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**Bridging the Gap in Public Sector Evaluation:
Reconciling Best Practices and Client Recognition in a Mandated Review of a Program**

by

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B.A., University of Winnipeg, 1991
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**A Dissertation Submitted in Partial Fulfillment of the
Requirements for the Degree of**

INTERDISCIPLINARY DOCTOR OF PHILOSOPHY

**We accept this dissertation as conforming
to the required standard**

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ABSTRACT

With a history going back to the beginning of this century, issues of accountability and fiscal responsibility – often under the guise of program evaluation or review – have been at the forefront of decision-making in recent years for programs that rely on government funding. The dissertation concerns the utility of evaluation and review in shaping public policy, and consists of three distinct elements. Starting with an examination of what is required to carry out a review function in complex organizational contexts, the best practices available in the evaluation literature were identified with the purpose of creating a review framework for a program, AMPA, which is administered by a department within the federal government (Agriculture and Agri-Food Canada [AAFC]) to the agriculture and agri-food sector. Given that the framework was put in place to enable its *direct* clients – program and senior managers at AAFC – to obtain a higher calibre review of the program than if it had not been available, it served as an exemplary case study in discovering robust and unique solutions to the barriers facing review initiation and implementation. This strategy for reviewing AMPA included the development of a detailed implementation plan and the situation of the framework in its organizational context.

The second element in the dissertation was an empirical test of the strategy to prepare AAFC for the review of AMPA, and a methodology was devised to appraise the degree of success achieved in serving the program's direct clientele. In short, a questioning of whether or not the review framework was an effective utilization-centered evaluation tool was carried out.

The extent to which the framework was implemented two years after it was created was probed, and it was found that these efforts had been moderately successful.

However, in the dissertation's third part it is revealed that the definition of success derived from best practices in the evaluation literature was inadequate: It should have included an understanding of what the *ultimate* clients in the review of AMPA had in mind in initiating the review. And it is only with an extraordinary – and in terms of everyday review practices, impractical – amount of investigation into Parliamentarians' purpose that this motivation was detected.

My final analysis began by examining the *Agricultural Marketing Programs Act* which governs the program; more precisely, its mandatory review clause which requires AAFC to review AMPA five years after the legislation was enacted. Apart from a few passing references, such clauses have not been examined by academic commentators or public servants in any systematic manner even though there are early indications that program reviews driven by, and supported under the law, may become more prevalent. Five possible explanations to account for the appearance of this clause were proposed, and the available evidence supports the government's concern over the potential trade-distorting implications of AMPA at the time the legislation was debated in, and subsequently passed through, the House of Commons.

In conclusion, by identifying the government's tactic in allaying international attention over the program's impact on trade, one must confront the realization that review efforts cannot meet Parliamentarians' needs, given that these could not have been known within AAFC as the review framework was being developed. (Nor are Parliamentarians' general expectations for performance information widely known). In retrospect, it appears that the formative review tools lauded in the evaluation literature will not meet the requirement of serving a broad public interest. In terms of the vast reporting to Parliament literature, as assessed from a broad interdisciplinary perspective, it is possible to observe that the methods available to practitioners presently are unable to bridge a profound gap between carrying out summative evaluation and identifying effective public policy. This gulf between the promise and performance of evaluation is highlighted in the dissertation, as is the suggestion that doing something right in this domain is not the same as doing the right thing.

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It is better to travel hopefully than to arrive.

Chinese Proverb

In terms of prospective performance – using an evaluative term here – there were many indicators that pointed to an uncompleted dissertation. First of all, the process spanned six years. Not surprisingly, all involved were fatigued and tired of the topic at the end of that time. Secondly, no less than three topic changes occurred (that is an even longer story), and once I had convinced my academic committee at the University of Victoria (UVic) to go ahead with the third option, several substantial changes in focus were recommended to culminate in my case study of review. A third challenge for me was the fact that I started my doctoral program in Victoria, but moved to Ottawa just about the time that my dissertation work began in earnest. Finally, and related to this last point, my topic development, research, and writing stages co-existed with other full-time commitments; namely, teaching at UVic and Carleton University, and working full-time at Agriculture and Agri-Food Canada (AAFC). In light of the above, it is an extraordinary feeling to be writing this acknowledgment as part of a finished document.

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DEDICATION

For Werner.

CHAPTER 1: UNDERTAKING PROGRAM REVIEW IN

THE PUBLIC SECTOR

This dissertation addresses program evaluation in the public sector. Program evaluation has become *de rigueur* and its accompanying interdisciplinary literature is replete with advice for evaluators on what they should do to evaluate government programs. However, the literature largely is silent regarding the challenges of conducting a comprehensive program review¹ within complex, public sector environments.

Thus, a number of questions emerge at the outset of an investigation into the gulf between theory and practice in merging evaluation and governmental programs. For example, “What advice is there for the practitioner in designing and conducting a review of a major program within the public sector environment?”; “What are evaluation best practices and how can they be best applied?”; and also importantly, “What are the motives for conducting program evaluation?”. Indeed, it is reasonable to expect that the actual motives for evaluation may not be obvious, or may be different, than those stated by the decision-makers in government who regularly engage the services of evaluators. In addition, tied to these questions surrounding the motivations behind evaluation are its clients. In the case of an evaluation having multiple clients – such as program managers, politicians, and the public – how are their distinct needs met by the evaluation process?

¹ Program Review, when capitalized, connotes a government-wide initiative that began in 1995 and involved a great deal of down-sizing in the Canadian federal public service to achieve fiscal restraint. In contrast, its meaning throughout the dissertation indicates the ongoing review of programs in a generic sense. A distinction between the terms *review* and *evaluation* appears in the following chapter.

The dissertation begins with an examination of current best practices in public sector evaluation. A rationale is provided for the selection of a particular evaluation methodology in a legislated review of a major federal government program. Next the challenges of conducting this review are considered, and the success of implementing the program review in the federal government environment is described. Finally, the dissertation addresses the issues of motivation for the review of the particular program, and charts its results in terms of meeting the needs of the multiple clients of the review; clients, in fact, who may have envisioned distinctly different realities for the process of conducting the review.

This dissertation is interdisciplinary, combining the domains of public administration, law, psychology and evaluation. This interdisciplinary perspective is unique and important to understanding the legal, motivational, administrative and evaluation issues within the complex public sector environment. A key expected result of this investigation will be to better inform the many evaluators working in governmental contexts about what is required for their efforts to lead to meaningful improvements in public policy. To reach that goal, however, still other questions must be posed to understand the backdrop behind the practice of evaluation in the Canadian federal government.

Three remaining questions are necessary to pose in light of the decades of debate reflected in the program evaluation literature. These are, "Why do governments review their programs?", "What do governments expect to attain by supporting a program evaluation function?", and "Is the motivation behind governments' decisions to evaluate a particular

initiative political or is it in the public interest?“. Finding answers to these basic questions in the literature, however, is rather more difficult, and my dissertation reveals that theorists and practitioners may not be asking the right questions.

This is this case even though issues of accountability and the justification for spending public funds have a long history of being a national concern. In recent times, government bodies in North America have attempted to increase their efficiency and effectiveness in administering the public purse, and in doing so have actively supported a program evaluation function in government. The function certainly has evolved over time, and currently has been based upon the premise that the evaluation literature was sufficient to adequately address the relatively recent requirements to report to Parliament on the performance of a wide variety of government programs.

This dissertation contributes to a better understanding of the need to re-focus the contemporary practice of evaluation, at least in government circles. My use of a particular program to act as a case study provided critical insights into preparing for the review of a particular program in a dynamic, real-world setting. Paramount among these is that without knowing the precise expectations of the ultimate (cf. direct) clients of review – that is, Parliamentarians and the members of the public whom they represent – initiating and subsequently carrying out program review is destined to miss its mark. What follows is a brief summary of the content of each of the seven chapters featured in the dissertation.

The dissertation research is organized along three main lines. The first follows from best practices in the evaluation literature, and details the process involved in preparing for a review of AMPA² as required in the *Agricultural Marketing Programs Act*³, the legislation that governs the marketing program currently offered by AAFC, a federal government department⁴. A significant assumption underlying this work was that the purpose of the review was a transparent one; namely, to assess the relevance / acceptance, cost / benefit, management effectiveness, and results of AMPA⁵.

Chapter 2 begins with some relevant background information, and a brief description of the steps involved in enacting federal legislation. Continuing Chapter 2 is a presentation of key concepts and definitions included in the scope of the dissertation. Next the role of the Treasury Board Secretariat (TBS) as the “general manager” of the federal government is articulated, with a focus on its decades of support of program evaluation in Canada. From there, the evolution of the field of evaluation is traced. What follows is my introduction of rational utilization evaluation, beginning with a presentation of contingency theory which is one approach that attempts to bridge a gap in the literature between the social psychology of the people who work in organizational settings and an understanding of how decisions, such as those related to evaluation, are made. This focus on rational utilization evaluation also includes a consideration of the presence of many modifications (e.g., frameworks) which

² A list of the acronyms used in the dissertation appears in Appendix 2.

³ The *Agricultural Marketing Programs Act* (Bill C-34), and all other legislation cited in the dissertation are featured in Appendix 1.

⁴ AAFC and the department are referred to interchangeably throughout my dissertation.

⁵ The selection of these four criteria are expanded upon in Chapter 4.

have been suggested by commentators over the years to improve the practice of program evaluation and review. In completing Chapter 2, evaluation is distinguished from the emerging practice of review.

To put the dissertation into perspective, background information on AMPA is provided in Chapter 3, and details on its three sub-programs⁶ are provided. Some of the reasons behind the consolidation in 1997 of four preceding statutes into one piece of legislation which now governs AMPA follows the program information. Finally, Chapter 4 opens with a detailed description of the first of three research phases outlined herein. Designed to put in place a strategy for reviewing the program or case study profiled in the dissertation, this (pre-implementation) research was carried out from June to December of 1998, and includes the introduction of two main influences on my work at that time. In addition, Chapter 4 features the three primary findings and several secondary findings that characterize this phase of research. The key review questions and four recommendations that served as the basis for creating a review framework for AMPA are discussed, and my focus on encouraging a comprehensive partnering approach within AAFC by using two techniques lauded in the evaluation literature completes the chapter. That is, by situating the framework in its organizational context, and developing an implementation plan for the review, individual and organizational compliance with the review of the program was expected to be advanced.

⁶ Within AAFC, AMPA is referred to as a *program*, as are its three component programs. To avoid confusion over the use of the word *program* throughout the dissertation, AMPA is called a *program* and its three component parts – the Advance Payments Program (APP), Price Pooling Program (PPP), and Government Purchases Program (GPP) – are termed *sub-programs*.

To that end, research into the review framework for AMPA was conducted to assess its utility and this is described in the second part of the dissertation. Chapter 5 concerns program managers' follow-up assessment in November of 2000 of the framework and thus allows an empirical test of the strategy developed to review AMPA. That is, the findings from this (mid-implementation) phase of research serve as a "take-stock" function, and demonstrate which components of the implementation plan were completed two years after it was created. The data from this phase of research accentuate some of managers' rationale for not carrying out the entire plan, and the implications of these findings wrap up the chapter.

However, the final (*ad hoc*) analysis that begins the third part of my dissertation calls into question the initial assumption that the expectations of Parliamentarians for program performance information will be met. Chapter 6 showcases the very relevant subject of mandatory review clauses, the portion of the *Agricultural Marketing Programs Act* which specifies that an effective review report will be tabled in Parliament by April of 2002. Looking at this little-understood type of legislative directive adds to the dearth of academic and applied expertise in legislated reviews of government programs and in this way contributes significantly to the program evaluation literature. Based upon transcripts of House of Commons proceedings obtained after first and second research phases were conducted, the government's concern over trade retaliation is offered as the best explanation among four competing alternatives. This available evidence provides the first real glimpse into what was on the minds of Parliamentarians when AMPA was structured to include a

mandatory review clause. Namely, this dissertation identifies that AMPA was considered problematic trade-wise, and indicates that the government may have been motivated to insert a mandatory review clause in the program legislation as a delay tactic, or failing that, a mechanism to serve the agriculture and agri-food sector with notice that the program may be withdrawn. Given that Chapter 6 concludes all three phases of my research, it ends with a consideration of the strengths and limitations associated with the methods that were used.

The conclusions and the implications of my research are offered in Chapter 7. A gulf between the focus of evaluators on the needs of program managers or on federal government analysts attempting to ascertain the performance information demands of Parliamentarians is evident. Even when accounting for the best practices in the evaluation literature; well-intended attempts of practitioners to assist the government in preparing for program review; and prescriptions of the OAG, the dissertation reveals that a mandatory review clause is not enough to meet the high expectations for performance reporting to Parliament placed upon government departments and agencies by the federal Office of the Auditor General (OAG)⁷ and others, nor can it ensure that a meaningful review is reported to Parliament. The concisely-written clause only provides a clue to where researchers may begin to investigate Parliamentarians' needs for review-related information. Further, the relevance of such clauses is not widely known.

⁷ Throughout the dissertation the OAG is referenced. In all cases the federal office (cf. provincial Auditors General) is meant.

Notably, it would be unreasonable to expect AAFC personnel to have discovered Parliamentarians' concerns over trade in this case. Thus the ability of government departments and agencies to carry out good performance reporting on programs, even though the OAG deems this to be an essential part of modern democratic systems, is suspect. And while one could argue that Parliament or Cabinet members should be more specific in communicating their requirements for performance information, this suggestion runs headlong into the competing need for the confidentiality surrounding issues such as trade.

