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ABSTRACT

This paper documents the development of a conceptual framework to ensure that the necessary steps are undertaken for effective policy implementation. These steps include the articulation of policy, the translation of policy into procedures, the operationalizing of those procedures into rules, and then both internal (formative) and external (summative) evaluation. The flexible framework incorporates an adapted version of Stafford Beer's model of recursive systems to illustrate the hierarchical but interdependent levels or groups of people involved in a statewide or provincial educational system, where policy is often initiated at one level to be carried out by representatives at another level. Not only does such a framework assist in the communication of policy, but also it is developed to encourage the ongoing evaluation of policy at different levels of the system. References and figures are included. (Author/TE)

POLICY DOCUMENTATION AND ASSESSMENT:

A CONCEPTUAL FRAMEWORK

by

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POLICY DOCUMENTATION AND ASSESSMENT

A CONCEPTUAL FRAMEWORK

Abstract

The purpose of the paper is to document the development of a conceptual framework in order to ensure that the necessary steps are undertaken for effective policy implementation. Those steps include the articulation of policy, the translation of policy into procedures, the operationalizing of those procedures into rules, and then both internal (formative) and external (summative) evaluation. The flexible framework incorporates an adapted version of Stafford Beer's model of recursive systems to illustrate the hierarchical but interdependent levels or groups of people involved in state-wide or provincial educational system, where policy is often initiated at one level to be carried out by representatives at another level. Not only does such a framework assist in the communication of policy, but also it is developed to encourage the ongoing evaluation of policy at different levels of the system.

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Introduction and Overview

This paper develops a conceptual framework for policy documentation and assessment. Incorporating an adapted version of Beer's (1979) model of recursive systems, the framework attempts to facilitate both an understanding and the use of the policy-making process -- a cyclic process initiating with policy documentation or description and ending with policy evaluation.

The concept of policy, as with many other concepts in management science, is usually described in vague and nebulous terms, if at all. Perhaps the lack of a commonly understood and accepted definition could be the reason attributed to policy often not being defined in literature dealing with policy formation, implementation, or evaluation. In fact, Guba (1984) has culled eight definitions of policy from the literature, ranging from general description (such as, "any governing principle, plan, or course of action") to specific prescription, and being defined as a process as well as a product. Guba also discusses how the selected definition determines what Weick (1979) would refer to as the policy-maker's "enacted environment" -- i.e., how a problem is perceived, initially, affects its solution and/or analysis. What appears to be implied by Guba and perhaps even more clearly expressed by Japanese management proponents, is that if such integral terms are not clarified for members of the organization at the outset, the attainment of objectives becomes difficult to assess. This concern is not new (Elboim-Dror, 1970); perhaps it might be considered on a more general

level, as indicated by March and Simon (1958): intangible, unclear, and vaguely defined objectives impair the effectiveness of a system.

A lack of clarification of policy statements and, accordingly, the domain of policy statements not only renders assessment of policy attainment difficult, but also may cause confusion over which group of individuals is accountable for policy accomplishments. As has been pointed out by Milward (1982), the more widesweeping the policy, a greater number of organizations can be involved. Moreover, policy can originate, on the one hand, from outside an organization, and particularly for those not-for-profit publically-supported social-serving organizations (Newman & Wallendar, 1978), such as schools. On the other hand, policy can be initiated from inside the organization. To complicate the issue further, policy can be directed to the entire organization or only to one of the three subsystems comprising an organization, to what Parsons (1956) referred as the institutional, managerial, and operational subsystems. (To avoid ambiguity, these subsystems have been renamed in this paper as the strategic, administrative, and operational subsystems.)

The possible confusion that could occur, then, at one or more of the policy-making, policy-implementing, and policy-evaluating stages by these stakeholders, who may or may not be the same group of individuals, provides the rationale for the development of a conceptual framework for articulating policy. Hence, to promulgate the notion that policy can involve, potentially, a wide range of individuals both within and outside of the organization, the suggestion here is that policy be viewed in a recursive model, similar to that as first proposed by Beer (1979), and later adapted by Rees (1983). First, to highlight that the

model is intended to provide flexibility and to convey a loose-coupling, the following definition of policy is used to focus this thesis: "a proposed course of action, or the guideline for decision-making that is intended to enable the institution to attain its goals." Second, rather than policy statements referring both to the system as a whole and to each of its subsystems, the model, in essence, disaggregates sweeping policy statements into increasingly more specific guiding principles of policy, procedures, and rules. And third, each of these three guidelines, correspondingly, is mapped onto the strategic, administrative, and operational subsystems, the three subsystems which constitute any viable system/organization.

