Policy Implementation Approach

Necessity and approach building for Government Policy Operations

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Preamble

This discussion focuses on the government policies which are promulgated to further the causes of the government.

Today all the countries in the world are governed by different systems with a mix of democracies, monarchies and even dictatorial. For all those, policy is one of the most potent instruments to implement the vision and wishes of the rulers. For many democracies, be it liberal or conservative, it is the policy framework and its implementation that defines the character of a country. Similarly for the monarchies and single-party regimes, the vision of the rulers remains most prominent, and the policies envisaged and implemented by these rulers provide an indication of how that economy and society would progress. The policies that are implemented by governments go a long way in determining the future of the country. This puts an enormous burden on the policy framework to further causes espoused by governments. And even within the policy framework, the implementation of those remains the single-most factor to decide the outcomes of these policies.

Usually, the policy document makes a good reading and sounds noble on paper. Nevertheless, there are multiple and serious roadblocks or ways where the policy might not yield intended benefits. Hence, when it comes to implementation of such policies and the subsequent follow-ups, in absence of a proper approach, those may end up being a failure.

Because of this, implementation of a policy becomes crucial for it to yield the results desired. Multiple complicated aspects need focused attention to ensure the implementation progresses in the way desired. A policy implementation approach (approach, the approach) needs to consider multiple non-operational aspects too to ensure that the policy is successful within defined parameters.

Lot of academic as well as non-academic research and literature is available focusing on

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policy implementation. Many implementation models are provided with multiple perspectives to suit a specific condition. However, this research stops short of providing a comprehensive approach and accurate guiding framework for policy implementation. The existing research focuses on specific government sectors and focuses more from the perspective of a process, rather than holistic approach.

This article will attempt to build a normative approach to the policy implementation process.

Policymaking as a starting point

Normally, a policy is a result of finding a solution for any pressing issue. Governments promulgate policies to benefit national entities, such as citizens and businesses, or the government itself. These policies can also work to clear out anomalies in society or even to create new areas where the citizens would benefit from. The purposes of policymaking can be many, and the details can be discussed separately. Key areas for policy would be defense, trade, financial markets, monetary, welfare, agricultural, industrial and other niche areas. These are set and modified from time to time.

The policymaking process involves conducting studies of the current environment. These studies focus on issues and provide suggestions on how a new policy or amendment of existing policy can change the situation for the better. Post extensive research and deliberations, the policy draft is presented to the decision makers. After review, assessment and then

The Policy Process

- Prior Research and Data Gathering
- Text Preparation and Approval
- Implementation Approach
- Policy Rollout
- Policy Operations

agreement to the proposed approach, governments approve the promulgation of the policy. For governments, it can come in the form of a new law or an amendment to the existing law or simply a notification of rules and regulations. Normally, the policy document is a high-level document, bereft of any implementation methods or any other operational details. What those documents certainly have is a statement of intent, how the government wants to pursue it and what it expects as a result. Some policies run in continuum such as foreign policy, which do not have end-goals. Some other policies run for a set period, such as distribution of welfare to mitigate any natural disaster.

The role of policy implementation approach begins here. This forms a vital link between policy document and its intended rollout. This article proposes a holistic approach to the implementation of policies, to cover both material and non-material aspects. The next section will elaborate how this approach should be built and which components should be part of it. The approach should not limit itself to operationalizing the policy, but also consider political, financial, behavioral and international impacts as well.

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The approach

While framing the approach, the following aspects should be considered at a minimum. As mentioned previously, the approach needs to consider both material and non-material aspects. The factors mentioned here can intertwine and overlap as the implementation is a cohesive process and all aspects of the rollout impact all the facets. However, for ease of understanding, each subsection will deal with different facets.

With reference to the top-down or bottom-up approach to policy implementation, it will be very difficult to aim only for a unitary approach. The policy needs are to be derived from bottom-up while the policy formation and its implementation need to be top-down. In the top-down approach, with the policy goals being clear to all, it becomes easy to pinpoint areas which would need augmentation to be able to deliver the policy successfully.

This discussion touches upon all the relevant aspects at a high level. However, as it is clear, there are multiple smaller and niche aspects which play crucial roles in policy operations, depending on the type of policy. The approach, thus, needs to focus on all relevant large and small aspects and factor those in the documentation for rollout. Essentially, the more comprehensive and detailed approach, the better and successful policy execution will be.

The sub-sections below take a somewhat linear route in terms of sequencing to assess, elaborate and factor in the implementation aspects.

