

Local Capacity Building and Local Development in the Philippines: Appreciating Capacity Building for Decentralization

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Capacity building is crucial to making development happen in a decentralized system. Over ten years of Philippine experience in decentralization has seen its effects in the administrative, the political and even the economic realms of local governance. These are documented in this study, beginning with the clarification of purposes for which capacity building efforts have been initiated, the major players involved and their corresponding roles, the various strategies adopted, the trends and directions that have emerged, the remaining challenges as well as the approaches instituted in managing all these concerns.

Introduction

Capacity building is more than training. It is about making conditions right to make things happen. In the realm of decentralization, capacity building must foster the enabling environment for decentralization. Moreover, for decentralization to become meaningful, capacity building ensures as well a genuine sense of community-hood, a convergence of peoples' beliefs, traditions, and culture. Capacity building at its core is tasked to make decentralization and therefore development a shared experience.

This study aims to situate capacity building in the broader scope of decentralization in the Philippines and highlights the effect of the Local Government Code of 1991 in the decentralization process.

This study also attempts to pinpoint trends, directions, and challenges for capacity building ten years beyond the implementation of the Code and offers a glimpse of the innovative strategies currently being undertaken in

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response to the new and emerging challenges which the country faces in furthering decentralization.

In the Philippines, the process of looking at the state of capacity building in relation to the Code started in 1996, at the height of the implementation of the Department of the Interior and Local Government's (DILG) Integrated Capability Building Program (ICBP). In 1997, the DILG started a series of assessments and evaluations of the ICBP components which gave the imprimatur to look deeper into the dynamics between capacity building providers and "recipients." In 1998, together with the Development Academy of the Philippines (DAP) and the United Nations Development Program (UNDP), the Local Government Academy (LGA) pursued a structured investigation of decentralized capability building¹ in five provinces ("recipients") in the Philippines and their relation to the Institutes for Local Government Administration (ILGAs) ("providers"). In one way or the other, this study is a product, perhaps a synthesis of the department's learnings from the series of activities undertaken since and much of the narratives presented were culled from the studies that emanated from the capacity building review process.

Development Objectives of Capacity Building in the Philippines in the Light of Decentralization

The development objective of capacity building is to transform local authorities into self-reliant, autonomous and active partners within the national framework of development by creatively utilizing the powers made available to them under the Local Government Code (LGC). Such development objective adapts the fundamental management principle of decentralized governance wherein national government simply provides broad policy directions while local governments perform actual service delivery. Apart from this, it is envisioned that there is greater convergence among local government units, business sector, and civil society in the three legs of governance namely: administrative, political, and economic with greater focus on the priority thematic areas of poverty alleviation and food security (DILG 2001a).

In the Philippines, fundamental changes in the local government system have taken place with the enactment of the Local Government Code of 1991. Backed up by pertinent Constitutional provisions, the Code has laid the foundation for the grant of autonomy to local authorities.

One of the net effects of LGC implementation triggered the renaissance in building the capacities of local authorities. It widely opened the doors for individual and institutional capacity building providers to engage with local

government. Reminiscent of the era of community development of the 1950s, a whole era of capacitating local government units (LGUs) unfolded.

Along the way, some capacity building strategies made impact in local governance and some did not. Whatever happened to the local government units as the primary beneficiaries during this long stretch of capacity building renaissance is of interest to all of us.

Ten years after the Code was legislated for implementation, the total impact of these capacity building initiatives has been articulated in many forms. In totality, local capacity building propels local development (Antonio 2000).

A Snapshot of the Capacity of Local Authorities Ten Years After the Enactment of the LGC

Ten years of the LGC's implementation has resulted in significant changes in the local governance arena. As DILG Secretary Jose D. Lina, Jr. reported during the First Philippine Local Government Congress last October 2001, there have been many tangible improvements, particularly in the way LGUs are now managing their affairs. LGUs have become more innovative in their efforts to improve their organizational capacities in performing their functions. More than 400 cases and models of good practices in local governance in various thematic areas have been recognized and showcased.

