

## **CAPE RATINGS SPECIFIC ASSESSMENT**

### **ADHERENCE TO CITIZEN ADVOCACY PRINCIPLES**

#### **Principle one: Advocate independence**

Description from CAPE

In order to effectively represent protege needs, advocates must be free to develop a primary loyalty to proteges and to act as independently as possible in meeting protege needs. This means that: (a) advocates should see themselves as supported by, but independent of, the advocacy office itself; (b) advocates should see themselves as independent of the agencies and settings which provide services for proteges; and (c) advocates should be able to see themselves as independent from the families of proteges in those instances where family interests are different from those of individual proteges. Briefly, the citizen advocacy program should be structured to support citizen advocates as unpaid, independent volunteers to an individual person.

#### **Unpaid roles (CAPE rating R111)**

Description from CAPE

The citizen advocacy relationship itself offers a wide range of intangible rewards for participants. To the extent that advocacy programs offer advocates material or other external compensation for their activities, the program compromises the advocates capacity to freely and primarily identify with a proteges needs, and may create a barrier to independent advocate action. Further, external compensation to advocates interprets proteges as being people to whom others would only relate if they were paid, and denies individual proteges the 'world building' experience of a freely-given relationship.

Compensation can take a variety of forms. The most obvious and the most compromising is money. Other forms of compensation include: academic credit, paid time off from regular employment and service in expectation of a paid position. Any external compensation mechanism that raters discover should be rigorously tested against the principle that citizen advocate must be Unpaid volunteers.

#### **Loyalty to proteges (encompassing CAPE ratings R11211, R11212, R1122)**

Description from CAPE

Most proteges will be at least somewhat more dependent on human services and on their families than will others of their age. The people on whom a protege depends will develop their own perspective on the protégé's needs. Sometimes these perspectives are so strong as to distort the protégé's own interests to conform to the needs of service providers or even families. It is essential to Citizen Advocacy that the advocate

strives to define situations from the perspective of the protege, and to act to influence situations involving the protege in terms of the protégé's perspective. While the principle can be simply stated - the advocate voluntarily acts as an agent of an individual protege - defining a meaningful awareness of the protégé's perspective is typically a process which will develop through the advocate / protege relationship. The more complex a protégé's situation, the more this necessary task will challenge the advocate.

### **Principle two: Program independence**

Description from CAPE

In order to support the development of effective advocacy relationships, advocacy office itself must be independent. Independence implies the greatest possible freedom from conflict of interest in administration structures and funding.

#### **CA program separation from direct service (CAPE rating R1211)**

Description from CAPE

A Citizen Advocacy program should share few or no aspects of governance or administration with an organisation providing clinical or case management services which are relevant to actual or potential proteges. An advocacy office should either have a governing board which does not govern any services, or at least it should be governed by a governance structure which has no responsibilities for the provision of direct services to actual or potential proteges.

Staff members should be independent of loyalties to agencies which would provide services to (potential) proteges. For instance, staff should not hold concurrent jobs with service-providing agencies and key staff with strong family ties to service providers should be avoided.

While the governing board members should be independent of agencies that might service proteges, some (perhaps a third) of the members might come from such agencies if their presence brings important benefits and safeguards are implemented to reduce the chances that their contribution does not jeopardise the advocacy office's independence.

#### **Independent CA office location (CAPE rating R1212)**

Description from CAPE

The physical location of the advocacy office should enhance its independence. Advocacy offices should not share space with, or be in direct proximity to, direct service providers that might service (potential) proteges.

### **Independence of funding sources (CAPE rating R122)**

Description from CAPE

The funding of CA offices - including indirect and in-kind subsidies such as donated space, equipment, supplies, secretarial services, etc. - should come from as distance a source as possible from funders who operate services which could serve (potential) proteges. As well, an advocacy office should have multiple, distinct funding to ensure that freedom of perspective and action are not compromised if one or several funders disagree with the advocacy office's actions, and thereby do remove support...

### **Principle three: Clarity of staff function**

Description from CAPE

In order to develop the full range of its potential, an advocacy office needs a staff who understand the nature and possibilities of Citizen Advocacy and who communicate this understanding by supporting, not supplanting, advocate/protege relationships; and by directing their energies toward building and maintaining the citizen advocacy program as a whole. Clear and effective staff functions requires the distinction of a well defined staff role from the role of the citizen advocate, non competition with advocacy roles, and staff involvement with others in developing Citizen Advocacy concepts and program.