My results contribute not only to a keener awareness of both the facilitative and inhibitory influences and implementation challenges that face complex organizations in complying with mandatory review, they suggest a way for future review practitioners to address the significant gap between theory and practice present in the theory-heavy evaluation literature. Chapter 2 begins by profiling the process of enacting legislation which provides a necessary backdrop for the dissertation.

CHAPTER 2: BEST PRACTICES IN EVALUATION

In an era of both declining deference to authority and public institutions (Dobell, 1997; Putnam, 1997) and limited resources (Myers, 1992; Rossi & Freeman, 1993), issues of accountability and the justification of the spending of public funds concern the nation (Office of the Auditor General, 2000). Consequently, government bodies⁸ in North America who spend much of the available public funding are aware of the need for efficiency and effectiveness in administering the public purse (Jonas, 1999). This is particularly so with persistent reports of waste and inefficiency in government (Toffolon-Weiss, Bertrand, & Terrell, 1999) regularly appearing in the mainstream media.

Such concerns are not new, however, and in Canada can be traced back to the formation of two government bodies: The Treasury Board in 1867 and the Civil Service Commission in 1908. Legislation enacted many decades ago – the *Finance Act* of 1869, the *Civil Service Act* of 1918, and the *Consolidated Revenue and Audit Act* of 1931 – also illustrates early attention on the monitoring of government's ability to manage public funds (Government of Canada, 1990). Moving closer to the present, in his 1976 *Annual Report* the Auditor General of Canada expressed his consternation by stating:

I am concerned that Parliament – and indeed the [federal] government – has lost, or is close to losing effective control of the public purse (as cited in

⁸ This could be said for all levels of government. Most of my discussion of review and evaluation, however, is restricted to an analysis of the *Canadian federal* government. Readers should note that the experience in provincial and municipal levels of government, not to mention the private sector and other countries, can offer many parallels (e.g., Dobell & Zussman, 1981; Segsworth, 1992).

McQueen, 1992, p. 29).

Two decades later, the Treasury Board Secretariat (TBS) would continue to see reason to worry, declaring that “[Canada] no longer had the means to continue its frantic spending spree” (Treasury Board Secretariat, 1997). These issues, and others, concern practitioners of evaluation and review.

Before examining the relevant literature, however, the process of enacting legislation in government is introduced in this chapter as it serves as a base for some analysis that is carried out in the second part of the dissertation. Next in the chapter appears an exploration of evaluation, for although my dissertation provides an interdisciplinary⁹ case study into the dynamics of a review process, review is rooted in the program evaluation literature. After providing the definitions pertinent to my discussion¹⁰, how evaluation has been defined, conceptualized, and modified over time is chronicled. Given that a large part of appreciating evaluation is understanding its history in the Canadian federal government, emphasis is placed upon the policies and vision of TBS as the government’s so-called general manager.

⁹ Vickers (1998) writes that even though *interdisciplinary* work is more challenging to carry out than research housed in one discipline, it has much to offer in terms of avoiding some of the theoretical and methodological limitations of traditional, single-discipline lines of inquiry. The specific use of the term *interdisciplinary* here refers to the fact that from a public administration perspective the intention of Parliament in including a mandatory review clause within a particular program’s legislation is explored in the dissertation. A legal analysis of this obligation to review the program also is required. Finally, my knowledge of psychology and evaluation in investigating the perspective of persons striving for organizational improvement, and the barriers that they face in ensuring compliance with review, assisted me in my study.

¹⁰ A glossary of terms commonly used in program review and evaluation appears in Appendix 3.

The chapter continues by framing social program evaluation within a theoretical context. By relying mostly on contingency theorists'¹¹ views, and understanding some attributional processes in people's perceptions, how it is that the people who work for organizations are rational and seek to make improvements within their settings is considered. From there, the observations made by several commentators indicating that evaluation has not lived up to the high expectations demanded of it, despite numerous modifications in the field over time, are profiled. In particular, calls for the need to involve stakeholders to a larger extent in evaluative work; greater reliance on formative over summative evaluations; and more use of planning tools such as frameworks are documented. This focus on rational utilization evaluation – which includes the formation of partnerships, the use of proactive tools, and other techniques – is critical to the discussion. Essential, in short, has been the demand that evaluation meet its clients' needs.

The use of applied case studies is another, compatible approach to encourage compliance with evaluation and review. Such studies have high ecological validity and often reveal important insights into the complex environments within which they are situated. Yet with the exception of a few case studies that have been published over the last 10 years (i.e., Corbeil, 1992; Motuz, 1992; Framst, 1995), there is a dearth of practical and hands-on examples in an evaluation literature which leans heavily toward theory-related debate (e.g., Patton, 1990; Corbeil, 1992; Mark et al., 1999).

¹¹ Contingency theory cited here should not be confused with Fiedler's (1967) *contingency theory of leadership* (Alcock, Carment, & Sadava, 2000). The link between social psychology and evaluation appears later in the chapter.

Lastly, the chapter contains a description of the concept of review and gives the context for how it may be used to meet necessary, and even sometimes mandated, requirements for examining social programs. A distinction between the concepts of program evaluation and program review is drawn, and a detailed description of the latter, a relatively newly evolved function in government departments, completes the chapter. Based upon guidance in literature, a practical review framework was created (see Chapter 4) with program managers – who, by and large, are unfamiliar with evaluation and review – from the assumption that they would be in a better position to comply with, and follow through on, evaluative recommendations.

Compliance, in this case, was required as a result of a mandatory review clause¹² in the *Agricultural Marketing Programs Act*. Apart from a few passing references (Keyes, 2000; Tardi, 2000), such clauses have not been examined by academic commentators or public servants in any systematic or comprehensive fashion. Yet as argued in Chapters 6 and 7, legal inquiry in this area is essential in understanding the motivation of the persons who initiate reviews (i.e., Parliamentarians). In order to put that discussion into context, however, it is necessary for me to provide some background information on how government legislation is enacted.

The process of enacting legislation is the subject of the following section.

¹² Keyes (1992, 2000) writes of the international use of review clauses. Known as *sunset clauses*, review clauses were first introduced and used in the U.S., and are applied to all regulations on a regular basis in Australia. Dobell (2001), however, argues that these clauses connote program termination in Canada.

2.0 The Process of Enacting Legislation

As the Department of Justice (1995) indicates, “an *Act* is the most formal expression of the will of the State” and takes the form of a written law that is made by Parliament¹³. The Privy Council Office proclaimed in 1999 that “[t]he making of law is arguably the most important activity of government” (Privy Council Office, 1999a, p. 1).

In short, the power of legislation should not be minimized; Tardi (1992) writes:

In the conduct of public affairs, Parliament is the highest forum for the debate of public policy and political undertakings. It is the institution responsible for enacting the body of laws which guide the public life of the country. This function of Parliament is the cornerstone of constitutional democracy and is, therefore, Parliament’s most enduring accomplishment and legacy (p. 122).

But how do *Acts* come about? Each of the three parts of Parliament – The House of Commons, Her Majesty the Crown, and the Senate – must approve a bill before it becomes law (Department of Justice, 1995)¹⁴. Given that Parliament plays an essential part in making law – according to Tardi (1992), “the constitutionally mandated legislative process is the most significant task of Parliament” (p. 122) – a brief run-down of the process is required here.

¹³*Acts*, also known as *statutes*, can outline societal rules or provide the legal basis for some other type of government action.

¹⁴ Indeed, the Department of Justice refers to the Parliamentary approval process as *enactment*.

Both the legislative and executive branches of the government of Canada have a role in drafting, and ultimately enacting legislation. Legislation emerges when the government decides to put forward public policy. Several other possibilities for furthering the government's policy agenda exist such as making regulations, formulating and delivering programs' services, and developing and implementing agreements and guidelines (Privy Council Office, 1999a). In other words, the government has many alternatives through which to carry out its mandate (Department of Justice, 1995)¹⁵.

In the development of legislation, first Cabinet instructs the Department of Justice to prepare a bill. If the bill is approved by Cabinet, it becomes introduced into one of the Houses of Parliament (Tardi, 1992). Here the involvement of the executive branch of government is observed. The legislative branch becomes engaged once a piece of legislation is in Parliament, and following enactment, legislation receives royal assent which is the final step in the enactment of a bill by Parliament. As the Privy Council Office (1999a) reports, "[a]n Act has the force of law upon royal assent, unless it provides otherwise" (p. 11). At this stage, the adoption of any statutory instruments which are necessary in the legislation occurs.

Considerably more attention is devoted to the importance of legislation to my case study of review in Chapters 6 and 7. At this stage, however, other factors pertinent to understanding the dynamics of the review process are introduced. After providing some building blocks

¹⁵ Tardi (1992) points out that the legislative agenda of the government is based upon a number of sources including the government's *Speech from the Throne*, its budget, the platform of the political party that subsequently finds itself in power, and projects or programs posited by the public service bureaucracy.

essential to a general discussion of evaluation in which this term and *program* are formally defined, the following section again addresses the public service context, and the role of the Treasury Board in federal government evaluation is charted.

2.1 The Evolution of Evaluation in the Federal Government

Entire texts (e.g., Patton, 1990; Shadish et al., 1991; Rossi & Freeman, 1993) and numerous articles (e.g., Mark, Henry, & Julnes, 1999; Mertens, 1999; Whitehead & Avison, 1999; Cousins, Donohue, & Bloom, 1996) are devoted to describing various theories and types of evaluations. Not surprisingly, then, many definitions of evaluation abound¹⁶. Geva-May and Pal's (1999) contribution provides a worthy summary for the purpose of my dissertation:

Evaluation uses strict and objective social science research methods to assess, within various organizational structures ongoing programs, personnel, budgets, operating procedures, as well as to influence the adoption and the implementation of a policy or program (p. 11).

Although evaluations can be carried out on entire organizations, their procedures, and/or policies (Helgason, 1999), the most common unit of analysis for evaluators is a program¹⁷.

Framst (1995) defines a program as:

[A] set of resources used to carry out activities that bring about desired changes [which] in turn yield social, economic, and environmental

¹⁶ See Helgason (1999) for a compilation of definitions of evaluation, as well as examples of evaluation practices in Canada and six other countries.

¹⁷ The evolution of the term *program* in the Canadian federal government is charted later in the chapter.

improvements for society (p. 125).

According to Reid (1999), Rutman's (1984) influential definition of program evaluation shows a growing specificity in both the importance of available methods for conducting evaluations and the attention paid to various parts or components of programs (i.e., how they contribute to a program's results). Rutman sees evaluation as:

[T]he use of scientific methods to measure the implementation and outcomes of a program for decision-making purposes...evaluation draws attention to the significant structural elements of the program – program components, outputs, objectives, and effects (Reid, 1999, p. 92)

An extremely important consideration in evaluation is terminology (Segsworth, 1992). Specifically, newcomers to evaluation grapple with the new jargon that they must learn to understand all of a program's parts or components from an evaluative point of view. In addition to the terms touched upon by Rutman's (1984) definition, one can add inputs, activities, and impacts – also known as effects – to name a few. More generally, the use of the term *social program evaluation* is virtually interchangeable with *evaluation* in the literature, largely because it relies so heavily on commentators who address evaluation in the realm of publicly funded programs (e.g., government-administered and/or funded, not-for-profit initiatives) rather than programs offered by the private sector¹⁸.

¹⁸ Although, as Patton (1997) advises, “[t]he challenge of evaluation extends well beyond government-supported programming”, the collective history and expertise in the field of evaluation in Canada predominantly has been situated in government, particularly at the federal level (Reid, 1999, p. 86).

The definitions featured above point to three main elements important in considering research in evaluation; these are the:

- Basic unit of analysis for evaluators¹⁹;
- Scientific methods that they use; and
- Components that they consider within programs (i.e., programs' outputs and objectives, inputs and activities, and results whether they are called effects or impacts), as well as the inter-relationships between these components.

A fourth element to elucidate evaluation is the goal of making "improvements for society", taking the lead from Framst's (1995) definition of a program.

Moving specifically to a public sector context, and according to a former Comptroller General of Canada, "Program evaluation is one of [government's] key instruments for defining and measuring program performance" (Macdonald, 1991). Helgason's (1999) position supports Macdonald's view:

Evaluation is important in a results-oriented environment because it provides feedback on the efficiency, effectiveness and performance of public policies and can be critical to policy improvement and innovation. In essence, it contributes to accountable governance (p. 4).

Even though programs, particularly those in the federal government, have not always been evaluated *per se*, program evaluation – not yet known by this name – started out with a focus

¹⁹ For the purpose of my dissertation, this will be a program.

on fiscal auditing in the 1930s. By the 1960s, evaluation activities as they are understood today – the review and monitoring of programs' performance to improve accountability (i.e., effectiveness) – had become more widespread. By the late 1970s, "the evaluation function in the federal government was rapidly evolving and clearly mandated" (Müller-Clemm & Barnes, 1997, p. 66). In the 1980s, Dobell and Zussman (1981) observe that, "[e]valuation has become a part of the rhetoric in government" (p. 2). More recently in the 1990s, with continued pressure from the government's central agencies such as the TBS, and from the OAG acting as an officer of the legislature, it is fair to say that evaluation became even more widely known and used tool in the government. Evaluation was employed to the extent that "[q]uestions on the continued relevance, success and cost-effectiveness of programs are becoming an integral part of each [program] manager's ongoing responsibilities" (Macdonald, 1991). In 1993, the Auditor General of Canada underscored the sense developing in Canada that longer-term effects or societal-level results of government initiatives explicitly needed to be recognized and understood (Framst, 1995).