Remarkable initiatives have also been undertaken in planning the development in their areas, taking into consideration the different aspects such as economic, environment, social, and cultural factors. Of the 715 LGUs that submitted their State of Local Government Reports, 91 percent reported having Annual Development Plans and 95 percent have Annual Investment Plans. The LGUs have also demonstrated abilities in the exercise of their corporate powers and authority. They are now empowered to raise money on their own to finance development projects. An increasing number of LGUs have been accessing financial grants, entering into Build-Operate-Transfer schemes, contracting loans, and investing in certain enterprises to propel economic growth in their localities. They are also exploring and engaging in partnerships and alliances with other LGUs and resource institutions to maximize as well as generate more resources.

The implementation of the Code has also brought changes in the way national government agencies relate with the LGUs. There have been a number of reforms instituted by national line agencies to respond to the needs of the local governments, including changes in budgeting and auditing. The study conducted by the Ateneo School of Government shows that national and

local relations have consistently been improving. There has also been progress in harnessing people's participation in local governance over the past ten years. This is manifested by the increase in the number of functioning local special bodies as well as the number of programs and projects implemented by the LGU with people's organizations (POs) and nongovernment organizations (NGOs).

Key Actors and General Descriptions of Their Roles in Capacity Building

Effort to build the capacities is a continuous and growing concern in local governance arena. Various institutions and sectors undertake several initiatives and interventions to address such concern. Among these are the following:

The Department of the Interior and Local Government

Through its regional offices and bureaus particularly the LGA, DILG implements a wide mix of capacity building programs in support of its mandate to strengthen the administrative, technical, and fiscal capabilities of local government offices and personnel. The Department is at the forefront in capacity building efforts.

National Government Agencies

The different national line agencies especially those whose functions have been devolved to LGUs are also implementing programs that have capacity building component. Majority of theme-focused capacity building programs, e.g., sustainable development, gender, and development, emanate from these agencies.

The Leagues of Government

A positive trend in capacity building is the increasing involvement of the leagues of government in determining the needs of the sector and coming up with a unified stand on issues and concerns affecting local governance. The different leagues of government have also been actively embarking on various capacity building efforts for their respective members. They have been actively involved in conducting policy dialogues with national line agencies to address specific issues and concerns and recently, the leagues have been venturing into specialized areas such as urban management. A staple strategy

undertaken by the leagues fosters exchanges through "sisterhood" and sharing of best practices in local governance.

The Official Development Assistance (ODA) Programs

The Philippines is a recipient of various overseas development assistance packages. Among ODA's priorities is capacity building. Substantial donor resources have been poured into this sector. Bulk of donor resources went mainly to developing technologies for institution building, institutional strengthening, and public participation in support of codal requirements of setting up public sector and civil institutions. Currently, the utilization of donor resources has shifted towards building capacities to manage development programs particularly those that focus on poverty reduction.

Academe and Other Learning and Resource Institutions

Consistent with the "Town and Gown"² concept introduced in the mid-90s, the academe and other learning and resource institutions are continually developing various programs to enhance the competencies of LGU officials. Usually credited as diploma courses and designed as outreach programs, they target mostly the governors and mayors as primary clients. A number of academic institutions based in the regions also provide technical assistance to LGUs, thereby building as well the capacities of technical personnel such as the planning officers and human resource development managers. Most of these programs have been implemented through the ILGAs³ and Centers for Local Governance.⁴

Civil Society Organizations

The civil society organizations are likewise becoming active in their capacity building work. They have recently exerted efforts in building their own capacities to intensify their participation in local governance. They have implemented continued capacity building at the community level to enhance their contribution in attaining sustainable development. They are also actively involved in forging networking and linkages among themselves as well as with the LGUs and other government entities to widen areas of participation and define strategic engagement in governance. This remains to be a major challenge within the civil society. Recently, they have conducted researches that shed light on bottlenecks in promoting people's participation at the local level.

