

Implementation Failure of Fund Allocation and Management Policy for Project Preparation and Readiness: An Analytical Appraisal

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ABSTRACT

Economic Relations Division (ERD) formulated “Fund Allocation and Management policy for Project Preparation and Readiness” on 6 March 2017 to provide financial support for feasibility study and land acquisition at the project preparation stage of various Ministries/Divisions of the Government of Bangladesh. Despite such efforts, ERD did not get any response from relevant Ministries/Divisions to implement the policy. The paper critically examines the causes behind the implementation failure of the policy. The study found that officials of the project implementing Ministries/Divisions were not well informed about the policy in particular. Moreover, the Ministries/Divisions, which have several initial roles to play in order to bring implementation process on board, have hardly done anything to prove that the existing bureaucratic set up is reluctant to take proactive initiatives to implement new policies unless they are somehow forced by the external environment. Besides, there exists a similar kind of fund, allocated in favour of the Programming Divisions of the Ministry of Planning, which allow the project implementing Ministries/Divisions to get financial allocation for a feasibility study at the project preparation stage. This similar kind of fund may decrease the importance of the ERD formulated fund for project readiness. Similarly, absence of allocation in the right place is also one of the root causes for implementation failure. Considering the findings, among others, recommendations include holding of workshops for further dissemination of the policy documents and the scope and responsibilities of each Ministry/Division.

Keywords: Policy implementation, implementation failure, project preparation, project readiness

INTRODUCTION

Bangladesh government has been formulating numerous policies in various nationally significant issues since independence. Many of them earned applauses from both academics and practitioners at home and abroad. The country also experiences the successful implementation of a great number of policies such as health policy, education policy, gender policy, environment policy, and so on. However, partial or non-implementation of several policies became a topic of discussion nowadays, although limited to the academic arena. It is worth noting that implementation is a very important part of the policy process. Policy process does not end up only with the formulation or enactment of policy; rather, implementation is considered as one of the key elements of the whole process. Generally, an

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implementation does not come as a sequence immediately after the formulation. The government needs to undertake several initiatives to make public policy implementable. In between two processes, various things can happen, and various interests can interact with each other, which might or might not result in hampering implementation process. Therefore, it is equally important to examine the aftermath action or inactions of the actors or stakeholders after the formulation.

Despite initiatives and concerns about effective implementation, usually, causes arise in a policy process, due to which implementation can be hampered. Lack of effective dissemination of information to the stakeholders/implementers can be one of the root causes. Moreover, the usual less-responsive bureaucratic set up may be reluctant to take the proactive initiatives to implement new policies unless they are somehow forced by the external environment. Further, the policy may have in-built setbacks, which may happen due to non-participation or non-active participation of stakeholders in the policy-making process, that is why the implementing Ministries/Divisions do not own the ideas. In addition, the policy may contain some provisions, which are not user-friendly; therefore, the implementers take less interest in it. Further, there may exist many more causes, which have effects on total non-implementation or partial implementation of policies.

Likewise, other public policy-making processes, Economic Relations Division (ERD) of the Ministry of Finance identified a significant number of government projects of different Ministries/Divisions as ‘slow-moving projects’, which takes an unusual long time to implement the projects and requires repeated extension of implementing time results in time and cost overrun. They also increase the cost of both foreign and domestic borrowing of the government. In order to speed up the government’s project planning and implementation process the “Fund Allocation and Management Policy for Project Preparation and Readiness” was formulated, which was approved on 08 February 2017 by the Cabinet Committee on Economic Affairs. Later on, it was circulated by ERD and gazetted on 7 March 2017. It is worth noting that, the policy finalized after series of extensive discussions with the stakeholders, which were led by the Cabinet Division in cooperation with the other relevant Ministries/Divisions, where ERD also had a leading role. The Finance Division, the Ministry of Planning and other 18 Ministries/Divisions, who engage in development project preparation and implementations, were an indispensable part of the policy formulation process. The policy was formulated with a view to addressing the project implementation challenges. There is scope in the policy for financial allocation for the Ministries/Divisions at the project preparation stage, which was unavailable previously. The financial facilities are for all kinds of feasibility studies, land acquisitions, draft Development Project Proposal (DPP)/Technical Project Proposal (TPP) preparation, design for civil work, bidding document preparation, pre-approval office expenses and so on. The policy also includes a checklist stating various stages and duration of a project, in order to help project implementing Ministries/Divisions to be in the track.

