

Bureaucratic Indecision and Risk Aversion in India

Sneha P¹

Neha Sinha²

Ashwin Varghese³

Avanti Durani⁴

Ayush Patel⁵

Abstract

The Indian bureaucracy suffers from indecision and risk aversion, resulting in an inordinate focus on routine tasks, coordination failures, process overload, poor perception, motivational issues, and a deterioration in the quality of service delivery. We argue that bureaucratic indecision, in large part, is a form of rational self-preservation exercised by bureaucrats from the various legal and extra-legal risks to their person, careers and reputation. These risks originate from problems of organizational design, institutional norms, and other political factors. The research for this paper included a review of interdisciplinary literature on bureaucracy and policy decisions, combined with semi-structured interviews. We interviewed current and ex-bureaucrats from India and other Asian and African countries, political scientists, and other policy researchers. We also conducted a document analysis of historical and contemporary, administrative, and legal documents, including committee reports, acts and rules, annual reports, and other government publications. We summarise the evidence on factors such as penal transfers, overload, inadequate training, process accountability, contradictory rules, and political patronage.

Keywords: Bureaucracy, Decision-making, Risk-aversion, Administrative, Reforms, Norms, Rule-based, Accountability

Publication Date: 19 November 2021

¹ Sneha P is a PhD Candidate at the Berlin School of Economics and formerly, a Senior Associate at IDFC Institute.

² Neha Sinha is Deputy Director & Associate Fellow at IDFC Institute

³ Ashwin Varghese was an intern at IDFC institute and is currently a consultant at BCG.

⁴ Avanti Durani is Assistant Director & Junior Fellow at IDFC Institute.

⁵ Ayush Patel is a former Associate at IDFC Institute.

I Introduction and Motivation

1. Personal Risks and Bureaucratic Indecision

Policies are frequently subject to failure. There may be financial obstacles, implementation delays, or other unintended circumstances. Often, these factors are not within the control of the bureaucrats who take the implementation decisions. Let us refer to these decisions as policy risks, i.e., the risk of failing to deliver the intended public good or service. Such policy failures also have consequences for bureaucrats' reputation, career progression, financial standing, and motivation. These decisions therefore also carry personal risk for the bureaucrat i.e., the risk of being transferred, investigated, or accused of corruption or reputationally maligned. In the Indian context, under various capacity constraints, electoral and policy considerations are frequently at odds with one another, and nearly every policy risk often presents a significant personal risk for bureaucrats. This occurs because they are often individually, rather than institutionally, held accountable for bad policy outcomes. In this situation, bureaucrats exhibit indecision as they avoid personal and policy risk.

Moreover, in recent times, it has been observed that even policy-risk-free decisions present a significant personal risk to bureaucrats. This could be a routine decision that has near zero probability of a negative policy outcome. This occurs when bureaucrats are pulled up for decisions that are unpopular for extraneous reasons. These could be outcomes that are against political preferences or challenge other vested interests. To avoid experiencing these personal losses, bureaucrats either avoid making policy decisions or take decisions that minimise personal loss. This loss aversion strategy manifests itself when bureaucrats perceive losses more strongly than gains (See Kahneman and Tversky 1979). This is often the case with policy decisions related to matters like procurement, infrastructural development, and financial regulation.

A third scenario is one where there is no information about the probability of potential outcomes and the bureaucrats are uncertain about the policy decision. Here too, the fear of personal loss may cause bureaucrats to strategically avoid decision-making and exhibit a bias toward the status quo. This prevents them from learning about potential policy outcomes for future decisions.

Much of this indecision, therefore, is a form of rational self-preservation, exercised by bureaucrats who are otherwise left unprotected by the institutions that they serve. While the literature on governmental corruption, capacity constraints, and failure to reform is relatively rich, the area of indecision is less explored. In this paper, we closely examine the nature of risk aversion in bureaucratic decision-making in India, why it occurs, what are its implications on service delivery, and how it can be ameliorated.

2. Implications on Decision-making and Delivery

The COVID-19 pandemic has brought to the forefront the importance of agility and quick decision-making in governance. Despite the considerable degree of uncertainty and riskⁱⁱ around the novel Coronavirus, governments had to make rapid policy decisions to avert public health crises and ensure uninterrupted delivery of public goods and services. In many contexts, because time was of the essence, indecision had harmful consequences. For example, several national and regional

governments were criticised for delaying airport screening, test kit procurement and, later, the resumption of essential services. Indecision on each of these fronts led to substantial social and economic losses. Therefore, indecision, even in times of limited information, can have severe implications.

First, risk aversion has an impact on the nature of tasks that bureaucrats choose to take up. Bureaucratic fear of loss of control can lead to a singular focus on routine tasks (Diamond, 1985), particularly in generating documentation viz. paper trails justifying their decisions (Hull, 2012 in Heyman, 2012). Bureaucrats select out of certain kinds of tasks, particularly those involving reputational/personal risk. There is a tendency to either deny the existence of the problem, procrastinate over it, pass the file over to another authority, or dismiss the problem as altogether unsolvable.

Second, bureaucrats tend to spread out policy risk by needlessly constituting committees for a decision, passing the decision on to a higher authority, or requesting consultation with multiple departments. The proliferation of ministries over the last decades could also be indicative of this. There are 51 Union Ministries as of 2020, having grown three times from the 17 ministries of newly independent India. Even though this may be a positive indication of decentralisation of power, this proliferation hampers decision-making by introducing delays and other coordination failures.

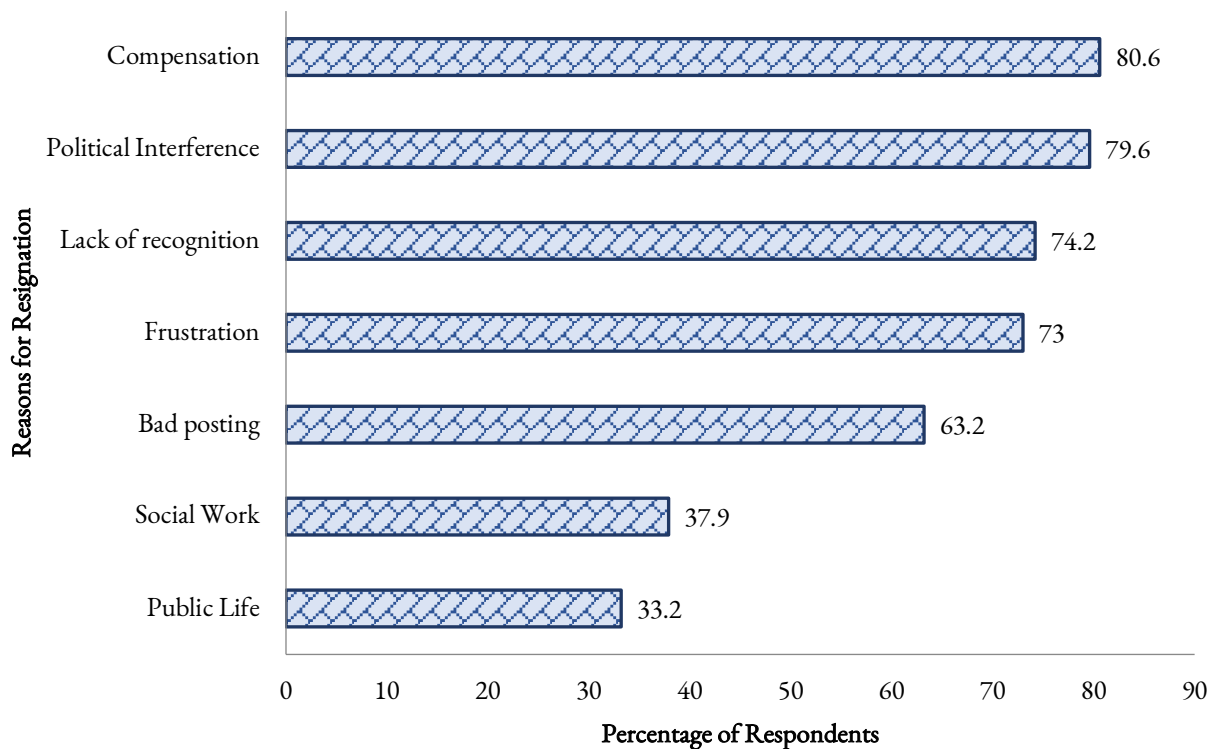
Third, faced with personal or career threats, bureaucrats can either become acquiescent, or are forced to find ways to evade decision making or risk taking. One strategy is to collaborate with other bureaucrats to evade procedures (diversify risk) and another is to rely on non-governmental actors like donors and multilateral agencies to support decisions (transfer risk). When none of these options are viable, bureaucrats find themselves having to resign from the service. In a 2010 survey of civil servants in India, it was found that 33.6% of IAS respondents had considered resigning from the service at least once (DARPG, 2010). Of those who did, 80% mentioned political interference as reason and 73% mentioned frustration (Figure 1).

Fourth, these motivational issues lead to arbitrariness and poor work performance (Gupta, 2012 in Heyman, 2012) which result in project delays, under-utilisation of resources (Choudhry and Mohanty, 2019), inter-stakeholder coordination failures (Ayyangar, 1949), and even shelving of important reforms. Projects that have very specific mandates and targeted actions are more likely to be implemented than those that have broader ambitions and uncertainty in outcomes. An alternative phrasing of this is that bureaucrats work better in mission mode when projects are “temporally concentrated” in that they have fixed timelines (Kapur, 2020), and their outcomes are predictable. In contrast, bureaucratic response to crises or disaster situations, where timelines and outcomes are unclear or uncertain, such as the ongoing pandemic, is often inadequate as bureaucrats are unable to deviate from rules and take necessary risks (Singh, 2020).

Fifth, and most gravely, the quality of public goods and services delivered deteriorates. As mentioned earlier, procurement and payment sanctioning are highly risk-ridden processes for bureaucrats. Risk aversion in these processes directly impacts the quality of public goods and services. For instance, there is a tendency to accept the lowest tenders meeting the minimum specifications (regardless of a bidder’s ability to deliver). This is because price-based procurement decisions are easier to justify later, while quality-based procurement decisions are less straightforward to defend post-transaction. The selection of vendors and subsequent payment is a discretionary process, because

bureaucrats must make decisions with incomplete information or based on approvals of officers at other departments/levels, yet they are held accountable for outcomes and therefore more exposed to the risk of corruption accusations. As a result, bureaucrats pre-emptively rely on price-based processes, which then compromise on the quality of inputs, that in turn reflect the quality of outputs like roads or irrigation.

Figure 1: Reasons for resignation among IAS officers (Base = 900)



Source: Indian Civil Service Survey (DARPG, 2010)

Even after the procurement process, bureaucrats who are fearful of accusations may choose to continually delay payments in the absence of more evidence of quality. On similar lines, bureaucrats are in the habit of opting for a legal dispute with contractors in case of an unforeseen situation during contract delivery (instead of renegotiating terms), buying from the public sector wherever possible, strict adherence to assessing quality in a quantifiable way, constituting committees with a diverse and large membership, and mechanically applying precedent. As Krishnan and Somanathan (2017) put it, this further embeds the culture of “procedure purity over substantive correctness”.

A final latent but important point is how the perception of bureaucrats (consider the connotation of the word bureaucracy) has suffered because of this non-performance. This is also evident in the common representation of bureaucrats in popular media and culture, associating them with inefficiency, red tape, and corruption which in turn reinforces the reputational risks. For instance, a quick analysis of national media finds that “corruption” is the fifth-most associated term with “bureaucracy” in the last two decadesⁱⁱⁱ.

3. Scope and Methodology of the Study

The risks that bureaucrats face, and the ensuing risk-aversion varies across levels of government, verticals of government, and within services. Anecdotally, we learnt that bureaucrats at higher levels of decision-making (secretarial level), bureaucrats in ministries with heavy procurement responsibility (infrastructural ministries), and bureaucrats within services with regulatory responsibilities (for e.g., corporate governance) are more likely to be victims to risk aversion than others. In this paper, we choose to focus on the Indian Administrative Service (IAS) because it is a cadre that staffs officers across these functions.

As we can see in Table 1 below, IAS occupies a significant proportion of secretarial positions, especially at the Joint Secretarial level.

