

5 Designing intervention and implementation

Once policies are formulated, legitimated and have resources attached to them the task of actually delivering public services has to some extent only begun. The basic design of intervention may be contained in part within the formulation, but the implementation process itself requires careful design and consideration. Although implementation is sometimes dismissed as “mere administration” in reality administration is far from “mere” and the final impact of policies may be shaped as much by the manner of implementation as by the formal design of the programs. If we return to that initial definition of policy and politics as “Who Gets What” then the final decisions about those allocations may be made through implementation.

In addition to the direct impact that implementation has on the distribution of benefits and costs among members of the public, implementation of this process also affects the overall legitimacy and policy capacity of political systems. The majority of contacts between the state and the society come through the public bureaucracy during the process of implementation. These contacts provide the public with a sense of the probity, representativeness (see Peters et al., 2013) and responsiveness of the bureaucracy. A number of studies of the public bureaucracy have indicated that their treatment of citizens is reflected in their evaluations of the public sector, and therefore in the legitimacy of that political system.

In design terms, implementation should be considered as a central component of a more general intervention strategy. It is relatively simple to say that policymakers want to alter the behavior of individuals in some manner, or they want to shape the economy in certain ways. It is more difficult to determine how those changes can be actually brought to fruition. At what points in the underlying social and economic processes is it most effective and efficient to intervene? And through what mechanisms? And what are the barriers to making those interventions effective? This chapter and the next will discuss interventions designed to produce change. This chapter will discuss implementation in general, and the following chapter will discuss policy instruments as an important analytic approach to the process of implementation.

Much of the discussion of implementation could be characterized as “the horrors of war” (Linder and Peters, 1987). The study of the concept was initiated by examining failure (Pressman and Wildavsky, 1974), and much of the subsequent literature has also focused on failures to implement successfully. This emphasis on failure appears in other areas of policy studies (Bovens and ‘t Hart, 1996) but has been a dominant theme in the study of implementation. That emphasis on failure may reflect in part the difficulties inherent in implementation, as well as an intellectual perspective that demands perfect implementation. That intellectual perspective was informed in part by a legalistic perspective that assumes perfect compliance with law, even if that law is vague and perhaps unenforceable (Lane, 1983).

Although interventions and implementation remain a central component of the policy process the academic interest in implementation has to some extent waned. This declining interest may merely represent fad and fashion in policy studies, but also represent some of the research difficulties involved in identifying the effects of administration on policy outcomes. To be able to understand why programs are not as effective

as hoped by their “formators” requires tracking through the process of implementation, much like the original Pressman and Wildavsky study. Even then, any failures in the policy may not be attributable entirely to implementation failures. The need to rely heavily on case studies and the difficulties in assigning causation make implementation incompatible with the canons of much of contemporary social science.

The above being said, there has been some revival of interest in implementation (Winter, 2011) that has addressed some of the fundamental administrative and policy issues involved in this stage of the policy process. For example, there has been greater investment in understanding compliance with law and the associated effects on implementation (Saetren, 2014). In addition, there has been a revival of theorizing about street-level bureaucracy (Hupe and Buffat, 2014) and with that more general consideration of the discretion, and the control of discretion, among the lower echelons of civil servants (Maynard-Mooney and Musheno, 2003; Brodtkin, 2011).¹

Implementation as a component of the policy process

Governments have been implementing policies for as long as they have been in the business of governing. Few if any programs can make themselves perform automatically, so some means of having them achieve their objectives must be devised. The principal actor in implementing programs in government is the public bureaucracy. That said, however, increasingly the public sector utilizes non-governmental actors to assist in implementation, or even to be the primary source of implementation. And even if the public sector does retain control over implementation it is unlikely that any single organization is fully responsible for administration of public programs, and therefore implementation involves the interaction of a number of organizations and even individual actors.