### **Focus of staff role definition (CAPE rating R131)**

Description from CAPE

Advocacy office staff are responsible for planning and implementing a Citizen Advocacy program which would meet an increasing amount of the need of the community's handicapped people for individual citizen advocacy relationships. Whilst the focus of each advocate is on the individual protege, the focus of advocacy office staff is on the advocacy program as a whole. While the perspective of each citizen advocate is on the development of the individual relationship, the perspective of the advocacy office staff is on the long-term development of the potential for a wide variety of relationships. To ensure that adequate energy is available to develop the advocacy program as a whole, staff role should be structured and supported so as to ensure that the staff do not confuse their roles with citizen advocate roles. Advocacy office staff who identify themselves with the needs of a particular protege are unlikely to maintain the perspective necessary to the long-term needs of present and future proteges. Advocacy office staff who see themselves as responsible for personally representing the needs of proteges as a group (as advocates for all the program's proteges') are unlikely to maintain the focus of energy necessary for program development and individual advocate recruitment and support.

### **Staff independence from other advocacy forms (CAPE rating R132)**

Description from CAPE

As a group, people with handicaps need a number of types of advocacy. For example, some will need legal assistance to establish their rights in a particular situation. Many will benefit from a variety of class advocacy efforts pursued on behalf of handicapped people as a group. Each advocacy form has its own strengths and limitations; different advocacy types need different organisational and belief structures so as to ensure their optimal delivery. Each needs to make unique demands on its staff. This rating is concerned with the differentiation of the advocacy office staff from other necessary or at least desirable advocacy forms. This does not imply that element of Citizen Advocacy program might not be involved with other advocacies. Indeed, other rating will reward Citizen Advocacy programs which develop advocates associates who represent special knowledge in other advocacy forms, and programs which encourage advocates to become active in voluntary associations. Moreover, this rating applies only to advocacy office staff in their work roles, and is not intended to discourage staff from citizen activism in their non-work time.

### **Ties to the Citizen Advocacy movement (CAPE rating R133)**

Description from CAPE

CA is a helping form which is especially demanding of staff. Though the concepts basic to Citizen Advocacy can be simply stated, their implications are complex and continue to be developed. Moreover, there are many forces acting on the typical Citizen Advocacy office which push it toward limiting its scope, e.g., over focusing on the recruitment of advocates to fill one type of advocacy role; concentrating on proteges with one particular type of need; or confusing its mission with another advocacy form. Finally, reward for CA office staff are not clear and immediate. Staff need the back up and support of governing board and advisory committee members who are themselves involved in increasing their identification with an understanding of the CA movement. Mechanisms for providing such mutual support include:

- activities which build a sense of collective identity such as an annual picnic or other celebration shared with advocates and proteges;
- membership in CA interest groups and / or associations;
- participation in training activities focused specifically on Citizen Advocacy values and practice;
- developing concepts and practices which contribute to the CA movement by developing position papers, disseminating useful practices, sponsoring, contributing to or presenting training events.

Participation in such activities can occur locally, among CA offices in a region, a state or province, or nationally/internationally.

**Principle four: Balance orientation to protege needs.**

Description from CAPE

People with handicaps have a wide variety of needs for representation and relationships which can be met by citizen advocates. One of the greatest potential strengths of Citizen Advocacy, is the flexibility to define and support those relationships which can, if the participants choose, fit the changing individual circumstances of a protege. However, realising this potential requires that the Citizen Advocacy office staff should be capable of developing and implementing complex, multi-path relationships. Many Citizen Advocacy offices have developed in the absence of such a multi-path strategy, and have greatly narrowed both the types of protege need they perceive, the kinds of advocates they recruit, and the kinds of support they offer. This narrowing can easily define the pattern of growth of a Citizen Advocacy office over time such that potential flexibility becomes fixed in one or a few categories of response. Narrowing the range of possible citizen advocacy roles can result either in provision of overly restrictive relationships, or an inability to meet a substantial need for protection.

These ratings consider the Citizen Advocacy office's balance of response to protege needs from two complementary perspectives: protégé characteristics which call for certain types of citizen advocacy, and the range of citizen advocacy role options which the Citizen Advocacy office structures.