This conceptual framework has several noteworthy attributes. One, the model recognizes the interdependence of policy development, implementation, and evaluation. Two, the model can act as a communication device to identify these groups that are responsible for different aspects of the policy-making process, (from initiation, to enactment, to monitoring, and also for assessment). And finally, the framework acknowledges the differences in evaluation that do and should continue to take place on a system-wide basis: the internal subsystem assessment for formative or developmental purposes, and the external evaluation to validate subsystem or system goal achievement for the purpose of accountability to an external public. Hopefully, the benefits of such a framework should become immediately apparent to interested in managing effective policy -- people existing at each and every level of a policy-making hierarchy.

The Conceptual Framework

The conceptual framework is developed in detail in this section of the paper. The objective is to arm the practitioner with sufficient knowledge of the model and how it was formulated in order to encourage its appropriate use, and in the wide variety of situations for which it was intended.

In a proposal for research of the Ontario Government's educational evaluation policy, Wilson and Rees (1985) identified at least five levels of policy-making for the Ontario educational system. They are the Ministry of Education, the school board or district, the school (either inclusive or exclusive of departments or other relevant subunits), the classroom, and the student. Educational policy could be developed and, indeed, undoubtedly has been developed for each of these five levels discretely, and for more than one of these levels concurrently, either by officials internal to that particular level or by those at a higher level of authority.

If the intent of policy-making is to ensure that the organizational goals are being met relatively efficiently and effectively, it seems sensible to carry out some assessment or evaluation of the policy. Accordingly, documentation of policy must be the first step of any evaluative process. Figure 1, below, demonstrates an initial attempt at identifying <u>what</u> policy has been developed.

[Insert Figure 1 here]

This first diagram offers more than just a format for documenting policy: it distinguishes among those levels within the educational

system -- the level(s) at which the policy originated from the level(s) at which the policy was intended. For example, policy concerning the reporting of student progress is obviously directed to the student. But the initiators could be one of more of the following: teacher (who represents the classroom level), principal (representing the school), superintendent (representative of the school board), and so forth. The diagram illustrates, moreover, that policy can be micro and/or macro in perspective, and more overarching as it relates to higher hierarchical levels within a provincial educational system. In these respects, Figure 1 offers a mechanism for documenting more than just a statement of policy.

Figure 1 has a serious shortcoming, however. It portrays each level within the educational system strictly as an independent, rather than as a dependent, unit. More appropriately, the cells should be viewed as interrelated. For example, a board's policy relating to the documentation of student progress could be completely separate from the school's policy. But a school's policy could be the result of its board's policy. Both the users and the appraisors of the policy(ies) should be cognizant of that distinction. The policy evaluators, in particular, should be concerned whether each inter-level policy statement is consistent with its higher level one.

Figure 2 is an attempt to overcome that major flaw identified in the initial diagram. First of all, Figure 2 depicts the educational system as a triangle, as Anthony (1965) proposed, reinforcing the perspective that the base of the triangle, the operational core, is the raison d'etre of any viable organization (Emery & Trist, 1969). Secondly, the concept of the hierarchical yet interdependent levels is

included by showing the nested or embedded levels of responsibility and authority within the overall educational system. This model could easily be expanded or contracted to illustrate the chain of command, the different hierarchical levels, that are involved in each phase of policy initiation and policy enaction. The diagram also usefully shows the different levels of policy, from complex policy that initiates from outside an institution to a more simple policy that both originates and is intended for the one and the same hierarchical level within an organization. Overall, then, the diagram displayed in Figure 2 demonstrates a flexibility and verisimulitude that is missing from Figure 1. Figure 2 is preferable, not only because it provides a means for documenting policy, but also because it has the capacity to pinpoint both how and which inter and intra-institutional level(s) are involved in a particular policy.

[Insert Figure 2 here]

Despite these merits, Figure 2 neglects to show a connection between policy initiation and policy enactment. A linchpin is required, one which provides policy interpretation and support (Fullan & Park, 1981).

