

Control Processes and Red Tape in Philippine Bureaucracy: Notes on Administrative Inefficiency

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While bureaucracy was conceived as the most rational form of organization characterized by precision, speed, and unambiguity, the realities of public organizations today present an inefficient organizational structure that relies heavily on established rules and regulations. Formalized procedures in government, particularly in the implementation of control measures designed to prevent bureaucratic misbehavior, have brought with them other attendant problems, commonly referred to as "red tape." As such, red tape is associated with some control measures of bureaucracy especially when bureaucrats pursue ritualistic adherence of the rules regardless of end goals and terminal values by which these rules have been created. In this sense, it becomes important to define the causes and effects of control measures, especially when they begin to serve as obstacles in the efficient performance of government functions. Red tape must also be defined and clearly identified if bureaucracy is to surmount its challenge.

Introduction: Bureaucracy and Counterbureaucracy

Bureaucracy today faces many unanswered questions. Since Max Weber developed his theory of bureaucracy,¹ much insight and studies in-

quiring into realities of public organizations have unfolded a plethora of agonizing propositions and ironies.² While Weberian bureaucracy was originally conceived as the "purest" and most rational type of legal authority, its meaning and understanding have been corrupted and fallen in ill-repute in the lexicon of present day governmental administration. For Weber, bureaucracies suggested large, complicated administrative organizations characterized by "precision, speed, unambiguity, knowledge of files, continuity, discretion, unity, strict subordination, reduction of friction and of material and personal

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¹ See Max Weber, *The Theory of Social and Economic Organization*, trans. A. M. Henderson and Talcott Parsons (New York: Oxford University Press, 1947). There is considerable literature on Weberian bureaucracy found in standard Public Administration textbooks. Among the useful reference are: Amitai Etzioni, *Modern Organizations* (Englewood Cliffs, New Jersey: Prentice Hall, 1964), pp. 50-57; and Michel Crozier, *The Bureaucratic Phenomenon* (Chicago: University of Chicago Press, 1964).

² These studies include the works, among others, of Alvin W. Gouldner; *Patterns of Industrial Bureaucracy* (Glencoe, Illinois: Free Press, 1954); Robert K. Merton *Social Theory and Social Structure*, rev. ed. (Glencoe, Illinois: Free Press, 1957); and Philip Seznick, *TVA and the Grassroots* (New York: Harper and Row, 1949).

costs . . . ”³ As such bureaucracy represented an organization that operated a hierarchical and formalized structure, observing divisions of labor and task specialization, long lines of communications, militating against interpersonal relationship, and relying upon formal rules and regulations resulting, among others, in impersonality among the participants.⁴

Sadly, the dynamic and functional realities of public organization have long obscured these visions. Government today maintains a bureaucracy antithetical to Weberian perspectives. In much the same way of the tragedy suffered by early theories of absolute separation of politics from administration, the politics/administration dichotomy proposition of Woodrow Wilson's 19th century Public Administration, Weberian bureaucracy has not endured the punishing strains of reality.

In sharp contrast to Weber's pristine views, today's bureaucracy employs a system that heavily relies on established rules and regulations that generally stifle “administrative vitality and managerial creativity.”⁵ As a result, in a manner of “dysfunctions,”⁶ the same formalized rules and regulations designed to institute efficiency and impersonality have

not allowed much flexibility in government functioning, bringing nagging problems of bureaucratic inability to deal with day-to-day pressures inherent in public organizations. As in the machine analogy used by Weber, and reminiscent of the early functional prescriptions advocated by Frederick W. Taylor and the other fallen idols of the classical management tradition⁷ most bureaucracies today operate mechanically not with the speed and precision envisioned by the classicists, but helplessly trapped in the wilderness of rituals, rules, and regulations that often refuse or at best avoid confronting situations demanding novel or imaginative action. When faced with a situation deviating from the perspective of established procedures, the bureaucrat is stymied into indecision, and often, downright inaction, until such time that new guidelines can be formulated to guide, to rationalize — or to “officialize” his conduct. The resultant effect is excessive “red tape,” the “micro-imperialism” of officials, where “succession of goals and ritualized procedures have become ends in themselves and are adhered to,” no matter how inappropriate the situation⁸

³ As cited in D. S. Pugh, D. H. Hickson and C. R. Hinnings, (eds.), *Writers in Organization* (Middlesex, England: Penguin Books, Ltd., 1971). The book provides a handy compendium of major works of various writers and theorists on organization and management.

⁴ Marshall Dimock and Gladys Dimock, *Public Administration* (New York: Holt, Rinehart and Winston, 1964), p. 76.

⁵ *Ibid.*, Dimock and Dimock provide an excellent analysis of the pathologies of bureaucracy.

