

UNIVERSITY OF TAMPERE

Faculty of Management

FRONTLINE MANAGERS AND STREET-LEVEL BUREAUCRACY:

A CASE STUDY

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11/ 2017

ABSTRACT

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Title of Thesis	<i>Frontline Managers And Street-Level Bureaucracy: A Case Study</i>
Master's Thesis	70
Time	2017
Keywords	Street-level bureaucracy; Policy implementation; Implementation gap; Frontline manager

Policy implementation gap is one of the major problems confronting both developed and developing countries. Among a number of implementation models proposed to explain the problems during policy implementation stage is the theory of street-level bureaucracy. This research also aims to contribute to the understanding of the “street-level bureaucracy” phenomenon. However, rather than analyzing the traditional street-level workers as proposed in Lipsky’s work, this paper focus on another subject of street-level bureaucracy: the frontline managers. The rationale behind this is that frontline managers, in order to cope with the pressure of their working environment and sustain their interest, also exercise discretion in their work. It would be unjustified to consider frontline managers the same as any other types of managers in the organization.

To analyze whether this argument is valid, the research is conducted using a case study about a province in Vietnam. The target policies in this study are alcohol-related one. In-depth interviews and document review are the primary data sources. The study found out that the frontline managers did exercise discretion when implementing policy. They could choose light penalties for the violators, ignore minor violations of the laws, or decide not to apply the policies depending on the situation. Similar to frontline bureaucrats, frontline managers are also under various influential factors such as the direction from the upper-level, limited resources, and the knowledge and attitude of the implementers towards the policies applied. One factor emerged from this research is the impact of local people in policy implementation, which takes the form of social power. The finding of this research presents implications for practice in terms of understanding and mediating the role of frontline managers in the policy process. Public management and implementation processes should give recognition to the special role of frontline managers, being managers and practitioners at the same time.

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1. Introduction

It is acknowledged that policy implementation is one of the major problems confronting both developed and developing countries. The early 1970s is the start of an emergence of studies specifically about policy implementation (Hill, 2013). Their aim is to find out the reason behind the gap between desired results of public policies and their actual outcome (Hargrove, 1975; Mazmanian & Sabatier, 1989; Smith & Larimer, 2009; Hill, 2013). It is an important issue since it explains how government objectives could be or not be translated into action (Krutwaysho & Bramwell, 2010).

Among a number of implementation models proposed to explain the implementation stage of the policy process, there are two dominant but contrasting approaches. They are the top-down and bottom-up models. The former suggests that policies are formulated by decision-makers at the “top” and implemented by actors at the “bottom” of the hierarchy (Sabatier, 1986). By contrast, the bottom-up approach argues that implementation actors, rather than government officials at the “top”, play the most vital role in policy success (Elmore, 1979; Sabatier, 1986). Bottom-up approach proposes that the policies formulation should be conducted at the bottom to make the policies more practical.

Another attempt to explain the phenomenon of policy implementation gap is Lipsky (1980). In his work, Lipsky puts forward a new concept called street-level bureaucracy. Similar to the rationale behind bottom-up models, the street-bureaucracy suggests that policy implementation gap could be attributed to the bottom level. Lipsky (1980) argues that actions of public service workers at street-level actually diverge from central public policies. Since then, a number of research has been conducted to analyze the cause of this divergence as well as the extent of it (May & Winter, 2009).

This research also aims to contribute to the understanding of the “street-level bureaucracy” phenomenon. However, rather than analyzing the traditional street-level workers as proposed in Lipsky’s work, this paper focus on another subject of street-level bureaucracy: the managers at the frontline. The rationale behind this is that frontline managers experience the same working environment as street-level officers. The only

difference between them is the former have power from their position and the latter do not. Thus, it would be unjustified to consider frontline managers the same as any other types of managers in the organization and put all responsibilities of dealing with the street-level bureaucracy issues on them. It is argued that street-level managers also contribute to the street-level bureaucracy issues and divert from public policies.

To analyze whether the aforementioned argument is valid, this research is conducted using a case study about a province in Vietnam. The target policies in this study are alcohol-related one. The reason is that alcohol issues have become a major topic in recent years, not only in Vietnam but also worldwide.

Statistics pointed out that the use of alcohol has been increasing among developing countries in general and in Vietnam in specific. The consumption of alcohol per capita in Vietnam (both recorded and unrecorded) among people from 15 years old increased from approximately 1.35 liters in the early 2000s to 6.6 liters in 2010 (WHO, 2004; WHO, 2014).

Currently, the quality of alcohol and wine products is a matter of concern to the public. Uncontrolled alcohol accounts for high-unrecorded alcohol consumption, which is also common in many countries. In Vietnam, homemade alcohol or homemade wine is among major sources of supply on the market although the quality of these products varies among providers. In addition, the policies regulating the production and supply of both regular and homemade wine does not prove to be highly effective. These are probably the reasons alcohol intoxication is quite prevalent in many parts of the country.

The combination of two subjects, street-level bureaucracy and alcohol control policies, brings about this thesis. The aim of this research is to describe and analyze the role of frontline managers in the implementation process. It also aims to find out if street-level bureaucracy occurs in Vietnam. It is hoped that the thesis findings could provide new perspectives into the street-level bureaucracy phenomenon as well as further understanding about the implementation of alcohol-related policies in Vietnam.

The organization of this thesis is as follows. Chapter 2 will establish the context of the implementation of alcohol-related policies in Vietnam. The chapter also highlights some key central policies in this area. The aim is to provide general information and a context for the research.

Chapter 3 will present the literature review that serves as the foundation theory of the study. The primary literature focuses on theories relating to public policy and policy process, with an emphasis on the implementation stage and street-level bureaucracy phenomenon. At the end of Chapter 3, the main argument of this thesis is stated and research questions are formulated. A conceptual framework based on the review of previous literature will be presented as a theoretical guidance of the research.

Chapter 4 will lay out the methods and design to collect data for the thesis. The rationale for choosing a case study approach will be stated in this chapter. Chapter 5 will present the results in accordance with the themes identified from the data analysis and the research questions laid out in Chapter 3. The thesis ends with Chapter 6 by discussing the implications and limitation of the research as well as suggestions for future research.

2. Vietnam context

In this chapter, the social and political context of the implementation of alcohol-related policies in Vietnam will be illustrated. The aim is to provide general information about the background of the research.

2.1. Social Context

Drinking alcohol excessively has been identified as the cause of numerous diseases. Overconsumption of alcoholic drinks could also lead to physical injuries, violence, and death. However, the use of alcohol is still on the rise among developing countries in general and in Vietnam in specific. In 2010, the global rate of per capita alcohol consumption was 6.2 liters of pure alcohol, out of which 24.8% was illegally produced or sold by home distilleries and suppliers (WHO, 2014).

Vietnam is among those countries whose alcoholic beverages consumption has been increasing rapidly. In Vietnam, drinking alcohol, including but not limited to wine, beer, and spirits/liquor, is commonplace and even considered a social practice (Harms, 2013; Nguyen-vo, 2008). According to a nationally representative survey of people aged 25-64 years by Bui et al. (2015), more than 80% of Vietnamese males drank alcohol, among which 40% were hazardous drinkers, whereas only 11.8% of females had ever consumed alcohol. The popularity of alcohol-related harms was 25.5% and 0.7% among men and women respectively (Kim et al., 2008). The consumption of alcohol per capita in Vietnam (both recorded and unrecorded) among people 15 years and older increased from 1.35 liters in the early 2000s to averagely 3.77 liters in 2003 - 2005, almost doubling to 6.6 liters in 2008 - 2010 (WHO, 2004; WHO, 2011; WHO, 2014). The figure of Vietnam in 2010 is slightly higher than that of the 2010's global average consumption of alcoholic beverages.

One problem with research about alcoholic consumption in Vietnam is that homemade alcohol is highly ubiquitous in Vietnam, which probably affects the validity of statistic results. It is common for rural consumers to purchase alcoholic beverages made from

rice, maize, and fruits by local producers (Dung et al., 2007). It is quite difficult to control the quality of alcoholic beverages produced by these private homes. Many incidents of methanol poisoning and fatalities due to adulterated and counterfeit alcohol have been reported.

A sharp increase of alcohol poisoning cases was seen in both Hanoi and Ho Chi Minh City hospitals (Tuoi Tre News, 2013). In October 2008, Cho Ray Hospital, one of the biggest hospitals in Ho Chi Minh City, received 31 emergency cases of methanol alcohol poisoning with 11 deaths. It was found out later that the alcohol sample showed a high level of methanol, which was 300 times higher than prescribed (defined as 0.1 mg / l, the fact that 1 mg / l) (Nguyen, 2012). Hanoi Bach Mai Hospital also reported that the number of patients hospitalized due to alcohol poisoning was 6 times higher than that in 2009 (Tuoi Tre News, 2013). Another incident was that in the first three days of the New Year celebration, approximately 2,000 cases of alcohol poisoning were reported (Viet Nam News, 2016).

In addition, alcohol is proved to be a major contributing factor to many other social issues such as drink-driving and risky sexual behavior in Vietnam. A research pointed out that despite their awareness of the dangers, more than 80% people still participated in drink driving, and 58% would travel with a rider who drove after drinking (Nguyen et al., 2010). According to Health Strategy and Policy Institute (2006), motorcyclists tested positive for alcohol accounted for 71% of road users. There is also a link between drinking and sexual behavior. A study conducted by Kaljee et al. (2005) showed that almost 70% of those participating in some kinds of sexual activities reported consuming alcohol. In addition, it was found that alcohol use disorders were associated with risky sex, increasing chances of HIV infection (Tran et al., 2016).

2.2. Political context

In response to alcohol overconsumption issues, the government of Vietnam has formulated a wide range of legal documents. In general, the number of alcohol-related policies that are currently in force in Vietnam is not modest. The policies cover all

aspects, from production, sales, usage, to management of alcohol consumption. However, many of them only provide broad guidelines and are subject to certain limitations in practice.

In terms of production and trading, there are three main legal documents: Decree No. 94/2012/ND-CP on wine production and wine trading, Circular No. 60/2014/TT-BCT detailing a number of articles of the government's Decree no. 94/2012/ ND-CP dated November 12, 2012 on wine production and wine trading, and Circular 45/2010/TT-BYT on the promulgation of national technical regulations for alcoholic beverages. These documents present the standards as well as guidelines for public agencies to manage and control the production and sales of wine in the Vietnamese market.

Recent revisions of the legal document system, for example, the issuance of Circular No. 60/2014/TT-BCT replacing Circular No. 39/2012/TT-BCT or the formulation of National Technical Regulation for alcoholic products, help increase the effectiveness of quality management of wine products and reduce the number of poor quality wine on the market. They also bring about consistency with the requirements of free trade agreement that aims to protect consumers in the country. However, the effectiveness of the policies is still limited, for example after two years of implementing Decree No. 94/2012/ND-CP, the majority of households producing wine at small scale are yet to register a license as required by laws because they don't know or don't want to do so (1). The independent, self-sufficient nature, with no accountability of home-brewing households, could be the contributing factors that make homemade alcohol management difficult.

Besides the legal documents on production and sales of alcohol aforementioned, a number of decree and decision are enacted, aiming at preventing and minimizing the harmful effects of alcohol abuse. To be specific, Decree No. 171/2013/CP on penalties for road administrative traffic offences and rail transport offences sets the legal limit on blood alcohol content while operating a vehicle. Other documents include Decision No. 244/QD-TTg on national policy of preventing harms of abusing alcoholic beverages by 2020, or circular No. 175/2014/TT-BTC regulating the management and use of funds from the state budget for the program of prevention of harmful effects of alcohol abuse.

These policies have addressed the needs for alcohol control since the current consumption level in Vietnam is too high, affecting the health and safety of both individuals and community.

There are also a number of legal documents that do not directly address the problem of alcohol abuse but aim to control the sales and consumption of alcohol. One of them is Commercial Law No. 36/2005/QH11, which prohibits alcohol advertising and promotion for any products with an alcoholic volume of 30 degrees or higher. Another is Decree No. 185/2013/ND-CP which includes penalties for administrative violations in production and distribution of alcoholic products, limiting the use of alcohol as well as infringement in its production. Special excise tax applied to alcoholic beverage was increased in the revised Law on special excise duty, which partly supports the control of alcohol consumption.

**Table 1. Alcohol policies and interventions by Vietnamese government.
Reprinted from WHO, 2014**

POLICIES AND INTERVENTIONS

Written national policy (adopted/revised) / National action plan	No / —
Excise tax on beer / wine / spirits	Yes / Yes / Yes
National legal minimum age for off-premise sales of alcoholic beverages (beer / wine / spirits)	18 / 18 / 18
National legal minimum age for on-premise sales of alcoholic beverages (beer / wine / spirits)	18 / 18 / 18
Restrictions for on-/off-premise sales of alcoholic beverages:	
Hours, days / places, density	No, No / Yes, No
Specific events / intoxicated persons / petrol stations	No / No / No

National maximum legal blood alcohol concentration (BAC) when driving a vehicle (general / young / professional), in %	0.00 / 0.00 / 0.00 (0.05 for motorcycles)
Legally binding regulations on alcohol advertising / product placement	Yes / Yes
Legally binding regulations on alcohol sponsorship / sales promotion	No / No
Legally required health warning labels on alcohol advertisements / containers	No / No
National government support for community action	No
National monitoring system(s)	No

However, there are still a number of weaknesses in the alcohol-related legal document system of Vietnam. The report of World Health Organization on alcohol and health in 2014 provided a brief evaluation of the policies by Vietnamese government (Table 1). It can be clearly seen that a certain number of restrictions to control alcohol supply and consumption are not applied by the Vietnamese government.