A comprehensive examination of evaluation relies on a historical view of how evaluation has developed in Canada over the last century²⁰, and the history of program evaluation in Canada is an interesting one in light of the many influences which have shaped evaluation activity over the past century. Thus it is necessary here to trace the evolution of evaluation in the Canadian federal government. By outlining the significant role played by the TBS as the

²⁰ Werner Müller-Clemm and I addressed this topic more extensively in an earlier work (Müller-Clemm & Barnes, 1997). The reader, too, can see Dobell (1999) and Reid (1999) for additional historical perspectives on program evaluation in Canada.

general manager of the federal government, a greater appreciation of evaluation's evolution, and of how it is used today, can be achieved.

Treasury Board's Influence on Program Evaluation in Canada

The TBS's support of evaluation in earnest has been tracked as beginning in the 1960s (see Dobell, 1999; Müller-Clemm & Barnes, 1997), and the role of the TBS over time has been as supporter and promoter of what Helgason (1999) terms an "evaluation culture" in the federal government. As well as managing the government's financial, personnel, and administrative responsibilities, the TBS examines and approves the proposed spending plans of government departments and reviews the development of approved programs (Treasury Board Secretariat, 1998). What follows is a focus is on the TBS's role in providing the policy framework in support of audit and evaluation for the federal government's administrative practices.

In 1969, the TBS published a document explicitly calling for the monitoring and assessment of government programs. As Sutherland (1990) points out, the TBS's not inconsequential support of evaluation at the time led to a clearer and more accepted use of the word *program*²¹, the term that informally had been used prior to then to identify both micro- and macro-activities within government. In the 1970s, a mandate for departmental evaluations to be reported to the TBS was in place, and the *Speech from the Throne* in 1978 promised

²¹ Programs were defined by the TBS in 1969 as "a collection of activities having the same objective or set of objectives" (Sutherland, 1990, p. 140). As depicted earlier in the chapter, more recent definitions of programs are not incompatible but expand the understanding of the concept of *program*.

a proposal for Parliament to review evaluations that were done on major governmental programs (Dobell & Zussman, 1981).

Just before the 1980s began, the TBS largely was concerned with the degree to which government departments were complying with TBS policies and "the extent to which performance data supplied with resource requirements [were] representative of program performance" (Treasury Board of Canada, 1976, p. 4). Measures of efficiency were to be related to resource use, and measures of effectiveness were to be related to program objectives. All of these measures were proposed to facilitate the planning, controlling, and evaluating of programs and the determination of program performance. Throughout the 1980s, major contributions to the field of evaluation by the TBS continued, with two important reference guides produced for evaluators. These were the *Principles for the Evaluation of Programs by Federal Departments and Agencies* and the *Guide on the Program Evaluation Function* published by TBS in 1981.

By the 1990s, the TBS would state that "the government's ultimate goal is to see that Canadian men and women – as citizens, clients, and taxpayers – get the maximum from the programs and services they need" (Treasury Board Secretariat, 1997). Following recent legislation that requires departments to produce annual performance reports, the TBS's own 1998 *Annual Report to Parliament* takes program evaluation one step further. This annual report underscores the federal government's priorities in fast-tracking the implementation

of results-based management²² for governmental initiatives. Currently, the four priorities for the federal government, according to the TBS, are:

- Attaining a greater capacity for results-based management across all departments and agencies;
- Increasing this capacity with multi-jurisdictional initiatives;
- Enhancing reporting on programs and the public's access to information on program performance to improve accountability; and
- Encouraging the federal policy community to use long-term and performance-based measurement perspectives (Treasury Board Secretariat, 1998).

Importantly, except for multi-jurisdictional initiatives, all four strategies explicitly fall within the jurisdiction of evaluation.

Not surprisingly, then, in helping departments and agencies to achieve these four strategies, the TBS encourages government to focus on programs' results; link results to outputs and costs; and strengthen the evaluation and review capacities in departments so that government is better able to measure the results of its programs, particularly programs' long-term social impacts (Treasury Board Secretariat, 1998). Put very simply, the emphasis in government increasingly is becoming not so much what government programs *do* (i.e., their activities),

²² Results-based management is management that focuses on programs' results – instead of their inputs, activities, or outputs – by demonstrating the societal impacts which come about because programs are in place. As characterized by Lenihan (1998), results-based management “encourages a[n organizational] culture of continuous learning, innovation, and improvement” (Dobell, 1999, p. 83). In terms of its significance, Dobell (1999) indicates that results-based management is one of two big themes in contemporary Canadian public administration.

but rather what they *achieve*; that is, both their short- and long-term outcomes and impacts (Dobell, 1999).

A strong representation of this focus on results-based management was the Government of Canada's introduction, via the TBS, of an Improved Reporting to Parliament Initiative in 1995 (Office of the Auditor General, 2000). The initiative continues in the present day, and was created in consultation with Parliamentarians, federal departments and agencies, various stakeholders, as well as the OAG²³. As the second phase of the Expenditure Management System (EMS)²⁴, it was directed at achieving better expenditure management and performance information for Parliamentarians, and introduced the *Estimates* documents which are comprised of three parts. Part I of the *Estimates* presents an overview of government spending; Part II highlights proposed appropriations; and Part III of the *Estimates* provides Parliamentarians with detailed expenditure plans for each federal department and agency. Given that my dissertation defines program performance more broadly than just fiscal management, it is this third part of the EMS that is most relevant to this discussion.

Part III of the *Estimates* is made up of two documents prepared by federal departments and

²³ A summary of the OAG's (2000) audit of results reporting of government departments and agencies appears in Chapter 7.

²⁴ The EMS existed before the Improved Reporting to Parliament Initiative, and came about as the TBS realized that an integrated approach to bringing together accountability information in the federal government was required. Revised in 1995 in the context of reducing Canada's deficit to 3% of Gross Domestic Product, the first phase of the EMS involved the introduction of business line plans. Business lines are a topic referred to again in Chapter 4.

agencies, and annually these are tabled in the House of Commons and referred to the appropriate standing committee. (There is a Standing Committee on Agriculture and Agri-Food, for instance.) The timing of the tabling of these two sets of documents is such that it lines up with the government's budget consultations in the fall, and the development of plans and priorities in the spring. That is, the *Departmental Performance Report* is based upon the performance of a department or agency for the fiscal year up to March 31st, and was conceived to report upon the results obtained in serving Canadians (as taxpayers and program stakeholders) by the particular organization. The second piece to Part III of the *Estimates* series, by contrast, is the *Report on Plans and Priorities* which is tabled every year in the spring in conjunction with Parts I and II of the *Estimates* (Office of the Auditor General, 2000). The *Report on Plans and Priorities* document establishes performance expectations and outlines the general direction that the Minister of the department or agency will take over the next three years. The relationship between these two documents is an obvious one: The *Report on Plans and Priorities* sets the strategic direction of an organization against which its results – outlined in the *Departmental Performance Report* – can be compared.

The preceding discussion demonstrates that the evaluation function in government certainly has grown and matured over the last few decades. A remaining question, however, concerns the extent to which the heady hopes for evaluation have been fulfilled in Canada. This is addressed in the next section, and the question re-surfaces later in the dissertation (i.e., Chapters 6 and 7). First, however, my attention turns to the increasingly reliance of utilization-focussed evaluation by beginning with a consideration of organizational

behaviour and rational evaluation utilization – both topics have large literatures unto themselves – my discussion is limited to contingency theory (for the former) and is premised upon the fact that an evaluation must meet the needs of its clients (for the latter).

2.2 The Movement Towards Utilization-Focused Evaluation

Earlier in the chapter, Framst's (1995) definition of a program was presented, and in describing evaluation his definition included the goal of eliciting societal improvements. Mertens's (1999) global description of evaluation also features this point: She writes, "[e]valuators...want people to use [their] findings for purposes of positive change" (p. 12). Upon reading that statement, one may ask the questions, "Who are these people whom evaluators want to influence?" and/or "How is it that positive change actually is achieved?". After looking at the "who" in evaluation, the "how", or the utilization, of evaluation is examined later in the section.

The Social Psychology of Organizational Behaviour: Contingency Theory

In essence, program evaluation is about people, whether it be the clients of a given program, program staff and managers, or decision makers who revisit the results of the program. The social psychology of individuals with respect to the functioning of a program and its review include interpersonal relationships, perceptions of others and self, personal biases, group processes, and/or commitment to a superordinate goal. Yet these areas have not been explored to any large degree in the evaluation literature. It may be said, however, that many commentators (e.g., Patton, 1990; Hudson, 1992; Love, 1992; Motuz, 1992) have situated

evaluation within an organizational context. Austin, Cox, Gottlieb, Hawkins, Kruzich, and Rauch (1982) sum up a common sentiment in the literature by stating that:

Evaluation is an attempt to enhance planning [in an organization]. It seeks to improve on the trial-and-error approach by assessing the impact of service programs *systematically* (p. 128, emphasis in original).

The trial-and-error approach to which Austin and his colleagues refer is decision making – including the option of maintaining the status quo – based upon the gut instincts of, or limited information available to, decision makers. Helgason (1999) and McQueen (1992) also see evaluation as being able to provide the data or evidence for organizational inertia or change by pointing out that the main objectives of evaluation are better decision making, as well as the improvement of accountability and resource allocation. Thus, an examination of the actors within an organizational setting sheds light on how change is sought after and the extent to which it is achieved.

A number of explanations are available to explicate how or why evaluators ply their craft in the settings within which they work. For example, Dobell and Zussman (1981) refer to the need for public servants to animate organizational transformations. Helgason (1999) indicates that “on a more general level the goal of evaluation may be defined as organizational learning” (p. 15). But apart from the contingency theory proposed by Albaek (1995, 1996) with the purpose of finding a “theoretical justification” or fit between evaluation and the psychology of organizational behaviour in promoting contingency theory,

it is possible only to speculate here on how social psychology influences the evaluation of programs²⁵.

At the center of Albaek's position is the notion that persons who make decisions for a given organization are motivated to locate and support initiatives for continual improvement. Contingency theory is rational in its orientation, in that its proponents postulate that organizations feature people who (rationally) strive to reach the organization's goals by looking for the most efficient means to do so. Yet research carried out by social psychologists in the last several decades reveals that individuals' thought processes are anything but rational. An illustration of this point is the actor-observer bias, a type of correspondence or attributional bias identified by social psychologists who examined how people think and perceive others in making sense of the world (see Watson, 1982). Briefly, the actor-observer bias demonstrates the tendency of a person to take credit for her successes and avoid blame for her failures. For instance, if an employee makes an error in his work, he is likely to attribute the mistake to *external* factors; these could be time pressures, unclear direction, and the like. However, if this employee observes a colleague making the same kind of a mistake, he will explain the error with reasons *internal* to his colleague: The colleague is unintelligent, does not have a good work ethic, etc.

²⁵ It may be said, though, that numerous other theorists have tried to explain evaluation in terms that have a psychological ring to them. For instance, Mark et al. (1999) refer to evaluation as "a form of assisted sensemaking" in organizations (p. 184); and Bellehumeur (1999) speaks of people's state of mind as influencing all of their (organizational) actions, as well as being the source of their own visions and perceptions of the organization.

The actor-observer bias leads nicely into a second, also unconscious, tendency in people's thinking that has been discovered by social psychologists, the belief in a just world (Lerner, 1977). In short, individuals tend to regard what befalls other people or groups of people as them getting what they deserve and deserving what they get. To demonstrate, if a program serving meals to infirm senior citizens in their homes gets canceled, their belief in a just world leads people to view the program cancellation as justified: It wasn't necessary and it was poorly delivered, are two possible attributions. In fact, other explanations are available. The program could have ended because funding was limited at the outset, or because of a change in priorities of the program administration.

Given that there is no social psychological theory or established view of the interdisciplinary field of evaluation, Albaek's (1995, 1996) contingency theory is the most comprehensive package available for considering the psychology of organizational behaviour in evaluation. Other evaluation theorists appear to share the tenets of contingency theory, as well. For instance, Mark et al. (1999) view evaluation's objective as "[s]ocial betterment, that is, the alleviation of social problems and the meeting of human needs". Bellehumeur (1999) states that an organization's employees need to be engaged as individuals, and as a group, in reviewing and integrating the processes required in order to satisfy their clients'²⁶ ever-changing and complex needs. Indeed, Bellehumeur sees organizations as dynamic and driven by their "internal energy" or the "collective effort" created by persons within

²⁶The word *client* is used to refer to the person or group who has commissioned the project being undertaken, whether it is an evaluation or a review. The potential limitations of this definition are revisited most prominently in Chapter 7.

organizations who have the potential to effect organizational change (p. 38).

Naturally, not all organizations are successful in achieving their goals, recognizing their problems, identifying their solutions, and/or actively implementing change. Some organizations will show superior results (e.g., high profits in the private sector and a high level of accountability and meeting the organization's objectives with expected results in the public sector), while others are mediocre in being accountable and fulfilling their goals, and still others fail entirely²⁷. Contingency theory accounts for the reality of disparate results in organizational achievement by relying on two basic assumptions, both of which depend upon flexibility. Firstly, there is no best way for an organization to perform; and secondly, due to the context-specific differences of various organizations, not all ways of organizing are equally effective (Galbraith, 1973). To be effective, organizations need to have a good fit between the way they function and the conditions upon which meeting or surpassing their goals rest. That is, if conditions internal or external to a given organization change, the organization must respond by adjusting its behaviour appropriately. This, in turn, will influence the organization's performance.