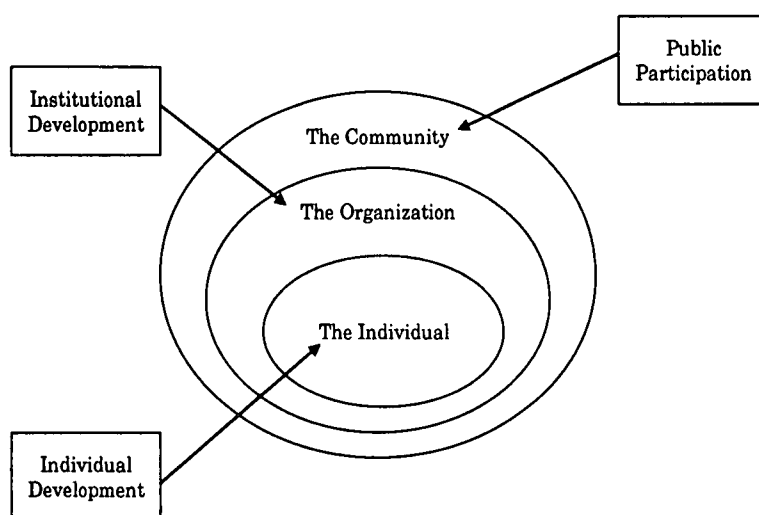
Focus of Capacity Building Programs in Advancing Decentralization

The range of capacity building programs for local authorities varies in terms of its form (pedagogy) and substance (canons). Beyond form and substance however, a deeper appreciation of the programs can be best articulated in the context of the “Capacity Assessment and Development in a Systems and Strategic Management Context”⁵ of the United Nations Development Program (UNDP).

Ideally, capacity issues are first addressed at the individual level, then at the organizational or entity level and extend towards a broader system that takes into account the public.

In the Philippines capacity building programs can be classified according to the adapted capacity issues illustrated above. However, the typologies do not intend to classify the program as solely concerned with the particular capacity issue. Some programs do cut across the three concentric circles. The circles, as reference points, intend to show the way most programs in the Philippines are designed and pinpoint as well the intended learners/partners of these programs.

Local capacity building practices are directed to the individual, the entity and the broader system. The term “individual” refers to the local government unit functionaries and elected public servants; “entity” refers to LGU, the different departments, sections and units within; and the “broader system” would refer to the civil sector (e.g., academe, NGOs and POs), the national government agencies (e.g., DILG and Civil Service Commission) and the outlying LGUs.



Bulks of the recipients of **individual development** programs are elected local chief executives. These programs are designed to harness a deeper appreciation of public administration structures and processes and requisites of good governance.

Institutional development programs, on the other hand, introduce a myriad of tools to improve governance. Some of these are: the Setting up of Innovations Laboratories, Galing Pook Awards, Local Productivity, and Performance Measurement System, Development Watch, and the Citizen Satisfaction Index.

Moreover, the programs for strengthening **public participation** in the decentralization process are focused on building and strengthening participatory structures, harnessing government-civil society engagements for thematic programs, e.g., health sector reforms, security of tenure, and creation of favorable climates for government-business sector partnerships.

Beyond these three foci however, the idea of replication has of late been taken as a viable strategy. Experiential knowledge, as a preferred source of knowledge, is finding broad appreciation among capacity building stakeholders. Out of these experiential knowledge, a capacity building program on "Decentralization and Local Empowerment" has been developed recently with the assistance of PARAGON-UNDP. It is a modest attempt to project an overview of decentralization, and the various factors related to it in the present context. The module also highlights critical issues that need to be considered by decisionmakers, at all levels of government, for effective and efficient decentralization. Current development directions in the Philippines are very much influenced by the pace of decentralization and as such, local authorities and central agencies need to have an appreciation of the concept and forms of decentralization and develop an insight to examine the extent of decentralization in the Philippines in consonance with their mandates and roles.