One factor that could arguably affect the control of the government over alcohol is the application of free trade agreements. The most cost-effective method to reduce the harms of misusing alcohol in Vietnam was found to be higher tax (Tam et al. 2011, cited in Nguyen et al., 2012). However, the Vietnamese government has cut down the tax rates for imported products since joining the World Trade Organization in 2007 (Nguyen et al., 2012). After the Trans-Pacific Partnership agreement is passed, the tax rates levied on imported beer and wine currently at 47% and 55% respectively are forecasted to reduce to 0% (Euromonitor International, 2016).

As for current legislation related to alcohol and its control, the central government only provides broad guidelines and general requirements in legal documents, leaving out specific strategy and action plan for implementing the policies in real life. Thus, the implementation depends greatly upon the capabilities, commitment, and current conditions of local government. In fact, at the frontline level, limited resources and

enforcement are the common cause of ineffective policy implementation. For example, although the road safety law has restricted drink driving from 2001, enforcement has been limited due to lack of equipment and manpower as well as traffic congestion (Luu et al., 2012; Nguyen et al., 2010; Nguyen et al., 2012). It has been noted that in Vietnam the policy evaluation process is time-consuming and complicated, reducing the proactive role of policies. Besides, quality control and governance are not strictly applied in implementation.

The development of effective alcohol policy in Vietnam is deemed to be challenging. The reasons could be named as “vested interest in the government in alcohol manufacturing, a lack of appreciation of the evidence base, challenges imposed by free trade agreements, and involvement of the alcohol industry in policy processes” (Nguyen et al., 2012). Thus, the implementation of alcohol policy in Vietnam is subject to various factors, which offers room for conducting research on the topic.

3. Literature Review

In this section, the underpinning concepts relating to the research topic will be reviewed and examined. First, the definition of public policy and key models of policy process will be reviewed in order to understand the components of policymaking. Second, there will be a discussion about the implementation stage with a focus on the issues regarding street-level bureaucracy and its affecting predictors. Based on these findings, a theoretical framework of the thesis will be developed.

3.1. Public Policy and Policy Process

Despite the substantial number of research regarding public policy, the term is still not defined precisely. Depending on the perspective, public policy can be seen as an action or a choice. According to Parsons (1995), a policy is an effort to provide rational explanation for a course of action or inaction. Kraft and Furlong (2017) consider public policy as the choice of public officials within government and the stakeholders they represent. On the other hand, Fredrich (1963) views policy as a way of proceeding created with an aim to fulfill a specific objective. Similarly, Anderson (2015) regards it as “a purposive course of action or inaction followed by an actor or set of actors in dealing with a problem or matter of concern” (p.7). This definition differentiates a policy from a single choice made at specific time. In this sense, a policy includes both the decision to adopt the law and the subsequent actions that follow in order to enforce it, not just the former. Thus the policymaking process is quite complex, as it does not just start with a single choice. There exist several models and frameworks concerning policy process.

Dominant in the policy process literature is the stages approach. The implication of this approach is that the policy process is linear and can be split into sequential stages. The principal concept behind the stages model is the system theory by David Easton (Hill, 2013). Easton (1953, 1965) points out that the political system could be disaggregated into a number of processes. Similarly, the policy process could be divided into different stages for analysis. The theory provides a way to simplify and conceptualize political phenomena that are often complex (Hill, 2013).

There are a number of works on stages model influenced by the system theory, for example, Dawson and Robinson (1963), Dye (1966), and Sharkansky (1970). Even without following the system approach, many frameworks still apply the idea that policy follows a sequential process (Hill, 2013). As research on stages model is numerous, the definition and number of stages proposed vary through literature. For example, Lasswell (1956) proposes a seven-stage model including intelligence gathering, promotion, prescription, invocation, application, termination, and appraisal. Brewer (1974) suggests that the policy process comprised of five/ six stages (i.e. invention/ initiation, estimation, selection, implementation, evaluation, termination). In general, policy process stages are some combination of problem identification, agenda setting, policy formulation, adoption, implementation, and evaluation (Lasswell, 1956, 1970; Easton, 1965; Jones, 1970; Brewer, 1974; Anderson, 2015).

By breaking the policy process into discrete stages, the model provides clarity and easiness for understanding the policy process. However, the linear nature of this approach leads to some key problems. It does not incorporate feedback loops in the process, which means the policy process is finished after the final stage. This is far from reality since many policies are amended after implementation. In addition, the framework fails to take into account the interrelatedness of organizations (Eger & Marlowe, 2006). Governance covers not only government but also non-government actors such as the private and voluntary ones (Höchtel, Parycek, & Schöllhammer, 2016). Thus, considering public policies as the work of only one institution is unjustified.

A crucial change to the stages model is the proposal of a policy cycle (Nachmias & Felbinger, 1982; Janssen & Helbig, 2016). The idea was introduced in response to the criticism of lacking feedback loops in stages approach. Instead of looking at policy process as a linear one, policy cycle indicates that the process is ongoing and recurring. The evaluation stage is not the end but serves as one factor of inputs to the problem definition step of the policy process. This enables policymakers to learn from the past and make necessary changes and amendments to future policies. However, the implication behind process cycle is the same as that of the stages approach. It assumes that the policy process could be divided into discrete and sequential stages. Still, the policy cycle is of

great value due to its simplicity in application, especially in developing new theoretical frameworks. A typical example is illustrated here.

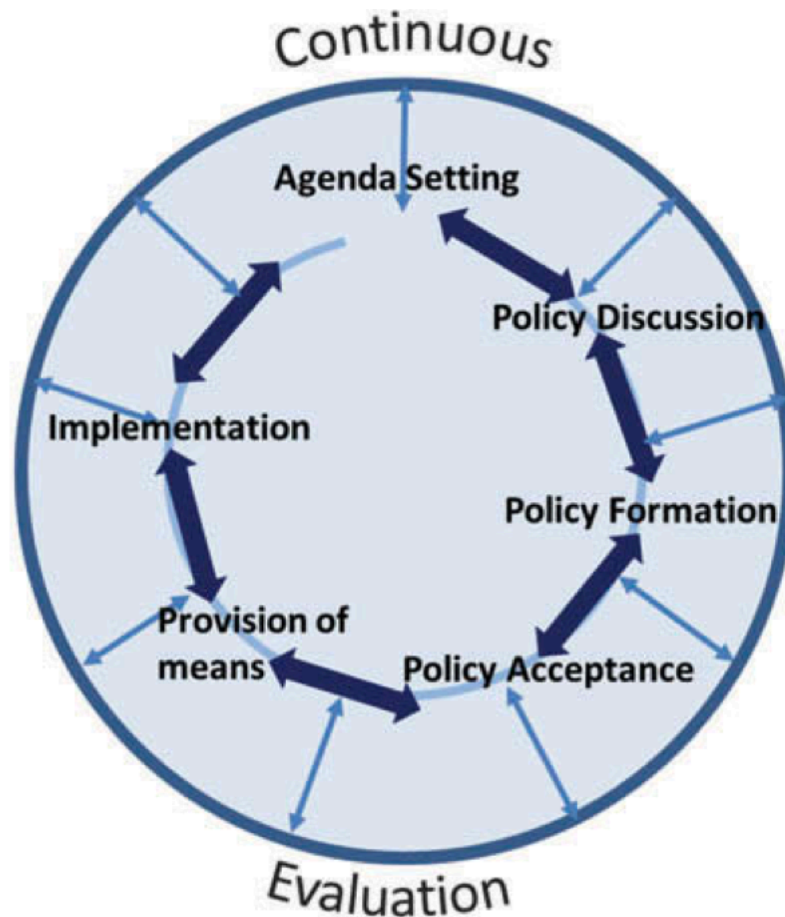


Figure 1 Big Data-Revised Policy Cycle. Reprinted from Höchtl et al. (2016)

With modern information technologies, policymaking has become more interactive as the role of non-policymakers is increasingly important in the policy process (Janssen & Helbig, 2016). Recent developments, such as ubiquitous civic engagement, open government data, and policy advice platforms with the involvement of citizen, lead to dynamic changes in public decision-making. In the light of new information and communication technologies, Höchtl, Parycek, and Schöllhammer (2016) propose a new theoretical framework integrating the application of Big Data in policymaking. Höchtl et al. (2016) argue that Big Data brings faster and better information for decision-making, which helps government officials react to adverse effects of a policy output earlier. This

framework suggests a radical change to the evaluation stage in the policy cycle. Instead of being a step at the end of the policy cycle, evaluation takes place continuously at any stage (Figure 3). In other words, evaluation becomes an integral part of all policy stages. The model is quite novel and requires a thorough and careful application of Big Data in every policymaking stage. The possibility of receiving information in real time with the help of information technologies could help government officials be better informed about a situation/ problem and significantly reduce the decision-making procedure (Höchtel et al., 2016). However, the model is in an early stage since the integration of IT in policymaking is advanced and just recently applied in some countries. It still needs further research to confirm its validity.

Another prominent theory in policy process studies is the advocacy coalition framework (ACF). It was first proposed by Sabatier in 1986 and has undergone many revisions and amendments since then. The ACF was initially described as a synthesis of two basic approaches to implementation, which are the top-down and bottom-up models (Sabatier, 1986). The ACF aims to provide better understanding regarding policy change and stability (Jenkins-Smith et al., 2017). It was also created to offer comprehensive insights into the major stages in the policy process as put forward in the stages framework (Sabatier, 1998). The framework also serves as “a shared research platform” that analyst could utilize to explain and predict phenomena in various contexts (Jenkins-Smith et al., 2017).

The ACF uses policy subsystem as the principal analysis unit (Pierce et al., 2017). It proposes that coalitions of actors in the subsystem compete with each other to have their policy-related ideas adopted by the government (Jang, Weible, & Park, 2016). This is depicted in the flow diagram of the ACF in Figure 4.

In the ACF, policy subsystem belongs to an extensive context consisting of both stable and dynamic parameters (Jang et al., 2016). These parameters create both long and short term opportunities for coalitions to exploit. According to this figure, coalitions, with different beliefs and resources, use a number of strategies to exert impacts on government decisions that eventually influence policy outcomes (Pierce et al., 2017; Jenkins-Smith et

al., 2017). These outcomes then affect both the policy subsystem as well as factors external to the subsystem.

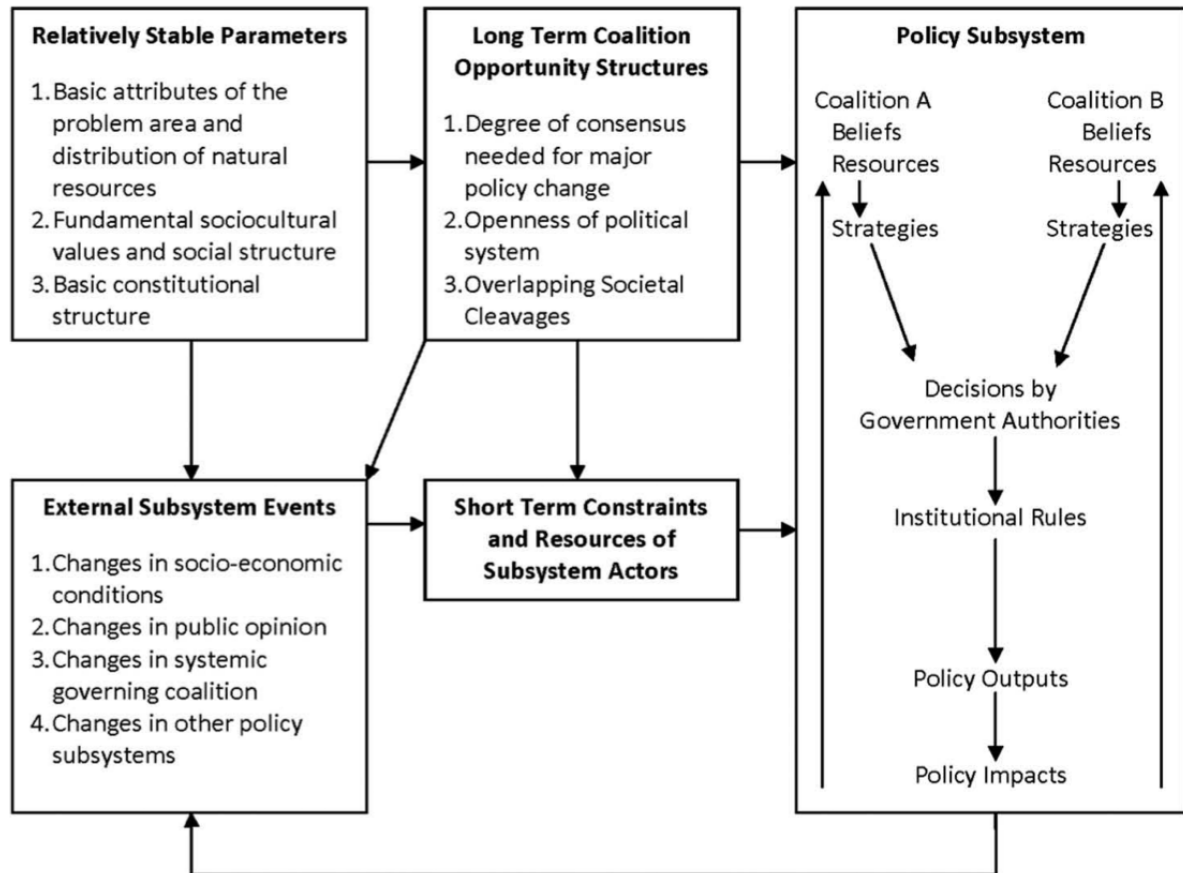


Figure 2 The Advocacy Coalition Framework. Adapted from Jenkins-Smith et al. (2017)

The ACF is a popular model with an increasing research agenda (Pierce et al., 2017). It is useful in analyzing policy process as it clearly points out the actors involved in policymaking and their relationship as well as interaction (Howlett, McConnell, & Perl, 2017). The model indicates that policymaking is not based solely on the commanding institutions. Rather it ensures that a broad range of actors representing the subsystem is taken into account. Besides, the applications of the ACF could easily utilize essential theories about advocacy coalitions, policy change, and oriented learning (Pierce et al., 2017). However, the ACF totally leave out the policy evaluation stage, which is a major

weakness of the model. In addition, it fails to elaborate on the decision-making process. In the framework, decisions are simply results of the debate among advocacy coalitions, and implementation is just a policy output (Howlett et al., 2017).