⁶ See Merton, *op. cit.*, p. 51.

⁷ Classical management theory is of course represented by such works as Frederick W. Taylor, *Scientific Management* (New York: Harper, 1947); Henri Fayol, *Industrial and General Management*, trans. Constance Storrs (London: Sir Isaac Pitman and Sons, 1930); and the various works and papers of Frank and Lilian Gilbreth and Henri Gantt.

⁸ Christopher Hood, “Administrative Diseases: Some Types of Dysfunctionality in Administration,” *Public Administration*, Vol. 52 (Winter, 1974), p. 440. See also Hood, *The Limits of Administration* (London: John Wiley and Sons, 1976). The latter is a more elaborate and incisive study of administrative failures.

This "over-organization" has thus spawned a metadilemma that saw the metastatic growth of policies and supplemental procedures, of rules and regulations, and of guidelines originally intended as control mechanisms against bureaucratic excesses and rapacity, but which in the long-run, are translated into stumbling blocks that gestate or breed administrative inefficiency.

Traditionally, administrative inefficiency has been associated with pejorative labels as "graft and corruption," and "red tape." Obviously, these are but two horns of the dilemma of administrative inefficiency. The rhetoric of the policy and efficiency debates that prominently figured in recent years, particularly in the Philippines, however, has articulated a host of concerns side by side with graft and red tape. These include an overwhelming list that incorporates problems of ineptness of government officials, incompetence, habitual absenteeism and tardiness, "moonlighting" or the acceptance of other jobs that compete with functions of public office. Ironically, these bureaucratic ills are still in need of a definitional taxonomy; inter-meshing of these ills has been largely inferred rather than concluded.

Aware of the magnitude of this area of study, this paper confines itself to the problem of control as related to or associated with red tape in the bureaucracy. On this score, the paper does not attempt to examine the various "diseases" of bureaucracy. Much has been said along that realm, particularly in the landmark studies of "bureaupathology" or the "sick" negative performance of public officials.⁹ Instead,

⁹Victor Thompson, *Modern Organization* (New York: Alfred A. Knoff, Inc., 1961). pp. 152-177.

the purpose here is to isolate and inquire into the pathologies of control systems along definitional terms, with specific reference to red tape as a resultant externality. While this treatment limits the discussion to a certain problem, it affords adequate inquiry into a particular problem instead of lumping it together.

More Research on Red Tape Needed

Red tape has often been a staple excuse offered by government functionaries in rationalizing administrative inefficiency or inaction. The same bureaucrat who articulates glossy pronouncements against red tape in one instance can be equally guilty in another. It is regrettable that the understanding of red tape — what causes it, how it evolves, etc. — is inadequate. To be sure, empirical and serious research along these lines, especially in the Philippine bureaucracy, has proven to be spotty.¹⁰ It is time that serious attention and scholarly concern be given to red tape as a bureaucratic phenomenon rather than alluding to it in a general context.

At the outset, it is admitted that there are knotty issues which when scrutinized incisively can be subjective. What, for instance causes red tape? Or, more succinctly, why is there red tape? When does a government procedure become red tape? The initial problem may for all intents and purposes, be a definitional, if not a tautological one: What is red tape? Apparently, red tape, like beautiful

¹⁰On September 1981, Executive Order No. 735-A was issued by the President to various government agencies to make a comprehensive study of the problem of graft, corruption, red tape, and inefficiency.

things, may lie only in the eyes of the beholder; it may be perceived only by the person inconvenienced by the procedure. There are, of course, questions of goal conflict, of succession, like when certain sectors of the public cry for ample protection and control on say, spending of government funds. If and when well-intentioned bureaucrats do institute measures of control to satisfy this demand, other sectors may call this "bureaucratic," or over-indulging into too much paper work.

The Control Problem: Opening New Vistas

As can be gleaned from the above, the problem is very much associated with control. It has been pointed out that control system can be self-defeating¹¹ in the sense that they bring with them undesirable side-effects especially when applied to the wrong context.

. . . thus control processes seldom yield consistent results along the whole of their range. The lion-tamer's whip operates on a precarious threshold between two levels of arousal; and many other processes are only effective in a narrow range between nil effect, diminishing returns and "reversal points" where the *opposite of the desired effect* is produced¹² (underscoring supplied).