Contingency theory is complex enough to be compatible with the body of evaluation research such as that outlined in Patton (1978), Weiss (1977), and numerous other thinkers who helped shaped early scholarly work in the field of evaluation. Bolstered, no doubt, by

²⁷ A premise of contingency theory – that an organization must meet its goals to survive – obviously implies that organizations have explicit goals and that these must be well-known within organizations.

motivated decision makers eager to make necessary changes in their organization, evaluation has “traditionally been seen as an instrument to be used in a rational, analytical decision chronology to secure high and efficient goal attainment” (Weiss, 1972). By analyzing (i.e., evaluating) the results of programs over time, however, evaluators have not only expanded the number and type of methodologies that they use, they have participated in every stage of program planning, from conception to policy reassessment. Rational evaluation utilization, a recent move toward improving the practice of evaluation, implies that the real test of an evaluation is that it meets the needs of its clients.

But because there have been legal, economic, social, and political forces influencing organizations in both the private and public sectors in addition to the actions of individuals within an organization, the field of evaluation has emerged as more responsive to the needs of its various stakeholders. In introducing how evaluation presently is implemented by its practitioners, it is possible to consider whether or not evaluation has met the high expectations that have rested upon it in recent years.

Evaluation: Mandate Fulfilled?

With decades of support from the TBS, program evaluation undoubtedly has been a central force in defining departmental assessments of their programs in Canada. The evolution of the federal evaluation function was somewhat sporadic in its early stages (Müller-Clemm & Barnes, 1997), and it unfolded through a series of phases all of which hinged upon a growing need for evaluation as a necessary part of public accountability and also as an important

component of policy-making, planning, and budgeting (McQueen, 1992).

As Dobell and Zussman (1981) indicate, hopes for evaluation historically have been high, expressed in the form of increasing expectations for delegation and devolution of authority, improved management, alternative service delivery, and escalating scrutiny of governmental bodies by Parliament and the public. The authors opine that “[c]learly there has been no lack of good intention” (p. 3) on the part of practitioners of evaluation over the years. Yet despite the well-meaning actions of members of the evaluation community, the ability of evaluators to make a real difference in the real world in which they operate has been questioned, a reference to the heavy emphasis that evaluators have placed on theory-related debate as opposed to the application of theory (e.g., Patton, 1990; Corbeil, 1992; Mark et al., 1999). Indeed, in looking at the history of program evaluation in the Canadian federal government, an important question emerges: Has the evaluation function fulfilled its mandate? The answer to this question has, in many cases, been a “no” (Dobell, 1999; Müller-Clemm & Barnes, 1997). Commenting with an international perspective, Helgason (1999) goes so far as to say that “[t]he history of evaluation may be characterized as one of unfulfilled promises” (p. 9)²⁸.

As mentioned, the significance of such views, particularly as they relate to my case study of review, will become more apparent in Chapters 6 and 7 where the needs of the ultimate

²⁸ Werner Müller-Clemm and I (1997) also refer to this as a gap between “promise” versus “performance” in the evaluation of federal government programs.

clients of review and the lack of formal processes for evaluators to determine these needs are noted. At this stage, however, three relevant changes that have led to increased relevance and utility in the practice of evaluation are highlighted. All three can be characterized as rational evaluation utilization; they are:

- Encouraging stakeholder²⁹ involvement in evaluation³⁰;
- Favouring formative evaluations³¹; and
- Better planning evaluations by preparing evaluation frameworks.

Each of these points is considered more fully below.

Calls for Greater Stakeholder Involvement in Evaluation

Evaluators have been working hard within a relatively brief history *qua* evaluators in improving the techniques, tools, and methodology available to them. As Helgason (1999) observes:

[T]here is no single right way to conduct evaluations. The choice of methods will depend on several factors, including the objectives of [a particular] evaluation, the role of evaluation in a wider performance management framework, and institutional and political considerations (p. 4).

²⁹ Earlier in the chapter the term *clients* was defined. *Stakeholders* are different from *clients*. Rossi and Freeman (1993) define the term *stakeholders* more broadly as “[i]ndividuals or organizations directly or indirectly affected by the implementation and results of social programs” (p. 2).

³⁰ Empowerment evaluation is an evaluation model in which the evaluator relinquishes some control over the evaluation process to stakeholders, but for the purpose of clarity my dissertation is limited to discussions of evaluator-driven evaluation models.

³¹ A definition of what constitutes formative (cf. summative) evaluation appears in that section.

Traditionally, evaluators³² were asked by program managers or senior organizational managers to examine a program and would do so, subsequently make recommendations, and communicate those recommendations to their direct clients. If stakeholders or clients themselves were involved in the process, it was to read the recommendations and perhaps answer questions contained in a survey or interview. Mertens (1999) has voiced her concern that evaluators for too long have worked in splendid isolation from the very people (i.e., stakeholders) who not only have valuable information to offer the evaluator, but who also play a central role in ensuring that the evaluator's recommendations are implemented (Helgason, 1999).

Indeed, it is fair to say that supporters of a more collaborative approach between stakeholders and evaluators, in North America at least, are many in number (e.g., Motuz, 1992; Paquet, 1999; Toffolon-Weiss et al., 1999). However, upon closer examination, evaluators are not *doing* what they say they *should be doing* in involving their stakeholders in program evaluation practices. For instance, research conducted by Cousins et al. (1996) shows that, when asked, evaluators tend to favour more collaborative types of evaluation. Yet when probed on the evaluation design that they actually employ, evaluators respond with conventional approaches to evaluation³³.

A second major modification expressed relatively recently in the field of evaluation is a

³² Often these evaluators were external to the organization. The differences between internal and external evaluators are discussed later in the chapter.

³³ The results of the Cousins et al. (1996) study are re-introduced in Chapter 7.

move toward having evaluators play a more formative, rather than summative, role as practitioners in this field.

Formative versus Summative Evaluation

The distinction between formative and summative evaluation was made by Scriven in the 1970s (Shadish et al., 1991)³⁴. Of summative and formative types of evaluation, summative is the more traditional of the two, in that it was the first form of evaluation to establish itself as a field in its own right (i.e., separate from the discipline of social science while still employing the methods of social scientists). Summative evaluation is a *post hoc* practice, in that it takes place after a program has been in existence for some time, and generally occurs at the point of determining whether or not a given program will be continued. The decision may occur regardless of the stage of the program's evolution or implementation, and often is politically motivated. Indeed, the reputation of evaluators as bearers of bad news³⁵ may be traced to earlier times in which they were called upon to provide assessment or judgment on the relative merit or worth (read: cost effectiveness) of a program with little or no attention given to the program's life span or other contextual factors. This often resulted in an evaluation product that criticized or condemned the program as ineffective, not meeting

³⁴ Numerous commentators (e.g., Patton, 1990; Rossi & Freeman, 1993; Scriven, 1993; Helgason, 1999) discuss the differences between summative and formative evaluation.

³⁵ As a practitioner of evaluation for almost a decade, there is much anecdotal evidence for me to draw upon which supports the notion that evaluators can be viewed with fear, loathing, hostility, and/or anxiety by their clients. Interestingly, my observations are supported in the evaluation literature (see Mayne, 1992; Geva-May & Pal, 1999; Toffolon-Weiss, Bertrand, & Terrell, 1999; Dobell, 1999). Unfortunately – in my view – a number of evaluators whom I have met over the years are not convinced that such reactions are anything but an inevitable by-product of the services that evaluators provide, kind of a deterministic aspect of the reality faced by evaluators.

its objectives, and/or being too expensive for the results that it achieved. That is, decision makers wanted evaluators to provide the so-called objective evidence to support their pre-determined decision to terminate a program, and were not accepting of evidence that pointed contrarily to their (decision makers') predisposed positions.

In consulting the evaluation literature, formative evaluation has become the preferred alternative in contemporary evaluation. Important to emphasize here is that formative evaluation is an expansion of summative evaluation in that practitioners retain the ability to make summative judgments when such decisions are required. After describing summative evaluation below, the position that formative evaluation offers a more fulsome choice over summative evaluation is presented.

Formative evaluation, as its name implies, can start as soon a program begins in that evaluation-related activities are written in to how the program is developed and subsequently managed. In essence, formative evaluation provides a regular feedback function within a program (Whitehead & Avsion, 1999) because evaluators are able to check up on a program more frequently. That is, evaluators are not in a position of having to wait for their intervention to occur only once a program has been allowed to operate for a lengthy period of time and to become established. The practice of formative evaluation embodies the view that evaluation can occur at any stage of a program's life cycle (see Helgason, 1999), even at a program's inception, and that programs can be improved upon with help from evaluators on an ongoing basis. It has been suggested by Dobell (1999) that as evaluators:

[I]t is essential to involve managers and line personnel in the formulation and conduct of evaluations, and to treat the exercise as a formative aid to improvement rather than a summative retrospective judgment (p. 91).

One of the best examples of the commitment to formative, rather than summative, evaluation, is the proliferation of discussion papers (e.g., Laurendeau, 1999; Hopwood, 2000) on the topic of evaluation frameworks in recent years. Evaluation frameworks are the third type of rational evaluation utilization that are profiled in the following section.

Evaluation Frameworks

Germane to the move toward more formative, rather than summative, evaluations, the task of developing a framework³⁶ for evaluations of ongoing government initiatives was undertaken by the TBS three decades ago in the late 1960s. In 1976, the TBS presented government managers with an expanded version of their 1969 product – a general evaluation framework – which included performance measurement techniques that could be applied to programs³⁷. In 1983, a document put forward by the Office of the Comptroller General defined these frameworks as:

...[T]he process through which a (new) program's purpose, background and description are documented and, if need be, clarified. At the same time, it is

³⁶ Though beyond my scope to consider each separately, a variety of tools similar to evaluation frameworks appear in the literature such as evaluation strategies (Patton, 1990), needs assessments (Rossi & Freeman, 1993; Scriven, 1993) and evaluability assessments (e.g., Shadish et al., 1991; Corbeil, 1992).

³⁷ Performance measurement is addressed more comprehensively in Chapter 4.

determined what information must be collected in order to be able to conduct a useful evaluation of the program (as cited in Müller-Clemm & Barnes, 1997, p. 60).

Basically, such evaluation planning reflects a desire to ensure that the performance of a program can be well demonstrated in the future (e.g., Austin et al., 1982; Hudson, 1992; Motuz, 1992; Myers, 1992; Rossi & Freeman, 1993).

Evaluation frameworks³⁸ have been used in government as an *a priori* tool for evaluators, who until then, relied on *post hoc* practices (see Patton, 1990). Before evaluation frameworks became commonly used³⁹, evaluations tended to be undertaken without any preparatory work prior to the initiation of the evaluation research. This practice resulted in evaluators being asked to come to evaluative conclusions about a given program in order to provide recommendations for the program's improvement. That evaluators often were unable to do so was, in large part, due to a lack of necessary baseline program performance data on hand upon which to base their conclusions. An *a priori* evaluation framework is set up to avoid any such *post hoc* problems in at least three ways. It:

- Allows stakeholders to be brought in by the evaluator to reach agreement on a more accurate scoping of the evaluation study;

³⁸ Evaluation frameworks set the stage for subsequent evaluation of a given program. Interestingly, in the process of preparing a *framework* for the review of AMPA started with the assumption of carrying out an *evaluation* of AMPA. As the project developed, however, its scope was expanded to be more comprehensive and the name was changed to *review* framework. (To illustrate, Chapter 4 shows that an evaluation of the program is just one of many other parts of a review framework.)

³⁹ The extent of the use has not been quantified. However, recent indications from TBS is that there is a "great demand" for frameworks that meet the growing need for frameworks in the literature (Boudreault, 2000).

- Provides the evaluator with the opportunity to begin any advance fieldwork that can be conducted; and
- Saves time by acting as a mechanism for clarifying initial questions and areas of misunderstanding on the part of evaluators and/or program staff and managers.

Also, the elements of a program – its objectives, inputs, activities, outputs, and outcomes – can be depicted in a sequential fashion in a framework with a logic model to reach a common appreciation of a program’s basics even before the evaluation begins.

Not surprisingly, the use of frameworks was welcomed by practitioners in the field of evaluation. Experts, including Mertens and her colleagues (1994), “stress the importance of systematic and *early* evaluation [techniques] to determine if [program] activities are achieving results and are appropriately and effectively implemented” (Toffolon-Weiss et al., 1999, p. 336, emphasis added). As to the frequency of the use of frameworks in evaluation, Toffolon-Weiss et al. (1999) advise that they have “become [an] almost universal...means of monitoring and evaluating programs and initiatives” (p. 337) in U.S. government agencies. In contrast, it is possible to state that in Canada that the potential of evaluation frameworks has not been tapped. Dobell (1999) maintains that “evaluation frameworks [are] not readily embedded in the [federal government] bureaucracy” (p. 81).

A second consideration that takes into account the unfulfilled promise of evaluation outlined earlier in the chapter is whether or not the frameworks currently in use are the best tools available to practitioners. It is conceivable that, with the relatively new utilization of

frameworks in program evaluation, present practices could be improved based upon perceived flaws with existing choices.

From the calls for improvement resulting in best practices in the evaluation literature, a review framework for AMPA (see Chapter 4) was developed to focus on partnering, be explicitly situated in its organization, and contain a plan for its implementation. To fully appreciate the framework, in addition to the organizational dynamics (Chapter 5) that influenced it, it is critical for me to describe in greater detail the concept of review. This last section of the chapter, followed by a description of AMPA in Chapter 3, rounds out the background information upon which my dissertation is based.