**Protege characteristics**

Many individual characteristics of advocates and proteges must be considered in developing an appropriate individual match. however, review of Citizen Advocacy implementation to date has identified four dimensions of protege need which have the potential to be ignored or under-emphasised. These are: (a) a limited age range in protege recruitment, thus limiting not only the range of their services but also the potential to recruit some advocates who identify more readily with an ignored age group; (b) service to people who have limited ability to reciprocate relationships; (c) people who need active spokespersonship to protect their rights; and (d) people who need relationships which will be long lasting.

**Protege age (CAPE rating R1411)**

Description from CAPE

People of all ages can potentially benefit from citizen advocacy relationships. Even newborns may require citizen advocates to protect them if their natural families and the human service system are uncertain as to their best interests.

At least eventually, if not initially, the advocacy office should plan its recruitment strategy to include people of all ages and should design its advocate recruitment process to invite citizens who are interested in representing people of all ages.

**Protege capacity for relationship reciprocity (CAPE rating R1412)**

Description from CAPE

A number of people who need the protection and representation offered by Citizen Advocacy are limited in their ability to respond to others, including citizen advocates. Non-responsiveness may be a general characteristic of the person - as when a person is profoundly handicapped - or it may primarily characterise the person's strong negative or abusive response to people who are seen as trying to 'help' or control. One of the major challenges facing Citizen Advocacy offices lies in recruiting and supporting advocates to fill a variety of roles for people who do not reciprocate.

**Protege need for spokespersonship to defend human and legal rights (CAPE rating R1413)**

Description from CAPE

A number of handicapped people will, at some point in their lives, need another person to vigorously represent their interests in a situation in which their rights are (or are at risk of) being compromised. A person's need for such spokespersonship can be effectively - even inspiringly - met by a citizen advocate, either on the basis of an ad hoc, short-term relationship, or in the context of a long term relationship. Since spokespersonship needs usually come and go in a person's life, this rating is based on evidence of a history of vigorous spokespersonship by a variety of citizen advocates.

**Protege need for long term relationships (CAPE rating R1414)**

Description from CAPE

A substantial number of people with handicaps need a relationship which will endure over a long time - perhaps even throughout a person's life. Many of them will have experienced what has been called a 'relationship circus' in which 'helping' person after 'helping' person has come into their lives and then, as quickly, left. The advocacy office should recognise and seek response to this need.

## **Diversity of advocacy roles (encompassing CAPE ratings R1421 and R1422)**

Description from CAPE

The range of citizen advocacy roles which an advocacy office staff conceptualise and plan for as they recruit, match, and support advocates is perhaps the single most powerful determinant of an offices' long-term success. This does not suggest that citizen advocates themselves are, or should be, bound to any sort of a 'job description.' Citizen advocates choose the investment they wish to make, and choose, together with the protege, the direction and content of their relationship. However, most advocates make their choices in the context of options defined and supported by the advocacy office staff. Without a complex and flexible scheme for defining potential advocate roles, the complex and varied needs of potential proteges will be funnelled into only a few categories of response.

There are at least three dimensions necessary to define an adequate range of advocate roles:

1. The distinction between formal and informal relationships.
  - (a) Formal relationships that are created by the due process of law and include purely instrumental roles (e.g. conservator, or guardian of property) and instrumental-expressive roles (e.g., adoptive parent, or plenary guardian of a person).
  - (b) Informal relationships are created by the choice of those who are party to them.
2. The instrumental-expressive action continuum where instrumental actions are taken to solve practical, material problems, and expressive actions are taken to meet needs for communication, relationship, support and love.
3. The degree of demand experienced by the citizen advocate in the relationship.

## **Availability of crisis advocates (CAPE rating R1423)**

Description from CAPE

Situations will arise in which a person has a critical, immediate need for representation or instrumental support. The typical process of recruiting, orienting, and matching advocates will be often too slow for needed immediate response. In addition, a protege who is already matched needs to avoid involvement in crisis situations which are so demanding as to strain the ability of the advocate to support the relationship. In order to ensure that the advocacy office can adequately represent people in crisis without drawing staff into a

service-providing relationship with an individual protege, the office should recruit and support a number of stand-by, crisis advocates. Crisis advocacy relationships will typically be instrumentally focused and time limited, though the potential exists for the advocate (and where possible the protege) to choose to broaden their relationship after the crisis situation is resolved.