Based on this perspective, it is cogent to infer that red tape problems in Philippine bureaucracy are commonly induced by distortions either in the conceptualization or in the enforcement of control systems. It is submitted that control policies are

often developed into stringent procedural safeguards, which, when interpreted from the standpoint of enforcing agencies become ends in themselves regardless of the terminal values for which these safeguards have been formulated. One symptom of this metadilemma lies in the programmatic view of bureaucrats who represent their agencies. This implies that bureaucrats are often enamoured with their unit's individualized program of control without appreciation of the overall objectives of control. A minor clerk, for instance, may deny a client published copies of the agency's accomplishment reports or plans simply because he had been instructed not to release information without a written request ("put it in writing" is a typical jargon circulating among bureaucrats) and a corresponding clearance from superiors. The clerk has thus interpreted this to become an absolute rule even with established agency policy pronouncements of making its accomplishments public. This may be attributed to a simple blurring of vision or a confusion of images, but then again, the same clerk may have been chastised in the past for indiscriminately issuing information. This may be a problem for policy analysis which needs to define "certain objectives without causing unacceptable changes in background variables."¹³ To be sure, the "bureaucrat obeys because it is — or seems right to follow orders, and he thus has a duty to do so." In no uncertain terms, a bureaucrat who follows directives from hierarchical

¹¹Hood, "Administrative Diseases . . .," pp. 441 and 445.

¹² *Ibid.*

¹³Richard Hartwig, "Rationality and the Problems of Administrative Theory," *Public Administration*, Vol. 56 (Summer 1978), p. 172.

superiors is acting in a legally responsible manner.¹⁴

Generally, when control systems are established in government, the general idea that comes to mind is to restrain or regulate certain processes, activities, or behavior. This "restrictive mold" has been closely associated with the control function to the extent that it has been habitually premised on compliance. This has engendered, for the most part, the view that control systems are nothing but mechanisms against administrative misbehavior.

While such management tools as Planning-Programming-Budgeting Systems (PPBS), Management by Objectives (MBO), and Zero-Based Budgeting (ZBB)¹⁵ as conceptualized during

¹⁴ *Ibid.*, pp. 174-175.

¹⁵ For Planning-Programming-Budgeting-Systems; Management by Objectives; and Zero Based Budgeting. PPBS developed during the administration of President Johnson in the United States, and was designed to accommodate the multiple functions of planning, programming and budgeting. One useful introductory material on PPBS is Allen Schick's article, "The Road to PPBS: The Stages of Budget Reform," in Fremont J. Lyden and Ernest G. Miller (eds.), *Planning, Programming, Budgeting: A Systems Approach to Management* (Chicago, Illinois: Markham Publishing, 1970), pp. 26-52. MBO had its beginnings in the works of Peter Drucker, for instance, *The Practice of Management* (New York: Harper, 1954); and *Managing for Results* (New York: Harper and Row, 1964). This was picked up later on by other authors like John Humble, *Management by Objectives in Action* (London: McGraw-Hill, 1970). ZBB, on the other hand, had its early conceptualization in the works of writers like Peter Phyr. There is not enough space to lengthily examine these concepts. They have been cited because they represent current management "tools" or approaches advocating "objective-oriented, total systems" view towards management problems.

the last two decades, have opened avenues towards a direction where objectives and goals are given substance instead of process or functions, control systems have notoriously been employed as mere household help against bureaucratic misfeasance. There appears nothing wrong with this except that control has been completely relegated to a gate-keeping role, focused, as it is, on curbing misdemeanor rather on instilling efficiency.

But this cannot be helped, at least for the time being. The lineage of control functions found its early conceptualization along these lines particularly in works of such classicists as Henri Fayol. In 1916, Fayol, developing his science of management, defined "control" as activities consisting "of verifying whether everything occurs in conformity with the plan adopted, the instructions issued, and principles established." It has for its object "to point out weaknesses and errors in order to rectify and prevent recurrence."¹⁶ Contemporary writers maintain that control "includes any rational approach used by men to overcome perversities of either their natural or their technological environment."¹⁷ "Management control" is "a systematic effort to compare performance with predetermined standards, plans or objectives in order to determine whether performance is in line with these standards and presumably in order to take any remedial actions required to see that human and other corporate responses are being used in the most effective

¹⁶ Fayol, *op. cit.*, p. 107

¹⁷ Fremont E. Kast and James Rosenszweig, *Organization and Management: A Systems Approach* (New York: McGraw-Hill, 1974), p. 466.

and efficient way possible in achieving corporate objectives."¹⁸

On the other hand it is asserted that the control process involves three steps: (1) establishing standards; (2) measuring performance against these standards and (3) correcting deviations from standards and plans.¹⁹ In essence, control functions serve both as a corrective and preventive measure against deviation from set standard and plans.

While these representative definitions offer a simplistic and tidy appraisal of the role of control, much of its substance loses meaning, as in Weber's bureaucracy, from complications inherent in their application.

The initial problem of control begins with their derivations especially when conceived or formulated by specialists who tend to concentrate on the positive consequences of their proposals. The framers may concentrate on details involving procedures and techniques and their own individualized value premises without considering the long-run impact of the policy on innocent third parties.