This section has briefly discussed public policy and the process of establishing it. Although there are various models and theories of the policy process, in the scope of this research, only three most popular and widely applied ones are chosen for further examination. Review of policy process theories and frameworks shows that implementation is an integral stage of the policy process. This paper will apply the stages model and assumes that the implementation stage is distinct from others in the process. The reason is that it helps reduce the complexity of too many variables in the policy process. Besides, the stages model is the most suitable theory since the objective of this research is to study about the implementation of public policy. The next section will present some implementation theories and issues regarding street-level bureaucracy.

3.2. Policy Implementation

3.2.1. Implementation Theories

The early 1970s in the US and later in Europe saw the emergence of studies specifically about policy implementation (Hill, 2013). The rationale behind these studies was that the link between policymaking and policy outcomes was missing (Hargrove, 1975; Mazmanian & Sabatier, 1989; Smith & Larimer, 2009; Hill, 2013). It is important to examine this issue thoroughly as it reflects the extent to which government objectives could be translated into action (Krutwyscho & Bramwell, 2010).

The “missing link” serves as a simple but common way to define policy implementation. Accordingly, policy implementation is the gap between the objectives of a government and their actual outcome in practice (O’Toole, 2000). Mazmanian and Sabatier (1989) defined policy implementation in a much more detailed but cumbersome manner:

Implementation is the carrying out of a basic policy decision, usually incorporated in a statute but which can also take the form of important executive orders or

courts decisions. Ideally, that decision identifies the problem(s) to be addressed, stipulates the objectives(s) to be pursued, and, in a variety of ways, “structures” the implementation process. The process normally runs through a number of stages beginning with passage of the basic structure, followed by the policy outcomes (decisions) of the implementation agencies, the compliance of target groups with those decisions, the actual impacts-both intended and unintended-of those outputs, the perceived impacts of agency decisions, and finally, important revisions (or attempted revisions) in the basic statute. (p. 20-21).

This definition is basically a conceptual framework for the implementation process. It comprises of all stages, from policy adoption, enforcement, and administration, to policy output and revision. Hupe (2014) looked at implementation differently, in terms of what happens inside governmental institutions as well as government relations with other actors to carry out public work.

In recent years, implementation studies have decreased and become “out of fashion” (DeLeon, 1999; O’Toole, 2000; Hupe, 2014). Nevertheless, the volume of research in the field is still considerable (Saetren, 2005). According to Schofield (2001), literature about implementation studies could be categorized according to three encompassing themes. The first one concerns key variables affecting implementation and its success/ failure. Some variables listed out by Schofield (2001) include policy nature and type as well as the structures and process of implementation. Another variable is the structure developed before or during the implementation of the organization. This approach is based on the application of organizational theory in policy implementation.

The second theme includes the first-, second-, and third-generation implementation models. The metaphor of generation suggests an orderly and linear development of research. First-generation implementation studies were the pioneer in the field. Thus they were found “less theoretically and empirically oriented” as the main research methodology was qualitative using single case study (Saetren, 2005). Research in this generation did not provide any predictive models but focused primarily on implementation success and failure (Schofield, 2001). The assumptions made in this line

of research were policy process was linear with policy formulation clearly separated from implementation (Schofield, 2001). Similar to first-generation studies, the second-generation ones were criticized for not able to provide a comprehensive approach to implementation issues (Matland, 1995; Ryan, 1995). However, this literature became the ground for the application of implementation analysis in policy evaluation (Ryan, 1995). Unlike the previous two, third-generation research was more empirical and theoretically oriented with an increased number of comparative studies (Saetren, 2005). The unification of top-down and bottom-up implementation models and the institutional approaches to implementation are two schools of analysis that are thought to move policy implementation studies into the third-generation (Ryan, 1995).

The third theme of implementation literature concentrates on two dominant but contrasting approaches, which are the top-down and bottom-up models. The former suggests that policies are formulated by decision-makers at the “top” and implemented by actors at the “bottom” of the hierarchy (Sabatier, 1986). Central government officials are the one in charge of achieving the expected policy objectives (Matland, 1995). This approach is founded in the stages model, assuming that policy formulation is clearly separated from implementation (Schofield, 2001; Hill, 2013). Top-down studies emphasize the importance of clear and straightforward direction in the policies (Koontz & Newig, 2014). The most fully developed top-down model was presented by Mazmanian and Sabatier (1989). They propose that there are 16 independent variables that influence the success of policy implementation. This model is relatively complicated, and, thus, prompts criticism for lacking parsimony (Matland, 1995).

By contrast, the bottom-up approach argues that implementation actors, rather than government officials at the “top”, play the most vital role in policy success (Elmore, 1979; Sabatier, 1986). Research in this area concentrates on implementation actors and their daily decisions and activities regarding the application of policies (Krutwyscho & Bramwell, 2010). The starting point of bottom-up approach is policy targets, from which officials will work backwards to identify the most effective implementers and policy structures (Koontz & Newig, 2014). This approach argues that central government only influences local factors in an indirect way, creating different results at local levels when

applying the same national policy (Matland, 1995). It is policy at the frontline that directly affects the people, thus policy impact needs to be analyzed from the bottom or by analyzing the influence of street-level bureaucrats on implementation. In short, the bottom-up model is a reversal of the top-down one. However, both of them could be used to analyze the problem of discretion and policy outcome.

3.2.2. Discretion and Street-level Bureaucrats

A vital concept in policy implementation is discretion (Evans, 2011; Loyens & Maesschalck, 2010; Hoyle, 2014). Galligan (1990) views discretion as the extent that one's decisions are influenced by his/ her personal assessment. Loyens and Maesschalck (2010) consider discretion as conflicts between general rules and practical issues, or “a flexibility versus uniformity dilemma”. The literature on discretion is abundant due to different interpretations of the concept. For the purpose of this paper, discretion is defined in terms of street-level bureaucracy. It is the autonomy that street-level bureaucrats have in deciding the nature, amount, and quality of rewards and sanctions given to local people during policy implementation (Lipsky, 1980; Tummers & Bekkers, 2014). Discretion occurs when there is tension between managers and frontline officers, or conflict between the control desire of administrators and local resistance (Lipsky, 1980; Evans, 2011). In this research, discretion is defined as the autonomy that street-level bureaucrats have in decision-making regarding the implementation of public policies.

Discretion is important in both top-down and bottom-up approaches to policy implementation. In the top-down perspective, discretion is distrusted (Elmore, 1979). It is considered as a source of freedom that street-level bureaucrats depend on to fulfill their personal intentions (Tummers & Bekkers, 2014). This could lead to a divergence from the policy objectives established by central government (Sabatier, 1986; Keiser & Soss, 1998), which affects the outcome of policymaking and creates negative consequences. Thus in top-down approach, control measures are vital to form “tight boundaries” to discretion, enforcing compliance (Schofield, 2001; Tummers & Bekkers, 2014). On the contrary, the bottom-up perspective incorporates street-level discretion, focusing on the

role of local implementers in policy process. In this viewpoint, discretion is necessary for rules and regulations enforcement and helps to enhance the effectiveness and democracy of policy programmes (Tummers & Bekkers, 2014).

The street-level bureaucracy theory is firmly rooted in the concept of discretion. It concentrates on the beliefs and practices of public service workers at the frontline and their role in public policy implementation (Cooper, Sornalingam & O'Donnell, 2015). The street-level bureaucracy theory was first proposed and has, since then, been influenced by Lipsky's studies. Lipsky (1980) argues that public policy should not be understood from the perspectives of central administrators but street-level officers since policy is, in fact, made at the frontline level. The choices, behavior patterns, and devices that street-level bureaucrats make and use to deal with ambiguity and tension from their daily work ultimately *become* the public policies (ibid). *Street-level bureaucrats* is the term Lipsky use for "public service workers who interact directly with citizens in the course of their jobs and who have substantial discretion in the execution of their work" (ibid). Typical examples of street-level bureaucrats include social workers, teachers, and police officers.

Two factors affecting the actions of street-level bureaucrats are the organizational environment and the cognitive-emotional aspects of individuals (Rice, 2013, p.1039). In other words, street-level bureaucrats are under the pressure of both external and internal factors. They constantly face problems of lacking resources and experiencing constraint from their working environment (Loyens & Maesschalck, 2010). However, as Lipsky (1980) points out, theoretically the demand for public goods that are provided free of charge is limitless. Thus the effort made to allocate resources rationally is never enough, and street-level bureaucrats will always be stressed (Hill, 2015). The public goods problem is irresolvable because the proportion of people could enjoy their benefits is smaller than the number of people in demand and the expectation for the goods quality is usually higher than that could be provided (Lipsky, 1980). It is necessary for frontline workers to develop their own strategy and establish routines to cope with the situation, creating the *informal* policy that sometimes contradicts official policy. It should be noticed that street-level bureaucrats are powerful figures, influencing policy process with

their role as intermediaries between the government and the people. Therefore, with their own discretion, street-level workers could shape the implementation of public policy, creating possible implementation gap.

Although Lipsky's works have generally been considered as support for the bottom-up implementation theory, it is actually a combination of both viewpoints (Evans, 2010). Lipsky (1980) argues that discretion at street-level is necessary for policy to work, but he is also concerned about the level of discretion allowed and points to a need to control it from a top-down point of view. Lipsky (1980) sees managers as key regulators of discretion since they work for the interest of the organization and are capable of providing guidance for the self-interested frontline officers.

3.2.3. Role of Managers in Frontline Practices

Literature review suggests it is possible to control and influence the behaviors of street-level bureaucrats in order to improve service delivery. What should be recognized from these research is that managers, especially those working in the frontline, are the ones who either explicitly or implicitly exert influences on street-level officer performance.

Hill (2006) studies the impact of organizational arrangements on frontline officers' performance. In most cases, the frontline staff is the primary contact with local people. This officers and clients' interaction is structured by job design decided by the local manager (Hill, 2006). Findings in Hill's research show that performance variations across office units could be attributed to decisions of local manager regarding job arrangements.

Riccucci et al. (2004) emphasize the importance of management practices in aligning staff priorities with policy objectives. Lipsky (1980) points out that policy goals are usually compromised due to street-level officers' self-interest. Riccucci et al. (2004) prove that this issue could be tackled by influencing goal perceptions of street-level staffs. The strategy suggested here is to create working conditions that give clear signals to staffs about what the policy objectives are and provide them with resources and incentives to follow this direction. Findings in the research of Ewalt and Jennings (2004) are in line with that of Riccucci et al. (2004). Their study shows that administrative

commitments to policy objectives have a positive impact on staff performance and policy output. Or as Ewalt and Jennings (2004) has written: “when administrators believe in the policy and model that belief, it makes a difference”.

Keiser and Soss (1998) analyze how internal and external factors affect the use of discretion by street-level bureaucrats in the context of child support program. They find that environmental pressures such as state government control could relatively influence the work of frontline staffs. Langbein (2000) points out that the impact of superiors on frontline workers’ discretion depends on the hierarchical distance between two subjects. When they are distant, disagreement among central government officers about the objectives of the policy programmes could create uncertainty in frontline agents, which, in turn, reduces street-level discretion. By contrast, when the hierarchical distance between superiors and agents is small, discretion increases since there is little uncertainty regarding superiors’ goal and preference.

Taking a closer look, Brewer (2005) examines the impact of frontline supervisors alone on policy outcome. The research results show that frontline managers are crucial to building and sustaining a working environment that promotes staff performance and effectiveness. The requirement is that frontline managers have the competency and skills to direct and control their staffs. Managers need to be able to provide motivation for employees, promote diversity in the workplace, encourage performance at all levels, and facilitate sustainable organizational cultures (Brewer, 2005). Nichols, Swanberg, and Bright (2016) also confirm the role of frontline supervisors in enhancing staff performance. By surveying service workers in two US hospitals, they point out that supportive supervisors can improve staff affective commitment and work engagement, reducing turnover rate.

The role of frontline and middle managers are also recognized in other studies. They are in a vital position where they are needed to facilitate change in the organization by creating emotional balancing (Huy, 2002), interpreting and framing new organization policy for their workers (Balogun, 2003; Rudes, 2012). They also have the power to

enhance compliance (Steiner et al., 2012) and positive perception about or commitment with the organization (Reeves et al., 2012; Vickovic & Griffin, 2014).

As a whole, these studies confirm the fact that street-level bureaucrats translate policy objectives into action not in the way central government officers expect. Rather, this translation is subject to a wide range of external and internal influences, which creates the gap between policy objectives and policy implementation. On the other hand, these studies show that street-level bureaucracy could be affected by management practices. Political superiors, especially immediate ones, play an influential role in policy implementation through shaping the working environment as well as guiding and controlling frontline officers.

3.3. Theoretical Framework

A problem in policy implementation that has constantly drawn attention from academics is to understand how the interaction between centralized policymaking and localized implementation hinders or supports the policy goals. In hierarchical policymaking systems such as China and Vietnam, public policies are formulated centrally and implemented locally. Thus local government may experience difficulties when implementing these not-fully-applicable policies (Chen & Zhang, 2016), leading to the implementation gap.

