agencies to join programs that can serve a common purpose at the local level.** This may involve the pooling of funds through a single administering agency, and/or synchronizing time periods, regulatory requirements, and reporting. I would add here that this flexibility should be available even if only one federal program is involved.

> **Perhaps the bill's language could be changed under Section 3.(3), that includes a new subsection (C) to read: "integrating one or more federal programs or appropriations with one or more state programs."**

Second, **I believe one purpose of the bill should be to streamline federal planning requirements,** by providing common standards that can be met by applicants with existing comprehensive plans that are up-to-date and reasonably adequate. This is particularly important to smaller local governments. Federal planning requirements are costly for small communities, and more so if they have to develop separate plans for each federal program.

> **This purpose could be made clear if, under Section 3, a new (2) were inserted as follows: "reduce local government costs by streamlining federal planning requirements, and by allowing communities to use existing, updated comprehensive plans for federal program planning purposes**

Definitions

The definition of "eligible local government" does not appear to include entities other than a single government. It does not, for example, appear to include Councils of Government, or other regional bodies that may be eligible to receive federal assistance. For rural areas, these regional entities often serve groups of local governments in certain programmatic areas because they have a greater capacity to do so.

I believe that the term "eligible local government" should be changed to "eligible applicant", and that the definition include local governments, councils of governments, qualified regional bodies, and states if my previous suggestion is included.

If regional bodies are not included, it may remain difficult if not impossible for some smaller governmental bodies to participate (even with increased flexibility) because they lack the capacity or expertise.

One important benefit of having regional bodies listed as "eligible applicants," is that these entities could than prepare a single Flex Plan for two or more smaller communities. As the bill is now written, if several local governments wished to cooperate in a joint program endeavor, the bill would require separate flexibility plans and assurances from each community. It would be much more cost-effective ***if a regional body could develop a single plan***, with assurances of participation and public hearings by the participating governments.

Application Review and Approval of Flexibility Plans

H.R. 2086 creates a *Flexibility Council* at the federal level to receive local flexibility plan proposals, to approve or disapprove applications, and to provide technical assistance if requested and feasible. The bill gives agencies the authority to detail personnel to the Council. Given the current fiscal situation, it is likely that detailed personnel would be required.

I have several suggestions related to this part of the bill which I believe would be less expensive but more effective for the Federal Government, and which would be more consistent with the Federalism reforms now underway.

First, I believe that the Federal role should be as minimal as possible. This can be done by **giving the states an *optional* coordinating role for processing local Flex Plan proposals**, and also for **recommending approval actions to the Flexibility Council.** States are in a much stronger position to evaluate the circumstances and merits of local proposals. This would reduce the workload (and cost) at the Federal level, and the time required to make final decisions.

- In turn, states could opt to use sub-state regional bodies as the *first level* of review and comment as a means to reduce their workloads. This would be particularly relevant in rural areas which are often served by regional planning agencies such as Rural Development Councils.
- As a means to offset the costs of this state role, states could be allowed to include these costs as indirect costs under the *Federal Cash Management Act*. This would amount to minor losses to the Federal Treasury, that would be more than offset by the reduced Federal costs for reviewing local applications.
- The direct role (and cost) for the Flexibility Council would be lessened as more states opt to serve this coordinating function.

One other option to consider in this regard is to permit interstate bodies the opportunity to coordinate appropriate flex plan reviews and recommendations. An example of an interstate body is the Appalachian

Regional Commission, and there is legislation today that would create similar regional Economic Development Commissions to succeed the Department of Commerce. These interstate bodies consist of federal and state representation, and are therefore ideal for this role.

Second, we can take the lesson of past experience with the IGA and *Joint Funding Simplification Act*, by giving the Flexibility Council the authority **to designate "lead agency" responsibility for different types of Flex Plans.** This would minimize the need for detailing staff to the Council, and place review decisions in agencies with relevant experience and program relationships.

- That would leave the Flexibility Council primarily with an oversight responsibility, including reporting to the Congress and President about the issues and achievements under the law.
- With respect to the Council, the current *Community Empowerment Board* (CEB) would be an appropriate structure to be assigned this responsibility.

Finally, this bill does not speak to a very important issue, which is the need to simplify application requirements and costs. A major component of this need is to make clear that **the Flexibility Plan of an applicant will satisfy the application requirements** for all of the Federal programs included in the Plan.

If the Flexibility Plan is simply an additional layer on top of individual program applications, the bill will fail to provide the cost and time savings intended under the law. This provision would also help to stimulate greater inter-agency coordination and cooperation at the Federal level with respect to the standardization of processes and requirements.

Program Waivers

Program waivers are a critical aspect of H.R. 2086. In order to give applicants sufficient flexibility to accomplish the objectives set out in the Flex Plan, it may be necessary to waive certain statutory or regulatory requirements that would otherwise inhibit success. This provision recognizes that "one-size" public laws and regulations cannot be expected to fit all local needs and circumstances, and hence the need for exceptions by waiver.

I would like to make a few observations and suggestions related to this waiver provision.

First, the bill prohibits waivers that would *qualitatively* reduce the level of services or benefits to any individual or family that are eligible for benefits under one or more of the covered programs.

> **I would suggest that the language in Section 8 (b)(2) be revised to read as follows:** "The Flexibility Council may not waive a requirement...unless the Council finds that [waiver] shall not result in a ***net*** qualitative reduction in services or benefits for any individual or family, ***within available federal funding levels***, that is eligible for benefits...."

I propose this change because the major thrust of H.R. 2086 is its focus on achieving desired ***outcomes***. In some circumstances, recipients of program benefits may prefer and be better off if the Flex Plan includes certain ***"trade-offs"*** that may reduce some benefit levels in favor of raising other types of benefits. This could involve, for example, a reduction in housing assistance in favor of increased health or child-care benefits.

In this example, the level of specific benefits may be altered, but the net level of qualitative benefits would remain the same.

Given that the bill prohibits any increases of funding other than what would otherwise be available, it might be necessary to alter the "mix" of the money available to achieve the most beneficial outcomes.

The addition of the language, "*...within available federal funding levels...*" is intended only to clarify that net qualitative benefit levels are to be measured within the context of actual Congressional appropriations.

Finally, the bill prohibits waivers of Federal matching requirements. I would like to suggest that there may be instances when a waiver of matching requirements may be appropriate, either in whole or part, for communities experiencing financial distress, or for very small communities that have very limited fiscal capacities. The situation in Washington, DC is instructive in this regard, related to the City's problems in matching transportation funding.

For these types of communities, their ability to make use of federal assistance may depend on a lower matching ratio or, in some cases, no matching requirements.

> **To be truly flexible, the bill should recognize the special fiscal circumstances of distressed or small communities** (perhaps within some population parameters), **and allow for *negotiated* matching ratios if justified by fiscal considerations, and the objectives being sought.**

Community Advisory Committees

Most federal programs require that an applicant for assistance establish some type of special advisory body for review and comment on the program design, operation, and accomplishments.

Such requirements are intended to ensure adequate public participation and input. For larger governments, such requirements are not a significant problem. They already have and regularly sue many such mechanisms. If anything, the issue for them will be avoiding redundancy.

But, for smaller communities, the added cost can be significant given the probable size of the assistance and the program objectives being sought. The point that I would like to make here is that **applicants should be given the *option* of using existing citizen participation mechanisms** that are in place, provided that they are reasonably representative of the stakeholders targeted by the Flex Plan. This is likely to be the case if the government or organization is already administering an existing federal program.

Reports

I would like to conclude by commenting briefly on Section 12 of the legislation.

This section requires GAO to conduct a study of the law's implementation, and report to the Congress within 54 months of the date of enactment. The study is to look at the extent of local government use of the law, the effectiveness of federal programs as part of the flexibility process, and to provide recommendations with respect to local flexibility.

GAO is an experienced and quality research agency. But this agency does not have state and local government officials serving in its leadership to guide the study, and to decide what recommendations most effectively express their view of the law's merits and shortcomings.

I would like to suggest, Mr. Chairman, that **this type of evaluation should really be an intergovernmental endeavor** with involvement by federal, state, and local government representatives. **As such, I believe that an organization like ACIR may better serve this purpose.**

Finally, I would also like to suggest that **the report of this experience be presented to the *President* as well as the Congress.** Again, this process involves and impacts all branches and levels of government.

I appreciate the opportunity to make these comments on H.R. 2086, and will be happy to answer any questions that you may have.

THE WHITE HOUSE

WASHINGTON

Memorandum

Date: April 3, 1995

To: Empowerment Group

From: Paul Weistein

Subject: Waiver requests by agency

Here are the various waiver requests for the Empowerment Zones and Entrprise Communitites that we have received. We are passing them on to you as previously requested.

Sheryll Cashin

U. S. Department of Housing and Urban Development
Washington, D.C. 20410-7000

To Paul Weinstein

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

URBAN EMPOWERMENT ZONES /
ENTERPRISE COMMUNITIES TASK FORCE

Gaynor McCown

Memorandum

Info requested for the leg. flex working group. (Still waiting on info from USDA) Let me know what further info might be needed
—SDC

Date: March 27, 1995

To: Roy Priest, Director
EZ EC Task Force

From: Vicki Hendershot
EZ EC Task Force

Re: Waivers that have Legislative or Statutory in nature

Attached is a summary of the waivers requested by communities who applied for the Empowerment Zones / Enterprise Communities Title XX SSBG funds. These are requests which appear to involve legislative or statutory issues.

I have also included a copy of each communities request listed by agency. There are approximately 700 requests. The Task Force has received responses for some, but not all, of these requests.

Sheryll:
This is the waiver information that you requested in consideration of material for the Hayes amendment. I will see you tomorrow.

Roy
708-2290

WAIVER REQUEST SUMMARY BY AGENCY

3/27/95

DEPARTMENT OF LABOR

The majority of requests were for the Job Training Partnership Act and Davis Bacon Act. Of the approximately 176 waiver requests sent by communities, 115 were legislative or statutory in nature.

Most requests indicate that the program is too restrictive in its requirements and its funding. Communities feel that eligibility requirements need to be less restrictive so that more people (no just in the EZ/EC) can qualify for JTPA services. Numerous requests involve the Davis Bacon Act.

JTPA -

Eligibility criteria on various programs such as performance standards, direct job placement, job search, displaced worker criteria, income criteria, time limits on placement periods & eligibility, various program requirements, certification requirements. Communities: St Petersburg; Chicago; New Bedford; Winston-Salem; Elizabeth NJ; New York; Dayton; Akron; Philadelphia; Columbia; Oakland; LA; Denver; Dade Co; Chicago; Louisville; Shreveport; Baltimore; St Louis; New York

Program specific: Title IIA: Columbia; Louisville;

Title IIB time period: LA

Title IIC participation, 14-15 yr olds: New Haven; Louisville; Knoxville; Dade/Miami;

Title I custom training: New Haven

EDWAA: Akron

OJT: LA

New Directions program: New Bedford

21st Century Program: Kansas City

More flexible program requirements, such as summer youth funds use time limitations; age limitations. Communities: LA; Fall River; Chelsea; New York

procurement rules & cost categories. Communities: Salinas CA; New York; Baltimore;

funding mechanism, allow direct funding to community. Communities: Avondale/Maricopa County; Cook Co; Chelsea;

paperwork requirements, streamline. Community: LA;

enrollment documentation issues: Salinas CA;

use of funds for economic development: LA; Sacramento;

administrative fees: Chelsea

Sec 204(c)(2): Philadelphia

DAVIS BACON

increase coverage threshold, funding: Bell/Bell Gardens; San Francisco; Philadelphia; Chattanooga; Sacramento; Brownsville; Chicago; Louisville

compliance: Athens/Clark Co; Albany GA; Des Moines; Newark

increase threshold, additional work opportunities; San Francisco

increase volunteer participation: Sacramento

include cost of living adjustment: Philadelphia

certification frequency, Copeland Act: Louisville

documentation: Atlanta

WAIVER REQUEST SUMMARY BY AGENCY

3/27/95

DEPARTMENT OF LABOR contd.

APPRENTICESHIP PROGRAMS
Program procedures: LA

TARGETED JOBS TAX CREDIT
provide credit bonus for employers hiring EZ/EC residents: Tucson

WAIVER REQUEST SUMMARY BY AGENCY

3/27/95

DEPARTMENT OF HEALTH AND HUMAN SERVICES

The majority of requests were for AFDC, SSBG-Title XX, Medicare & Medicaid. Of the approximately 245 waivers requested by communities, 134 appear to be legislative or statutory in nature.

The waivers requested were for various program aspects, the majority of which targeted the Aid for Dependent Children. Medicare/Medicaid requests were for extensions of the length of coverage and extension of benefits to ineligible people. The requests are for people transitioning from welfare into jobs, education programs or jobs training programs with extended needs for temporary financial assistance, child care, health, and food benefits. More flexibility is requested to encourage employment and a successful transition.

A section 1115 waiver can be used for many of these requests.

AFDC: Winston/Salem; Columbus; Beaver Falls; Atlanta; Louisville; Baltimore; St Louis; Newark; Norfolk; Cleveland; Richmond;
Medicaid: San Francisco; Flint; Muskegon; Winston-Salem; New York; Yonkers; Akron; Columbia; Oklahoma City; Burlington; Oakland
Income support services: New York
Food stamps: Winston-Salem; Richmond
match requirements: LA; Atlanta; Benton Harbor
increase discretionary funding: LA
Ryan White regs Title I & II: Newark; Oklahoma City;
Lead screening: New York
patient confidentiality: Santa Ana; Greensboro;
paperwork consolidation: Greensboro;
flexibility of drug use funds: Santa Ana
45CFR233.10(a)(3)(i) & (iii): LA
45CFR402(a): LA
45CFR233.90(b)(2): LA
unemployment benefits: Chicago
universal case management: Chicago
Child Care Development Block Grant: Chicago; LA; Philadelphia;
Head Start: Chicago; Columbia
income eligibility & asset thresholds: Chicago; Indianapolis; Fall River; Yonkers; Greensboro;
FDA: Cambridge;
Line item transfers: Chicago
Elderly: Greensboro
JOBS: Baltimore; Philadelphia; Chicago
MHMR: Richmond;

WAIVER REQUEST SUMMARY BY AGENCY

3/27/95

DEPARTMENT OF TRANSPORTATION

The majority of requests were regarding transit projects. Of the approximately 19 requests, 8 appear to be legislative in nature.

ISTEA -green line match: Chicago
School bus regs: Avondale
formula grant apportionments: Bridgeport
construction cost local match: Dade Co/Miami;
Surplus Property Act: Philadelphia;

SMALL BUSINESS ADMINISTRATION

The majority of requests were regarding loan issues. Of the approximately 49 requests, 235 appear to be legislative or statutory in nature.

bonding & insurance mechanisms: San Francisco
unregulated lenders: San Francisco
small business definition: Chicago
lift caps on microloan programs: Chicago
microlender program: St Louis
7(a) underwriting, loan insurance authority: Chicago
504 program: Chicago, Bridgeport

DEPARTMENT OF EDUCATION

Of the approximately 43 requests, 113 appear to be legislative or statutory in nature.

Pell grants: Chicago
Student Loans of Doctors/Nurses: Newark

ENVIRONMENTAL PROTECTION AGENCY

The majority of requests involved site clean up and expediting the permit process. Of the approximately 58 requests, 18 appear to be legislative or statutory in nature.

Permit process or regulations: LA; Athens;
Environmental Liens: Chicago
Site Remediation, expedite approval process: LA;
dredge soil modify cost sharing formula: Dade Co/Miami;
Clean up costs: St. Louis; Cook County; New York;
Superfund: New Orleans
Clearance issues: Bell/Bell Gardens; Santa Ana;
NEPA: LA;
Clean Air Act: LA

WAIVER REQUEST SUMMARY BY AGENCY

3/27/95

GENERAL SERVICES ADMINISTRATION

All 4 requests appear to be legislative or statutory in nature.

Public law 101-136 Sec 15, purchase of govt building: Asheville
Prime contracts/contractors: East St. Louis

OFFICE OF MANAGEMENT AND BUDGET

All 4 request appear to be legislative or statutory in nature.

Circular A-133 Single Audit Act, ability to combine audits: Chicago; Louisville;
24CFR85: Sacramento

TREASURY DEPARTMENT

The majority of requests were for various types of tax credits. Of the approximately 28 requests, 21 appear to be legislative or statutory in nature.