Table 1: Distribution of IAS officers across levels of service in 2012

Civil Service Posting	Secretary Level	Additional Secretary Level
IAS	81	100
IPS	18	10
IFS	3	
Indian Postal Service	1	
Railway Service	1	
Indian Legal Service	3	
Indian Audit and accounts service		1
Indian Defence service		2
Indian Revenue Service		3
Central Secretariat Service		1
Others	6	2
Total	113	119
% IAS	71.7%	84.0%

Source: Krishnan and Somanathan, 2017

IAS officers are also exposed to a considerable number of legal threats. As we have discussed in Section 2.1.1 (below), as many as 625 complaints were filed against IAS officers in 2018. Often, such complaints and charges are not disposed of within the same year, which means that officers are likely to carry these charges over multiple years, regardless of their culpability. As a result, these charges are likely to have adverse reputational outcomes even if not legal ones.

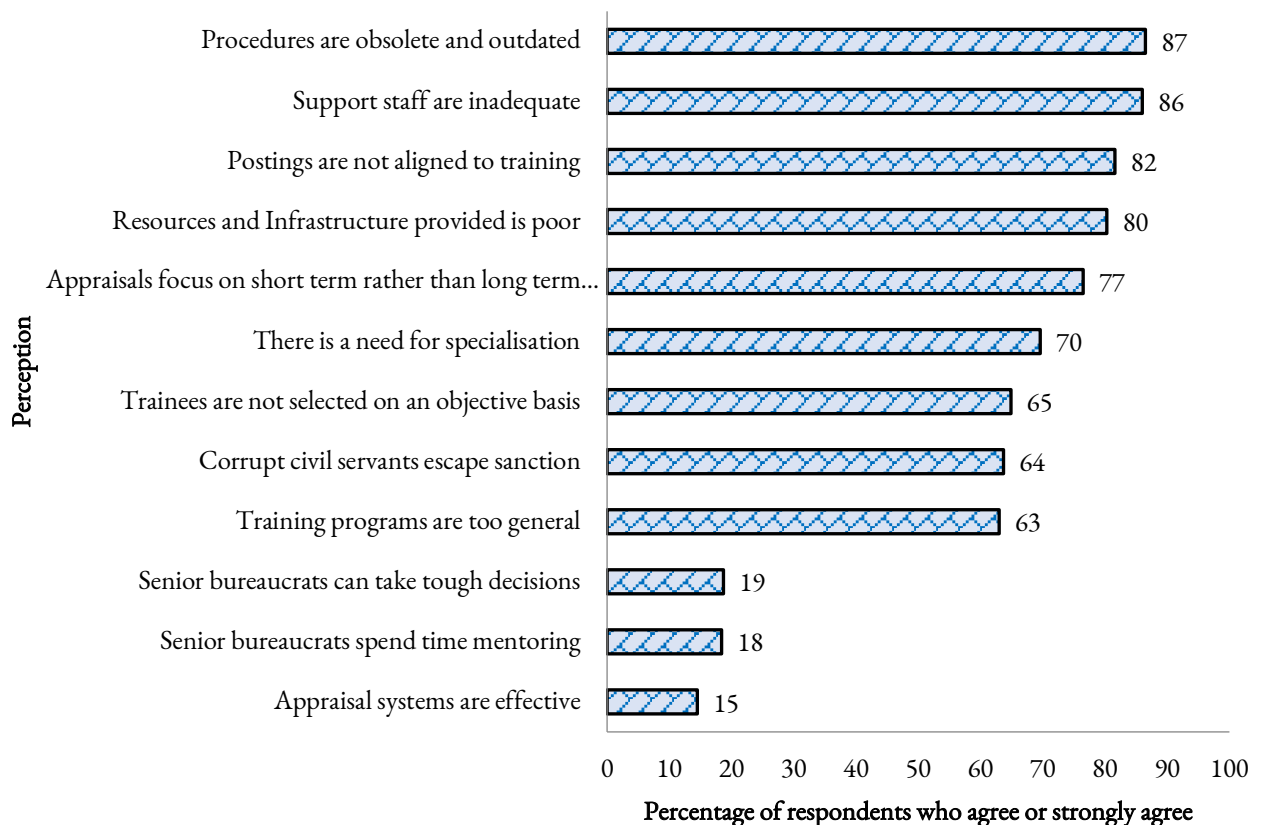
The research for this working paper included a review of interdisciplinary literature on bureaucracy and policy decisions, combined with semi-structured interviews. We interviewed current and ex-bureaucrats from India and other Asian and African countries, political scientists, and other policy researchers. Through the interviews, we were able to understand the various types of bureaucratic risks, behaviour under risk and outcomes of this behaviour.

We also conducted a document analysis of several historical and contemporary administrative and legal documents, including committee reports, acts and rules, annual reports, and other government publications. This documentation helped validate the credibility of the legal and administrative threats that bureaucrats face. Further, we examined personal/reported experiences of bureaucrats' experiences such as blogs, autobiographical books, news reports and other media, to understand individual experiences of succumbing to or overcoming risk aversion.

II The Causes of Bureaucratic Risk Aversion

Despite the considerable decision-making power at senior levels of the service described above, there are several factors that hinder and constrain decision-making. In the following sections, we delve into the organisational design, institutional norms, political interference, and other factors highlighted above that prevent decision-making and induce risk aversion among bureaucrats.

Figure 2: Selected grievances of Indian civil servants (NB: Base differs for each grievance)



Source: Indian Civil Services Survey (DARPG, 2010)

Figure 2 above represents selected grievances of civil servants from the 2010 Civil Service Survey (DARPG, 2010)^{iv}, which describes several issues that we will be covering in the following sections.

1. Organisational Design

Policy discourse has analysed the state as an institution, but discussion of the state as an organisation has been limited (Kapoor, 2020). In this section, we aim to do this by examining the processes and procedures governing recruitment, monitoring, training and performance appraisal, and access to resources. We discuss how organisational design failures lead to indecision and risk aversion.

1.1. Intimidation through over-monitoring

In a democratic framework, bureaucrats are unelected officials, yet wield regulatory power; thus, it is essential to have mechanisms for oversight of their effectiveness and efficiency (Gruber, 1987) (Apaza, 2008). However, sometimes these monitoring mechanisms become tools for exercising control over the bureaucracy, which ultimately undermines their ability to do their job. Misuse of this monitoring system can also lead to adverse consequences for bureaucratic performance by becoming tools of intimidation.

Baseless Investigations

60% of Indian IAS officers feel that their performance was affected by baseless complaints and investigations (DARPG, 2010). Table 2 below summarises the types and number of complaints pending or filed against IAS and other senior officers each year.

In many of these instances, the cases or complaints are eventually dismissed, but the process itself is the punishment: several of these proceedings extend over years, having significant reputational consequences for the accused bureaucrat.

Scrutiny of Deliberations

Monitoring compliance with rules through (neutral) mechanisms such as audits and right to information is an integral part of governance and a key feature in the checks and balances on executive functioning and public service delivery. Despite that, research has shown that such features can become restrictive and conversely, engender opacity (Gerardino et al. 2017). For example, with the introduction of the Right to Information Act, 2005 (RTI Act), an unintended effect has been that the deliberative component of the bureaucratic process has come under scrutiny. While the aim of the RTI Act was and is to foster transparency in governance, its absorption into the bureaucratic work culture has followed a different path. As a result, bureaucrats now stay away from tendering frank advice (Krishnan and Somanathan, 2017).

Table 2: Complaints and Investigations against IAS officers in 2018

2018-19	Number
Complaints Received and Processed (IAS)	625
Disposed	596
Corruption Charges (IAS)	5
Sanctions	4
Ruled out	1
Privilege notices (IAS)	12
Disposed	2
Complaints by MPs (IAS)	6
Disposed	2
Administrative Enquiries Final Orders (Group A)	9
Suspension/Deemed Suspension	2
Prosecution sanctions	1

Source: DOPT Annual Report (Government of India 2019)

Penal Transfers

Other causes of poor performance are disruptive transfers and arbitrary demotions through the ability to upgrade and downgrade posts (Krishnan and Somanathan, 2017). The authors contend that arbitrary transfers have led to short tenures in each post, which has in turn diminished effectiveness. Every incumbent is still on a learning curve in nearly every post when they are being transferred, which prevents specialisation (discussed in detail in Section 2.1.5). Iyer and Mani (2012) present evidence of the use of transfers as political instruments and find that the average probability of transfer for an officer each year is 53% (data from 1980 - 2004).

Frequently-transferred officials may not have adequate formal appraisals, which affects their ability to get empanelled for promotions to senior postings. Looking at the extent to which civil servants are transferred after an election that has resulted in a change in government, India does worse than all parliamentary systems other than Italy, even at the central level (Krishnan and Somanathan 2017). The 2nd Administrative Reforms Committee (ARC) recommended abolishing the system of penal transfers as it is demoralising and acts as a drain on the exchequer.

The threat of transfers and investigations make bureaucrats avoid decisions or take decisions in a risk-averse manner. (Rasul, et al. 2017) find that *over-monitoring* is a cause for delay and failure in bureaucracies. Interestingly, in certain contexts, heightening monitoring and enforcement is also not necessarily successful in addressing corruption as the agents being monitored may simply change their method of corruption (Yang 2005) or displace their corruption to areas that are not monitored (Lichand, Fernandes 2019). For example (Lichand, Fernandes 2019) who study audits on municipal contracts in Brazil, find that vendors who *over-invoice* shift to work with municipalities who are not audited. As they put it, “the focus of the justice system on administrative and criminal penalties to

bureaucrats, rather than on criminal penalties to vendors, and that of public opinion on corruption, instead of on the public service provision, seem to have thrown the baby out with the bathwater.”

1.2. Lack of Autonomy and Discretion

Apart from legal over-monitoring, bureaucrats are often also prone to administrative over-monitoring, in that their decision-making is often subject to approval and authorisation by their superiors. This lack of autonomy not only prevents risk-taking but also disincentivises risk-free decisions. Giving bureaucrats discretion over their own decisions has multiple implications for decision-making. Autonomy increases the speed and efficiency of project completion. For example, evidence from West Africa shows that a one standard deviation increase in bureaucratic autonomy increases project completion rates by 18% in the Nigerian civil service (Rogger and Rasul, 2016) and 28% in the Ghanaian bureaucratic context (Rasul et al., 2018). In Ghana, the authors also investigated corruption, and found little evidence of autonomy having a corrupting effect.

Ineffective Supervision

One mechanism for this increased efficiency is the removal of undue influence or delays by senior monitors. In a study of procurement officers in Punjab, Pakistan, it was found that shifting decision-making power (on audit documentation) from a senior monitor to the implementing procurement officer improves procurement decisions (Bandiera et al. 2020)^v. The authors found that increasing the autonomy of the implementing officer, lowers prices because they are likely to spend more time on procurement unlike the monitors who could delay decision making to the end of the year.

