Issues in GOVERNANCE STUDIES

Number 32 February 2010

But Will It Work?: Implementation Analysis to Improve Government Performance

R. Kent Weaver

EXECUTIVE SUMMARY

© Reuters/Kevin Lamarque.

Problems that arise in the implementation process make it less likely that policy objectives will be achieved in many government programs. Implementation problems may also damage the morale and external reputations of the agencies in charge of implementation. Although many implementation problems occur repeatedly across programs and can be predicted in advance, legislators often pay little attention to them when programs are being enacted or overhauled. This Issue Brief argues that the United States should adopt a program of Implementation Analysis for major legislative proposals in Congress. Implementation Analysis would be administered by the Government Accountability Office, and would draw on the Congressional Budget Office's experience with budget scoring of legislative proposals. The Brief outlines major elements of an Implementation Analysis and argues that it could lead to major improvements in policy performance. Although Implementation Analysis would encounter both political and administrative obstacles, these obstacles are manageable.

Recent Issues in Governance Studies

"The Climate of Belief: American Public Opinion on Climate Change" (January 2010)

"Continental Climate Governance Challenges for North America" (December 2009)

"Should Increasing the Progressivity of Entitlement Benefits be Part of a 21st Century American Social Contract?" (November 2009)

"Polarized Post-Partisan Politics? (Or Just Politics?) (October 2009)

To view previous papers, visit: www.brookings.edu/governance/Issues-in-Governance-Studies.aspx

Implementation is critical to policy success in policy sectors ranging from homeland security to health care to welfare reform to climate change policy. The literature on policy implementation identifies a number of potential problems that may arise in the implementation process. Failure to anticipate implementation problems when a policy reform is being enacted may lead to failure to achieve programmatic objectives, excessive costs, and perhaps even a political backlash against the implementing organizations and policies.

R. Kent Weaver is a senior fellow in Governance Studies at The Brookings Institution and Professor of Public Policy and Government at Georgetown University.

Despite the high stakes in policy implementation, potential implementation problems in policy initiatives rarely receive *sustained, systematic, detailed* and *visible* attention before a decision is made on those initiatives. In part, this is because there is no simple and generally accepted methodology for performing such an analysis that falls within the skill set of a single profession and that can be reduced to a single indicator which policymakers can use (or misuse) easily. In part, as will be discussed below, it is because politicians supporting a program have few incentives to point out potential implementation problems during the legislative process. To address these problems, this issue brief lays out a set of common policy implementation problems that can be observed in a wide range of policy sectors, as well as a framework for organizing a systematic Implementation Analysis (IA) and a set of potential strategic responses to potential implementation problems identified by that analysis.

The most important advantage of employing a systematic framework for Implementation Analysis is the same as the advantage that Eugene Bardach argued in his classic discussion of a structured approach to policy analysis: "it reminds you of important tasks and choices that otherwise might slip your mind."[1] Even though Implementation Analysis does not provide a complete "cookie cutter" methodology for all types of proposals or a single quantitative indicator of a proposal's feasibility, having a checklist of standards and concerns that can be applied when a policy proposal is being considered can highlight potential trouble-spots early in the policymaking process and improve government performance once an initiative has been enacted. Thus it can provide information that is useful not only in deciding *whether* to implement an initiative but also *how* to do so.

Sources of Implementation Problems

Implementation Analysis requires careful attention to particular national and sectoral implementation contexts. The attached Table 1 shows problems that are likely to be highlighted by Implementation Analysis. In addition to providing a "checklist" of potential implementation problems, I suggest some "warning signs" of where those problems are most likely to arise and specific strategic responses that can be incorporated into the policy design and political ratification process.

Interpretation Issues

A key role of Implementation Analysis can be to identify areas where substantial ambiguity appears to exist, along with some potential consequences of that vagueness. Legislators can then choose whether or not they want to address that ambiguity.

In some cases, policies and programs are legislated with many key elements left indeterminate. This may occur for several reasons. Policymakers may not feel that they know enough to dictate more precisely to implementers, and they want to give the latter discretion to respond to changing conditions or to emerging experience. They may also simply be unable to agree among themselves.