When control frames think, plan, and reflect in isolation without considering the entire spectrum of government work, administrative dysfunctions are bound to occur directly or otherwise. The result is a control

failure which produces consequences contrary to those desired or envisioned by the framers. This may be labeled as "latent dysfunctions" where unintended effects of a behavior or act produce about consequences that lessen the adaptation or adjustment of the system.²⁰

From this derives the idea of iatrogenic doctor-induced diseases, or those situations where patients die not because of the disease for which they are being treated, but rather as a result of side effects resulting from improper disease management.²¹ This idea can be applied to refer to iatrogenic control systems, or those formulated by specialists to deal with certain administrative problems, but which, in the long-run weakens the capabilities of the system. Iatrogenic control measures generally breed three obvious consequences. The first is a counter-productive effect on the operations of agencies where the policy is enforced. This usually evolves when a control policy competes with other concerns. Thus, "clawback" device in budgeting is very much evident in the Philippines. Unspent balances of appropriations of national government agencies are, as a policy, reverted to the national fund. The negative effect is that instead of saving money, individ-

¹⁸Robert J. Mockler, "Developing the Science of Management Control," in Mockler (ed.), *Readings in Management Control* (New York: Appleton-Century-Crofts, 1970), p. 14. This book provides a useful collection of papers and articles on control and related topics.

¹⁹Harold Koontz and Cyril O'Donnel, *Management, A Systems and Contingency Analysis of Management Functions* (New York: McGraw-Hill, 1976), p. 641.

²⁰Merton, *op. cit.*

²¹Hood, *The Limits of Administration*, p. 151. He mentions for instance the lack of antiseptic techniques which causes hospitals to become breeding grounds for diseases, eventually leading to death of patients admitted for other ailments. Thus, a patient admitted for treatment of appendicitis may die not because of the disease itself, but because of complication, say infections, arising from improper clinical management.

ual agencies are encouraged to go on a spending spree at the end of the year rather than have their savings reverted, especially when this would mean possible reduction in their appropriations for the succeeding year.²² Of course, a vintage, and probably familiar example involves unreasonable standardization of salary scales of civil servants. The pursuit of equity in pay standards has largely resulted in the government's inability to compete with the private and foreign sectors in hiring or retaining competent manpower—definitely a concern notoriously expressed in agencies where technical manpower is needed.

A second impact of iatrogenic control policies involves externalities exerted on innocent third parties. In recent years, horrifying incidents of improper usage of funds in some agencies, or at worst, of reported wide-scale corruption of civil servants have been exposed. Thus, when control measures are employed to contain this, the effects may not only bring about severe consequences on the recalcitrant organization, but on other innocent third parties as well. Philippine bureaucracy is replete with cases of irregularities in the spending habits of certain agencies which result in enactments or executive orders of general application. Thus, when the intention is to put a check on the procurement patterns of equipment among some agencies which may have abused its buying patterns, the resultant policy may be one that introduces a complete ban on purchase except those that have prior review or expressed clearance from higher authorities. The result may be costly paperwork and documentation and con-

sequently delay in the programs of the agencies which in the first place were not at all the object of the ban. Regrettably, this also entails additional paperwork on the entity assigned to review purchases. On the other hand, the reaction to an absconding civil servant may be to employ safety valves, such as in recent cases, the requirement of fiscal clearances from places of residence and assignments on the part of personnel applying for terminal leaves. This safeguard may have a negative effect on an innocent majority which has to absorb the rigors of the requirement as a result of some cases. Lamentably, those who are incapable of getting themselves cleared may "buy" their way through, and circumvent the requirement.

In an article on business and government relations, Jose Concepcion, Jr. cites a study conducted by the Philippine Chamber of Commerce and Industry (PCCI) which identified problem areas experienced by the private sector with government. Concepcion identified the problem of control systems of government that negatively impinge on innocent businessmen. Thus, citing the PCCI study, he points out:

The overall impression from the response is that government offices continue to saddle private firms with a lot of paper work, complex procedures, overlapping functions and numerous regulations. One respondent aptly summarized the problem. He contended that government bureaucracy and red tape, government policies and regulations are often strictly designed to foil unscrupulous operators. However, these unscrupulous businessmen merely bribe their way to circumvent stringent laws and regulations, while most law-abiding businessmen comply with the law and suffer

²² *Ibid.*

inefficiencies and delays in the process.²³

All these suggest the state of control policies in bureaucracy which public administration must deal with squarely. Control devices are carved not because of a diligent and perspicacious appraisal of their need, but as spontaneous exaggerated reaction to remedy a certain transient public problem. They are iatrogenic in the sense that they do not completely solve problems but create additional ones. It is amusing to note that incrementalist and piecemeal mode of policy making has been endemic in recent years.