A common explanation for this gap is street-level bureaucracy. When facing both internal and external influences, street-level officers will use their own discretion to decide how to allocate available resources and implement public policies. This is how policy in practice often deviates from the original objectives put forward by the central government (Lipsky, 1980). Therefore, to regard upper levels of authority as the main determinant of policy effectiveness is inadequate (Alden, 2015).

A discussion regarding street-level bureaucracy was given in the previous section. Literature review suggests it is possible to control and influence the behaviors of street-level bureaucrats. From the review, the role of frontline managers is found of the essence in the implementation process. Frontline managers have a major impact on street-level

workers. They have the ability to direct and influence their subordinate staffs, helping them to realign their priorities in line with policy goals, which, in turn, reduces the implementation gap. Moreover, frontline managers serve as a critical link between central planners and local implementers, or in other words, between policymaking and policy implementation. Frontline managers' position is unique as they stay "near the bottom of the organizational hierarchy, but with the authority associated with the management team" (Kras, Portillo & Taxman, 2017).

A lot of research has analyzed the issues regarding street-level bureaucracy as well as possible factors affecting this phenomenon. Recently, the important role of middle and frontline managers as management in the policy process is also acknowledged (Kras et al., 2017). However, insufficient attention was given to the position of managers as frontline practitioners.

Here it is necessary to distinguish between senior managers and local managers. Although both belong to middle management structure, the former is closer to upper levels of authority and responsible for strategic planning in street-level organizations whereas the latter is directly in charge of supervising street-level staffs (Evans, 2016). Local managers have the tendency to act as manager and frontline workers simultaneously. In most cases, local managers have the same or even higher professional capability, knowledge, and job experience as non-managerial staffs do. Therefore, when work is required, they also directly participate in delivering public services. Besides, in a small-sized local organization, the number of staffs is usually limited, and local managers need to handle more duties. In these situations, it is often difficult to separate street-level officers from their immediate managers (Evans, 2016). It would be a critical mistake to underestimate the role of frontline managers and team them up with other types of management.

This study will attempt to fill in the research gap regarding the *dual role* of frontline managers in policy implementation at local level. It is recognized that frontline managers have the ability to influence and direct street-level workers (Huy, 2002; Balogun 2003; Brewer, 2005; Edelman 2008; Reeves et al. 2012; Rudes 2012; Steiner et al. 2012;

Vickovic & Griffin, 2014; Nichols et al., 2016). However, this paper argues that it is not possible to depend on frontline managers to overcome the problem of street-level bureaucracy. A somewhat similar argument has been presented in Evans (2011) in his criticism of Lipsky's ignorance of frontline managers' importance as policy actors. The reason is that frontline managers experience similar pressures and problems as their subordinate due to their responsibilities as policy implementers at the local level. In this way, frontline management could not reduce the implementation gap as expected.

With that focus, this thesis will be conducted to describe and analyze the role of frontline managers in policies implementation. The research will be carried out in Vietnam with a focus on the implementation of alcohol control policies since this topic is currently of public interest. This leads to the second objective of this research, which is to determine whether the street-level bureaucracy phenomenon actually happens in Vietnam. The reason is hardly any literature was conducted in Vietnam in terms of this phenomenon. Understanding about the divergence of frontline officers in the context of Vietnam could bring new insight into the policy implementation gap for the Vietnamese government.

This study therefore seeks to answer the question: How do frontline managers react to policies formulated centrally?

The following sub-questions will guide our research:

1. How do frontline managers apply central policies in the local context?
2. What are the factors frontline managers perceive to hinder/ support them during the implementation of public policies?

To answer these questions, this study will analyze frontline managers in their dual roles. First, as immediate manager of street-level officers, frontline managers influence the policy implementation process. As discussed above, frontline managers experience similar pressures and problems as their subordinate. In his analysis of street-level bureaucracy, Lipsky (1980) considers all levels of manager as one homogeneous group working in the favor of policy objectives. As Evans (2011) points out, Lipsky's viewpoint is that the main issue in policy implementation gap comes from street-level

bureaucrats, leaving out the role manager in his consideration. However, in fact, frontline managers, in the same working environment with limited resources and driven by their own interest, have to answer the orders and expectations of upper-level management, the same way street-level bureaucrats put up with work demands. Thus it is possible that frontline managers, despite being managers, could also exercise discretion during their work as street-level workers do.

Analyzing the application of central policies by frontline managers will help determine if they exercise discretion in their work. With this finding, it will help understand the impact of frontline managers directly on policy implementation as well as on their subordinate, which will indirectly affect implementation. As Lipsky (1980) points out, the discretion and autonomy that street-level bureaucrats enjoy would beguile them when deciding what options to follow.

Second, as street-level bureaucrats, frontline managers have their performance influenced by a number of factors. Some of these factors were identified in the literature review part above. In accordance with the work of Meyers and Vorsanger (2007) as well as May and Winter (2009), they could be grouped into four main categories as follows.

The first type of influences is signals from upper-level of management. Policy intentions could be demonstrated through the way the policy is written as well as guidelines and directions provided by the upper-level management (May & Winter, 2009). To reduce the gap between policy objectives and actual implementation, clear signals from managers to staffs about what the policy objectives are is highly necessary (Ricucci et al., 2004).

The second category of influences is the organizational structure and working environment. They are crucial in providing the tools as well as resources and shaping actions at the operational level. Organizational structure affects the exercise of discretion in terms of job design (Hill, 2006), delegation level from higher management (May & Winter, 2009), task complexity (Meyers & Vorsanger, 2007) and limited resources (Boyne, 2003; Meyers & Vorsanger, 2007; Ugwuanyi & Chukwuemeka, 2013; Heckman, 2015).

The third set of influencing factors is the knowledge and attitudes of practitioners. How do they perceive and translate policies into an action plan? How do they understand the policy? Do they think the policy is necessary and applicable or not?

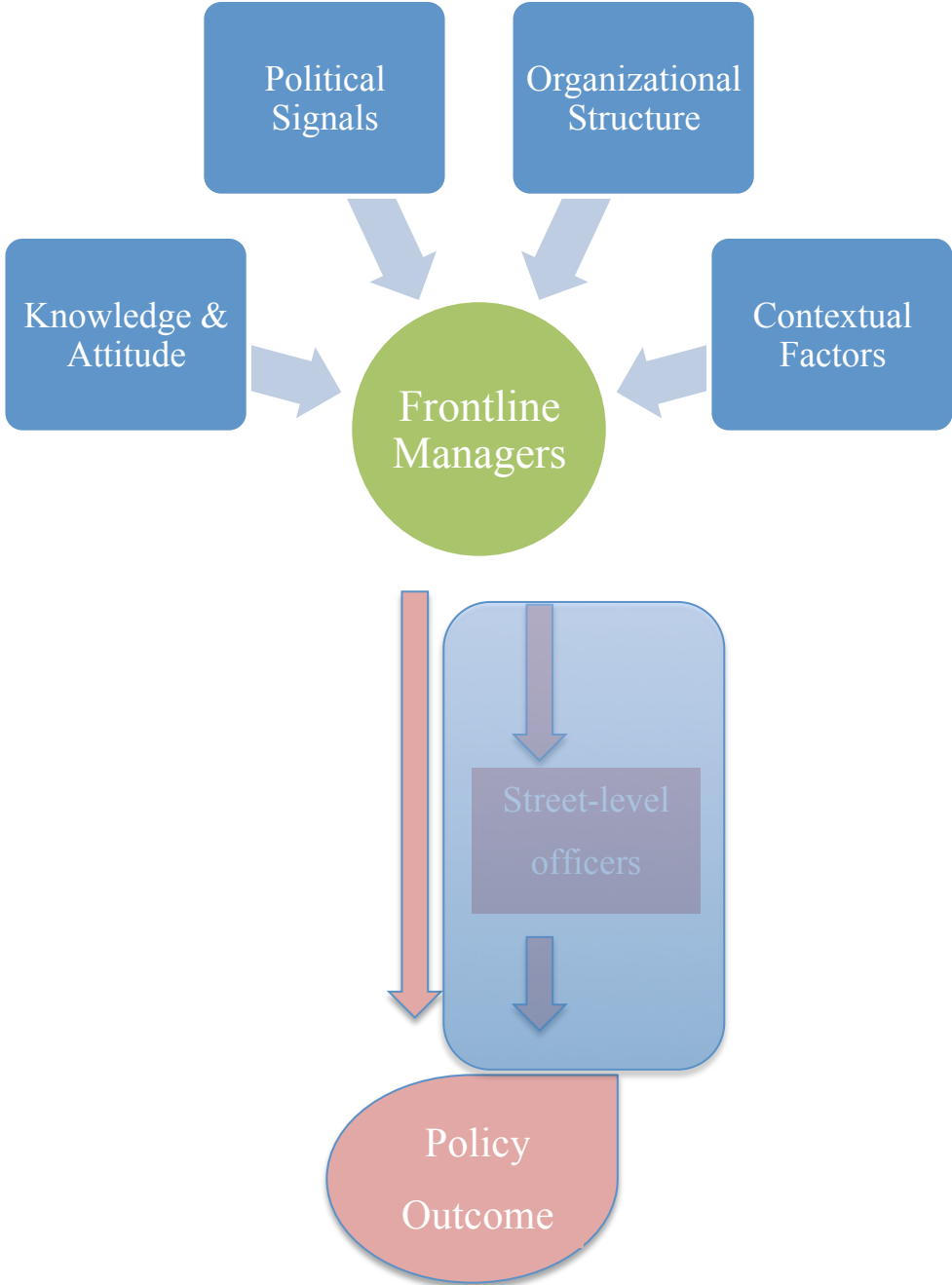
Finally, the fourth category is contextual factors concerning external pressures on street-level bureaucrats. This variable is the most flexible one as it depends on the specific context, which will call for a specific response from officer. Example of this category includes client mix and workloads (May & Winter, 2009).

Considering all aforementioned factors, a simple illustrative framework is created in Figure 3. The framework is designed to give direction to the interviews and discussions in the next sections.

Figure 3 clearly illustrates two levels of influence. First is the influence *on* frontline managers, with four groups of factors. Second is the influence *from* frontline managers toward policy implementation. This influence happens in two ways: one directly on policy outcome when frontline managers act as practitioners and the other indirectly through their subordinates. In this way, frontline managers are not looked at as external actors to the policy implementation process, who are impersonally supervising and directing the street-level public workers. Rather, they are involved in the process while being under the constraint of many factors.

It should be noted that the framework does not suggest a causal relationship. Instead, it presents the influential factors, indicating the link between factors creating the impact and the subject under that impact. Besides, although the framework incorporates the link between frontline managers to street-level staffs, this relationship is not within the scope of this thesis. The reason is many research has approached this issue. Thus it is taken out of the focus of the research, indicated by blurring that part of the framework. The emphasis in this study is placed on frontline managers.

Figure 3. Two levels of influences of Frontline Managers



This research will examine the policy implementation process related to alcohol policies in Phu Tho province, Vietnam. This place is one of the major sources of supply and consumption of alcohol. It is a suitable research place for the topic. To answer the research question stated above, this study employs a case study approach. In-depth interviews with frontline managers in Phu Tho as well as document review are two main sources of data. The analysis is based on the themes identified as well as the research questions and conceptual framework presented in this chapter. The following chapter will present the methodology of this study in details.

4. Methodology

This chapter presents the methods for data collection as well as considerations regarding the limitations and ethical issues of the research.

4.1. Research design

4.1.1. Case study

Case study is the main methodology used for this study. According to Yin (2014), case study is a suitable research design when the research questions seek to answer the *how* and *why* aspects of a contemporary phenomenon as well as to have a thorough and extensive description of the phenomenon. Regarding this research, the main objective is to find out the ways frontline managers react to policies formulated centrally. In addition, the research inquires how they apply the policies in the local context as well as what factors influence their application in their perceptions. As there is few research concerning the dual role of frontline managers in policy implementation, this study aims to provide a description of the situation in hope that this will provide a reasonable background and evidence for further research.

One thing to note about case study is it is an intensive study of a single case (Saldaña, 2011; Elman, Gerring, & Mahoney, 2016). In general, the chosen site for the study needs to represent a larger number of cases (Elman et al., 2016). However, if a case has some unique characteristics, it could be selected purposely to present a focused analysis about an exemplar (Saldaña, 2011). In this research, Phu Tho province, Vietnam, was chosen as the case study site. Phu Tho is a major homemade alcohol supply and consumption source in Vietnam. Thus it offers a rich opportunity to study the implementation of policies regarding homemade alcohol control from production to consumption stage. The case was hoped to bring comprehensive insights into the phenomenon of policy implementation at local level.

For this study, there are two major sources of research data. First are in-depth-interviews with frontline managers in different local government offices. The interviews were

conducted and recorded with the consent of participants. The audio files were then transcribed into word documents for further analysis. Second source is document analysis, which is used to supplement political and social context for the case study.

4.1.2. In-depth Interviews

The primary technique for data collection in this research is in-depth interview as it allows the issues to be explored in depth. As Patton (1987) points out, “we interview people to find out from them those things we can’t observe”.

Study site

As discussed, the study was conducted in Phu Tho province, Vietnam. It was chosen as the case study site since Phu Tho province is a major homemade alcohol supply and consumption source in Vietnam. Studying the implementation of alcohol-related policies in this place could provide an overall understanding of the issues.

Participant selection

The selection of interview participants was based on the following criteria: (1) having a managerial position in local government (2) working with alcohol-related policies (3) language ability in Vietnamese (4) availability and willingness to be interviewed. The participants contacted were not selected on the basis of age, gender, experience, and race.