Implementation outcomes as probabilities

The multiplicity of actors involved in implementation motivated the initial discussion of this concept by Pressman and Wildavsky (1974). Prior to their popularizing the term “implementation” the activity of translating programs into action would have been discussed as just plain public administration. Pressman and Wildavsky, however, emphasized the difficulties involved in making programs work, especially in the multi-organizational environment that characterizes most public programs. The extensive subtitle to their book emphasized that good policy ideas often do not go into effect as planned, and that scholars and practitioners need to understand those implementation failures.

To understand the difficulties involved in implementation Pressman and Wildavsky developed the concept of “clearance points”.² These were points along the process of implementation at which a positive decision was required for the process to continue as expected by the “formators” of the process. This analysis indicates just how complex implementation can be, especially in a federal country such as the United States (see also Hanf and Toonen, 1985; Doonan, 2013). In their study of the implementation of an economic development program developed in the federal government in the San Francisco Bay area, Pressman and Wildavsky identified over one hundred clearance points at which the implementation process could have been stalled and killed, whether intentionally or simply by lethargy or poor administration.

The problem presented to policymakers by the large number of clearance points in programs such as the program discussed by Pressman and Wildavsky is that one of these may be sufficient to derail a program. Even if actors at each of these clearance points are in fact committed to making the program work and are skilled administrators there is still some possibility that implementation will not be successful. Even if the probability of successful implementation at each clearance

point is 0.99 then the probability of successfully implementing through 100 points is less than 0.00001. Implementation therefore requires active political involvement if the program adopted by some organization in government is actually to go into effect in the field.

The need for political involvement in pushing through the implementation process raises the question of just how to alter the behavior of actors involved in making these decisions. Elinor Bowen (1982) began with the fundamental conception about implementation used by Pressman and Wildavsky and then developed ideas about how the active implementer could overcome some of the difficulties identified in the original research on implementation. Rather than accepting passively that there is a chance of failure at each stage the would-be implementer can affect the process positively and increase the possibilities for success.

For example, that active implementer could attempt to create a bandwagon effect, using success at some clearance points to create momentum that could be used to spur other actors to accept the program. That implementer can also be persistent, and not take no as the final answer when implementation fails at one point. That implementer can also attempt to skip over potential bottlenecks in the process to place pressure on the recalcitrant actors. There are other tactics that can be used but the basic point is that any simple, passive conception of implementation does not take into account the possibilities for moving the process forward even in the face of apparent opposition.³ This argument also emphasizes the extent to which implementation, and other aspects of public administration, are fundamentally political activities.

Forward and backward mapping for design

The initial discussion of implementation was conducted as if this component of the political process were simply an exercise in

probability theory. This perspective involved relatively little sense of design but instead tended to take both the political structure and the process of implementation largely as givens. While that analysis provides a background against which to compare the realities of administering policies, it does little to help policymakers who may be attempting to develop a strategy for intervention and implementation.

A second stage in the development of thinking about implementation represented more of an attempt to assist would-be implementers in building more effective systems for putting their programs into effect. Most thinking about making public policies assumes that the formulators of the policy decide what they want to do, and then attempt to put those policies into effect. That image of policymaking to some extent conforms to a democratic vision of governance in which elected officials make policies and then work to implement those policies.⁴

One proposal for designing programs for enhanced implementation was discussed as "backward mapping" (Elmore, 1985). To some extent this proposal involves taking the idea of clearance points from Pressman and Wildavsky and thinking about what can be done in the design of programs to minimize the negative impact of those constraints on implementation. The basic idea is to consider what the actors implementing a prospective program prefer and designing the program around those preferences. The fundamental goals of the program would be driven by perceived needs to intervene, but structure of that intervention might be shaped more by the preferences of the implementers, and the preferences of the target population.