Tax credits: Bell/Bell Gardens; Chicago: Lubbock; New Orleans; Newark; New York;
Charitable donation increase: Cook County
Tax exempt housing bonds: San Diego
Section 144(A)(4) expenditure cap: Fresno;
Historic tax credit: Bridgeport;
Commercial Industrial Dev. or Revenue Bonds: Santa Ana; Seattle
retroactive benefits: Chicago
Sections of IRS code: Akron; Burlington;

US DEPARTMENT OF AGRICULTURE

The majority of requests were for Food Stamp waivers and Student Nutrition. Of the approximately 14 requests, 13 appear to be legislative or statutory in nature.

food stamp program, Child Nutrition Services: Oakland; San Francisco; Chicago; Spartansburg;
paperwork reduction: San Francisco
meals at non school sites: Trenton
section 502 loans: Avondale/Maricopa Co; Shreveport
surplus food: New York

DEPARTMENT OF JUSTICE

We have not received any responses to the requests.

HUD WAIVER REQUESTS WITH RESPONSES

There are approximately 300 HUD waivers for which we have received responses. Based on this review, and an earlier analysis of waivers conducted in October, the trends in HUD waiver requests have remained consistent, and probably apply equally to those where responses have not yet been received. Where disposition is shown as both statutory and waivable, the responses differed depending upon the circumstances, or the amount of information provided in the waiver request.

TYPE/REQUESTORS	**DISPOSITION**
CDBG	
job creation requirements(San Francisco, Chicago-2, Hagerstown, Omaha, Roanoke, San Diego, Huntington)	both statutory and waivable
public service cap(Sacramento-2, San Francisco, 2, Athens/ Clarke Co., Albany, GA, Chicago -2, Louisville, Knoxville)	statutory
national objectives(Los Angeles -2, San Francisco, Hagerstown, Beaver Falls)	waivable
new construction eligibility(Omaha, Peoria, Newark, Tacoma)	both statutory and waivable
admin. cap(Dayton, Sioux City)	both statutory and waivable
1 for 1 replacement housing(New Haven, South Bend, LA)	waivable
Section 108 low/mod requirements(Hagerstown, St. Louis, Beaver Falls, Huntington)	waivable
economic devel. benefits(Lansing)	statutory
necessary and appropriate(Birmingham)	statutory

TYPE/REQUESTORS	DISPOSITION
reporting requirements(Birmingham-2)	statutory
CDBG	
allow float loans(LA)	statutory
eligibility(Dayton)	statutory
designate city as Entitlement(Paducah, Chelsea)	statutory
HOME	
match(LA-2, Peoria, Detroit, St. Louis)	waivable
uses(San Francisco-2), Seattle, San Diego, LA, Chicago)	waivable
restrictions(Omaha, LA, Peoria)	waivable
affordability(LA, Louisville)	waivable
CHODO admin.(LA, Louisville)	statutory
HOPE 3	
public ownership(Hagerstown)	statutory
requirements(S. Bronx, Huntington, Peoria)	both statutory and waivable
ENVIRONMENT	
CDBG requirements(Birmingham, Newark)	statutory

TYPE/REQUESTORS	DISPOSITION
Clean Air Act(LA)	statutory
historic preservation	statutory
pilot environmental liens(Chicago)	statutory
McKinney Programs	
change nature(San Francisco-2, LA)	statutory (legislation proposed)
HOPWA eligibility(Columbia)	
HOUSING/FHA	
appraisals(Chicago-2)	waivable
mortgage affordability(	waivable
mortgage loan to value(Chicago)	statutory
waive 203k mortgage caps(NY)	statutory
waive Nehemiah regs(Philadelphia)	waivable
Section 811 Program affordability(Chicago, Louisville)	both statutory and waivable
PUBLIC HOUSING	
convert to resident ownership/mgmt.(Buffalo)	statutory
rental income limits(Raleigh, Greensboro, Elizabeth, Newark, Houston)	statutory
income provisions(San Francisco, Albany, GA, Chattanooga,	

Tacoma)	statutory
TYPE/REQUESTORS	**DISPOSITION**
use modernization $ for development(	statutory
Section 8 requirements(San Diego-5, Tacoma)	waivable
OTHERS	
LBPA -waive rules(Burlington)	statutory
subsidy layering review(LA)	statutory
HOPE VI(Seattle-6) rental cap, income requirements, rent subsidies	not clear in responses if all are statutory
expedite Federal application processes	waivable
Coordinate HOME and CDBG better(Louisville)	

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: AVONDALE/MARICOPA COUNTY
Waiver JTPA
Description: U.S. Department of Labor should waive the requirement that JTPA funding must first go through the State and then through the County before JTPA funding for services is available to the community. This waiver should allow direct funding from the State to the Consortium cities or town. This will allow for local planning and implementation of job training programs taht addresses the identified needs of commercial and industrial job markets within the Consortium regional areas.

Agency: DOL Community: BELL/BELL GARDENS/CUDAHY/HUNTINGTON PK ET AL
Waiver - Davis-Bacon
Description: Appendix IV - Request increase in the triggering level for Davis-Bacon to $250,000 instead of $2,000.

Agency: DOL Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: JTPA -Streamline Paperwork
Description: Streamline the paperwork requirements.

Agency: DOL Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
Waiver - Flexible requirements
Description: Make eligibility requirements for youth program more flexible

Agency: DOL Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver Davis-Bacon
Description: Increase the Davis-Bacon Threshold - page III-14 (A)

Agency: DOL Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver Davis-Bacon
Description: Increase threshold for Davis-Bacon compliance to provide additional work opportunities for training programs - page III-20 (A)

Agency: DOL Community: SALINAS
Waiver: JTPA Amt. of Docu. to enrol
Description: Waiver of current amount of documentation requied to enroll persons in JTPA programs.

Agency: DOL Community: SALINAS
Waiver: JTPA Homeless Perm. Address
Description: Waiver of requirement for homeless prsons to have permanent address.

Agency: DOL Community: SALINAS
Waiver JTPA Proc. rules btw/HUD/DOL
Description: Waiver of inconsistent procurement rules between HUD and DOL

Agency: DOL Community: SACRAMENTO
WAIVER: 24 CFR570.603(a)
Description: Increase the Davis Bacon threshold to allow more volunteer participation.

Agency: DOL Community: SAN FRANCISCO(BAYVIEW,HUNTERSPOINT,SE)
Waiver Davis-Bacon
Description: page III-21 (A) increase threshold for Davis-Bacon compliance to provide additional work opportunities for training programs

Agency and Waiver Request:

Agency: DOL Community: NEW HAVEN/HAMDEN
Waiver JTPA Title IIC participation
Description: The City requests a waiver to allow in and out of school youth between the ages of 14-21 inclusive to participate in allowable activites under Title IIC.

Both the PIC and the local Board of Education strongly believe in an early intervention strategy, particularly for in school youth. Pre-employment actiivites for younger members of the youth population alone are inconsistent with early internvention, and we would like the flexibility to place 14-15 year olds, where it is appropriate, into limited internships and summer internships in the private sector.

Agency: DOL Community: NEW HAVEN/HAMDEN
Waiver JTPA Title I Custom training
Description: The City requests a waiver to exempt customized training activities from the federal procurement process, and permit the New Haven Sevice Delivery Area to develop a local policy on procuring customized training.

The PIC has identified customized training as a priority activity in an effort to be more responsive to the employer community. Employers have been reluctant to engage in customized training because of the lengthy procurement that is involved. The PIC wants to make sure the process is more attractive for employers to use.

In its role as a Regional Workforce Development Board, the PIC has identified customized training a a priority activity in an effort to be moreresponsive to the employer community. Employers have been reluctant to engage in customized training because of the legthy procurements that is involved. The PIC wants to make sure that the process is more attractive for employers to use.

Agency: DOL Community: ST. PETERSBURG
Waiver JTPA
Description: Page 95 - Currently, the PPIC may not use JTPA funds to cover the cost of training individuals that do not meet the federal "multiple barriers" test. This is to request that the above eligibility criteria be waived to order for those who would otherwise be eligible for JTPA funding to participate in the Achievement Center's employment training opportunities.

Agency: DOL Community: ATHENS/CLARKE COUNTY
Waiver-CDBG Program
Description: A WAIVER HAS BEEN REQUESTED OF DAVIS -BACON LAW TO FEDERAL PROGRAMS INCLUDING CDBG PROGRAM AT HUD. THE USE OF SMALL AND MINORITY BUSINESSES AND CONTRACTORS IS A PRIORITY FOR MANY FEDERAL PROGRAMS. HOWEVER, EXPERIENCE HAS SHOWN THAT THE LABOR STANDARDS INCLUDED UNDER THE DAVIS BACON REGULATIONS WHICH OFTEN APPLY TO FEDERALLY FUNDED PROJECTS AND PROGRAMS(i.e., CDBG FUNDS, OFTEN PRESENT A BARRIER TO THE PARTICIPATION OF SMALL AND MINORITY BUSINESSES. THESE BUSINESSES OFTEN DO NOT HAVE THE CAPACITY TO COMPLY WITH THE REPORTING AND ACCOUNTING REQUIREMENTS OF THIS LEGISLATION. SEE SECTION 5-10 OF THE APPLICATION BINDER 2 OF 2.
THE WAIVER REQUEST IS: A WAIVER TO PROVIDE FLEXIBILITY WITH THE APPLICATION OF DAVIS -BACON REGULATORY REQUIREMENTS.

Agency: DOL Community: ALBANY, GA
Waiver -- Davis/Bacon Act
Description: Statutory issue requesting waiver of the Davis Bacon Act's requirements. No further discussion of the waiver. Page 115.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: DES MOINES
Waiver Davis Bacon
Description: Waive Davis -Bacon requirements for the City of Des Moines business loan programs for construction projects located in the enterprise community in which a loan of $50,000 or less is involved.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver: training providers
Description: Ease rules requiring all providers of training-related programs to compile information from program participants regarding their income eligibility for the program.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver: unemployment benefits
Description: Seek a waiver extending the period for dislocated persons receiving unemployment benefits to qualify for job training and placement resources where the necessary (re)training extends beyond the allowable 2-year period. This is often needed for persons displaced from manufacturing jobs.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver Davis Bacon
Description: page 57. Modify Davis Bacon requiremtns to permit training wage to allow pre-apprenticeship programs to qualify as Bureau of Labor apprenticeship programs. Current requirements mandate payment of prevailing wages to trainees, thus increasing project costs. A third tier of wage rates shoudl be permitted on demonstration basis within EZ/ECs. This third tier would be tied to 75% of the prevailing wage per occupation category and training level.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver 5 Labor HUD Federal training
Description: Page 5, item 20. Allow EZEC residents to self certify their eligibility for federal job training.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver 4 Labor CDBG
Description: Page 59. Waiver allowing EZEC resident to joint eligibility requirements and enrollment procedures for complementary federal programs such as JOBS, JTPA, and CDBG.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver 1 JTPA
Description: Page 59, item 22. Allow the use of JTPA funds to upgrade the skills of entry level people who are placed as a result of EZEC related programs as part of a career development plan and qualifying for advanced placement.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver 3 extend JTPA support
Description: Page 59, item 24. Extend JTPA support beyond the 90 day placement period to up to three years in activities leading to full certification, college degrees or licenses.

Agency: DOL Community: CHICAGO (WESTSIDE)
Waiver JTPA, etc.
Description: Promote the "single intake method" of providing services that would offer ease of access to residents of a broad range of services. This would also reduce many agencies' cost for intake, screening, and administration, which would in turn allow them to redirect funds to direct service. Specicific examples of eligibility barriers that could be overcome by a single intake, or family one-stop, center include: prequalification and a single set of paperwork for the various JTPA-funded programs offered; and consolidation of paperwork requirementsfor all services that would be provided under the same roof.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: COOK COUNTY
WAIVER JTPA Placement Tests
Description: Waive the JTPA time limit on the use of placement tests so that school-administered tests can be used for students participating in their high schools Partnership Academy.

Agency: DOL Community: COOK COUNTY
WAIVER JTPA CONTRACTS
Description: Amend JTPA to allow awarding contacts over a two year period and on short term competitive negotiations for unanicipated needs.

Agency: DOL Community: COOK COUNTY
WAIVER JTPA funding categories
Description: Amend the JTPA to remove rigid categories for funding and to allow funds to be allocated as needed, similar to the CDBG program.

Agency: DOL Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver tax revenues
Description: Divert City head tax revenues from general funds to specific needs in the area, such as job training through the Job Training Discretionary Fund.

Agency: DOL Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver increase JTPA
Description: Increase the current level of JTPA funding.

Agency: DOL Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver dislocated workers
Description: Extend dislocated worker funding from two years to five years.

Agency: DOL Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver 90 day placement
Description: Extent JTPA support beyond 90-day placement period.

Agency: DOL Community: FALL RIVER
Waiver request - JTPA
Description: Page 15 of EC Narrative: Waiver of JTPA regulations regarding eligibility. Would authorize JTPA funds to be utilized more flexibly in public schools for youth programs, career development, drop-out prevention and school to work transition programs.

Agency: DOL Community: FALL RIVER
waiver
Description: Waiver to allow employers greater flexibility to upgrade and retrain existing workers.

Agency: DOL Community: CHELSEA
Waiver
Description: Provide greater flexibility in eligibility requirements for assistance and training. Refer to page 42.

Agency: DOL Community: CHELSEA
Waiver
Description: Allow local agencies a 10% administrative fee to implement their programs. Refer to page 42.

Agency: DOL Community: CHELSEA
Waiver
Description: Adopt a 3 year funding schedule. Refer to page 42.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: CAMBRIDGE
Waiver JTPA 20 hour minimum
Description: WAIVER: (1) JTPA REQUIREMENTS FOR 20 HOUR MINIMUM WEEKLY CLASS ATTENDANCE FOR ADULT BASIC EDUCATIONS STUDENTS

Agency: DOL Community: NEW BEDFORD
WAIVER JTPA age restrictions
Description: Waiver of JTPA age restrictions so activities may be available for entire schools in the highest poverty regions of the EC.

Agency: DOL Community: NEW BEDFORD
WAIVER JTPA New Directions
Description: WAIVER - of income restrictions to be consistant with the higher of JTPA (New Directions) and CDBG, to allow for coordination between the two activities.

Agency: DOL Community: WINSTON-SALEM
Waiver JTPA
Description: Current JTPA criteria disqualifies many under-employed, part-time workers, singles & small families from qualifying for training programs: expand clients served by JTPA not meeeting economically disadvantaged criteria from 10% to 25%.

Agency: DOL Community: fELIZABETH
Waiver Request
Description: The City asks that JTPA be allowed to waive eligibility requirements for participants on a discretionary basis, to allow the maximum number of target area residents to take advantage of JTPA training and placement programs.

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-JTPA
Description: Waive JTPA prohibition on job search.

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-JTPA
Description: Waive JTPA prohibition on direct job placement

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-JTPA
Description: Waiver on JTPA prohibition on performance standards

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-JTPA
Description: Create critically needed summer jobs for neighborhood youth by waiving income limits

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-SYEP
Description: Waive SYEP program restrictions to create part time jobs

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Youth fair chance
Description: Waive income limitations

Agency: DOL Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Day care vouchers
Description: Waiver allowing parents who are attending four year college programs (as well as working parents and those attending two year programs) to receive day care and after school vouchers

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: NEW YORK CITY/QUEENS(JAMAICA)
Waiver SYEPT
Description: SYEPT funds available year round.

Agency: DOL Community: NEW YORK CITY/QUEENS(JAMAICA)
Waiver Cleanup regs
Description: Waiver of regs linking cleanup to determination of legal responsibility and share.

Agency: DOL Community: NEW YORK CITY/QUEENS(JAMAICA)
Waiver-OJT youth wages
Description: OJT youth wages procurement and cost categories.

Agency: DOL Community: NEW YORK CITY/QUEENS(JAMAICA)
Waiver - Title II-B
Description: Year round use of II-B.

Agency: DOL Community: DAYTON
Waiver-Increase of JTPA spec. rule
Description: The next request is for an increase of the JTPA current special rule that requires that not less than 10% of participants are not economic disadvantaged (The plan asks for a 20% standard) pg. 47

Agency: DOL Community: AKRON
Waiver JTPA waivers
Description: 1A. JTPA Related Waivers. PIC shall be permitted to accept any unemployed or underemployed EC resident as eligible for JTPA services. All other eligibility criteria shall be waived.
B. Allow PIC to place EC clients in private sector work experience. Allow Summer Youth Program participants from the EC to participate in private sector work experience. DOL rule waiver of definition changes are needed. Revise Interim Final Rule 1992 JTPA Amendment 627.245 Work Experience to allow for prkivate sector work.
c. Allow JTPA funds to be used for a stand alone EC job cluf for placement of job ready clients. OBES shall support this EC extra service expansion.
d. The JOBS program shall be permitted to use private funds as local match requirements for EC clients.
e. Simplify PIC On-the-Job Training (OJT) contract documentation for EC residents or businesses. DOL program requirement waivers needed. OJT provides up to 50% wage supplements during initial 26 weeks of employment when needed for training or on-the-job experiences.
2. Waivers of Federal food stamp regulations to permit General Assistance clients receiving substance abuse or mental health counseling to receive job training instruction.
3. Regulations for the Job Opportunitites and Basic Skills (JOBS) Program that deal with private source of match. Regulations 45 CFR 250.73(d) put requirement on private sources of matching funds. Ohio would recommend changing federal regulations to make the requirements for private and public match virtually the same (See pgs. 232-233).