The "Decentralization and Local Empowerment" module comprises two main elements:

- The general concepts related to decentralization and local empowerment; and
- Status of decentralization

It is accompanied by the following learning areas:

- Concept and Definition of Decentralization, Forms of Decentralization;

- Achieving Decentralization: The Need for Structural, Functional, Fiscal, Capacity Building, Participatory, and Legislative Reforms Required;
- The Country Framework for Decentralization;
- Progress in Decentralization: International Experiences;
- Advantages and Disadvantages of Decentralization; and
- Challenges of Decentralization

The decentralization program is a generic capacity building module driven by processes that shall spur discussions on suggestions to further decentralization, analyze its strengths and weaknesses and the development of an action plan to improve the existing situation.

Trends and Directions

In a study⁶ conducted by Mr. Jaime Antonio (2000) involving 44 documented case studies on local capacity building, some relevant trend, and findings have surfaced. Among these were:

Trends of Capacity Building in Local Governance

- Capacity building efforts are directed towards institutionalizing and strengthening local participatory structures.
- Capacity building efforts are also aimed at mainstreaming thematic concerns e.g., solid waste management, gender in local governance.
- Resources for capacity building are utilized to aid in localizing mandated national programs.

Emerging Principles of Local Capacity Building

- At the individual level, capacity building interventions impact more on project-based needs where capacity building is more specified and specialized. Designing and linking capacity building efforts that demonstrate their application to a concrete project or output reinforce the new knowledge and skills gained by the

learner. Capacity building at the LGU level is more meaningful and appreciated when the program draws LGU-related outputs from the learners. To require learners to come up with plans or project proposals following capacity building is to communicate to them the importance of their newfound contribution to the LGU.

- Establishing a balanced LGU and civil sector participation is becoming an accepted norm in capacity building. Clear accountabilities of stakeholders that stem from a common vision and equitable contribution of resources are a requisite in the participation scheme. On the other hand, the readiness of the LGU and civil sector engagement is continually being strengthened through advocacy.
- Culture sensitive processes and systems are being identified, recognized, and utilized. This is apparent in the prioritization, recognition, and utilization of local knowledge over modern knowledge introduced by experts where and when applicable.
- Building the capabilities of teams is preferred to individual capacity build up for this has better chances of being sustained. This was also one of the lessons generated in the implementation of LGSP Phase I,⁷ i.e., training individuals is not a sufficient factor by itself in building LGU's organizational capabilities and competence.

Challenges Confronting Capacity Building

Capacity building in the past ten years of LGC implementation focused mainly on making people and institutions effective and efficient in responding to the requirements of the Code, however making sure as well that the needs of communities are met.

There was also an increasing number of capacity building providers in the area of local governance. Academe, training institutions and even individual experts and consultants have been tapped and have been implementing capacity building programs for LGUs. Foreign assistance has also responded prominently in this sector.

The usual challenge and difficulty facing capacity building programs are the proper coordination with the LGUs concerned to ensure that these activities and programs are also aligned with the priorities of local authorities. Moreover, there also seems to be a need to coordinate the activities among various line agencies to (again) avoid overlapping and

conflicts and at the same time allow LGUs to prepare themselves for the different demands and requirements of these programs.

At present, LGUs take serious stance at pursuing capacity building efforts and yet after ten years of LGC implementation, there is no clear indicator or measure of their level of capacities and how they were able to utilize such capacities. This is a critical gap that must be addressed to determine the capacities still needed to be developed among the LGUs and to track the progress in their performance through the application of these capacities. This shall likewise avoid the wastage of meager resources for capacity building for this will minimize duplication and repetition of capacity building interventions.

