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INTERLOCAL COOPERATION

IN THE

DELIVERY OF SERVICES

BY

ROBERT E. COSTELLO

A THESIS PROJECT SUBMITTED IN PARTIAL FULFILLMENT

OF THE

REQUIREMENTS FOR THE DEGREE

OF

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OF

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ABSTRACT

Interlocal cooperation in the delivery of services is the subject of this thesis project. The study surveys the types of cooperation communities can engage in. It also examines how three communities cooperate in the provision of police and public works services.

Interlocal cooperation can be defined as collaborative efforts undertaken by two or more communities. In this study, cooperation is looked at in terms of the provision of services. Such cooperation can be formal or informal, single function or multi-function, and supplementary or complete. In any case, it is seen as a means for improving the delivery of services.

Local services are financed through property taxes. People, these days, are demanding cuts in their property taxes. At the same time, they continue to demand services. The pressure is on administrators to find ways to provide services more efficiently and effectively.

Administrative and organizational constraints hamper efforts to cooperate formally. The administrators of service systems often have the power to make verbal agreements among themselves. Such agreements are more amenable to the variety of administrative and organizational conditions which exist in a group of communities. As a result, it was

not shocking to find that cooperative efforts undertaken by the three communities examined are primarily informal. Informal cooperation has its place and communities should cooperate with one another in the delivery of services in whatever formal or informal manner their organizational and administrative situations necessitate.

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I. ALTERNATIVE METHODS OF INTERLOCAL COOPERATION

Interlocal cooperation in the delivery of services can be formal or informal, single function or multi-function partial or total, functionally oriented or geographically oriented, and dependent or independent. It can be called a council of government, a common council, a special district, a metropolitan commission or a collaborative. Or, it may just exist through verbal agreements or written contracts.

Formal systems are based on agreements, agreements made legal by legislation or contracts. Informal ones are based on verbal agreements. Some states have made formal agreements among communities possible through legislation. These agreements provide communities with a mechanism allowing them to jointly exercise powers in the delivery of services, formerly and solely the authority of local governments. They can be used to allow communities to jointly undertake functions and responsibilities which they already could (and did) individually. They can also be used to allow communities to collectively purchase supplies and facilities.

The advantge of formal rather than informal is that formal agreements are legally secured, a written contract obligates all parties to participation. This becomes

important when an organization is set up to coordinate and administer over a jointly needed service system. Each community has financial investments involved which they may wish to protect. Sustained cooperation is necessary in order to protect investments. Formal agreements, such as legislation and contracts, prevent communities from "pulling out" unexpectedly.

Generally, municipalities are restricted to formal contracts or informal agreements which are specifically stated in their charters, or implied in legislative acts and constitutional provisions. The powers of local government usually end at their boundaries. All states, however, do authorize both formal and informal interlocal agreements for some purposes. For example, they can authorize the collective purchase of computers, the provision of mass transit, operation of parks and the collection and disposal of solid waste.

In Pennsylvania, interlocal governments which formally collaborate in the operation of one or more functions (the delivery of one or more services) form "municipal authorities". They are allowable under a 1945 act, the Municipal Authority Act. This legislation gives powers to all types of local governments, acting alone or in cooperation with one another. The local municipalities must adopt an ordinance or resolution setting up the authority. The ordinance would be similar for all the communities involved. The Secretary of the Commonwealth

reviews the ordinances for conformance with legal requirements. Finally, a certificate of incorporation is issued creating the authority. Communities can later withdraw from joint authorities if the authorities have not incurred any debts. If the authority consents, other communities can become a part of them.

Local governments may or may not specify the authority's function. It can provide all the services or functions of local governments (except local administration) so long as it does not duplicate them. These restrictions are intended to ensure that policy-making remains a local function and that competition between local municipal services and the authority's areawide services does not occur. The authority can provide revenue producing services such as bridges, flood control projects, parking facilities and shopping centers. After its formation, the sponsoring communities can increase or decrease the number of functions of the authority.

The authorities have governing bodies which are selected by the local governments which create them. If two or more communities are involved, the authority's governing body must have at least one number from each sponsoring local government. Members of the governing body of the authority must be residents of the communities whose governments appointed them.

Pennsylvania's municipal authorities are dependent special district governments. They lack sufficient fiscal

independence and administrative autonomy to be independent.

Localities supply the authorities with most or all of their money. They have no "taking powers".

This is the situation with all dependent special district governments. Although in some instances they may have considerable fiscal and administrative independence, their financial arrangements are almost always subject to review and revision by the parent localities. In addition, approval of the special district's plans or actions is required by either the executive or legislative body of the parent governments. Officers of the special district government, usually, are appointed by the chief executive or governing body of the parent governments, or are actually comprised of officials from the parent governments.

The Census Bureau differentiates independent from dependent special districts by saying that independent special districts "exist as an organized entity" with "governmental characteristics" and "substantial autonomy". Independent special districts do have more control over their finances. They usually assess the communities within their jurisdiction for the services they provide, whereas dependent districts must accept what is appropriated to them. Agreements are formally secured by contracts. Independent special districts have their own bureaucracies and often have a board of directors or an executive council which determines policies. They are virtually autonomous units of government. They employ and dismiss personnel,

purchase equipment, and determine the quantity and quality of service(s) they will deliver and the procedures or methods they will use to deliver them. They can exist for a single purpose (the provision of one service to communities) or for multiple purposes (the provision of several services).

In Massachusetts, for example, the Metropolitan

District Commission (MDC) is an independent, multi-functional,

partial, functionally oriented, cooperative service system.

It is an independent special district service organization.

It is not subject to scrutinization by local governments.

It owns the resources from which it provides services (such as reservoirs for culinary water), and provides those services on a contract basis to individual communities. It provides a variety of services, such as water, sewerage, and parks and recreation. Its services are intended to supplement those systems already operated by local governments.

Some special district governments provide only supplementary services, such as the MDC. These organizations provide services over and above those already provided by local governments. The services they provide usually involve the meeting of multi-jurisdictional needs. For example, the MDC owns and operates a park system extending along the Charles River. This is a recreation service extending through many communities.

Councils of government (COG's) are another type of collective system based on interlocal cooperation. Local officials voluntarily come together in councils of governments to discuss problems. They lack operating and enforcement powers and, therefore, are often used in contradiction to their purpose. Proposals for cooperative activity are talked about until everyone is tired of them and they forget them. This type of status quo organization, although the discussions generated by it can be helpful, often hampers other attempts for both formal and informal cooperative agreements.

Local governments sometimes join together in common councils. These are merely councils of governments with a different name. They, like COG's, are formed to resolve conflicts about areawide issues. They are a mechanism for coping with alternatives, implications and choices.

However, common councils run into the same pitfalls. Like councils of governments they tend to be unresponsive to the general public. Their participants are from the bureaucracies of the local governments involved, thus twice removed from the general public. In addition, they tend to focus on physical development.

There is potential for using councils of governments and common councils for promoting interlocal cooperation and for being a policy-making body or an implementing organization for such agreements. Participating representatives could be elected from the general public of the

communities involved instead of, or as well as, from the bureaucracies of the member governments. With representation of the affected public, policy decisions relating to the public interests involved could be improved. In addition, a more diverse spectrum of issues might be raised, such as those relating to social problems. The councils must recognize that poverty, deprivation and discrimination in one section of a region have consequences to the entire region. The councils might then function as they were designed to, an organization to assist and advise individual local policy-makers regarding policies about areawide issues. They might then promote interjurisdictional agreements for cooperation which reflect the interests and needs of the areawide community.

County and township governments are two other mechanisms for fostering interlocal cooperation. County governments exist everywhere while townships exist in a dozen or so states. There are both active county governments, which deliver services, and county governments which exist only in name. The majority of active county governments are outside of New England and are most active where unincorporated areas exist, such as in the Midwest, the South and some areas of the West Coast. Townships exist primarily in the Northeast and the Midwest. However, in the Midwest counties are taking over most of the functions which townships used to be responsible for. The most active townships exist in Long Island and Upstate New York.