Agency: DOL Community: AKRON
Waiver EDWAA funds
Description: Allow EDWAA funds to be used for any laid off EC client. Economic Dislocation and Worker Adjustment Act.

Agency: DOL Community: AKRON
Waiver EDWAA eligible clients
Description: Allow unemployed EC residents to wualify as EDWAA eligible and for EDWAA services under 301(a)(1)(c) and 301 (a)(1)(d).

Agency and Waiver Request:

Agency: DOL Community: PHILADELPHIA(GERMANTOWN,HUNTINGTON PARK)
Waiver-Davis-Bacon Act
Description: Amend the Davis-Bacon Act. Include a cost of living adjustment to raise government expenditure threshold at which the act kicks in.

Agency: DOL Community: PHILADELPHIA(GERMANTOWN,HUNTINGTON PARK)
Waiver-JTPA
Description: Modify JTPA legislation to provide Federal funds for direct Job Placement. Page 47

Agency: DOL Community: PHILADELPHIA (NORTH CENTRAL)
WAIVER JTPA econ. regs for admissin
Description: North Central Philadelphia's EC application requests a waiver of the following JTPA regulations for the first 5 years of the EC economic development plan: economic regulations for admission.
(Sec IX-46)

Agency: DOL Community: PHILADELPHIA (NORTH CENTRAL)
WAIVER: Davis-Bacon Regulations
Description: North Central Philadelphia's EC application requests a waiver of Davis-Bacon regulations to permit payment of wages in keeping with an employer's economic capacity, as opposed to paying the higher prevailing wages. (Sec.IX-46)

Agency: DOL Community: PHILADELPHIA (NORTH CENTRAL)
Waiver JTPA time in program
Description: North Central Philadelphia's EC application requests a waiver of the following JTPA regs for the first 5 years of the EC economic development plan: Waive regs. on length of time in program (See IX-46)

Agency: DOL Community: PHILADELPHIA (NORTH CENTRAL)
Waiver JTPA employmnt stds.
Description: North Central Philadelphia's EC application requests a waiver of the following JTPA regs for the first 5 years of the EC economic development plan: Waive regs. on barriers to employment standards for admission.

Agency: DOL Community: PHILADELPHIA (NORTH CENTRAL)
Waiver JTPA amt spent on trg
Description: North Central Philadelphia's EC application requests a waiver of the following JTPA regs for the first 5 years of the EC economic development plan: amount spent on training, See IX-46.

Agency: DOL Community: COLUMBIA
Waiver JT Title IIA wages
Description: See page 71 of application
Elimination of youth on the job training wage rates based on adult JTPA Title II-A wage rates.

Agency: DOL Community: COLUMBIA
Waiver JTPA Title IIC
Description: see page 72 of application.
Eliminate rule under Title II-C requiring one out of school youth in program for every in school youth enrolled

Agency: DOL Community: CHATTANOOGA
Waiver Davis Bacon
Description: Waiver to raise the Davis-Bacon limits to 200,000

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: BROWNSVILLE
Waiver - Davis Bacon Wage Rates
Description: Request Federal Davis-Bacon wage rate be waived to increase contractor participation in building rehab. See page 62 of plan.

Agency: DOL Community: TUCSON/SOUTH TUCSON/PIMA COUNTY
Waiver Targeted Jobs Tax Credit
Description: Waiver request page 9.6 of application.
Provide employers with a targeted jobs tax credit bonus for hiring EZ/EC residents.

Agency: DOL Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 JTPA
Description: Current regulations restrict EZ qualified employees to people enrolled or recent graduates of JTPA-funded program. This pool excludes residents who are JTPA eligible. As JTPA eligibility is based on several economic and demographic factors that define the people we hope to target, this restriction should be waived at the state level (legislation may be pending) to expand the EZ hiring-credit labor pool.

Agency: DOL Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver guarantee eligibility
Description: Medi-Cal waiver that will remove economic disincentives to taking low paying jobs with no health insurance: guarantee eligibility for 6 months, even if changes in family income or structure occur during that time.

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver - Apprenticeship program
Description: Waiver of apprenticeship program approval by the DOL/Bureau of Apprenticeships and Traning and the State of California Division of Apprenticeship Standards (DAS).

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver Title II-B
Description: Waiver on use of Title II-B Summer Youth Employment and Training funds to allow for such programs to operate thoughout year.

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver - Prohibition of JTPA
Description: Waiver of prohibition of JTPA funds for economic development

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: youth wages
Description: Waiver for youth wages "on the job training" wage requirments

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver 1 JTPA after school trg
Description: Waive to extend program to include an after school training program to continue after the vacation program

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver JTPA military certification
Description: Waive military certifications

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver JTPA econ dev funds
Description: Waive portion of JTPA funds to be used for economic development.

Agency and Waiver Request:

Agency: DOL Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver JTPA elig requirements
Description: Waiver JTPA eligibility requirements

Agency: DOL Community: FRESNO CITY AND COUNTY
Waiver - Davis Bacon Act
Description:

page 80

Housing Safety and Weather Pr4otection Program - Davis Bacon Act - Eliminate nexus to number of units. Increase project basis to those over $200,000.

page 83

Agency: DOL Community: SACRAMENTO CITY & COUNTY
Waiver: job Training
Description: Eliminate job training programs from the public service cap and re-categorize them as economic development
24 CFR 570.201(e)

Agency: DOL Community: SACRAMENTO CITY & COUNTY
Waiver: Davis Beacon
Description: Increased the Davis Beacon threshold to allow more volunteer participation
24 CFR 570.603(a)

Agency: DOL Community: SACRAMENTO CITY & COUNTY
Waiver: JTPA
Description: Waiver service to youth in JTPA - streamline definitions of age categorties between funding sources so more services can be accessed by the client.

Agency: DOL Community: DENVER CITY AND COUNTY
Waiver-JTPA
Description: Change eligibility requirements of JTPA to age & traget area residency & this would serve customers more efficiency--an easy way to make the change is to alter staatutory requirement to "serve economically disadvantaged" residents to a definition to include residents of EZ/EC

Agency: DOL Community: BRIDGEPORT
Waiver - Davis Bacon
Description: Waiver - Observing union work rules for community development projects. See pages CD 7-8.

Agency: DOL Community: DADE COUNTY/MIAMI/HOMESTEAD/FLORIDA CITY
Waiver:JPTA 2c Reg Schl Requir Flex
Description: REQUEST: Permit flexibility for JPTA 2c regulations so 50% of recipients of JPTA funding do not have to be out of school. Allow local discretion to, e.g., determine ratio of at-risk to drop-outs, based on programmatic needs. [CITE: Section 263 (c) of Job Training Partnership Act] STATUTORY ACTION REQUIRED

Agency: DOL Community: ATLANTA
Waiver - Davis Bacon
Description: City requests to simplify documentation under the Davis-Bacon wage-identification program and contractor/project monitoring; see page 6, Expanding employment Section and page 11 Executive summary;

Agency and Waiver Request:

Agency: DOL Community: CHICAGO
Waiver1 Davis Bacon wage requiremnt
Description: See page 57- Seek relief from Davis Bacon prevailing wage requirement for federally funded projects within the Zone. Zone residents are looking for help in creatimg skilled jobs opportunities for themselves, as well as to enable non-profit and smaller, often minority contractors to undertake more projects generating community benefits. One option is to raise the ceiling to allow smaller projects within the EZ/ECs to be exempt from Davis-Bacon requirements.

Agency: DOL Community: CHICAGO
Waiver5 Labor-HUD-Federal Training
Description: See page 5-item 20- Allow EZ/EC residents to self certify their eligil ity for federal job training

Agency: DOL Community: CHICAGO
Waiver4 Labor-CDBG
Description: See page 59 for jobs, JPTA, and CDBG waiver request-Item21-Seek federal waivers allowing EZ/EC residents to joint eligibility requirements and enrollments procedures for complementary federal programs such as JOBS, JPTA, and CDBG.

Agency: DOL Community: CHICAGO
Waiver1 Job Training Partnership A
Description: See page 59-Item 22-Seeks a federal waiver to allow the use of job training Partnership Act funds to upgrade the skills of entry level people who are placed as a result of EZ/EC-related programs as part of a career development plan and qualifying for advanced placement

Agency: DOL Community: CHICAGO
Waiver3 Extend JPTA support
Description: See page 59, Item 24-to extend JPTA support beyond the 90 day placement period to up to three years in activities leading to full certification, college degrees or licenses.

Agency: DOL Community: CHICAGO
Waiver JOBS-40% State match
Description: See page 60-item 26-so Chicago can access all of the $27 million that it would be entitled to- Seek a Congressional waiver of the 40% state match requirement under the Job Opportunities and Basic Skills(JOBS) program so that Chicago can access all or a portion of the $27 million that it would be otherwise entitled to.

Agency: DOL Community: LOUISVILLE/JEFFERSON COUNTY
Waiver Davis Bacon Prevailing Wage
Description: Currently the threshold limit for construction projects is $2000. A more reasonable threshold would be $100,000. pg 15-26.

Agency: DOL Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Labor Standards-24 CFR, 570
Description: Labor Standards-24 CFR, Part 570, Sec 603--The requirements are labor intensive and demanding for many minority contractors. The Act should be amended to allow a one-time certification by the builder, at the beginning and end of construction, stating that prevailing wage rates have been paid.

Agency: DOL Community: LOUISVILLE/JEFFERSON COUNTY
Waiver 1: Job Training Partnership
Description: Waive the Job Training Partnership Act limitations to allow the extention of time that participants may perform on-the-job training. pg 14-34

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOL Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Titles IIA & IIC
Description: Waive the 65% barrier requirement for Titles IIA and IIC if an individual is economically disadvantaged. pg 15-34

Agency: DOL Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-JTPA
Description: Allow JTPA resources to be used to provide basic skills and upgrade skills for people who are currently employed. pg 15-34

Agency: DOL Community: SHREVEPORT
WAIVER - JTPA
Description: WAIVER - Request Reg 628.803(h)(l)
(Page 122 EZ application).

Agency: DOL Community: BALTIMORE
Waiver JTPA youth age guiddlines
Description: JTPA In-School Youth Age Guidelines: 628.803(b)(1)(i) allow all high school youth regardless of age to be served in the EZ. Ref: Vol 3 Ch5-5

Agency: DOL Community: BALTIMORE
Waiver JTPA youth income guidelines
Description: In-and-Out-of-School Youth Income Guidelines -- 628.803(a)(2) & 628.803(b)(2)(i): waive the income guidelines for EZ youth so all youth from zone neighborhoods can be served, not just those "economically disadvantaged".
Ref: vol. 3, Ch. 5-5

Agency: DOL Community: BALTIMORE
Waiver JTPA procurement
Description: JTPA Procurement: 627.420(b) has very strict guidelines for goods and services. Waive regs to allow sole source procurement in the EZ if the deliverer is a community based group. Ref: Vol3 Chp5-5

Agency: DOL Community: BALTIMORE
Waiver JTPA OJT
Description: OJT: 627.240(b) is currently limited to 6 months, but some occupations require a longer period before a participant can be fully trained. Waive the 6 month limitation for EZ residents. Ref: Vol3 Chp5-5

Agency: DOL Community: BALTIMORE
Waiver JTPA Training funds
Description: Training Funds: 627.440(c)(d) specifies tracking/reporting req'ts. Waive reg to allow pooling of training funds from all sources for EZ efforts and allow a single system of tracking/reporting across all funding streams. Ref: Vol3, Chp5-6

Agency: DOL Community: BALTIMORE
Waiver JTPA Cost classification
Description:

Agency: DOL Community: BENTON HARBOR/BENTON TOWNSHIP
Waiver: PIC Family Income Limits
Description: Waive family income restrictions for PIC employment and job training programs for any resident of the Zone. See page 1 of Appendix G and pages 56-57 of Strategic Plan.

Agency and Waiver Request:

Agency: DOL Community: KANSAS CITY, MO/KANSAS CITY, KS
Waiver JTPA 21st Century Program
Description: Seeking wavier from the Job Training Partnership Act (JTPA)
The 21st Century Program - is a pilot which uses AFDC and food stamp benefits as wages to provide business incentive to employers and allows the employee to retain their medicaid and child support for a period of up to four years. Under this program an incentive for businesses in the zone is to have residents of the zone by supplementing employee wages during training.

Agency: DOL Community: ST LOUIS/WELLSTON/ST LOUIS CO
Waiver Job Training Partnership Act
Description: Page IX 31 - Waive income eligibility requirements for individuals in households that have aggregate incomes over the DoL poverty guideline, allowing less stringent access to JTPA services.

Agency: DOL Community: NEWARK/ELIZABETH
Waiver Davis Bacon act
Description: Pending passage of the Mavis Bacon act, Newark requests a waiver from the Act's provisions, on an experimental basis, in the EZ only. P 153

Agency: DOL Community: NEW YORK COUNTY/BRONX COUNTY
Waiver JTPA Job Prohibitions
Description: Waive JTPA prohibition on job search/placement, adjustments to performance standards.

Agency: DOL Community: NEW YORK COUNTY/BRONX COUNTY
Waiver JTPA Distrib. Requirements
Description: Waive JTPA requirements regarding distribution of funding according to incidence of eligibility in population to give some flexibility in creating EZ programs.

Agency: DOL Community: PHILADELPHIA PA/CAMDEN NJ
Waiver 4 - JTPA 20 CFR sec.627.2
Description: 45-day enrollment in Job Training. Provides that individuals seeking enrollment in a job training program must be enrolled within 45 days. This frequently results in participants being shunted into inappropriate training programs because a program consistent with the participant's goals, aptitudes and interests is not immediately available. By waiving the 45-day requirement, participants will be allowed to enroll in a training program with a better match to the goals, aptitudes and interests of the participant.

Agency: DOL Community: PHILADELPHIA PA/CAMDEN NJ
Waiver Bus. Owners who are labor
Description: Seeks waiver for business owners who perform as laborers and mechanics on a federally financed or assisted construction.

Agency: DOL Community: PHILADELPHIA PA/CAMDEN NJ
Waiver JTPA & EZ funds
Description: Waive The interwining of JTPA funds with EZ funds is needed to realize the job training strategies. Thus, this reg poses a barrier to support non-profit job training. Waiving this requirement or, in the alternative, encouraging advance payments to non-profit service providers, will strengthen Zone job training efforts.

Agency: DOL Community: KNOXVILLE
Waiver - JTPA
Description: JTPA currently prevents youth below the age of 14 from participating in job training programs. A waiver is requested to lower the minimum age to 11 to allow the benefits of school-to-work to accrue to those youngsters at the greatest economic risk. (p. 50)

DOL total: 115

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOT Community: AVONDALE/MARICOPA COUNTY
Waiver School bus regulations
Description: School buses are subject to an entirely different set of regulations when they are used for a purpose other than transporting children to and from school. These added regulations create a significant barrier for using buses for social service transportation. Other than this barrier, school buses are an inexpensive solution to much of the transportation need. The Federal Highway Administration, Office of Federal Motor Carrier Standards, should waive this restriction.

Agency: DOT Community: CHICAGO (WESTSIDE)
Waiver ISTEA Green line
Description: Page 58. Waive 20% local match requirement under ISTEA relating to the Green Lines in order to enable the Chicago Transit Authority to respond more flexibly to 4residents need, or to encourage transit-oriented development in the currently underserved, highly distressed areas represented by the EZ/EC.

Agency: DOT Community: BRIDGEPORT
Waiver: Section 9 Assistance
Description: Allow transfer of Federal Transit Administration Section 9 Formula Capital and Operating Assistance at some appropriate ratio to facilitate capital projects envisioned by Strategic Plan. See page PD-10.

Agency: DOT Community: DADE COUNTY/MIAMI/HOMESTEAD/FLORIDA CITY
Waiver:Cnstrct Cst Lcl Match Requir
Description: REQUEST: Waiver of local match requirement of at least 20% for construction costs. [CITE: Intermodal Surface Transportation Efficiency Act of 1991] STATUTORY ACTION REQUIRED

Agency: DOT Community: DADE COUNTY/MIAMI/HOMESTEAD/FLORIDA CITY
Waiver:Change Cost Effect. Measure
Description: REQUEST: Change the cost effectiveness measure for certain projects, e.g., the cost effective measure to qualify a transit project for Federal funding would disqualify the South Dade Rail Line. [CITE: Intermodal Surface Transportation Act of 1991] STATUTORY ACTION REQUIRED

Agency: DOT Community: CHICAGO
Waiver ISTEA-Green Line
Description: See page 58-Waive 20 % local match requirement under ISTEA relating to the Green Line in order to enable the Chicago Transit Authority to respond more flexibly to residents needs, or to encourage transit-oriented development in the currently underserved, highly distressed areas represented by the EZ?ECs.