Discretion, Choice and Quality

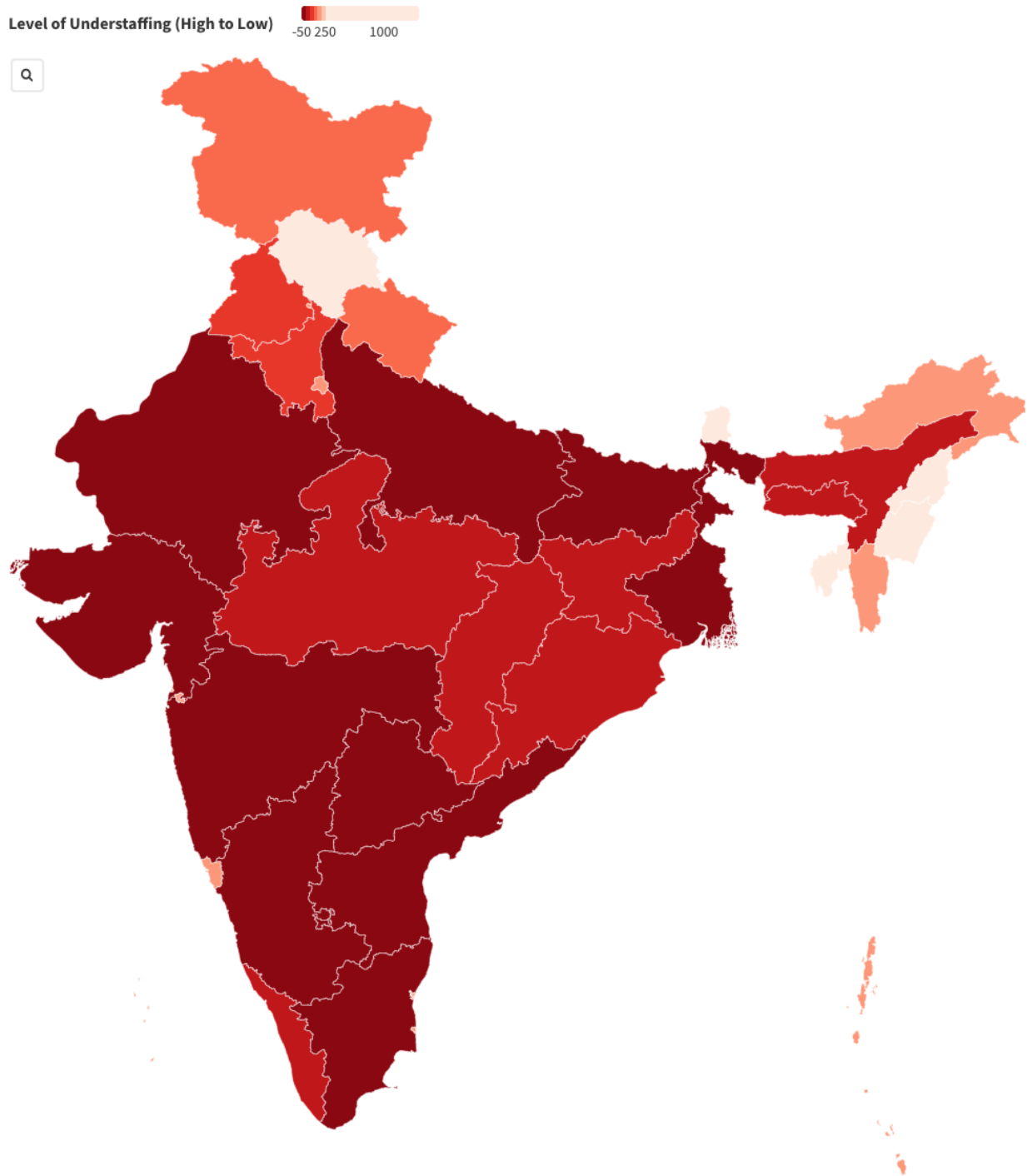
A second mechanism is the increased discretion exercised by bureaucrats to make better choices such as while choosing contractors/suppliers. Studying bureaucratic discretion in procurement decisions in Italy, Coviello et al. (2018) found that even though discretionary procurement decisions led to repeat purchases from past firms (indicative of favouritism), the decisions themselves were associated with lower work duration and administrative costs, and improved quality and quantity of firms. “Discretion may then help, rather than harm, as it allows incomplete contracts to be complemented with dynamic informal governance mechanisms” (Coviello et al., 2018). However, this trade-off between efficiency and leakage is sensitive to the conditions of discretion and auction design. In contrast, in the Hungarian context, discretionary procurement decisions were strategically exercised by bureaucrats who were politically connected and therefore procurement outcomes suffered, and winning firms were less productive and more expensive (Szucs, 2020). Therefore, considerable thought needs to go into the design of autonomy and task assignment and the incentive compatibility of this design. In the Indian context, the lowest cost or L1 procurement is the least discretionary form of procurement as it gives bureaucrats a clear quantitative decision rule for allocating a contract. However, such decisions are then bereft of any subjective or even objective quality considerations important for ultimate service delivery.

1.3. Bureaucratic Overload and Inability to Specialise

Another salient reason for decision paralysis in the Indian bureaucracy is administrative overload and the inability to specialise.

Figure 3 below indicates the level of understaffing in some Indian states.

Figure 3: State IAS Representation against Population



Source: (Krishnan and Somanathan, 2017)

Rate of understaffing is calculated by taking the percentage difference between the state's share of the IAS cadre and the state's share of national population. The excess or shortfall is determined by calculating the difference between the state's cadre as a proportion of total IAS strength and the state's share of population of India (2011), divided by the state's cadre as a proportion of total IAS strength. For example, Uttar Pradesh's share of the population of India in 2011 was 16.49% and the IAS cadre strength in 2012 was 592. Uttar Pradesh's cadre strength as a proportion of total IAS strength was

9.6%. Therefore, the shortfall as a proportion of the expected share was 42%. Conversely, Sikkim's share of the population of India in 2011 was 0.05% and the IAS cadre strength in 2012 was 48. Sikkim's cadre strength as a proportion of total IAS strength was 0.8%. Therefore, the excess as a proportion of the expected share was 1,453%. Similarly, Kerala's share of the population of India in 2011 was 2.76% and the IAS cadre strength in 2012 was 214. Kerala's cadre strength as a proportion of total IAS strength was 3.5%. Therefore, the excess as a proportion of the expected share was 26%.

Sub-optimal Time Use

Dasgupta and Kapur (2017) led a study where block development officers (BDOs)^{vi} were asked to record their time use across the following tasks: filing forms, managing office and staff, planning and budgeting regarding schemes, field visits, handling individual complaints and requests from citizens, local politicians or legislators, unrelated duties, or other. The authors find that these officials are required to multi-task excessively, losing focus on managerial activities, impacting project implementation and related outcomes. The authors find that BDOs can allocate, on average, only 22% of their time on planning and budgeting for programs.

Apart from managerial activities, another set of functions that have a bearing on public service delivery are coordination activities. Kalaj et al. (2020) study time-use among bureaucrats in Ethiopia and find that civil servants that spend more time in coordination activities (meetings and interfacing with clients) work in organisations with significantly better service delivery outcomes.

Lack of Continuity and Specialisation

Closely related to the problem of suboptimal time use is the problem of specialisation and competence. One of the adverse outcomes of frequent transfers is the inability for bureaucrats to specialise (Khosla and Vaishnav, 2016). However, the relationship between specialisation and service delivery, especially by IAS officers, is not straightforward. On one hand, the allure of the IAS is precisely that it is a service for generalists, giving officers access to multiple levels and departments of government. "Make the IAS officer a specialist and he is like anyone else" (Ghate, 1998). The officers are expected to have a certain number of sector-agnostic qualities like leadership, team management, coordination, problem-solving or, as (Agarwal and Somanathan, 2005) put it, [to be] "intelligent and informed generalists".

On the other hand, the reduction of the service into a series of "stints" implies a lack of continuity for the bureaucrat, and thus lack of accountability for service delivery. On-the-job learning opportunities also shrink, and career advancement suffers. Ferguson and Hasan (2013) show that specialisation aids career advancement for bureaucrats in India at all career stages. For early-stage bureaucrats, specialisation serves as a positive signal of ability, while for senior bureaucrats, it aids advancement through the actual ability and skills gained. Specialisation and the development of a focus are important from the perspective of decision-making because expertise provides bureaucrats with the confidence to take risks and manage their consequences.

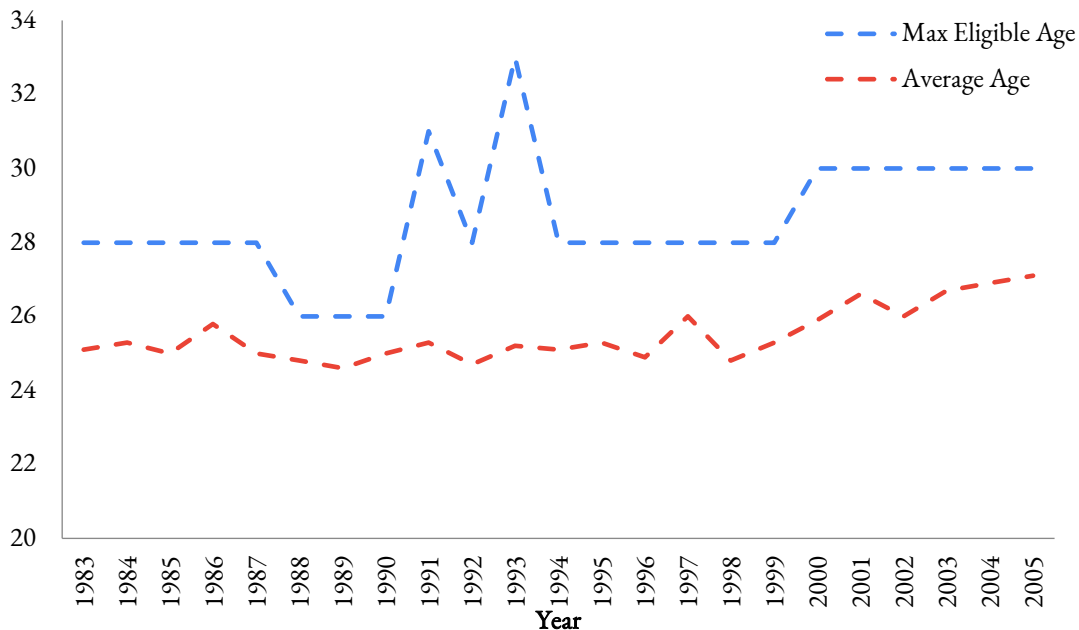
1.4. Candidate Selection and Recruitment

Reforming Selection Criteria

Another factor worth examining in the context of competence for decision-making is the selection and recruitment process of IAS officers. Does the current recruitment process elicit the application of, and subsequently select, candidates with entrepreneurial qualities? At present most discussion about reform to recruitment processes is focussed on quantitative criteria like number of attempts, age limits, selection criteria, and examination design. This is because successful candidates are getting older, are less likely to hold a postgraduate degree, and take an average of four attempts to pass the entrance exam (Vaishnav and Khosla, 2016).

Addressing these challenges, the 10th report of the Second Administrative Reforms Commission (2nd ARC) recommended reduction in maximum permissible age for appearing in the civil service examination (to 25 for general candidates) and the maximum permissible attempts (to three for general candidates) to address the increasing average age of entrants (See Figure 4) and the number of prior attempts.

Figure 4: Maximum Eligible Age and Average General Age of IAS Candidates



Source: ARC, 2008

Personality, Talent and Motivation

While these indicators are reflective of the skill and talent of candidates, the discussion on recruitment reforms often leaves out selection based on qualitative criteria. Candidate personality is particularly important in the realm of improving decision-making and delivery. Are Indian bureaucrats risk averse by selection?

Behavioural research, such as by Hanna and Wang (2017), provides some evidence on how current advertising and positioning of government jobs fail to attract candidates with desirable qualities. They find a correlation between the propensity for dishonesty and preference for government service in India. Interestingly, even after screening for ability, the pool of candidates does not improve on measures of dishonesty.

What motivates candidates to apply to the civil service is also an indicative consideration. Are they motivated by career progression (career oriented) or by social impact (prosocial)? Studying health workers in Zambia, Ashraf et al. (2020) found that when advertising for civil service recruitment, respondents to career-oriented advertisements are likely to be more talented and more effective at each step of service delivery as opposed to prosocial advertisements^{vii}. Therefore, a combination of attracting career-oriented applicants and screening by ability leads to the selection of the most objectively worthy candidates. This finding has been in contrast with previous research which made the case for selecting candidates precisely for their prosocial motivation [health inspectors in Pakistan (Callen et al., 2015) and graduates in Indonesia (Banuri and Keefer, 2013)], indicating that this is a context- and role-specific dynamic, worth investigating further in the Indian administrative context.

1.5. Inadequate Training and Mentorship

IAS officers initially complete a year of training at the Lal Bahadur Shastri National Administrative Academy (LBSNAA), which includes a foundational course and Phase 1 training. This is followed by a year of district-level on-field training, which is then followed by Phase 2 training. From 2007 onwards, a comprehensive system of mid-career training was introduced, whereby officers need to complete 8 weeks of training between their 7th and 9th year, 8 weeks between their 14th and 16th year, and 4 weeks between their 26th and 28th year of service. This training is necessary for promotion to the next level. There is also a plethora of optional training, including options for foreign training. We know from prior research that higher marks on training is a predictor of on-the-job performance (Bertrand et. al, 2015). Data has shown that there are clear performance benefits for IAS officers who invest in training (Khosla and Vaishav, 2016). But how can bureaucrats be trained to become better decision-makers?

Lack of leadership training

A repeated issue with bureaucratic training programmes is that the training focuses on lower-order, typically task-based assignments, and doesn't consider the need for training that gives officers domain expertise or skill development (ARC, 2008). It also does not focus on attitudinal and behavioural skills.