The policy was considered immensely helpful at the formulation stage. However, already more than two years have been passed, no attempts have been made from any Ministry/Division to implement the policy. The Finance Division is supposed to create a special fund and formulate a committee to activate the fund. However, no initiative has been made so far from them. Moreover, no project implementing Ministries/Divisions yet exploit the opportunity to use the fund allocated for project readiness. Therefore, it has become a case of implementation failure, which requires a scholarly inquiry to find out the causes behind it.

LITERATURE REVIEW

Although policy implementation discussion requires much attention as it has serious implications on governance, it was not taken as an academic discussion before the second half of the previous century. In fact, the discussion has emerged as a significant discourse in the epistemological arena since the 1950s. Afterwards, implementation studies got momentum in the 1970s in the United States, as a response to growing concerns over the effectiveness of wide-ranging reform programs. Then the process of “translating policy into action” (Barrett 2004 p.251) or implementation attracted much attention of the academics since several policies seemed to lag behind of policy expectations. Hill and Hupe (2002) point out that implementation research was conducted in the scattered way before the 1970s. Afterwards, the next three decades experienced a great number of research studies on implementation. Research of Lipsky (1980), Elmore (1978), Sabatier (1986) and many more are worth mentioning. According to deLeon & deLeon (2001 p 467), “although implementation may be among the most devilish of wicked problems, it remains a critical part of public policy studies.”

By summing up a good number of previous studies, Goggin et al. (1990) identify three generations of implementation research. The first generation researchers, who dominated much of the 1970s, tried to find out the problems behind policy implementation, i.e. uncertain relationship among policies, decisions, and implemented programs. Interestingly, several scholars characterized this generation implementation studies as pessimistic because of a number of case studies that represented examples of implementation failure. The studies of Pressman & Wildavsky (1973) and Bardach (1977) are also considered as first generation research. On the contrary, second-generation studies put emphasis on the analytical framework of implementation, which includes the top-down and bottom-up perspectives. Further, they try for a synthesis between the approaches. However, the third generation implementation research concentrates on explicit implementation theory building.

Among all the three-generations’ scholars, only first generation scholars have evidences of working on the failure of implementation. Afterwards, no significant attempts have been witnessed to work on implementation failure of a particular policy. As for Bangladesh, a significant number of researches have been done in the field of policy-making and implementation processes. For example, Osman (2004) inquires about the health policy-making process in Bangladesh, which also focuses partially on the extent of implementation of health policy. However, no significant write up has been found on the implementation failure of a particular policy formulated by the Government of Bangladesh. Therefore, there is a clear knowledge gap in the epistemological arena about the causes of implementation failure of a policy, which could open up the scope for further search.

The policy on project readiness is not a unique example of implementation failure. Therefore, an examination of the causes of implementation failure would help ERD as well as other line Ministries/Divisions to evaluate the policy if needed and would suggest the next course of action for effective implementation. Also, researchers in this field may find it useful as a case study. Therefore, this research would attempt to address the knowledge gap regarding the very issue. It would also attempt to determine the causes behind the implementation failure and to ascertain the bureaucrats’ cultural behaviour or response to a new initiative/ change. Furthermore, it also would look into whether the process of formulation necessarily ensures stakeholders’ view or not.