Agency: DOT Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Final Plans
Description: Waiver of the requirement that final plans must be complete and approved prior to initiating the right of way phase, etc. pg 15-35

Agency: DOT Community: PHILADELPHIA PA/CAMDEN NJ
Waiver Surplus Property Act
Description: Waive The Surplus Property Act and its implementing regs, 45 CFR Sec. 12 et seq., outline procedures for the disposition of surplus governmental property. The intermodal facility may involve selling or leasing certain properties currently or previously owned by the government. Through the EZ, flexibility is sought to ensure rapid disposition of any surplus property to support the intermodial transit facility.

DOT total: 8

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: ED Community: CHICAGO (WESTSIDE)
Waiver Pell Grants
Description: Page 86 Vol II City wants to reinstate federal legislation making part-time students eligible for Pell Grants for Zones residents. Elimination of this allowance has tendency to hurt single parent students who must work.

Agency: ED Community: NEW YORK CITY/QUEENS(JAMAICA)
Waiver School to work high poverty
Description: Preference for training programs.

Agency: ED Community: TUCSON/SOUTH TUCSON/PIMA COUNTY
Waiver-Eligibility
Description: Waiver request see page 9.6 of application. Disregard savings for educational expenses for AFDC families in order to support EZ/EC residents in pursuing a higher education.

Agency: ED Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Project Reclaim
Description: Permit chapter 1 funds to be used to address safety issues; i.e. campus supervisors, fences, school-wide capital improvements, custodial and painting services to improve climate.

Agency: ED Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Chapter 1 Funds
Description: Permit use of Chapter 1 funds to address life-circurmstances issues before addressing educational needs; i.e. safety, self-esteem, personal growth, health, racial identity, inter-groups relations, multiculturalism.

Agency: ED Community: CHICAGO
Waiver Pell Grants
Description: Page 86-VolI- The City wants to reinstate federal legislation making part-time students eligible for Pell Grants for Zone residetns-Elimination of this allowance has tended to hurt single -parent students who must work.

Agency: ED Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Head Start and Even Start
Description: Allow for the blinding of Head Start and Even Start funds with local and state resources for early childhood education to create a universal program for 3- and 4-year old children. pg 15-35

Agency: ED Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Chapter 1
Description: Allow Chpater 1 funds to be blinded with local funding. pg 15-35

Agency: ED Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-TAP/CAPE
Description: Allow the blending of TAP/CAPE funds for secondary vocational education for teen-parent programs. pg 15-35.

Agency: ED Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-Goals 2000
Description: Waiver submitted by the KY Dept. of education to allow the requirements under the KY Educ. Reform Act to substitute for outcomes under the Goals 2000 plan for KY. pg 15-36

Agency: ED Community: NEWARK/ELIZABETH
Waiver 2 Student loans
Description: Forgive federal loans to doctors and nurses who relocate to the EZ.

ED total: 11

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: EPA Community: BELL/BELL GARDENS/CUDAHY/HUNTINGTON PK ET AL
Waiver - Compliance time tables
Description: Appendix IV - Want a pool of compliance credits to reduce total emissions to reflect closed businesses.

Agency: EPA Community: SANTA ANA
WAIVER Federal 8 step
Description: p. 484 Reform federal 8 step environmental clearance process for federally-funded capital projects occurring in a flood plane.

Agency: EPA Community: SANTA ANA
WAIVER clearances
Description: p. 486 Provide priority consideration of requests and environmental clearances necessary, with respect to infrastructure and transit projects in ec.

Agency: EPA Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: Clean Air Act
Description: Enterprise Community Designation must include a noncommitant conformity finding with the Clean Air Act

Agency: EPA Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: NEPA
Description: Designated EC's should have NEPA requirements waived where CEQA hs been complied with (Similar to NAFTA).

Agency: EPA Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: PERMITS
Description: Place time limitation on issuance of local, State and Federal permits.

Agency: EPA Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: HAZARDOUS MATERIALS
Description: Site remediation should be expidited to a 60 day review.

Agency: EPA Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
Waiver
Description: Identify single lead agency in multi-jurisdiction

Agency: EPA Community: ATHENS/CLARKE COUNTY
Waiver-Programs Subject to EPA LA
Description: Waiver request to simply the regs and make them more user friendly and less time consuming.

Agency: EPA Community: CHICAGO (WESTSIDE)
Waiver Environmental Liens EZ
Description: Page 61, item 36. Pilot use of environmental liens with EZECs. Local govts that clean up abandoned properties which they do not own have the ability of establish a lien on the property similar to a Superfund Lien, so any expenditures may be recovered.

Agency: EPA Community: COOK COUNTY
WAIVER ENVIRON. CLEAN-UP
Description:

Agency: EPA Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Site clean up
Description: Waiver requested for relief from expensive and unrealistic government regulations on site clean up

Agency and Waiver Request:

Agency: EPA Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: Site Remediation
Description: Environmental Site Remediation: Expedited Approval Process: expedited to a period of 60 days or less.

Agency: EPA Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: Contaminated Site
Description: Create comprehensive and expedited process to address the clean-up and developemtn of previously contaminated sites in EZEC areas. Effort would include expedited permitting process, an interagency team of federal, state and local agencies, representatives from industries such as banking, insurance, hazardous clean-up as wll as non-profit economic development community organizations.

Agency: EPA Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: Air Quality
Description: Waiver to amend SCAQMOD New Source Review Reg., either administratively or through policy board to establish a priority for those small businesses targeted for EZ/EC area.

Agency: EPA Community: DADE COUNTY/MIAMI/HOMESTEAD/FLORIDA CITY
Waiver: Dredge Spoil Dsposl Cost/Sh
Description: REQUEST: Modify existing [75% Fed-25% Non-Fed] cost-sharing formula to provide for greater share of cost in dredge spoil disposal to be payed by the US Corps of Engineers re: the Miami River Dredging Project. [CITE: Rivers and Harbors Act of 1930] STATUTORY ACTION REQUIRED

Agency: EPA Community: NEW ORLEANS
Waiver: Superfund
Description: Waiver to EIS requirements to set up Office in New Orleans. Ref. Vol. 2, Chpter. VIII, p. 7.

Agency: EPA Community: ST LOUIS/WELLSTON/ST LOUIS CO
Waiver Brownfield Clean-up Costs
Description: Relax some clean-up requirements on certain types of retail and commercial development, making more grants and tax credits available for owners of contaminated sites.

EPA total: 18

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: GSA Community: EAST ST LOUIS
Waivers Prime Contracts
Description: WAIVER #1: Proposals from firms located in EZ/EC should receive waivers for prime contracts with DOD or GSA should be given preferential treatment in the source selection process (pg. 153).

WAIVER #2: Any DOD and GSA prime contracts should be targeted to EZ/EC firms who can help meet federally mandated goals (pg. 153).

WAIVER #3: Proposals from prime contractors who use subcontractors located in EZ/EC should receive maximum preferential treatment by DOD and GSA for contract awards (pg. 153).

Agency: GSA Community: ASHEVILLE
Waiver - Govt facility purchase
Description: GSA needs to waive the requirement to allow a government entity to purchase a government facility for a nominal fee. This may require an amendment of PL 101-136, Sec 15.

GSA total: 2

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: PADUCAH
Waivers (2) - AFDC Food Stamps
Description: Waiver 1: Vehicle Value Limitation for selected AFDC Food Stamp Recipients associated with OFF<JOBS< Project Self-Sufficiency and special programs of HAWS: increase from $1,500 to $6,000.

Administering agencies are listed as follows:
- NC Dept. of Human Resources;
- NC Agriculture Dept.
- HUD/HAWS

Waiver 2: Transitional benefits for AFDC recipients for participants of OFF, JOBS, Project Self-Sufficiency & Special Housing Programs: increase benefits from 1 to 2 year period for child care/medicaid.

[Same administering agencies as #1]

Agency: HHS Community: SANTA ANA
WAIVER drug funds
Description: p. 486 - Add flexibility to federal restrictions on the use of drug funds (i.e., presently agencies may only contract with non-profit organizations.)

Agency: HHS Community: SANTA ANA
WAIVER patient confidentiality
Description: p. 486 - re-evaluate federal patient confidentiality rules which severely restrict the sharing of information about individual clients.

Agency: HHS Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver 2 - Wrap around services
Description: Wrap-around Services to Families: HCFA waiver to utilize Title XIX funds - page III-16 (A)

Agency: HHS Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver return federal dollars
Description: Waive the return of unspent Federal Dollars, P III-17 (A)

Agency: HHS Community: LOS ANGELES(EASTSIDE,PICO UNION,WESTLAKE)
Waiver AFDC
Description: Waive 45CFR 233.10(a)(3)(i) and (iii).

Agency: HHS Community: LOS ANGELES(EASTSIDE,PICO UNION,WESTLAKE)
Waiver: AFDC
Description: Waive 45 CFR Section 402(a)(1)

Agency: HHS Community: LOS ANGELES(EASTSIDE,PICO UNION,WESTLAKE)
Waiver: AFDC
Description: Waive 45 CFR 233.90(b)(2) and Section 1115 of the SSA

Agency: HHS Community: LOS ANGELES(EASTSIDE,PICO UNION,WESTLAKE)
Waiver: AFDC
Description: Waive 45 CFR 233.10(a)(3)(iii)

Agency: HHS Community: SAN FRANCISCO(BAYVIEW,HUNTERSPOINT,SE)
Waiver Community Initiative Program
Description: Appendix 7 (A) - Job creation for low income persons

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: SAN FRANCISCO(BAYVIEW,HUNTERSPOINT,SE)
Waiver: Integrated Funding
Description: Waiver on Returning unspent federal dollars Page III-18 (A).

Agency: HHS Community: NEW HAVEN/HAMDEN
Waiver EPSDT
Description: Substance abuse is a serious problem that is prevalent among inner city adolescents who have no resource to pay for treatment in a privatte setting. It may be possible, after many months, for them to get into treatment if they go through the Department of Children and Families (DCF); however, most parents are reluctant to do that for fear that any younger child will be taken from them. There is also a stigma attached to being a "DCF" family. Since many of these children are on Medicaid, many of these youth could receive the treatment that they need if a waiver was granted for EPSDT.

Agency: HHS Community: CHICAGO(NEW ENGLEWOOD)
WAIVER: AFDC Asset Limitations
Description: Requests a waiver of all AFDC asset limitations within the Empowerment Community. See page 32 of strategic plan for details.

Agency: HHS Community: CHICAGO(NEW ENGLEWOOD)
WAIVER: S.S.A. & S.S.I. Limitations
Description: Requests waiver of the asset limitations imposed on recipients of S.S.A. and S.S.I benefits in the Enterprise Community. See page 32 of the strategic plan for details.

Agency: HHS Community: CHICAGO(NEW ENGLEWOOD)
WAIVER: Medicare Asset Limitations
Description: Requests waiver for all medical cardholders' asset limitations for residents of the Enterprise Community. See page 32 of the strategic plan for details.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver: asset limitations
Description: Waive asset limitations for student welfare recipients to allow them to seek post-secondary education as an "allowable" training activity. Current rules giving the State discretion to approve these requests on a case-by-case basis are rarely granted.

Further, waive the federal rule that counts all aid provided to student welfare recipients not spent on tuition as income. Application of this rule often has the effect of cutting off welfare and food stamps. Hardest hit under this rule are single parents with small children, who are often forced to choose between an education and aid for themselves and their families.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver: unemployment benefits
Description: Waive restrictions on receiving unemployment benefits while seeking and partaking of training related to job opportunities within the area. Application of current law often sees such persons lose unemployment benefits because their schooling renders them unavailable to seek and be ready to work each and every week.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver: Fresh Start
Description: Family responsibility under Fresh Start: barriers in current federal regulations that normally prevent families from receiving assistance, or from working, have been eliminated under the Fresh Start demonstration. These should be replicated throughout the Enterprise Community area.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver all federal agencies
Description: Page 43 Seek waivers from all relevant federal, state and local agencies in order to ensure that the quality of health care is equal to usual and ucstomary care in the are as it relates to procedures, medications, services and health care provider fees.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver JOBS 40% state match
Description: Page 60 item 25. Congressional waiver of 40% state match requirement under the JOBS program so Chicago can asccess all or a portion of the $27 million.

Agency: HHS Community: CHICAGO (WESTSIDE)
waiver: case mgt.
Description: Seek waivers from all relevant federal, state and local agencies in order to ensure a comprehensive approach to service delivery utilizing assisting agencies along with a universal case management system.

Agency: HHS Community: CHICAGO (WESTSIDE)
waiver: Medicaid
Description: Secure waivers to allow Medicaid and otlher private providers to reimburse shcool-based and school-linked health centers for student services on a fee-for-service basis until sufficient data are available to determine a per-capita rate.

Agency: HHS Community: CHICAGO (WESTSIDE)
waiver: Child Care Dev. Block Grant
Description: Waive the requirement under the Child Care Development Block Grant program that the State pay licensed and unlicensed service providers at the same rate. The current rule removes incentives for seeking a license, thereby undermining a primary CCDBG objective: to provide safe, high quality care for children.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver Head Start 3
Description: Page 70, item 8. Seek waiver to enhance Head Start by providing support for program infrastructure and quality assurance during a period of rapid expansion of program. Program should provide for targeted parent education and life skills enhancement.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver Title XX
Description: Page 65, Item 3. Permit Title XX funds to be used as a guarantee to secure private financing in the development of affordable and accessible housing or economic development of affordable housing or economic development projects. This flexibility would enable the City to leverage private investment by reducing the risk.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver Section 8 Public Housing
Description: Page 65. Adjust income, equity and assets thresholds that trigger a loss of reduction of assistance under federally sponsored program i.e. subsidized public, food stamps, Medicaid, CEDA, energy, SSA, SSI, Child Care.

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver Section 8 Public Housing
Description: Page 65. Adjust income equity and assests thresholds that trigger a loss or reduction of assistance under federally sponsored programs i.e.
Head Start. Will eliminate a set of disincentives to individuals and families currently receiving assistance who are seeking training or employment related opportunities or trying to accumulate savings while receiving public assistance.

Agency and Waiver Request:

Agency: HHS Community: CHICAGO (WESTSIDE)
Waiver Title XX
Description: Page 65, item 2. Permit federal resources Title XX to be drawn down in advance and deposited in escrow upon closing to be disbursed based on qualified program activities.

Agency: HHS Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver income thresholds
Description: Adjust income thresholds so that working poor can take advantage of federally sponored programs including child care and Head Start.

Agency: HHS Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver headstart
Description: Allow Title XX, CDBG, and IV-A funds to be used to enhance Head Start programs through the purchase, renovation and construction of facilities.

Agency: HHS Community: CHICAGO (CALUMET ENTERPRISE COMMUNITY)
Waiver line item transfers
Description: Budget commitment to allow EC to do flexible line-item transfers of funds.

Agency: HHS Community: INDIANAPOLIS
Waiver-51% low-to-moderate income
Description: See pages 30, 34 and 40

Agency: HHS Community: FALL RIVER
Waiver request AFDC
Description: page 15 of EC narrative: The waiver request would modify the regulations governing earning inclusions in the calculation of reductions in welfare benefits.

Agency: HHS Community: CAMBRIDGE
Waiver FDA
Description: WAIVE RULES PROHIBITING ANYONE YOUNGER THAN 19 YEARS OLD FROM ENTERING A BIOTECH LAB

Agency: HHS Community: NEW BEDFORD
WAIVER - SSBG
Description:

Agency: HHS Community: MUSKEGON
Waiver 3
Description: Muskegon asks for waivers from current policy to achieve the following goals.

Agency: HHS Community: MUSKEGON
Waiver - Medicaid
Description:

Agency: HHS Community: MUSKEGON
Waiver - Medicaid
Description:

Agency: HHS Community: MUSKEGON
Waiver Medicaid
Description: Muskegon asks for waivers from "current policy" to achieve the following goal:

Agency: HHS Community: WINSTON-SALEM
Waiver AFDC Food Stamps
Description: Waive Vehicle Value Limitation for selected participants associated with OFF, JOBS, Project Self-Sufficiency and special programs of HAWS: increase from $1,500 to $6,000.

FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: WINSTON-SALEM
Waiver AFDC transitional benefits
Description: Waive transitional benefits for AFDC recipients participating in OFF, JOBS, Project Self-Sufficiency & Special Housing programs: increase from 1 to 2 year period for child care/medicaid.

Agency: HHS Community: WINSTON-SALEM
Waiver Medicaid
Description: Waive asset limitations for participants in OFF, Project Self-Sufficiency and Case Management programs: limit the amount of savings that a family/family member may accrue while receiving Medicaid/other benefits or qualifying for assisted housing: allow accrual of savings for education and/or move to market housing.

Agency: HHS Community: GREENSBORO
Waiver Consolidated Apps Request
Description: Consolidated applications. Residents applying for various governmental benefits must fill out a different application for each one and say that a consolidated appliction should be used for different agencies. Residents are also troubled by anapparent lack of linkage and information sharing between government agencies. Residents are asking for waivers of requirements that inhibit coordinated and efficient service delivery.

Agency: HHS Community: GREENSBORO
Waiver Confidentiality Request
Description: Confidentiality. Each individual human service program require's its own confidentiality (release of information) form. A universal form used by all agencies would be very helpful to the client in accessing services. It would need to be general enough for each agency to use and specific enough to protect information the client did not wish to share.

Agency: HHS Community: GREENSBORO
Waiver: Elderly
Description: Waiver: Elderly and Handicapped people on fixed incomes (SSA, SSI, retirement) Medical Deductions are allowed but are tedious to compile. A standard deduction for non-medical fixed income recipients would be helpful.

Agency: HHS Community: GREENSBORO
Waiver: Elderly
Description: Waiver to eliminate the value of current and prior years automobiles in determining eligibility. Someone could have a catastrophic emergency resulting in no income and the value of their car could disqualify them.

Agency: HHS Community: GREENSBORO
Waiver: Welfare
Description: Waive Welfare rules that make it difficult to start a business when acumulating assets over a certain amount either business or personal, will cause a loss of welfare benefits, and working over 100 hours a month may cause a loss of benefits before the business is generating sufficient income to cause ineligibility.

Agency: HHS Community: GREENSBORO
Waiver: Child Day Care
Description: Child Care: Waive the ineligibility requirement for married working poor families for services such as day care and transportation. A sliding scale would be preferred by these families.

Agency: HHS Community: TRENTON
Waiver SSBG staffing funds
Description: A. 158. The city has requested a waiver, if necessary, to use SSBG funds for staffing to promote neighborhood organization.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Income support services
Description: Waive current policy for Income Maintainance Center

Agency: HHS Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Income support services
Description: Follow new NYS policy initiative by creating Pilot Program

Agency: HHS Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Income support services
Description: Waive AFDC policy to implement CAP+ program

Agency: HHS Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Income support services
Description: Continue entitlement benefits during transitional phase of training and/or first year of work

Agency: HHS Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Medicaid
Description: Continue medicaid benefits for poor, working families

Agency: HHS Community: YONKERS
Waiver: Provide Medicaid Reimbursed
Description: Allow more than one agency to provide Medicaid Reimbursed Treatment. Current Medicaid rules prohibit more than one agency from working with a client's mental health needs at the same time.

Agency: HHS Community: YONKERS
Waiver: Job Trainees Receiving Stip
Description: Welfare or Home Relief Recipients who receive Training should be able to continue receiving full benefits while collecting their training stipend.

Agency: HHS Community: WARREN
Waiver SSBG EC
Description: Wants to waive SSBG requirement to acquire buildings. page 43 of plan

Agency: HHS Community: AKRON
Waiver medicaid
Description: Section 1115 Medicaid waivers applied for by the State of Ohio Dept. of Human Services. (pg. 233)

Agency: HHS Community: COLUMBUS
Waiver: subsidize wages
Description: Waivers to use ADC PA payments and to cash out food stamps to subsiize wages for hiring.

Agency: HHS Community: ERIE
Waiver Day Care Payments ex-welfare
Description: Waiver p. 5-16 Allow welfare day care payments to working ex-welfare parents.

Agency: HHS Community: ERIE
Waiver Day-Care Payments to Ex-Wel
Description: Allow welfare payment checks to go directly to providers. P. 5-16.

Agency and Waiver Request:

Agency: HHS Community: BEAVER FALLS
Waiver - Cut welfare benefits
Description: Request waiver to cut welfare benefits. Applicant sites, a number of regulatory barriers and states that waivers required to current AFDC policy such as to educational savings.

Agency: HHS Community: BEAVER FALLS
Waiver Cut Welfare Benefits
Description: Request waiver to cut welfare benefits: a number of regulatory barriers and states that waivers required to current AFDC policy such as ability to own a car for employment purposes;

Agency: HHS Community: BEAVER FALLS
Waiver Cut Welfare Benefits
Description: Request waiver cut welfare benefits: Applicant sites a number of regulatory barriers and states that waivers required to current AFDC policy such as to extend coverage to working families, etc.

Agency: HHS Community: PHILADELPHIA(NORTH AMERICAN STREET)
Waiver: Access to daycare
Description: Extend amount of time after employment that welfare recipients have access to daycare from 14 months to 36 months.

Agency: HHS Community: HARRISBURG
Waiver Neighborhood Program
Description: Neighborhood Development Program need start-up funds in order to have a chance at achieving a successful program: requirement that "measurable achievements" be presented by an applicant. page 65 Community Development and Services (A)

Agency: HHS Community: HARRISBURG
Waiver Children & Youth
Description: Limits on eligibility of funding for Children and Youth services; also "non-replication" requirement that if a program is funded it is not eligible for a subsequent year's funding pages 65,66 Community Development and Services (A)

Agency: HHS Community: PHILADELPHIA (NORTH CENTRAL)
WAIVER: Continuance of Benefits
Description:
North Central Philadelphia's EC application requests a "continuance of benefits" waiver to allow retention of such benefits as Medicaid, child care, and food stamps for 1-2 years by women who have recently been employed or who have enrolled in training and school programs. Level of income would not be the sole indicator of need for the continuance of benefits. Other factors would also apply, such as number of children, type of employment, length of schooling or training, and age of the woman. (Sec. IX-46)

Agency: HHS Community: SPARTANBURG
Waiver Medical Assistance
Description: Waiver for EC residents to be eligible for AFDC and Mediciad assistance for the first 12 months after an EC resident has gained employment.

Agency: HHS Community: COLUMBIA
Waiver Headstart 20% match
Description: Headstart: Eliminate 20% match requirement to facilitate expansion of Headstart program. See waiver section of volume 2 of application and page 35 of application

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: PORTSMOUTH
Waiver
Description: A waiver to existing regulations which discourage small business entrepreneurship by eliminating health care benefits (p. 3-31).

Agency: HHS Community: BURLINGTON
Waiver - Medicaid
Description: Waive various requirements that limit flexibility and consumer control over services to the elderly and disabled (pp. 269-270, 120, and 134 of Strategic Plan).

Agency: HHS Community: MOBILE
Waiver - parenting classes for AFDC
Description: HHS consider policy revision or waiver that mandates parenting class enrollment for all AFDC recipients within Empowerment Zones.

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver Medicaid/Medi-Cal
Description: Joint Federal/State Program - eligibility tied to AFDC - similar waivers requested

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Year round lunch
Description: Year Round Lunch-expand service to all family members not just children, AFDC seeking funding.

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 State Child Care Food Prog
Description: Income guidelines for State Child Care Food Programs is different then that for Head Start. Proverty rate should be adjuste for cost of living.

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Income guidelines
Description: Make income guidelines uniform across all programs in Empowerment Zone

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Test Pilot Intake forms
Description: Test pilot standardized intake form for all in the Empowerment Zone

Agency: HHS Community: OAKLAND/SAN LEANDRO/ALAMEDA
Waiver 2 Project Reclaim
Description: Identify a lead case manager for participants in multiple EZ projects (or case management team). Reduce # of agencies and/or individuals/families deal with.

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: GAIN
Description: Waive the inclusion of any EZ GAIN participants in the State's formula for meeting the Federal JOBS participation rate; simplify the Federal Advance Planning Document (APD) approval process in order to recieve the electronic data processing services in time to incorporate EZ residents; waive the state/local match requirements for EZ residents; Waive the Federal requirement for uniform delivery of JOBS services throughout the state; Extend benefits for JOBS to a minimum of 12 months beyond placement;

Agency and Waiver Request:

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver 12: AFDC and others
Description: Waive requirements that require state to provide matching funds for maternal and child health programs; establish a pilot program where AFDC school age children must regularly attend school to receive full benefits; extend benefits for a transition period beyond AFDC; set up a pilot program to determine if elimination of the labor face attachment and 30 day waiting period contributes to family breakups;

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver CCDBG
Description: Waiver of the allocations methodology in order to target funds to EC/EZ areas; revise regs to allow upkeep and maintenance of Child Care spaces;

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: Substance Abuse Prevention/
Description: Waiver to eliminate the funding set-aside requirements for local governments and increase discretionairy funding; allow SAPT funds to permanently improving owned and leased facilities.

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: Center for Substance Abuse
Description: Waiver to eliminate all federal grant match requiements to enable small community based nonprofits the ability to compete.

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver: McKinney Program
Description: Remove categorical limitations on services

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver 5 matching funds/maternal
Description: Waive the federal regulations that require California and governmental entities under contract by the State to provide matching funds for maternal and child health programs.

Agency: HHS Community: LOS ANGELES/LA CO/VERNON/LYNWOOD
Waiver 23: reallocat. for capital
Description: Allow Federal funds allocated to CBOs providing social services to be used for capital projects.

Agency: HHS Community: DADE COUNTY/MIAMI/HOMESTEAD/FLORIDA CITY
Waiver: Title XX:294 Revis re:MH/DD
Description: REQUEST: Revise chaper 394 of the Title XX State Alcohol, Drug Abuse and Mental Health Act areas to support access to community mental health services for persons with Developmental Disabilities. [CITE: State of Florida, Title XX, Chapter 394] STATUTORY ACTION REQUIRED

Agency: HHS Community: ATLANTA
Waiver - SSBG,AFDC, ETC.
Description: The City is requesting a waiver to allow SSBG $ to be used as matching funds.

Agency: HHS Community: ATLANTA
Waiver - AFDC
Description: Waiver to allow partner agencies to certify eligibility for AFDC, Food Stamps, WIC, Medicaid, Head Start and Child Care Services; (see page 11, Executive Summary).

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: SIOUX CITY
Waiver Title XX
Description: Sioux City proposes to use EZ/EC funds to acquire or improve land or facilities primarily for economic development purposes and to create job opportunities.

Agency: HHS Community: CHICAGO
Waiver All Federal agencies
Description: See page 43-seek waivers from all relevant federal, state , and local agencies in order to ensure that the quality of health care is equal to usual and customary care in the area as it relates to procedures, medications,services and health care provider fees

Agency: HHS Community: CHICAGO
Waiver -Head Start3
Description: See page 70-Item 8-Seek waivers that would enhance Head Start by providing support for program infrastructure and quality assurance during a period of rapid expansion of the Head Start program. The program also should provide for trageted parent education and life shills enhancement.

Agency: HHS Community: CHICAGO
Waiver Head Start
Description: Waiver to permit early testing for hearing and vision before age 3. Page 70 - Item 9.

Agency: HHS Community: LOUISVILLE/JEFFERSON COUNTY
Waiver-AFDC
Description: Waive the income disregard requirements by approve the State request not to reduce federal AFDC subsidies until recipients reach 100% of poverty. pg 15-36

Agency: HHS Community: BALTIMORE
Waiver Work Supplement Program
Description: 250.62(b)(2): Waive the provision that grant diversion can only be used for newly created jobs for AFDC recipients in the EZ; allow grant diversion funds to be used for any job openings. Ref: Vol3, Chp5-6

Agency: HHS Community: BALTIMORE
Waiver Welfare Reform
Description: 250.62 (Grant diversion or work supplementation): want permission to create a wage pool & divert grnat funds for up to two years & allow flexibility in the types of jobs tht can be paid for under grant diversion. Ref: Vol3 Ch5 p8. Title IV-A of the S.S. Act & 402(a)(19): city wants to relax JOBS participation rates to EZ households from the denominator in calculations.

Agency: HHS Community: BALTIMORE
Waiver Welfare Reform
Description: Grant diversion or work supplementation: Waiver
Title IV-A of the Social Security Act and 402(a)(19): City wants to relax JOBS participation rates to EZ households from the denominator in calculations. Ref. Vol. 3, Chpt. 5, P.8

Agency: HHS Community: BALTIMORE
Waiver Welfare Reform wage pool
Description: Grant diversion or work supplementation. Waiver: Permission to create a wage pool and divert grant funds for up to two years. Ref. Vol. 3, Chpt. 5, P.8

Agency: HHS Community: BALTIMORE
Waiver Welfare Reform job flexible
Description: (Grant Diversion or work supplementation) Allow flexibility in the types of jobs that can be paid for under grant diversion. Ref: Vol3, Chp5, p8

Agency and Waiver Request:

Agency: HHS Community: FLINT
Waiver 2- AFDC
Description: Applicant seeks waivers related to welfare to work program proposals. See pages IV-24 to IV-26. Waivers to extend Medicaid benefits and public housing or other housing subsidies.

Agency: HHS Community: BENTON HARBOR/BENTON TOWNSHIP
Waiver: Match for Park facility
Description: Allow use of SSBG for local match for State-funded park facility improvements needed for comprehensive employment, social, and recreational programs for youth. See page 3 of Appendix G and pages 67, 77, and 117 of Strategic Plan.

Agency: HHS Community: ST LOUIS/WELLSTON/ST LOUIS CO
Waiver Welfare Reform
Description: Waiver: Page IX 33 - The State of Missouri requested and received a waiver from the Federal Government allowing AFDC and Food Stamp funds to be used as wage supplements. State legislation authorizing this initiative is pending.

Agency: HHS Community: ST LOUIS/WELLSTON/ST LOUIS CO
Waiver Welfare Reform
Description: Page IX 33 - The State of Missouri requested and received a waiver from the Federal Government allowing the AFDC and to relax the amount of savings a family can accumulate to receive benefits. State legislation authorizing these initiatives is pending.

Agency: HHS Community: ST LOUIS/WELLSTON/ST LOUIS CO
Waiver: Welfare Reform
Description: Waiver Page IX 33 - Waiver from Federal Government granting the extension of AFDC and Food Stamp assistance for two months from start of employment. State legislature authorizing this initiative is pending.

Agency: HHS Community: NEWARK/ELIZABETH
Waiver Ryan White Title II
Description: waiver on state pass throughs so that the city can be directly funded

Agency: HHS Community: NEWARK/ELIZABETH
Waiver: AFDC two parent families
Description: Waiver to eliminate the special requirement that two-parent families only be eligible when the principal wage earner is unemployed and has worked 8 of the last 13 quarters.
p. 153, 4.

Agency: HHS Community: NEWARK/ELIZABETH
Waiver: AFDC auto limit
Description: Waiver to increase the AFDC automobile limit to an equity value of $3,500. See p. 153,4

Agency: HHS Community: NEWARK/ELIZABETH
Waiver: AFDC supplemental payments
Description: Waiver to require New Jersey to offer supplemental payments for said services. p. 154

Agency: HHS Community: NEW YORK COUNTY/BRONX COUNTY
Waiver Subsidy/Lead Screening
Description: Allow up-front Medicaid subsidy for lead screening to permit investment based on an identified pool of all children in Zone. See Appendix P, page 5.

Agency and Waiver Request:

Agency: HHS Community: CLEVELAND/CUYAHOGA COUNTY
Waiver ADC grants and food stamps
Description: See pg 115
1)Allow the use of ADC grants and cash-out of food stamps to supplement wage payments by employers.

Agency: HHS Community: CLEVELAND/CUYAHOGA COUNTY
Waiver ADC Grants & Food Stamps
Description: Page 115, Waive ADC-U work history requirements to allow more two-parent families to be eligible for public assistance.

Agency: HHS Community: CLEVELAND/CUYAHOGA COUNTY
Waiver ADC Grants & Food Stamps
Description: Page 115.
Request SDA to allow food stamps to follow ADC children into new households.

Agency: HHS Community: OKLAHOMA CITY
Waiver Ryan White Title I
Description: Care Point - Ryan White (Waiver) - Remove Title I stipulation re low incident state.

Page 54 of Strategic Plan

Agency: HHS Community: OKLAHOMA CITY
Waiver Community Health Ctr.
Description: Waiver Community Health Ctr. Sec. 330 PHS Act and Title XIX - Medicaid Grant period from 1 to 3-5 years, one third non federal sources, eligibility for pregnant women to 200% poverty and all individuals at poverty level and age 21-64.