Second, there is inadequate training on developing leadership skills and team-building, which are essential to the functioning of a complex bureaucracy. Low appeal amongst the senior officers and short-term versus long-term trade-offs of such training result in a lot of top officers not undertaking such training (ARC, 2008). In this respect, the Indian bureaucracy can learn a lot from the example of Singapore and Malaysia. In Singapore, bureaucrats receive consistent leadership training and development. They are taught to understand challenges and to break down complex problems into smaller parts. Additionally, there is an entitlement of 100 hours per year of training available to the bureaucrats. In Malaysia, yearly training is a component for performance evaluation and career progression. Other such learnings from international contexts are described in detail in Section 3.1.

Third, bureaucrats are often trained to be policy implementers rather than policy makers. They are experts at execution, even under constrained situations, but not necessarily at big picture ideation and experimentation. This may be another factor leading to risk aversion when making decisions.

Access to Mentorship

As mentioned earlier, a significant grievance (highlighted in DARPG, 2010) has been the lack of mentorship by senior civil servants for junior officers. Mentorship is potentially a channel that can plug gaps in conventional training, and through which bureaucrats can learn about qualitative aspects of the bureaucracy, particularly leadership, team management, problem-solving and risk-taking.

Interestingly, some observers of the civil service believe that it is precisely this lack of contact that isolates district and junior officers from the risk aversion that manifests at higher levels, because of which they can make decisions, delegate, and have trust in the decision-making apparatus. This is another way of saying that current mentorship could propagate a culture of risk-aversion, because of senior bureaucrats' lived experience in dealing with investigations and charges.

1.6. Career Incentives and Performance Pay

As discussed earlier, while intrinsic motivation in the public sector may be higher than in the private sector (Andersen and Seren 2012; Cowley, 2013; Bellé, 2012), the implication of this for bureaucratic decision-making and effectiveness is not straightforward, especially in the absence of career incentives.

Rigid Progression Rules

Promotion in the IAS is tenure-based, occurring at the intervals of 4, 9, 13, 16, 25 and 30 years of service. While at the junior levels, officers usually get promoted soon after they hit these tenure durations; at the senior levels, there is a discrepancy between the sanctioned and actual time, as promotions are often dependent on vacancies and performance reviews (Bertrand et al. 2019). After 16 years of service, officers are also eligible to be posted to the central government, through a process called empanelment, which is considered highly prestigious. However, empanelment isn't a transparent process, and its control often lies in the hands of politicians (Krishnan and Somanathan, 2017).

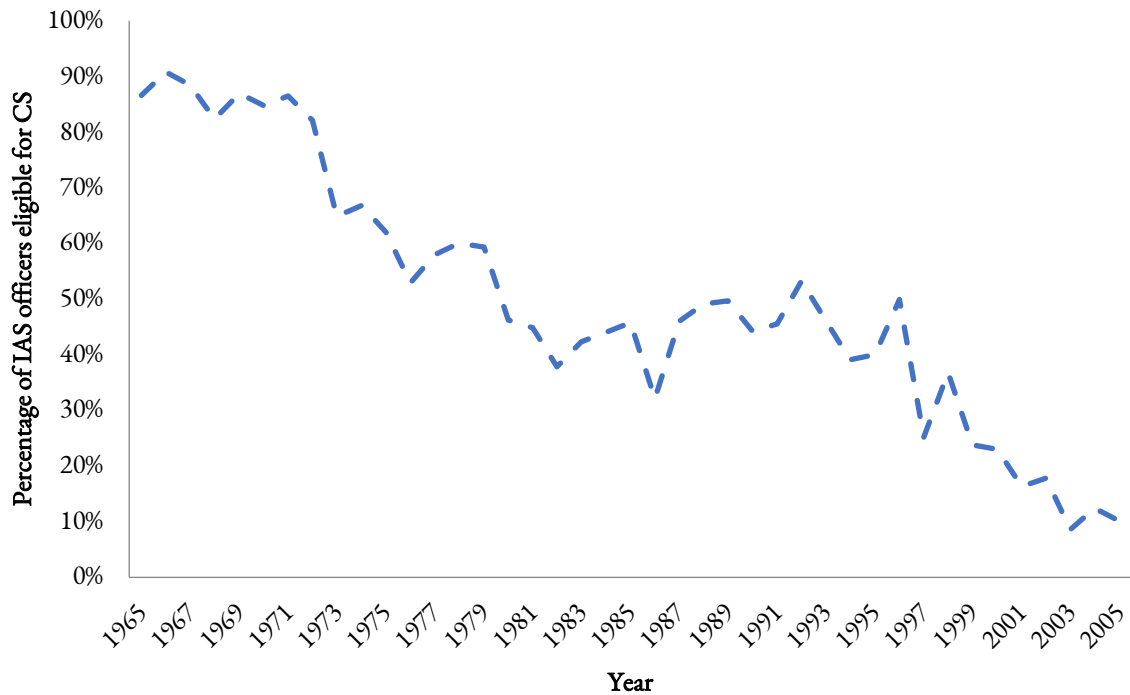
Bertrand et al. (2015) have shown that these fixed progression rules are particularly demotivational to officers who enter the service at an older age. The higher average age of entrants into the IAS has significantly reduced the eligibility of officers to secure higher-level positions as shown in Figure 5 (ARC, 2008). A little over 10% of officers who entered the service in 2005 are eligible to be promoted to the position of chief secretary.

Lack of Career Planning

In addition to career progression rules, the annual performance review process also has many flaws. Officers tend to be judged on adherence to process instead of outcomes, and as a result, do not have a stake in producing good results. Further, the focus of the performance review tends to be on numerical grades and evaluation for past performance, instead of a holistic approach that includes setting goals and career planning (ARC, 2008). It also occurs at a fixed time every year instead of being an ongoing process. The performance review process takes place between an officer and their superior, and there are no departmental goals or alignment between officers in the same department, let alone inter-departmental cooperation.

Because of its ineffectiveness in affecting personal or career growth, officers engage with Annual Performance Appraisal Report (APAR) minimally. Reviews are often filled post the assessment period, and may be done merely to provide a stamp of approval for promotion. Goals are sometimes written retrospectively, i.e. once tasks are completed, bureaucrats often have the power to influence the data on which they are assessed. Further, there is a perception among officers that promotions are secured unfairly. In the 2010 DARPG survey, 78% of respondents believed that some or most officers used influence to gain sought-after positions. Only 24% believed that these postings were merit-based (Khosla and Vaishnav, 2016).

Figure 5: Percentage of IAS officers eligible for chief-secretary



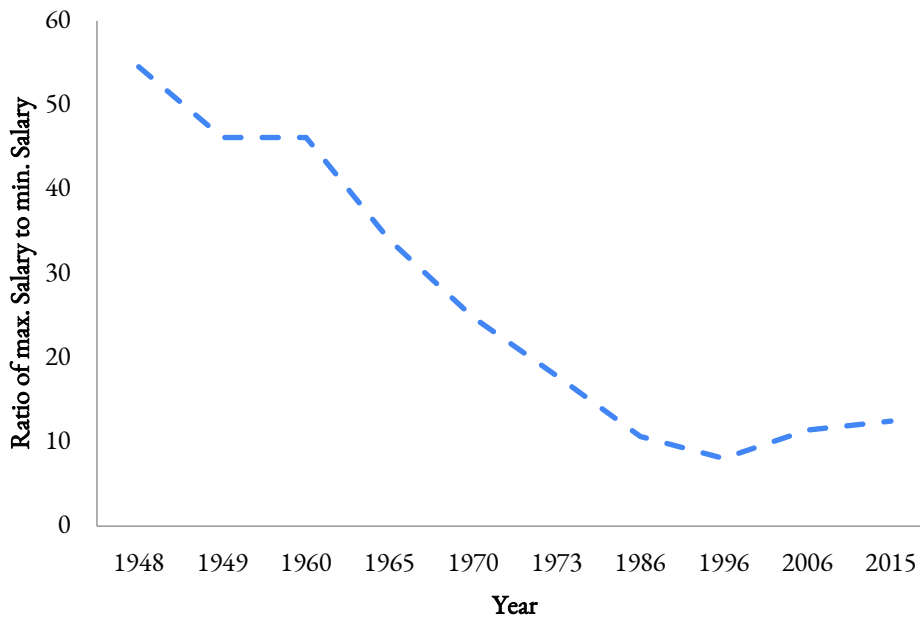
Source: Government of India 2008

Pay Compression

Finally, there is also significant pay compression in government services. Lower-level bureaucrats are overpaid and top-tier ones, including those of the IAS, are significantly underpaid relative to what they could make in the private sector. As shown in Figure 6, the ratio of the maximum wage to the minimum wage has fallen from 54.5 post-independence to 12.50 in 2015. Higher wages attract more able applicants (Dal Bó et al., 2013) and the lack of financial incentives causes self-selection in qualified applicants who would rather work in the private sector. Another issue with low salaries is that it could encourage officers to make money in other ways while in office (Khosla and Vaishnav, 2016).

In conclusion, in the absence of appropriate career and monetary incentives to motivate them, bureaucrats are likely to take a conservative, self-preservational approach to decision-making, and to avoid risks.

Figure 6: Pay compression - Ratio of max. Salary to min. Salary over time



Source: ARC 2008

2. Institutional Norms and Culture

The Indian bureaucracy has a 150-year-old colonial legacy, and the institutional norms and culture that have evolved from this legacy play a significant role in current risk-aversion. This is because bureaucratic norms tend to guide how state capacity develops (Mangla 2015) and what is documented as “official” can have a significant impact on culture (Dery 1996). Routine behaviour leads to the desire for maintaining the status quo, reinforcing isolationist tendencies and defensive attitudes (Diamond 1985).

2.1. Complex rules and Administrative Inefficiency

Remote control administration

The pre-colonial Indian Civil Service (ICS) was a heavily centralised institution, designed for a small group of officers to control a vast country of over 300 million people (Merchant, 2012). This applied not only to the organisational structure but also to decision-making. Officers made decisions based on adherence to rules rather than outcomes. This legacy of centralised decision making and rule-based administration from a distance had a deleterious effect on the risk-taking ability of officers. Rule-based administration reduces, or even eliminates, all discretionary powers of the officer. As a result, decision-making suffers, and many proposals are lost or rejected without adequate consideration.

Contradictory Rules

In an ideal world all these laws, rules, and guidelines would be well-defined, in congruence with one another, and would have clearly outlined incentives/disincentives. In the context of the Indian

bureaucracy, this is often not the case. Bureaucrats face difficulty in taking prompt and appropriate action as there are laws that contradict each other, and in some cases, there are laws formed in such a manner that the incentives or deterrents are either too low or too high. This produces administrative inefficiency in the form of delays, coordination failures, or simple avoidance.

Consider the following excerpt from the RTI Act:

“An Act to provide for setting out the practical regime of right to information for citizens to secure access to information under control of public authority in order to promote transparency and accountability in the working of any public authority, ...”

— Right To Information Act, 2005

Given that the RTI Act was enacted to provide citizens with access to information in the control of any public authority, consider the following features of certain other Acts that contradict the spirit of the RTI Act and hinder its implementation:

- The Official Secrets Act, 1923 does not define ‘secret’ and makes it an offence for public officials to communicate any information to an unauthorised person. Since what is secret is not defined, this becomes a catch-all phrase to restrict the flow of information.
- Sections 123 and 124 of the Indian Evidence Act, 1872 restrict a government servant from citing evidence from unpublished documents without the permission of the head of the department. They are not allowed to disclose any information that may cause harm to the public interest.
- Paragraphs 116 and 118 of the Manual of Office Procedures prohibit officials from communicating information in any form to anybody without a general or specific order.
- There are also state-specific laws that restrict public servants from revealing official documents or parts of it to any person.

These features of multiple laws on the same subject create confusion in implementation, ambiguity, and needless litigation regardless of implied repeal (ARC, 2008).

2.2. Accountability to Process rather than Outcomes

Paperwork forms an essential part of the daily work within bureaucracy. It renders the state legible (Scott, 1998) and functions as a regulatory instrument (Hull, 2003). It also helps legitimise the idea of ‘the state’ as it materialises and gains power through forms, documents and signatures (Scott, 1998). Hull (2003) notes that files, in particular, are instrumental in forming a “ritual construction of collective bureaucratic authority and agents [which] protects individuals and allows particular projects to be collectivised.” Building on the extensive usage of written procedures of the Mughal empire, the British administration, which was deeply distrustful of the native Indian functionaries, created a “surveillance and control” regime using papers, files, and procedures (Hull, 2003). The paper-trail-based method of administration remains entrenched in the organisational norms of the Indian bureaucracy. While there has been a shift from being a colonial state with the primary functions of taxation and public order to a welfare state, procedurally the bureaucracy has not been wholly recast. As Ehmke (2012) notes, the post-independence federal structure of India, with a strong

centre, is partly a legacy of the late colonial Government of India Act of 1935. The administrative structure of the post-independence IAS also bears a large colonial legacy from the British colonial ICS; “[t]he ICS maintained law and order in the British ruled territories of India and served as its ‘steel frame’... Its successor, IAS, was not readily equipped and devoted to the tasks of socio-economic planning and development required by the new government. This meant that a key institution for the implementation of any change perpetuated ideas of the old regime.” (Ehmke, 2012). As a result, the federal organisation of India and the IAS continue to carry colonial legacies.