### **Avoiding social overprotection (CAPE rating R143)**

Description from CAPE

CA is founded on the conviction that - eventually if not immediately - citizen volunteers can be recruited and supported to provide handicapped people with as much support and / or protection as they need and not more. This requires: (a) that the CA office identifies proteges who need formal relationships and recruits advocates willing to provide them (this is rated in R1421 Diversity of current advocate roles); and, (b) that the CA office minimises the possibility that a relationship will be socially overprotective (rated here).

Socially overprotective practices are based on a presumption that handicapped people are less capable of exercising their rights and meeting their needs than they in fact are, or could become with increased responsibility. Social overprotection is detrimental both in reducing the level of development challenge a person experiences and in its contribution to the stereotyped perception of incompetence.

### **Principle five: Positive interpretations of handicapped people (CAPE rating R15)**

Description from CAPE

The advocacy office should be a model in the interpretation of handicapped people. This implies both a systematic, highly conscious orientation to avoiding various types of deviancy-image juxtaposition and actively seeking the most positive possible and yet honest interpretation. This does not mean that the advocacy office will deny the existence of people's handicaps, or the nature of their social situation.

Various types of deviancy images and powerful historic negative role perceptions have been described in detail by Wolfensberger in Normalisation (Toronto, 1972) and by Wolfensberger and Glenn in PASS 3 (Toronto, 1975). Interpretations which suggest these negative roles or images, even very subtly, contribute to the devaluation of people with handicaps.

Specifically, the program should avoid places actions, or images which connect handicapped people with images or practices which connote:

- death or decay



- subhumanity
- animality
- menace
- triviality, worthlessness
- sickness
- pity or charity
- eternal childhood

Instead, the advocacy office should seek the most highly positive, value-conferring and yet valid possible associations which support the developmental growth potential, citizenship role, and individual human personhood of people at risk of social devaluation.

## **CITIZEN ADVOCACY OFFICE EFFECTIVENESS**

Description from CAPE

The impact of a Citizen Advocacy office depends on the availability of sufficient staff time to effectively perform a balance of seven key activities, which, include: protege recruitment, advocate recruitment, advocacy orientation, matching, follow-up and support, ongoing training, and involvement of advocate associates. These activities will back up and coordinator volunteer citizen advocates so as to maximise the probability that their proteges will experience continuity over time despite changing needs.

### **Vision and creativity of protege recruitment (CAPE rating R21)**

Description from CAPE

Protege recruitment practices have a strong influence on the direction of the advocacy office's development. If protege recruitment is confined to a narrow group of people, it will make the development of an adequate range of advocate role options either impossible or reliant on significantly over or under servicing some proteges. If protege recruitment is essentially a passive process which relies on human service agencies for protege referrals, it is possible that many people most in need of Citizen Advocacy will be screened out as 'unsuitable for a volunteer' or even as a person for whom service providers are disinterested in active spokespersonship. If protege recruitment does not result in valid information which clearly defines protege needs, preferences and characteristics, advocate recruitment cannot be targeted precisely.

### **Advocate recruitment (CAPE rating R22)**

Description from CAPE

Effectiveness in advocate recruitment results in a growing number of people becoming involved in each of the fifteen possible citizen advocacy roles. Ensuring effectiveness requires a written plan which is updated at least annually, which specifies target groups for recruitment, recruitment objectives, time-lines, and a variety of options for recruitment activities; is coordinated with the protege recruitment plan; and is intended to track performance. Advocate recruitment strategies which rely on direct, person to person efforts which are specific to the defined needs of a particular protege have proved most effective. Second in effectiveness appears to be presentations which are planned to interpret specific protege needs to a target audience selected to ensure a high likelihood of producing people who would accept a particular advocacy role. Generalised public appeals, or generalised presentations to unselected groups, have shown only minimal return compared to more specific tactics.

### **Advocate orientation (CAPE rating R23)**

## Description from CAPE

The orientation required by advocates who are beginning a citizen advocacy relationship provides them with a necessary framework of understanding. Orientation can be productively provided into pre-match and post-match time blocks. In whatever minimum time is allocated to orientation, there should be adequate coverage of at least:

1. The social situation of handicapped people;
2. Description of the basic principles of Citizen Advocacy, with special reference to advocate responsibilities to proteges, and to the full range of necessary citizen advocacy roles;
3. Clear description of the role and function of the Citizen Advocacy office from the perspective of what advocates can and should expect from staff and advocate associates;
4. Information on a range of effective means of meeting the advocacy needs of handicapped people;
5. Information on other available resources to assist advocates and proteges; and
6. Specific information necessary to an initial sense of understanding and competence in undertaking a chosen advocacy role.