Both these governmental units already exist in many areas and could be activated for the purpose of fostering interlocal cooperation. There are shortcomings to this idea, however. Their jurisdictional boundaries are fixed and have been for some time. Patterns of development (and therefore the locations and patterns of activity) of the decades since they were instituted do not respect their boundaries. Therefore, the needs and problems of people arising from their location and activity do not contain themselves within individual counties and townships. And even if several counties were to get together, the problems might affect merely a portion of the communities in each and involvement of the remainder of the communities would be wasteful and would decrease any economies which might have accrued from collective action. Townships are smaller units but problems may involve communities of two or three of them leading to the same results.

Another formal arrangement of interlocal cooperation involves metropolitan governments. These can be called conference, councils, commissions, and associations.

However, they are merely cooperative governments formed by bringing together one or more large cities and some or all of the suburban communities (and/or counties) about them in an attempt to more efficiently and effectively meet their collective needs and problems. They can take the form of councils of governments, common councils, special districts, or even collaboratives. Metropolitan governments

serve the same purposes as other interlocal cooperative organizations—meeting areawide needs, solving multi-jurisdictional problems. The only difference is that the focus is on metropolitan regions instead of on a collection of small and similar communities. The relationship of a city to its neighboring communities tends to be different than the relationships among small communities. Interdependence is different. In a metropolitan area, interdependence is between the city and each individual community; whereas, in an area of small communities, interpendence is each between each other. Therefore, systems of metropolitan cooperation must be distinguished from non-metropolitan ones.

Many communities participate in mechanisms formalizing cooperation. However, the Advisory Commission on Intergovernmental Relations has reported that it is not uncommon to find administrators of service systems in communities making informal agreements with one another. Many communities realize that there will be times when their service systems alone will not be able to cope with a problem or meet a need. As a result, they allow their administrators discretion in making agreements. The administrators know the limitations of their service systems. They know what type of cooperative ventures they can manage. They also know what types they will need in the future. It is therefore delegated to them to decide

what, how and when to jointly undertake functions or to provide or accept services from one another.

Many communities see informal cooperation as an alternative to the establishment of and participation in formal organizations. It does require more effort on the part of administrators to initiate cooperation because there is no forum which would facilitate it, and, there is no formal structure to cooperation which takes place informally. Informal agreements are based on mutual trust and respect among administrators. With no legal contract there is potential for abuse. The Advisory Commission on Intergovernmental Relations has found, however, that communities are willing to take the risks to avoid the "red tape" involved with formal systems. Informal cooperation allows agreements to be flexible enough to meet the diversity of problems which confront administrators, and to meet them quickly.

Local communities are both production and consumption units. However, because of problems inherent in both activities, communities must cooperate with each other. Whether cooperation is formal or informal, three issues become critical to its success. They are politics, economics and administration. The three are reviewed in the following section.

II. POLITICAL, ECONOMIC AND ADMINISTRATIVE ISSUES INVOLVED IN INTERLOCAL COOPERATION

Local governments could be considered basic building blocks in solving areawide problems. Communities are not isolated from one another. There are issues dealing with the delivery of services which do cut across local boundaries. These issues must be dealt with, and dealt with on a cooperative basis. Cooperative actions, therefore, can improve the capability of local governments to serve people.

Political issues surface when cooperative service delivery systems are mentioned. One of the major ones is that of centralization versus decentralization. This issue itself is a complex amalgam of other issues such as equity, economic efficiency, citizen access and control, and local autonomy. In promoting cooperative service delivery systems we are promoting some degree of centralization.

The equity of regional service delivery systems is one of the things which is often questioned. Can such a system provide services impartially or fairly to all? Will some be favored and others forgotten? As the number of people being served increases, and as service delivery systems grow to meet their collective needs, can justice to done to individual needs or the needs of small groups within the region.

The question could be directed toward individual communities. Are separate local service systems equitable? One of the functions of the level of services a community provides is its wealth, or the wealth of its residents. Therefore, it follows that there is a tendency for wealthier communities to spend more on services than those who are not as financially secure.

Areawide delivery of services could increase equity within a region. It could do so by doubling as a mechanism for the redistribution of wealth. Communities who participate in cooperative arrangements usually do so for benefits. Wealthier communities could subsidize the extra services for poorer ones if three conditions existed. The wealthier communities desire a higher level of services than the poorer ones. Only one level of services are to be provided throughout the region. The poorer communities couldn't pay for more than a level which is significantly lower than that desired by the wealthy. They would probably do this, too, if the amount they were saving by being part of the cooperative system were greater than the subsidy they had to pay.

The economic efficiency of cooperative systems is another issue. Will such a system increase economic efficiency; or, will it, in fact, decrease efficiency because it increases the complexity of administrative interrelationships? The theory of economies of scale suggests that it

will increase economic efficiency; however, other
theories suggest that the new bureaucracy which is created,
will, in fact, decrease efficiency, reducing or eliminating
benefits from economies of scale. One such theory is from
the field of political science. It deals with administrative
spans of control. As an organization or administrative
unit becomes larger, hiatuses develop in the chain of
command. These gaps between superiors and subordinates
grow as an agency gets larger. As they do, administrative
effectiveness decreases, followed by similar losses in
efficiency. Filling in the gaps requires more people
which cost more money, thereby reducing further the benefits
derived from economies of scale.

Another issue at hand is that of citizen access and control. This issue deals with the proximity of the governmental unit (in this case the administration of one or more service systems) to the people. Basic to this issue is a dilemma of democracy: active participation versus the need to obtain a consensus. While enlightened and responsive governmental action can result from dialogues between people and officials, so too can chaos and often inaction. However, a close proximity of the people to governmental units which provide them with services can prevent and expose corruption, foster innovation (by facilitating the use of residents to assist staff), and allow for easy and timely feedback (and interaction in general).

The next issue is local autonomy. It is a sensitive issue in some parts of the country, especially New England. Local governments are a unit of the political system of this country through which people have come to trust that they can have an effective say in policymaking. Local governments provide a variety of services, and can provide various levels of services. Different communities have different value sets, different needs, different incomes. Decisions must be made within each community as to the appropriate or desirable level of services. These are policy decisions and are made by the people for whom the services are provided, the residents of each community. Since communities differ, the levels and combinations of services in each will differ somewhat. Thus, local governments are a workable unit through which people can participate to tailor services to their needs.

In larger cities neighborhood organizations are becoming mediums through which people exercise their policy-making rights. These organizations have become surrogates of the small community's political environment. As cities have grown in population, so has the need for their service delivery systems to grow. As the service systems have grown, so have the governments in general, in order to accommodate, coordinate and administer services. More people means that each individual, and their particular needs, is less important in decisions regarding combinations

and levels of services. Large numbers of people become so heterogeneous that the community's needs in terms of services become amorphous. This, and the increasing size of the bureaucracy in general, give a life to the bureaucracy all its own. Policy decisions are virtually irrelevant with respect to small communities of people. Neighborhood organizations, as smaller, somewhat more homogeneous groups of people are seen as a way to make policy decisions relevant and to give municipal service systems a definable unit to which to tailor service delivery.

The Advisory Commission on Intergovernmental Relations has given a word of caution to localities considering consolidation or centralization of functions. It sums up the major concerns of this issue.

Every Unit of government should be responsible for a sufficient number of functions so that its governing processes involve a resolution of conflicting interest, with sufficient responsibility for balancing governmental needs and resources. Thus, in the durisdictional allocation of individual functions, there is an ever present danger of creating so many separate entities as to result in undemocratic, inequitable, and inadequate assignment of priorities. 5

The potential economies from centralization should be viewed carefully. Centralization itself has costs, and they tend to increase as centralization becomes extensive. Any function can be centralized. However, there is a point where economies gained through centralization begin to diminish and eventually become diseconomies. Even so, centralization does allow a grouping of activities,

bulk purchases of supplies, the sharing of capital equipment and facilities and other practices which can lower overall costs. Formal cooperative service delivery systems do involve centralization. However, the centralizing involved can vary widely in form and degree.