CONCEPTUAL ANALYSIS

The word implementation generally means carrying out, accomplishing or completing a task according to a guideline. Similarly, policy implementation means carrying out of policy decisions in order to meet the goals of the policy. Lasswell (1963) observes it as one of the important steps in the policy process. Similarly, Elmore (1980) views formulation of policy is the starting point, and implementation comes as a sequential process. On the other hand, Pressman and Wildavsky (1973) define it as a process of interaction between the goals and actions. Subsequently, Mazmanian and Sabatier (1983) depict policy implementation is carrying out of a policy decision, usually incorporated in a statute, but which may also take the form of important executive orders or court decisions. The word 'implementation' encompasses actions that are directed to achieve the objectives depicted in policy decisions. This includes one-time efforts to transform decisions into operations and continuous efforts to achieve the changes those are stated policy decisions (Meter and Horn 1975 p. 447). Generally, public policy implementation encompasses actions by public entities that are directed objectives set forth in the policy.

The implementation process takes various shapes and forms in terms of cultures and institutional settings (Hill and Hupe 2002). According to the 'Rational Model' for effective implementation, there are some factors, which act as variables in the implementation process. These are clarity of policy goals and objectives, accurate and consistent planning, clear and detailed task assignments, accurate standardization, proper monitoring, rewards and punishment. Similarly, Elmore (1978 p.195) identifies four main elements for effective implementation, which are: (1) clearly specified tasks and objectives that accurately reflect the intent of policy; (2) a management plan that allocates tasks and performance standards to subunits; (3) an objective means of measuring performance; and (4) a system of management and social sanctions to hold the implementer(s) accountable for their performance. Giacchino and Kakabadse (2003) reveal that the decisions were taken to locate political responsibility for the initiatives. Also, the presence of strong management or team dynamics and level of commitment shown to policy initiatives are also important. Along with these, the success of implementation also depends on the motivation, capacity and will of the organization's leader. Sometimes, implementation of policy leads towards a result, which is quite different from the intended goal set by the policymakers. Thomas (1991) also argues that the effects of policy become more visible with the proceeds of implementation.

On the contrary, failures or non-implementation are caused due to lapses of the ingredients, necessary for a successful implementation. In a policy cycle, having implementation and management plans and organization is significant. Without these, successful implementation cannot be possible. In addition, if the policy has been formulated without the effective participation of stakeholders, it may also result in non-implementation of that policy. Moreover, clarity of policy goals, specific task assignments, standard and consistent planning, agent capacity, the complexity of joint actions should be incorporated in the policy so that it can expedite effective implementation. Similarly, before going for implementation, the process of converting financial resources, material, and other activities in a formally coordinated way to produce goods and services is necessary for effective implementation. To add with these, proper organization of financial and human resources, administrative and organizational setup and other arrangements are also necessary. Figure 1 shows the significance of organizational and management plan for turning policy into action.

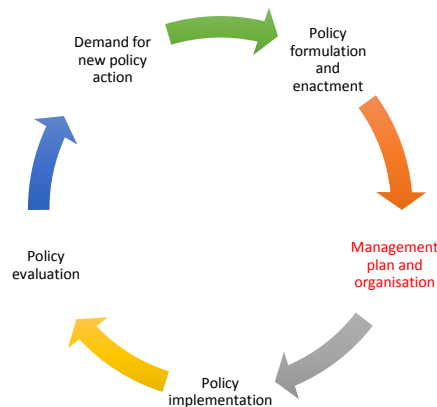


Figure 1: Policy Cycle

The public policy implementation process influenced by preferences and perceptions of bureaucrats or other related actors. As a result, sometimes policies need to be modified at the implementation stage through resistance, acceptance, and ignorance, which create an implementation gap and decrease the significance of a policy decision (Osman 2004). Similarly, implementation progress also varies in terms of development. Developed countries experience more successful cases of implementation, while it is somewhat unpredictable in the case of underdeveloped countries. In developing countries, a common tendency found within the government is to formulate sweeping policies and bureaucracy often lacks the capacity of an implementation (Khan 1987). Likewise, other developing country, Bangladesh's case is no exception. In Bangladesh, implementation is a real challenge of a policy cycle. Faulty implementation plan and strategies, lack of proper organization, difficulty in resource mobilization and capacity building, improper human resource management, lack of effective leadership to provide proper guidance towards the colleagues, bureaucratic behaviour towards change are the major causes for implementation failure of policies in our country.