Parsons (1956) was the first to propose that organizations as systems have three, not two, subsystems which are interdependent, not dependent. While each subsystem carries out certain activities or functions in a relatively independent manner, the subsystems, collectively, require some coordination via an intermediary subsystem to attain a system's overarching goals.

Each of the subsystems has a different purpose. The first subsystem is the institutional subsystem, having both an external and an internal focus. Its external focus is aimed at defending, legitimating, and maintaining the organization, its goals, and its domain with respect to its environment to ensure the viability (survival and growth) of the organization. Its inward focus deals primarily with policy formulation, providing direction necessary for overall organizational goal attainment. The second subsystem, the one in the middle, was labelled by Parsons as the managerial subsystem, carrying out all the necessary functions to integrate the policy initiators with the policy implementors. Those activities are coordinative in nature, including the monitoring and control aspects, and allocating and scheduling the resources provided by the institutional subsystem. And the third subsystem, the operational subsystem, is concerned with policy implementation, using the resources assigned to transform organizational intention into action. (Because several contentious meanings exist for both the words 'institutional' and 'managerial', the words 'strategic' and 'administrative' are used in the remainder of this paper to replace the words 'institutional' and 'managerial'.)

The direct application of Parsons' concepts to policy-making, then, reveals that policy must be handed down, by means of a communication process: from the apex of the organization, (those in the strategic subsystem); by way of the middle managers, (those in the administrative subsystem); to those 'front-line' individuals, (those involved directly in operations). Furthermore, Stoner (1978) has suggested that 'policy devolution' process occurs in the following three distinct formats of: (1) policy, which is duly broken down into (2) procedures, which are

made even more specific in the form of (3) rules.

Figure 3 offers a means of showing both the one-to-one mapping and the processes occurring in these subsystems. First, the strategic subsystem formulates policy. Then the administrative subsystem interprets the policy into procedures, the standard ways and means to be followed. And third, the operational subsystem rephrases the procedures into even more specific guidelines known as rules, the outline of the uses of the resources in order to implement policy.

[Insert Figure 3 here]

To summarize, the five hierarchical but interdependent levels of any provincial educational system, as shown in Figure 2, can <u>each</u> be considered as a system in itself. And each of these levels is comprised of three subsystems, as revealed in Figure 3. What remains, then, is that these two diagrams be combined. But first, one question requires answering: <u>How</u> are these levels interrelated or, more to the point, <u>where</u> (in which subsystem) is one educational level nested within its hierarchical level? Beer (1979), in his ongoing study of cybernetics as it applies to open systems theory, has grappled with a similar problem. As a solution, he developed a theory of recursion.

Beer noted that a system becomes increasingly process-specialized or functionally-differentiated over time. Rather than adding more discrete subsystems as others such as Miller (1978) proposed, Beer contended that the model must highlight the interrelated nature of these ongoing activities. Although he believed that each viable system was comprised of five, not the more commonly-accepted three, subsystems, he

conceptualized that the embedding occurs within the lowest tier, the operational subsystem. Within that operational subsystem nests another complete system. Similarly, a third system is embedded within the second system's operational subsystem. This recursivity, Beer argued, could continue **ad infinitum**, depending on the number of levels or information available and the sophistication of the large-scale system. This 'systems within systems' concept is known as Beer's theory of recursion. It recognizes, as no other known model does, both the interdependence of systems (or subsystems, depending upon the focus or unit of analysis used) and the interdependence of functions at the hierarchical levels of decision-making that occur within the implementation stage of any process.

Figure 3, a concatenated version of Beer's model where the five subsystems have been reduced to three in conformance with the Parsonian norm, can be used to represent any system. In addition, Figure 4 illustrates Beer's theory of recursive systems, using only two systems in order to demonstrate where (in which of the three subsystems) the nesting occurs. More accurately, Beer would contend that the latter diagram portrays a system which is more complex than that of Figure 3. The more complex model contains two levels of recursion. The adapted version of Beer's model was developed by Rees (1983). In a study using this model, she demonstrated the hierarchical yet interactive nature of manpower training at the federal, provincial (Manitoba), and local levels.