The desirability of cooperation varies from service to service. Werner Z. Hirsch has studied the local versus areawide service delivery problem. 6 He has developed some criteria to help in the decision as to whether or not communities would benefit from consolidating their service delivery systems into an areawide system. looked at these criteria for each function or service that a community provides. The criteria are: the minimization of spillovers, the maximization of scale economies, the sufficiency of geographical area, legal and administrative ability, functional sufficiency, controllability and accessibility by constituents, and maximization of citizen participation consistent with adequate performance. criteria give the necessary information for three critical considerations in organizing service delivery system -economics, administration and policy or politics.

The primary reason for considering reorganizing municipal service delivery systems is economics. In delivering local services, it is most desirable to minimize spillovers. A spillover is when residents of one community are impacted by any portion of the costs and/or benefits

resulting from services provided by a municipal government other than their own. Spillovers are bound to occur to some degree with any system; but, if "spill-ins" don't offset "spill-outs", welfare inequities result. It is therefore desirable to adjust service delivery systems in order to minimize spillovers.

For example, some roads which pass through a community are used by motorists other than residents of that community. Others are benefiting from road maintenance and repair services provided by the community and paid for by residents. There are spillovers. Many communities have similar roads, roads used by non-resident motorists. The number and length of these road vary. Welfare inequities exist. In order to compensate for the inequities the service delivery systems of each community are adjusted. roadways which are used by non-residents are designated county, state, interstate or US routes. They are then partially serviced by, or servicing by local highway departments is partially paid for by, that level of government which best represents the regional jurisdiction from which the non-resident motorists originate.

Maximization of scale economies and sufficency of the geographical area for supporting a service delivery system are the two other economic considerations. Both vary with the service being delivered. They involve the minimum and maximum capacities of the system(s) involved. There is a minimum and maximum geographic area within which any system can effectively and efficiently service. Geographic area sufficiency is closely tied to the scale of the service system. The scale at which the system is most efficient is determined by the laws of economies of scale and diminishing returns to scale. Therefore, the geographic area and the scale of the system are critical economic factors which should be considered in relation to one another.

There are two administrative criteria in the Hirsch model. They are: legal and administrative ability, and functional sufficiency. If an areawide service system is set up, it is better if its organization includes administration and its administrative body has legally delegated powers. Adminstration by local governments or a board of representatives from them is not good. A full time administrator and staff with the power to make adminstrative decisions is necessary for the system to operate as efficiently and as effectively as possible. If administration is done by a board or remotely from local governments, decisions will be slow, costing time and money. A board is useful for policy decisions but not for administrative decisions. If provisions are made for an administrator and staff but no legal powers are given to them, their decisions may not be carried out, their commands have no standing.

Policy or politics must also be considered; and, provisions for them must be incorporated in decisions about organization an areawide service delivery system. criteria which Hirsch has established for this purpose are: controllability and accessibility of contituents, and maximization of citizen participation. The affected public, those people for whom the system operates, should be involved in policy decisions, decisions such as what functions will be incorporated in the areawide system, what level of services will be offered, and what the priorities involved are. In a local community, the residents make these decisions through voting, and through their elected representatives. Their interests are represented when decisions are made regarding levels and/or combinations of services, or whether or not to continue operating the system. Citizens cannot be included in every decision (such as adminstrative decisions); however, meaningful citizen participation can be consistent with adequate performance of the system. In addition to involvement in policy-making, clients should be provided with means of communicating with the system. They should have an easy way to commend or criticize the services they receive. Feedback is essential for efficient and effective delivery of services and adequate mechanisms for communicating with the affected public are necessary in order to receive feedback.

Hirsch tested his criteria on eighteen traditional urban service functions. The following tables show the Table 1 summarizes the results of testing two results. criteria used to determine whether or not the services themselves favor local or areawide operation. The criteria considered were (1) the expectation of important scale economies and (2) the necessity of political proximity. It was found that important scale economies could be expected from eight of the eighteen services considered. The second criteria was the proximity of people to the bureaucracy of the individual service system and to the general governmental bodies which make policies for the individual systems. It was found that close proximity of the people to the government was particularly important with six services. There were eight services where political proximity was found to be of little consequence. With the remaining four services it was found that closeness of the people to the government was important sometimes and not other times.

Table 2 shows the results from testing two criteria used to determine who should finance what services (at what level of government should assessments be made and resources allocated). The criteria which were used were the expectation of benefit spill-overs from the services and the role of income redistribution in delivering services. Of the eighteen services considered, in only ten could major spillover benefits be expected; and, with only six

TABLE 1

URBAN GOVERNMENT SERVICES FAVORING
LOCAL vs. AREAWIDE OPERATION

Services	Important scale economies can be expected	Political prox- imity is consi- dered essential
Air pollution control	yes	no
Education	no	yes
Fire protection	no	yes
Hospitals	yes	no
Libraries	no	yes
Neighborhood parks & recreation	no	yes and no
Planning	yes	yes and no
Police	no	yes
Power	yes	no
Public health services	yes	no
Public housing	no	yes
Public welfare services	no	yes
Refuse collection	no	no
Sewage disposal	yes	no
Street maintenance	no	no
Transportation	yes	yes and no
Urban renewal	no	yes and no

SOURCE: National Tax Journal, "Urban Government Services", Werner Z. Hirsch, p. 333.

TABLE 2

URBAN GOVERNMENT SERVICES FAVORING LOCAL vs. AREAWIDE vs. NATIONWIDE FINANCING

	Major benefit spillovers can be expected	
Air pollution control	yes	no
Education	yes	yes
Fire protection	no	no
Hospitals	yes	yes
Libraries	no	no
Neighborhood parks & recreation	no	no
Planning	yes	no
Police	no	no
Power	no	no
Public health services	yes	yes
Public housing	yes	yes
Public welfare services	no	yes
Refuse collection	no	no
Sewage disposal	yes	no
Street maintenance	yes	no
Transportation	yes	no
Urban renewal	yes	no

SOURCE: National Tax Journal, "Urban Government Services", Werner Z. Hirsch, p. 336.

of the eighteen did income redistribution play an important role.

The Advisory Commission on Intergovernmental Relations has also studied interlocal cooperation. A part of their study, somewhat applicable, is the reasons communities gave for participating or not participating in regional councils (formal cooperative organizations). They asked a set of questions of local governments regarding why they participated in the formation of regional councils (see Table 3). The most important reason given by the communities sampled was to initiate cooperative approaches to solving regional problems. A second survey was done questioning why communities joined regional councils (see Table 4). A similar reason was most frequently given as most important. The second most important reason given for participating in regional councils (in both surveys) was that it was necessary to obtain Federal funds. A pattern of responses to these surveys and the two most important reasons for participating in regional councils was recognized by the Advisory Commission on Intergovernmental Relations. Larger communities over 100,000 population participated primarily for the second reason, to obtain Federal funds, while smaller ones did so mainly for the first reason, to reach solutions to local problems.

TABLE 3

REASONS GIVEN BY LOCAL GOVERNMENTS FOR FORMING REGIONAL COUNCILS: 1972

Reason	Number of Cities Reporting	Weighted Mean*	Number of Counties Reporting	Weighted Mean*
Total	987	• • • •	629	
Initiate cooperative approaches to solving general regional problems	829	1.5	531	1.5
Meet serious problem in a specific funcitonal area	228	2.4	153	2.5
Formalize previous informal cooperative arrangements	282	2.6	160	2.5
Offset some State action or threat of action	94	2.3	64	2.3
Compliance with planning requirements of Federal grant-in-aid programs	723	1.8	498	1.9
Compliance with areawide review requirements under Section 204 and Circular A-95	295	2.4	199	2.4

SOURCE: The Advisory Commission on Intergovernmental Relations. Regional Decision Making: New Strategies for Substate Districts. Table IV-2, page 117.