Leaving legislation open to later interpretation can also have costs: it can lead to substantial lost time and energy as implementers argue about how ambiguous objectives and organizational mandates should be interpreted, especially when multiple steps and implementing bodies are involved.[2] It can also lead to "mission drift" as implementing officials or political executives seek to turn the organization's mission toward their own objectives. It is certainly beyond the scope of Implementation Analysis to resolve all legislative ambiguity before enactment. Nor should it — some degree of ambiguity in the legislation setting up a program may be useful, and being too specific in legislation can remove leeway that is needed for the implementing organization to adapt to unforeseen developments. But a key role of Implementation Analysis can be to identify areas where substantial ambiguity appears to exist, along with some potential consequences of that vagueness. Legislators can then choose whether or not they want to address that ambiguity.

Organizational Mission Issues

Researchers have long noted that over time organizations tend to develop a distinctive organizational culture and "mission"— a broadly shared set of goals and beliefs that not only shapes what the organization does but allows it to minimize communications costs and incentives and monitoring to control the behavior of its rank-and-file personnel.[3] The Social Security Administration (SSA) in the United States, for example, developed a client-serving ethic in its early years that stressed making sure that beneficiaries get what they are entitled to in a system where benefits are awarded as a matter of right. This sense of organizational mission was threatened, however, when SSA was given responsibility for new programs that required them to administer a means test (Supplemental Security Income) and decide who was "disabled enough" (SSI and Social Security Disability Insurance) in accordance with "complex court rulings and ambiguous claims."[4]

Bureaucracy scholar James Q. Wilson has argued that organizations may fail to give adequate attention to tasks that are not a good fit with that organization's "mission," or they may experience a long learning curve in learning how to do so effectively and uniformly. When new programmatic tasks are required by a policy proposal, program designers should not assume that an agency that has been successful at administering one type of program will necessarily welcome or be good at administering another type of program, even if the agency's political leadership assures policymakers that they can do it: those officials have few incentives to admit organizational weaknesses, even if they are aware of them. In deciding how to implement a new policy or program, policymakers need to consider the mission as well as the organizational capacity of potential implementing organizations, and consider whether it makes most sense to create a new implementing agency or, if they work through existing organizations, changing organizational leadership or structure to send strong, clear signals about the importance of the new organizational task. By pointing out potential conflicts between established organizational missions and new tasks, Implementation Analysis can help to inform those decisions.

Organizational Coordination Issues

Many reform proposals require new forms of cooperation between existing organizations. The desire of existing agencies and their political patrons to protect their "turf," jobs and constituencies sometimes leads to allocation of responsibilities for program implementation that reflects realities of the distribution of political power more than what is required for efficient and effective administration. In addition, program structures that require multiple approvals by agencies with very different objectives may lead to stalemate and inaction. Poor coordination mechanisms between multiple implementing agencies may lead to breakdowns and delays in program delivery, bureaucratic "runarounds" and other forms of poor service, as well as cost-overruns. Implementation Analysis can identify the "supply chain" of program decisions needed to set up a new program or alter an existing one, as well as to provide routine delivery of services once those changes are made. Past experience with the program being analyzed or comparable programs can be used to identify potential troublespots where cooperation of several organizations will be needed and where obtaining that cooperation may be problematic. Based on this analysis, Implementation Analysis can also suggest ways to simplify program management to limit or improve management of inter-agency coordination issues, while keeping in mind that some degree of organizational specialization and inter-agency coordination are unavoidable.

Resource and Organizational Capacity Constraints

As noted above, politicians tend to focus on the objectives that they want to achieve, while viewing implementation as someone else's problem. Moreover, they want to achieve their objectives with a minimum outlay of resources, and they may view executive claims of the need for more resources as empire-building by budget-maximizing bureaucrats. Thus program implementers often lack the time or the human, organizational, technology or financial resources needed to achieve program objectives. There are two aspects to this issue: *organizational capacity*, which involves building and retaining a critical stock of hard-to-acquire-and-replace resources such as specialized expertise, capital equipment and reputation, and a *resource flow* of funding and other program inputs that are used in the short-term. Given their large up-front costs and long-payback times, obtaining funding for large capital investments (e.g., investment in computer and radar equipment for air traffic control) is likely to be a particular problem for many agencies. A realistic assessment of the stock and flow of financial, human capital and technological resources needed for effective implementation of specific programs, and a comparison of that assessment with the allocation proposed in legislative proposals, should be a major focus of Implementation Analysis.