Accounting-based Accountability

The clamour to keep the bureaucrats accountable to citizens, with a view to ‘discipline’ the unruly, has further hampered the organisation’s culture. The task of fixing accountability has led to top-down, rule-based, process-driven accounting systems, leading to “accounting-based accountability”^{viii} (Honig and Pritchett, 2019). Invariably, this has had a far-reaching impact on discretion, with a tendency to put the process front and centre, ahead of outcomes. It has proved to be detrimental to bureaucratic decision-making, becoming a roadblock to the ‘compliant’ rather than penalising the ‘non-compliant’. Bureaucrats across levels of responsibility describe themselves as “cogs” in the machine, responding to orders rather than citizen needs, breeding a culture of “order followers” rather than “active agents of change” (Aiyar et al., 2015; Aiyar et al., 2020).

In discussing the limits to accounting-based accountability in education (and far beyond), Honig and Pritchett (2019) highlight its pernicious effect on welfare. They caution against managing civil servants primarily or exclusively via “accounting-based accountability” as it could “demotivate those in the system and spur departure of the differentially positively motivated”. The authors go on to say that “accounting-based accountability can be a kind of self-fulfilling prophecy, creating the problem it is meant to solve”.

Apart from breeding deep-seated distrust in the system, it fosters “legalistic” norms, rather than a more conducive “deliberative” approach to decision-making within the bureaucracy. “Legalism” promotes rule-following and deference to a hierarchy, often at the cost of public service delivery, while a “deliberative” model of bureaucracy encourages outcome orientation (Mangala, 2015). Since norms are unwritten codes of conduct, any push to reform the bureaucracy and the state needs to alter the norms and organisational culture from within (Aiyar, 2018).

In Box 1 below, we summarise all the central rules and regulations and some state laws that govern the IAS, revealing the extent of micromanagement of the service and loss of discretion.

Box 1: List of rules/regulations that govern IAS (non-exhaustive)

Central Acts, Rules and Regulations

1. Indian Evidence Act, Section 123 and 124, 1872
2. Official Secrets Act, 1923
3. Delhi Special Police Establishment Act, 1946
4. Constitution of India, 1950
5. All India Service Act, 1951
6. All India Services (Compensatory Allowance) Rules, 1954
7. All India Services (Medical Attendance) Rules, 1954
8. All India Services (Travelling Allowance) Rules, 1954
9. IAS (Recruitment) Rules, 1954
10. Indian Administrative Service (Cadre) Rules, 1954
11. Indian Administrative Service (Pay) Rules, 1954
12. Indian Administrative Service (Probation) Rules, 1954
13. Indian Administrative Service (Recruitment) Rules, 1954
14. All India Services (Leave) Rules, 1955
15. All India Services (Provident Fund) Rules, 1955
16. Indian Administrative Service (Recruitment by Competitive Examination) Regulation, 1955
17. Indian Administrative Service (Appointment by Promotion) Regulations, 1955
18. Indian Administrative Service (Probationer Final Exam.) Regulations, 1955
19. All India Services (Special Disability Leave) Regulations, 1957
20. All India Services (Death-Cum-Retirement Benefits) Rules, 1958
21. All India Services (Remittances into and Payments from PF and family pension Funds) Rules, 1958
22. All India Services (Commutation of Pension) Regulations, 1959
23. All India Services (Conditions of Service-Residuary Matters) Rules, 1960
24. All India Services (Study Leave) Regulations, 1960
25. Indian Administrative Service (Fixation of Cadre Strength) Regulations, 1966
26. All India Services (Conduct) Rules, 1968
27. All India Services (Discipline and Appeal) Rules, 1969
28. All India Services (Confidential Roll) Rules, 1970
29. All India Services (Dearness Allowance) Rules, 1972
30. All India Services (Joint Cadre) Rules, 1972
31. Departmental Inquiries (Enforcement of Attendance of witnesses and Production of Documents) Act, 1972
32. Former Secretary of State Service Officers (Conditions of Service) Act, 1972
33. All India Services (Leave Travel Concession) Rules, 1975
34. All India Services Indemnity Act, 1975
35. All India Services (House Rent Allowance) Rules, 1977
36. All India Services (House Building Advanced) Rules, 1978
37. All India Services (Group Insurance) Rules, 1981
38. Administrative Tribunals Act, 1985
39. Indian Administrative Service (Regulation of Seniority Rules), 1987
40. Prevention of Corruption Act, 1988
41. Compilation of Fundamental Rules and Supplementary Rules (Part-I), 1989
42. Revised Scheme for Redeployment of Surplus Staff, 1989
43. Indian Administrative Service (Appointment by Selection) Regulations, 1997
44. All India Services (Prevention of Sexual Harassment) Regulations, 1998
45. IAS Promotion Guidelines, 2000
46. Compendium of Welfare Programs Instruction, 2001
47. Central Vigilance Commission Act, 2003
48. Central Vigilance Commission Amendment Act, 2004
49. General Financial Rules, 2005
50. Right to Information Act, 2005
51. AIS (Performance Appraisal Report) Rules, 2007
52. All India Services (Performance Appraisal Report) Rules, 2007
53. Central Vigilance Commission (Staff) Rules, 2007
54. Draft Public Services Bill, 2007
55. IAS (PAY) Rules, 2007
56. Administrative Instructions on Departmental Canteens in Government Officers, 2008
57. IAS (Pay) 2nd Amendment Rules, 2008
58. Civil Services Performance Standards and Accountability Bill, 2010
59. Public Interest Disclosure and Protection to Persons Making Disclosure Bill, 2010
60. Citizen's Charter and Grievance Redressal Bill 2011, 2011
61. Right to Public Service Act, 2011
62. Right to Information Rules, 2012
63. Lokpal and Lokayuktas Act, 2013
64. Delhi Special Police Establishment (Amendment) Act, 2014
65. Whistleblowers Protection Act, 2014
66. Manual of Office Procedure, 2015
67. Central Vigilance Commission (Staff) Amendment Rules, 2017
68. Lokpal (Complaint) Rules, 2020
69. Extracts of provisions in F.R. 56, n.d.
70. Fundamental Rules (FR 11 and FR 52, 53 and 54), n.d.
71. Public Servants Inquiries Act, n.d.

State level Acts, Rules and Regulations

1. Bihar Reorganization Act, 2000
2. Madhya Pradesh Reorganization Act, 2000
3. Uttar Pradesh Reorganization Act, 2000
4. Maharashtra Government Servants Regulations of Transfers and Prevention of Delay in Discharge of Official Duties Act, 2005
5. Madhya Pradesh Lok Sewaon Ke Pradan Ki Guarantee Adhiniyam, 2010
6. Bihar Lok sewaon ka adhikar Adhiniyam, 2011
7. Chhattisgarh Lok Seva Guarantee Bill, 2011
8. Delhi (Right of Citizen to Time Bound Delivery of Services) Act, 2011
9. Himachal Pradesh Public Services Guarantee Act, 2011
10. Jammu and Kashmir Public Services Guarantee Act, 2011
11. Janhit Guarantee Act, 2011
12. Karnataka (Right Of Citizens to Time Bound Delivery Of Services) Bill, 2011
13. Rajasthan Public Service Guarantee Act, 2011
14. Right to Service Act, 2011
15. Uttarakhand Right to Service Act, 2011
16. Assam Right to Public Services Act, 2012
17. Kerala State Right to Service Act, 2012
18. Odisha Right to Public Services Act, 2012
19. Goa (Right to Time-Bound Delivery of Public Services) Act, 2013
20. Gujarat (Right of Citizens to Public Services) Bill, 2013
21. West Bengal Right to Public Services Bill, 2013
22. Haryana Right to Service Act, 2014
23. Maharashtra Right to Public Services Ordinance, 2015

2.3. Coordination Failures

Lack of Team-orientation

A hierarchical and pyramidal structure with multiple levels, both salient features of a Weberian bureaucracy, characterise the Indian state well. Several countries have attempted to ‘flatten the structure’, as well as infuse team orientation and organisational goals, to break silos and respond to complex needs of governance (2nd ARC, 2008). The thirteenth report of the 2nd ARC noted that the multiple levels within government, along with division of task into separate units, has led to the creation of silos within each department and emphasised the need for interdisciplinary work teams for dealing with cross-cutting issues.

The role of intrinsic motivation, team composition, distribution of bureaucracy (across different functional lines and tiers of local, state, and federal government), and coordination, both horizontally and vertically, play a critical role in the organisational design and effectiveness of the bureaucracy (Kapur, 2020). The culture and practices within bureaucracy need to be reoriented towards collaboration to achieve the common organisational target.

Intra-governmental coordination

Given the complexity of public administration, the ability to coordinate different functions is key to achieving goals. Ethnographic studies suggest that “fragmentation and arbitrariness in bureaucratic work” create incoherence within the government, and lead to poor service delivery despite genuine commitment (Heyman, 2012). The fragmented structure translates into coordination failures within and between departments. Therefore, an important piece of successful policy and decision-making lies in organisational design, enabled by integration and coordination between departments and units within them. Such integration and coordination need to be vertical as well as horizontal in nature. A network between civil servants which enables interactions and a common understanding of the problems and desired outcomes is key to better coordination (Peter, 2018).

2.4. Corruption and Reputational Risks

Theoretical work has long established that the structure of government institutions is a very important determinant of the level of corruption (Shleifer, Vishny 1993). The incentive structure for bureaucrats needs to be carefully designed to prevent malfeasance, especially when corruption detection capability is limited (Becker and Stigler 1974).

Corruption Perceptions

In 2019, India ranked 80 out of 180 countries^x in the Corruption Perception Index published by Transparency International. Moreover, 69% respondents in 2017 said that they paid a bribe when accessing public service in the last 12 months, as part of the Global Corruption Barometer report^x.

Corruption is symptomatic of poor management, as illustrated by bureaucrats using public institutions for “personal enrichment and the provision of benefits to the corrupt” which can

contribute to “undermin[ing] the legitimacy and effectiveness of government” (Rose-Ackerman et al., 2016).

Experts posit several reasons for this increase in corrupt practices in the higher levels of bureaucracy. Krishnan and Somanathan (2017) suggest that a concerted effort at pay compression between the highest and lowest ranks, together with rising private sector salaries, led to a decrease in morale and an increase in corruption. Other mechanisms of bureaucratic corruption include conferment of special rewards beyond the normal conditions of service, such as through extensions of service and post-retirement employment opportunities in regulatory or quasi-government bodies. The creation or filling up of such posts are timed with the retirement of senior officers, which allows extraction of pensions as well as the drawing of new salaries (Krishnan and Somanathan, 2017).

Anti-corruption Policy

Alongside these developments came the introduction of anti-corruption legislation, including the Prevention of Corruption Act, 1988, the Central Vigilance Commission Act, 2003, the Lokpal and Lokayukta Act, 2013, and the WhistleBlowers Protection Act, 2014. However, rather than reducing corruption, they have had the effect of displacing corruption by bringing in certain adaptive behaviours in bureaucratic decision-making. They have reduced the willingness of officers to offer clear policy advice on potentially controversial issues; instead, officers take the safer route of holding up matters templatising decision-making to minimise the risk of prosecution, and forming committees (Krishnan and Somanathan, 2017).

For example, the Prevention of Corruption Act (PCA) 1988, Section 13(1)(d)(iii), states that “a public servant is said to commit the offence of criminal misconduct if he, while holding office as a public servant, obtains for any person any valuable thing or pecuniary advantage without any public interest.” The absence of ‘intent’, ‘negligence’, ‘recklessness’ or ‘prior knowledge’ in establishing guilt under this section has created an environment which suppresses decision-making. As Leaver (2009) puts it, the avoidance of criticism prompts even public-spirited bureaucrats to behave inefficiently.