^{*}Respondents were asked to rank in order of importance the three major reasons that their regional council was formed (one being the most important reason, 2 and 3 being the next most important reasons.)

TABLE 4

REASONS GIVEN BY LOCAL GOVERNMENTS FOR JOINING REGIONAL COUNCILS: 1972

Reason	Number of Cities Reporting	Weighted Mean*	Number of Counties Reporting	Weighted Mean*
Total	810	• • • •	573	
Forum for discussion of regional problems	413	2.0	277	1.9
Contribute significantly to solution of areawide problems	564	1.8	407	1.8
Contribute significantly to solution of local problems	322	2.1	272	2.0
Improve cooperation between central city and suburbs	169	2.3	83	2.6
Necessary to obtain Federal funds	463	1.8	393	1.8
Necessary to obtain State funds	146	2.2	124	2.3
Concurrence with idea although doubtful of any real local benefits	104	2.4	73	2.4

SOURCE: The Advisory Commission on Intergovernmental Relations. Regional Decision Making: New Strategies for Substate Districts. Table IV-3, page 118.

^{*}Respondents were asked to rank in order of importance the three major reasons why their regional council was formed (one being the most important reason; 2 and 3 the next most important reasons).

Another survey was undertaken to determine why communities did not participate in regional councils (see Table 5). The most important reason given was that they are too often dominated by the largest communities. This reason was closely followed by three others: the planning and delivery of services were thought to be better performed at the local level; such organizations caused unnecessary administrative delays to Federal funding of local programs; and, the councils were seen as too costly to local taxpayers.

Several inferences might be gained from the responses to these three surveys. First, communities seem to be interested in working with one another. While Federal programs have induced larger communities into undertaking cooperative ventures when they might not have otherwise done so, smaller communities indicated that they were primarily motivated by a desire to solve their individual problems, as well as the problems of their neighbors. Second, the majority of communities see regional council as an arena or forum in which cooperation can be initiated.

Would these same communities who indicated that their primary reason for participating in a formal organization was to meet local needs on an areawide basis join together with one another if there were no formal mechanisms facilitating it? One of the surveys did indicate that

TABLE 5

REASONS FOR LOCAL NON-MEMBERSHIP IN REGIONAL COUNCILS: 1972

Reason	Number of Cities Reporting	Percent of Total	Number of Counties Reporting	Percent of total
Total	155	100	49	100
Weakened influence in State and Federal policy decisions	11	7	6	12
Innecessary red tape delaying Federal funding of local programs	32	21	16	33
Regional council would receive Federal and State funds otherwise allocated to local government	4	3	4	8
Planning and delivery of services could be performed better at local level than at regional level	33	21	23	47
Coo costly to taxpayers	30	19	15	31
Oomination by largest county or central city	36	23	20	41
Domination by many smaller governments	4	3	• • • •	• • • •
Other	56	36	22	45

SOURCE: The Advisory Commission in Intergovernmental Relations Regional Decision Making: New Strategies for Substate Districts. Table IV-1, page 116.

about twenty percent of the respondents were participating in formal cooperative arrangements before joining a regional council. It is unclear from the summary of the survey whether the twenty percent joined a regional council because they outgrew their informal arrangements or because they had other problems with the agreements which could only be corrected by formalizing them.

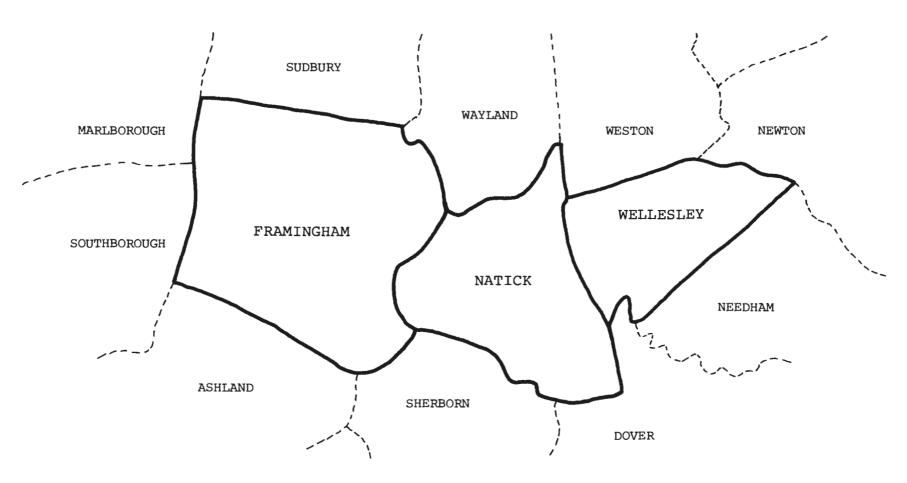
The following section is an examination of cooperation among three communities. They are all participating in informal agreements which they make as a need arises; and, they have indicated that they have had no problems resulting from the fact that they are not cooperating formally.

III. INTERLOCAL COOPERATION AND THE DELIVERY OF POLICE AND PUBLIC WORKS SERVICES IN THREE COMMUNITIES

The organization of service delivery systems in three communities are examined here to aid in the application of concepts of cooperation among them. communities are Framingham, Natick and Wellesley. contiguous communities in the South Middlesex area of Massachusetts. Land use in each is mixed. A major portion of it is single family sprawl-type development. However, Framingham in the recent past, and Natick most recently, have incurred sharp increases in the construction of multi-family dwellings. In addition to residential uses, a dense core of commercial and business establishments extends through Natick and Framingham (and less densely through Wellesley) along several state highways. tries are located in all three communities, also along major highways. The entire South Middlesex area is rapidly growing, and, Framingham, Natick, Wellesley and the communities about them have been identified as an SMSA by the Bureau of the Census for the 1980 census.

All three communities have a town meeting form of government with a board of selectmen who oversee government functions. In addition, Framingham has an executive administrator (town manager) in charge of day to day activities (since the board of selectmen meet only weekly).

FIGURE 1
MAP OF FRAMINGHAM, NATICK AND WELLESLEY



SOURCE: Metropolitan Area Planning Council. Map of the Metropolitan Area Planning District. April 1974.

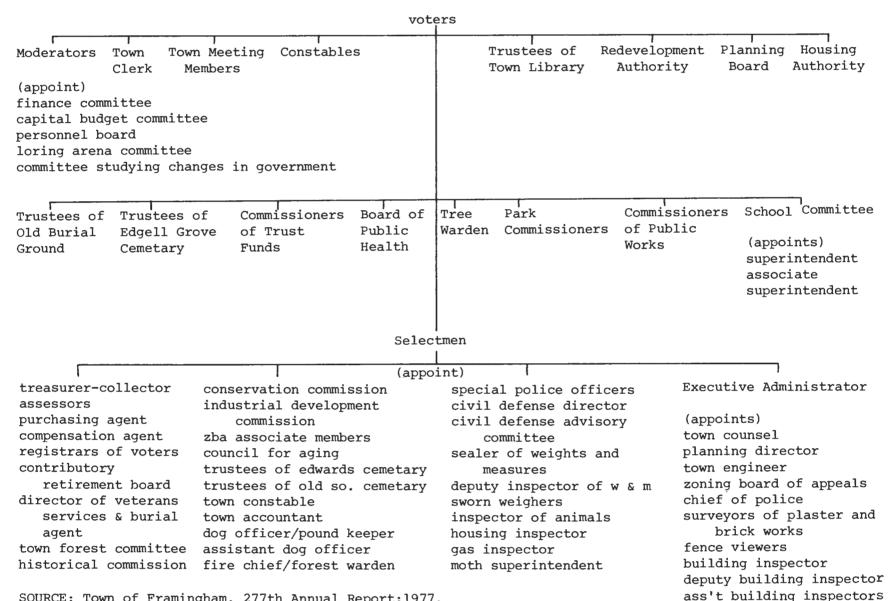
All departments (and therefore all services the town provides) are overseen by elected or appointed boards, commissions and committees. For example, the school committee oversees the operation of the school department, the board of public works oversees the activities of the department of public works (see Figures 2, 3 and 4).

both in population and in area. Approximately 68,000 people live in this 25-1/2 square mile community. There are 19 boards or commissions overseeing governmental activities amounting to the involvement of over 100 residents in the delivery of services. In addition, 211 residents participate in policy-making as town meeting representatives.