[Insert Figure 4 here]

The final diagram, Figure 5, combines the concepts portrayed in the previous drawings to illustrate how an educational policy in Ontario might be captured. It tries to delineate the key assumptions that were made thus far:

1. A provincial educational system is comprised of at least five hierarchical levels;

2. Each of these levels can be considered as neither completely independent nor dependent of its hierarchical one, but rather interrelated, with different levels of responsibility and authority both between or among levels, as well as within levels;

3. Each of these levels is viewed as a system containing three functionally-differentiated but interdependent subsystems, known as the strategic, administrative, and operational subsystems;

4. Each of these levels is nested within another level, a higher order system, embedded within that latter system's operational subsystem;

5. The policy-making process includes the functions of policy initiation, policy translation/interpretation, policy implementation, and policy evaluation, with potentially different personnel responsible for each of these activities.

6. Each of these levels within the educational system involved in a particular policy must carry out the policy statement in a consistent fashion, through the use of procedures and then rules.

[Insert Figure 5 here]

Figure 5 offers a flexible conceptual framework for dealing with policy documentation and assessment. Equally well, it represents the two

situations where:

a) Policy is externally imposed on an organization; a higher order system formulates policy for another educational level.

b) Policy is imposed from within an institution; an organization develops policy for itself.

Figure 5 shows, moreover, that policy can have a macro and/or a micro intent, depending on the complexity of the issue and the 'distance' between the policy originators and the policy implementors. Finally, if policy assessment is to occur at all realistically, first policy, procedures, and rules must be documented in order to be traced from the level of origination, through to the intermediary system(s) and subsystems, to the implementation stage.

The Benefit of this Conceptual Framework for Evaluation

It was stated at the beginning of the paper that this model was intended not only to aid in the explicit documentation of policy, but also to provide a mechanism for policy evaluation. Ironically, throughout North America, organizations are reiterating such phrases as "the search for excellence" and "increased accountability." Yet without a means of assessing how to determine the degree to which the policies are working and the degree to which they have been implemented, no decision about success can be made that might rationally lead to improvement.

Unfortunately, a wariness seems to exist with respect to evaluation. It is something that more people like to talk about than to do. Wilson (1975) has noted that different parties associated with a particular policy may have different expectations. Often, the results

of one assessment are used for another purpose. Perhaps the reluctance to take an active part in evaluation occurs because the reason for the evaluation was not stated, and neither was the policy clear, nor were the various groups responsible for the different aspects of the process (external and/or internal to the organization) known.

Scriven (1967) has made a useful distinction between the goals of monitoring for policy implementation and the value of policy. He calls the first "formative evaluation" and the second "summative evaluation." The conceptual framework in this paper, by means of the hierarchical but interdependent systems, helps to differentiate, visually, the two types of evaluation that should be occurring. Those educational levels which are involved in the policy initiation to the policy implementation stages must take part in the formative evaluation of policy. But the next higher order system must be responsible for the summative evaluation.

For example, a teacher having imposed a particular testing policy on the students within the classroom should be able to assess the results individually by student and collectively for the class. If the testing policy devolved from the principal, both parties should assess how consistently and how well each of their policies are working and the degrees of implementation. But the next higher level outside of this policy sphere, the school board, should be the one responsible for determining whether that school's policy was worthwhile.

By adhering to the conceptual framework, evaluation of policy should be facilitated. The policy statements are clearly articulated and are disaggregated not only into different levels of hierarchical systems, but also into different subsystems. Thus, depending upon the

complexity of the policy statement and the point of initiation, at least five levels within the provincial educational system could be involved in formative evaluation.

Hence, the conceptual framework can be combined with evaluation theory to make a complete strategy for the evaluation of any policy. One, evaluation requires a clear statement of intent; in other words, unless policy is documented in a way that is understood by its users, evaluation is irrelevant and impotent. Two, the complexity of policy, and especially wide-scale social policy, may encompass many educational levels and different groups of people. Communication of policy must be prevalent and consistent through the policy origination, interpretation, and enactment stages of the policy-making process. And three, both formative and summative evaluation should occur at each of these levels, in order to assess the degree of policy implementation and the merit of the expressed policy.

Summary and Conclusions

The purpose of this paper was to describe the development of a conceptual framework that would be pertinent to both the documentation and the assessment of policy. Indeed, as has been noted, evaluation should not even occur without a preliminary articulation of policy. Hence, using an adapted version of Beer's model of recursive systems, a framework was developed to show the interconnected steps of policy within a complex social system, that of a provincial educational system.