In a welcome move, the passage of Prevention of Corruption (Amendment) Act, 2018 redefined provisions related to public servants. It made “bribery” a direct offence and introduced “intentional enrichment” in Section 13, whereas in the earlier version, intent was not included in the definition of criminal misconduct by public servants. There is also now a provision of prior permission for investigating serving and retired bureaucrats.

Paper Trail Paralysis

The fact that a decision could unintentionally, unknowingly, or tangentially cause private gains to some party, even if there is no loss to the government, has created an environment of decision paralysis. Central to bureaucrats’ self-preservation strategy is the ability to manage files, papers, and procedures. The paper trail becomes overwhelmingly important to preserving an untarnished reputation.

There is undue reliance on investigating the paper trail instead of following the money trail for prosecuting ‘criminal conspiracy’ by a public servant. An unintended consequence of this line of action is that innocent and honest bureaucrats could be prosecuted, tarnishing their reputation, and destroying careers, even as the corrupt continue to conceal the act of bribery. The practical effect of

this tendency to “investigate by file reading” has led bureaucrats to feel that it is beneficial to “initially oppose on file any request from the private sector, or indeed a private citizen, even if genuine” to manage the risk of prosecution (Krishnan and Somanathan, 2017).

2.5. Political Alignment and Interference

A common view of the politician-bureaucrat relationship sees the politician determining policies and the bureaucrat implementing them. This view, while simplistic and stylised, conveys a broad sense of the roles these actors play. Typically, it is the case that large policy reform requires political will. Furthermore, it is also true that politicians do not usually involve themselves in the nitty-gritty of policy implementation. However, the nature of the politician-bureaucrat relation is complex. There is now a new set of studies in political economy that helps us understand how this plays out.

There is evidence to suggest that bureaucrats work more efficiently when they work with politicians who (i) are aligned with the party in power, (ii) command a large vote-base, and (iii) are the sole representative liaising with the bureaucrat.

Electoral Support

For example, BDOs have more resources at their disposal when they work in constituencies whose politicians are aligned with the party in power at the centre (Dasgupta and Kapur, 2017). Moreover, Nath (2018) argues that bureaucrats respond better to politicians who are elected with large vote margins. The paper matches politicians to bureaucrats from across India. As an outcome, the paper focuses on time taken by the bureaucrat to approve projects under the Member of Parliament Local Area Development scheme (MPLADS). The main finding is that bureaucrats working under politicians who have larger vote margins—i.e., when the constituency is a politician’s stronghold—take 11% less time to approve projects.

Clear Reporting Channel

Bureaucrats work more efficiently when they are directly under the control of a single politician (Gulzar and Pasquale, 2017). As noted by Kajal, et al., (2012) “multiple principals necessitate more coordination, potentially at the expense of other productive activities.” They find that public officials “operating under multiple principals spend significantly more time in meetings and traveling, and less time interacting with clients” (Kajal, et al., 2012). For example, at the state-level in India, in many instances, a single bureaucrat (say, the District Collector) is answerable to multiple politicians (say, Members of the Legislative Assembly). This is partly due to the uneven overlap of political (electoral constituencies) and bureaucratic (administrative boundaries) jurisdictions in India (Gulzar and Pasquale, 2017).

There are at least three reasons why this could be problematic: first, politicians may not be able to claim full credit for the bureaucrat’s performance, and this could weaken their incentives to monitor performance; second, some politicians may choose to free-ride on other politicians responsible for motivating the bureaucrat, consequently decreasing political oversight over the bureaucrat; third, politicians may jostle for control, which could have negative effects on development outcomes. Gulzar and Pasquale (2017) argue that when it comes to implementation of the National Rural Employment

Guarantee Act, 2005, the credit-claiming story may be the most likely cause for single politicians’ superiority over multiple politicians.

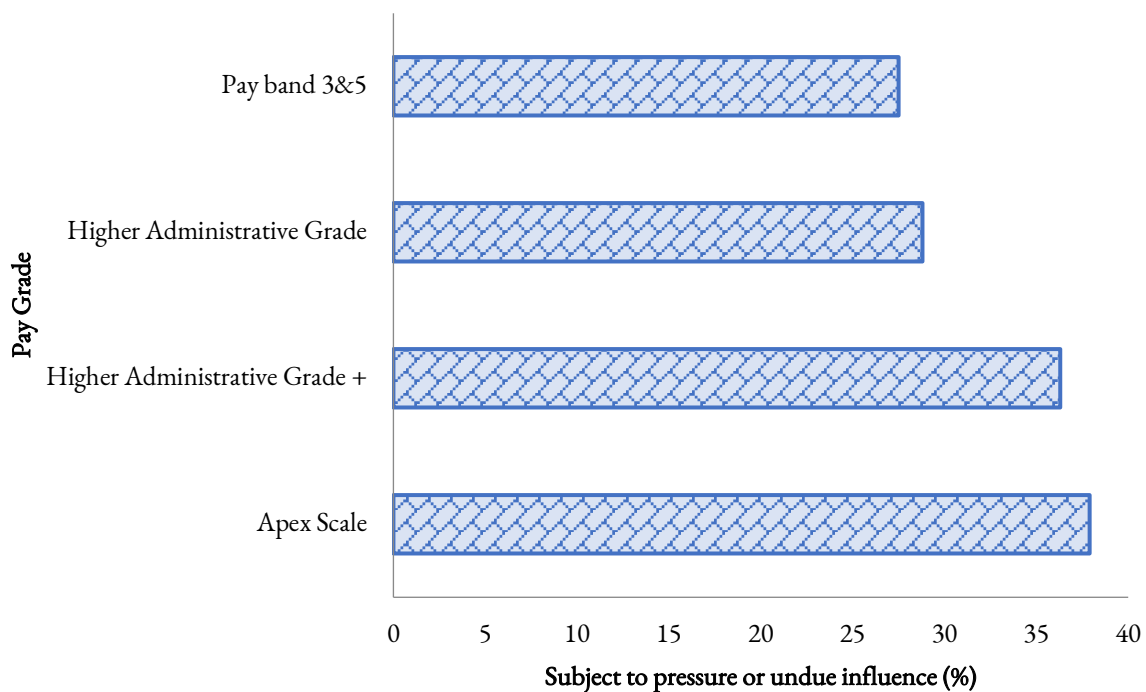
While bureaucratic decision-making benefits from political will or support, it suffers greatly under political interference. Lack of independence and political interference makes bureaucrats subservient to the political class, to whom they pass on their decision-making to avoid reputational and career risks.

Political Punishments

The incidence of this interference with bureaucrats’ careers is evident in the pattern of bureaucratic transfers which are known to rise when new politicians are appointed (Mani and Iyer, 2012). The authors exemplify this with the state of Tamil Nadu, where the spike in transfers corresponds clearly to the change in chief minister. Khemani (2007) has also shown that discretionary transfers executed by the Planning Commission were often distributed to favour states that were politically important for the central power. Transfers are therefore a well established mechanism to trade and assert political power.

The literature on this subject points to two factors that further exacerbate this dynamic. First, it appears that bureaucrats at senior levels are more likely to experience political interference and loss of decision-making power, as can be seen in Figure 7 below (where Apex Scale is one of the highest grades in the civil service, typically signifying a position such as a Chief Secretary of a State).

Figure 7: Perception of civil servants on undue external influence (Base = 4517)



Source: Indian Civil Servants Survey (DARPG, 2010)

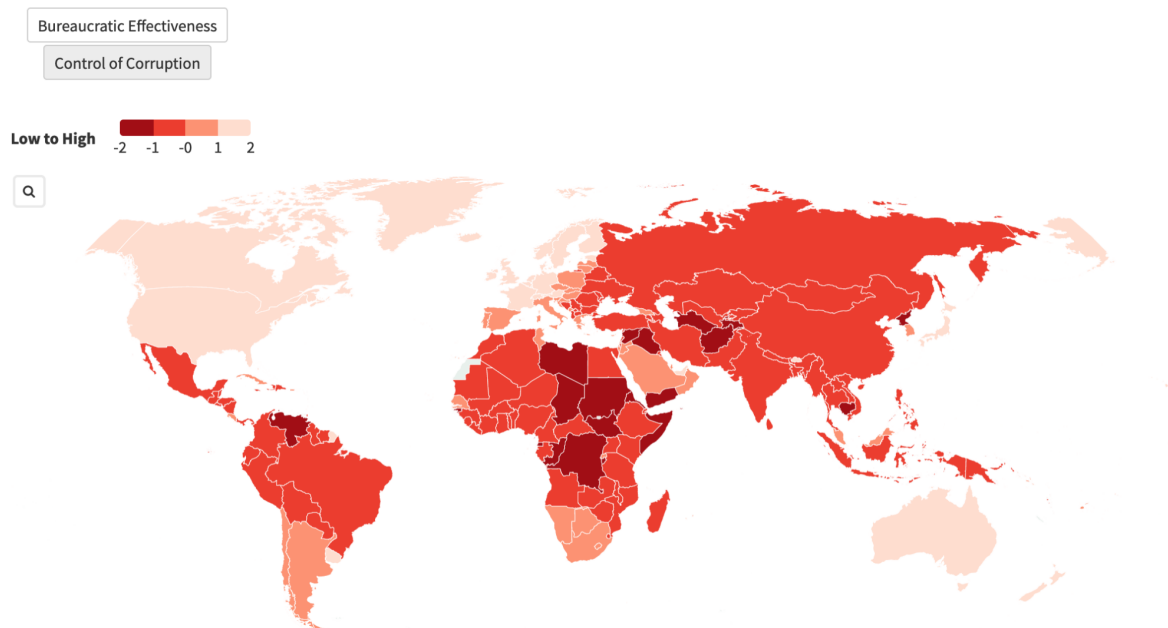
Second, it has been argued that bureaucrats that are assigned to their home states are perceived to be more corrupt and less able to withstand political pressure (Xu, Bertrand, and Burgess, 2020). The

IAS cadre allocations rules require that only one-third of any given cadre may comprise officers serving in their home state (Khosla and Vaishnav, 2016). In both cases, we can see that organisational and social proximity to political decision-makers translates to higher political pressure or influence.

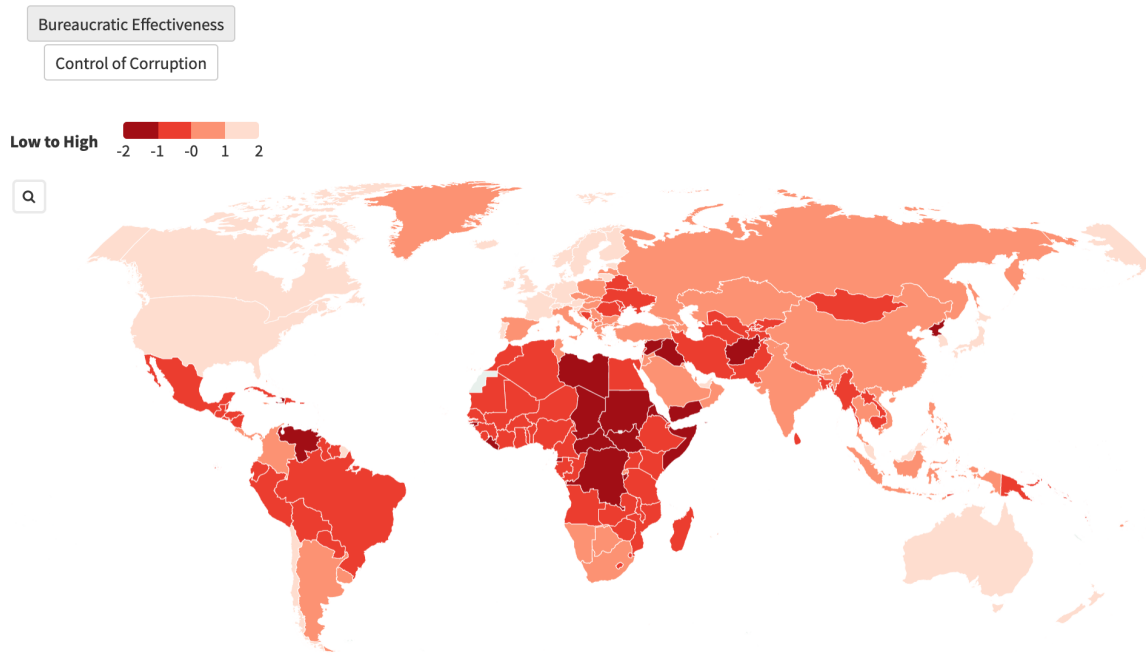
The impact of this interference and exposure to political corruption takes multiple forms. First, “endemic political interference can lead to rent-seeking behavior even for honest officers” (Khosla and Vaishnav, 2016). This takes place through activities like garnering favors, directing decisions toward self-benefit. As you can see in Figure 8 below, bureaucratic effectiveness closely relates to control over corruption, and countries which exercise high control of corruption are also the same countries that show most bureaucratic effectiveness. India ranks 106/214 on corruption control and 76/214 on bureaucratic effectiveness.