Another dilemma of control lies in the interpretation and understanding of terms embodied in the policy document, as articulated in such instruments as executive orders, circulars, memorandum orders, implementing guidelines, rules, and regulations. A good number of problems involves semantics. Words "are notoriously flexible."²⁴ To this it is pointed out that "the ability to write, whether clearly or with deliberate obscurity, has traditionally been hailed as the greatest of bureaucratic virtues." Philosophers of language have agonized for a long time over problems, such as vagueness, context and metaphorical meaning.

Context, it seems, is everything. Meanings are the outcome of a complex, ongoing process of social learning. Words can be given exact definitions only in

specific contexts and at specified points in time . . .²⁵

While it can be agreed that problems of this nature cannot be helped, they do impinge on the behavior of bureaucrats who tend to introduce their own values in the understanding and implementation of control policies. A specific case for instance is the rule on purchase of supplies, materials, and equipment, with the term "emergency purchase."²⁶ Under the circular, emergency purchase may be resorted to by national government agencies and government-owned or controlled corporations under the following conditions:

. . . whenever the supplies, materials and equipment are *exceptionally urgent* or absolutely *indispensable* to prevent immediate danger to, or loss of life and/or property.

Whenever the supplies are to be used in connection with a project or activity which cannot be delayed without causing detriment to the public service.²⁷ (underscoring supplied)

What is "exceptionally urgent or absolutely indispensable?" What is detrimental to the public service? As has been suggested, the matter can be highly judgmental. The problem becomes evident when the terms are operationalized and assigned values by those who implement, enforce or audit the transaction. Will the emergency purchase of fire extinguishers for example be properly categorized as "exceptional" or "absolutely indispensable?" Under what conditions?

²³Jose Concepcion, Jr., "Business and Government: Towards a Climate of Credibility," *Bulletin Today* (9 April 1982). This is part of a series of three articles.

²⁴Hartwig, *op. cit.*

²⁵Hood, *The Limits of Administration*, pp. 59-66.

²⁶See *Commission on Audit Circular No. 78-84*, 1 August 1978.

²⁷*Ibid.*

On whose premise? The requisitioning entity? The approving authority? The auditing body? The person who may be extra apprehensive about fire may give the transaction a stamp of "emergency," while another may let it wait and go through the natural process of purchase. In the long-run bureaucrats quibble and grapple with bread-and-butter definitions that cause delay in positive action.

A third problem that closely relates to the impurities of language is the issue of conformity and non-compliance under conditions where situational variances are evident. When is it right to deviate? When is it good to be flexible? The exigencies of certain situations may demand an approach to a problem not embraced by written procedures. It is argued that the basic problem in control often lies in achieving a workable balance between creativity and conformity.

... expressed somewhat differently, this is the problem of encouraging initiative on the part of subordinates by keeping operations flexible, and minimizing the chances of error by keeping operations standardized.²⁸

Conformity may involve a psychological discussion on the decision-making abilities of civil servants, who, as creatures of bureaucracy, are supposed to be rationally guided by rules and regulations. The decision to deviate for the sake of flexibility, and presumably for more efficient operations is, however, an unpleasant one; it is critical. For one, it establishes precedents that breed a lot of non-programmed decisions. One author notes that "habit, ener-

gized by standard operating procedures and the rigidity of the organizational structure encourages conditions for programmed decisions."²⁹ Citing Gresham's Law, it is pointed out that programmed activity tends to drive out non-programmed ones, simply because prolonged unstructured situations are generally painful.³⁰

The bureaucrat, thus faced with an unpatterned situation not conveniently provided within the scope of written procedure, agonizes on a decision to conform or deviate. Strict control functions inherent in bureaucracies however, encourage employees to "go by the book," to avoid innovations and chances of errors which put black marks on the records.³¹ Under these conditions, the "safe" option is to resolve the rigors of unprogrammed activity by trying to have them "legitimized." The natural course of action — or inaction — are familiar: seek the opinion or clearance of higher authorities (usually through queries in case of "agency to agency" issues, or request for clarification, etc.); arrange for the issuance of "legitimizing" procedures; and require added documentation, justification, or other supporting papers to give the act a semblance of validity. The effect is substantial delay in processing, and, "the accumulation of records, to prove compliance, resulting in "paperaserrie," as the French call it.³² This formalism and ritualism

²⁹ As cited in Chris Argyris, "Some Limits of Rational Man Organization Theory," in *Public Administration Review*, Vol. 33, No. 3 (May-June 1973), p. 257.