Agency: HHS Community: PHILADELPHIA PA/CAMDEN NJ
Waiver JOBS program
Description: Waiver 45 CFR 250.78A. Federal requirement resuting in the state imposing a "twenty-hour rule" on all participants in its Single Point of Contact program (SPOC). See SPOC Guidelines part II, Sec. I F 1. under this rule, each client must participate in a min. of 20 hrs of education or training per week which makes it difficult and sometimes impossible for individuals to attend community college through the SPOC program.

Agency: HHS Community: PHILADELPHIA PA/CAMDEN NJ
Waiver Transitional Child Care
Description: Waiver: Transitional Child Care. With regards to transitional child care, because the waiting lists with the Title XX program, the Federal regs limiting TCC to one year should be waived to provide for availability of TCC until a Title XX or At Risk slot becomes available. 45 CFR 256.2c. (This requires statutory waiver, 42 USC Sec. 602(g)((1)(A)(iii), within HHS jurisdiction.

Agency: HHS Community: PHILADELPHIA PA/CAMDEN NJ
Waiver JOBS
Description: Waiver: The JOBS Program requires states to ensure that an increasing percentage of AFDC households participate in a JOBS activity. Again, participation is defined as 20 hours per week. 45 CFR 250.78. Community college students are credited only with 16 hrs per week and are not allowed to fulfill their participation requirement through classroom training or education. This extra requirement for two-parent families contributes to family instability and should be waived. 45 CFR Sec. 250.33a. This puts states under pressure to move to Community Work Experience Program (Workfare) placements and short term training, neither of which have the potential of community colleges to facilitate a breakout from the poverty cycle.

Agency and Waiver Request:

Agency: HHS Community: KNOXVILLE
Waiver - Conflict of Interest Rules
Description: A reinterpretation of the conflict of interest rules to allow an HHS representative to serve as a voting or non-voting member of the Partnership for Neighborhood Improvement. (p. 29)

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC
Description: Waiver Section 402(a)(18) and provisions at 45 CFR 233.20(a)(3)(xiii): Gross Income Test-allow the State not to apply the 185% waiver period.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC earned income
Description: Section 402(a)(8)(A)(ii), (iv) and various provisions of the regulations at 45 CFR 233.20(a)(7)(ii); and 45 CFR 233.20(a)(11)(i)(B), (i)(E) and (ii) (B): Earned Income disregards--to allow the State to not apply the current $90 disregard and time-limited 4\$30 and one-third disregard.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC Differential
Description: Waiver Section 402(a): Differential Payments -- to allow the State to implement a different method for determining eligibility for and the amount of AFDC for a family participating in the EZ/EC project for a given month. Specifically, from the Federal poverty guidelines applicable to the family, subtract the family's income (after application of applicable regards). If the difference is a positive number, then the family may be eligible for AFDC. This difference is the monthly benefit payment, but such payment may not be made to the extent that it exceeds 90 percent of the standard of need, or 100 percent of the standard of need in the case of a family participating in the Virginia Incentives to Advance Learning (VITAL) demonstration project.

Agency: HHS Community: NORFOLK
Waiver Title IV-A AFDC JTPA earning
Description: Waiver Section 402(a)(8)(A)(v) and provisions at 45 CFR 233.20(a)(11)(vi): JTPA Earnings to allow the State to disregard any earnings received by a dependent child(ren) of a EZ/EC participant, as a result of participation in a Job Training and Partnership (JTPA) program for as long as such children continues to participate in the JTPA program.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC lump sum
Description: Waiver: Section 402(a)(17) and provisions at 45 CFR 233.20(a)(3)(F):
Lump sum payments -- to allow the State to pay AFDC benefits for a given month, unless the total amount of the family income attributable to that month (including for this purpose attributing any lump sum income solely to the month in which such lump sum is received) after application of applicable disregards, is greater than 100% of the Federal poverty guidelines for the family.

Agency: HHS Community: NORFOLK
Waiver Title VIA AFDC unearned inc.
Description: Waiver -- The matter preceding paragraph (A) in Section 402(a)(7) and provisions of 45 CFR 233.20(a)(3)(ii): Unearned income -- to allow the state not to count as income to the unit the interest or dividends received by the AFDC unit through ownership of bank accounts, bonds, mutual bonds, or other conventional savings accounts or funding methods established pursuant to participation in this project.

Agency and Waiver Request:

Agency: HHS Community: NORFOLK
Waiver IVA AFDC HUD stipends
Description: Waiver The matterof preceding paragraph (A) in Section 402(a)(7) and provisions of 45 CFR 233.20(a)(3)(ii) Unearned income -- all the state to disregard HUD stipends or incentive payments granted on behalf of any participating household.

Agency: HHS Community: NORFOLK
Waiver Title IV-A: AFDC
Description: Waiver: Sections 402(a)(7)(A) and 402(a)(8)(A)(i) and provisions of 45 CFR 233.20(a)(ii)(ii)(A); Other Income disregard: to allow State to disregard the gross income of any eligible child, whether or not the child(ren) is full time or part time student, for the first two years of the family unit's participation in the EZ/EC program.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC resource lmt
Description: Waiver: Section 402(a)(7)(B) and provisions at CFR 233.20(a)(3(B): Resource limit -- to allow the State to not apply a resource test to AFDC families during their participation in the EZ/EC program.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC unemployment
Description: Waiver: Section 402(a)(41) and various provisions at 45 CFR 233.101(a0(1(i) and (ii), (3)(i), (ii), (iii) and (iv) and (c)(1)(iii) and (iv) and (2)(i) and (ii): Unemployment parent provisions -- to allow the State and to provide benefits to both parents, without regard to the AFDC Up requirement for previous quarters of work history, the 30 days of prior unemployment rule, the failure to accept bona fide offers of employment rule, and the 100 rule.

Agency: HHS Community: NORFOLK
Waiver Title IVA AFDC JOBs
Description: Waiver: Section 402(a)(19)(B)(i) and various provisions of the regulations at 45 CFR 250.30: Jobs Participation Requirements: to allow the State to permit the relatives identified at 45 CFR 233.90(c)(1)(v)(A) who are not AFDC recipients, but who are Food Stamp recipients living in the same household with EZ/EC participants, to participate in the JOBS training program.

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: HHS Community: RICHMOND
Waiver: Dept of Mental Health
Description: The Federal Substance Abuse Prevention and treatment (SAPT) block grant requires that interim services be provided to persons on waiting lists for substance abuse treatment programs and that those services be documented. MHMRSA feels that this is an unfunded mandate which results in decreased service availability for Richmond residents. In the absences of full funding for the mandate, staff must be "pulled" from existing service programs, (the same ones for which there are already waiting lists), in order to provide the required interim services, reducing the number of staff available within the the service programs to provide the needed treatment these clients are waiting for, thereby increasing the amount of time they must spend on waiting lists. Further, requirements that these interim services be documented necessitates the allocation of administrative resources to document, store and report on the required interim services. Agian, in the absence of funding to fulfill this requirement, clinical staffing must be reduced in order to develop the necessary administrative supports, which further reduces the availability of services and increaseing the time Richmonders spend on waiting lists.

In addition, this grant requires that substance abuse treatment programs report, on an ongoing basis, fluctuations above and below 90% utiliization of program capacity to the State Department of MMRSA. Yet, this has never been known to occured, because all substance abuse treatment programs routinely run at 90% or greater capacity, and therefor is no place available to which tranfser of such waitng list clients could be accomplished. Furthermore, the requirement that these capacity status reports be documented necessitates the allocation of administrative rescources to document, store and report on the required capacity utilization information. Staffing must then be reduced to develop the necessary administrative supports, reducing the availablity of services.

Agency: HHS Community: RICHMOND
Waiver: Eligibility for Service.
Description: A waiver allowing eligibility for groups based on Social Service need & location within the boundaries of the EZ/EC project area. Would require a Waiver of SSBG policy ate the State level.

Agency: HHS Community: RICHMOND
Waiver: Social & Personal Responsib
Description: Placing personal responsibility on families, as prerequisites to receiving AFDC & or food stamps- would require waivers.

Agency: HHS Community: RICHMOND
Waiver Resource for Educ. & Housing
Description: A change in the policy guidelines f0r determining the eligibility & grant amt of AFDC faimilies to accumulate $5000 in resources if they are to be used for Educ. & Homeownership. Income should not be counted in the determination of the families AFDC grant.

HHS total: 134

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: Community: PEORIA
Waiver: Single Fed. Applic. Review
Description: REQUEST: Single reviewer handling for all pending Federal grant applications for programs included in the Empowerment Zone, rather than at the various agencies where grants have been submitted -- in order to bring about greater familiarity with the City program, inter-relationships of various interacting programs, paperwork and review time savings. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: Single Annual Applic Forma
Description: REQUEST: Allow single annual application format from city containing appropriate info for all participating agencies and programs. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver:Broader Eligbility for SSBG
Description: REQUEST: Social service block grant funds and other Federal EZ directed program funds be permitted to be used interchangeably and that eligible uses of all programs be mutually inclusive. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: Use of Funds Outside Zone
Description: REQUEST: Allow funds made available for use in Zone from all Federal programs be permitted to be used outside of Zone where there can be demonstrated a direct linkage of benefits to Zone residents (e.g., businesses outside of Zone could receive funds if residents could be employed/ public facilities or services could be housed in location outside of Zone so long as residents are benefited. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver:Eligible EZ Incentives in EC
Description: REQUEST: That all incentives (i.e., wage credit, increased Section 179 deductions, etc.) be made available to EC designees as well as EZ communities. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: Prog Bond Lng Trm Fnancing
Description: REQUEST: In order to undertake long-range program initiatives that require early sale of bonds to finance activities, want the Federal Government to guarantee bonds in order that lower interest rates could be achieved and the bonds more saleable in the marketplace. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: SS Restriction for Gen Admn
Description: REQUEST: That the current controls on the percentage of funds that could be used for general administration be removed for all applicable social service programs. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: Multple Yr Fnd Commitments
Description: REQUEST: That in order to carry out long-term programmatic activities that various Federal agencies be permitted to make multiple year funding commitments for Zone directed programs. [NO CITE] ACTION REQUIRED UNCERTAIN

Agency: Community: PEORIA
Waiver: Expansion of EZ/EC Pro
Description: REQUEST: That appropriate changes be made in the EZ/EC statute to allow more than 104 communities to participate in the program; as well as more designated EZs in both urban and rural areas. [NO CITE] STATUTORY ACTION REQUIRED

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: Community: PEORIA
Waiver 106 Rvw/Dvs Bcn/EPA Liab
Description: REQUEST: Section 106 review process -- waive [CITE: 800.4(a),(b) & (c); 800.5(b),(c) & (d); 800.6(a),(b),(c),(d) & (e); 800.7 & 800.8] Davis bacon prevailing wages provisions for contracts in excess of $2,000 w/regard to job training and apprentice programs - waive [CITE: 29 CFR Section 5.5 and 29 CFR Section 5.16] EPA liability rules for properties purchased for redevelopment. STATUTORY ACTIONS REQUIRED

Agency: Community: PEORIA
Waiver: State Grants
Description: REQUEST: Chapter 23 (Currently Under Review) on Public Assistance allows persons to lose benefits (i.e., health care, child care) when they become gainfuly employed [NO SPECIFIC SITE] STATUTORY ACTION REQUIRED

total: 0

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: ALL Community: DEKALB COUNTY
Waiver: All agencies.
Description: Make Federal guidelines for funding more flexible to allow communities to focus on their defined needs and outcomes rather than federally determined criteria.

Agency: ALL Community: DEKALB COUNTY
Waiver: All agencies.
Description: Improve efficiency in the allocationor deistribution mechanisms for Federal funds to loca communities.

Agency: ALL Community: DEKALB COUNTY
Waiver: All agencies.
Description: Change the process by which administrative costs associated with collaboration initiatives are calculated.

Agency: ALL Community: DEKALB COUNTY
Waiver: All agencies.
Description: Provide technical support for coalition development.

Agency: ALL Community: SEATTLE
WAIVER: Federal Land Disposition
Description: Government-owned land parcels, acquired as long as 25 years ago during urban renewal and Federal highway development projects, still remain in state and Federal ownership. These are a potential asset for future public-private development in support of affordable housing for low-income buyers. However, transfer process to City is lengthy & cumbersome. Request agency examination of current land disposition policies and guidelines for expediting transfer processes.

Agency: ALL Community: SEATTLE
WAIVER: Standardized Needs Assessmt
Description: Each time an agency or organization within the EC applies for funding, it must prepare seperate needs assessment statements. Request federal agencies develop a standardized and general needs assessment form for the EZ/ECs that all organizations can contribute to and/or have access to for submission as part of their individual grant applications.

ALL total: 6

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: ARC Community: KNOXVILLE

Waiver ARC eligibility for funding

Description: All areas within the Zone should be eligible for Appalachian Regional Commission funding regardless of the metropolitan area's overall economic condition. Residents should be the presumed beneficiaries of investments in the Zone. (p. 48)

ARC total: 1

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOC Community: SHREVEPORT
WAIVER EDA Business & Loan program
Description: WAIVER - Request that priority consideration be given to EZ/EC designees and applicants in all loan and business assistance praograms.

Agency: DOC Community: BENTON HARBOR/BENTON TOWNSHIP
Waiver: EDA Business Incubator
Description: Waive any restriction on use of EDA incubator funds and HUD UDAG funds for the placement of a business incubator and job training/placement site at the same facility. See page 1 of Appendix G and pages 49-52 of Strategic Plan.

Agency: DOC Community: KNOXVILLE
Waiver EDA Industrial land
Description: EDA's policy prohibiting the use of funds to develop "industrial land" and on the use of site acquisition and development costs as a local match should be relaxed in the Zone. (p. 48)

DOC total: 3

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOD Community: NEW YORK(WILLIAMSBURG/BROOKLYN NAVY YARD)
Waiver-Army Corps of Engineers
Description: Waiver of Federal regulations and transfer of "Admiral's Row" from Army COE to BNYDC (and thus the City) at no cost.

Agency: DOD Community: EAST ST LOUIS
Waivers Prime Contracts
Description: WAIVER #1: Proposals from firms located in EZ/EC for prime contracts with DOD or GSA should be given preferential treatment in the source selection process (pg. 153).

WAIVER #2: Any DOD and GSA prime contracts should be targeted to EZ/EC firms who can help meet federally mandated goals (pg. 153).

WAIVER #3: Proposals from prime contractors who use subcontractors located in EZ/EC should receive maximum preferential treatment by DOD and GSA for contract awards (pg. 153).

WAIVER #4: Any DOD contract with a 5% Small Disadvantaged Business (SDB) percentage requirment should contain a requirement that firms located in EZ/EC areas be used to the maximum extent possible (pg. 153).

WAIVER #5: R&D manufacturing pools located in EZ/EC should receive waivers from normal SBA certification process and be granted expedited SBA and DOD certification (pg. 153).

WAIVER #6: Funds from the Army Corp of Engineers should be provided to EZ/EC designated areas for major infrastructure repair and redevelopment.

DOD total: 2

Urban Empowerment Zones and Enterprise Communities
FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOI Community: DAYTON
Waiver Section 106 modification
Description: The waiver request is for modification of Section 106 to allow entire block areas to be considred as one block. This allows the State to review one package of material for buildings scheduled for demolition
etc. and determine if plan meets historical needs. pg. 44

Agency: DOI Community: WASHINGTON DC
Waiver on use of National Park land
Description: Request to make use of National Park Service land adajcent to a planned development near the Anacostia Metrorail Station (Page 8, Chapter X of Volume One, and Page 1, second part of Volume Two of the application)

DOI total: 2

Urban Empowerment Zones and Enterprise Communities

FEDERAL PROGRAM LEGISLATIVE OR STATUTORY WAIVER REQUESTS

Agency and Waiver Request:

Agency: DOJ Community: LOS ANGELES/LA CO/LONG BEACH/COMPTON/LYNWOOD
WAIVER: Property seizure
Description: To expedite the release of property and assests confiscated by Federal drug enforcement officials to the local jurisdictions.