Timeline Issues

Timeline issues are closely related to resource and organizational capacity issues. Even where the needed human capital, technology and other resources required for successful implementation can be financed and acquired, it takes time to put all of the needed systems in place and make sure that they work effectively. Once politicians decide to act on a problem, however, they generally want immediate results for electoral credit-claiming purposes, and they tend to underestimate organizational and resource challenges associated with policy change. This is most likely to be a problem when policy reforms lead to the creation of entirely new organizations that need to be staffed and develop their own procedures. One important role for Implementation Analysis is to help policymakers develop realistic timelines to guide implementation of policy reforms.

Political Interference Issues

Implementation issues may arise not just within or among implementing agencies, but also from the "political masters" of those agencies—political executives and legislators. Politicians may be sorely tempted to intervene in agency decision-making for electoral reasons, either before the agency has made a decision or overturning it after the fact. The temptation to do so is likely to be especially strong if an agency makes a decision that is unpopular, an election is in the offing, and incumbent politicians are likely to take the public blame for the agency decision.

Sometimes politicians deliberately set up an "arms-length" relationship with an implementing agency to prevent political interference that they know will be a temptation to later politicians (or even themselves). They may, for example, contract out program operations or give implementing agencies independent boards. However, there are very few insulating arrangements created by politicians that cannot also be undone or modified by politicians at a later date if they are determined to do so. Implementation Analysis can identify programmatic arrangements that pose particular risks of political interference and suggest mechanisms to insulate decisions from political interference where it is appropriate to do so.

Implementation Analysis can identify programmatic arrangements that pose particular risks of political interference and suggest mechanisms to insulate decisions from political interference where it is appropriate to do so.

Program Operator Issues

Even when a program's leadership supports a reform and desires its full implementation those who actually deliver program services to clients (variously referred to as "program operators," "front-line workers," or "street-level bureaucrats")[5], may implement the program in ways that at least partially supplant the objectives of program designers with their own. Indeed, the literature on bureaucracy contains a variety of conflicting images of program operators, including:

- Saints —bureaucrats who are doing the best that they can under difficult working conditions
- Shirkers —bureaucrats who avoid doing work whenever possible
- Subverters — bureaucrats who substitute their own objectives for those of the "principal" or outcomes being measured
- Shackled —bureaucrats who have good intentions but constrained by rules and red tape from being innovative and serving program clientele in ways that respond to individual needs
- Rent-seekers —bureaucrats who use their position for personal gain (e.g., embezzlement, bribe-taking, or petty theft)

That all of these images of program operators co-exist reflects the extraordinary variations that program operators face in their working conditions, job security, discretion in performing their duties, professional norms, performance monitoring, and risk of sanctions for non-compliance—as well as variations across individual program operators. Program operators may use discretion to make their jobs easier to perform—e.g., managing overwhelming workloads or difficult clients—rather than advancing program goals. Physicians, for example, may practice "defensive medicine" to lessen the prospects of malpractice suits or to benefit economically from providing a higher volume of services. Obviously, this is likely to be more of a problem where substantial discretion by front-line workers is inevitable (like police officers), and where the behavior of program operators and policy outcomes are difficult to observe and control. To minimize problems of "unsaintly" behavior by program operators, it is important that the program operators be given clear guidelines, that the goals of program operators be aligned as much as possible with those of the program, and that their performance in meeting those objectives be measured, monitored and rewarded or sanctioned. Implementation Analysis can be helpful in identifying areas where the behavior of front-line workers may be problematic and suggesting ways to address those problems.

Target Compliance Issues

Even where resource constraints and the behavior of front-line workers and other types of principal-agent problems are not a problem, the "targets" of government policies may fail to behave in ways that were anticipated by the designers of that policy and that are necessary if the policy is to achieve its objectives. For example, banks may not increase lending in response to a financial bailout, low income mothers in a welfare reform initiative may not move into work at anticipated rates, commuters may reduce their use of public transit in response to a fare increase more or less than expected, and workers who need to change their savings and labor supply behavior in order to maintain anticipated retirement income in response to Social Security cutbacks may fail to do so. The failure of program "targets" to respond in ways that are intended and preferred by designers of a policy initiative can have several different roots, which call for distinctive adaptations by policymakers.[6]

Incentives that are insufficient to induce compliance are probably the most important source of non-compliance. For example, workers in an individual account pension system may not make a choice of pension funds if they have a default option that is perceived to be as good or nearly as good as the options available by making an active choice—i.e., when the perceived benefits of compliance are low. Compliance may involve costs—e.g., the bureaucratic hassles of applying for means-tested social benefits if the benefits are high while benefits are low.