From a design perspective on public policy backward mapping makes a great deal of sense. Rather than thinking about the formulation of a program in an administrative vacuum backward mapping considers the likelihood of success of an intervention. This strategy for shaping programs at least in part on the basis of the probabilities of

implementation success may increase the overall success of the programs. In addition, this perspective on implementation corresponds well with the more evolutionary discussion of policy, assuming that firm designs are difficult to achieve within the complexities of the political world, and the even more complex social and economic systems. Therefore, this potential linking of formulation with the targets through considering feasibility may open the way for more adaptive policy.

Although seemingly desirable from the design perspective, backward mapping also tends to imply that policies would be driven by feasibility rather than by policy priorities. It is not difficult to argue that implementation is difficult and therefore finding means of reducing friction with both clients and implementers can be desirable. But as feasibility tends to dominate real policy preferences then the likelihood of producing effective programs and producing real changes in the target population is reduced.

Multiple actors: implementation structures and networks

As already discussed, almost any implementation effort will involve a number of actors. This observation is to some extent a defining feature of implementation studies, but it is also the foundation for several additional theoretical approaches to implementation. For the two approaches to implementation discussed here the fundamental question is understanding how the interactions among actors involved in implementation occur and how they shape the outcomes of the administrative process.

The more basic of these approaches is concerned with "implementation structures" as the defining feature of the process of putting programs into effect. Bennie Hjern and David Porter (1981) argued very early in the study of implementation that "the single lonely organization" is dead and that it had been replaced by structures involving a number of actors. The death of that single organization may be exaggerated, and

there are certainly cases in which implementation is confined to one organization,⁶ but implementation tends to involve increasing numbers of actors.

While the large number of actors involved in many attempts at implementation may create problems, as indicated by Pressman and Wildavsky and all implementation scholars since, it is also possible to exaggerate those difficulties. Bowen pointed to several means that implementers could employ to avoid passive acceptance of the impacts of clearance points, and other students of implementation have also pointed to means of pushing the process forward even against opposition (Hill and Hupe, 2014).

The potential problems created by multiple actors in implementation are also mitigated in part because these actors are not drawn at random at the outset of each new program, but rather represent institutionalized patterns of interaction (Peters, 2014b). The organizations and other actors involved in implementing social programs, or any other type of program, in a community tend to work together for an extended period of time and often work together on a number of different programs. They therefore develop routinized patterns of interaction and generally develop trust among themselves. Both routines and trust reduce transaction costs among the participants (Calista, 1994) and make implementation proceed more smoothly. This institutionalization does not mean that stability and comity will be preserved across all programs, but it does serve as a good starting point for implementing programs.

Conceptualizing multi-actor implementation as networks is yet another variation in this general theme (O'Toole, 2011). Network theory has become increasingly important in the study of public policy and governance (see Sørensen and Torfing, 2007), and this approach has been applied to implementation in a number of settings. Further, network thinking about implementation tends to integrate some aspects

of the backward mapping approach as network actors tend to be involved in the formulation of policies as well as in their implementation. Therefore, the members of the networks to some extent are designing policies in ways that will help themselves as actors involved in the implementation of those programs.

Network implementation implies a number of actors working together to implement a program. The assumption in these models is that networks are composed of relatively equal actors who bargain among themselves to deliver the program in question. In the other models, even that of implementation structures, there is an assumption that the process is driven by government actors. In the extreme, non-governmental actors are conceptualized as much as potential barriers to the process as they are partners in producing the program. In less extreme views, the social and market actors are partners involved in implementing programs designed primarily within the public sector.

Summary

Beginning with the Pressman and Wildavsky study and moving through the other approaches to implementation, some common strands of analysis appear. Perhaps the most important of these is that implementation is a "game" with a large number of players (see Bardach, 1977), and understanding the interactions among the participants is crucial for understanding the outcomes. Further, this is a political process as well as an administrative process. The politics involved may be organizational rather than partisan, but they are still politics. And finally, because of the first two characteristics, simple legalistic conceptions of implementation are inadequate for understanding what actually happens.