Although the participants were not selected based on their race, the criteria included the language ability for a reason. Phu Tho is a large province with about 28 ethnic groups. Among ethnic minorities, Vietnamese is only a first or second language. If the participant selected could not speak Vietnamese, it would be more difficult to collect the data and present the findings. The data would need to be translated into Vietnamese first to be analyzed and into English later for presentation. In fear that the data would lose its value and meaning if translation were carried out twice, the participants were required to be able to communicate in Vietnamese. A convenience sampling method was applied due to the time and financial constraint of the research.

At first, ten suitable participants accepted the invitation for the interview. The schedule for the interview was all agreed ahead of time between the researcher and ten interviewees. However, during the time of the research, two participants withdrew due to their personal issues. Thus only eight interviews were conducted.

This sample size is a bit smaller than the normal range of qualitative research, which is from 10 to 50. Nevertheless, as Martin (1996) contends, “the number of required subjects usually becomes obvious as the study progresses, as new categories, themes or explanations stop emerging from the data”. After transcription and preliminary analysis of eight interviews, a decision was made to not invite more participants since the data showed signs of becoming saturated. In addition, time and financial constraint did not allow for another round of interviews with new people.

The characteristics of participants interviewed were as follows:

Table 2 Characteristics of Participants

ID Code	Age	Gender	Education	Workplace	Years of working in the position
IDI 1	52	Male	Vocational degree	Commune People's Committee	2
IDI 2	49	Male	Master	Department of Industry and Trade	10
IDI 3	46	Male	Bachelor	Commune People's Committee	2
IDI 4	48	Male	Master	Department of Health	6
IDI 5	46	Female	Master	Department of Food Safety and Hygiene	9
IDI 6	40	Female	Bachelor	Health service	4
IDI 7	44	Female	Bachelor	Commune People's	7

				Committee	
IDI 8	50	Male	Vocational degree	Commune People's Committee	6

Interview framework

The interview was conducted with a semi-structured approach. The pre-determined set of questions for the interview is as follows:

Background information/ Warm-up questions:

- How long have you been working at the organization?
- How long have you been in manager position?

Local context:

- How many home-brewing households are there?
- How do they produce?
- What ingredients do they use?
- How do they distribute the wine?
- What are the problems with home-brewing activities?

Policies implementation:

	Objectives
<ul style="list-style-type: none"> • How many central policies that are related to alcohol and its control? How many local policies about this? • What are those policies? Please name a few. • What do you think about those policies? • What are their strengths and weaknesses? • What policies are effective/ ineffective? Why/ why not? • What factors hinder/ support your implementation? (i.e. What about political signals/ structure/ contextual 	To find out factors affecting frontline managers

factors/ ...?)	
<ul style="list-style-type: none"> • How do you implement these policies? • What measures are used? (i.e. types of penalty, etc.) 	To find out the implementation measures (discretion)

In addition to these pre-determined questions, probing and follow-up questions were used to encourage participants answering in details. The aim is to explore as much as possible about the issue. These techniques were also employed to suggest the participants about the four factors determined in the theoretical framework (Figure 3).

4.1.3. Document analysis

Although interviews were the primary data collection method, relevant documents were also collected and reviewed. The sources for these documents included legislation, policy documents, newspapers, and research concerning alcohol consumption and control in Vietnam. Document review was not used to construct a detailed analysis but provide insights into the current situation and build a context for the case.

The documents reviewed include the following:

Table 3 List of documents reviewed

Alcohol-related legislation and policy documents	<ul style="list-style-type: none"> • Decree No. 94/2012/ND-CP on wine production and wine trading • Circular No. 60/2014/TT-BCT detailing a number of articles of the government's Decree no. 94/2012/ ND-CP dated November 12, 2012 on wine production and wine trading • Circular 45/2010/TT-BYT on the promulgation of national technical regulations for alcoholic beverages • Decree No. 171/2013/CP On penalties for road administrative traffic offences and rail transport offences
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	<ul style="list-style-type: none"> • Law on Advertising No.16/2012/QH13 (prohibition of advertising wine that contains 15% alcohol or above) • Commercial Law No. 36/2005/QH11 (prohibits promoting and advertising wine that contains 30% alcohol or above) • Law on Excise Tax No. 27/2008/QH12 (amended in 2014) • Decision 2219 by Ministry of Industry & Trade on approval of “planning of trade and distribution network of wine wholesalers nationwide towards 2025, orientation towards 2035”. • Policy to prevent the harmful effects of alcohol abuse until 2020
<p>Reports and research concerning alcohol consumption and control in Vietnam</p>	<p>Bui, et al. (2015) “Alcohol Consumption in Vietnam, and the Use of ‘Standard Drinks’ to Measure Alcohol Intake,” <i>Alcohol and Alcoholism</i>.</p> <p>Dung, N., Rombouts, F. and Nout, M. (2007) “Characteristics of some traditional Vietnamese starch-based rice wine fermentation starters (men),” <i>LWT - Food Science and Technology</i>.</p> <p>Euromonitor International. Alcoholic drinks in Viet Nam. June, 2016 [online].</p> <p>Harms, E. (2013) “The Boss: Conspicuous Invisibility in Ho Chi Minh City,” <i>City & Society City and Society</i>.</p> <p>Health Strategy and Policy Institute (2006). <i>Evaluation Report on Alcohol Abuse in Vietnam</i>. Hanoi, Vietnam: Health Strategy and Policy Institute.</p> <p>Kaljee, et al. (2005). “Alcohol use: an HIV risk behaviors among rural adolescents in Khanh Hoa Province Viet Nam”. <i>Health Education Research</i>.</p> <p>Kim, et al. (2008) “Alcohol Use and Alcohol Consumption–Related</p>

	<p>Problems in Rural Vietnam: An Epidemiological Survey Using AUDIT”. <i>Substance Use & Misuse</i>.</p> <p>Luu, N. B., Nguyen, T. T. and Nguyen, H. L. (2012) “The Drink Driving Situation in Vietnam,” <i>Traffic Injury Prevention</i>.</p> <p>Nguyen-vo T-H (2008) <i>The Ironies of Freedom: Sex, Culture, and Neoliberal Governance in Vietnam</i>. Seattle: University of Washington Press.</p> <p>Nguyen, H., Passmore, J., Nguyen, N. and Pham, C. (2010) “Challenges of drink-driving enforcement in Vietnam,” <i>Injury Prevention</i>, 16 (Supplement 1).</p> <p>Nguyen, M. B. (ed.) (2012) <i>METHANOL VÀ NGỘ ĐỘC METHANOL</i>, Binh Duong Health Department.</p> <p>Nguyen, et al. (2012) “Alcohol Reform in Viet Nam,” <i>Applied Health Economics and Health Policy</i>.</p> <p>Tran, et al. (2016) “Alcohol abuse increases the risk of HIV infection and diminishes health status of clients attending HIV testing services in Vietnam,” <i>Harm Reduction Journal</i>.</p> <p>World Health Organization (2004). <i>Global Status Report on Alcohol</i>.</p> <p>World Health Organization (2011). <i>Global status report on alcohol and health</i>.</p> <p>World Health Organization (2014). <i>Global status report on alcohol and health 2014</i>.</p>
<p>National reliable newspaper (e.g. Tuoi Tre News,</p>	<p>Recent articles (since 2010) concerning alcohol poisoning in Vietnam</p>

4.2. Data collection

The primary data was collected through qualitative interviews. It was the most suitable collection method since it allowed the researcher to explore the issues of policy implementation in details. This part describes the data collection process.

Interview settings

Interviews were carried out face-to-face in the offices of the participants for convenience. On average, the interviews lasted around 60 minutes. The length of the interviews depended on the level of experience as well as the engagement of each participant. All interviews were audiotaped with the consent of the participants. Before conducting the interview, all participants were given all information to guarantee the informed consent aspect in research ethics.

Transcription

Transcription of interview records into word documents was carried out right after the data is collected. The transcription was then checked for accuracy by comparing it with the recording. It was meant to assure the quality of data analysis in the next step.

Limitation

The limitation of the data collection methods was the language barrier. The interviews were carried out in Vietnamese since it was the participants' mother tongue language. Using Vietnamese made the participants feel more comfortable in sharing their experience and knowledge. However, this research needed to be presented in English. Therefore, challenges with language translation might affect the findings.

To overcome the language barrier, the translation was conducted after data analysis. What was important and used in the description of the case study was translated into English by the researcher. In this way, the translation process is less time-consuming. In

addition, the original meanings of the texts and phrases would be maintained. If the translation were carried out before data analysis, the contents would be altered due to the differences between two languages, which, in turn, might affect the findings in some unexpected ways.

Another limitation of this study is that the sample size is a little bit smaller than the standard size, which could affect exploration and identification of themes. However, after transcription and preliminary analysis of eight interviews, the data showed signs of becoming saturated. Thus a decision was made to not invite more participants. Even so, the larger sample sizes would help strengthen the writing of the case study.

4.3. Data analysis

Data analysis means searching for meaning systematically in order to communicate the lesson learned to other people (Hatch, 2002). In qualitative research, it is one of the most ambiguous tasks as each study is “contextual” and “case-specific” (Saldaña, 2011). As Stake (1995) points out: “Good research is not so much about good methods as much as it is about good thinking” (p. 19). To be able to analyze the data from qualitative research, first, it is important to know how to think qualitatively.

It is noted that humans perceive the natural world through the construction of different patterns (Saldaña, 2011). A qualitative study explores the phenomenon by learning about the ways people making sense (Stake, 1995). As such, to think qualitatively is to make sense of different patterns of the situation being studied. In qualitative data analysis, this means to organize and construct patterns out of the vast amount of information collected from interviews, documents, and other available data (Saldaña, 2011). Beuving and Vries (2015) suggest unitizing the materials by “distinguishing and delimiting meaningful units” in them. For this reason, the first step in data analysis should be to reorganize raw data and identify the similar as well as contradicting information, breaking them into primary pattern units. After *patterns* of information are recognized, they should be categorized. Here, all data units are sorted and grouped together according to their meaning, and then the groups are labeled or coded (Beuving & Vries, 2015). The purpose

is to better understand the primary characteristic of each category and the interrelationship between these meaningful groups (Saldaña, 2011). According to Saldaña (2011), interrelationship is how the information patterns and categories “interact” (i.e. how they influence one another) and “interplay” (i.e. what is the relationship structure of these categories, e.g. hierarchy, sequential, etc.). Besides, it should be taken into account that the relationships could be either between data units within a category or between the categories (Beuving & Vries, 2015). Comparing and integrating categories will discover the interrelationship as well as new categories and gradually reveal major theories for the study. In summary, qualitative data analysis process is examining data so that researchers could be able to “see patterns, identify themes, discover relationships, develop explanations, make interpretations, mount critiques, or generate theories” (Hatch, 2002).

It is crucial to remember that in qualitative research, analysis takes place at the same time as data collection and management (Saldaña, 2011). Researchers could take note of any noticeable details found in the data document while transcribing interviews or filing documents. This will help researchers to become *intimate with data* (Esterberg, 2002; Saldaña, 2011), which makes them more familiar with the data contents.

In this study, the strategies used for data analysis are as follows:

Reading the data: The interviews and notes were reviewed to become *intimate with data* as suggested by Esterberg (2002) and Saldaña (2011).

Coding: Coding was employed to organize the data into logical categories. Here the method is *in vivo coding*, using “significant or summative” phrases of the participants as a code (Saldaña, 2011). The codes were then listed in order for analyzing and grouped into similar categories. Each interview was coded and categorized separately.

Comparing data: By comparing the data in the categories, the key themes of each interview were identified. These key themes were used for comparison across interviews so that the broad themes between interviews were identified. The cross-interview themes were used to describe the perspectives of participants and analyze the phenomenon.

The comparison process was carried out until “one single, increasingly clear theoretical perspective will crystallize that organizes the remaining categories, and the episodes and incidents subsumed under each one of them, into a meaningful whole” (Beuving & Vries, 2015). The reason is at this point the findings are ready to be presented.

4.4. Ethical Issues

4.4.1. Informed consent

Informed consent has been recognized as an integral part of ethics in conducting research. Informed consent means that the researcher is required to clearly and completely inform the participants about all aspects of the research (Sanjari et al., 2014). Taken this into account, this study guaranteed that all participants were informed in Vietnamese the following issues: the nature of the study, the identity of the researcher, the research objective, the participant role, and how the result will be used.

4.4.2. Permission and Confidentiality

Permission was requested to record the interviews prior to the interview. In any cases that participants refused the request, their decisions were all respected.

Anonymity was promised to participants before conducting the interviews. For this reason, all information related to the participant’s identities would not be disclosed. In the presentation of study findings in Chapter 5, participants are referred to as IDI 1, IDI 2, etc. when specifically identified in the text.

4.4.3. Role of Researcher

An important distinction between qualitative and quantitative research that needs to be acknowledged is the researchers’ role. In quantitative research, the role of the researcher is neglected since data is considered as “existing independently and indifferently” with no relation to the person collecting them (Fink, 2000). In qualitative research, the researcher actively takes part in every stage of the process (Sanjari et al., 2014). It is not unexpected if the qualitative researchers feel emotionally and personally attached to the study, which

makes their role quite complex (Fink, 2000) and raises a range of ethical concerns (Sanjari et al., 2014). The ethical issues often emerge from the researcher-participant relationship, the close connection between the qualitative data collected and the collector (which is also the researcher), and the way data is processed and presented. The role and involvement of the researchers, as well as their own knowledge and perception, could influence the research result considerably. Thus, it is crucial for the researchers to consider their own biases and viewpoints throughout the research process.

This required me, as the researcher in this study, to keep reminding myself about my own biases. First of all, my professional experience may bias my data and interpretations. As a government officer, my personal empathy with my *colleagues* in other public organizations could help the participants feel more at ease to share their stories. This emotional relationship could also interfere with my interpretations of the data later.