Conflicts with Existing Policies

The policy promulgation is expected to address potential impacts the existing policies might have. Many times, the policy text can simply say that previous versions of the same policy stand nullified, if the current policy is liable to change frequently. If the policy text misses out on addressing the conflicts, the same should be considered as a priority. The conflicts can range from impeding policy implementation to totally negating the current policy targets. The policy document, or otherwise the approach should consider measures to address any conflicts with other policies in operation. This includes evaluating which areas or which class of beneficiaries would be adversely impacted.

It is important to note that while forming policies, the initial research and deliberations would have evaluated such aspects in detail and have formed an adequate redressal mechanism. The initial research would come in handy for the approach and can be directly incorporated as such. If this is not the case, then a detailed analysis of the impacts resulting from conflicts should be done.

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The mitigation should cover diluting the policy measures or abandoning/modifying the previous policies. There might be ways where the conflicting policies can co-exist with certain
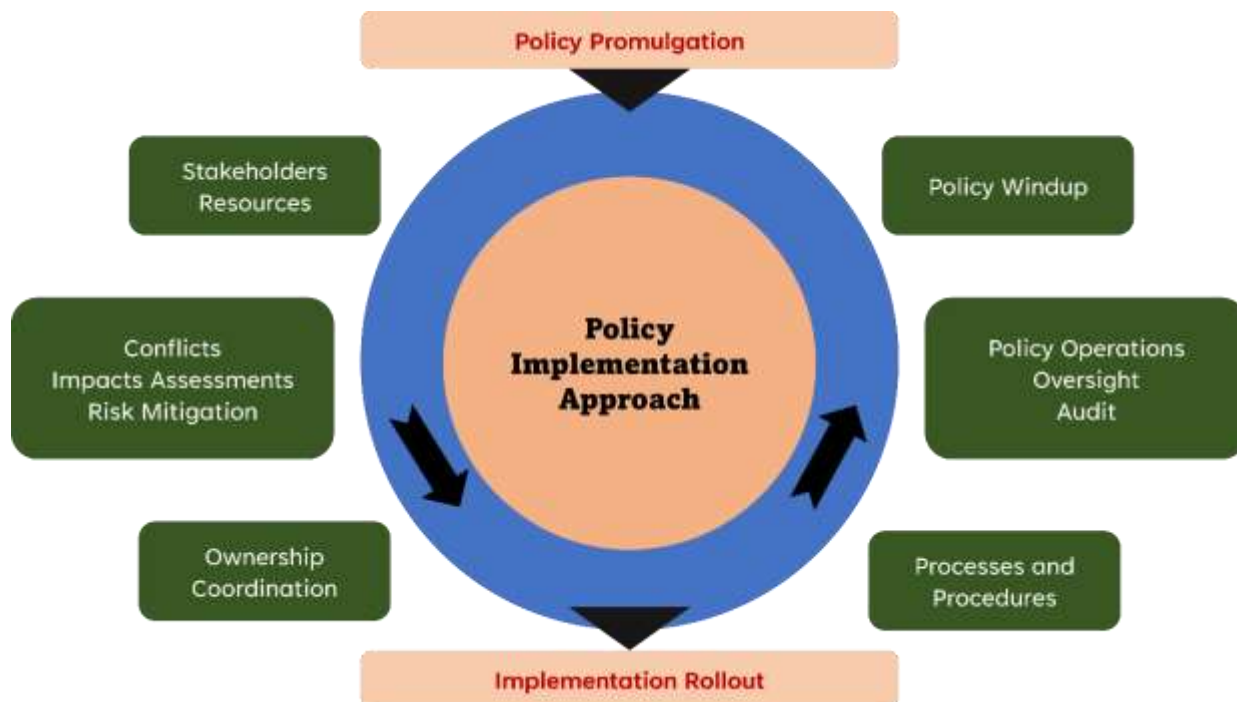
modifications done to both to ensure they do not encroach upon each other. In addition, policies which are in operation and are impacted indirectly due to current policy implementation should also be evaluated for any changes. For example, if a policy of providing unemployment allowance is announced, it might have an indirect impact on the policy to promote micro-businesses. Such conflicts should be studied in detail with what-if scenarios. An action plan to ensure both policies reach their end goals should be prepared. This can include diluting measures of existing policies and/or the new policy right up to nullifying the existing policies.