³⁰ *Ibid.*

³¹ Thompson, *op. cit.*

³² *Ibid.*

²⁸ William Travers Jerome III, *Executive Control — The Catalyst* (New York: Wiley, 1961), p. 75.

develop at a pace so as to eventually lead "to punctilious adherence to formalized procedure" which may be exaggerated to a point where primary concern with conformity to the rules interferes with the achievement of the purposes of the organization, in which case, the familiar phenomena of technicism or red tape of the official occurs.³³ The product of this process of displacement is the bureaucrat who never forgets a single rule binding his actions and hence is unable to assist many of his clients.

The process may be briefly recapitulated: 1) an effective bureaucracy demands reliability of response and strict devotion to regulations; 2) such devotion to the rules lead to their transformation into absolutes; 3) this interferes with ready adaptation under special conditions not clearly envisaged by those who drew up the ground rules; 4) thus, the very elements which conduce toward efficiency in general produce inefficiency in specific instance...³⁴

As suggested earlier, the bureaucrat may try to ease or resolve the tension by legitimizing the act through new procedures or impositions of requirements that will substantiate compliance. To sum up a categorical effect: elaborate systems of internal review have thus developed in many public agencies, which often cause unnecessary delay in needed action.³⁵

³³ Robert K. Merton, *Bureaucratic Structures and Personality*, in Merton, *Social Theory* . . . , pp. 195-206.

³⁴ *Ibid.*

³⁵ Joseph L. Massie, *Essentials of Management* (Englewood Cliffs, New Jersey: Prentice-Hall, 1979), p. 230.

In time, the emphasis leads to the "transference of the sentiments from the aims of the organization rules."

Adherence to the rules, *originally conceived as a means becomes transformed into an end in itself*; There occurs the familiar process of displacement of goals whereby an instrumental value becomes a terminal value . . .³⁶ (underscoring supplied)

The phenomenon has been diagnosed and labelled with various terms, from the concept of "trained incapacity" to notions of "occupational psychosis" or "professional deformation." "Trained incapacity" in this sense refers to "that state of affairs in which one's abilities function as inadequacies or blind spots."³⁷

While the above might appear an oversimplification, the phenomenon is so real as to constitute the needless proliferation of papers for its own sake. The need to fill and accomplish, double check, counter check, and file dozens of forms, requisitions, affidavits, etc. for every trivial item becomes apparent. In most cases, control systems tend to be tedious, because, among others, of the need of bureaucrats to be assured that compliance is enforced. It has thus become customary to let papers shuffle and pass through a maze of units and office so much so that before it reaches the approving or releasing stage, a collection of initials, counter initials, signatures ("recommend approval"; "reviewed by"; "checked by"; "noted by"; "appraised by" are but the common boxes) are accumulated, some of which are of questionable value and

³⁶ Merton, *op. cit.*, p. 51.

³⁷ *Ibid.*

importance. Thus, in a study of corruptive behavior of a government bureau, it is pointed out that "application for a license or concession takes as much as 26 steps, from the time the reception clerk stamps the application papers 'received' until the same clerk releases it with the bureau director's approval, with as many as 15 persons handling the papers in the process."³⁸

Edgardo J. Angara, President of the University of the Philippines (UP), points out in his speech before the Philippine Executive Academy UP in Baguio last 7 January 1982 another reason why bureaucracy tends to be saddled with too many requirements:

... bureaucracy is characterized by a *bewildering labyrinth of requirements and regulations that often succeed in trapping and insulating the bureaucrat*. The end result, from our experience, is insensitivity, inflexibility, and mistrust. Underlying the bureaucratic environment is a cynical assumption that citizens are basically dishonest. *Such a basic lack of trust translates itself into rigid rules and forms of control*. While rules are necessary to protect public interest, yet too many controls stifle the very initiative that the private sector is most naturally capable of exercising.³⁹ (Underscoring supplied).

Lack of trust indeed may be another obstacle that results in control failures and ultimately leads to too much paperwork. When interlinked

with insecurity of the official on compliance, the alternative measures to resolve the tension could mean staggering documentation.

Lamentably, when the bureaucracy treats the public as if they were crooks out to defraud the government, they ultimately begin to behave like crooks. The transformation may be a psychological one borne out of mistrust.

The irony of this menagerie of protective control devices, however, lies in the fact that from an economic point of view, the measures may become too costly: they cease to be worthwhile. The example of elaborate security measures which tend to be more expensive than the immediate cash value of the pilferage they are designed to prevent may be cited.⁴⁰ Thus, in the Philippines, this can be typified by simple purchase transactions of items costing, say from P500.00 to even P2,000.00. If the purchase is made by way of open canvass which is generally done to ensure that government is given the opportunity to compare prices of items offered by different suppliers, then such requirements as to justification on why the purchase is necessary, brand preference, abstract of canvass, quotation from various suppliers, usually at least three, requisition sheet, stock position, sheet, purchase or letter order, certification as to availability of funds, etc. may be needed to support the procurement

³⁸ Ledivina V. Cariño, "Boundary Encounters and Corruption Behavior," *Philippine Journal of Public Administration*, Vol. 21, No. 2 (April 1957), p. 151.