2.3 Understanding the Concept of Review

In the federal government, there has been a natural broadening of evaluation in a number of departments with recent mergers between audit and evaluation functions into *review* functions⁴⁰. The evolution from audit and evaluation to review is not simply a bureaucratic linguistic exercise. Rather, it is based upon the recognized need within government departments to have a more efficient and effective – and it is hoped, a more transparent and accountable – function with which programs' performance may be reviewed. Consequently,

⁴⁰ In charting the history of audit in Canada – a task also undertaken by Hudson and Mayne (1992) – Reid (1999) endorses the merging. He concludes his article by saying that “audits and evaluations should be viewed as complementary, and not redundant, activities” (p. 97). Bellehumeur (1999) and McQueen (1982) promote an integration of the two, so as not to lose the benefits of each. Leeuw (1992) concurs: “[I]n my opinion, it will no longer be acceptable nor efficient to have a split-up between performance auditing and policy evaluation, or, put differently, between accountancy, public finance, budgeting and social and behavioural evaluation research” (Reid, 1999, p. 97).

by incorporating a multidisciplinary approach into their work, the ability of government departments to assess and report on the results of their programs potentially is enhanced. This is realized through a given department's increased capacity to report on resource use and clearly link resource use to its accomplishments in terms of overall results and the program's social impacts.

The practice of review ensures that a number of tools in the evaluator's toolkit are not discarded simply because the calls for reform in the practice of evaluation (e.g., Bellehumeur, 1999; Mertens, 1999; Paquet, 1999) have yet to be realized. For while it is more collective, less controls-oriented, and participative than auditing (e.g., Paquet, 1999, Bellehumeur, 1999), evaluation is a field with plenty of opportunity for improvements. Review may be viewed as an expansion of traditional evaluation: That is, evaluation becomes *one of many* options available to the practitioners of review (see Chapter 4).

Bellehumeur (1999) describes review in the following manner: It is dynamic, flexible, supported by proven methods, and is based upon principles of real participation among stakeholders. He more specifically characterizes review by writing:

While review borrows certain tools from both internal audit and program evaluation, it does not belong to either one. Born of a culture of cooperation, review joins together what bureaucracy has torn asunder: determination of clients' true needs; total quality at lowest cost; partnership between clients and employees who provide the [program] services; and dynamic

development of systems and processes that operate in a constant state of flux

(p. 37).

Bellehumeur goes further to state that review consists of three main aspects; namely, the “alignment of perceptions, continuous improvement and qualitative research methods” (p. 39).

Support for review has come from the TBS, as well. When Art Eggleton, then-President of the TBS, indicated the importance of reviewing government programs, he underscored a commitment that has been continued in a recent *TBS Annual Report* (Treasury Board Secretariat, 1998). Eggleton advises:

Review is no longer just an analysis of past projects and programs. The collection, analysis and use of performance information should be an integral part of federal management at all levels... I see [program] review as a set of methods for finding answers to crucial questions, such as how well are we doing, and could we do better? (Treasury Board Secretariat, 1995).

By profiling 80 different reports from various federal departments and agencies, the TBS’s 1998 annual report aims to “provide a comprehensive picture of the government’s results commitment to Canadians and its performance in delivering on these commitments – that is, what results they are getting for their tax dollar” (p. 1).

But how did current expectations for review arise? As alluded to earlier in this chapter, the present federal government review function has its roots firmly embedded first in audit and,

later, in program evaluation. Financial auditing certainly is a necessary function, but some commentators (see Dobell & Zussman, 1981) have called for a paradigm shift away from sole reliance on the "ex post power" of auditing to "ex ante authority" of program review (Paquet, 1999, p. 3). Too much focus on control mechanisms in a complex world, it has been argued, is not addressing the whole picture that needs to emerge for decision makers to better do their job, and for managers to be more accountable for what they achieve (and don't achieve). Reid (1999) synthesizes the history of auditing and evaluation, and proposes that the two – along with performance measurement and reporting results publicly – "can be integrated as a part of a management system that supports accountability and continuous improvement in either a public or private sector context" (p. 87). Müller-Clemm and Lywak (1999) advocate that *process assurance* be replaced with *results insurance*. The former refers to traditional practices that are compliance-focused and characterized by hierarchical thinking, not surprisingly at the expense of organizational flexibility.

One may ask why it is necessary to shift from evaluation to review, why not simply maintain the status quo and lobby for changes to evaluation? As Austin et al. (1982) recommend, when examining a program it is essential for practitioners to ensure that the "tools fit the problem and not the other way around". Geva-May and Pal (1999) state:

Evaluation has been charged in recent years with being narrow in scope and unrealistic ... irrelevant because its answers are not of immediate interest, and unfair because it adheres to its sponsors and does not provide the data to less powerful stakeholders as part of its accountability role (p. 11).

Additionally, a historical examination of evaluation also leads to the conclusion that numerous reforms have been written about in the literature but not implemented (see Cousins et al., 1996) or at least not to the extent that they should be (Dobell, 1999). It is only by changing how practitioners think when they approach the assessment of programs, that a more fulsome strategy for determining the impacts of social programming, management processes, and defining the flow of program inputs, activities, outputs, and outcomes will emerge in applied settings like the federal government.

Indeed, numerous other strategies (e.g., financial audits, risk analyses of programs or organizations, program monitoring / performance measurement) are available to collect the sort of program and results information that public sector managers require to make decisions about their programs. Paquet (1999) envisions a new notion of governance in which auditors and evaluators are transformed into “managerial partners and colleagues” (p. 1), and he has created a dichotomy to differentiate the old and new ways of examining programs. The old view is meant to describe more traditional audit or evaluation activities; the new view is review (see Table 1).

Table 1: A New View: Review

Aspects of a Program	<u>Old Way</u> Traditional Audit or Evaluation	<u>New Way</u> Review
Authority	In-charge auditor / evaluator	Partnerships with clients
Relations with Management	Antagonistic	Consultative
Findings	(Summative) "Gotcha"	(Formative) involvement
Staff	Technical in one discipline	Multi-disciplinary

Adapted from: Paquet (1999)

In order to work more closely with program managers and other stakeholders, review practitioners:

- View stakeholders as collaborators;
- Devise practical products tailored to clients' needs to enlist their assistance and enthusiasm; and
- Sustain their involvement and investment in review over time.

Next each of these key characteristics of review is considered.

Viewing Stakeholders as Collaborators

By directly addressing one of the gaps in the evaluation literature by employing Bellehumeur's (1999) description of review it can be seen that central to review is an explicit stakeholder focus. Matheson, Scanlan and Tanner (1998) report that "[f]or high quality decisions it is important that people [affected by an evaluation or a review report's findings]

are appropriately empowered” by being involved in the process (p. 2). Further, according to Mertens (1999), involving stakeholders allows a broader perspective in that it, “...counterbalanc[es] management biases” (p. 3). In light of Alback’s (1995, 1996) view, one should include organizational biases here, as well (cf. Motuz, 1992).

Indeed, on the topic of stakeholder involvement, Matheson et al. (1998) underscore the need for stakeholders of a program to be regularly apprised of program information, and stress that “[i]t is important that good information be available to [stakeholders]” about a given program (p. 2). Helgason (1999) agrees, arguing that practitioners engaged in activities related to evaluation, especially if they come from within an organization, need to focus on increasing their transparency and publicity by working with stakeholder groups⁴¹.

Practical Product Tailored to Clients’ Needs

A common element in basic descriptions of evaluation (e.g., Austin et. al, 1982; Helgason, 1999) makes the distinction between evaluations conducted by persons inside the organization – “in house” or internal evaluators – compared to external evaluators, who usually are consultants. Although there are advantages and disadvantages to both types of

⁴¹ The guidance that can be taken from the literature can be added to earlier examples of AAFC having successfully worked with the agriculture and agri-food sector. As described in the next chapter, the Branch of AAFC that was responsible for managing AMPA at the time that my pre-implementation research was carried out was able to gain valuable feedback from program stakeholders in 1995-1996, when it held nation-wide consultations on the five programs that preceded AMPA. The input received may have been a major factor in why AMPA was consolidated into one program and is offered in its present state. Interestingly, trade was not a focal point in these consultations, supporting my contention that despite practitioners best intentions, the necessary information from the review process from Parliamentarians’ standpoint will not be provided (see Chapter 7).

evaluators (see Austin et al., 1981; Patton, 1990; Motuz, 1992), Helgason (1999) warns that, “external evaluators may have less understanding of the substance and the political and administrative culture of the evaluated organisation” (p. 31). Patton (1990), too, refers to ultimate implementation of planning activities (e.g., frameworks) as being “adapt[ed] to local conditions [and] organizational dynamics” (p. 105) in order to best ensure that the products of the planning are utilized. Austin et al. (1982) state that “[t]he active support and leadership of the agency director [management] is needed in order to develop and maintain staff interest and commitment” (p. 7).

Viewed from a methodological vantage point, Patton (1990) warns that not involving stakeholders may have disastrous consequences; he reports, “[d]istance [on the part of the practitioner] does not guarantee objectivity; it merely guarantees distance” (p. 480). Although Albaek (1996) in advocating contingency theory, and Patton in promoting his ever-practical perspective of evaluation, may be more realistic than more theoretical evaluators in accurately portraying the complex nature of an organization and what occurs within it, exactly how to go about getting that support, leadership, and buy-in in complex, real-world settings is the critical question.

As noted earlier in the chapter, a substantial part of the evaluation literature can be said to be devoted to a discussion of rational evaluation utilization, or utilization-focussed

evaluation, put forward by Patton (1978)⁴². This approach to evaluation can be summed up by Austin et. al's admonishment; namely, that "[t]he key to successful use of evaluation is that it must be *designed to be used*" (p. 12, emphasis in original). Since Patton's utilization-focussed evaluation arrived in the evaluation community, there have been related variants proposed⁴³. All of the commentators associate evaluation with usefulness, feasibility, and an understanding of the program context to increase the chance that the work of the evaluator will be utilized and implemented.

One of the driving forces behind expanding review to include evaluation is that without a *practical* method for program managers to use, there is little chance that a comprehensive review would be carried out. That is, program managers are busy enough meeting the daily challenges of managing their programs without having to decipher the many "how to's" contained within a traditional evaluation report. However, and as explained earlier in the chapter, a number of evaluators have supported planning exercises, such as the creation of frameworks, for members of the evaluation community. Review provides the opportunity for its practitioners to follow the same type of rigorous planning, and to design a review product it in such a way that it is tailored to its clients to ensure that the product gets used as a tool to prepare for a subsequent program review. An implementation plan (see Austin et al., 1982; Helgason, 1999) that includes estimates of the financial and time commitment

⁴² Myers (1992), by contrast, credits Weiss with introducing the utilization-focused evaluation to the literature in 1966.

⁴³ Shadish et al. (1991) focus their text on utility, or the use of evaluation; Rossi and Freeman (1993) advocate responsive evaluation; Julnes, Mark and Henry (1998) discuss realistic evaluation; and Helgason (1999) summarizes pragmatic evaluation.

required for the review, as well as delineates the shared responsibilities for each review strategy contained within the plan, could be one of these tools⁴⁴. As Austin et. al (1982) inform their readers, “[i]mplementation of decisions on the basis of... findings must consider the effect of the passage of time on a program” (p. 31). Helgason (1999) is more specific, citing the importance of designing projects to suit the subject at hand, incorporating existing information, highlighting the resources available to the practitioner, and delineating the manner in which findings will be used.

In short, the message appears to be that adding the responsibility of making review more user-friendly to its most direct organizational clients – program staff, managers, and AAFC senior managers – will lead to a better achievement in accountability of public funds. And the more information which is provided to these clients that is explicitly relevant to them, the more expedient the review process will be for all involved; more importantly, the greater the likelihood that the review of the program will be carried out due to the consequent increase in stakeholder buy-in. Put simply, Bellehumeur (1999), who considers the topic of review extensively in his article, guides his readers “to ensure project follow-up” (p. 42).

A related consideration in making a review product meaningful to the most direct users of

⁴⁴ An implementation plan was agreed to by AMPA’s managers in December of 1998 so that they would be able to cost out and see estimated time-lines for the review strategies contained within the framework. The plan figures prominently in Chapters 4 and 5, and can be seen first in Figure 5 and later in Figure 6 where the plan revised in November of 2000.

the framework, is addressed by Albaek (1996) who writes:

Exactly because evaluation research can involve theoretically and methodologically sophisticated analysis, it can be a foreign and relatively “artificial” instrument compared to the multitude of alternative feedback mechanisms utilized in [the current practice of program review] (p. 7).

It is essential that review products reflect the lessons provided by evaluators; namely, that the products of review not be too “sophisticated” or “artificial”, compromising the likelihood of client utilization. By situating a review framework within a context larger than the program being reviewed, the idea is that the framework becomes more real and meaningful to the clients who use it⁴⁵. Finally, Toffolon-Weiss et al. (1999) note that a “sense of ownership” (p. 354) in the clients’ product helps to demystify evaluation and other review-related processes. Before presenting some background information on AMPA to appreciate the context of this case study of review, the subject of *sustaining* client involvement once it has been engaged is entertained.