Natick is the second largest with more than 31,000 people living on 16 square miles of land. There are 46 boards or commissions involving more than 225 residents in governmental activities. In addition, there are 240 residents who are town meeting representatives partaking in policy-making. 8

Approximately 27,000 people live in Wellesley. 9
Wellesley covers about 10-1/4 square miles. 10 More than
137 people are involved in some 28 to 30 boards or commissions overseeing departmental operations. 11 There are
also 240 people representing the residents in policy-making at town meetings. 12

FIGURE 2 ORGANIZATION CHART OF THE FRAMINGHAM TOWN GOVERNMENT



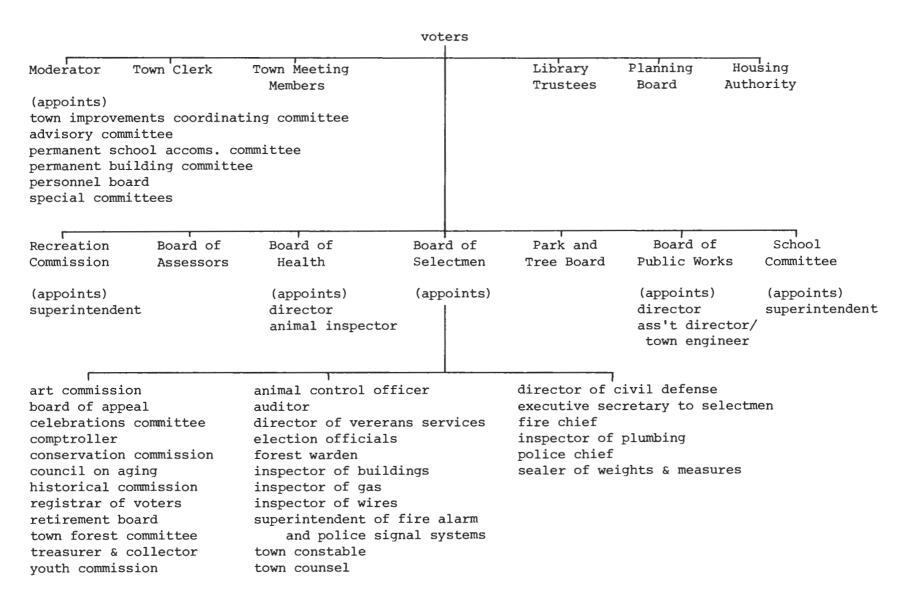
SOURCE: Town of Framingham. 277th Annual Report:1977.

FIGURE 3
ORGANIZATION CHART OF THE NATICK TOWN GOVERNMENT

	vot	cers			
Moderator Town Town Clerk Treasum (appoints) finance committee	Town Constables rer Collector	Planning Morse Board Institute Trustees	Housing Authority	Redevelop- ment Authority	Hospital Trustees
personnel board town meeting committees		(appoint) librarian	(appoints) executive director	(appoints) executive director	(appoint) hospital administr- ator
Town Meeting Recreation Members Commission			rd of lic Works	School Committee	
(appoints) superin- tendent	(appoints) (appoints)(apappraiser director		ector	(appoints) superintender business mana administrativ personnel	ager
board of registrars police chief pl		own counsel lanning director xecutive secretary			
contributory retirement board town comptroller	election personnel d building inspector sealer of weights & d	irector of civil defense og officer			
town forest committee historical commission youth & human resources commission council on aging		own report committee ther committees			

SOURCE: League of Women Voters. Know Natick. page 14.

FIGURE 4
ORGANIZATION CHART OF THE WELLESLEY TOWN GOVERNMENT

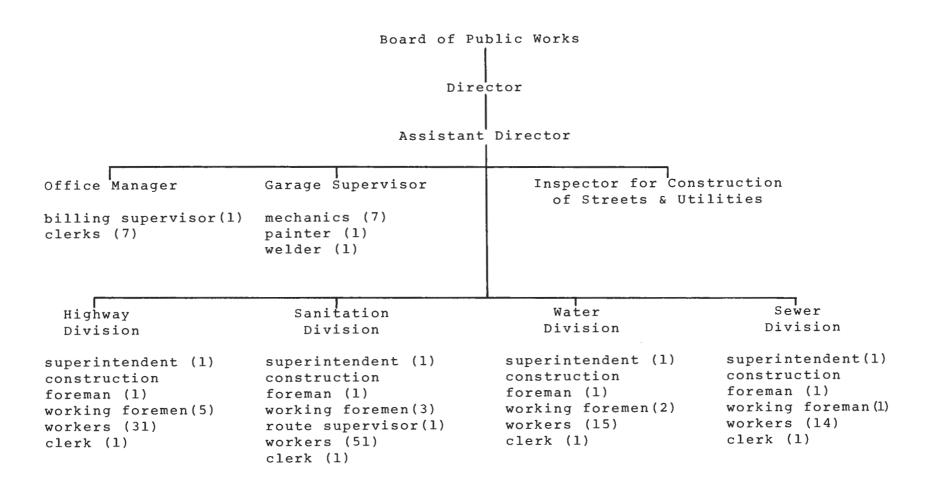


SOURCE: Town of Wellesley. 1978 Annual Report.

A closer examination of the organizations of service systems is necessary for evaluation and recommendation of potentials for interlocal cooperation. Two departments in each of the three communities were reviewed, the department of public works and the police department. The services provided by each department vary from community to community. In addition, their administrative organizations vary. No formal cooperation exists between the three communities with either of the two services. However, each of the two departments in each community does engage in informal agreements. The reason given by both departments in each community for having informal but not formal agreements is that there is no need for formal agreements at the present time, informal ones suffice. 13

Public works departments were examined for the services they offer and their organization. The public works department of Framingham is broken up into four divisions—highways, water, sewer and sanitation (see Figure 5). Each has working foremen and workers. Their activities are coordinated by a central administrator and an assistant administrator. There is an administrative staff as well as two auxiliary functions: utilities and streets construction inspector and auto service. Even though Framingham has organized four services within one department there is still a general administrator for each division (superintendents). The services may be benefiting by sharing clerical personnel and by increased coordination,

FIGURE 5
ORGANIZATION CHART OF THE FRAMINGHAM PUBLIC WORKS DEPARTMENT



SOURCE: Interview with Ralph Chipman, Department of Public Works, Framingham, Massachusetts, March 1979.

but the director, assistant director and office manager are three additional (highly paid) positions resulting from the grouping of the services.

Within the town's bureaucracy, the public works department relies on the work of the engineering department which is a separately functioning department. It also relies on the auxilliary services of the general government such as the treasurer, purchasing and personnel. Informal interaction between department heads occurs all the time. The public works department operates the municipal garage for maintenance and repair of all equipment and vehicles except the fire department's.

With the highway and water divisions, informal agreements exist. They are practical working agreements with the supervisors of the same departments of neighboring communities. For example, the water division has some agreements with Natick. Their pipes are connected with gates closing them off from each other most of the time. However, if water pressure gets too low on the border of one town, they call up the other and request that they open up the gates until the pressure builds back up.