METHODOLOGY

The study aimed at exploring the root causes behind the implementation failure of the policy on project readiness, which compelled the policy enacting Ministry/Division to go for an evaluation. The term "Implementation failure" would here necessarily mean the absence of management plan and organisation for proper implementation, which ended up with non-implementation of the policy. The study employed the interpretive method since the social science research follows the naturalistic orientation to inquiry. Similarly, data analysis follows the inductive or subjective method due to the nature of the study. Qualitative data were collected from both primary and secondary sources. The secondary source is books, journal articles, research papers, and so on. On the other hand, primary data are collected from the relevant Ministries/Divisions through Key informant's interview (KII) and observation method. Two officials from the Foreign Aid Budget and Accounting (FABA) Wing and one from Development Effectiveness Wing of ERD were interviewed, as ERD is the policy initiating organization. Along with them, two official officials from the Programming Division of Ministry of Planning and one official from the Energy and Mineral

Resources Division, one from the Power Division, one from Local Government Division, and one official from the Finance Division were interviewed, as they are the very important stakeholders.

The Ministries/Divisions were selected on the basis of their role and involvement with this policy implementation. A total number of 09 officials' views were taken through direct interview method. Sampling was done on the basis of relevancy of the officials with the tasks. The officers of the project implementing Ministries/Divisions are from the Planning Wing or the Development Wing, which are primarily responsible for developing project documents and implementation. On the other hand, interviewed officers from ERD, the Finance Division, and the Ministry of Planning were responsible to implement the policy. More importantly, they were actively involved with the policy-making process. In order to get all necessary information, an open-ended questionnaire was prepared for those interviews. However it was not shared with the interviewees; it was only to guide the researcher for KII. The interview questions were unstructured and taken in the form of discussions following a checklist, which contains all related important issues. Initially, the interviews were recorded electronically and later, those were transcribed into texts. Further, all data were collected from 12 to 14 March 2019. Data analysis of the article followed some assumptions. In addition, findings are presented in several subsections. Each of these subsections discusses how the information of the interviewees is contributing to proof of the assumptions.

FINDINGS

Generally, development project planning requires plenty of efforts and skilled manpower to accomplish the tasks in time, for which it also requires a significant amount of money at this stage. For example, a feasibility study of Padma Bridge was itself a project, which had to spend US\$ 17.28 million to get a final project plan done. However, the Ministries/Divisions do not have any specific financial allocation at the project planning stage. There is no provision in the national budget for that. Moreover, there are some time-consuming works, e.g. land acquisition, bank account opening, and so on are sometimes become out of control of the line Ministry/Division. As a result, most of the cases, the project document preparation process delayed due to failure in managing all the activities in time. Similarly, the project document made through this process is not a professional one. As a consequence, they have a negative impact on project cost (in case of both foreign and domestic borrowing) mobilization and disbursement process. At the same time, it increases the amount of foreign aid in the pipeline. Additionally, it increases time and cost and overrun, which also increase the cost of borrowing of foreign resources inflow into Bangladesh.

Development Partners (DPs) also observe that the project implementing Ministries/Divisions used to take a long time to come up with final and approved projects. They also take usually an exceptionally long time to start the implementation process. As a result, ERD, on behalf of the government, has to pay a huge amount of taxpayer's money as a commitment fee to the DPs. It also creates extra pressure on the national budget. One respondent of the study also depicts the same observation saying that *it is found in most cases, that the financial agreement between development partners and ERD signed, but the project is not ready to implement. In that case, ERD has to pay the commitment fee for a long time until the disbursement starts, which causes a financial burden to the government. In*

addition, after getting the contract agreement signed by ERD, awarding a contract to the parties, Project Director's appointment, and land acquisition takes an unusually long time, which causes a delay in project implementation. Further, delay in DPP/TPP formulation and delay in other preparatory stages are also the reasons for the underperforming ADP utilization.