Sustaining Client Involvement

In writing about program evaluation, Austin et. al (1982) advise:

[It] need not be overly complex to be useful, that it does not necessarily

⁴⁵To capitalize on the fact that I had close and detailed knowledge about AAFC, I decided that AMPA’s management and senior departmental managers would benefit from a linkage made from the program to the department’s business line activities in the review framework. (This linkage is depicted in Figure 4 and discussed in greater detail in Chapter 4.) By situating AMPA in a context that is meaningful to the most direct clients of the review framework, the literature suggested that the chances of the framework being utilized to meet the mandated review requirement were increased given that the “larger picture” was summarized in an easy to visualize manner for senior managers. The program detail, too, is captured sufficiently to allow AMPA’s management team to identify with, and utilize, their tool.

involve an elaborate methodology. What *is* important is the level of involvement of staff in design and implementation and that the thrust for...change comes from within the agency [organizational unit] itself (pp. 20-21, emphasis in original).

Further, Mertens astutely dictates that “[t]he challenge [for evaluators] is to approach evaluation in a way that builds in a greater likelihood of utilization” (p. 11). Moreover, Helgason (1999) intimates that “interest in evaluation as a management tool is increasing” (p. 9). One of the aspects of review is the emphasis placed upon client participation (e.g., Bellehumeur, 1999). In moving away from command and control models offered by traditional audit and evaluation, review embraces a “philosophy of participation and flexibility for the achievement of concrete results” (p. 37).

A mechanism for encouraging, and then sustaining direct client involvement in review, is performance measurement. The practice of “doing government well” by monitoring performance on a regular basis is not a new one. In Canada, government departments were mandated by 1980 to improve and increase their evaluation function – for internal management purposes as well as for resource allocation -- with the goal that all departments would be “using adequate and reliable means, wherever feasible, for performance measurement” (Treasury Board of Canada, 1976, p. 5). What is new, by contrast, is the active, ongoing involvement of program managers in performance measurement processes⁴⁶.

⁴⁶ Evaluators such as Patton (1990), Shadish et al. (1991), Nutter (1992), Scriven (1993) and Dobell (1999) have argued that performance measurement has been something that evaluators, not their clients, engage in (cf. Rossi & Freeman, 1993).

As an example, rather than telling a program's managers from the standpoint as the expert evaluator what they need to know to best track their performance, serving as a facilitator of managers' discussion of performance measurement achieves at least two benefits. It allows the managers to develop the measures themselves all the while learning more about performance measurement, and it subsequently increases their stake in those (self-generated) measures. Thus, an important part of sustaining the involvement of program managers is the facilitative role that the review practitioner takes.

In the spirit of greater involvement and participation advocated by review's proponents, review posits performance measurement as the responsibility of the program's management and staff; review practitioners assist, educate, and facilitate a process wherein their direct clients develop performance measures and regularly monitor them. Indeed, it was just after the Office of the Auditor General of Canada (1998) discussed the need to gather appropriate performance information in its audit of the Advance Payments Program (APP), one of AMPA's three sub-programs, that it recommended to AAFC that it "...develop a *review* framework and identify the data and other information needed to examine the program's effectiveness in the five-year review" (p. 11-23, emphasis added)⁴⁷.

With the process of monitoring of a program's performance on an ongoing basis while encouraging dialogue among a group composed of clients and the review practitioner,

⁴⁷ As noted in Chapter 5, two of the managers interviewed in the second or mid-implementation research phase of the dissertation made reference to the review framework for AMPA assisting them with providing ongoing evidence on program performance to the OAG.

Bellehumeur (1999) points out the opportunity for mutual learning to occur. The practitioners of a review learn more about the program each time, and the program staff and managers further are engaged in the review activities. Bellehumeur puts almost a utopian faith in the ability of this type of synergy to shift paradigms and transform government. Other commentators, such as Framst (1995), refer to positive “carry-over” effects of incorporating evaluation or review into the day-to-day activities of program staff and managers: By providing staff and managers of a program with a structure for thinking critically about their initiatives, they bring their awareness, knowledge, and experience of evaluation and review to other areas of their work. A greater chance at implementation is believed to result from framework development which engage key stakeholders. As Guba and Lincoln (1981) propose (see Patton, 1990), the usefulness of evaluation is central, and that at the level of stakeholder engagement can be determined by the extent to which recommendations are implemented (cf. Scriven, 1993).

The three characteristics of review outlined above (i.e., viewing stakeholders as collaborators, devising practical products tailored to direct clients’ needs to enlist their assistance and enthusiasm, and sustaining their involvement and investment in review over time) all were posited to allow for co-operative partnerships with program managers and staff and guided the development of the review framework methodology featured in Chapter 4 of this dissertation.

My case study of review, applied to a real-world setting and thereby high on ecological

validity, was designed to assist AAFC in complying with a mandatory review. Subsequently it was tested using implementation at two years as the criterion for its success (see Chapter 5). However, it becomes clear in Chapter 6 that the government's real intention for mandating a review of AMPA could not have been discovered using such methodology, however innovative.

Before turning to the framework itself, its implementation, and a legal analysis of mandated review, it is important to provide more information about AMPA, the program upon which my case study is based. Program information is presented in the next chapter.

CHAPTER 3: PROGRAM INFORMATION

This chapter contains a description of AMPA, the program governed by the *Agricultural Marketing Programs Act*. AMPA's background, including the programs and legislation that preceded it, and the rationale behind consolidating its pre-existing programs into one *Act*, are featured. The chapter ends with information on the three sub-programs that make up AMPA.

3.0 AMPA: Background

According to Mertens (1999), “[o]ne of the first challenges that an evaluator faces in a new project is to discover the program theory that is operating” (p. 6). Austin et. al (1982) refer to the incredible amount of time and effort that it takes, in many instances, to clarify a program's goals and objectives. A number of commentators (e.g., Mayne & Hudson, 1992; Corbeil, 1992; Framst, 1995; Whitehead & Avison, 1999) have pointed to the benefits of developing a representation of a program's inter-relationships or logic from the point of view of its performance. So-called logic models depict the elements of a program into an integrated whole, as well as link the theory of a program with its implementation, thus assisting in showing the flow from inputs and activities to outcomes / results (Whitehead & Avison, 1999). Logic models are the “general anatomy” of the components of a program and how they all work (see Framst, 1995 who also happens to focus specifically on agricultural programs).

Whitehead and Avison (1999) caution that logic models are not mere flowcharts of activities; instead, they are visual displays that plan the expected flow of influences within a program

that produce change. Framst (1995) concurs, observing that logic models of programs, used since the 1960s, “have afforded a method of schematically presenting program objectives and the underlying cause-effect relationships between program activities and objectives” (p. 123). Adapted from Review Branch (1998), a preliminary logic model in consultation with AMPA’s managers was developed. The logic model for AMPA illustrates the program’s objective, activities, outputs, and impacts, and it appears in Figure 1.

As shown in the figure, the program objective or the stated purpose of the program – as per the *Agricultural Marketing Programs Act* – is to “provide support for the marketing of agricultural products” (at Summary). AMPA⁴⁸ may be described as a marketing program offered to the agriculture and agri-food sector by AAFC, in co-operation with the Canadian Wheat Board (CWB) and various producer organizations. An important consideration is that while AAFC manages and administers the program, the CWB and producer organizations deliver the program to producers⁴⁹ who are the clients of the program.

The *Agricultural Marketing Programs Act* received royal assent by Parliament in April of 1997⁵⁰, and represents a consolidation of four previous pieces of legislation and one *ad hoc*

⁴⁸ Specific parameters of the program such as crop and producer eligibility are outlined in the *Act*.

⁴⁹ Consistent with the nomenclature of the federal government and the sector, the term *producers* rather than *farmers* is used in the dissertation. Producer organizations are groups that represent producers of common commodities, and the CWB is the marketing agency for Western Canadian producers who grow wheat and barley (Canadian Wheat Board, 1998).

⁵⁰ In Chapter 2, the process of enacting legislation within the federal government is briefly described.

initiative⁵¹. The marketing tools offered by AAFC to the agriculture and agri-food sector prior to AMPA were the:

- *Agricultural Products Co-operative Marketing Act (APCMA);*
- *Prairie Grain Advance Payments Act (PGAPA);*
- *Advance Payments for Crops Act (APCA);*
- *Agricultural Products Board Act (APBA);* and
- Cash Flow Enhancement Program (CFEP)⁵².

The five were initiatives designed to encourage the orderly marketing of agriculture and agri-food products, and were based upon the premise that by providing a marketing tool – whether it be a cash advance⁵³, initial payment funded by price guarantees, or having the government purchase farm products at harvest time – farm products could be sold later in the crop year to result in increased revenues to producers⁵⁴. Additional information on each of the initiatives that were replaced by AMPA is summarized next.

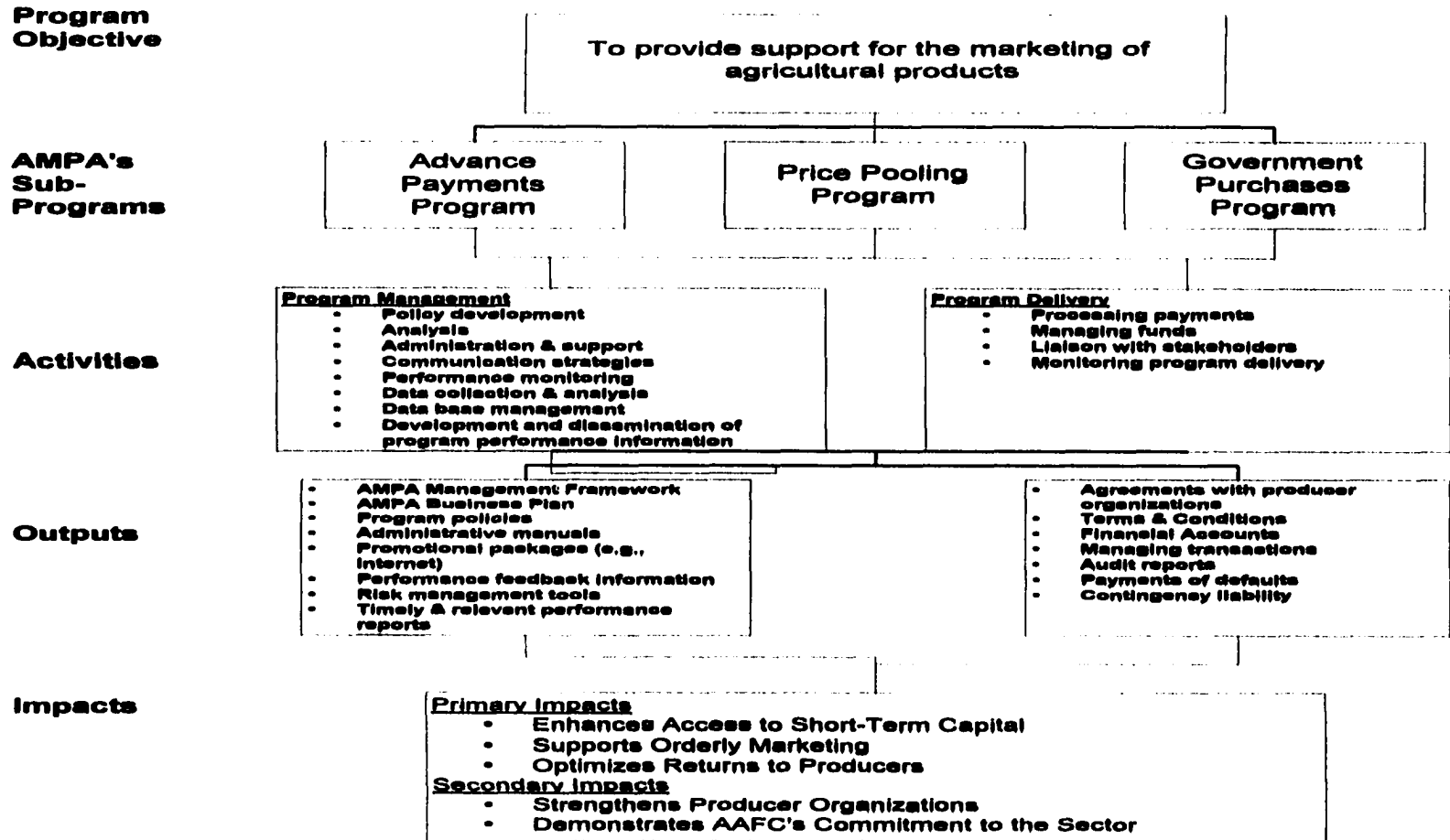
⁵¹ The evolution of related programs is by no means over. As noted in Chapter 5, the federal government announced a Spring Credit Advance Program in 2000 to offer interest-free loan guarantees of up to \$20,000 to producers. This amount was raised to \$50,000 in March of 2001.

⁵² To be implemented, the Cash Flow Enhancement Program required annual approval by Cabinet, thus use of the term *ad hoc initiative*.

⁵³ As is common in the agriculture and agri-food sector, the terms *loan guarantee* and *cash advance* are used interchangeably throughout the dissertation.

⁵⁴ Depressed prices for commodities exist at harvest time because producers “dump” their crops on the marketplace once their crops are harvested. The abundance of available commodities effectively lowers the prices paid to producers for the commodities with prices received by producers in direct relation to the proximity to harvest.

Figure 1: AMPA Logic Model



Agricultural Products Co-operative Marketing Act

The APCMA dates back to 1939 and originally was put in place to assist producers who wished to process and market their products in a co-operative manner. The legislation for the program was passed after the *Canadian Wheat Board Act*, and covered all regions of Canada and all types of crop that were not eligible under the *Canadian Wheat Board Act*. Additionally, the APCMA authorized the Minister of what is now known as AAFC to provide a price guarantee to producer organizations who pooled product and who offered their constituent producers with equitable returns. The producer organizations then used the price guarantees to obtain financing which helped them to fund initial payments to producers upon product delivery, as well as to fund the processing, storage, and selling costs incurred by the organization.