Translation and application of gained capacities of the LGUs to improve basic service delivery are still wanting. One implementation gap in capacity building programs is the lack of follow-through activities to ensure that the capabilities built are indeed used and applied. There is also a need to make sure that the initiatives introduced are sustained by the specific stakeholder. In addition to this, capacity building interventions are often seen as a "one-shot" deal rather than a part of a planned effort to move towards attaining a certain goal. A wider perspective of capacity building must have to be advocated, i.e., it is not limited to training nor specific activity but must be viewed as an integral part of the strategy of a locality to create and generate the outcomes and impacts it wants to achieve.

A corollary reason for this is the changing concept of capacity building itself. Capacity building in the past emphasized individual skills. This was based on the assumption that if individuals can be given more and better skills, it will follow that the organization can better manage service delivery systems. However, given the changes in the environment and shifts in governance, capacity building may need to shift its focus from improving individual knowledge to improving institutional learning. It has to focus more on redefining institutional incentives and enabling organizational change. Capacity building needs to focus on building the competence of organizations operating at the local level to be public entrepreneurs and to be managers of change capable of orchestrating interlinked service delivery (Ellison 1998). This implies the need to link and support enhancement of individual competencies with establishment of systems, processes and other enabling mechanisms supportive of the acquisition and application of the "new learnings."

Ten years of LGC have also shown that a number of LGUs are capable of demonstrating good local governance practices. A proof of this is the recognition given by the *Galing Pook* Awards Foundation to such practices. However, these practices are not maximized in terms of replicating these in

other areas in order to benefit other LGUs. While there have been efforts to share these best practices through conferences and *lakbay-aral* (cross-visit) programs, real propagation and upscaling of these practices and learning to a higher level where more LGUs could benefit are still much to be desired.

Resource limitations also pose a major constraint in addressing the capacity building requirements of local governments on a sustained basis. LGUs often put on hold or deprioritize capacity building efforts in lieu of delivering other services needed by the locality. This is especially true in the fourth, fifth or sixth class municipalities whose budgets are sometimes just enough to pay for the salaries of their employees. Moreover, capacity building institutions at the national level are often inaccessible and unaffordable. On the other hand, local structures have limited capacities to provide training and capacity building interventions in the locality.

The growing demand for innovative modes of local governance has motivated various organizations, institutions and private individuals to venture into capacity building initiatives. The challenge is mapping of capacity building institutes, their course offerings, and other programs. At present, there is also an information gap pertaining to the number and types of these resource and learning institutions. More importantly, there is lack of information concerning the types and quality of the programs they offer. In relation to this, the absence of standards in terms of the content and effective delivery of capacity building programs fosters the proliferation of below par capacity building providers as well as mediocre capacity building interventions.

Insofar as training programs are concerned, continuous provision of appropriate course curriculum and methodologies to address increasing demands for new and appropriate skills and approaches in governance remains to be desired. Use of innovative approaches that facilitate and foster learning such as information exchange, visits, dialogues, and others have to be applied and maximized to generate the desired impact and changes. Moreover, these resource institutions offer varied programs and make use of different capacity building interventions. In view of this, there might be a need to have convergence among them to share experiences and learn from each other with the end view of determining proper delineation of roles and expertise in designing better capacity building programs and to avoid duplication of efforts. However, certain parameters have to be developed to facilitate better partnership and cooperation among these local resource and learning institutes.

Due to the inflow of capacity building programs and providers, the capacity building environment for local governance has also often been characterized as overlapping, uncoordinated, unsynchronized capacity

building efforts, leading to a general dissatisfaction of clients particularly the LGUs. While the DILG has been mandated to build the capacities of LGUs, its current capacities only allow it to monitor and direct its own programs and projects.