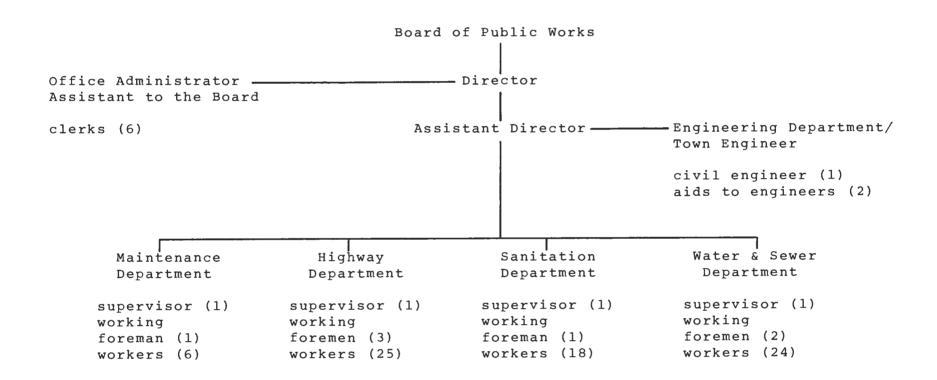
Agreements also exist with other towns regarding sewer and sanitation services. Ashland (and maybe Southboro in the near future), a small neighboring community pumps their sewage through Framingham's pipes to get to the MDC mains (which carry the sewage to a treatment facility on Deer Island). The public works department sends them a

bill (according to a contract) for the services. The sanitation division of the department operates an incinerator. The town of Ashland makes use of it. Billing is similar to that for sewer service. The town has formal agreements, contracts, with the MDC. With them it purchases most of the water residents use from the MDC. It supplements MDC water with its own wells.

As far as citizen access is concerned, when people have questions or problems about one of the public works services in Framingham, they call that division. Feedback is direct and easily facilitated. In Natick, feedback is channeled through the main office of the public works department. The office relays messages to the individual departments.

Natick's public works department also has four divisions (departments within the overall department), however it differs from Framingham's slightly (see Figure 6). There are highway and sanitation departments just as there are in Framingham. The water and sewer divisions are combined into one department and the maintenance garage is a separate department. There are no superintendents administering over the individual departments; there are expert/supervisors in charge of them. There are also working foremen and workers in each. A director and an assistant director oversee all activities. The assistant director has a dual function. He is also the chief engineer (expert/supervisor of the engineering department). The engineering

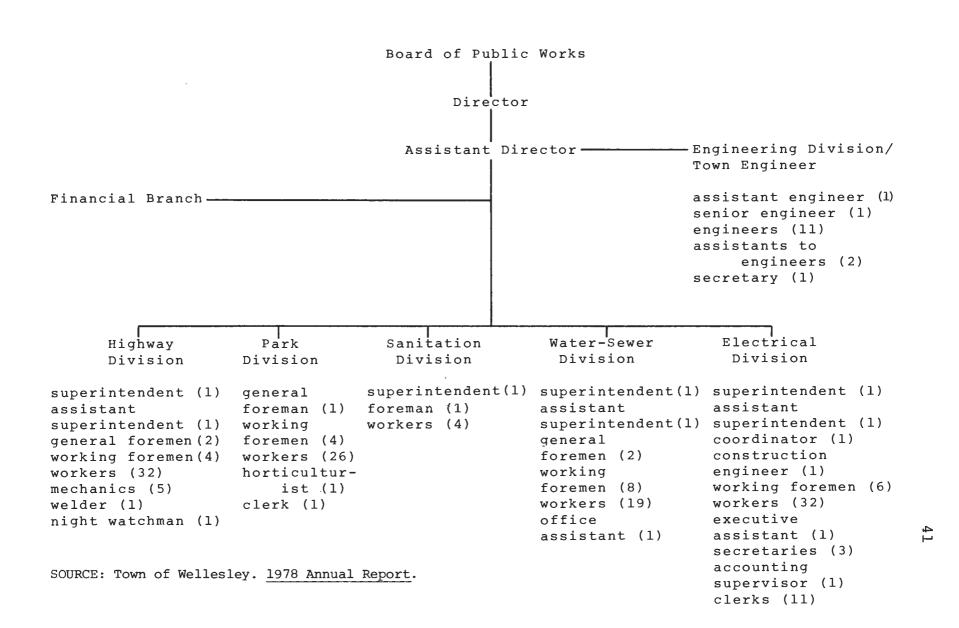
FIGURE 6
ORGANIZATION CHART OF THE NATICK PUBLIC WORKS DEPARTMENT



department is within the department of public works umbrella. There is also an office administrator who supervises a staff of clerks. The office work is for the overall department, individual departments within it and the public works board.

Natick has both formal and informal agreements for service cooperation with neighboring communities. informal water agreement with Framingham has been mentioned. A similar, but formal (written contract) agreement exists with Wellesley. There are also sewer agreements. agreements exist primarily because of natural barriers (streams, ledges, etc.) which make service provision by Natick's DPW too costly. Service is thereby provided by neighboring communities who bill the individuals receiving the service directly. In addition, Dover does not have a sewer system so individual hookups are allowed through individual agreements and through a trust. Agreements also exist with the state and with Dover to allow Natick (DPW) to search for water on property within their jurisdictions. Within Dover, Natick operates and maintains the pumps in exchange for some of the water. Natick pumps the rest into There is also informal mutual aid in the form of exchanges of supplies. For example, if Natick needs a part and Framingham has one, Natick buys it from them.

Wellesley's public works department differs from Framingham's and Natick's in that there are more divisions (see Figure 7). It has a highway and a sanitation division.



It also has a combined water-sewer division and the engineering function is a division of the department of public works, as they are in Natick. However, in addition to these divisions it also has a park division and an electrical division. The park division is responsible for the construction and maintenance of the town's parks. The electrical division generates and distributes electricity. It also installs, maintains and repairs traffic signals, fire alarms and police communications.

The department has a general director and an assistant director who is also the town engineer (like Natick). Like the public works departments in Natick and Framingham, Wellesley's has an administrative staff segment, office functions, which they call the financial branch. Each division within the department of public works has a superintendent with the exception of the park division which has a general foreman. Wellesley's department of public works seems to be similar to Framingham's in that there are many supervisors. The highway division, for example, has a superintendent, an assistant superintendent, two general foremen and four working foremen to coordinate the work of only thirty-nine workers.

The public works departments of the three towns vary in the services they deliver and in their organizational management. Table 6 is a comparison of the services each delivers. A formalized cooperative system of public works services with a centralized bureaucracy would require

TABLE 6

RESPONSIBILITY FOR DELIVERING CERTAIN SERVICES

. Service	Framingham	Natick	Wellesley DPW	
electric generation and distribution	EDIS	EDIS		
engineering	ENG	DPW	DPW	
fire alarms/police communications/				
traffic signals: installation	FD	FD	DPW	
and repair				
highways: construction	PRIV	PRIV	PRIV	
maintenance	DPW	DPW	DPW	
snowplowing	DPW	DPW	DPW	
cleaning	DPW	DPW	DPW	
municipal garage	DPW	DPW REC	DPW DPW	
park development and upkeep	REC			
sewerage	DPW/MDC	DPW/MDC	DPW/MDC	
solid waste: collection	DPW	DPW	DPW	
landfill		DPW		
incineration	DPW		PRIV	
recycling			DPW	
tree planting, maintenance and removal	FOR	FOR	DPW	
waterworks	MDC/DPW	DPW	DPW/MDC	
DPW Town Department	of Public Work	s		
EDIS Boston Edison C	ompany			
ENG Town Engineerin	g Department			
FD Town Fire Depar	tment			
FOR Town Forestry/T	ree Department			
	strict Commission	on		
PRIV Private Contrac				
REC Town Recreation	and Parks Depa:	rtment		

SOURCE: Compiled from town budgets and interviews, March, 1979.

extensive organizational development not only within the public works departments of the three towns but also within the entire governments. Individual services could be separated out, such as water, sewer, highways and sanitation, and centralized; however, problems with operational procedures and equipment do exist, especially with water, sewer and sanitation.