## **Advocate - Protege matching (CAPE rating R24)**

### Description from CAPE

Matching involves the selection of an advocate and a protege who are likely to begin a successful relationship, and providing an initial structure for introducing each to the relationship. In terms of advocacy office staff activity, the quality of the match depends on:

1. The quality of information available on the specific needs, personal characteristics, and preference of individual proteges.
2. The quality of information available on the advocate initial expectation, the type of advocacy role he/she is interested in, the level of advocate commitment and advocate skills, personal characteristics and preferences. What becomes apparent here is the utility of advocate recruitment methods which are specifically targeted to well defined protege needs.
3. The ability of the staff performing the match to select advocate/protege pairings which provide a best fit between advocate expectations and characteristics, and protege needs and characteristics.
4. The ability of the staff devising the match to (a) predict areas of a relationship which are apt to lead to confusion, initial disappointment, or conflict; and (b) to structure initial contacts so as to minimise potentially negative experiences.
5. The ability of the staff devising the match to sensitively and positively interpret the need of each person to the other.

### **Follow-up and support (CAPE rating R25)**

Description from CAPE

Follow-up and support activities are distinct, but closely related. Follow-up includes regular, systematic, low profile checks on the status of each relationship; provides the CA office with a measure of its effectiveness in meeting the needs of proteges; and identifies an advocate's need for support.

Support activities provide practical and, when necessary, emotional support to advocate/protege relationships. The rating assesses the responsiveness of the CA office to needs for follow-up and support and the ability of the office to balance responsiveness to advocates' and proteges' needs with avoiding intrusion on developing relationships.

### **Ongoing training (CAPE rating R26)**

Description from CAPE

As advocates become involved in their relationships, some will desire additional training in some aspect of concern to the relationship. While orientation and follow along are necessary for each advocate, ongoing training should be available according to the choice of individual advocates. For efficiency, the advocacy office itself should only provide training when no other suitable sources of training are available. In particular, the citizen advocacy office should carefully weigh any decision to provide technologically oriented training on handicaps, available resources, etc. or training that would be better presented by people who practice another advocacy form. Highest priority for CA office-sponsored should be exploration of the values necessary for provision of moral services, and the handling of CA challenges and dilemmas.

### **Advocate associate emphasis (CAPE rating R27)**

Description from CAPE

Advocate associates are volunteers to the advocacy office who possess skills and knowledge useful to advocates and proteges. From time to time, an advocate associate can offer advice and perspective on such matters as the technical dimensions of the services which a protégé receives or seeks to receive, strategy development for management of a demanding situation, or advice on technical matters that have relevance to the relationships (e.g., advocate on managing an issue related on guardianship of property). A sufficient number of active advocate associates provides a safeguard against staff being drawn into individual advocacy activities, and provides a major support to advocates and their proteges who chose to avail themselves to their counsel. Advocate associates should be respectful of the advocate role in the

relationship, and should avoid supplanting efforts the advocate is willing to make.

The advocacy office should recruit, orient and actively utilise a number of advocate associates who represent a variety of technical skills. Further, staff should actively link advocates to advocate associates, as necessary. Advocates should be informed of the availability of advocate associates, the skills they possess, and how to gain access to them.

### **Balance of CA office activities (CAPE rating R28)**

Description from CAPE

The seven previous ratings have examined each key activity in turn. This rating requires consideration of the balance of these activities and its likely long term effects. A CA office which has an effective balance of activities will do enough of the right thing at the right time to ensure that it will achieve its mission. Some examples of an ineffective balance of activities follow:

A CA office may have an ineffective balance of activities in consequence of doing the right thing at the wrong time. For instance, staff may spend a disproportionate amount of time in advocate recruitment before protege recruitment is well established. This typically results in a substantial delay between the time an advocate volunteers and the time she /he is matched, and could lead either to imprecise matching or advocate drop out.