Agency: DOJ Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver criminal justice grants
Description: Allow San Francisco to apply for all criminal justice grants for direct funding to local government - page III-17 (A)

Agency: DOJ Community: SAN FRANCISCO(CHINATOWN,TENDERLOIN)
Waiver daytime population figures
Description: When formula allocations are used and population is a criterion, use daytime population figure - page III-18 (A)

Agency: DOJ Community: SAN FRANCISCO(BAYVIEW,HUNTERSPOINT,SE)
Waiver criminal justice grants
Description: page III-18 (A) Allow SF to apply for all criminal justice grants through Washington, DC; when formula allocations are used and population is a criterion, use daytime population

Agency: DOJ Community: SAN FRANCISCO(BAYVIEW,HUNTERSPOINT,SE)
Waiver crime bills focus
Description: page III-19 (A) inclusion of a primary focus in any pending crime bills - schools districts have equal opportunity to collaborate and participate in Ounce of Prevention and Community Schools provisions

Agency: DOJ Community: COOK COUNTY
WAIVER DRUG MONEY
Description:

Agency: DOJ Community: PHILADELPHIA (NORTH CENTRAL)
WAIVER: Criminal Background Checks
Description: North Central Philadelphia's EC application requests elimination of criminal background checks for people who have completed the security training program operated by the crime and public safety workgroup, and have also met certain standards such as: all fines and court costs have been paid; restitution has been made; and probation requirements have been met. (Sec.IX-47)

Agency: DOJ Community: DENVER CITY AND COUNTY
Waiver-DOJ
Description: More flexible use of federal $$'s to a specific plan; federal rules should be more lenient in allowing cross agency funding of strategies impacting common problems

Agency: DOJ Community: DENVER CITY AND COUNTY
Waiver - DOJ
Description: Allow income average option for federal tax proposes, for families that have experience severe repercussins of a stagnant economy

Agency: DOJ Community: ROCHESTER
Waiver Discretionary programs
Description: WAIVER REQUESTED FROM STREET CENTERLINE REQUIREMENT THAT PLACE FACING PROPERTIES IN SEPARATE TRACTS EVEN WHEN BOTH SIDES ARE PART OF THE SAME NEIGHBORHOOD. WAIVER WILL ELIMINATE SERIOUS DIFFICULTIES IN ACHIEVING OBJECTIVES OF STRATEGIC PLAN & HARMONIZE REQUIREMENTS WITH CITY POLICY.

Agency and Waiver Request:

Agency: DOJ Community: KNOXVILLE
Waiver - information sharing
Description: There is a need to relax regulations related to information sharing in order to track offenders. (p. 59)

DOJ total: 11

EZEC

FAX

U.S. Department of Agriculture
Empowerment Zone and Enterprise
Community Program
Reporters Building, 7th Floor
300 7th Street S.W.
Washington D.C. 20024

To:	Sheryll Cashin
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Phone:	
Fax:	456-2823
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Company:	USDA, Empowerment Zone and Enterprise Community Program
Phone:	202-619-7982
Fax:	202-401-7420
Date:	3/30/95

Pages including this cover page: 7

Comments:

Per request.

CC: Paul Weinstein
Gaynor McCown

Rural info on Waivers. When is next meeting? -SDC

USDA RURAL EMPOWERMENT ZONES & ENTERPRISE COMMUNITIES

WAIVER REQUESTS BY AGENCY

March 30, 1995

Requests from Designated Areas

Health & Human Services (HHS):

- Use of SSBG funds.
- Programmatic changes in reporting eligibility of AFDC requirements; and other AFDC issues.
- Elimination of conflicting guidelines and eligibility requirements of programs affecting maternal/child health (e.g., **Medicaid**, WIC, food).
- State and Federal policies as related to welfare, particularly the sliding scale/income and medical waiver.
- Health care assistance. A major EZ initiative is to provide health care cost assistance to those persons in the EZ training programs and their families, if needed. Making even the most basic care available will help lower an obstacle - especially if taking in part of such a training program causes one to lose Medicaid benefits, and it can provide an incentive to those not having any care to stay in the program. Coverage of family members will ensure that this barrier is removed - sick kids make school and work difficult. Using the CHC network will mean that trainees and graduates will pay on sliding scale based on income. They can continue with the same doctor and medical personnel once they move into employment. Given the projected number of trainees, the estimated cost of the program over three years is $1,600,000 (Rio Grande Valley).
- Health care and emergency care providers request that fees be waived and yearly applications and certifications be spaced out from 2 to 5 years.
- Community Work Experience Program (CWEP) be expanded to permit assignment of participants to 40 hours per week at their work sites.

Department of Labor:

- Eliminate prevailing wage (Davis-Bacon) on base levels on specific data and determinations.
- Relieve prohibition on Job Training Partnership Act (JTPA) employment generating activities.
- Waive regulation prohibiting the sale of products created by workers in JOBS programs and JTPA funded programs.
- Certain federal and state procurement requirements to be reviewed or waived.
- Investigate funding distribution formula of the JTPA to eliminate inequities.
- To be able to handle youth and adult on-the-job-training (OJT) on same basis. Current regulations place more limits and restrictions on Youth OJT's. Regulations make management of Youth OJT's very difficult.

- To be able to offer employers OJT reimbursement to hire people who possess needed skills.
- Upgrading (allowing employers to promote existing staff and obtain reimbursement for new skills training, creating entry level job openings).
- Older Worker OJT - New regulations include the total household income for eligibility determination. Waiver requested to return to previous regulations where only the applicant's income was considered for individuals 55 years of age and older.
- Raise the JTPA income eligibility ceiling to $23,250 per household.

Department of Commerce:

- Reduction in amount EDA requires private investor to raise in seeking financial assistance from 15%-20% to 5-10%.
- Increase the amount of funds available to the CDC's from the National Telecommunications and Information Administration.
- EDA to increase or eliminate the lending limit of 1/3 of a revolving loan fund portfolio capitalization.
- EDA should advise if matching funds requirement and lending limit requirement can be waived for the Macon Ridge, LA, program.

Small Business Administration:

- Eliminate loan loss reserve fund as it is now written.
- Reduce SBA interest rate on the microloan fund to Community Development Corporations to 1%.
- Reduce SBA interest rate to SBICs.
- Require semi-annual or annual reports rather than quarterly.

Department of Agriculture:

- Flexibility of farmers in applying for voluntary systems to land management instead of complex federal agency controls.
- Farm Credit System Waiver from Farm Credit System to make loans to zone communities for public water systems.
- Allow EZ to be included in the Wetlands Conservation Program (Wetlands Reserve Program).
- Waiver to the environmental assessment regulations.
- Exceptions to 80% median income limits.
- Several issues surrounding the Food Stamp Program.
- Waive the state clearinghouse (A-95) process for the RDA IRP on the first round of lending, as well as subsequent loans made through the program.
- Allow local governments to apply for and administer Rural Electrification Administration grants and loans.
- Waiver of ceiling and population density formulas for determining allocations of federal and

state funds to rural areas served by the Central Savannah River Area (GA) EZ/EC.
- Waive RDA (FmHA) subsidy pay back policies which preclude homeowners from refinancing FHA mortgages at lower interest rates for the period of the EZ/EC.

Department of Education:

- Release programmatic mandates and regulations in state education programs.
- Accelerated loan forgiveness for graduates who pursue public service careers in the zone.

Department of Housing and Urban Development:

- Allow Community Development Block Grant (CDBG) set-aside of funds to be allocated in accordance with federal requirements and not be subject to existing state allocation limitations.
- Allow working residents in public housing to put amount of additional rent owed due to wage increase into escrow account for purchase/rehab of existing home.
- To be able to use 80% of the state median and/or 120% of the county median (Rio Grande Valley).
- Protection from rising rental costs based upon new income levels (Portsmouth, OH).
- Waive prepayment of mortgage insurance and reduce amount of paperwork; reduce income verification from 3 years to two or one.
- Allow CDBG payback to be considered miscellaneous income rather than program income.
- Allow local governments to use CDBG and other federal funds to provide free taps and line extensions to non low-to-moderate income residents who are in the project area for sewer and water line extensions.

Department of Transportation:

- Expedition of certain highways to facilitate industrial development and tourism.

Department of Justice:

- Broaden standards of acceptability that a jail must meet in order to legally detain prisoners.

FEMA:

- Waiver in local cost share requirements for water resource projects over 10-year period, in exchange for requirement of local governments participating in National Flood Insurance Program.

Department of the Interior:

- Urban Park and Recreation Recovery Program to allow rural communities to apply for program funds.

Environmental Protection Agency:

- Standardize the requirements for environmental impact studies required by various departments and agencies of the federal government for housing and business development project. They are time-consuming to complete and cost communities tax revenue when business start-ups are delayed.
- Solid Waste Landfills Technical Assistance during EZ/EC process. Department of Environmental Quality should provide technical assistance to the applicant party at every stage of the application process to prevent time delays; bonding requirements should be re-evaluated and made less cost prohibitive.
- Single beneficiary for industrial parks.

Office of Management and Budget:

- U.S. Congressional Legislation to reduce the local cost share of the St. Johns Bayou - New Madrid Flood Control Project from 35% to 5% (City of East Prairie Mississippi County, MO).
- U.S. Congressional Legislation to authorize and fund a non-biased, independent evaluation of the Birds Point - New Madrid Floodway Project.

General Services Administration:

- Designation of the Central Savannah River Area (GA) EZ/EC as a State and Federal Excess and Surplus Property Depot. This would permit the direct transfer of furniture, equipment and supplies to the Zone's network of human development, education and training, and regional support centers.

Department of Treasury:

- Acceleration of the 501(c)3 tax exempt determination for the organizational entity within the Zone to be made within 30 days of application (GA).

Sample Requests from Non-Designated Areas

Department of Agriculture:

- Higher income status to purchase homes under RDA (FmHA).
- Waive maximum population limit criteria for rural community participation in RDA (FmHA) housing and development programs.
- Request to make housing preservation grant less restrictive.

Environmental Protection Agency:

- Environmental assessment

Health and Human Services:

- Allow the applicant to use SSBG funds to renovate a building to house a substance abuse facility.
- Waiver so that individuals on ADC in the county can be allowed to acquire additional assets and higher income as they establish their employability or acquire capital to start a business.
- Requests modification of Health and Rehabilitative Services (HRS) regulations regarding the Medicare Waiver program which prohibits working by the client.

Department of Transportation:

- Eliminate the bottleneck in certain rural areas.

Department of Housing and Urban Development:

- Simplify Housing Assistance Programs.
- Federal freeze on CDBG allocations.

Office of Management and Budget:

- Restore Federal General Revenue Sharing or/and Equivalent Program.

Department of Labor:

- Under present federal job training system, especially in the JTPA program, hour limits are placed on some training programs, per participant. These rules should be waived for EC areas to really attack the problems of low education and skill development.

- Exempt construction companies with 25 employees or less from the Federal Davis-Bacon requirements.
- Waive Davis-Bacon requirements for prevailing wages.

Small Business Administration:

- In the small business loan and guarantee loan programs, waivers of rules are needed to allow low income borrowers in EC communities to have longer pay back terms, lower interest rates, and less equity injection requirements. This would greatly speed up the generation of new small businesses--the largest of all employers in rural areas, such as Arkansas.

Department of Commerce:

- The leveraging and credit requirements are too stiff for fledgling businesses. Seeking waiver on leveraging requirements and minimum loan amounts.

COLLEGE MEDIA DAY MEETING
MARCH 15
AGENDA

I. Invitations
A. Confirmations

II. Agenda
A. Press materials

III. Lunch

IV. East Room

- Mrs Clinton
- Direct Student Loan
- Eli Segal
- Secretary Reich
- Janet Reno
- World Wide Web -
- Panel Discussion
- President Clinton
2:30 - 3:00

Youth

200 total

what materials generated

Forum
media reports

FAX

Alliance for Redesigning Government

National Academy of Public Administration
1120 G Street, N.W., Suite 850
Washington, D.C. 20005-3801
(202) 347-3190, FAX (202) 347-3252

Subj: Federal Interagency Action Team Meeting Draft Synopsis (As of 3/7/95)

TO:			
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FROM: Mark Popovich
202-347-3190

Total pages: 11

Date: March 22, 1995

PARTNERSHIP FOR RESULTS -- THE OREGON OPTION

INTERGOVERNMENTAL INTERAGENCY ACTION TEAM MEETING
DRAFT SYNOPSIS
Tuesday, March 7, 1995

Alliance for Redesigning Government
Barbara Dyer and Mark Popovich
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Please Contact Mark Popovich With Any Proposed Changes

PARTICIPANTS:
Washington: Bev Godwin, Jonathan Breul, Lorraine Chang, David Garrison, Karl Koerper, Susan Young, Ann Segal, Ta Zitans, Michael Dalich, Sarah Ingersoll, Hazel Fiers, Linda Trageser, Jackie Wirth, Sigurd Nilsen, Paul Posner, John Gregrich, Richard Silva, Michael Reeder, Bruce McDowell, Margaret Dunkle, Joseph Firschein, Steve Henigsen, Jennifer Miller, Barbara Dyer, Mark Popovich

Oregon: Duncan Wyse, Marc Overbeck, Connie Revell, Deirdre Molander

Seattle: Wes Davis, Steve Henigson

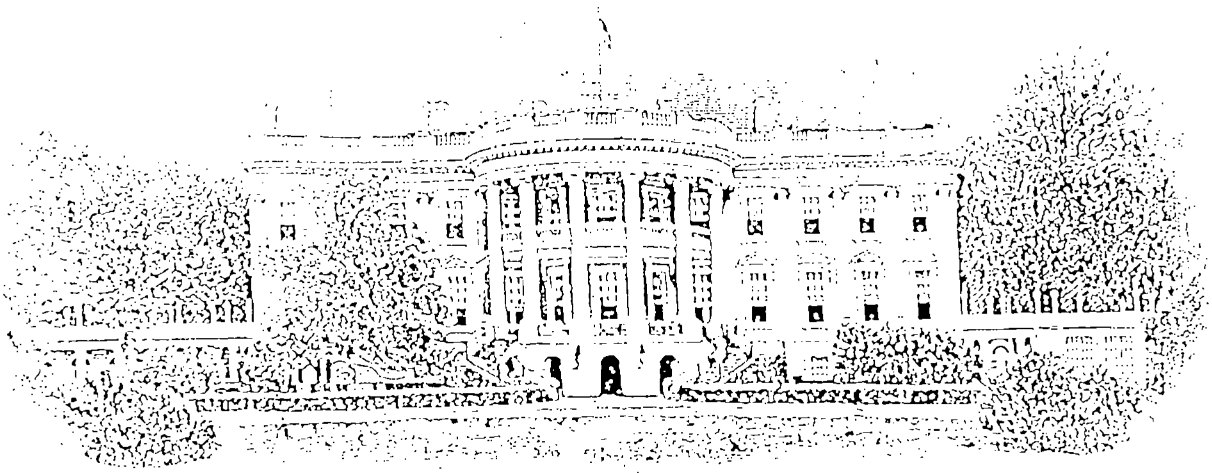
ACTION ITEMS:
- o Comments to Sarah Ingersoll, Justice, on possible Safe Communities Cluster, fax: 514-6382
- o Comments to Bev Godwin on performance partnerships summary of principles, ASAP, fax: 202-632-0390
- o Call Chris Berendes at NPR, 202-632-0150 ext 160 for individual assistance in connecting to and using Internet
- o Contact Margaret Dunkel, IEL, regarding the invitations for the Oregon field trip and the upcoming Exercise in Program Eligibility, phone: 202-822-8405

UPCOMING EVENTS:

Workforce Cluster in Washington	Early April, Probably 4/9-10
Doug Ross on Individual Empowerment Elements	3/21, 1:30-3:30pm, NPR Liaisons Meeting, White House Conference Center, Jackson Place**
IEL's Oregon Site Visit	4/19-22. Contact IEL for more information. Invite req.
IEL's Exercise in Program Eligibility	3/27-29th, Washington. Contact IEL with suggestions for invitations.
Rural Partnerships Meeting	3/29-31, Ramada Plaza Hotel, 10 Thomas Circle NW
Intergovernmental Interagency Action Team Meeting	4/4, 3:00pm Eastern, NPR Conference Room

** Contact Mary Mozingo at 632-0150 ext 116 to get on list for session.

The White House



DOMESTIC POLICY

FACSIMILE TRANSMISSION COVER SHEET

TO: Bob Koff

FAX NUMBER: 314-862-2003

TELEPHONE NUMBER:

FROM: Gaynor McCown

TELEPHONE NUMBER:

PAGES (INCLUDING COVER): 6

COMMENTS: Bob -

Please find the memo regarding state and local initiatives attached. The meeting scheduled for today has been postponed to Friday. I will give you a call later today or tomorrow morning. Sorry for the delaying getting this to you.

Gaynor

— In that context, GOALS 2000
— Family Support and Preservation Act
— Empowerment

Dilemma — — The folks that are out in the world are at a loss on how to coordinate the different entities and [illegible]

to get technical assistance from

— How does governance fit in here because that is the key to coordination?

— who has responsibility and accountability and also develop a strategy

→ RAPID RESPONSE ~~Teams~~
get one teams

— ~~Family~~ PRESERVATION ~~AND~~

opinions needed and then ones and rounds

Initially a meeting to hear What are the problems?

— Both political and substantive

— We need you and HHS

2nd meeting

— JUNE 1

~~How do we not~~ spend dollars
For things that the government should be doing anything.