In addition, this is the first time I attempt to conduct a qualitative study. Despite reading books and literature to enhance my understanding about the research methodology, I cannot guarantee my inexperience would not affect the quality of the research since the role of the researcher in qualitative research is quite prominent.

All in all, I acknowledge that all finding interpretations and themes identification of the research depend upon my own perspectives, understanding, and personal opinions about the matter of concern. In order to prevent my perception interfere with the finding, I allow the data to tell its own story by using in vivo coding in data analysis. Using the own words and phrases of the participants, the themes identified are the closest to the original data. Only until all key themes are recognized, the conceptual framework was referred to conclude and present the findings to answer the research questions.

Chapter 4 presents the methodology of the research. The thesis employs a case study approach to analyze the policy implementation issues. The case of alcohol control policies in Vietnam is expected to provide insights to the study of implementation gap. Besides, the country profile would bring more understanding to the problems since

previous research are mostly carried out in Western and developed countries. The next chapter will provide the analysis of the data collected for this thesis.

5. Findings

The purpose of this research is to describe and examine the role of government managers in policy implementation at the frontline level and to identify if the street-level bureaucracy problem could be found in Vietnam. To be specific, two research sub-questions are formulated to guide this study:

1. How do frontline managers apply central policies in the local context?
2. What are the factors frontline managers perceive to hinder/ support them during the implementation of public policies?

During in-depth interviews, the participants were asked to describe their working environments, personal experiences regarding the implementation of alcohol-related policies, and their recommendations for more effective policy implementation. Using the combination of the provided information, the research is able to identify a number of factors that influence frontline managers during policy implementation. In addition, their answers reveal how they apply the policies in their work. For reporting purposes and to protect participants' identities, each participant will be referred to as IDI 1, IDI 2, etc.

In this section, the research findings will be presented based on the analysis of the interviews as well as document review. The analysis result is organized as follows. First is a brief introduction about the Phu Tho and the current status of homemade alcohol production there. The aim is to explain the local context of the study in order for a better understanding of the research result interpretation, which will be presented in the second part. Next are the main findings of the research presented according to the themes identified after analyzing the interview responses and in the order of two research sub-questions.

Finally, a discussion about the research findings will be presented in order to state the interpretations and opinions about the findings as well as to analyze how the findings fit with the theoretical framework developed in Chapter 3. For this research, a conceptual framework is created from reviewing previous literature (Figure 3). In the discussion, the

framework will be referred to since it is necessary to enhance the theoretical understanding of the research.

5.1. Local context

This section provides some general information about Phu Tho province, where the study takes place. Furthermore, it briefly describes the findings from frontline managers about the current situation regarding homemade wine production and distribution in the province. The aim is to explain the local context of the study in order for a better understanding of the research result interpretation, which will be presented later in this section.

Overview about Phu Tho province

Area: 3,533.3 sq. km.

Population: 1.4 million (in 2015).

Administrative divisions:

- 1 city: Viet Tri
- 1 town: Phu Tho
- 11 districts: Ha Hoa, Thanh Ba, Doan Hung, Lam Thao, Thanh Son, Yen Lap, Tam Nong, Thanh Thuy, Phu Ninh, Cam Khe, Tan Son

Ethnic groups: Viet (Kinh), Muong, Dao, San Chay...

The study was conducted in Phu Tho province. It is located in the North East of Vietnam. Phu Tho has long been regarded as the birthplace of the Vietnamese race in the national myths.

Phu Tho is most famous for its tea production. At present, total area used for tea planting is about 16.7 million ha. In 2016, tea production reached 103.8 tons/ ha.

1.1. Homemade wine products

Phu Tho is also known as a famous source for homemade wine to Vietnamese people. However, until now there has been no valid statistics about the number of home-brewing households in the province. It is due to the seasonal and spontaneous nature of this activity.

Every village has home-brewery household, but we do not have any statistics on the activity – IDI 4

At present, the province has 8 establishments producing industrial alcohol; the number of home-brewing household about 3,000, fluctuating due to seasonal nature of the work – IDI 5

[Home-brewing is] few and far between, for small business. – IDI 2

The number of households participating in alcohol production varies among communes. Some communes only have a small number of home-brewing households:

There are 1084 households in the whole commune, of whom about 22 households produce alcohol according to incomplete statistics because many produce for their families only, whereas these 22 are doing business – IDI 1

There are about 20 households producing alcohol but not much, mainly for animal husbandry – IDI 3

1.2. Homemade alcohol production

The ingredients used in alcohol production process in home-brewing households mostly comprise of agricultural produces such as rice and cassava as well as certain types of yeast.

Raw materials are rice and yeast fermented for 7 days then use for production – IDI 3

Mainly producing at home using ordinary and sticky rice ... Bac yeast¹. Before that, people used Chinese yeast, but after drinking there were headache signs so it was no longer in use. Now [they] use yeast from Vietnam. – IDI 1

These are common ingredients that are quite easy to find in Vietnam, but their qualities are usually questionable due to unknown place of origin. The production process of homemade wine is also of doubt since most home-brewers produce wine using their own experience and knowledge imparted by the elders in the family².

People mostly produce wine using their own experience, without any knowledge about alcohol and hygiene issues. Raw materials are used without any concern about hygiene and food safety. Before, they bought yeast for alcoholic fermentation from Ha Bac³, but now where they get the yeast is difficult to know. The fermentation process is unhygienic, which poses a risk of chemical contamination and impurities. In some households the production is very unhygienic as the work takes place right next to pigsty, or the quilts they use (for controlling the fermentation temperature) are very dirty. – IDI 4

1.3. Homemade alcohol distribution

In Phu Tho, homemade wine could be distributed to large restaurant as well as little shops quite easily. They could also be sold directly to people in the neighborhood.

Some households only sell their products to people in their neighborhood or make delivery to grocery stores (any stores will work). Wine could be bought anywhere, from big restaurants to small shops. Recently, many people tend to use their

¹ Vietnamese terms for yeast made from a mix of various herbs.

² For some families, winemaking is a traditional work passed through generation. It is believed that long tradition brings knowledge and experience to the winemakers. Thus their products have better and more unique taste.

³ A province of Vietnam from 1962 to 1996, which was divided into Bac Giang Province and Bac Ninh Province from 1996.

relationship with the wine-makers in order to buy large quantities for storage. –
IDI 4

They mostly produce in small numbers to address the needs of local commune and neighboring communes or for small businesses (grocery stores, small eateries). –
IDI 5

They (i.e. the wine-makers) can sell about 20 – 30 liter per day to small grocery stores– IDI 3

Homemade wine is favored by many Vietnamese people due to its cheap price. According to participant IDI 3, the average price of homemade wine sold in Phu Tho is about 15,000 – 20,000 VND per liter (about 0.66 – 0.88 USD/ liter). Another reason homemade wine is popular with local people is that they *trust* the origin of the wine:

People seem to think that there are many fake products that look similar to the ones made in factory and could cause alcohol poisoning. Thus they think that buying homemade wine is better since they are sure about the origins (who make the wine). They believe that keeping the wine from several months to a year could remove any toxic substances and make the wine taste better. Drinking without feeling of a headache. That's why people still prefer homemade alcohol. – IDI 5

This is an interesting point since generally, homemade wine is believed to be the main cause of alcohol poisoning due to unknown place of origins and questionable production process. However, it seems that homemade wine is widely trusted by local people since they feel more secure using products that they know clearly made by whom. This different perspective could explain why homemade wine is ubiquitous in Vietnam.

In summary, the quality of homemade wine is a controversial topic. The ingredients and production process of homemade wine are questionable. However, it is still widely sold in many places, from restaurants to small grocery stores. Homemade wine is popular among local people for they believe it is from reliable source.

The production of homemade wine is characterized as seasonal, spontaneous, and irregular. However, this practice is of no surprise in an agricultural country like Vietnam. It is normal for people living in rural areas to have various side jobs, especially when the job is highly paid and does not require full time commitment. They can work at their convenience or when they have free time after the harvest. As winemaking is a rewarding side job, local people who have experience or some knowledge about winemaking could become a winemaker of their choice. Since it is only a side job and most families can only produce at a small scale, winemaking is seasonal and irregular, few and far between.

In this situation, how frontline managers could control and supervise the production of homemade alcohol as well as its consumption is an interesting question. The next section will present the perceptions and handlings of frontline managers regarding the implementation of policies related to alcohol control.

5.2. Implementation of alcohol-related policies

This section describes in details the analysis of the interviews with regards to the research questions. Two main themes emerging from the data are the way participants implementing the policies and factors affecting the participants in implementing policies. While the themes are reported discretely here, participants during the interview often addressed more than one theme in the same response and repeated the same examples in answers to other questions. In those cases, the interview responses will be presented the way they best explain/ support the themes.

5.2.1. Implementation measures – Discretion

The purpose of this study is to understand the impact of street-level managers on the implementation process of public policies and find out whether Vietnamese government officers exhibit street-level bureaucracy behaviors. As discussed, one important aspect of the street-level bureaucracy is discretion. In this research, discretion is defined as the autonomy that street-level bureaucrats have in decision-making regarding the implementation of public policies. In the role of manager, street-level managers have

more voice and power in decision-making than their street-level subordinates. This power comes officially from their position.

To answer how frontline managers implement central policies in local context, the participants were asked about their application measures. All participants indicated that it was difficult to apply the alcohol-related policies. The terms pointing out that the implementation of these policies were difficult or cannot be applied appear throughout the responses. The terms such as “difficult” and “hard” appear about 22 times while “cannot be applied”, “not possible”, “not applicable”, and their equivalent appear 13 times. The participants mentioned various causes for the difficulties in implementing alcohol-related policies such as limited resources, impractical policies, and noncompliance of local people. Due to these issues, some of the participants indicated that they “don’t really want to apply the policies” or “could not make it effective”.

One participant, IDI 3, observed that personal relationships as well as the close-knit nature of local community makes it challenging for them to implement the laws. He pointed directly to the implementation of Directive 26 of Prime Minister. The Directive forbids government officers to drink wine and alcoholic beverages during office hours. According to IDI 3, he could not follow the rules because the persons violating were all his fellow workers, or as he referred to, “his brothers”, and elders in the village that pressed him to join in.

It is difficult to prevent drinking alcohol during working time since we’re all brothers. It is also difficult because if we have sit with the elderly in the village, refusing to drink is impolite; thus not allowing officials to drink during work time is not possible – IDI 3

It is similar in the case of IDI 7. He stated that it was not practical to apply the policies because he needed to keep the relationship with his subordinates.

How can we be strict about this? We all know each other. They could be the wife or father of my subordinates. It would be bad since we’ve worked together for a long time. It would affect the work later. – IDI 7

Regarding penalties for violating behaviors, some participants indicated that they could go easy on the violators by not giving the penalty or just giving a light one. For example, participant IDI 6 stated that he could not perform his duty according to the requirements because the local people “are all my neighbors”. His easiness was further supported due to a lack of strict punishment mechanism.

We want to check if they are registering the activities as required, and most of them did not get the license [...]. But it is difficult for any punishments because currently there isn't any clear mechanism for doing so. Besides, they are all my neighbors. – IDI 6

As described in the previous section, the nature of home-brewing activity is irregular and seasonal. Thus to IDI 8, strict penalty is possible but not effective. In this case, discretion was used to avoid conflict in the workplace.

They only work seasonally, not all year round. We can try to have some strict measures, but it is no use. They can just stop making wine [...], so no use in being so strict. They could create a lot other troubles. Normally it is better just let them go with a warning. – IDI 8

Similarly, from IDI 4 response, it is found that educating the people about the requirements in the law is a preferable method rather than introducing any penalties.

[...] Educating them is better than punishment. Besides, what kind of punishment could we use? It is not possible to sentence them for doing business... Just need to remind them about the (wine production) license requirement since the laws require that. – IDI 4

By analyzing participant response above, some aspects about discretion are identified. According to Lipsky (1980), street-level bureaucrats also exercise discretion by deciding who receives benefits/ sanctions and how the benefits/ sanctions will be carried out. A simple example is policemen for they have the power to decide who to arrest and who to let go. Another example is judges. They decide how much and how long one could be

sentenced because of his action. The research results show that a similar practice is found among frontline managers. When implementing alcohol-related policies, participants often encountered noncompliance of local people. However, they often decided to let the violators go without a penalty or use only a light measure such as warning or educating. The signs of discretion are also found in the participants' reluctance and avoidance in implementing the policies.

In short, despite being in managerial position, frontline managers could exercise discretion to cope with pressures from his external environment. What these pressures are will be presented in the following part.

5.2.2. Factors affecting the implementation of public policies

This theme refers to factors that have an impact on the work of frontline managers in implementing public policies. From participants' responses, this part is divided into small sections based on four factors in the theoretical framework in Figure 3.

Knowledge and Attitude

The implementation of public policies is influenced by the knowledge and attitudes of the implementers. In this research, although a number of participants showed that they were aware of a number of alcohol-related policies, there were still a few who displayed little awareness.

When asked to name some national and local alcohol-related policies that they knew, most of the participants could list a few names. Decree No. 94/2012/ ND-CP on wine production and wine trading and Circular No. 60/2014/TT-BCT detailing a number of articles of the government's Decree No. 94 are the most recognized legal documents.