Gaining compliance

Much of the discussion of implementation is done in terms of laws and

the use of political and legal instruments to achieve policy goals. There is, however, also an important psychological element involved in implementation – the need for compliance by citizens and organizations. While the targets for policies may be threatened, coerced or cajoled into compliance with a law, it is much easier for governments attempting to implement the law if they can gain willing acceptance and compliance.

As much as being a characteristic of the policies in question, gaining compliance may be a function of the legitimacy of the programs and of government more generally. Some policy instruments – those relying on information and persuasion – are heavily dependent on the legitimacy of government, or perhaps on the legitimacy of the private sector organizations actually delivering the programs (see [Chapter 6](#)). For those instruments to gain compliance the organizations attempting the persuasion must be legitimate and accepted by the targets of the policy.

It is also important for program designers to realize that compliance through use of rigid enforcement and hierarchy may produce the desired outcome, but it can also be extremely expensive. That expense is not only in terms of the actual expenditure of resources in the public sector but also the potential loss of trust by citizens. Citizens may resent being forced into accepting programs and using more coercive instruments may make implementing other programs in the future even more difficult to implement.

Drift and sabotage

Even if the process of implementation does go forward, it is likely that the policy being implemented will to some extent be altered in the process. As already noted, the real policy is the policy that is implemented, and the complexity of the structures involved in the process tend to produce deviations from the intentions of the framers. At each of those clearance points decisions are being made and even if

and delivered. Even the centerpiece of the Act, the insurance exchanges, involved complex interactions between private insurers, potential purchasers and state (and the federal) governments. It is perhaps not surprising that the first few months of the program were, to say the least, trying (Clemmitt, 2014).

Finally, contrary to the logic of backward mapping, legislation may be written in ways that do not recognize the strengths and preferences of the organizations that will implement it. I have been making the point throughout this volume that organizations within government are crucial for the success of policies, and failure to take the preferences of those organizations into account can readily produce implementation failures. These difficulties in implementation may be manifested when there are sharp ideological differences between members of the implementing organization and the formulator,⁶ but may occur simply when the designers of programs do not recognize the organizational routines and preferences for particular instruments that exist within most public organizations.

Politics

In addition to the coalition politics involved in the creation of legislation, other aspects of politics also make implementation difficult and sometimes move the program as implemented away from the intentions of the formulators of the program. These politically inspired deviations are most likely to appear in presidential and federal systems. In parliamentary systems the legislature and the executive responsible for implementation will almost certainly be aligned politically, whereas in presidential systems those institutions may have conflicting ideas about policies and their implementation. Further, most parliamentary systems are consensus systems (Lijphart, 1984) so that the policy change across governments tends to be less than in presidential systems that function more as majoritarian systems.

Inter-governmental relations may present a particular challenge for effective implementation in federal regimes (Stoker, 1991). The constitutional autonomy of sub-national units in federal systems, and the concurrent jurisdiction of levels of government over more policy areas, means that the central government is generally negotiating rather than mandating policies when working with sub-national governments.⁷ However, implementation within systems of "multi-level governance" can be a challenge in any regime (Hooghe and Marks, 2003). Even if lower levels of government are controlled by the same political party they may still have different priorities from the central government and therefore may implement programs differently than intended. And if there are different political parties involved across the levels of government the threats to implementation are exacerbated.

Multiple actors

As governments begin to utilize more and more third-party actors to assist in implementation, or to take full responsibility for the implementation of public programs, potential barriers to effective implementation arise. Just as sub-national governments may have their own priorities and therefore attempt to implement public programs in their own ways, so too do third-party implementers – market or non-market – also have individual preferences and priorities, although there has been a great deal of enthusiasm concerning the involvement of networks and other social actors in implementation (O'Toole, 2000).