Prairie Grain Advance Payments Act

The PGAPA was introduced in 1957, and its corresponding program assisted producers who grew crops eligible under the *Canadian Wheat Board Act* by providing them with cash flow at the time of harvest. The original rationale of the PGAPA was based upon the limited capacity of transportation and storage facilities in the prairie provinces, and the need among producers for short-term capital to alleviate the financial pressures caused by this limited capacity. The PGAPA program was delivered to producers through the CWB and grain elevator companies, and provided producers with cash advances at harvest which were repaid as grain delivery quotas were called and the crop was delivered to the respective elevator company for storage.

Advance Payments for Crops Act

The APCA was introduced in 1977, and while similar to the PGAPA – its purpose also was to encourage orderly marketing by helping producers to avoid harvest-time selling pressures and concomitant financial constraints – this initiative addressed a much broader spectrum of crops. The APCA also stimulated the establishment of viable producer organizations, as it provided a vehicle and incentive for producers outside of the prairies to organize under a common umbrella.

Cash Flow Enhancement Program

Cash advances under both the PGAPA and APCA were interest-free until 1989. Interest-free advances appeared to be a popular program feature to the agriculture and agri-food sector. Indeed, when the federal government included in its 1989 budget the elimination of the interest-free aspect of the PGAPA and APCA⁵⁵ among various other reductions in government spending, a significantly reduced demand for the two programs resulted. In response, AAFC introduced the CFEP during the 1990 crop year to reinstate the interest-free provision for the first \$50,000 of a cash advance. The CFEP was approved each year on an *ad hoc* basis until the interest-free feature became a permanent provision under AMPA in 1997.

⁵⁵ Cash advances still were available under the APCA and PGAPA, but the federal government now charged producers interest.

Agricultural Products Board Act

Under the mandate of the APBA, AAFC – via an appointed Agricultural Products Board – could buy, sell, or import agriculture and agri-food products, as well as administer food contracts and other operations. The purpose of the program was to provide producers with stable incomes and ensure the availability of a ready supply of Canadian agriculture and agri-food products.

Some of the reasons behind changing these initiatives that ultimately led to the enactment of the *Agricultural Marketing Programs Act* are explained in the next section.

3.1 AMPA: Rationale for Consolidation of Existing Acts

The rationale for changing the structure of AMPA's precursor programs by enacting the *Agricultural Marketing Programs Act* in 1997 came from recommendations that resulted from studies of the five pre-existing programs outlined above (see Agriculture Canada, 1993; Cash Advance Working Group, 1994). Additionally, the Market and Industry Services Branch (MISB) of AAFC – the AAFC branch responsible for managing AMPA⁵⁶ – held nation-wide consultations on the APCMA, PGAPA, APCA and APBA in 1995 and 1996, with the purpose of getting feedback from the agriculture and agri-food sector on how to best offer these programs to the sector. In this consultative process, over 80 producer organizations, as well as the CWB, provincial government representatives, and individual

⁵⁶ As reported in Chapter 5, AMPA had been moved to a new Branch within AAFC, the Farm Financial Programs Branch two years after my dissertation research was initiated.

producers provided their input to the MISB. The consultations raised a number of issues⁵⁷, including:

- Perceived differences between the PGAPA and APCA – such as the eligibility of farm-fed grain and seed, rollover of advances from one year to the next, and charging of administration fees – were said to lead to confusion among producers and strong feelings of inequitable treatment depending upon program eligibility.
- While most agriculture and agri-food industry representatives were comfortable with the maximum level of cash advances available⁵⁸, horticultural producers felt that they should be allowed a higher maximum than other producers, and that the level should be based upon the value of the crop produced. (The special needs of the horticultural sector also were mentioned, given the perishable nature of their crops).
- Requests to broaden the list of eligible crops to include ranched fur and honey crops were made by interested parties.
- Penalties for defaulting on PGAPA cash advances were believed to be too weak. Some potential benefits of AAFC synthesizing the numerous activities under one initiative, instead of five, were noted during the consultations. Four prospective benefits mentioned were:

1) The provision of a common legislative base for agriculture and agri-food

⁵⁷ The significance of AMPA and its potential impact on trade – thoroughly absent in the 1995-1996 consultations – figures prominently in Chapters 6 and 7.

⁵⁸ The maximum cash advance available to producers was – and under the APP (one of AMPA's three sub-programs), still is – \$250,000, though only \$50,000 of it is provided interest-free. For example, if a producer were to take out a cash advance of \$75,000, interest charges would be levied on \$25,000 of the advance.

marketing programs. One of the key objectives of the initiatives that preceded AMPA was to provide producers with access to short-term capital, allowing them to delay the marketing of their products over a longer period of time. This prevented markets, as well as transportation systems in the prairie provinces, from being flooded at the time of harvesting crops.

2) The reduction of crop and regional inequalities. Prior to AMPA, there were several perceived inequities between the APCA and PGAPA cash advance initiatives. Most prominently, the PGAPA had produced very high default rates compared to the APCA.

3) The reduction of inconsistencies in administrating multiple initiatives. Before AMPA, the exact circumstances and conditions under which producers could access or qualify for cash advances under different programs were not clear to a number of stakeholders in the agriculture and agri-food sector. Inconsistencies and lack of clarity across initiatives resulted in confusion, overlap, and the perception of inequity for some producers and producer organizations.

4) The reduction of overall costs. It is reasonable to expect that consolidating several initiatives into one program and *Act* would result in an increase in administrative efficiency, and that an overall reduction in program costs could be realized.

Because AMPA was conceptualized and implemented to be an improvement over earlier initiatives, it is necessary that any review of the program investigates whether or not the anticipated improvements have occurred. It also is important to understand how AMPA's three sub-programs contribute to assisting the achievement of the objectives outlined in the *Agricultural Marketing Programs Act*. AMPA's sub-programs, as specified in the *Act*, are the subject of the following section.

3.2 AMPA's Three Sub-Programs

The three sub-programs of AMPA are the Advance Payments Program (APP), Price Pooling Program (PPP), and Government Purchases Program (GPP). A brief description of the purpose of each of these sub-programs, which includes some of their more important characteristics, and recent information on their uptake (i.e., current participation levels), follows.

Advance Payments Program

The purpose of the APP is to improve producers' marketing of eligible crops. This sub-program of AMPA provides cash advances of up to \$250,000 to producers (with the first \$50,000 of that being interest-free) to store their crops after harvest and thereby allows them to market their crops later in the season when market conditions result in better prices.

In effect, producer organizations administer the APP on behalf of the federal government. Through an agreement with AAFC, which provides a loan guarantee, the CWB and various

producer organizations are able to borrow from financial institutions in order to make cash advance payments to producers. The advance rate permit is up to approximately 50% of the price producers are expected to get for the volume of the crop that they have in storage. Producers repay their advances to the CWB or a producer organization as the crop is sold and at the same rate per unit as the advance was issued. The CWB or producer organization responsible then repays the loan to the financial institution. In the APP's first year of operation (1997-98), 45 loan guarantee applications representing approximately 37,000 producers and worth \$770 million were approved (Agriculture and Agri-Food Canada, 1998).

Price Pooling Program

The PPP is a market development sub-program of AMPA designed to assist and encourage co-operative marketing of agriculture and agri-food crops (including processed products), and to provide equal returns across time to producers for products of like grade and quality. The sub-program provides a price guarantee to marketing organizations which protects them against unanticipated declines in the market price of products, and assists marketing agencies in obtaining better financing rates. The financing is used to make initial payments to producers and to cover processing, storage, and selling costs of the marketing organization.

Under the PPP, producer organizations are required to complete a marketing plan which describes the markets that they will service and how the marketing plan will be implemented. The administrative capability and the financial means to implement marketing plans on the part of producer organizations also must be demonstrated for applications to be considered

complete. With a successful application for PPP participation, a producer organization calculates the average wholesale selling price for each crop grade or variety when all the product is sold out of the pool. If the calculated value is less than the price guarantee, the PPP allows for payment of the shortfall by AAFC. Profits, by contrast, are retained by the pool for future use or are distributed to producers according to the quality or grade of the produce that they delivered to the pool. In 1997-98 crop year, 21,025 producers received price guarantees, negotiated by 5 marketing agencies, which totalled \$161 million (Agriculture and Agri-Food Canada, 1998).

Government Purchases Program

Under the GPP, the Minister of AAFC is provided with the authority to purchase and/or sell agriculture and agri-food products. This authority would be used in the event of unusual market conditions: By intervening in the market, the Minister is able to achieve some degree of market stability. Before the Minister exercises the authority outlined in the GPP, financing for the action must be secured from the TBS. Since the *Agricultural Marketing Programs Act* has been passed, the Minister has not used this authority; thus the GPP is not a sub-program that is offered to the sector on an ongoing basis.

Now that some of the history behind AMPA has been traced, and its three sub-programs have been described, the next chapter chronicles the pre-implementation research phase of my dissertation. On top of introducing my data collection, analysis, and findings for this phase of research, the recommendations that resulted from the process of developing a review

framework for AMPA are reported. Completing Chapter 4 is commentary that stresses the importance of ensuring utilization of the framework by fostering a comprehensive partnering approach between evaluators and their most direct set of clients (i.e., program managers and staff; AAFC senior managers; and program clients such as the CWB, producer organizations, and producers themselves). This type of approach was developed to ensure better compliance with the mandated review of AMPA than if a review framework had not been prepared.

CHAPTER 4: CREATING A REVIEW FRAMEWORK FOR A MAJOR FEDERAL GOVERNMENT PROGRAM

The purpose of my first or pre-implementation data collection and analysis phase was to develop a strategy for review that could be empirically tested by a second or mid-implementation research phase (see Chapter 5). There were, however, a few preliminary factors that influenced my approach, and this chapter begins with a brief explanation of these factors. In creating a review framework for AMPA – the result of this first phase of research – two data collection techniques (i.e., firstly conducting an extensive document and file review and secondly interviewing persons familiar with the program and/or with its sub-programs) were relied upon. These techniques are described in the chapter.

After profiling my pre-implementation research findings, the process of creating the key review questions and the recommendations that formed the basis of the framework for AMPA is introduced. After reviewing this first set of research findings, a method described by both Austin et al. (1982) and Corbeil (1992) was utilized in order to sum up the pre-implementation results. The method involved creating review questions for the program to allow the construction of a review framework⁵⁹ for how important issues would be addressed in the review of AMPA, legislated to occur prior to April, 2002. The chapter ends with a description of two techniques to ensure the utilization of the framework by management to

⁵⁹ Both Patton (1990) and Motuz (1992) support an iterative step in planning for a review, for it offers a potentially valuable feedback to clients before a final (framework) product is delivered to them by the practitioner.

carry out an optimal review of the program; these involve explicitly situating AMPA in its organizational context, and formulating an implementation plan for the mandated review⁶⁰.

4.0 Preliminary Influences on the Research

My dissertation research began in light of the need to prepare AMPA's managers for a legislated review of the program which was required to be tabled in Parliament by April of 2002. Two influences – the Terms of Reference (Lawson, 1998) for the development of a review framework and the department's four attributes of performance management – were instrumental in providing context and shaping the process that resulted in the framework. Based upon the Terms of Reference, the main three objectives of creating the framework for AMPA were to:

- Outline the activities and outputs of AMPA and its sub-programs, as well as their expected results (i.e., program impacts)⁶¹;
- Provide a list of issues and questions relevant to future studies of AMPA; and
- Address future information needs, including data collection requirements.

A filter or method of categorizing issues, agreed upon by senior management within AAFC as relevant to any review of a departmental program, served as a second guiding force in my conception of the review framework for AMPA. (Senior management at AAFC collectively is called the Departmental Management Committee, and at the start of my research consisted

⁶⁰ While Chapter 5 provides a good validation for rational evaluation utilization in the literature, in Chapter 7 the limitations of the public service “doing it right” are explored.

⁶¹ This was achieved by creating a logic model, displayed in Figure 1 and described in greater detail in Chapter 3.

of those managers listed in the organizational chart depicted in Figure 2⁶².)