Another set of problems with incentive structures has been highlighted by the burgeoning field of behavioral economics.[7] Rather than seeing people as rational, efficient and well-informed calculators of their own self interest, behavioral economics recognizes that individuals are often ill-informed, guided by inertia, and prone to follow the "path of least resistance" (especially when deviating from the status quo involves complex decisions). They are also more sensitive to losses than gains of equal value, sensitive to the opinions of others (even those they do not know), and prone to follow the herd.

Even a well-designed incentive structure may fail to secure target compliance, moreover, if it is poorly monitored and enforced. Targets may also fail to comply because they lack information needed to comply with policy. They may lack the human capital, money or other resources needed to respond (e.g., low-income persons who do not purchase health insurance even when it is heavily subsidized). And they may simply have hostile attitudes or lack trust in the government in general or the program specifically.

Even a well-designed incentive structure may fail to secure target compliance, moreover, if it is poorly monitored and enforced.

Each of these barriers to target compliance clearly calls for a different strategic response. Information shortages and inertia may be addressed, respectively, by providing targets with more information and by simplifying the choice sets so that targets don't need so much information. Incentives can (at least in theory) be adjusted to provide bigger carrots or sticks as needed. A thorough Implementation Analysis that identifies potential sources of target non-compliance and suggests potential response can help to make a program more successful in achieving its objectives.

A Framework for Implementation Analysis

As the discussion above suggests, a lot of things can go wrong in the policy implementation process. An analysis that treats the implementation challenges outlined above as its centerpiece rather than as an afterthought (or not at all), can play a very fruitful role in improving the quality of policy reform proposals. But Implementation Analysis is both analytically and politically difficult. By its very nature, Implementation Analysis of a policy that does not yet exist (or that has been proposed for substantial modification) requires theoretically-informed extrapolation from existing evidence. This evidence can take several forms, such as evidence on existing policies that are proposed for modification, evidence from similar programs in different but reasonably comparable jurisdictions, and evidence on other programs in the same political jurisdiction that pose similar implementation challenges. Thus Implementation Analysis usually requires some "translation" of evidence to produce useful results. Politically, an intellectually honest Implementation Analysis requires making potentially sensitive assessments of governmental capacity and political turf.

A useful protocol for implementation analysis includes the following steps:

STEP 1: Analyze the specific implementation tasks that are likely to be required by a particular reform proposal. Where the specifics of a proposal have not yet been spelled out, identify the key tasks that will need to be performed and the options that should be considered at each step. For many complex policy proposals, such as health care reform, simply identifying those key tasks is likely to be an enormous undertaking.

STEP 2: Compare proposed legislation to the Implementation Analysis checklist in Table 1. Using the "warning signs" screening device shown in the central column of Table 1, identify and prioritize the most likely sources of implementation failure for detailed analysis.

STEP 3: Gather preliminary evidence on which implementation challenges are likely to arise in a particular policy proposal and create the most serious barriers to successful implementation.

STEP 4: Conduct detailed analysis of key risks, assembling more detailed evidence on how those implementation challenges are likely to play out in practice. The evidence gathered will take many different forms, and require a variety of skill sets, depending on the implementation task being analyzed. Analyzing interpretation issues, for example, will require an analysis of the clarity of direction given to program implementers in legislative language, in particular with respect to potential areas that have been left unresolved, or where the guidance given to implementers is conflicting. Evaluating the degree to which the projections of financial and human resources needed to implement a legislative proposal are realistic requires a review of current programs or similar programs in the same jurisdiction or other jurisdictions. Analyzing potential program operator or target compliance problems may involve focus groups with current program operators and program clients to identify potential problem areas, as well as a review of program evaluations of existing programs.

STEP 5: Publish report on key implementation risks, with options for changes, drawing on the potential strategic responses in the third column of Table 1. Although the Implementation Analysis should be clear in outlining problems, it should not include a single "accept or reject" recommendation. And unlike CBO findings under congressional "PAYGO" rules, it should not bind congressional action: the purpose of Implementation Analysis is informational, not to force Congress to take or forego specific actions.

Analytical Issues in Implementation Analysis

Even if an implementation proposal is seen as a good idea in the abstract, critics may charge that it has its own analytical/implementation and political problems.