Central to DILG's role as the authority in local governance sector is to provide clear direction to the sector through formulation of policies and implementation of plans. Its role is also to set standards to ensure the quality of LGU performance as well as to ensure the quality of the services provided by local resource institutions. Unfortunately, policies as far as capacity building is concerned still seem to be wanting and limited. DILG lacks control over a clear guideline or framework that should guide the efforts of other institutions in building the capacities of LGUs.

In relation to this, some conflicts still exist between national line agencies (NLAs) and LGUs as far as performing their roles is concerned. There is a need to continually reassess and define the relationship between LGUs and NLAs and promote better partnership between them particularly in building local capabilities. There is a need for the NLAs to evolve from a control-and-supervision role, to one that emphasizes technical assistance and capacity building. NLAs have to let go of some of their "implementing" role to play a greater role of LGU "enablers" which can provide the necessary technical assistance to help LGUs perform their functions.

Emerging Responses to the Challenges Facing Capacity Building

The need for capacity building providers to be constantly attuned with the needs of the locality requires that the providers must be situated at the base of the needs as well. For local authorities, access to quality capacity building resources at the right time and at affordable cost is important.

Monitoring systems designed to cull local data in relation to the needs of local authorities are currently being perfected by the DILG through the Local Productivity and Performance Measurement System (LPPMS). The system provides indicators and programmatic local services standards intended to measure the efficiency, effectiveness, adequacy and equity of services provided by local authorities to allow them to take corrective actions towards better delivery of services.

The pursuit of empowered local authorities who are in control of their capacity building agenda has been articulated by the LGA and the DAP during the course of implementing the project "Strengthening Decentralized Capacity Building Efforts for Sustained Local Development" with the UNDP.

Decentralizing the mandate of capacity building by making the local authorities active players as opposed to passive recipients would entail a change of mindset among the key actors of capacity building. This changed mindset is premised on these requisites:

- LGUs need continuous upgrading of their knowledge, skills and attitudes to enable them to meet the evolving and increasingly complex demands of their constituents. Foremost is for LGUs to know what their capacity building needs are and to be equipped with appropriate technologies related to identifying their capacity building agenda.
- Interventions for building the capacity of LGUs must be responsive. Responsiveness can be gauged in terms of accessibility (i.e., distance from LGUs), affordability, and availability (i.e., suitability of interventions to local needs and conditions).
- These interventions should be geared towards the attainment of the LGU's vision. They should, therefore, be holistic and integrated, not fragmented, in nature (DAP 1999).

Given this, the LGA-DILG is slowly positioning itself from a direct service delivery to a national "orchestrator" of capacity building, with the intention to manage the demand and supply side of capacity building. At the local level, in partnership with the DILG Regional, Provincial and Municipal Offices and Local Resource Institutes, this would mean helping LGUs set up their own capacity building systems and helping them determine the right matches and mixes of providers. Managing the supply side would mean providing a system where capacity building providers can operate and helping them manage programs attuned to the priority needs and processes of local authorities. To safeguard quality, designing and managing a peer accreditation and certification system⁸ is also a possibility the LGA is currently looking at (Sacendoncillo 1999).

Although direct assistance in building the capacities of LGUs is still imperative, the DILG is currently proposing that overseas development assistance resources must focus more on strategic concerns as far as building the capacities of local authorities. Specifically, the department proposes that UNDP invests in preparing, developing and enabling the capacity building environment in local governance to ensure sustainability of such efforts and at the same time foster the continuous learning and improvement within the sector.

In this context the Local Governance Institutional Capacity Building (LOGIC) facility is being developed and proposed. Essentially, this facility aims to:

- rationalize, direct, and manage the capacity building efforts aimed at achieving effective local governance;
- create the enabling mechanisms that will foster a learning environment at the local level;
- track the performance and improvement in the local capacities;
- deliver quality, appropriate, and responsive capacity building interventions; and
- establish mechanisms to upscale and further promote excellent practices in local governance.

The capacity building interventions under this Facility are directed more towards the capacity building providers and enablers (DILG 2000).