With water, Natick and Wellesley rely on wells while Framingham relies on MDC surface water. The equipment is different (values in the pipes operate differently). The region would have to be divided up into districts with certain specially trained personnel assigned to each district. Supervisors would then be required for coordinating activities of the personnel of each. Thus losing any advantages from centralization. The situation is similar with sewerage.

With sanitation, Framingham operates an incinerator while Natick a landfill; and Wellesley contracts a private incinerator and recycles recyclables. All three could use Framingham's incinerator; however, because of transportation costs it would probably be cheaper to divide the region into districts again using all three disposal methods. The end result would be a system operating in a similar fashion to the present one only administered by a larger, more centralized bureaucracy. Benefits would accrue to the towns from a formal centralized structure; however, it is more than likely that the costs will outweigh the benefits.

Each of the three communities has their own police departments. The departments are similar in that they each provide several basic services—public education about crime, police patrol, crime follow—up, overnight lock—up, traffic and parking control, and firearms control. The organizations examined here are those of Framingham and Natick. The organization chart of Wellesley's police department was unavailable.

Framingham's police department, like Natick's and Wellesley's is administered by a chief. The chief is not only an expert in the operations of the services delivered by the department but also the administrator. In

Framingham the chief has a staff for training, community services, and planning and research finance. Other administrative functions are organized in a separate bureau (one of three) under the executive officer, the bureau of services. This division includes administrative functions (personnel, records, etc.) safety (traffic control, parking, etc.) and inspections (personnel operations and equipment).

The two other divisions (bureaus) under the executive officer are operations and investigation. Operations is divided into shifts (three eight hour shifts). The functions of this division are communications and control. The investigation division is divided by function. It includes a detective and rape unit, a juvenile unit, photo

and identification unit, and a legal unit. Figure 8 shows the organization of the Framingham Police Department.

Natick's police department has a somewhat similar hierarchy (see Figure 9). There is a chief and an executive officer (who functions as prosecutor). There is an operations division and an investigative division. However, the staff and bureau of services divisions of the Framingham police department are combined under a single unit of administrative staff in Natick.

Informal agreements for mutual assistance do exist between Framingham, Natick, Wellesley and all neighboring communities. By law, policemen have jurisdiction within their communities, and one thousand rods over their borders into neighboring communities. All police departments usually respect the borders except when informal agreements for patrol within the one thousand rod zone and when aid requested. If aid is requested, temporary police powers within the community requesting the assistance are granted to officers requested to enter. If there is some emergency and officers of one community have not yet been requested by the other, the entering officers still could make arrests under citizen arrest laws.

An example of mutual assistance occurred one night when police were called to break up a brawl at a restaurant/bar. The establishment is in Framingham but only several hundred feet from the Natick border. The Framingham police were called. The Framingham dispatcher sent policement to the scene. The site, however, is in a

FIGURE 8
ORGANIZATION CHART OF THE FRAMINGHAM POLICE DEPARTMENT

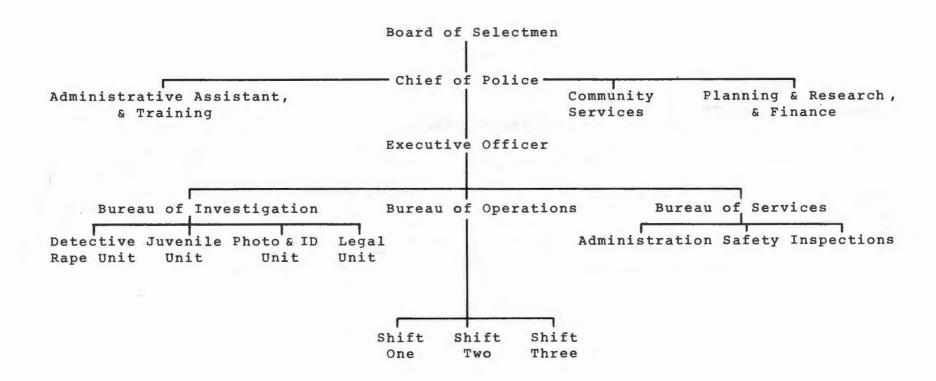
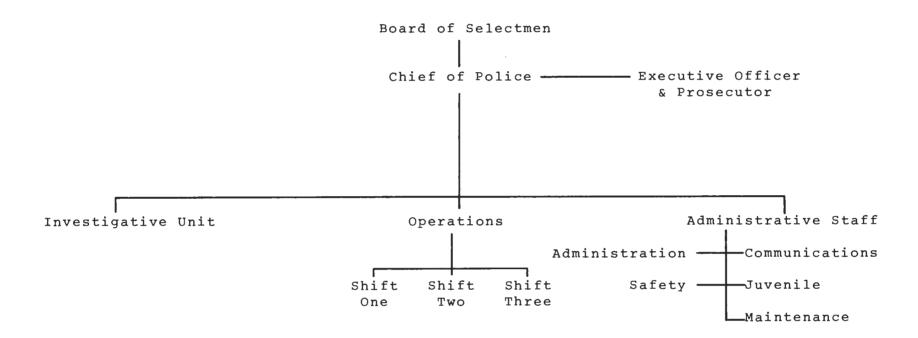


FIGURE 9
ORGANIZATION CHART OF THE NATICK POLICE DEPARTMENT



remote corner of the town and it takes more time than usual for policemen to respond. The Framingham dispatcher notified the Natick dispatcher that assistance was desired. The Natick dispatcher was already monitoring Framingham's communications (a regional communications system exists to improve mutual assistance response time) and sending patrolmen toward the scene. Natick police arrived first, broke up the brawl and made arrests. Upon arrival, Framingham police backed up the Natick police.

Interlocal cooperation with regards to police services also exist between Natick and Framingham in the form of training (mutual practices and drills). addition, ideas and information (dealing with administration and operations) are shared among all communities through both informal and formal mechanisms. For example, the Natick police department recently contracted cohorts in the towns of Sanwich and Wayland regarding grant writing and application procedures (these towns recently received money to purchase motorcycle and a videotape machine). Formal mechanisms such as the state organizations of safety officers and drug enforcement officers, and police chief associations facilitate the exchange of information and ideas. Some police departments also exchange personnel (temporarily) for undercover investigations. Local police also assist and receive assistance from state police. Local police back up state police on calls and the state police in turn assist local police with investigations and chemical analyses.

An institutional structure could be a desirable forum for facilitating and generating discussion. The police departments have organizations for bringing together individuals involved in similar functions among them for the exchange of ideas. For example, there is a state organization of safety officers, an organization of drug enforcement officers and a police chiefs association. Their organizations provide a common meeting place for discussing mutual problems and for the exchange of possible solutions.

A formal collaborative effort was attempted on the county level. "It started out big but fissled out." 14 Suffolk County is attempting to initiate a formal information exchange. Instead of bringing individuals together it will require monthly reports and redistribute them to each department within the county. This will provide a regular exchange of information and the organizations will facilitate face to face interaction. The officers interviewed felt that no other formal mechanisms or institutional structures were necessary.

A formal centralized police department, a regional organization to facilitate interlocal interaction and to gain benefits from economies of scale seems to be both unnecessary (as far as facilitating interaction) and legislatively difficult (because of the geographical limitations on powers of officers). The centralized bureaucracy could coordinate activities of divisions based

on local boundaries. It seems, however, that coordination that is presently necessary already exists informally, and a formal superstructure would merely add personnel and facilities whose cost probably could not be recouped through economies of scale.