Many of the potential implementation problems associated with putting a proposal for Implementation Analysis into practice are, not surprisingly, precisely the issues that I argued need to be considered in an such an analysis of any policy proposal. Can a suitable institutional home be found or created that will view Implementation Analysis as compatible with rather than a threat to its existing organizational mission or missions? Can a specific set of tasks be identified that are necessary to carry out the objectives of the proposal, as well as the resources that are needed to perform those tasks well? Will sufficient financial resources and staff skill-sets be available to allow the implementing agency to do an effective job? Will pressures to "roll out" the program quickly lead to poor early performance that damages the agency's morale and credibility? Can political interference in the agency's decisions be avoided?

"There are known knowns. These are things we know that we know. There are known unknowns. That is to say, there are things that we now know we don't know. But there are also unknown unknowns. These are things we do not know we don't know."

Fortunately, most of the potential implementation problems that may arise with Implementation Analysis appear very manageable. There is a natural institutional home for implementation analysis in the Government Accountability Office (GAO). The Government Accountability Office is a large, well-established organization that already has a strong skill base in examining the implementation of existing government programs. It has a reputation for performing quality, objective, non-partisan analyses and avoiding politicization. It has well-established relationships with congressional leaders of both political parties. Building a long-lead time into legislation setting up implementation analysis would address the "premature rollout" problem. But performing Implementation Analyses as outlined here would still be a "stretch" for GAO. Building up staff skills in functions such as conducting focus groups, as well as in analytical perspectives such as behavioral economics would require significant staff additions (or contracting out for specific pieces of analysis) where GAO does not have the needed skills. Implementation Analysis is also likely to take place on very tight timelines, with multiple revisions, as the legislation moves through Congress. This would require work practices closer to those of the Congressional Budget Office than current GAO practices.

Another potential critique of a standardized implementation analysis is that the most critical implementation problems are likely to be ones that can't or are unlikely to be predicted in advance. This idea has been immortalized in former Secretary of State Donald Rumsfeld's now famous dictum that "There are known knowns. These are things we know that we know. There are known unknowns. That is to say, there are things that we now know we don't know. But there are also unknown unknowns. These are things we do not know we don't know."

While there certainly are certainly some "unknown unknowns" in many policy proposals, many implementation problems recur across many programs and are quite predictable at least in their occurrence if not in their intensity. Even if Implementation Analysis correctly anticipates and facilitates amelioration of only a small portion of the potential implementation problems in a policy proposal, it is likely to pay for itself.

Organizational overload on the agency that implements IA is another potential concern. Certainly doing a rigorous Implementation Analysis of every bill introduced in Congress would be a huge burden—and also a huge waste, since only a small percentage of bills introduced have any chance of being enacted. The risk of organizational overload for an agency carrying out Implementation Analysis can be lessened by limiting its scope, duration and timing. Implementation Analysis could initially be enacted as a "pilot" program that will sunset after three years of operation unless it is reauthorized by Congress. For each of those three years, the House and Senate majority and minority leaders would be able to designate three bills in their chambers to be subjected to Implementation Analysis. Because Implementation Analysis will be a scarce good, congressional party leaders would presumably utilize it only where they think that it will have the most impact.

Potential timeline issues with Implementation Analysis—that is, requiring that it be implemented before the agency responsible for IA has developed capacity and procedures to do it well—could be addressed by creating a two or three year lead time before the first year that it is carried out. Having a start date that is several years in the future would give the implementing organization time to build up staff resources and develop appropriate methodologies. This practice would also weaken fears of short term political and policy costs and create more uncertainty about who is likely to be in power when Implementation Analysis takes place—and thus whose ox is likely to be gored by a critical analysis.

Political Critiques

If Implementation Analysis is such a great idea, why isn't it being done already? Several factors help to explain why implementation is generally given very limited attention in the legislative process. Legislators get political credit for legislation passed, not implementation problems avoided. Legislators also see implementation as "someone else's problem" rather than as something that they should be concerned about. Potential implementing agencies often have a limited role in developing legislation, so their concerns about implementation problems are not taken into account.

In addition to these constraints, Implementation Analysis usually would not serve the interests of the majority party in Congress: minority parties in Congress will generally favor an Implementation Analysis because they think that it will give them additional ammunition to embarrass the majority and create additional barriers to enacting majority party (or presidential) policy proposals. Majority parties are likely to oppose it for those same reasons: they prefer to get something close to their policy preferences enacted. Thus only those parties that are *not* in position to enact Implementation Analysis are ever likely to favor doing so.