³⁹ Edgardo J. Angara, Speech before the Philippine Executive Academy, Baguio, 7 January 1982.

⁴⁰ Hood, *The Limits of Administration*, p. 150.

of the items.⁴¹ Before payment can be made, other supporting papers may be needed, such as inspection report, acceptance report, original copy of the dealer/supplier's invoice, delivery receipt voucher, etc. If the volume of similar purchases within this cost range are multiplied tenfold, then the amount spent in terms of man-hours and documentation (e.g., seeking out quotations, filling up forms, justifying, etc.) may definitely be more than the few pesos saved from acts of dishonesty or misdemeanor. It is in this light that the need to estimate the total cost of regulatory activity, with specific reference to what is termed as "compliance costs" or that which the citizen or business entity, or another government agency for that matter, is required to undergo or spend comply with the regulations involved is pointed out. A good argument for this point may be offered.

The resulting cost may be found staggering and grossly disproportionate when compared to the benefit expected from the specific regula-

⁴¹ Some of these requirements are enumerated under COA Circular No. 78-84. Others, such as justifications as to necessity or brand preference, may be internal control measures of individual agencies. It is significant to note that in May 1871, *Administrative Order No. 450* abolished the requirement of submission of Letter of Confirmation (BIR Form No. 19.65-A-1) and the BIR Tax Clearance Certificate (BIR Form No. 17-61) as prerequisites for participation in any public bidding, as embodied under *Administrative Order No. 66* and reiterated under COA Circular 78-84 (IV-No. 7). Other requirements may be needed depending on the item purchase. Thus procurement of fabric (uniforms, blankets, etc.) may need a sampling report as to quality, especially if specifications or type of material are made in the original requisition.

tion. By applying such a measuring standard, we can find out whether the money, time and resources expended by a government agency and its clientele are commensurate with the social benefit it is supposed to create.⁴²

Red Tape: Another Elephantine Problem?

Much of the previous discussion has diagnosed the pathologies of control measures in bureaucracy that generally lead to accumulation of paper work, "over organization," and over conformity or technicism. The identified issues, hazy as they may appear, suggest dysfunctions in control systems of bureaucracy emanating from both a procedural and behavioral stand point. By no means is it professed that this paper captures the entire anatomy of problematic control processes inasmuch as the landscape is wide and the bureaucratic ethos far too overwhelming to cover in one sweep. Other causes may be inferred. One may owe to problems of organizational hygiene-which would tie with the premises established under Parkinson's Law — the theory of multiplication of work and subordinates.⁴³ By and large, bureaucrats may impose a melange of requirements to assign responsibilities and jobs to a burgeoning bureaucratic structure; and as a consequence, may lead to unnecessary redundancy in processing, which, for all intents and purposes, develops into paperwork accumulation. Thus, President Marcos, speaking before the annual convention

⁴² Concepcion, *op. cit.*

⁴³ See C. Northcote Parkinson, *Parkinson's Law and Other Studies in Administration* (Cambridge, Massachusetts: The Riverside Press, 1957), pp. 2-13.

of Philippine Government Employees Association on 8 December 1966, pointed out that "red tape occurs when a minor duty or function is divided up among so many people . . ." Still, this suggests a premise based on a behavioral or an attitudinal framework.

Another point worth mentioning is when requirements are deliberately encouraged so as to saddle clients with obligations that will force them (the clients) to cut through the documentation by paying "speed money." In this case, the problem of graft and corruption becomes apparent. It should be noted that this discussion is confined to problems of paperwork and over-conformity, since it is felt that it would be best to separate the anatomy of red tape from graft and corruption, the latter apparently appearing as consequence of the former.⁴⁴ As such, bureaucrats, may impose a number of requirements to pave the way to commit graft and corruption.