Although much of the discussion of multiple actors is based on potential problems with organizations in the private sector, reforms in the public sector have tended to create more problems of this sort within the public sector itself. Part of the logic of the New Public Management, beginning in the 1980s, is that efficiency and accountability in the public sector can be enhanced by dividing large public organizations into multiple single-purpose organizations usually called agencies (Laegreid and Verhoest,

2010). While these organizations may at times increase the efficiency of administration, their autonomy may also provide them more opportunities to make their own decisions about the interpretation of legislation. Indeed, their pursuit of efficiency in their own terms may undermine their willingness to pursue the collective goals of government.

Although we can think of the difficulties created by this multiplicity of organizations involved in implementation as purely an administrative issue, it can also have significant policy consequences. First, although usually discussed as leveraging private actors to improve policy, the involvement of multiple actors may create conflicts that in the end may lessen the success of a program. Further, implementation involves making policy as well as strictly putting a policy into effect, so that the intentions of the legislation may be altered when being implemented by individuals and groups with perhaps different policy values. While some of this same policy drift may occur when implementation is entirely within the public sector the drift may be less controllable when being produced by private actors.

Performance standards

Somewhat paradoxically the increased use of performance management as a part of the reforms associated with the New Public Management may actually reduce the capacity to implement programs as intended by the formulators of the policies. The basic logic of performance management is that by establishing standards and targets for the organizations and individuals responsible for implementation that implementation will be improved (Bouckaert and Halligan, 2007). While that goal is well intentioned, it may set up situations in which the quality of programs provided actually diminish.

The difficulty in performance management is that when people have to reach targets they will find ways to reach them, regardless of the actual

effects on the intentions of the program (Radin, 2006). For example, if the police have a performance standard for clearing a certain percentage of reported crimes they may simply refuse to record some crimes that may be difficult to solve (Barrett, 2014). Or they may reclassify crimes as less serious so they can demonstrate that rates of serious crimes such as homicide are falling (Eterno and Silverman, 2012). And it is certainly not only the police who find ways to reach targets for implementation without actually implementing the programs as intended.

Street-level bureaucrats and implementation

Above we discussed some of the potential problems of drift in the implementation of public policies in general terms. Although there are a number of potential influences on implementation, the impact of the lower levels of the bureaucracy represents an especially important influence on the decisions that are finally made by governments. This influence highlights the point made above that the real policy of government (and its collaborators in the private sector) is the policy as it is implemented.

Despite attempts by legislatures and others who make law, discretion is always necessary in implementation. Indeed, legislatures may not want to write laws that are too precise and too detailed. They both lack the expertise in many (if not most) areas of policy but also are faced with social and technological circumstances that often change rapidly. Drug law enforcement makes this point rather clearly. Most countries outlaw the use of certain drugs, and place them on schedules of differing degrees of severity for punishment. This worked reasonably well until drug dealers found ways to alter a chemical compound slightly, making it outside the law but having the same effects as the illegal substance (McElroy, 2013). Lacking discretion to confiscate any drug that appears

harmful, enforcers must wait for new law.

The impact of the lower echelons of bureaucracy – the “street-level bureaucrats” – on policy is apparent in social policy and in regulatory policy. The term was coined by Michael Lipsky (1980) primarily in relation to social policy. He was concerned with the extent to which workers in social service organizations could bend the rules either positively or negatively and therefore advantage or disadvantage clients.⁸ His research, and a good deal of other research on the powers even of receptionists in social service organizations, indicates the extent to which clients may be vulnerable, and programs vulnerable to sabotage.

The lower echelon of workers in regulatory organizations also have substantial discretion in making decisions, and therefore a good deal of power. Research in a number of settings (Lundqvist, 1980; Bardach and Kagan, 1982, 2009) has pointed out that inspectors have a good deal of discretion in how they administer environmental and health and safety laws. Further, exercising that discretion is often key to the success of programs, as excessive rigidity in the rules may lead to inspectors ignoring violations that could have disastrous consequences for a regulated industry. The capacity to negotiate enforcement can lead to more effective policy implementation,⁹ although it may also result in deviations from the intentions of the formulators of the policy.

