

At Issue: Musings on Policy

Jerry Friedman

Dean Atchison once wrote that “the purpose of memos is seldom, if ever, to inform the reader. Rather, they are almost always intended to protect the writer.” I think the same could be true for much of the policy development activity that occurs in human services today. *At Issue* is why so much of our policy work is focused on federal rules compliance and program protection that we sometimes run the risk of overlooking our primary purpose of helping clients achieve better outcomes.

Over the past couple of years, the National Policy Council of the American Public Human Service Association (APHSA), which comprises state CEOs, has been working on a more proactive approach to identifying social issues, establishing policy priorities, and developing formal policy positions that will strategically guide us toward achieving our program goals. Effective legislative relations are a core competency of APHSA, and I often hear from our members that it is one of the functions that they value most about the association. However, moving from a primary focus that includes legislative tracking, analysis, informing, and commenting to actually proposing and promoting new legislation requires different tools and skill sets. As we move toward this activity in preparation for a new administration in Washington, we have spent considerable staff time aligning our resources and identifying those elements that contribute to more effective public policy development. I would like to share some of our observations.

First, it is important to make the distinction between compliance and policy development. In either case, policy must be grounded in operational reality. Ultimately, policy is what you do, not what you write. Therefore, policy should be an operational tool, and effective communication between policy and practice functions is essential to good programming. This implies a participatory process involving all parties affected by the change. Based on my observations, too often critical functions such as training, evaluation, finance, and information system changes are an afterthought—not the primary considerations—to a good policy idea. I would contend that if you can’t teach it, account for it, measure it, or automate it, policy expectations are unlikely to be met.

Second, policy should be data driven to the extent it is possible, both in terms of making the case for change and in evaluating effectiveness. A former policy colleague of mine used to declare “In god we trust, but for all else give me data.” Recent events in TANF and child welfare have demonstrated the perils of relying primarily on federal data reporting to define program success. Rather, human service planners should identify those data elements essential to measuring client outcomes and then extract or add the data necessary for reporting compliance. We cannot have the federal reporting requirement tail wagging the program outcome dog.

Third, policy changes must be clearly understood by the end users. We must declare what problem we are trying to solve and try to fine-tune our product through field testing. The large volume of policy transmittals and lack of clear instructions, especially complex eligibility manuals, have extracted a huge toll in resource deployment, intake accuracy, program credibility, and staff morale. Ultimately, policy should be a tool for workers, and therefore, simple English works fine. It is also important that policy remains contemporary and that obsolete and obscure rules be purged. I worked in a state that catalogued over 35,000 separate program rules. The volume alone made it impossible for workers to keep track of policy or for computer professionals to effectively automate them. Like a garden, policy must be periodically weeded and pruned.

If possible, policy development should also consider a means to mid-course correction and adjustment based on program experience rather than theory. This is needed to balance a tendency toward rigidity and to create a program safety valve against unanticipated consequences. We do not need to reinvent the wheel. Capturing best practice and lessons learned is efficient and mitigates risk. One of the misnomers about welfare reform is that it started with legislation. It didn’t. It evolved from the wisdom and experience gained from over 40 waivers where states felt that they could offer a better and more effective solution. These “laboratories of democracy” had a profound impact on social policy and contain an important lesson on the virtues of policy flexibility and empowerment.

There is one other policy consideration that is paramount—we must always focus on our clients. Behind all of the rules, regulations, manuals, and forms is a real person who needs help, guidance, and support. We can never lose sight of our central purpose or why we chose to work in human services in the first place. I really look forward to working with APHSA’s revitalized Policy Council as it pursues a policy development course that is pro-active, analytical, politically astute, and empowers public human service agencies to do the right thing the right way.

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