The pejorative label of "red tape" has been denounced by many government officials, private businessmen, and individual citizens. But as suggested earlier, red tape often lies in

⁴⁴ A considerable amount of time was spent discussing whether "red tape" is synonymous with "graft and corruption." Off-hand, graft and corruption may be an outgrowth of red tape, without denying the fact that graft can be committed even without having problems of dishonesty. Graft and corruption should be considered as a deliberate, intentional act of dishonesty. Red tape and its variations may however involve an intended delay or paperwork resulting from overconformity, insecurity, lack of discretion of bureaucrats, etc. Graft and corruption have been substantially discussed and continues to be analyzed in other studies.

the eyes of the beholder, and its exact understanding has been considerably murky. Some definitions refer to it as "the impedimental use of official forms and procedures, which derives from the tapes used to bind English documents."⁴⁵ Others describe it as "order or system carried to extremes."⁴⁶ From all indications however, red tape appears to be a term used to describe unreasonable delay in government transactions as caused, by either one or a combination of the following:

- (1) weak policy making and improper implementation;
- (2) technicism or overconformity of officials who essentially pursue ritualistic adherence to established procedural or legal rules;
- (3) overorganization which involves shuffling of papers in too many units with each pursuing individual regulations or requirements, thereby bringing about copious paper work and documentation; and
- (4) misapplication of rules, policy, or procedures.

A fifth one, which have been admittedly glossed over, involves deliberate attempts by bureaucrats to impose requirements so as to have the opportunity to commit graft and corruption. Concededly, other causes may be offered. It is submitted that the diagnosis offered here does not hope to

⁴⁵ William Morris, (ed.) *The Heritage Illustrated Dictionary* (New York: Heritage Publishing, 1973).

⁴⁶ M. H. Guandolo and Bernard Lipsitz (eds.) *Legal Dictionary*, reprinted by National Book Store with permission from Ottenheimer Publishers, Inc., 1968.

cover and explain the anatomy of red tape in bureaucracy. At most, the caricature above present the phenomena and generate continuing interest in the causes, not simply effects, of red tape.

In recent years, however, government has taken to incorporating control of red tape in its policy pronouncements. Thus, Letter of Instructions No. 565 dated 30 June 1977, for instance, seeks, "to reduce red tape" in procedure involving expenditure. Similarly, Executive Order No. 735 dated 11 September 1981, constitutes a committee assigned, among others, to make "a realistic assessment of the extent and nature, the elements and dimensions of the total problem of graft, corruption, red tape and inefficiency."⁴⁷

The weakness of policy at this stage, however, lies in the fact that definitional premises as to what constitutes red tape are incoherent and untidy. Unlike problems involving graft and corruption, the features of red tape are still subjective, and it is quite easy to label and to ascribe the minutest delays in any government transaction as symptomatic of red tape. The criteria therefore are not clear thereby posing another elephantine problem, for public administration at least for the time being. The practical problem thus is not merely to identify the causes of red tape, but to define what "red tape" is in specific terms so as to give substance to a policy which can realistically treat it. This, however, is not a wholesome task

inasmuch as it involves going into judgmental questions. For one, red tape interlocks with other ills of bureaucracy that may stem from behavior of civil servants that bring about excessive redundancy, over-conformity, and such other antinomies that stand in the way of the efficiency. Still, control and other regulatory policies can be examined and rationalized based on a standpoint of end goals and terminal values. The test of a policy's validity lies not in its inherent correctness, but in its workability, in that it temporarily disposes of an issue through an intelligent resolution of competing claims.⁴⁸ In such a setting, it becomes imperative to mirror red tape out of a morass of bureaucratic control measures, singling out oppressive requirements from legitimate ones. This becomes quite important in that one has to focus both on the management and implemental character of administration while at the same time treating public organization as expressions or instruments of social goals.

Bureaucracy and Red Tape: The Premise and the Promise

The challenges confronting bureaucracy today begins with a premise of rising expectations. While the tradition of Weberian bureaucracy continues to endure in governmental processes today particularly in terms of structure and authority patterns, much of the texture and moft of legalism sacredly cherished today need to be reoriented towards a responsive orientation. As it is, red tape

⁴⁷Letter of Instruction No. 565 issued 30 June 1977 and Executive Order No. 735 dated 11 September, 1981.

⁴⁸William L. Morrow, *Public Administration, Politics and the Political System* (New York: Random House, 1975), p. 5.

in bureaucracy has been a perennial complaint of citizens. For one, attention has been focused towards encouraging values adhering to rigid observance of procedural and legalistic rules without regard to client needs and demands. Thus, the value that prevailed and depicted to be good and worthwhile, or at best rewarding, is that of conformity and obedience. Red tape has been acknowledged as a fixture in bureaucracy, not because of a deliberate and malicious desire to be inefficient, but rather because of substantial neglect in analyzing the factors — the externalities and dysfunctions of policy — that comes with it. It is in this light that bureau-

cracy today faces the challenge of recasting its orientation from a rigid, often mechanical, patterning of activities based on the self-imposed tyranny of rules and regulations to values of responsiveness towards client needs and demands. By and large, the premise of rules and regulation must begin with their individual merits and inherent workability, and not on blind adherence.

The promise of bureaucracy lies in its ability to surmount that challenge. And it is here, in this realm, that public administration both as a discipline and as a profession must direct its efforts.