Decree No. 94/2012/ ND-CP dated November 12, 2012 on wine production and wine trading (in replacement of Decree No. 40/2008/ND-CP dated 07/01/2008 on wine production and wine trading. Circular No. 60/2014/TT-BCT detailing a number of articles of the government's Decree no. 94/2012/ ND-CP. Directive 13

– CT/TW dated 10/06/2013 of Phu Tho province about improving management and supervising smoking and drinking activities during weddings and funerals. Some documents of Phu Tho Department of Industry and Trade about wine production at provincial level. – IDI 2

Decree No. 94, Circular No. 60 of Ministry of Trade (in replacement of Decree No. 40 on wine production. Phu Tho has some guideline documents from Department of Industry and Trade or Decision No. 1345/UBND establishing administrative procedures to certify safety products. – IDI 5

The formulation of National Technical Regulation for alcoholic products is expected to help increase the effectiveness of quality management of wine products and reduce the number of poor quality wine on the market. It also brings about consistency with the requirements of free trade agreement that aims to protect consumers in the country. The application of the National Technical Regulation for alcoholic products could provide Phu Tho with a standard to evaluate quality of homemade wine. However, some participants indicated that they had only heard about the documents.

[...] Have heard somewhere about the National Technical Regulation, but that's all. We don't have the equipment. And most families make wine for their own use, so no one would test that. – IDI 7

A few participants indicated that they were not aware much of documents or regulations related to alcohol production requirement and standard. They only knew of documents restricting the use of alcohol.

There aren't any documents related to wine production. I don't see anywhere this issue was mentioned... only regulations restricting the use of alcohol in traffic and about its hazardousness to health. – IDI 3

Concerning attitudes, analyzing the answers of research participants showed that all participants were reluctant to apply the policies. According to them, it is difficult to implement the policies since they are all subject to a number of weaknesses.

IDI 5 said that the policies were not practical since the measures were not suitable. Each subject would need different measures to help him or her understand the laws and comply with it. He gave an example of Directive 13 about regulating smoking and drinking activities during wedding and funeral. The Directive was applicable to educated people. Other subjects who consumed a large amount of wine were not affected by the documents. About Decision 89, it was not effective since administrative penalty were too light.

Directive 13 is implemented in the whole province and applicable to all public officials and employees as well as general workers, but its effect is limited to group of educated people. A large number of other wine consumers are not affected by this... Decision 89 about administrative penalty is not practical because it is just administrative sanctions. – IDI 5

In another cases, the policies are not implemented since the conditions are not applicable or the administrative procedure is complicated to local people and not suitable for their business conditions. For example, IDI 1 pointed out that Decree 94 only regulated home-brewing households in trade villages. Thus it was difficult to follow the documents since the conditions to apply the legal clauses were not applicable in the local context.

Decree 94 has some clauses regulating the activities of home-brewing households in trade villages, but here we are not acknowledged as trade villages. At present, standards for evaluating homemade wine are not clear yet. – IDI 1

Similarly, IDI 8 and IDI 6 also indicated that it was challenging to implement the Decree 94 since the administrative procedure is complicated and contradicting between different legal documents. To have the rights to produce wine, Decree 94 requires the people to register for their wine production business with local authorities. However, the procedure for this type of registration is complex since to have other certificates and registration are a prerequisite for wine production registration.

Implementing Decree 94 is not practical because in another document, it states that only business establishments could have wine registration. It is not easy for

home-brewing households to have that because the requirement is to have food safety and hygiene warranty certificate first, which requires other conditions to obtain. And because they only work seasonally and irregularly, for small business, we can't supervise their activities. – IDI 8

In practice, applying the Decree 94 is difficult since their businesses are so small. The required procedure is complicated and time-consuming. To have local people voluntarily register for their business and the food safety and hygiene warranty certificate is not possible due to their emotional states. They are afraid of complicated and nuisance procedures. They don't know where to go and who to meet, or afraid to pay more taxes so they've to increase the prices so they can't sell the products easily. Local people don't comply with the rules due to these reasons. – IDI 6

Political Signals

When policies are formulated centrally, it would be normal for practitioners to look for guidance from the upper-levels. In all situations, the immediate managers are the ones who play a crucial role in communicating with the central management and providing direction for their subordinates. In this research, the subjects are managers in the commune level of government hierarchy. Thus their immediate management in discussion here is the one in provincial level, not their superior in local government.

According to Riccucci et al. (2004), immediate managers' guidance helps street-level bureaucrats perform in line with the policies. The analysis for this research indicates similar findings.

In the previous part, the attitudes of participants towards the implementation of alcohol-related policies are reluctant and somewhat negative due to impractical and unsuitable terms and conditions in the legal documents. However, from the interview response, it could be seen that the guidance and strict management of the upper-level authorities could make a difference.

The regulations restricting the use of alcohol among members of the community, especially officers and Communist members, were perceived to be effective by the majority of participants. The reasons for this were strict penalties for breaking the rule and strong commitment from the provincial level.

After the directive is introduced, the rate of drinking in my place, especially among Communist members, reduces significantly, almost to zero (no one drinks in the morning or afternoon). Only a few exceptions. But drinking at night can't be controlled. – IDI 6

It brings benefits to officers such as better health and working relationship. Traffic accidents reduce; accidents at work also decrease. It is effective because it is required in the directive of provincial level; anyone disobeying will receive from light to severe penalties. – IDI 4

Exception for this, they (the upper-level) are so strict about this matter, we cannot be easy this time... we cannot drink for any reasons, social or not – IDI 8

As the commitment from upper-level could have a huge impact on practitioners, lacking that also influence the street-level bureaucrats.

IDI 1 pointed to a possible problem with implementation is a lack of central policy adoption attempt from managers at provincial level.

[...] know Decree 94/2012 of the government about registration requirement for wine production. At the moment there isn't any documents about wine and beer formulated at the commune level; the upper level don't send any [documents] either... don't have the direction to work... – IDI 1

At local level, practitioners could not have a comprehensive and updated understanding about legal requirements to apply in practice when the bridge between them and where the policies formulated is missing. Thus, the gap between the centrally formulated

policies and local implementation practices could be attributed to the lack of action from the intermediary level between them.

Organizational Structure: Limited resources

Organizational structure and working environment are crucial in providing the tools as well as resources and shaping actions at operational level. From the interviews, it could be seen that a number of participants revealed a lack of resources in terms of funding and workforce affecting the implementation of the policies.

The resources are limited. Funding is needed for broadcasting and publishing to increase awareness among local people. It is also necessary to have the resources to build and apply the trade village model to unite all home-brewing households – IDI 5

[...Need funding] to increase investment in the infrastructure and facilities, to build a traditional model of homemade wine production in the community so that supervising can be better – IDI 2

My institution has many difficulties ... lacking equipment and funding for implementation, manpower shortage and lacking competency – IDI 5

A problem that frontline level usually face is lacking implementing resources. There are various factors contributing to this issue. It could be problem with funding allocation of local level. It could be the lack of competent and committed workers. It could be due to the lack of interest and commitment from the upper-level, funding is limited but too much responsibility is delegated.

However, the cause of limited resources is not in the scope of this research. The finding here only confirms that limited resources could also put pressure on frontline managers. This pressure could even more intense that what street-level bureaucrats face. Frontline managers have to deal with limited resources in terms of not only funding but also

manpower and staff competency for the whole organization. Their position requires more responsibilities from frontline managers.

Contextual Factors

Contextual variable is the most flexible one as it depends on the specific context, which calls for specific responses from officers. It is about external pressures on street-level bureaucrats. Two factors that are contextual are identified from the interviews, which are the social relationship with and noncompliance attitudes from local people.

Social relationship

When analyzing the theme about discretion, it is easy to recognize that there is one common factor appearing in all responses quoted. It is the personal relationship with the local people that makes it difficult for the participants to strictly implement the rules. This sphere of relationship comprises of almost all social interactions of a person. Due to the close-knit nature of local community, the people that are subjects regulated by the policies are the one frontline managers meet and socialize with everyday. They are neighbors, elders in the village, or families of colleagues. Besides, the village cultures of Vietnam structure in a way that all people in the same community belongs to a large family. Thus, relationship presents a strong social influence on street-level bureaucrats in this context.

For example, IDI 3 indicated that his fellow workers are “brothers”. In addition, social pressure could come from other villagers such as the elders.

It is difficult to prevent drinking alcohol during working time since we're all brothers. It is also difficult because if we have sit with the elderly in the village, refusing to drink is impolite; thus not allowing officials to drink during work time is not possible – IDI 3

It is similar in the case of IDI 7. He stated that it was not practical to apply the policies because he needed to keep the relationship with his subordinates. In the case of

participant IDI 6, he could not implement the policies because the local people are his neighbors.

We all know each other. They could be the wife or father of my subordinates. It would be bad since we've worked together for a long time. It would affect the work later. – IDI 7

We want to check if they are registering the activities as required, and most of them did not get the license [...]. But it is difficult for any punishments because currently there isn't any clear mechanism for doing so. Besides, they are all my neighbors. – IDI 6

Noncompliance

Besides social power, local people also have the power to influence the implementation process of policies with their noncompliance. Analyzing the responses of participants showed that most of them discussed about the difficulty with noncompliance of local people.

According to IDI 4, the cause of this phenomenon was due to the perception and habit of local people.

... Some barriers such as low level of awareness about the harmfulness of alcohol and the habit of drinking alcohol in the community. At the moment, the legal system hasn't any impact on the producers and distributors. Besides, education activity is still lacking, so can't help people to become more aware of alcohol use – IDI 4

Similarly, IDI 8 pointed out that local people were not aware of the negative impacts of alcohol abuse. In addition, home-brewing households did not register for their activities since they believed it was unnecessary and redundant to do so.

People don't think drinking could bring any harms to them. After all, they've been drinking for so long, even their parents... The registration process is complicate.

It makes the local people reluctant to do so. Their business isn't regular. So they don't want to go through all troubles to get just a paper. It doesn't make any differences to their work. – IDI 8

IDI 2 and IDI 6 also pointed out the nature of home-brewing business influenced local people's compliance. Since the business was simple and small, going through the whole registration process was time consuming and provided no extra benefits.

There are still many difficulties in the implementation process. Most home-brewing places, the owner don't have the wine production certificate since their businesses are small and passed down from family generation to generation. Retailing is very simple. The wine is measured in liter and sold to the buyer; the price fluctuates due to the price of ingredients. – IDI 2

The people don't want to register their production activities because the procedure is complicated and requires too much paperwork. Their business is so small. Having the certificate doesn't bring any good either. The requirements are only applicable for companies. – IDI 6

The previous parts present the analysis of the research interview. The local context of the study site is explained using the information provided by the participants. Next, the practice of discretion among participants is examined. Besides, some factors affecting the implementation work of the participants are identified. Presenting the result of the analysis is the first step. In the next part, these findings will be discussed further in order to understand their implications for the research and whether the research questions posed in this study could be answered.

5.2.3. Discussion of the findings

The purpose of this part is to state the interpretations of the research findings presented in the two parts above and explain their implications for this research. The discussion will connect to the research question and the literature review to see if the research has been able to bring new understanding to the street-level bureaucracy problem.

The first part of the research findings section introduces the local context of the study site. The aim is to help enhance understanding about the settings and provide insights for the findings. It can be said that the situation concerning homemade wine production and consumption in Phu Tho is quite perplexing. Home-brewing activities are carried out for small business and retailing directly to the consumers in the community. The problem is that wine production is only a side job of local households. They do not work regularly but seasonally. Thus, the specific number of local people participating in wine production could not be estimated.

The implementation of policies regulating the production and consumption of alcohol in local context seems to be challenging. From the perspectives of public managers at the local level, many factors hinder their work. The factors are both internal and external.

The internal factors that influence the implementation of public policies are knowledge and attitude of the implementers. In this research, although a number of participants showed that they were aware of a number of alcohol-related policies, there were still a few who displayed little awareness. Here the knowledge and expertise of the participants are not evaluated since it is a complicated subject and is not within the scope of this research. Thus, awareness is used as a substitute since it is the simplest indicator of knowledge. Concerning attitudes, the majority of participants displayed reluctance in implementing alcohol-related policies since they regarded the policies as impractical. The reasons were attributed to the external factors discussed above. Besides, the complexity of the alcohol-related policies could have an impact on the implementers.

External factors include lack of guidance from the upper-level, limited resources for implementation, social relationship, and noncompliance attitudes from local people. These are identified directly from the interviewees' answers to the difficulties they face during policies implementation. Some factors identified in this study are also recognized in other research.

In this research, it is found that when the provincial level emphasizes the importance of implementing one specific policy and establishes strict regulating measures (i.e.

penalties), the participants attempt to implement the policy in a more serious manner. On the other hand, the participants express more reluctant attitudes for other policies since they lack guidance and supervision of the superior level. This is in line with some previous research. For example, Riccucci et al. (2004) point out that clear signals from the upper-level are important to provide direction to staffs so that they could act in line with the policy objectives. Similarly, Ewalt and Jennings (2004) show that administrative commitments to policy objectives have a positive impact on staff performance and policy output.

In terms of organizational structure, the majority of participants indicated that lack of resources hinders their implementation of alcohol-related policies. A number of previous research also point out that this factor could influence the effectiveness of implementation process (Meyers & Vorsanger, 2007; Ugwuanyi & Chukwuemeka, 2013; Heckman, 2015). The impact of resources on policy implementation could be understood in the simplest form, which is the more resources public organizations have, the better the results they could bring (Boyne, 2003). In addition, it is easy for a public program to be abandoned due to lack of resources (Bolaji, Campbell-Evans, & Gray, 2016). Limited resources factor belongs to the second type of influence identified in the conceptual framework in Figure 3: organizational structure.

Another category of the conceptual framework is contextual factors, which concerns external pressures on street-level bureaucrats. This variable depends on the specific context where the policies are implemented in terms of client mix and workloads. In this case, two factors that could be categorized into this group are social relationship and noncompliance of local people. These factors are found presenting challenges to frontline officers in their work. However, little is found in the literature regarding these factors.