Just as the New Public Management mentioned above has tended to enhance the autonomy of agencies delivering public services, the “empowerment” strand of reform in the public sector (see Peters, 2001a; Fernandez and Moldogazie, 2011) has tended to give lowerlevel officials within organizations of all sorts greater autonomy to make their own decisions. Thus, a great deal of the change within the public sector over the past several decades has tended to delegate more and therefore to make implementation more difficult for legislatures and

political executives to control. This in turn means that policy outcomes for citizens are likely to be more variable, raising significant questions of accountability and even of democracy.

What is implementation success?

All the above discussions of implementation have discussed the process of implementation, and many, if not most, of these have described the outcomes of that process as failures. Indeed, most studies of implementation have emphasized failures and discussed how and why implementation fails. While those failures are often obvious, in many other cases they may be in the eye of the beholder. The question of implementation failure is important for understanding policy success and failure more generally.

Implementation failure is not just a simple empirical question, but rather the failure is related to the numerous theoretical approaches to implementation. If one adopts the top-down perspective then failure can be seen as a policy outcome that does not conform to the intentions of the initial policy formulation. If, however, one has a more flexible, bottom-up perspective then failure is more difficult to define, and also less likely to occur. These two fundamental theoretical approaches then are also potentially related to different approaches to measurement, in degree if not in type.

These alternative conceptions of success in implementation can be related to the fundamental issue of policy design. The more constrained top-down conception of implementation success is derived from the more rigid conception of policy design, assuming that initial design perspectives will be carried through the process. In such a view implementation failure implies a failure of the initial design. On the other hand, if one adopts a more argumentative perspective then the program may evolve more as it is implemented (but see Brown and Wildavsky,

1984). Rather than being set rigidly by decisions at the outset the policy inevitably adapts, with bottom-up implementation representing one dimension of that adaptation.

From either perspective, there is still not a clear measure of what would constitute failure. Even in the top-down perspective it is not clear how much drift constitutes failure. Any demand for perfect implementation of a policy would appear unreasonable, given the complexity of the process and the difficulties in affecting large-scale social and economic processes. On the other hand, simply saying that something happened, and perhaps something good happened, seems too weak a criterion to argue that implementation has been successful. Further, does one attribute success or failure to the implementation process or to the initial policy design? These difficulties then constitute a useful place at which to begin the final section of this book – the role of evaluation in the policy process.

Interventions and implementation

The title for this chapter includes the word “intervention”, although almost all the discussion until this point concerns implementation. Thinking about how to intervene effectively into ongoing social and economic processes involves design elements such as policy instruments, but may also require thinking about broader implementation strategies as well. These intervention strategies to a great extent mirror the implementation literature, with three broad conceptions about how to put policies into action in their socio-economic environment, and indeed within the political system itself.

The first and dominant strategy remains one depending on law and formal hierarchy to achieve policy goals. The foundation of the implementation literature is an assumption (unstated at times) that laws should, and could, be implemented perfectly with the intentions of the

framers of the legislation going into effect. Implementation in this context is assumed to be done primarily or totally by the public sector itself. The policy might still fail, but it would not fail because of implementation deficiencies. Especially in administrative and political systems that are highly legalistic, this conception of implementation persists, and the probability of perceived implementation failure is consequently greater (Hammerschmid and Meyer, 2004).

The second significant strategy for implementation emphasizes an understanding of the context into which a policy is being introduced. The fundamental idea of backward mapping is to understand the environment of policy and then design programs that will be most acceptable within that environment (Elmore, 1985). While this strategy may lead to greater implementation success, there is a clear question of whether it can produce policy success. That is, if the program is designed for easy implementation and for acceptability, it may not be capable of addressing the underlying problems it was meant to solve.

The backward-mapping approach to intervention also points to the potential danger of the term “feasibility” in policy analysis (Meltsner, 1972; Vanderbroght and Yamasaki, 2004). One almost sure way to defeat a policy proposal is to say that it is not feasible. That judgment of a lack of feasibility may be passed without any great analytic support, or it may be expressed in political rather than analytic terms, but in either case it is a rather facile means of defeating a program. While backward mapping may still lead to the adoption of a program, that program may be so watered-down that its success may be relatively insignificant.