In this backdrop, ERD formulated the policy on project readiness with a view to supporting the Ministries/Divisions both financially and technically in their project planning process. This would enable them to come up to the Finance Division or ERD for finance mobilization with a ready project document to implement (meaning that sufficient feasibility studies and other technical tasks done professionally and land already acquired). As a result, the Ministry can kick off implementation in no time after getting finance from the government. And that will help them and ERD to approach the development partners and ensure foreign aid disbursement in due time. That is also true for domestic borrowing. The same view was echoed by another respondent who said that *the policy was actually a brainchild of the then Secretary of ERD in 2017*. By observing the prolonged project planning, approval as well as implementation process, the Secretary suggested in the 'First Tract Projects Monitoring meeting', chaired by the Principal Secretary to formulate a policy to guide the line Ministries/Divisions for project readiness along with the provision of financial support for land acquisition and feasibility study at the project formulation period. This would enable them to come up with almost the final or approved project before getting foreign aid approval.

He also informed that *the decision of formulating the policy was taken by the then Principal Secretary. An inter-ministerial committee was formed, which was headed by the Cabinet Division, where representatives from the Finance Division, the Ministry of Planning, ERD, and other 18 line Ministries/Divisions participated. The committee also formed a sub-committee for preparing the checklist of project readiness. These committees came up with the final policy after having an extensive discussion with the members in around 15 meetings. And finally, as decided in the committee, ERD circulated the policy. One respondent claimed that ERD sent the policy document to all concerned Ministries/Divisions twice for information and necessary actions. Also, since this is a gazetted document, the Bangladesh Government Press also used to send this kind of documents to all Ministries/Division.*

According to the policy, the Finance Division has a significant role to play. They are supposed to create a fund for that purpose under the annual budget (Mid-term Budgetary Framework) and form a committee with the relevant Ministries/Divisions as members. The committee is to decide the amount of allocation for project readiness. However, no existence of such type of fund is found in reality. Similarly, they formed no committee yet. As asked in the interview, one respondent informed that *ERD communicated with the Finance Division both formally and informally. ERD sent a formal letter to the FD requesting to form the committee and to create the fund. However, ERD did not receive any formal response from them. Rather, informally they told that if the line Ministry/Division seeks for any fund, they would then consider the financial support issue.*

Another respondent informed that the Finance Division was also an indispensable part of this policy-making process. A representative (one Senior Assistant Secretary) from the Division actively participated in a series of meetings organized by the policy-making committee and sub-committee. However, *the Finance Division did not do anything specified in the policy because no line Ministries/Divisions contacted the Finance Division and ask for any fund allocation. If they asked, the Finance Division would then take action accordingly.*

He also feels that *the policy would definitely be beneficial for the Ministries/Divisions. It would help them in project formulation and implementation process.* Respondents from other line Ministries/Divisions also believe that the policy is certainly beneficial for any Ministries/Divisions to prepare project documents in the project planning stage. *Particularly, the option for financial support for land acquisition before getting an approval of project documents is immensely helpful.* One of the respondents thinks that *the policy would be extremely beneficial for any development Ministries/Divisions, those are working with development projects. The policy contains the checklist for project readiness, which would help to follow the chronology of a project in the right way. On the other hand, provision of financial allocation in the project preparation period and for land acquisition is beneficial to complete the project preparation in the stipulated time.* Another respondent feels that *the policy must be beneficial for any Ministries/Divisions, those are working with development projects. Since there is a checklist for project readiness, it will guide Ministries/Divisions to follow the accurate project planning process. On the other hand, financial allocation for project preparation would also help to take the feasibility study and other activities before preparing a project document.* According to a respondent, *in order to exploit the opportunity stated in the policy, one of the measures could be to make this policy mandatory for the user Ministries/Divisions while preparing any project document. That would certainly pave the way for using the policy in an efficient way.* However, ERD urged all the Ministries/Divisions to follow the policy guidelines and checklists for readiness before coming to ERD to get foreign allocation for any of their projects; but they did not make it mandatory. A respondent told that *ERD also wanted to make it mandatory to follow the policy while approaching for foreign aid. However, for practical reason, they could not make it.*