About noncompliance, this factor having an impact on policy implementation is quite obvious with reasoning. When the target subjects of the policies display opposition, they would resist the change that the policies bring, create a difficult working environment for, and put pressure on the implementers. To what extent the opposition of local people influence the results of the policy implementation would need further research to

evaluate. However, it is possible to argue that this resistance is simply a sign of ineffective policy implementation. If the policies were effective, they would be able to change the behavior and attitudes of local people. This makes noncompliance attitude to policy implementation of local people an interesting subject. Its impact on policy implementation works in a causal loop.

Regarding social relationship, it is a special and unexpected factor in this research. The influence of this factor comes from the impact of local culture on its people. According to Hofstede cultural dimension, Vietnam is a collectivistic society. In collectivistic society, people belong to “in groups” and foster long-term relationship with every member of the group (Hofstede, 2001). This phenomenon was confirmed in the research as the participants identified local people as their brothers or close family. The impact of social relationship could also be explained in terms of social psychology. According to Nolan et al. (2008), the behavior of a neighbor could have a strong effect on an individual, and minority group members could have an impact on the group decisions. Thus, it is possible for local people to exert influences on frontline managers when they all belong to a close-knit community.

It could be seen that all aforementioned factors, although reported as discrete ideas, do not affect the policy implementation process discretely. Instead, these factors interact and influence one another. Lack of guidance from the upper-level could mean no resources from above would be distributed for the policy implementation since the policy importance is underestimated. On the other hand, the limited resources and noncompliance of local people could make frontline officers feel challenging when implementing the policies. At the same time, lack of guidance from the upper-level, together with social pressure, creates a perplexing situation for policy implementers. These factors affect the attitude of implementers and make them feel “difficult” carrying out the regulation terms. The interrelatedness of the factors was shown in the answers of participants, where the themes overlap with each other more than once.

In this context, frontline managers, similar to street-level bureaucrats, have the signs of exercising discretion. They could choose light penalties for the violators or ignore minor

violations of the laws. They could decide not to apply the policies in some cases. In this sense, the gap between the policies and its practices open up.

In the account of Lipsky (1980), managers play a key role in regulating and constraining street-level discretion. They decided at what moment discretion is legitimate or illegitimate, working in the best interest of the organization. In Lipsky's work, managers are one group and street-level bureaucrats are another. It is this aspect of Lipsky's approach that receives criticism from Evans (2011). Evans (2011) indicated that:

He [...] brackets off managers from critical analysis, treating them simply as a homogeneous group, committed to the implementation of organizational policy. He consequently considers a key problem in policy analysis—the apparent gap between what policy says and how policy is enacted in the day-to-day delivery of service—as a function of street-level distortion, ignoring the role and influence of manager as policy actor. (p.371)

This research also points out that on the contrary to Lipsky's viewpoint, street-level managers do suffer from both internal and external pressure, which influences them to exercise discretion in implementing public policies. This means that frontline managers also work in their self-interest to deal with pressures of implementing public policies.

All in all, the interview findings support the point of Evans (2011) that frontline managers also exhibit street-level bureaucracy behaviors. Therefore, it is not possible to consider frontline managers in the same group as other types of managers. Instead, to understand the phenomenon of street-level bureaucracy, it is necessary to take into account the impact of street-level managers on the implementation process, not just as a manager and not as a policy actor.

There are two reasons underlying this argument. First, frontline managers are managers at the local level. Their decision and power could influence their subordinates. When frontline managers exercise discretion, it is possible that they increase the level of discretion that street-level workers use. Second, frontline managers are also policy actors. However, they are different from the traditional street-level bureaucrats of Lipsky in the

sense that they are frontline officials with the power of decision and responsibility of a manager. Thus, as much as they would exercise discretion to serve their self-interest, they would still be held back by their position. For these reasons, frontline managers have a quite special position in local government as well as the policy process. It would be unjustified to analyze the role of frontline managers as only managers or policy practitioners.

This study also shows that the policy implementation gap in Vietnam could be attributed partly to street-level bureaucracy. The alcohol-related policies are not effective due to the divergence of frontline level from central objectives. Although the difficulties when implementing alcohol control policies in Vietnam could be due to the impractical and complex policies themselves, the street-level bureaucracy phenomenon still offers new insight into the problem.

To sum up, frontline managers do not play one role. They are both managers and policy implementers at the same time. They do not only manage and supervise the implementation process but also take part in the process. This research indicates that frontline managers also tend to exercise discretion to deal with their complex working environment. They are under the influence of various factors. Thus, frontline managers also take a part in creating a gap between policy objectives and actual implementation results. To understand the street-level bureaucracy phenomenon, it is necessary to analyze the role of frontline managers as well. In addition, similar to other countries, Vietnam also experiences the problems with street-level bureaucracy.

6. Conclusion

The final chapter will first highlight the main findings of the research. Next, it will present the implications of this study for management and public policy implementation as well as suggestions for any further research.

6.1. Main Findings

The first purpose of this research is to examine the role of government managers in policy implementation at the frontline level and to answer: How do frontline managers react to policies formulated centrally? Two sub-research questions are formulated to guide this study: 1. How do frontline managers apply central policies in the local context? 2. What are the factors frontline managers perceive to hinder/ support them during the implementation of public policies? The research was conducted using a case study approach with the context of alcohol-related policies in Vietnam.

The research questions are based on the argument that frontline managers, in order to cope with the pressure of their working environment and sustain their interest, also exercise discretion in their work. Frontline managers should not be looked at as another type of management in the organization, who, due to their position and power, would work in line with the interest of the organization. Rather, frontline managers should be considered in their dual role.

The research result supports this argument. It is found out that the frontline managers could choose light penalties for the violators or ignore minor violations of the laws. They could also decide not to apply the policies in some cases. Similar to frontline bureaucrats, frontline managers are also under various influential factors. Some of these factors are in line with other research such as direction from the upper-level (Ricucci et al., 2004; Ewalt & Jennings, 2004), limited resources (Meyers & Vorsanger, 2007; Ugwuanyi & Chukwuemeka, 2013; Heckman, 2015), and the knowledge and attitude of the implementers towards the policies applied (May & Winter, 2009).

One factor emerged from this research is the impact of local people in policy implementation. Local people not only hinder the process by opposing to the changes produced by the policies. They could also exert influence on policy implementers using social power. This finding could be explained partly in terms of social psychology, where members of the same community could affect each other (Nolan et al., 2008). On the other hand, the influence of local people could be attributed to cultural factor, in this case, is the collectivistic culture of Vietnam. In a collectivistic culture, members of a community would protect each other and maintain loyalty with the group (Hofstede, 2001). Thus any strict penalty for noncompliance with the policies is not possible, at least without the guidance and supervision from the upper-level of management and substantial resources.

Since street-level managers do suffer from both internal and external pressure, which influences them to exercise discretion during implementing public policies, it is not possible to consider frontline managers in the same group with other types of managers as Lipsky state in his work. Instead, the impact of street-level managers on the implementation process should be analyzed by studying frontline managers as special individuals. They are special in the sense that they are frontline officials with the power of decision and responsibility of a manager, which is different from the traditional street-level bureaucrats of Lipsky (1980). In their role, the exercise of discretion in frontline managers could lead to or even increase the level of discretion that street-level workers use. However, at the same time, frontline managers would still be constrained by their position and responsibilities as managers of public organizations. The impact of playing a dual role would, therefore, influence the implementation of policies. Frontline managers, instead of being an objective supervisor of the implementation process, actively take part in the process with their discretion, shaping and interpreting the policies for their subordinates. Thus, frontline managers also contribute to the problem of implementation gap.

The second objective of this study is to find out if the street-level bureaucracy phenomenon occurs in Vietnam since there has been scarcely any literature about this issue in Vietnam. The result shows that the alcohol-related policies in Vietnam are not

effective probably due to the divergence of frontline level from central objectives. Although the difficulties when implementing alcohol control policies in Vietnam could be due to the impractical and complex policies themselves, the street-level bureaucracy phenomenon still offers new insight into the problem in the country. Likewise, the policy implementation gap in Vietnam could be attributed partly to street-level bureaucracy. In addition, the fact that culture of Vietnam plays a contributing role to the issue is an interesting finding of the thesis.

This study seems to present a supportive argument for the bottom-up model in implementation literature. The central policymaking model is not comprehensive enough to consider all problems at street level, leading to the gap between objectives on paper and what is in practice. However, as pointed out in the research, the policies are implemented in a much effective manner when there are direction and supervision from the upper-level of management. This implies that depending entirely on the “bottom level” might not be a justified option either. For this reason, the unification of top-down and bottom-up models could offer a more plausible explanation. On the other hand, the impact of clear guidance from the upper management level is not the focus of this research. A reasonable conclusion cannot be drawn here but call for further research.

6.2. Managerial Implications

The finding of this research presents implications for practice in terms of understanding and mediating the role of frontline managers in the policy process. Public management and implementation processes should give recognition to the special role of frontline managers, being managers and practitioners at the same time. This research also points out that upper-level of management should not depend solely on street-level managers to control and supervise street-level staffs.

Frontline managers are exposed to influences from the working environment as well as affected by their self-interest. In all cases, the assumption that managers always work towards the organizational objectives is flawed, at least in the case of frontline managers. Rather than treating them the same as other managers, public management needs to take

into account factors that influence frontline managers. What are their concerns and interests? How do they perceive the policies? How do they apply the policies in real conditions? Various factors, both external and internal, could lead to the divergence of frontline managers from the main policy objectives formulated by the central government.

Moreover, as managers, frontline managers could influence their subordinates. Thus, central management needs to encompass a structure that mitigates the negative behaviors and advance positive responses from not only street-level staffs but also their immediate managers. However, the perceptions and incentives of frontline managers could be different from that of street-level bureaucrats due to their roles. The measures taken by central government should differentiate between two subjects to be effective.

Some factors that upper management could consider to direct the behaviors of street-level officers include budget and human resources and the coordination of their immediate management level. The local context and culture could probably affect the implementation process. Thus, appropriate strategies need to be created with enough attention to these factors. Another aspect upper managers should also take into account is the knowledge and attitudes of street-level bureaucrats towards the policies. It is important since these factors could influence the understanding and willingness to follow the policies of practitioners.

The research results contribute the most to Vietnam. Since previous research about street-level bureaucracy is mostly conducted in Western countries, it is difficult to say if Vietnam has the same problem or not. According to the study results, Vietnam could probably experience street-level bureaucracy issues. To make the policies more effective, it is necessary for Vietnamese government to take into account the importance of those who directly interact with the Vietnamese people – the street-level bureaucrats. Some practical suggestions could be found above.

Another thing for Vietnamese government to reconsider is, perhaps, the current application of top-down decision-making models. The gap between the top and bottom at

present might be too far that the value and objectives of centrally formulated policies could not be translated accurately to the frontline level. Accordingly, the integration of the bottom level in the policy process could help bring more understanding to the issues and enhance compliance from the people.

6.3. Limitations

It is acknowledged that this research still has some limitations. The scope of this research is limited to research at one province and about the implementation of alcohol-related policies in Vietnam. In addition, the small sample size of the research could affect the findings. For these reasons, the results may not be generalized to apply to similar contexts.

Second, the findings of this research are based on the one-sided account of frontline managers. However, the problem with discretion is much broader. The stories told by frontline managers may not be in line with the experience of their subordinates and local people. It would be better if the research was conducted with a larger sample including street-level staffs, home-brewing households, and local wine distributors. They could provide more insight into the overall implementation of alcohol-related policies and how frontline manager's decisions and work influence the way policy is implemented in the local context. By doing so, the issues regarding the use of discretion by frontline managers could be more clearly illustrated.

Besides, due to the nature of discretion, the problem is not approached directly during the interviews. It is sensitive to ask the participants if they comply with or divert from the central policies. Thus, the discretion discussed here are only the signs detected from the stories shared by the participants. It would offer better results and insights into the exercise of discretion by frontline managers if the issues could be brought up in a more straightforward manner.

Finally, in face-to-face interviews and due to the political sensitiveness of the topic, it is possible that the participants' answers are subjected to bias. One type of bias could be social desirability bias, which causes respondents to answer the questions in a socially

acceptable manner in front of the researcher (de Jong, Pieters, & Fox, 2010). In this way, they could alleviate some problems that they face or the consequences of their discretion. In addition, interviewees could answer the questions superficially, thinking they cannot benefit from participating in the research. On the other hand, the participants might fear that their honest answers could cause problems if they admit diverting from the objectives of the central government. Thus they are not open up about their actual implementation work. To overcome these problems, the participants were assured of their anonymity when taking part in the interview from the beginning. Besides, rapport and goodwill were communicated to the participants during the interviews. However, it could not be guaranteed that all participants would open up the same way about the topics.

6.4. Suggestions for Further Research

While the research offers another perspective to look at the discretion issue in street-level bureaucracy, the findings allow for limited generalization. Thus, further studies are necessary to develop a solid understanding of the impact of frontline managers in the policy implementation process.

First, future researchers can conduct a comprehensive examination of the role of frontline managers in the policy process. How is the policy process affected by managers' exercise of discretion in their work? Do the discretion exercised by frontline managers add up to the problem of discretion among street-level staffs? To what extent frontline managers divert from central policies goal? How does the role of managers constrain the extent of divergence?

In addition, since the scope of this research is limited to frontline managers, further research could expand the research sample as discussed in the limitation part. It could help to provide more insight into the discretion issues of frontline managers in specific and the gap between policy implementation and policy goals in general. Future research could also employ a quantitative approach to have a generalized result about this phenomenon.

Another interesting topic is the impact of social relationship on street-level bureaucrats.

Is it possible that street-level bureaucrats divert more from the policies if they know the subjects and to what extent they are willing to make exceptions in this case? Besides, the influence of culture could be taken into account. Further research could analyze the differences in implementation practices between countries to determine if culture and norms could influence the policy process.

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