Interestingly, there is also early evidence that better financial incentives, especially through higher public sector wages, are not associated with lower corruption, indicating that deeper administrative reforms are required (Jakiela 2018)

Figure 8: Global Mapping of Corruption Control and Bureaucratic Effectiveness



Source: World Bank



Source: World Bank

Source: World Bank, 2018

III Conclusion

In this paper, we discuss the various reasons for bureaucratic indecision, uncertainty, and risk-aversion. This includes flaws in organizational design, restrictive institutional norms, and political misalignment. While this paper focuses on IAS officers, much of its learnings are applicable to state, district, and block-level administrations as well. Local administrators have even less access to resources and training compared to IAS officers and are, under certain circumstances, less empowered to take autonomous decisions and more exposed to personal risks.

REFERENCES

- Ashraf, Nawa and Bandiera, Oriana (2018), “Social incentives in organizations”. *Annual Review of Economics*.
- Administrative Reforms Commission, Government of India (2008). “Second Administrative Reforms Commission: Refurbishing of Personnel Administration: Scaling New Heights” 10th Report. *Department of Public Grievances and Redressal*.
https://darpg.gov.in/sites/default/files/personnel_administration10.pdf
- Administrative Reforms Commission, Government of India (Multiple). “Second Administrative Reforms Commission. <https://darpg.gov.in/arc-reports>
- Agarwal O. P. and Somanathan T.V. (2005) Public Policy Making in India: Issues and Remedies. Working Paper. *Centre for Policy Research*.
- Aiyar, Yamini and Krishnamurthy, Mekhala (2020) “Lateral entry, biometric attendance won’t fix Modi’s bureaucracy issue. Reinvest in the state”, *The Print*, <https://theprint.in/opinion/lateral-entry-biometric-attendance-wont-fix-modi-bureaucracy-issue/372836/>
- Aiyar, Yamini, (2020) “Look beyond rules to reform the bureaucracy”, *Hindustan Times*, <https://www.hindustantimes.com/opinion/look-beyond-rules-to-reform-the-bureaucracy/story-9UNqqyJR8MNNJjEV00035O.html>
- Aiyar, Yamini; Dongre, Ambrish and Davis, Vincy (2015), “Education Reforms, Bureaucracy and the Puzzles of Implementation: A case study from Bihar”, *International Growth Centre*, Working Paper
- Andersen, Lotte Bogh, and Seren Serritzlew (2012). Does Public Service Motivation Affect the Behavior of Professionals? *International Journal of Public Administration* 35(1): 19-29.
<https://www.tandfonline.com/doi/pdf/10.1080/01900692.2011.635277?needAccess=true>.
- Apaza, Carmen R. (2008) The Importance of Bureaucratic Oversight Mechanisms: The Case of the Inspector General. *The American University*.
<https://www.bpastudies.org/bpastudies/article/view/67/145>
- Ashraf, Nava, Bandiera, Oriana, Davenport, Edward and Lee, Scott S. (2019). Losing Prosociality in the Quest for Talent? Sorting, Selection, and Productivity in the Delivery of Public Services.
https://ashrafnava.files.wordpress.com/2019/10/losing_prosociality_final.pdf
- Ayyangar, N. Gopaldaswami Ayyangar (1949) “Report on Reorganisation of the Machinery of Government” *Government of India Press*.
- Bandiera Oriana, Best Michael Carlos, Khan Adnan Qadir & Prat Andrea (2020) “The Allocation of Authority in Organizations: A Field Experiment with Bureaucrats,”. NBER Working Papers 26733. *National Bureau of Economic Research*.
- Banuri, Sheheryar and Keefer, Philip (2013) Intrinsic Motivation, Effort and the Call to Public Service *World Bank Policy Research Working Paper No. 6729*, Available at SSRN:
<https://ssrn.com/abstract=2370149>

- Becker, Gary S., and George J. Stigler (1974) "Law Enforcement, Malfeasance, and Compensation of Enforcers." *The Journal of Legal Studies* 3, no. 1: 1-18. <http://www.jstor.org/stable/724119>.
- Bellé, Nicola (2013) "Experimental Evidence on the Relationship between Public Service Motivation and Job Performance." *Public Administration Review* 73, no. 1 : 143-53. <http://www.jstor.org/stable/23355447>.
- Bertrand, Marianne, Burgess, Robin, Chawla, Arunish and Xu, Guo. (2019) The Glittering Prizes: Career Incentives and Bureaucrat Performance. https://faculty.chicagobooth.edu/-/media/faculty/marianne-bertrand/research/april-2020-update/glitteringprizes_r3_final.pdf
- Bertrand, Marianne, Burgess, Robin, Chawla, Arunish and Xu, Guo. (2015) Determinants and Consequences of Bureaucrat Effectiveness: Evidence from the Indian Administrative Service. <http://economics.mit.edu/files/11199/>
- Bó, Ernesto Dal, Frederico Finan, and Martín A. Rossi (2013) "Strengthening State capabilities: The role of financial incentives in the call to public service." *The Quarterly Journal of Economics* 128, no. 3 : 1169-218. <https://www.jstor.org/stable/26372521>.
- Business Standard (2012) "We cannot have a 100% risk-averse bureaucracy: Edited excerpt from Prime Minister Manmohan Singh's speech on Civil Services Day on April 21 in New Delhi", https://www.business-standard.com/article/opinion/-we-cannot-have-a-100-risk-averse-bureaucracy-112042200007_1.html
- Callen, Michael and Gulzar, Saad and Hasanain, Syed Ali and Khan, Muhammad and Rezaee, Arman (2015) Personalities and Public Sector Performance: Evidence from a Health Experiment in Pakistan . *NBER Working Paper* No. w21180, Available at SSRN: <https://ssrn.com/abstract=2607368>
- Choudhury, Mita & Mohanty, Ranjan (2019) Utilisation, Fund Flows and Public Financial Management under the National Health Mission. *Economic and Political Weekly*. 54. 49-57.
- Coviello Decio and Guglielmo Andrea and Spagnolo Giancarlo (2016) The Effect of Discretion on Procurement Performance . *CEPR Discussion Paper* No. DP11286, Available at SSRN: <https://ssrn.com/abstract=2783286>
- Cowley, Edd and Smith, Sarah. (2013) Motivation and mission in the public sector: Evidence from the World Values Survey. *The Centre for Market and Public Organisation*. <http://www.bristol.ac.uk/media-library/sites/cmpo/migrated/documents/wp299.pdf>.
- Dasgupta Aditya and Kapur Devesh (2017) The Political Economy of Bureaucratic Overload: Evidence from Rural Development Officials in India . Available at SSRN: <https://ssrn.com/abstract=3057602>
- Department of Public Grievances and Redressal (2010) "Survey of Civil Servants" *Government of India*. https://darpg.gov.in/sites/default/files/Civil_Services_Survey_2010.pdf
- Dery, David (1998). "'Papereality' and Learning in Bureaucratic Organizations Administration & Society" - *ADMIN SOC.* 29. 677-689. 10.1177/009539979802900608. https://www.researchgate.net/publication/249625243_Papereality_and_Learning_in_Bureaucratic_Organizations

- Diamond, Michael A. (1985) "The Social Character of Bureaucracy: Anxiety and Ritualistic Defense." *Political Psychology* 6, no. 4 (1985): 663-79.. doi:10.2307/3791022.
- Ehmke, Ellen (2012) "'Ideas in the Indian Welfare Trajectory' Welfare Regimes in the Global South". *Journal für Entwicklungspolitik*. XXVIII 1-2012, S. 80-102.
https://www.mattersburgerkreis.at/dl/oMkrJMjknJqX4KooJK/JEP-1-2012_06_EHMKE_Ideas-in-the-Indian-Welfare-Trajectory.pdf
- Ferguson, John-Paul, and Sharique Hasan. "Specialization and Career Dynamics: Evidence from the Indian Administrative Service." *Administrative Science Quarterly* 58, no. 2 (2013): 233-56.
<http://www.jstor.org/stable/43546649>.
- Ghate, Prabhu (1998) "Reforming the Civil Service: Meeting Crucial Need for Expertise." *Economic and Political Weekly* 33, no. 7 : 359-65. <http://www.jstor.org/stable/4406409>.
- Government of India (2001) "Approach paper to the Tenth Five Year Plan" Planning Commission.
- Government of India (2019) "Department of Personnel Affairs Annual Report 2018-19" *Ministry of Personnel, Public Grievances and Pensions*.
- Government of India "Service Profile for IAS" (n.d.) Department of Personnel Training.
<https://cseplus.nic.in/Home/DisplayPDF?streamId=PCsUnEplvZihdzEe8FEMf/ozdm2Z1SV9EtWCRovKRC3lakWb5Az6zBHUA5aOBE/F63T7xmhv7oprudau8IxE7qwEbpFY7FdzRY38CgzX0Ow3cxPusYL1aWOaLZjLhzSg>
- Griffith, T.L., Nordbäck, E., Sawyer, J.E. et al. (2018) Field study of complements to supervisory leadership in more and less flexible work settings. *J Org Design* 7, 10
<https://doi.org/10.1186/s41469-018-0034-5>.
<https://jorgdesign.springeropen.com/articles/10.1186/s41469-018-0034-5>
- Gruber, Judith (1987) *Controlling Bureaucracies: Dilemmas in Democratic Governance*. Berkeley: *University of California Press*, <http://ark.cdlib.org/ark:/13030/ft1g500470/>
- Guilherme Lichand and Gustavo Fernandes (2019) The Dark Side of the Contract: Do Government Audits Reduce Corruption in the Presence of Displacement by Vendors?
<https://www.econ.uzh.ch/dam/jcr:ec360d66-9272-4a8d-9e4d-65245e586d32/TheDarkSideOfTheContract.pdf>
- Gulzar Saad., & Pasquale Benjamin J (2017). Politicians, Bureaucrats, and Development: Evidence from India. *American Political Science Review*, 111(1), 162-183. doi:10.1017/S0003055416000502
- Gupta, Akhil. (2012) *Red Tape: Bureaucracy, Structural Violence, and Poverty in India*. *Duke University Press*. 10.1215/9780822394709.
- Hanna, Rema, and Shing-Yi Wang (2017) "Dishonesty and Selection into Public Service: Evidence from India." *American Economic Journal: Economic Policy* 9 (3): 262-90. DOI: 10.1257/pol.20150029
- Hendryadi, Suratna, Suryani & Budi Purwanto | Md. Mahmudul Alam (Reviewing editor) (2019) Bureaucratic culture, empowering leadership, affective commitment, and knowledge sharing behavior in Indonesian government public services, *Cogent Business & Management*, 6:1, DOI: 10.1080/23311975.2019.1680099.
<https://www.tandfonline.com/doi/full/10.1080/23311975.2019.1680099>