On the other hand, with the global community in mind, LGA can look at propagating the Philippines' experience in capacity building by sharing learnings with other countries and in the process enrich its own processes based on other countries' experiences.

The Philippines' rich experience in capacity building in decentralization abounds with lessons and is a valuable resource for replication. The country's advanced stage of decentralization compared with others makes it an ideal country for modeling and pilot-testing. Likewise, the fact that the Philippines has developed a competent pool of human resource that could be tapped for a replication initiative has given impetus to a collaboration between LGA-DILG and the PARAGON Regional Governance of the UNDP. Under a Memorandum of Agreement, the two offices have agreed to develop and pilot-test a training module on Decentralization and Local Empowerment. Both activities have been already undertaken with the assistance of the Institute for Housing and Urban Development Studies (IHS) of The Netherlands. Moreover, a training of trainers has recently been held as a preparatory step towards the dissemination and adoption of the training module nationwide and in other Asian countries, which are instituting decentralization as part of their democratization process. The end goal of this Program is to strengthen and deepen the implementation of decentralization as a strategy for creating democratic, effective, responsive, and accountable governance (LGA-PARAGON-UNDP 2002).

Conclusion

Decentralizing the mandate of capacity building by making the local authorities active players as opposed to passive recipients would entail a change of mindset among the key actors of capacity building.

Capacity building providers must continuously redefine their role and function to keep in pace with the growing need of local authorities to remain relevant and competitive in the local government capacity building arena. Moreover, given the changing capacity building environment and the increasing number of key actors at the local level, the providers are also faced with finding their niche in assisting the LGUs in order not to duplicate and complement the efforts of other existing resource institutions.

Two things are certain:

- (a) The need to continually strengthen the capacities of capacity building providers in the local governance arena to handle the imperatives of local development and decentralization with local authorities remains. This means that the increasing demands of the constituency, limitations in resources and complexity of the environment in which the local authorities operate require the capacity building providers to be more attuned to the priority needs of the locality.
- (b) New paradigms should be developed to fill the gaps and draw the paths towards building empowered local authorities who are in control of their capacity building agenda.

Piecing together the many facets of capacity building in a decentralizing environment, capacity building can be viewed as a convergence of programs that seek to do the following:

- Empowering local authorities to identify and define their capacity building needs;
- Helping local authorities access capacity building resources that can respond to their needs;
- Developing national policies that nurture an environment conducive to capacity building;
- Strengthening of capacity building networks that begin at the local level and extend to the national and global environments (DAP-LGA 2000).

Endnotes

¹This UNDP assisted project is called "Strengthening Decentralized Capability Building Efforts Towards Sustained Local Development" (PHI 96-007).

²Town to mean the local government unit and the Gown represents the academe situated in or anywhere near the local government unit.

³The ILGA concept is one of the delivery mechanisms of ICBP.

⁴A facility organized under the USAID-GOLD project.

⁵According to the UNDP's "Capacity Assessment and Development in a Systems and Strategic Management Context," capacity issues can be analyzed at three levels. Often, capacity issues are first addressed at the individual level, then at the organizational or entity level. However [as noted above], capacity must be understood at the systems level as well. By definition, a system is a regularly interacting or interdependent group of items forming a unified whole. This can apply equally to the human world as it does to the physical world. Capacity is defined here in a systems context where a set of entities operates toward a common purpose and according to certain rules and processes.

⁶This study entitled "Local Capacity Building Initiatives" was conducted by Mr. Antonio for the Development Academy of the Philippines in January 2000. This was part of the project "Strengthening Decentralized Capacity Building Efforts for Sustained Local Development" of UNDP.

⁷Culled from the "Lessons Learned" Chapter of LGSP Phase I Synthesis Report.

⁸The LGA is currently embarking on an Accreditation and Certification System for Urban Managers in partnership with the League of Cities of the Philippines and the Housing and Urban Development Coordinating Council.

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