The public works departments of the communities studied do have organizations similar to the police departments. They have no forum in which discussion can be facilitated. Initiatives require more effort on the part of the individual communities. As a result interaction and cooperation has been dyadic in nature. This may not be that bad, though, because their needs seem to justify such interaction.

Since police officers are legislatively confined to their communities their efforts in collaborating focus on operational procedures and information. Public works services are not so restricted. They can extend their services across local boundaries. They use semi-permanent capital equipment in some of their services, such as water and sewer pipes and pumps. Therefore, they cannot reorganize operations such as police departments can. In order to efficiently and effectively accommodate development and provide services they turn toward their neighbors for assistance in providing the services.

Formal organizations for the discussion of problems and the exchange of information about the delivery of water and sewer services might not be worth the time involved.

With other public works services (such as highway maintenance, refuse collection and disposal, and park construction and maintenance) such an organization might be helpful. Since assessment for such services is more difficult to calculate than for water or sewer services, and since communities usually purchase only enough equipment and facilities to service themselves it is more difficult to extend such services beyond local boundaries. Therefore, procedures of delivery become more important. Organizations such as those police departments participate in would provide a forum for the exchange of ideas and the initiation of discussion.

It is not recommended that a centralized cooperative organization of police services or public works services be formed. Such an organization would require extensive reorganization of the departments involved as well as the governments of the communities in general. A centralized bureaucracy in each of the service systems could coordinate the activities of the divisions of each among the communities involved. However, it seems that with police services, the coordination presently necessary already exists; and with public works services, problems relating to operational procedures and equipment used might be too complicated and costly to overcome. Such a formal centralized superstructure would also add personnel and facilities whose cost probably could not be recouped through economics of scale.

The towns studied here are already cooperating with one another in the delivery of services because it allows them to deliver services more efficiently and effectively. Even though cooperation is primarily informal (verbal agreements between administrators of departments of each community), it is working. To suggest that informal agreements should be replaced with formal ones simply because they, theoretically, are more dependable (because they have some legal standing to fall back on) is questionable in this situation and as a general practice. Certainly there is more security in formal agreements than in informal ones, even if it is primarily psychological; but, making informal agreements is easier and less time consuming. The informal cooperative efforts which these communities have undertaken are more appropriate than formal ones given the administrative and organizational constraints present.

IV. CONCLUSIONS

If communities prefer different governmental organizations and procedures to make policy and deliver services, then why should they change to facilitate the use of formal systems to cooperate with each other. This is what would be required for some formal mechanisms, such as special districts. Other formal mechanisms, such as councils of governments, are hampered by these differences. Even though they provide a forum for initiating agreements and structure for formulating and carrying them out, they do so at a cost. The primary cost is time, delays caused by superficial discussions and "red tape".

When communities informally cooperate in the delivery of services they seem to avoid these problems. Yet, the Adivsory Commission on Intergovernmental Relations has stated that informal cooperation is unsuccessful at meeting nine objectives which they regard as desirable in areawide service delivery. It says: that it does not facilitate an adequate geographic area of jurisdiction; that spillover costs and benefits cannot be contained within the area of jurisdiction responsible for providing service; that it does not facilitate an adequate geographic area of jurisdiction; that spillover costs and benefits cannot be contained within the area of jurisdiction; that spillover costs and benefits cannot be contained within the area of jurisdiction responsible

for providing service; that it does not allow for the resolution of conflicts and the balancing of needs and resources; and, that it does not facilitate other objectives desirable of a cooperative system (see Table 7). The Commission compares informal cooperation with other mechanisms and summarizes their conclusions in a chart. The chart is a continuum showing the effectiveness of areawide service delivery approaches versus their feasibility or political acceptibility (see Figure 10). It says that informal cooperation is the most politically feasible of thirteen alternatives; but at the same time, it is the least effective. 15

It is true that informal cooperation does not respect the criteria of an areawide service delivery system, criteria which communities should try to meet when setting up a system. However, the nature of informal cooperation is different from other, more formal, cooperative systems. Formal systems are comprehensive approaches to meeting service needs. They are a mechanism prepared for most of the possible areawide problems (or needs) a system might be confronted with in its future. Informal cooperation is an incremental approach to meeting service needs. It allows communities to face problems (or needs) as they arise. It allows communities to more efficiently and effectively use their present service systems, to compensate for their inadequacies.

TABLE 7

AREAWIDE SERVICE DELIVERY APPROACHES AND OBJECTIVES

Type of areawide approach	Adequate geographic area of jurisdiction	Legal and administrative ability to perform assigned services and implement plans	Contain spill- over costs and benefits within jurisdiction responsible for providing service	Permit realization of economies of scale: Staff/Line	of conflicting	Increase coordination of local projects with areawide functional and comprehen- sive development plans	Ensure equitable distribution of public goods and services	Maximize citizen participation	Performance of functions remains controllable by and jurisdiction is accountable directly to resident
Informal Cooperation	_	-	<u>:</u>		-	-	-	-	-
Service contract/ joint services agreement	0	+	0	+ +	-	-	0	-	-
Regional council of local elected officials	đ +	-	-	+ -	+	+	-	0	-
Federally encourage substate district	ged ct +	-	-	· o –	-	+	-	0	-
State planning and development district	d +	0	-	0 -	+	+	-	0	-
Local special district	+	+	0	+ +	-	-	0	-	-
Transfer of functions	0	+	0	+ +	-	0	0	+	+
Annexation	+	+	0	+ +	+	0	0	+	+
Areawide special district/ public authority	· +	+	+	+ +	-	-		-	-
"Unbrella" regiona council	11 +	+	0	+ +	+	+	-	0	-
Urban county	0	+	0	+ +	+	0	+	+	+
City-county consolidation	0	+	0	+ +	+	0	+	+	+
Federated area- wide government	+	+	+	+ +	+	+	+	+	+
KEY + = 8	successful	0 = occasional1	y successful =	unsuccessful					

SOURCE: The Advisory Commission on Intergovernmental Relations.

Regional Decision Making: New Strategies for Substate Districts.

Table I-2, page 12.

effective

most

New Strategies For	
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Commission	Substate Districts. Table
RCE: Advisory Commission on Inter	Substate
\simeq	

effective

EFFECTIVENESS AND ACCEPTABILITY OF REGIONAL SERVICE DELIVERY APPROACHES

least feasible/ acceptable most feasible/ acceptable

Federated Areawide Government

City-County Consolidation

Urban County

"Umbrella" Regional Council

Areawide Special District/ Public Authority

Annexation

Transfer of Functions

Local Special District

State Planning and Development District

Federally Encouraged Substate District

Regional Council of Local Elected Officials

Service Contract/Joint Services Agreement

Informal Cooperation

This is a viable approach to interlocal cooperation in the delivery of services. Assuming that communities are the basic building blocks for solving areawide problems, any form of cooperation must respect them as individual entities. Certainly, they are not isolated from one another; there are issues dealing with the delivery of services which do not respect local boundaries. These issues must be dealt with, and informal cooperation is a method of doing so while at the same time respecting the autonomy of communities.

Home rule is a critical issue when considering interlocal cooperation. Equally important, however, are issues
dealing with economics, administration and citizen access
and control. Formal systems are necessary in some situations, especially when comprehensiveness in meeting the
Advisory Commission's nine objectives. But in other
situations, formal systems are either not necessary or
require extensive reorganization of local governments in
order to be facilitated. Therefore, it is the conclusion
of this analysis that informal cooperation has its place,
and that communities should cooperate with one another in
the delivery of services in whatever formal or informal
manner their organizational and administrative situations
necessitate.

FOOTNOTES

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 - ⁹<u>Ibid</u>., p. 118.
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 - ¹³Ibid., p. 114.

 14 Town of Wellesley, Annual Report 1978 (Wellesley: Town of Wellesley).

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¹⁹Ibid., p. 13.

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