- Heyman, Josiah (2012) "Deepening the Anthropology of Bureaucracy." *Anthropological Quarterly* 85, no. 4. doi:10.2307/41857300.
- Honig, Dan and Pritchett Lant (2019) "The Limits of Accounting-Based Accountability in Education (and Far Beyond): Why More Accounting Will Rarely Solve Accountability Problems." *Center for Global Development*, Working Paper 501.
- Hull, Mathew S. (2012) *Government of Paper: The Materiality of Bureaucracy in Urban Pakistan*, Berkeley (California): *University of California Press*, 320 pages.
- Hull, Matthew S.(2003) "The file: agency, authority, and autography in an Islamabad bureaucracy", *Language & Communication Journal* 23(3):287-314, doi:10.1016/S0271-5309(03)00019-3
- Iyer, D. (2011). Tying Performance Management to Service Delivery: *Public Sector Reform in Malaysia*, 2009-2011.
https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/Performance%20Management%20Malaysia_ToU_1.pdf
- Iyer, Lakshmi, and Anandi Mani (2012) "Traveling Agents: Political Change and Bureaucratic Turnover in India." *Review of Economics and Statistics* 94 (3) (August): 723–739.
 doi:10.1162/rest_a_00183. <http://nrs.harvard.edu/urn-3:HUL.InstRepos:33782993>
- Jakiela, Pamela (2018) "Three Lessons from the World Bank's New Worldwide Bureaucracy Indicators Database" Commentary and Analysis, *Centre for Global Development*.
<https://www.cgdev.org/blog/three-lessons-world-banks-new-worldwide-bureaucracy-indicators-database>
- Kahneman, Daniel; Tversky, Amos (1979). "Prospect Theory: An Analysis of Decision under Risk". *Econometrica*. 47 (2): 263–291. doi:10.2307/1914185. ISSN 0012-9682. JSTOR 1914185.
- Kalaj Jozefina, Rogger Daniel and Somani Ravi (2020) "Bureaucrat Time-Use and Productivity: Evidence from a Survey Experiment". Working Paper.
http://www.danrogger.com/files/papers/KalajRoggerSomani_2020_Bureaucrat%20Time%20Use.pdf
- Kapur, Devesh (2020) "Why Does the Indian State Both Fail and Succeed?" *The Journal of Economic Perspectives* 34, no. 1 : 31-54. 0. doi:10.2307/26873528.
- Khemani, Stuti (2007) "Does delegation of fiscal policy to an independent agency make a difference? Evidence from intergovernmental transfers in India" *Journal of Development Economics*. Volume 82, Issue 2,
- Krishnan, K.P. and Somanathan, T.V. (2017) "The Civil Service." Rethinking public institutions in India. Edited by Devesh, Mehta, Pratap Bhanu, and Milan Vaishnav. 2018. *Oxford University Press*. Print. Pp 339-416
- LaForge, G. (2016). Changing a Civil Service Culture: Reforming Indonesia's Ministry of Finance, 2006-2010.
https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/GL_CC_Indonesia_MOF_FORMATTED_5May2016_ToU_1.pdf
- Leaver, Clare. (2009) "Bureaucratic Minimal Squawk Behavior: Theory and Evidence from Regulatory

- Agencies.” *American Economic Review*, 99 (3): 572-607.
- Levitt, Steven D. and Dubner, Stephen J. (2006). “Freakonomics: A Rogue Economist Explores the Hidden Side of Everything”, p.22, Penguin UK
- Lichand, Guilherme and Gustavo Fernandes (2019), “The Dark Side of the Contract: Do Government Audits Reduce Corruption in the Presence of Displacement by Vendors?”, *University of Zurich*, Switzerland, mimeo.
- Majeed, R. (2010). Strengthening Public Administration: Brazil, 1995-1998.
https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/Brazil%20Public%20Administration%20ToU_1.pdf
- Mangla, Akshay (2015) “Bureaucratic Norms and State Capacity in India: Implementing Primary Education in the Himalayan Region.” *Asian Survey* 55, no. 5 : 882-908.
<https://www.jstor.org/stable/26364317>.
- Maria Paula Gerardino & Stephan Litschig & Dina Pomeranz. 2017. “Distortion by Audit: Evidence from Public Procurement,” *NBER Working Papers* 23978, National Bureau of Economic Research, Inc.
- Mathew, A. Santhosh and Purohit, Bhumi (2020) “India’s public finance architecture is the real culprit in Gorakhpur and Bhagalpur”, *LiveMint*.
<https://www.livemint.com/Opinion/I6UMVabJwiukGs7rB5bmSM/Indias-public-finance-architecture-is-the-real-culprit-in-G.html>
- Maurice Yolles. (2016). Understanding Bureaucracies. DOI: 10.13140/RG.2.1.2125.0809. *Liverpool John Moores University*
- Md. Morshed Alom (2020). Public Sector Organizational Culture: Experience from Frontline Bureaucracies [Online First], IntechOpen, DOI: 10.5772/intechopen.91177. Available from:
<https://www.intechopen.com/online-first/public-sector-organizational-culture-experience-from-frontline-bureaucracies>
- Media Cloud. MIT Center for Civic Media and the Berkman Klein *Center for Internet and Society at Harvard University*.
- Merchant, Minhaz. (2012) “Indian Asphyxiation Service (IAS)”. *Economic Times Blog*.
<https://economictimes.indiatimes.com/blogs/headon/indian-asphyxiation-service-ias/>.
- Mishra, Twesh (2016) “Cannot Progress in 21st Century With 19th Century Administration: PM Modi”, *Bloomberg Quint*, <https://www.bloombergquint.com/politics/cannot-progress-in-21st-century-with-19th-century-administration-pm-modi>
- Muralidharan, Karthik (2016) “A New Approach to Public Sector Hiring in India for Improved Service Delivery,” *India Policy Forum*, National Council of Applied Economic Research, vol. 12(1), pages 187-236.
- Peter, Guy B (2018) “The challenge of policy coordination”, *Taylor & Francis Online*,
<https://www.tandfonline.com/doi/full/10.1080/25741292.2018.1437946>
- Prendergast, Canice (2001) The Limits Of Bureaucratic Efficiency. *University of Chicago & NBER*.

- http://web.mit.edu/14.282/www/Prendergast_BureaucraticEfficiency.pdf
- Press Information Bureau (2020) "Cabinet approves "Mission Karmayogi" - *National Programme for Civil Services Capacity Building (NPCSCB)*"
<https://pib.gov.in/PressReleaseDetailm.aspx?PRID=1650633>
- Press Trust of India (2019) "153 IAS officers appointed on central deputation in 2018-19, lowest in last 5 years" *The Economic Times*. https://economictimes.indiatimes.com/news/politics-and-nation/153-ias-officers-appointed-on-central-deputation-in-2018-19-lowest-in-last-5-years/articleshow/71792555.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst
- Rasul Imran, Rogger Daniel, Williams Martin J (2018) "Management and Bureaucratic Effectiveness Evidence from the Ghanaian Civil Service. World Bank Policy Research Working Paper 8595. *World Bank Development Economics Development Research Group*
- Rasul, Imran., Rogger, Daniel., and Williams, Martin J. (2017). Management and bureaucratic effectiveness: A scientific replication. *International Growth Centre*. Reference number: S-33301-GHA-1.
<https://www.theigc.org/wp-content/uploads/2017/07/Rasul-et-al-2017-Final-report-1.pdf>
- Rema Hanna and Shing-Yi Wang (2017) Dishonesty and Selection into Public Service: Evidence from India. *American Economic Journal: Economic Policy*, 9(3): 262–290
<https://doi.org/10.1257/pol.20150029>
- Sanyal, Sanjeev (2020) "Risk vs Uncertainty: Supervision, Governance & Skin-in-the-Game", Government of India, *Ministry of Finance*, Discussion Paper No. 1/2020-DEA
- Schultz, Thomas M (2005) "Organizational culture: An impetus to influence organizational behavior and decision making" . *Graduate Student Theses, Dissertations, & Professional Papers*. 8752.
<https://scholarworks.umt.edu/etd/8752>.
<https://scholarworks.umt.edu/cgi/viewcontent.cgi?article=9787&context=etd>
- Scott, James C (1998) "Seeing Like a State. How Certain Schemes to Improve the Human Condition Have Failed." *New Haven and London: Yale University Press*.
- Shleifer, Andrei, and Robert W. Vishny (1993) "Corruption." *The Quarterly Journal of Economics* 108, no. 3 : 599-617. <http://www.jstor.org/stable/2118402>.
- Singh Arkaja (2020) "Hunger, COVID-19 and The Indian Administrative State", *Centre for Policy Research Working Paper*.
- Susan Rose-Ackerman, Bonnie J. Palifka. (2016). Bureaucratic Corruption. In *Corruption and Government: Causes, Consequences, and Reform* (pp. 51-92). Cambridge: *Cambridge University Press*. doi:10.1017/CBO9781139962933.004
- Szucs, Ferenc (2020) "Discretion and Corruption in Public Procurement" Working Paper
https://drive.google.com/file/d/1-2f_OEZp6j1cSxeTR1YEUtHzA-SDNnzG/view
- ThePrint Team (2018) "Parliament amends anti-corruption act: Will it weaken the law or restore fairness?", ThePrint <https://theprint.in/talk-point/parliament-amends-anti-corruption-act-will-it->

weaken-the-law-or-restore-fairness/88379/

Vaishnav Milan, Khosla Saksham (2016) “The Indian Administrative Service Meets Big Data” *Carnegie Endowment for International Peace* <https://carnegieendowment.org/2016/09/01/indian-administrative-service-meets-big-data-pub-64457>

Vanusia, Phiroze (2020) “Greek, Latin and The Indian Civil Service.” *The Cambridge Classical Journal* 51 (2005): 35-71. <http://www.jstor.org/stable/44698241>.

Williams, Martin J. (2015) From Institutions to Organizations: Management and Informality in Ghana’s Public Bureaucracies. https://martinjwilliamsdotcom.files.wordpress.com/2015/09/martinwilliams_frominstitutionstoo rganizations_150915.pdf

World Bank, “Worldwide Governance Indicators 1.1.” <https://info.worldbank.org/governance/wgi/> <https://datacatalog.worldbank.org/dataset/worldwide-bureaucracy-indicators>

Yang, Dean (2004) Can Enforcement Backfire? Crime Displacement in the Context of Customs Reform in the Philippines. *University of Michigan, Ford School of Public Policy Working Paper No. 02-010*, Available at SSRN: <https://ssrn.com/abstract=546523> or <http://dx.doi.org/10.2139/ssrn.546523>

NOTES

ⁱ We are grateful to Niranjana Rajadhyaksha for his guidance at all stages of developing this working paper, from conceptualisation and methodological set-up to analysis and editorial feedback. We are also grateful to Sharan M.R. for his regular inputs and written contributions. We would also like to thank Vikram Sinha, Gyanendra Badgaiyan and Tanvi Ravel Mehta for their comments and suggestions and Sridhar Ganapathy for his assistance with web-design.

This paper benefited greatly from the insights of our interviewees, Gyanendra Badgaiyan (IDFC Institute; former civil servant, Government of India), Yamini Aiyar (Centre for Policy Research), Gulzar Natrajan (civil servant, India; Global Innovation Fund), Momodou K. Dibba (civil servant, Government of The Gambia), Del Francis Wreh (Executive Director, LIMPAC (Policy Think Tank), Government of Liberia), M N Reddi, (IDFC Institute; former civil servant, Government of India), Devesh Kapur (Paul Nitze School of Advanced International Studies, John Hopkins University), Daniel Rogger (World Bank), Wu Wei Neng (Chandler Institute of Governance; former civil servant, Government of Singapore), Aneetha Warusavitarana (Advocata), Ravi Ratnasabapathy (Advocata), Sarinder Kumari (former civil servant, Government of Malaysia), Siddharth George (Boston University; former civil servant, Government of Singapore), Santhosh Mathew (Bill and Melinda Gates Foundation; former civil servant, Government of India), Bhuvana Anand (Co-founder, Trayas) and K. P. Krishnan (former civil servant, Government of India).

ⁱⁱ While risks are decisions where potential outcomes and their likelihoods are known in advance, decisions under uncertainty take place without either information. For example, during the initial weeks of the COVID-19 pandemic, when little was known about viral transmission rates and the media of transmission. At the time, governments had to decide about mobility and access restrictions under *uncertainty*. However, in later stages of the pandemic, the *risk* of transmission in different circumstances could be estimated based on case data and other information collected up to that point.

ⁱⁱⁱ Author analysis using www.mediacloud.org

^{iv} Selected based on the relevance to the subject of this working paper

^v Authors measure this in terms of decrease in procurement prices and find that autonomy granted to officers with ineffective monitors can reduce price by 20%.

^{vi} Note that BDOs are not IAS officers, however they normally report to District Collectors, who are IAS officers.

^{vii} In fact, although applicants may be less prosocial on average, when put through a recruitment process (that focuses on talent) the ultimately selected candidates are equally likely to be pro-social.

^{viii} The authors, Honig and Pritchett, define accounting-based accountability as efforts to address accountability deficits by focusing primarily on improving what can be counted and verified. They argue that introducing greater accounting-based accountability will only very rarely be the appropriate solution for addressing accountability problems by exploring the role of Accountability ICT in the education system performance.

^{ix} Transparency International / Corruption Perception Index <https://www.transparency.org/en/countries/india>

^x Transparency International / Global Corruption Barometer: Asia Pacific.

<https://www.transparency.org/en/gcb/asia-pacific/asia-pacific-2017>