The third approach to implementation is also concerned with context and the socio-economic environment of policy, but tends to use the social actors rather than to have policy necessarily shaped by them. The use of horizontal patterns of implementation involving networks and market actors may facilitate policy delivery, if not have policies shaped

ex ante by those socio-economic forces. Of course during implementation the social and market actors will almost certainly influence the nature of the policy as it actually goes into effect "on the ground". We should in fact expect more drift from the intentions of the framers of the legislation, an outcome that can be compensated for by the ability to leverage the resources of the non-governmental actors involved.

These implementation strategies may also be seen as broad strategies for intervention, and for policy design more generally. One version of policymaking would be an étatiste form of governing almost entirely through public sector institutions, using law and hierarchy for control over the society. An alternative could be seen as permitting self-regulation of the society with very loose guidance based on guidelines, frameworks and so on. And finally policy may be pursued through collaboration with social and market actors, attempting to direct those actors in the direction of legislative and administrative goals, but also recognizing the importance of the interactions between state and society.

However governments and their allies attempt to govern and to make and implement policy, it is not an easy task. The implementation literature has emphasized those difficulties and the significant probability of failure. That sense of failure, however, may be a product of high expectations and a legalistic frame of reference that assumes that there should be little deviation in the implemented programs from the formal law. But we are still left with little guidance in understanding what is adequate implementation, and when failure has indeed occurred. And further, despite the numerous failures in perfect implementation, there are still important successes and many policies do work.

Summary

If public policies are to mean anything they must be implemented. That is, however, easier said than done, and the history of the study of implementation is built primarily on the study of failure. That emphasis on failure is, however, perhaps excessively negative. Governments have been able to make programs work, and sometimes work very well, although few if any programs are implemented in exactly the manner in which they were intended. Thus, while failure has helped to bring scholarly attention to the issue of implementation in reality the outcomes are much more mixed.

The study of implementation also emphasizes the complexity of public policy. Whether the actors involved are public, private or a combination, almost all implementation involves multiple actors interacting in a variety of ways for the program to function. Recognizing the existence of these multiple actors in the process emphasizes the importance of discretion in implementation, and the extent to which policies may change during implementation as a result of that delegation. That change does not mean failure, but does invoke the need to evaluate what has happened and to use that evaluation to continue improving policy.

NOTES

- 1 This concern about discretion was in part sparked by administrative reforms during the latter part of the twentieth century that encouraged delegation and empowerment for lower echelon workers in government.
- 2 This concept is similar to the concept of "veto points" in institutional theory developed by Tsebelis (2000).
- 3 Ernst Alexander (1989) argues that Bowen's optimism is founded on a set of assumptions about the malleability of the implementation process that may be applicable in only a limited number of circumstances. His argument, and hers, are indicative of marked contrasts in views about the formality of public administration.
- 4 It in some ways conforms even more to patterns of policymaking in less democratic regimes in which the hegemonic party, or the individual hegemon, will expect his or her policies to be implemented without

question.

- 5 For example, most tax legislation is implemented by a single powerful organization rather than by multiple, dispersed organizations. That said, the private industry of accountants, lawyers and advisors that attempts to lessen the tax liabilities of individuals and corporations must be considered participants in the process.
- 6 For example, the EPA in the United States pushed back rather hard against the intentions of several Republican presidents to weaken environmental programs.
- 7 The level of control of the center does vary significantly within federal regimes (see Fenna and Hueglin, 2010).
- 8 For a very negative conception of this role of social service workers see Piven and Cloward (1993).
- 9 This acceptance of negotiation also becomes crucial for writing regulations, as "soft law" becomes more widely accepted. See Mörtz (2004) and Dahl and Hansen (2006).