Stakeholders

A policy is characterized by multiple facets, one being the stakeholders of different types. The department/agency which is expected to implement such a policy would be the primary delivering stakeholder. Other departments, agencies, individuals, and contractors who would help the implementing agency, would also be delivering stakeholders. Another obvious stakeholder type is the beneficiary stakeholders, which can include a class of society or business, or institutions or the government itself. The beneficiary stakeholders can have multiple indirect beneficiaries. For example, free food programs might have poor citizens as primary beneficiaries whereas the businesses involved in production and distribution of food can be indirect beneficiaries. The indirect beneficiaries can also become part of the delivering stakeholders in some cases, when they set up infrastructure to deliver the benefits intended by such policies. The last type of stakeholders is impacted groups, which may have negative impact of implementation of such policies. For example, in a tax policy where taxes are raised, the government becomes beneficiary whereas that taxpayers become impacted stakeholders.

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While planning a roll-out of such policies, care should be taken to study all the stakeholder types and ways they would receive the policy in operation. Again, among the stakeholders, the approach needs to consider not only material aspects, but also behavioral aspects such as vested interests, unmet expectations, political resistance, internal favoritism, bureaucratic delays etc.

Stakeholder management, thus, becomes an important aspect of the policy implementation process. A deeper and objective study needs to be carried out to ensure all or at least most of the concerns of these stakeholders have been addressed adequately. The rollout approach should enumerate all these stakeholders and document the impacts on them, with a mitigation plan for any adverse impacts.

Resources

Resourcing is another facet of the policy rollout. Any policy implementation cannot take off without adequate provision of all resources. Those include human resources, institutional resources, material and contractual resources and the funds to support all these aspects. Human resources acquisition might include dipping into the employees of all stakeholders or contracting agencies to provide skilled manpower to ensure there are no understaffing issues. The institutional resources would include infrastructure and logistics provision, public relations and administration services, among others. Material and contractual resources cover the aspect of any material required and the ways to ensure the requisite quantity is available should the policy in question refer to the same. Contractual resources are those which are required to build necessary infrastructure or provide technical assistance and support.

Finally, the most important aspect of resourcing is availability of financial resources. Most of the policies are related to the finances in one way or the other. Financial resources should be inspected at two levels – policy rollout and policy operations. At the time of policy rollout, most of the stakeholders are activated and plans are drawn up for implementation. All the prerequisites for such operations may need funding and the approach should consider provision of adequate funds for this activity. The government department/entity responsible for the rollout needs to have adequate funds to ensure appropriate rollout. Same consideration should be made for policy operations, wherein all the resources are maintained at desired levels, be it salaries, fees, maintenance and operational charges, which need to be paid during the policy operations. These

operating expenditures should be adequately provided for. Funding for the same should be made available at appropriate times, during the life of policy operations. On the next level, in case the policy goal itself is to distribute money in any form, the provision of those funds would be a mandatory aspect of securing financial resources. In some policies, financial arbitrage plays a part and thus the delivering stakeholders need to make sure the cyclical mechanism is well established to deliver to the beneficiaries. In cases where the government itself is the net recipient of the money, the resourcing might not have a big role, but the deployment and investment of those funds should be factored in, within the approach. In all the financing related resourcing, the timeline of financial needs and availability of the same need to be plotted in a clear roadmap, including any loans or bond sales at appropriate times.

Impact Assessment

While building an approach to policy implementation, another important facet is to understand the impacts – both positive and negative – on the overall set of stakeholders. The impacts of policy operations can potentially create unintended anomalies in society and in the financial system, which need to be identified and addressed.

There are at least three dimensions of impacts. One, if the impact is positive or negative. Second, if the impact is direct (on the stakeholders) or indirect (on those not directly connected with policy operations). And third, if the impact level is immediate/primary, secondary or tertiary.

Any policy is capable of producing impacts that can be either positive or negative. The benefits from positive impacts should be enumerated in this approach. At the same time, the negative impacts should be assessed to be minimized to the extent possible by modifying the rollout appropriately.

While the policy is meant to impact the direct stakeholders, it might have sometimes unintended impacts on other sections of society which are not directly related to policy operations. For example, a tax-break policy, which is meant to reduce taxes would have a positive impact on taxpayers. However, non-taxpayers, who are not direct stakeholders, might suffer because of less welfare money distributed to them in case the government revenues fall significantly, thus experiencing a negative impact.