An adaptable schematic representation was designed to reveal the interdependent, but hierarchical levels that may exist within any provincial educational system, as well as the three distinct stages that

must occur -- policy initiation, policy translation, and policy implementation. Each of these stages was mapped onto one of the three strategic, administrative, or operational subsystems, in order to communicate the notion that the feasibility of a policy depends on its disaggregation into policy, procedures, and rules.

Finally, the usefulness of this model was shown in terms of its applicability to evaluation. The model tries to pinpoint not only what are the policy, procedures, and rules that are recursively being unveiled to ensure that policy is implemented; but also who are the participants. Each level and each subsystem within each level involved in a policy should be involved in its assessment. Consequently, the explicit format clarifies who is accountable for which area of responsibility. What is likely to occur before anything else however, is that the investigators may discover that not all the parts of the model will be in place. Perhaps that would be the most important evaluation finding of all.

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FIGURE 1

A FORMAT FOR POLICY DOCUMENTATION

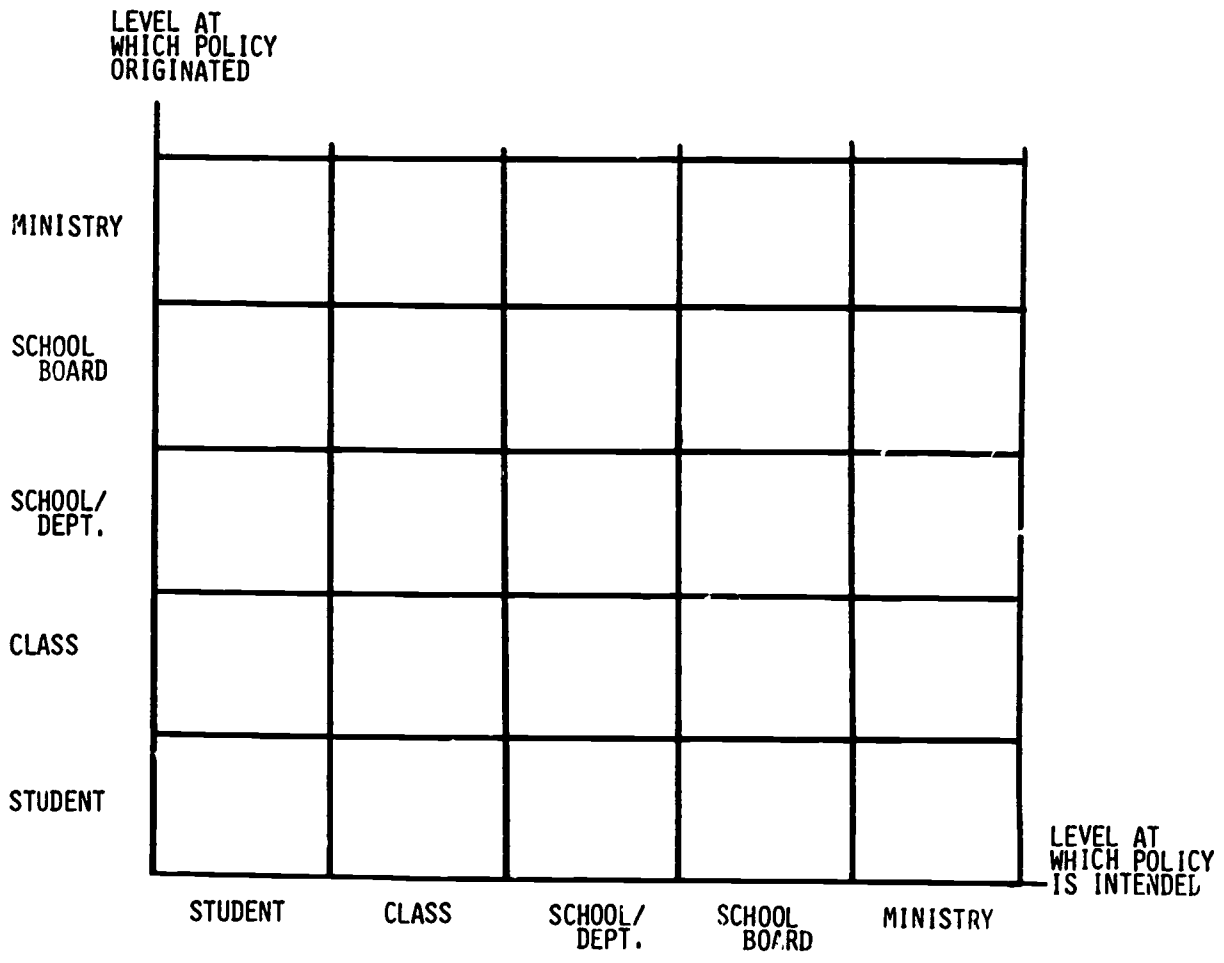

FIGURE 2

INTERDEPENDENT LEVELS OF INVOLVEMENT IN POLICY

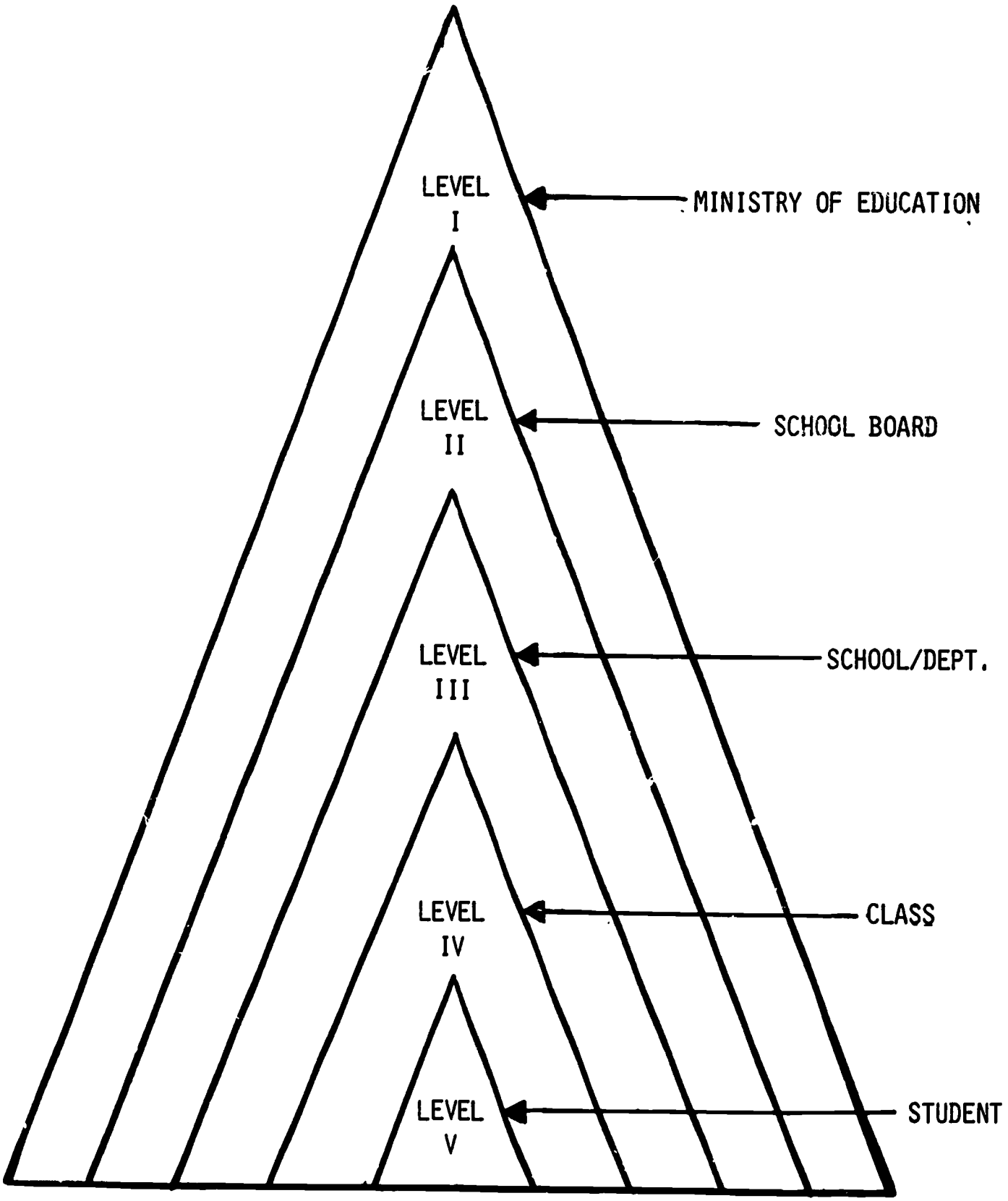

FIGURE 3

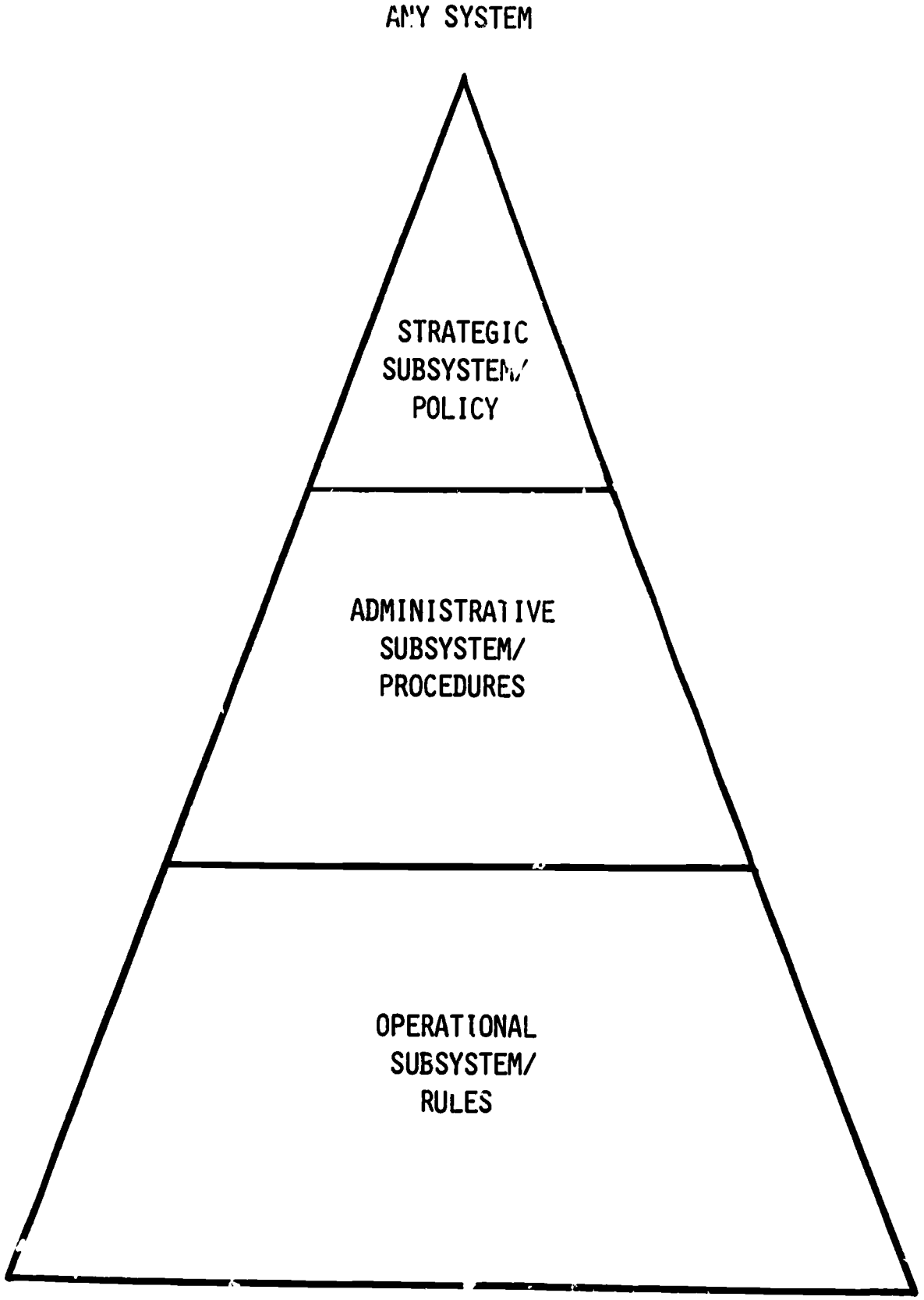
ANY SYSTEM
STRATEGIC SUBSYSTEM/ POLICY
ADMINISTRATIVE SUBSYSTEM/ PROCEDURES
OPERATIONAL SUBSYSTEM/ RULES