Unfortunately, the policy could not able to make any appeal to the end users. Although ERD claims that they sent the policy documents to the concerned authorities. However, most of the respondents informed that they know nothing about the policy and its implications in their offices. Most of the respondents agree that they first came to know about it from the interviewer. According to a respondent, *“ERD might send the policy to the Ministries/Divisions. However, it might not notice properly and was kept in the official file and never put up. Traditionally, if we receive any letters or documents from outside the office, the secretary of the Ministry/Division usually see it and send it down to the junior officers hierarchically. If there is no clear instruction on the letter or documents, the Section Officer keeps it in the file without taking any action. This may be happened in the fate of this policy”.* Ministry of Planning usually looks after the issues related to project preparation. However, they did not implement the policy since one respondent feels that it is not their mandate. He rather suggests that *ERD can make it mandatory to follow the policy guidelines before approaching for any foreign fund.* Similarly, another respondent suggests that *ERD can organize a workshop on this policy, where relevant Ministries/Divisions’ representatives can attend to make them aware of the facilities and motivate them to avail the opportunities.*

There exists a similar kind of fund for feasibility studies under the Programming Division of the Ministry of Planning. A respondent from Programming Division informed that the Ministry of Planning has allocated with a lump grant in the yearly budget to support the feasibility study of a proposed project of any Ministry/Division. At present, at least 20 feasibility studies are going on with that financial support. Another respondent also informed that the fund allocated for the feasibility study is for the bigger project. In addition, the study has to be included in the planning documents to get the allocation. Existence of similar kind of funds in the governmental system seems to have an impact on the implementation of said policy. One suggestion made by a respondent to allocate the proposed fund for project

readiness in favour of the Ministry of Planning instead of the Finance Division. According to him, *since the major tasks of project preparation and the approval process are to be done by Ministry of planning, it would be easy for them to track the progress after providing financial allocation for project readiness to the Ministry/Division. Also, it would be able to avoid duplicating funds for a feasibility study.* The idea is also supported by three other respondents.

IMPLICATIONS AND RECOMMENDATIONS

The respondents, those are responsible for implementing the tasks, particularly officers of Development Wing and Planning Wing of the Ministries/Divisions are found sufficiently knowledgeable in terms of academic and professional background. All have long work experiences (more than 20 years) and have at least a master degree from a university. Some of them have an academic degree from abroad. Therefore, in terms of knowledge and work experiences, they are proved to be competent enough to implement any policy. However, it is evident from the interviews that respondents of the project implementing Ministries/Divisions do not know that there exists a policy on project readiness. Therefore, the lack of proper information about the policy is found as the main reason for the implementation failure of the policy.

ERD officials claimed that they have sent the policy document to all relevant Ministries/Divisions at least more than once for necessary actions. They also informed that since this is a gazetted document, it should be sent to Ministries/Divisions by Bangladesh Government (BG) Press, as it is the norm of the press to send all these documents to all the Ministries/Divisions. Therefore, information dissemination from ERD's part seems to be effectively done. However, dissemination of information within the user Ministries/Divisions seems to be not done properly. According to the respondents of those Ministries/Divisions, top to bottom or both way communications regarding this policy did not happen there. It is noteworthy that the general practice of the Ministry/Division is, after receiving any document from outside the Ministry, the Secretary of the Ministry/Division usually sends it down to the immediate junior officer after seeing it. If there is no clear instruction on the letter or documents, the Section Officer keeps it in the file without taking any action. In the same way, desk officers or mid-level officers usually do not propose any actions in turn if they are not instructed by the senior officials. However, it is very hard for the Secretary of a Ministry/Division to concentrate on each and every official document unless he/she is suggested by the Wing Chief or senior officials of the Ministry or Department. In this case, communication from both ways failed causes serious inaction regarding the implementation of the policy. However, the offices pay importance to those issues, in case which they are suggested, forced or sometimes compelled to do.