On the multiple levels of impacts, such as primary impact, secondary impact, tertiary impact and so on, the approach should assess to quantify these impacts. A secondary impact on beneficiary stakeholders might have an adverse impact on other set of stakeholders, which may or may not be part of the policy operation. An example of this would be to say a policy is promulgated to disallow high-risk instruments from financial markets that would make a normal investor feel safer. However, the savings would increase as a result and the investors might turn to other riskier or safer assets which cannot be predicted for certainty. The impact assessment should study such areas which might benefit or influence the secondary impacts. As is evident, these impacts may end up overlapping with each other. However, all these types of impacts need to be assessed and factored in the approach.

The impact assessment should cover not only the focus sector of the policy, but other dependent or related sectors. Once these studies are done, appropriate sub-sections should be added to the

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policy to mitigate any adverse impacts and should also form a part of the implementation approach to operationalizing policy.

Risk Mitigation

As mentioned earlier, the risks for policy implementation and operations do not come only from the identified components. Till now the discussion has covered the conflicts, stakeholders and resourcing as direct or material aspects which can derail policy rollout. In addition to these direct components which bear inherent risks of non-availability or non-performance, there is another segment which is equally important. These include non-material or behavioral risks. There are multiple and hidden reasons why a well-drafted policy might fail due to non-operational aspects such as:

- The ruling dispensation has agreed with the policy to meet some external expectations but might not be committed to its success.
- Many times, the policy, due to fear of resistance is garbed as something different while the underlying cause for policy is different. Since this is not widespread knowledge, the stakeholders might misdirect the policy towards ineffectiveness or even failure.
- The bureaucratic machinery is either not geared up or not interested in implementing policies as it might not bring them any benefits. Alternatively, they may fear that the policy might run against their inherent biases or gains or there is a fear of job loss on a large scale.
- Inadequate legal support may lead to the policy being a failure with multiple stakeholders exploiting the legal system to extract more than desired from the policy.
- The corporations and businesses are not in favor of such policies and would like to demur or even sabotage by working on the loopholes.
- The section(s) of society which are beneficiaries have different expectations from the actual policy and thus protest and try to dismantle policy goals, making it ineffective.
- International pressure groups which do not subscribe to such policies being implemented can bring pressure on the executing entities or bribe them to ensure that such policies are not implemented or if implemented, are not run properly to deny their success.
- Inadequacy of institutions or institutional lethargy might not help in achieving policy goals.

These are just a few reasons why policies might not bring in the results those were intended to, but many such intricate machinations may make the policy less than a success, if not addressed to.

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Depending upon the policy under implementation, all the risk factors can vary on a large scale, and thus the roll-out model should be able to account for these anomalies in one specific chart/document to ensure their coverage.

The approach needs to cover all these aspects to find any loopholes which can be exploited, aspects which might encounter resistance or sabotage. All these should be identified beforehand and incorporated in the approach for adequate mitigation. Though full protection might not be achieved from these non-material risks, the approach can build necessary firewalls to ensure that the rollout and operations are not impacted by these behavioral aspects.

Ownership

There are a few tenets which need to be established during the policy operations, as part of the approach for rollout. One of those is ownership. There should be a clear owner of the policy operations or a very small team which would bear the responsibility of the policy success or failure. Here ownership can be spread across multiple departments or ministries based on the type of policy. The owner(s) (hereinafter, the owners) should thus be taken from all the relevant entities which have a major stake in policy success. The oversight mechanism as well as the audit would be available at the disposal of owners, and they are expected to take appropriate decisions when it is time to do so. This ownership should also be published downstream so that all the stakeholders have an entity which can be approached to point out any aspects of policy operations which are not performing to the expectations. Ownership comes with a discretion to ensure accurate decisions are taken at an appropriate time. Even in this case, the ownership is to be tasked with a clear mandate along with checks-and-balances to ensure the decisions are taken at the right time to ensure policy success. The owners should also be enabled with appropriate punitive actions should an erring entity is found out to be repetitively underperforming or sabotaging the policy operations. Quantum of such punitive actions should be determined as part of the approach and communicated to the delivering stakeholders.

Coordination

Coordination is another important aspect which should be the mainstay of such an approach. This should ensure that all the stakeholders, direct or indirect, are accounted for and their interactions with the policy implementation and operations at different touchpoints. The coordination mechanism, touchpoints and task ownerships should be clearly documented and available to the

relevant entities. This is the place where the hidden negative attributes can be addressed. For example, if a policy is designed in such a way that it impacts negatively to a department or a ministry in government. The negative impacts might be losses to its importance or any material value such as human resources or budget. This entity would not be very enthusiastic to implement such policies. In these cases, the impacted and adversarial department should not be accorded with task level decision-making authority which might impede the implementation.