FIGURE 4

A SYSTEM WITH TWO LEVELS OF RECURSION

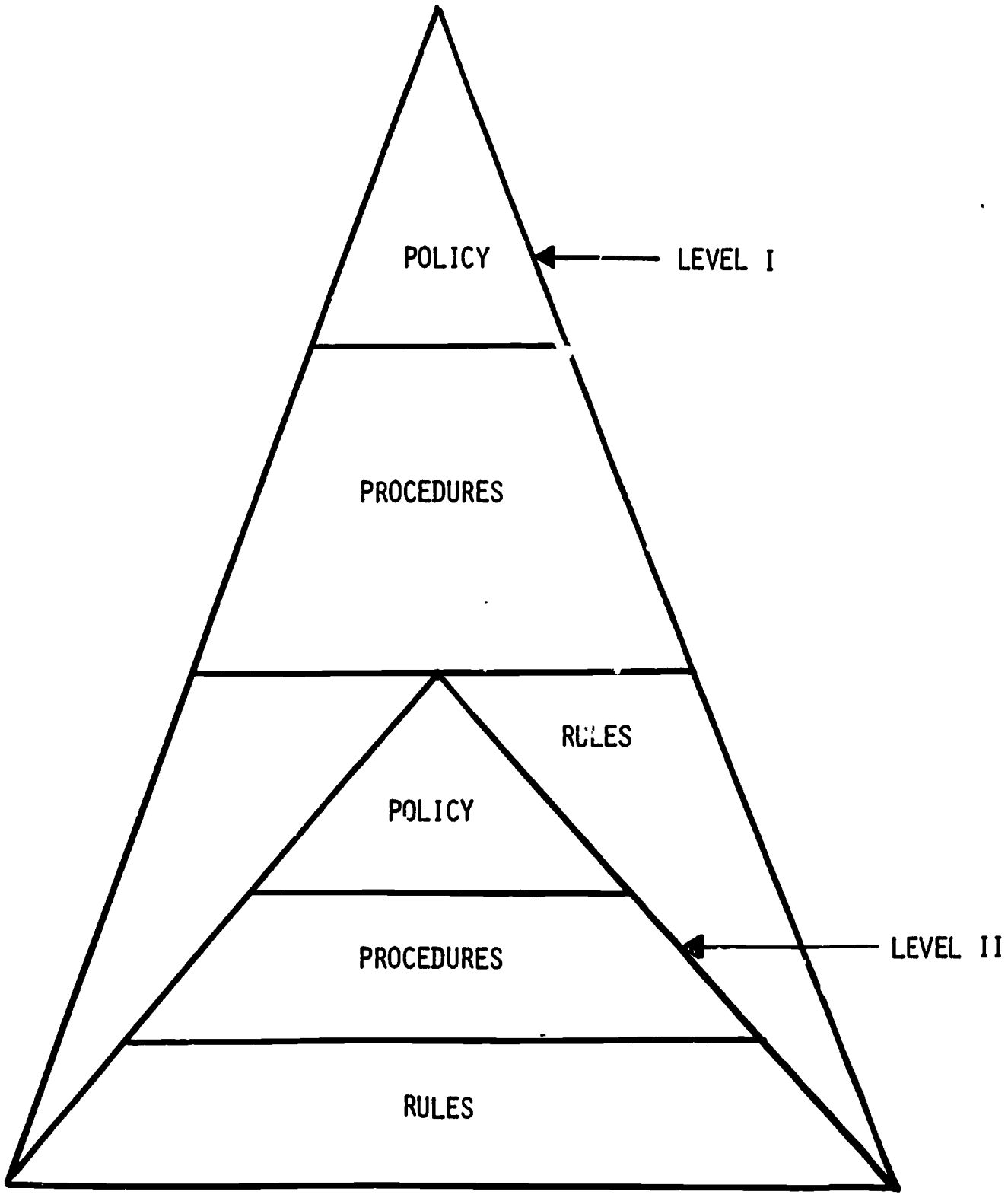

FIGURE 5

THE RECURSIVE LEVELS OF INVOLVEMENT IN POLICY