MONDAY MORNING

— more

THE WHITE HOUSE
WASHINGTON

Help flesh out the issue of how we proceed w/ per. partnerships

- Of ones met one in the budget - can we find one/two local examples

- We can find one/two governors

THE WHITE HOUSE

WASHINGTON

Anna Danegger

FAX 628·4025

Please fax to her.

thanks!

DONE,

Bear

MAR 10 1995

THE FINANCE PROJECT

GAYNOR

March 10, 1995

Dear Colleague,

I am pleased to send you several recent papers produced by The Finance Project as a part of its Working Papers Series. These include:

Reform Options for the Intergovernmental Funding System: Decategorization Policy Issues by Sid Gardner

School Finance Litigation: A Review of Key Cases by Dore Van Slyke, Alexandra Tan, and Martin Orland, with assistance from Anna Danegger

Spending and Revenue for Children's Programs by Steven D. Gold and Deborah Ellwood

The Role of Finance Reform in Comprehensive Service Initiatives by Ira M. Cutler

Securing Equal Educational Opportunities: Past Trends and Coming Challenges by Martin E. Orland and Alexandra Tan

The Finance Project produces a variety of papers on topics related to financing for education and other children's services. Some are developed by project staff, others by outside researchers and analysts. Some provide background for our ongoing empirical studies and development activities. Others present conceptual frameworks and analyses of salient policy and programmatic issues. Many are works in progress that will be revised and updated as public events unfold and as new information becomes available. They reflect the views and interpretations of the authors. By making them available to a wider audience at this stage of development, our intent is to stimulate new thinking and induce a variety of public jurisdictions, private organizations, and individuals to examine the ideas and findings they present and use them to advance their own efforts to improve public financing strategies.

Additional copies of these and other papers in the Working Papers Series are available from The Finance Project.

With best regards,

Cheryl D. Hayes

Cheryl D. Hayes

Cheryl D. Hayes
Executive Director

1341 G Street, NW
Washington, DC 20005
(202) 628-4200
FAX (202) 628-4205

Alice Rivlin	
Elaine Kamark	
Mike Smith	DoED
George Latimer	HUD
Shea Bilchik	Justice
Peter Edelman	HHS
Beverly Godwin	
Paul Weinstein	
Mickey Levitan	
Gaynor McCown	
Jeremy Ben-Ami	

- Before we start signing MOU's we need to ensure that there is some kind of "shared vision."

- When they come to us we will be in a better position to respond.

- Are we also interested in work with city and county governments?

- It will grow from there (city -> state)

- Who will be the group to follow-up?

- Another way of looking at it: what can we provide for them? What can they provide for us?

- NGA statement of agreement -> Children's Summit

- This needs to be integrated w/ the waiver process?

- George Latimer's point is a good reason to focus on S. 88 -> if we focus on legislation then people see it as something that will stick. Otherwise, it becomes lots of little initiatives -- fragmented.

- How are Block GRANTS DIFFERENT FROM PERFORMANCE PARTNERSHIPS

- As a major part of the approach => This would allow "service integration" at the local level

- Do we want the Hatfield Bill to apply to states?

- The strongest part of Oregon is tracking benchmarks

- Do we have things that we could point to?

- How proactive do we want to be?
- Who will be the group to follow-up?
-

- Do we want to use the Danforth Foundation?

-

*Where does the process of "service integration" fit into this?
Could this provide a context?

Two ways to approach:

1. Performance Partnerships
2. Hatfield - Should we get behind this? A "bi-partisan" new approach AND a way of reaching out to communities and states?

PERFORMANCE PARTNERSHIPS

SUMMARY AND GUIDING PRINCIPLES

NATIONAL PERFORMANCE REVIEW

AL GORE
Vice President of the United States

PROVIDED BY THE
NPR PHASE II FEDERALISM TEAM

WORKING DRAFT
FEBRUARY 1995

PERFORMANCE PARTNERSHIPS

SUMMARY

WHAT IS A PERFORMANCE PARTNERSHIP?

- CONSOLIDATED PROGRAMS WITH
  - -- INCREASED FLEXIBILITY
  - -- ACCOUNTABILITY FOR PERFORMANCE

WHERE DO THEY MAKE SENSE?

- IF PROGRAMS ARE DELIVERED AT STATE AND LOCAL LEVELS,
- THERE IS SHARED AGREEMENT ON GOALS AND OBJECTIVES, AND
- YOU CAN MEASURE RESULTS.

HOW ARE THEY DIFFERENT FROM BLOCK GRANTS?

- OUTCOMES (NOT PROCESS) ARE THE PRINCIPAL MEASURE OF SUCCESS, AND
- FUNDS AND FLEXIBILITY ARE TIED TO IMPROVED PERFORMANCE

HOW ARE THEY "PARTNERSHIPS"?

- FEDERAL, STATE, AND LOCAL GOVERNMENTS AND PROVIDERS JOINTLY DESIGN THE PROGRAM AND MEASURE PROGRAM RESULTS
- PARTNERS WORK TOGETHER TO REMOVE BARRIERS TO SUCCESS

PERFORMANCE PARTNERSHIPS
Guiding Principles

Current Federal grant system.

A great deal of the current grant system has broken down in a tangle of good intentions gone awry. There are too many funding categories, suffocating regulations and paperwork, misdirected emphasis on remediating rather than preventing problems, and no clear focus on measurable outcomes. The system stifles initiative and squanders resources without achieving sufficient results. Performance partnerships offer improvements to the current system.

What is a performance partnership?

Performance partnerships provide increased flexibility on how a program is run in exchange for increased accountability for results.

- Increased flexibility includes:
  - -- consolidated funding streams
  - -- elimination of micro-management,
  - -- devolved decision-making (national goals and objectives, with much more flexibility for State and local partners to determine HOW these are achieved), and
  - -- reduced wasteful paperwork.
- Increased accountability for results means the partners will:
  - -- begin to treat outcomes and outputs as the basic measure of success (e.g., teenage pregnancy rate rather than number of visits to a clinic), and
  - -- create funding and other incentives to reward desirable results and performance towards results.

Where do performance partnerships make sense?

Performance partnerships work best:

- When the Federal Government intends to deliver services at State and local levels,
- Where there is shared agreement among Federal, State and local partners about national goals and objectives, and
- Where progress toward the goals and objectives can be measured.

Checklist of Guiding Principles for Designing a Performance Partnership

A number of key characteristics should be considered in designing and implementing performance partnerships:

1. Program consolidations
2. Partnership
3. Increased Flexibility
4. Improved Accountability
5. Measuring Performance
6. Performance Incentives
7. Shift in the Locus of Decision-making
8. Administrative Simplification
9. Administrative Savings
10. Implementation
11. Entitlement Programs

The checklist which follows contains principles which build upon the description of the Administration's six proposed "performance partnerships" in the President's FY 1996 Budget (see pages 152-154). The guiding principles should be regarded as ***"rebuttable presumptions":***

(a) In any policy arena in which there is a strong national interest and a history of Federal grants and other assistance to State and local governments, agencies should give strong consideration to developing one or more performance partnerships.

(b) If a proposed performance partnership is not consistent with a particular principle, there should be a compelling argument about how the program is otherwise addressing local needs, stops micromanagement, and holds its partners accountable for results.

1. Program consolidations

- Proposals should restructure current grant program authorizations to consolidate programs and/or funding streams and eliminate overlapping authorities:
  - -- Every effort should be made to merge funding streams which now force recipients to wastefully isolate administration and delivery of one program from another to avoid being penalized by auditors.

2. Partnership

- Federal, State and local partners should jointly design the partnership and the strategies to implement it.
- Performance partnerships should accommodate different program strategies with different State and local partners.

3. Increased Flexibility

- Performance partnerships should:
  - -- Promote multiple approaches to meeting national objectives,
  - -- Allow federally-funded activities to be fully integrated with State,

local, and provider activities, and

- -- Allow flexibility so that State and local institutional forces and incentives achieve the desired results.

- If State plans are necessary, multiple "State Plan" requirements should be replaced with one "community-based strategic plan." Such a plan would outline basic strategies and tactics, and accommodate much more diversity from community-to-community and state-to-state than existing approaches.

- Partnerships should:

  - -- Minimize "required" service requirements, and

  - -- Provide multi-year funding.

4. Improved Accountability

- Federal agencies and State or local partners should develop, communicate, and monitor measurable program goals and report progress toward achieving them:

  - -- Think in terms of shared accountability.

- Performance partnerships should focus on *outputs* and *outcomes* (real results) rather than detailed assessment of the inputs and process used by States and localities:

  - -- An emphasis on results means, for example, concentrating on getting cleaner air (not the existence of State environmental regulations) or whether educational goals are being achieved (not the level of school expenditures).

- Notwithstanding increased flexibility, performance partnerships will maintain Constitutional and critical, national public policy requirements:

  - -- Non-discrimination requirements, for example, will apply.

5. Measuring Performance

- Performance partnerships should be structured, managed, and evaluated on the basis of *results* (i.e., progress in terms of agreed upon measures of performance).

- Performance measures will typically include a mix of outcome and output measures, including both measures of progress toward national goals and measures of important negative consequences that are likely to result from program activities.

- Partnerships should focus on *outcomes* (not *process*) as the principal criteria by which to measure success.

- Authorizing legislation should include a statement of:

  -- "National goals and objectives" that the partnership seeks to help achieve, and

  For example: "parental responsibility."

  -- Types of "performance information" that would indicate what types of information would indicate progress toward the national goals and objectives.

  For example: "paternities established"

- The Federal agency should be authorized to develop national goals and objectives where the authorizing legislation does not specify them.

  For example: "The Secretary shall, in conjunction with the States, local governments, providers and consumers, develop national goals and objectives."

- "Performance measures" and performance targets should *not* be incorporated in authorizing legislation.

  For example: "The Secretary shall, in conjunction with States, local governments, providers and consumers, develop and update measures for determining State or local performance in achieving progress toward the national goals and objectives."

Accordingly, performance measures and targets should be:

-- Mutually developed by the partners, or

-- In the case of certain core indicators, developed by the Federal Government in consultation with grantees, and supplemented with indicators mutually agreed to by the grantees.

-- Refined over time in consultation with the grantees.

Performance measures require specification of at least the following:

(1) Type of performance information.

(2) Data source (or sources).

(3) Acceptable levels of precision and accuracy.

(4) Domains of estimations (e.g., States, counties, etc.)

(5) Frequency of data collection.

(6) Time period covered.

For example: for "paternities established"

(1.1) Percentage of new welfare cases for which paternities have been established, for each fiscal year cohort of new welfare recipients.

(1.2) Percentage of the total welfare caseload for which paternities have been established, as of the close of each fiscal year.

(2) Selected welfare system case records and information obtained through external quality control review.

(3) Total estimation error not to exceed 7% at the county level and/or 1% at the State level.

(4) The sample design must support precision and accuracy requirements for State (county) level estimates or for the population generally (e.g., the entire sample may be allocated across the State, "n" cases allocated per county, or even "n" cases per 1,000 per county).

(5) Annually.

(6) The last fiscal year.

- Performance agreements:

-- Federal agencies should develop individual performance agreements with each State/locality receiving funds.

For example: "The Secretary shall, in conjunction with the States, local governments, providers and consumers, develop individual performance agreements which specify the program goals and objectives, program performance measures, performance targets, and the timeframes for achieving the performance targets."

- Assessing progress:

-- The authorizing legislation should include a requirement that the Federal agency work with the partners to develop a system for assessing the extent of progress toward national objectives.

For example: "The Secretary shall, in conjunction with the States, local governments, providers and consumers, develop a system for assessing the extent of progress toward the national objectives."

-- At least annually, the partners should assess the level of performance achieved, the extent to which performance meets or exceeds agreed-on performance targets, and the extent to which performance has changed over time. These reports should acknowledge the influence of important external factors that may have affected the performance levels achieved.

-- From time to time, annual performance reports should be supplemented by program evaluations that estimate the net program impacts caused by the program. These program evaluations would use research designs to estimate the difference that the program makes (i.e., the difference between (a) the actual performance levels achieved, and (b) the performance levels that would have been achieved in the absence of the program).

- Data collection:

  -- The partners will have to identify or develop data systems to define and assess "results" and "improvement in results."

  For example: "The Secretary is authorized to withhold up to 5 percent of the amount appropriated to the program to support the development and updating of data systems tied closely to the national goals; the development of performance agreements with States; and data quality assurance and data quality improvement; and research and development of performance measurement methodology."

  -- Partners should consider whether and how to get data that is generalizable, and consistent among and within States overtime.

- Refining the measures over time:

  -- It is expected that the performance measurement process and indicators will evolve over time, as Federal agencies and grantees develop greater experience with this approach.

6. Performance Incentives

- Agencies should consider whether funds should be allocated in part on performance (but other factors such as need may also be determinants, including population, poverty, disease incidence, morbidity, and mortality, as appropriate).

- Partners should be recognized and rewarded for success -- both high performance and improved performance.

- Recipients should be rewarded for achieving ambitious, rather than readily-attainable, performance targets.

- Some portion of the funding should be based on actual performance:

  -- Some portion of funding should be available to the Federal agency as an incentive for States and localities that make improvement.

  For example: "The Secretary is authorized to reserve up to 10 percent of the funds to be used for performance incentive awards for recipients making process toward meeting national goals."

  -- "Up to" is important, since it will first be necessary to get a sensible measurement system in place, before attempting to award performance incentives.

  -- Rewards should not be directed toward only "exceptional" performance, but allow the Secretary to reward high or improved performance (i.e., "progress toward achieving national goals").

- High-performing States and localities should be rewarded with additional flexibility or reduced matching requirements.

- Similarly, disincentives should include reduced flexibility:

  -- A requirement to shift funds into practices successfully used by high performing States and localities, or

  -- Requirements for additional commitments of State or local resources, or

  -- Reduction or termination of Federal funding.

- Partners should avoid punishing innovation and experimentation:

  -- Keep in mind: no one is accountable for results *now* under the current system.

- Since there is shared accountability for results, Federal agencies should also respond to problems by providing technical assistance about promising practices:

  For example: "The Secretary shall provide technical assistance to the States to help them expand and improve ...."

- States and localities should be held harmless for cases where outcomes are not achieved despite the use of best practices (given the current state of knowledge).

7. Shift in the Locus of Decision-making

- The partners should decide largely on the *"What"* and leave most of the *"How"* to States and localities.

- Performance partnerships should seek to empower communities to make their own decisions about how to address their needs, and to be held accountable for results.

- Front-line, local-level providers should have greater flexibility and responsibility for service design, delivery, and results.

- Partnerships should permit customers and beneficiaries to shape programs to better match their individual needs -- by giving them voice, choice, and the means to integrate services from multiple providers.

- Recipient jurisdictions should have flexibility to set local benchmarks that are consistent with national program goals.

8. Administrative Simplification

- Partners will seek to reduce barriers to success.

- Partnerships should resemble "performance contracts" (i.e., contract for measurable results) rather than traditional cost-reimbursement, "level-of-effort" grants.

- Performance partnerships should reduce Federal regulation of inputs, and avoid micro-management, and wasteful paperwork:

  -- Rigid and costly program restrictions should be eliminated.

- Procedural, detailed application, financial management, auditing and expenditure reporting requirements should be eliminated or simplified to permit comprehensive service delivery:

  -- The focus should be "Is the community achieving measurable results that indicate progress toward national goals?" -- rather than "Were the dollars spent on the identified problem?"

- Federal agencies should, to the extent feasible, establish or negotiate performance targets, rather than specify the manner of compliance that States or localities must adopt.

- Reporting and monitoring should focus on performance (outcomes and outputs that indicated progress toward strategic goals) rather than inputs.

9. Administrative Savings

- Administrative savings should be realized through consolidation and program and administrative simplification:

- Consolidated planning requirements, for example, should enable more integrated services with less overhead.

10. Implementation

- Proposals should consider:
  - Phased-in implementation,
  - Initially, shifting toward performance partnerships with self-selected or "volunteer" States/local partners that are ready.
- Partnership proposals should accommodate different degrees of devolution between Federal, and various State and local governments.

11. Entitlement Programs

- Performance partnerships for entitlement programs might:
  - Initially allocate funds to States to match what they currently receive,
  - Adjust over time for growth of poverty population and inflation,
  - Authorize the Secretary to provide extra funds to States during economic downturns,
  - As an incentive (since funding levels are fixed), permit high-performing States to re-direct their matching funds.
- Eligibility may need to be simplified, for example, to transform public assistance offices from bureaucratic eligibility offices into family support and job preparation centers linking a range of services.
- There may be a need to set specific common measures, but allow for flexibility for local circumstances:
  - Measures should be both population- and client-based.