The coordination factor within the approach should be built in such a way to have a higher authority to address any impedances in the policy operations. Care should be taken to ensure there are checks-and-balances built within the approach to roll-out. Another way would be to remove the erring agency from any decision-making process and allow any other responsible entity to do the needful. As this suggestion, though important, is quite fluid, care should be taken to ensure that the implementation and policy operations continue without any hindrance. This can be accomplished by the policy owners and having authority on decision-making over and above other stakeholders.

In addition, the coordination function should also have clearly demarcated endpoints which would help in ensuring the responsibility attribution to different stakeholders with a specific outcome and time-based task/activity being completed. The owners should be tasked to conduct the coordination themselves or have another small team with representatives in all the delivering entities to carry out the same.

A necessary part of the coordination would be communication or messaging. In any policy operations, constant and appropriate communication helps a lot in ensuring successful delivery. The messaging aspect also can be determined at a high level in the holistic approach for routine communication on the policy progress and encouraging all the stakeholders to participate according to their roles. This should also include ad-hoc communications through letters or meetings to appraise the stakeholders of any issues. Any mid-course corrections or crisis-aversion should also be part of the messaging as and when required and this messaging should come from the policy owners.

Processes and Procedures

Beyond these high-level aspects, the approach should have a detailed operational plan including high-level work breakdown structure as well as detailed work breakdown structure. The concurrent and dependent activities should be clearly marked and the readiness for these aspects should be determined prior to the rollout. A dedicated program management team should be able to monitor the progress based on detailed tasks and their owners to ensure the policy rollout happens as decided. It should also cover onboarding of resources such as additional manpower, funding as well as external entities such as contractors to ensure full alignment. The operations plan should be as detailed as possible with a comprehensive program plan and swim lane diagrams providing a clear and concise picture of how the program is to be implemented and the roles of all stakeholders within the plan.

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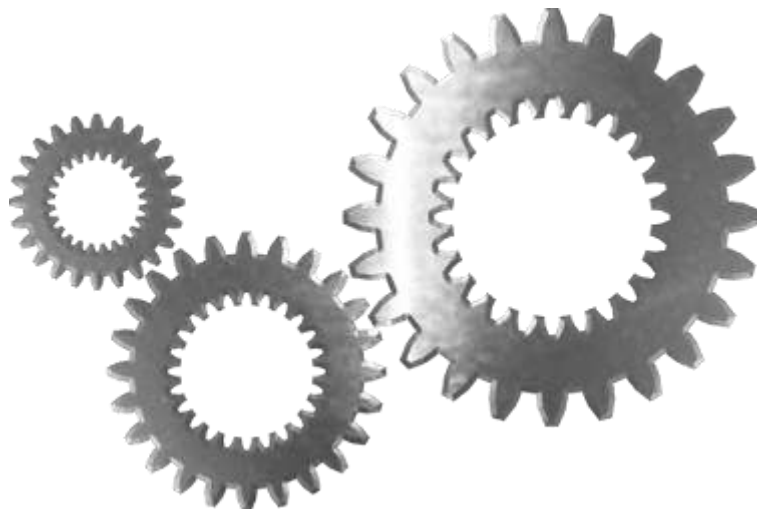
Coming to the brass tacks, the approach should work on setting up appropriate processes and procedures within the operational aspect of policy implementation. Once all the above-mentioned framework is set up and put in place, the approach should build on the processes which would be part of the operations. Again, here the approach should ensure that correct checks-and-balances are in place and there are minimum or manageable interactions between different stakeholders within the tasks-activities chart. For each important or vital task completion, the approach should suggest appraisal to the owners so that any roadblock within these interactions is removed swiftly. The processes should also be spelt out with clarity including task owner, task inputs and outputs, task escalation and bypass if any.

On even granular level, the approach should set up procedures within the tasks. In case the tasks belong to a specific department/entity in their entirety, then the set of procedures can be borrowed from the same entity and examined for its suitability for the policy operations. If any of the procedural aspects need to undergo a change, the same should be done in coordination with the entity.

It is necessary to focus on these minor but important aspects to ensure the processes and procedures are aligned to the overall policy operations. The approach should consider all aspects of ensuring smooth delivery within the policy operations, while acknowledging threats and inefficiencies in the entire operations while mitigating those within the process parameters.