Jamil (2002) finds that the bureaucracy in Bangladesh is characterized somewhat more by traditional than by modern norms (p.121). The bureaucrats are the successor of the colonial nature of bureaucracy, which is usually less responsive. They occasionally respond positively to any change. The bureaucrats of most developing countries possess similar characteristics. This kind of bureaucratic setup is reluctant to take a proactive initiative to implement new policies unless they are somehow forced by the external environment. Similar observations could be found in this policy case. The Finance Division is to take the leading role to implement the policy as per the policy instructions, but it did not play any role for more than two years, although they participated actively in the policy-making process.

Similarly, the Programming Division of Ministry of Planning is to look after the project approval process of other Ministries/Divisions. It actually acts as the initiating Division, where the Ministries/Divisions come after preparing a draft project document. Although the person who actively participated in the policy formulation process did not even suggest the Ministries/Divisions follow the policy guidelines. Moreover, the officials, who are working in the line Ministries/Divisions, did not undertake any initiative to implement the policy. To add with these, officials from ERD did not take any initiatives other than some formal communication to make it mandatory for the Ministries before approaching them for foreign fund mobilization. They limit their role to only circulating the policy time, and again even they observe that the policy has remained unimplemented for two years. ERD also could go for a review meeting of the policy, as suggested by three of the respondents. Therefore, it is evident from the KII and observation that organizational culture and bureaucratic behavior is one of the key reasons for this kind of inactions. Further, the absence of a reward and punishment system, which allows an official to get a promotion without performing certain job, also leads to such kind of situation. If this policy case is considered, it can be observed that no officials were even asked about the inaction.

It is generally claimed that the policy decisions taken without the participation of stakeholders, goes in vain. However, in this case, it is found that this policy was formulated, ensuring the extensive participation of stakeholders. A series of meetings had been organized by the Cabinet Division, where all participants had their chance to provide opinion. It is also important to note that there exists a similar kind of fund, allocated for the Programming Divisions, which allow the Ministries/Divisions to get financial allocation for a feasibility study at the stage of project preparation. It gives the impression of existence of dual financial facilities for a similar cause. Furthermore, the line Ministries/Divisions is usually contacting the Ministry of Planning to get support in project formulation and approval stages. As a result, the Planning Wing of all ministries/Divisions has knowledge about the fund for the feasibility study, while they are not informed about the ERD fund for project readiness. Therefore, the existence of such a fund may lead to the non-functionality of this policy. In this prevailing context, some respondents suggest that this fund in this policy should be allocated under the Ministry of Planning instead of the Finance Division. They argue that since the entire project related activities have been done by the Ministry of planning and they are closely working with the Planning Wing of a Ministry/Division regarding any activities related to project development, fund allocation under the Ministry of Planning would make it effective.

Considering the above circumstances, several initiatives can be recommended for future actions to make the policy implementable:

- To organize several workshops initially by ERD with the participation of the Finance Division, Ministry of Planning and relevant line Ministries/Divisions for further dissemination of the policy documents and work out the scope and responsibilities of each Ministry/Division;
- To make it mandatory to follow the policy guidelines on project readiness before approaching to ERD for foreign aid mobilization;
- To revise the policy stating changing role of the Ministries/Divisions. The fund, at present allocated for the Finance Division, is to reallocate for the Programming Division of the Ministry of Planning.

CONCLUSION

In Bangladesh, slow-moving projects cause a significant negative impact on the national budget. The country also experiences a slow rate of Annual Development Programme implementation during the first half of the year. Therefore, compliance with the checklist stated in the policy might be one of the solutions to the problem. On the other hand, financial support to feasibility study as well as other technical preparation and financial support for land acquisition at the project preparation stage is immensely beneficial for speedy implementation of public projects. Therefore, compliance with the policy on Project Readiness would be very significant for government projects. However, the country's experience of this policy implementation is not a good one. By taking several initiatives stated as recommendation might improve the policy implementation situation, which would finally contribute to the development process of Bangladesh.

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