All of these barriers to creating an Implementation Analysis procedure are real, but they are not insurmountable. With regard specifically to majority parties' perceived interest in avoiding Implementation Analysis, it should be noted that policymaking in Congress is not always made on partisan lines. Implementation Analysis may appeal to "median voters" in Congress as a fiscally responsible and "good government" initiative. Requiring a "trial run" of Implementation Analysis could be the price enacted by "Blue Dogs" or other conservative Democrats to support legislation proposed by the Obama Administration or congressional Democratic leaders in Congress.

Even if implementation analysis could be enacted, several political critiques could be made of doing so. First, given that almost any policy proposal is likely to have implementation challenges, requiring an Implementation Analysis could make any policy change from the status quo even more difficult, leading to a further conservative bias in a political system that is already riddled with veto points. While this is probably true, supporters of Implementation Analysis could reply that it is better to delay flawed legislation that may set back the cause it was intended to advance. Moreover if a proposal does receive a GAO Implementation Analysis "seal of approval," it could increase a proposal's prospects for enactment.

A second political problem with implementation analysis is that given the numerous judgment calls that must be made in Implementation Analysis, it will inevitably be politicized—as will the agency that is responsible for carrying it out. However, the experience of the Congressional Budget Office suggests that the risk of politicization of analysis and agencies associated with Implementation Analysis is manageable. CBO has been able to avoid this happening—even though its scorecards have "teeth" to them.

A third political problem with Implementation Analysis is that some issues—notably the risk of interference by elected officials in policy implementations—are too sensitive to be included in an official Implementation Analysis, and any effort to include it would doom any prospects of creating an Implementation Analysis procedure. In the American political system, this is probably a realistic critique, so early iterations of an Implementation Analysis should probably avoid the "elephant in the room" of political interference risks. Potential political interference problems could be noted but not analyzed in detail.

Governance Studies
The Brookings Institution
1775 Massachusetts Ave., NW
Washington, DC 20036
Tel: 202.797.6090
Fax: 202.797.6144
www.brookings.edu/governance.aspx

Editor
Christine Jacobs

Production & Layout
John S Seo

Conclusions

The analysis in this paper suggests that Implementation Analysis shows sufficient promise that it should be enacted by Congress on a trial basis, with a limited number of IAs per year, and the practice "sunsetting" after four years if it is not reauthorized. The Government Accountability Office should be the implementing agency. Because this is a new process, there should be a simultaneous refining of the methodology throughout the four year period. Implementation Analysis is certainly no panacea to avoid governance problems: "unknown unknowns" will continue to appear during policy implementation, and politicians are likely to enact policy provisions even when they have been warned that those provisions contain serious implementation risks. But Implementation Analysis offers a potentially powerful new tool to ensure that governments make informed decisions and that government policies live up to their promise.

Tell us what you think of this *Issues in Governance Studies*.

Email your comments to gscomments@brookings.edu

This paper from the Brookings Institution has not been through a formal review process and should be considered a draft. Please contact the author for permission if you are interested in citing this paper or any portion of it. This paper is distributed in the expectation that it may elicit useful comments and is subject to subsequent revision. The views expressed in this piece are those of the author and should not be attributed to the staff, officers or trustees of the Brookings Institution.

Table 1. Criteria for Implementation Analysis

Potential implementation problems:	Warning signs:	Potential strategic responses
INTERPRETATION ISSUES:		
▪ Mission drift ▪ High conflict over organizational mission during implementation ▪ Implementation delayed	▪ Important organizational tasks and priorities remain undefined	▪ Point out ambiguities to give Congress an opportunity to address them
ORGANIZATIONAL MISSION ISSUES:		
▪ Program is placed in agency with an incompatible "organizational mission"	▪ Program tasks are very different than existing mission of the proposed implementing agency ▪ Proposed implementing agency has had difficulties in the past in absorbing new programs or issues	▪ Create a new implementing agency or put new leadership in place for existing agency with strong signals about importance of new program mission
COORDINATION ISSUES:		
▪ Multiple implementing agencies fail to coordinate, or work at cross-purposes	▪ Proposal requires cooperation by multiple agencies	▪ Simplify program management and delivery structure to reduce need for inter-agency coordination
RESOURCE AND ORGANIZATIONAL CAPACITY ISSUES:		
▪ Implementing agency lacks adequate financial or organizational resources to achieve objectives	▪ Funding authorized for program is inadequate to achieve program objectives	▪ Provide adequate funding and personnel to meet new or revised program objectives
TIMELINE ISSUES:		
▪ Implementing agency lacks adequate time to develop procedures and skills needed to implement program successfully	▪ Proposal requires major changes in skill sets, technology, organizational procedures, etc. of implementing agency(ies)	▪ Provide adequate lead time to allow program to be implemented effectively