Policy Rollout

All the above aspects should be made a part of the implementation approach and assimilated by the delivering stakeholders. Once such an approach is prepared and actioned where necessary, the actual policy rollout should begin. The rollout actions should follow what is mentioned in the approach to ensure accurate steps are taken to set up the policy operations framework. The rollout should activate the setting up of delivery structures such as availability of resources, setting up ownership and coordination teams and engaging all stakeholders with appropriate messaging.

Policy Operations

All the above discussion was primarily addressing the aspect of the plan rollout. Once the rollout happens, the next and crucial aspect would be the operation of the policy or its actual run, considering all the prerequisites are met.

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As the policy owners take charge of the oversight mechanism, considering the micro details of operations, the owners may decide to task the oversight activity to a different team. Thus, the oversight can be by a dedicated team looking at all the coordination aspects and ensuring a smooth process flow with respect to the policy delivery. This oversight also should be able to regularly assess the policy delivery and measure the success or failure of the policy in terms of the targets it is intended to achieve. Should there be any course correction required, then oversight mechanism should be empowered to make suitable changes in the process flow or other aspects such as stakeholder engagements or modifying the policy targets, as deemed necessary. It may also happen that the policy operations would need more human resources, materials, or funds to ensure smooth continuation. Even if these aspects should ideally be factored into while deciding the implementation approach, such mid-course requirements should be analyzed by the oversight mechanism and the same should be able to augment the resources.

Some policies are intended only for a specific period. In such cases, the care should be taken to have a periodic review of the policy outcomes till the end of its intended period. Some cases might need an extension to the periods. Such cases should be determined by the oversight mechanism and appropriate recommendations should be made to the policy owners/approvers.

Audit and Mid-Course Corrections

In addition to the oversight, there should be a mechanism to audit the policy operations independently to enable another checks-and-balances mechanism. This audit should review the rollout plan and all the outlays and processes to determine if the same are being followed to the extent required and raise objections if some of the aspects do not meet required standards. The audit results should be provided to the implementation owners so that this can help them to take corrective actions quickly to ensure that the policy implementation is brought back on track, if so required.

In addition, the stakeholders themselves might be able to raise concerns about any specific operational segment which might not be performing as per expectations. This highlighting should be communicated to the oversight team or the owners for a quick course-correction.

Another important factor within policy operations would be the fact that a new policy is announced which will have an adverse impact to the current one. In such cases, policy owners should consult with relevant entities to determine any modification in the policy operations to mitigate any adverse overlap. In some extreme cases, the current policy might be required to be wound up. Such decisions are to be taken by the owners after discussing and recording the opinion of competent authorities. Communication to all stakeholders should be circulated to announce any changes in policy operations or their end.

Winding up

Once a policy reaches its declared end date, or it is decided by the competent authorities to end its operations, the winding up aspect should be activated.

A clear communication, with an action plan for winding up should be circulated by the owners or any other higher competent authorities. Depending on the complexity of policy operations, the

winding up can be done as a single activity or in phases. The phases should move on the time scale of releasing redundant resources and gradually moving to the more important resources. The material, institutional, and human resources should be released which are no longer needed for policy operations. Contractors and agencies should be deployed to dismantle any structures specifically built with policy operations in mind. All financial and non-financial settlements should be carried out to square the books. Once all the resources assigned to policy operations are released, he owners should make an announcement of policy wind up.

It is possible for some operations to have lingering actions such as grievance redressal or contractual obligations. The policy owners should identify such aspects and deploy necessary human and institutional resources to fulfil those responsibilities.

In a nutshell

The holistic approach should be able to consider all the practical, physical, and behavioral aspects to ensure that the policy operations yield the desired results. The holistic approach should be the first step in rolling out a policy once it is approved. The approach should build a detailed rollout document with plans, stakeholder engagements and ensuring other monitoring structures are in place with additional focus on onboarding external entities, ensuring adequate human resources and funding for the policy rollout.

It is possible that the approach may bring out some limitations or additional considerations which may change the nature and structure of the policy itself. This is necessary to be addressed even before the policy rollout begins, to ensure a successful policy operation. A policy with minor depletion of intended goals implemented successfully is much better than a policy in its original form without any considerations of practical difficulties failing due to the stricter adherence.

This article has enumerated many high-level aspects of the policy implementation process, considering the broadest government policy aspects. However, due to nature and variety of policies and the governance system variations, each policy needs to be given a specific treatment with respect to its implementation and operations. This article touches bases on the common factors at a high level and leaves multiple smaller and crucial factors specific to the policies at hand to be treated granularly. Further articles will review such topics in detail and contribute to building an even more detailed approach.