An office may overinvest its time in one activity at the expense of another needed activity. For example, if time is spent on recruitment at the expense of supporting advocate/protege relationships the office may lose relationships which have the potential to develop to effectively meet protege needs.

An office may do too much of a needed activity. For example, staff may become overly concerned with protege recruitment early in the office's history and make extensive efforts to 'get referrals'. This may result in a backlog of proteges too large to match effectively.

### **Encouragement of advocate involvement with voluntary association (CAPE rating R29)**

Description from CAPE

Citizen advocates can derive multiple benefits from membership in a voluntary association concerned with class advocacy on behalf of people who share their protégé's handicap. Often, they can find a source of information, personal support, and civic influence which can potentially benefit their protege. As well, based on their personal knowledge of their protégé's situation, citizen advocates can make a substantial contribution to the effectiveness of a

voluntary association. While it would be inappropriate for the citizen advocacy office to require the advocates and proteges to join voluntary associations, membership should be actively encouraged.

**Sufficiency of CA office staff (CAPE rating R210)**

Description from CAPE

Though Citizen Advocacy is a volunteer effort, the key activities which establish and support volunteer relationships require the contribution of staff that is (a) full time, and (b) almost always paid.

The current state of knowledge does not permit the writing of an exact, or even an approximate, staffing formula for Citizen Advocacy offices. However, many programs are in fact understaffed and cannot manage all the necessary seven key activities for the number of relationships they carry; raters should exercise their best judgment in terms of required work load and growth potential.

## **PROGRAM CONTINUITY AND STABILITY**

Description from CAPE

If the advocacy office is to support citizen advocates who maintain long term relationships, it must maintain itself over time. If staff are to have the capacity to perform the key activities required to develop and to support the program, there must be a stable organisational and financial context. These ratings assess features of the program structure that contribute to program continuity and stability.

### **Feasible governance and guidance structures (CAPE rating R311)**

Description from CAPE

Implementing and maintaining an advocacy office offers a variety of challenging organisational problems. The program should have a board and advisory committee structure which maximises the involvement of local citizens in controlling and advising the program.

### **Composition of governance and guidance bodies (CAPE rating R312)**

Description from CAPE

The governing board and advisory committee structure should reflect a balance of skills, identities, interest and abilities.

### **Level of leadership involvement (CAPE rating R313)**

Description from CAPE

Members of the board and advisory committees need to be actively involved in controlling and advising the advocacy office. Without such active involvement, the office will come to 'belong' to the staff with the probable result that program reputation and continuity will come to depend solely on staff who are, as a group, more likely to be transient than a well-established board. In that case:

- major board involvement will be with the (possibly uninformed) hiring of new directors;
- the office will lack advice and guidance from a variety of people
- the office will have a narrowed base of community support, particularly when difficult, value laden choices must be faced.

### **Long term funding potential (CAPE rating R321)**

Description from CAPE

Many advocacy offices are destroyed by their over reliance on funds which are time limited (e.g., developmental disability funds) or temporary (e.g., various manpower -related grants). An office needs stable source for most of its funding, so as to avoid potential loss of program continuity and an annual panic about funding, and diversion of staff time from other activities. There should be a long term financial plan which specifies funding objectives, sources, and alternative actions for developing multiple sources of funding. In assessing long term funding potential, raters should distinguish between funds which have a definite time limit and funds which must be reconfirmed annually but have not set time limits (such as a continuing legislative appropriation). Funds which are indefinitely renewable but must be annually confirmed should be considered as potentially stable.

### **Local funding participation (CAPE rating R322)**

Description from CAPE

An advocacy office which has evidence of strong local funding support is in an advantageous position. Not only does local money demonstrate community confidence, it also provides a source of matching funds for a variety of funding from other governmental levels. Support may be in kind (donated space, time, or equipment), but is most impressive when it is in cash...

### **Program legitimization (CAPE rating R323)**

Description from CAPE

An advocacy office's position with funders depends in part on the degree of legitimization it enjoys. At the lowest level, this involves the capacity to attract endorsement in seeking funds from a distant treasury. More significant is recognition by a community or high-level planning or fund-allocating board (a state's development disability plan, or the decision of a provincial-level civic association to act as a fund raiser, etc.). Governmental action which authorises the program without appropriation of adequate funds constitutes the next level of legitimacy. At the highest level is the presence of an endorsement or a mandate to provide the program, accompanied by authority and money for operations...