Potential implementation problems:	Warning signs:	Potential strategic responses
POLITICAL INTERFERENCE ISSUES:		
▪ Politicians intervene to influence decisions of implementing agency or overturn agency policies after they are made	▪ Electoral stakes of proposed reform are high ▪ Resource dependence of implementing organizations on government is high ▪ Insulation mechanisms for implementing organization(s) are weak	• Develop strong insulation mechanisms (e.g., independent boards, self-financing mechanisms) to insulate implementing agencies) • Create procedural barriers (e.g., super-majority requirements) to keep agency decisions from being overturned
PROGRAM OPERATOR ISSUES:		
▪ Program operators' behavior and decisions deviates from what is required to achieve objectives of initiative	▪ Performance of program operators is difficult to observe ▪ Initiative requires substantial discretion by program operators	• Develop improved monitoring and performance measurement for program operators
TARGET COMPLIANCE ISSUES:		
Program targets fail to respond in ways anticipated by program designers due to:		▪ Develop comprehensive list of primary and secondary targets ▪ Make "appropriate" responses by program targets more likely by:
▪ Inadequate incentives to make a choice consistent with objectives of policy reform due to opportunity costs, inertia, contravening incentives, etc.	▪ Target clientele is heterogeneous and therefore likely to respond to incentive structure in different ways	▪ Providing adequate mix of positive and negative incentives, adjusting incentives if necessary ▪ Focusing on "high priority" clientele for whom compliance is most needed to achieve program objectives

Potential implementation problems:	**Warning signs:**	**Potential strategic responses**
▪ Inadequate monitoring and application of sanctions	▪ Target behavior is difficult or expensive to monitor	▪ Increasing resources devoted to monitoring and compliance
▪ Lack of information or information overload lead targets to make inappropriate choice or forego choice	▪ Information requirements for clientele in responding to policy are high	▪ Providing targets with adequate information to respond appropriately ▪ Lowering costs of acquiring and utilizing information
▪ Inertia and/or overly complex set of choices that leads to lack of any choice	▪ Options available to targets are complex	▪ Simplifying choices, and making the desired response the default if possible
▪ Targets having inadequate resources to comply	▪ Desired response from clientele requires substantial resources (e.g., money, human capital)	▪ Providing resources needed to comply

Endnotes

---

[1] Bardach also warns that it is important to apply a structured approach to policy analysis in a non-mechanistic fashion, applying more resources to the components of policy analysis that appear to most critical to a proposal's success. Eugene Bardach, *A Practical Guide for Policy Analysis: The Eightfold Path to More Effective Problem Solving,* [second ed.], Washington, D.C.: Congressional Quarterly Press, 2005, p. xv.
[2] See for example Robert T. Nakamura and Frank Smallwood, *The Politics of Policy Implementation*, New York: St. Martins Press, 1980, p. 33.
[3] James Q. Wilson, Bureaucracy: What Government Agencies Do and Why They Do It, New York: Basic Books, 1991, p. 109.
[4] See James Q. Wilson, *Bureaucracy: What Government Agencies Do and Why They Do It*, pp. 100-101.
[5] The term "program operators" is Wilson's in *Bureaucracy*. The "street level bureaucracy" term was coined by Michael Lipsky. See in particular *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*, New York, Russell Sage Foundation, 1980.
[6] For a more detailed analysis, see R. Kent Weaver, "Target Compliance: The Final Frontier of Policy Implementation," Brookings Institution Issues in Governance Studies Number 27, September 27, 2009.
[7] For an accessible introduction to behavioral economics, see Richard H. Thaler and Cass R. Sunstein, *Nudge: Improving Decisions About Health, Wealth, and Happiness*, New Haven Yale University Press, 2008.