This method was packaged as four attributes of performance management – Acceptance / Relevance, Cost / Benefit, Management Effectiveness, and Results – which were promoted in the department to facilitate the review of AAFC’s programs⁶³; each attribute concerns:

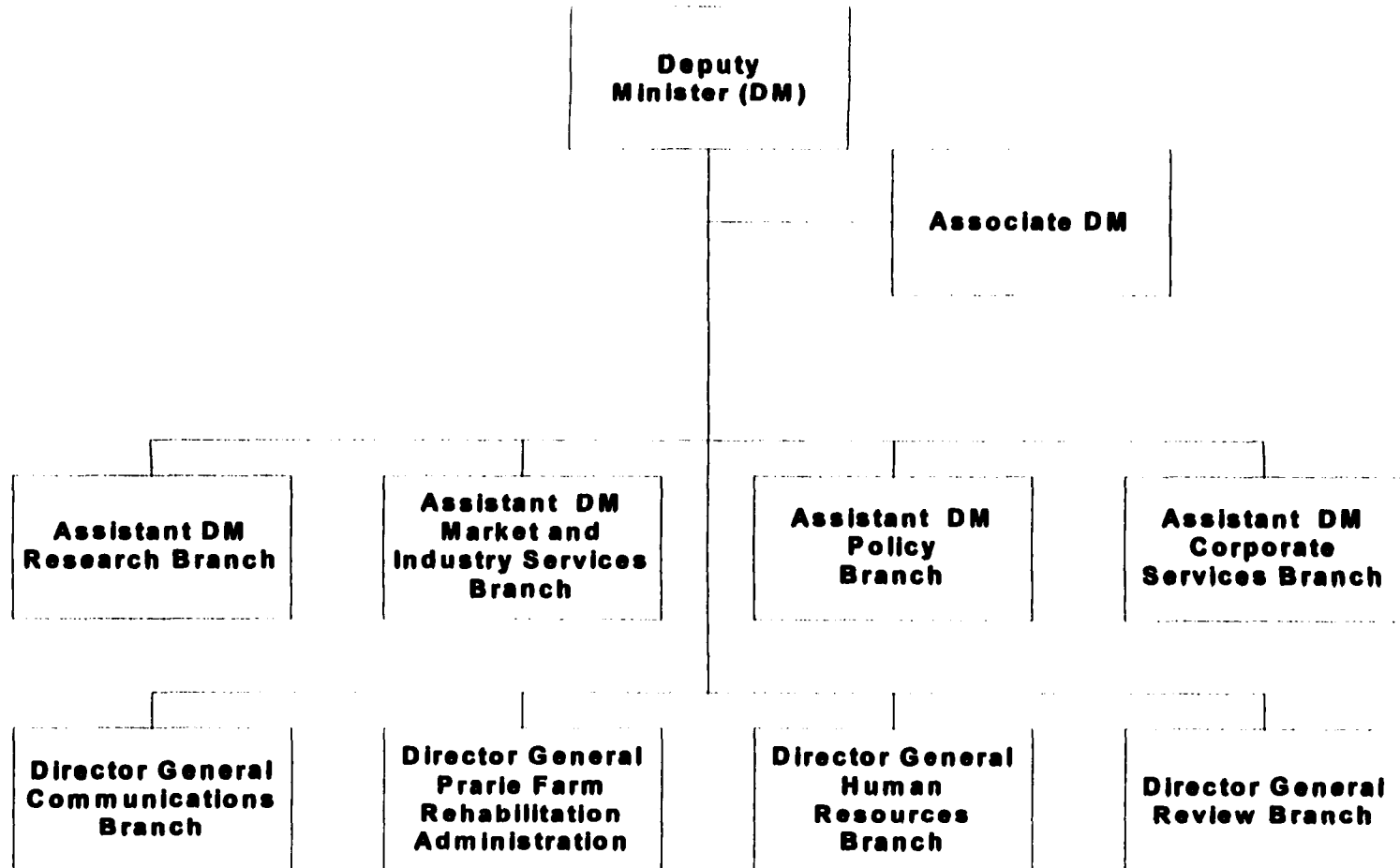
- Acceptance / Relevance (i.e., *Are a program’s activities relevant, appropriately designed and implemented, and perceived as acceptable by clients / stakeholders?*);
- Cost / Benefit (i.e., *Are the costs of a program more, or less, than its benefits?*);
- Management Effectiveness (i.e., *How well is the program and its processes being managed?*); and
- Results (i.e., *Are a program’s objectives being achieved and are there any unintended impacts?*).

Moving from these early influences on my pre-implementation methodology is each of the elements that comprised this phase of research.

⁶² As observed while introducing my mid-implementation findings (see Chapter 5), significant organizational restructuring occurred in AAFC during the two years that spanned my research.

⁶³ The four attributes employed by AAFC are very similar to the four attributes that Love (1992) refers to, as well as the three that Corbeil (1992) discusses.

Figure 2: Agriculture and Agri-Food Canada's Organizational Chart



4.1 Methodology

In this section, my two data collection techniques for creating a strategy for reviewing AMPA are outlined in detail: A review of documents relevant to the program, and interviews with 23 persons familiar with AMPA.

Data Collection Technique 1: Document Review

Many documents have been written on initiatives which preceded AMPA. In my document review, any report, evaluation, memorandum, or executive summary that could facilitate a better understanding of the current program and/or its sub-programs was consulted. Documents of particular interest included ones that addressed the history, purported objective(s), current activities and impacts of AMPA and/or its sub-programs⁶⁴. Those that provided the most insight into AMPA are listed in chronological order in Table 2.

A description of the second type of pre-implementation data collection method used, conducting interviews, appears next.

⁶⁴ Due the fact that AMPA is a relatively new program, not too many reports on AMPA *per se* existed which meant that the programs preceding AMPA were the subject of the majority of the documents that were reviewed. Fortunately, many issues common to AMPA and its precursor programs appeared in the documents written on the APCA, PGAPA, APCMA, and CFEP for them to be of use in this research phase.

Table 2: Key Documents Consulted

Author	Year	Title
Ernst & Young	1992(a)	"Evaluation of PGAPA and APCA"
Ernst & Young	1992(b)	"Evaluation of APCMA"
Agriculture Canada	1993	"APCMA, PGAPA, APCA, CFEP: Executive report [of Ernst & Young's (1992) evaluation]"
Arthur Andersen Consulting	1994	"Evaluation of APCA and PGAPA"
Cash Advance Working Group	1994	"Marketing impacts' report [on PGAPA & APCA]"
Office of the Auditor General	1998(a)	"Chapter 11: Audit of Cash Advance Program [APP]"

Data Collection Technique 2: Structured Interviews

In addition to reviewing key documents, conducting interviews are a mainstay method used by evaluators, and have been written about extensively in the literature (e.g., Austin et. al, 1982; Patton, 1990; Rossi & Freeman, 1993). In conjunction with the review of existing documentation related to AMPA (or to the APP, PPP, and/or GPP), myself and another then-employee of AAFC's Review Branch together conducted 23 interviews in July and August of 1998 with individuals⁶⁵ who were familiar with either AMPA, its three sub-programs, or both. The purpose of these pre-implementation interviews⁶⁶, like that of the document review, was to give me a sense of important program issues, especially those that would be helpful in preparing for the review of AMPA. The names for potential interviewees were

⁶⁵ Except on one occasion where two persons were interviewed together, all interviews were carried out with one individual at a time. The method of interviewing persons knowledgeable about a program and/or with specific influence is termed a *key informant feasibility study* by Austin and his colleagues (1982) and *purposeful selection of participants* by Patton (1990).

⁶⁶ In Chapter 5, my findings from the mid-implementation interviews, the empirical test of this first research phase, are described. A third, *ad hoc*, phase of research is chronicled in Chapter 6.

obtained from a list approved by senior AAFC management. The response to my request for an interview was positive: All persons who were contacted, except for two academics who believed AMPA to be outside their areas of expertise, agreed to be interviewed⁶⁷. The majority of interviewees – 19 out of 23 – worked for AAFC, but two individuals in another federal government department as well as two academics, also were interviewed. Persons interviewed for my pre-implementation research represented a wide range of expertise and positions held (see Table 3). The interview sessions ranged from 30 to 90 minutes in length.

Table 3: Interviewees’ Area of Expertise

Affiliation	Area of Expertise / Position	Number of Interviewees
Within AAFC	AMPA Program managers	4
	Strategic business planning	3
	Farm income policy	3
	AAFC Senior managers	2
	Finance	2
	Co-Operatives	1
	Market analysis	1
	Legal	1
	Grains & oilseeds	1
	International trade & policy	1
	Outside of AAFC	Finance
Academia		2
Total		23

⁶⁷ Two potential interviewees referred me to their colleagues as replacements; in both cases, the colleagues agreed to be interviewed. The high participation or response rate bodes well for the robustness of my pre-implementation findings.

In advance of the scheduled interviews, interviewees⁶⁸ were provided with a program profile of AMPA (i.e., Review Branch, 1998) which gave some background information about the program⁶⁹ and an interview guide that was developed to structure the interview sessions. (An interview guide is a series of questions that are asked during interview sessions, and the guide that was used here can be seen in Appendix 4.) Information gleaned from the documents listed in Table 2 was relied upon in constructing an interview guide for what Patton (1990) terms “standardized open-ended interviews” (p. 280).

In the next section, my analysis of the data from the reviewed documents and the interview sessions is described.

4.2 Data Analysis

The process of how the information from reviewing the documents was combined with the analyses of the pre-implementation interview notes is detailed in this section. How my data were used to guide the recommendations contained in the review framework (presented later in the chapter) is then profiled.

⁶⁸ As stated in Chapter 5, to keep the participants of my two sets of interviews separate, the term *interviewees* is used here, but the term *managers* describes the mid-implementation interview participants.

⁶⁹ Development of a program profile, according to Corbeil (1992), is a preliminary and “obligatory step” (p. 119) for evaluation practitioners in that it summarizes important points about the program from the practitioner’s perspective and allows persons more familiar with the program (i.e., staff and managers) to discuss any discrepancies, misunderstandings, etc.

Data Analysis Technique 1: Document Review

All text within the reviewed documents was considered so long as it related to AMPA and/or its precursor programs. In all cases particular attention was paid to points that were emphasized by the authors of the documents (e.g., conclusions, recommendations, summarized points). Similar to my technique in taking notes during an interview (described below), as documents were read the documents notes were taken and later reviewed for the purposes of analysis. Upon reviewing the document notes, all of the points that were made by authors were listed and arranged according to theme to allow subsequent comparison with notes taken from the interview sessions.

Three points are important to clarify in my analysis of both the documents and interview notes. Firstly, narrative analysis was the methodology that was used, but the frequency of themes also was noted. The quantitative tracking of the popularity of an authors' or interviewees' point was less important to me than the strength of their argument; nonetheless, themes and their frequency were compiled due to interest in the commonalities between sources. Secondly, whereas the comments of documents' authors is part of the public domain and, therefore, presented here without maintaining the anonymity of authors, my findings were documented in such a way as not to identify the individual interviewees who participated in my research⁷⁰. Thirdly, the key themes from documents and interviews were placed in a matrix format, to allow further comparison of information that was derived from

⁷⁰ Masking individuals' identities is even more important in my mid-implementation research: With only four interview participants (i.e., managers), gender non-specific language is employed in Chapter 5.

the two data collection techniques⁷¹.

Data Analysis Technique 2: Structured Interviews

As mentioned earlier in the chapter, two interviewers – myself and another interviewer – were present at each interview. Both interviewers took notes throughout all interviews. After each interview, time was allotted for independent transcription of interview notes, following a technique outlined by Patton (1990). Once all interviews were completed, areas of agreement from each interview were identified. Rather than establishing an *a priori* cut-off for inter-interviewer agreement⁷², only statements that were included in the notes of *both* interviewers were used as data for this research. Thus, the inter-rater agreement between the two interviewers on all the points presented later in the chapter, is 100%.

Riessman (1993) writes that “[t]he study of narrative does not fit neatly within the boundaries of any single solitary field” (p. 1). My present and past experiences in using narrative analysis techniques is that they are less constrained compared to more traditional forms of data analysis, particularly when applied to interdisciplinary areas of inquiry as in the case of this dissertation (see Vickers, 1998). That is, the qualitative methods that were employed enabled me to compare common themes which arose in the documents related to

⁷¹ As presented later in the chapter, statements that were common to both a reviewed document and interview notes constituted a primary research finding.

⁷² Bavelas (1995) indicates that, in her opinion, an acceptable range of inter-rater (or inter-interviewer) agreement is between 80% and 100%. Not only is this a wide range, there are differing views on this position in the narrative analysis literature (e.g., Riessman, 1993). Therefore, the most conservative inter-interviewer reliability option available to me (i.e., 100%) was chosen. In Chapter 5, compelling reasons for not having two interviewers are presented. Thus the process of discarding any comments made by participants (i.e., managers) in the mid-implementation interview sessions is avoided.

AMPA and/or its precursor programs with those expressed by persons who were interviewed. By creating a data matrix, the results of the document review were then compared to the thematically identified points that occurred out of the interview sessions.

In the next section, the findings that resulted from my pre-implementation research are recounted.

4.3 Research Findings

The first part of this section is comprised of noteworthy points of information that emerged in the process of carrying out this phase of research. The two types of pre-implementation findings – primary and secondary sets – that emerged from the data are then profiled. Some results were common to *both* data collection techniques (i.e., document review *and* interview processes), and I call these primary or major findings. Other findings were raised only in one method of data collection (i.e., either in the document review *or* in interviews); these are called secondary findings. Finally, the last step before completing a review framework for AMPA was taking my pre-implementation research findings and creating a draft of how they could be incorporated into an implementation plan for reviewing the program. By culling a list of key review questions from the data that were collected and analysed, matching them with specific indicators and proposed data sources, and receiving feedback from AMPA's management on these questions, AMPA's management was provided with a preliminary framework for assessing the program, and its participation in rating the importance of the

review questions⁷³ was attained. These review questions formed the basis of the review framework and shaped the implementation plan contained therein.

Researcher's Points of Information

Prior to discussing more fully the pre-implementation findings that arose out of interviewees' remarks, it will assist in the understanding of these findings if four points related to the data are highlighted up-front. Firstly, in re-reading the interview notes it was noted that there was little similarity in interviewees' responses to questions that were asked as per the interview guide⁷⁴. One reason for this lack of agreement may be that interviewees held a variety of positions within or outside AAFC, and consequently they came to their respective interviews equipped with different areas of expertise (e.g., finance, trade, policy, AMPA program management).

Secondly, rather than seeing a general theme expressed regarding AMPA, interviewees expressed conflicting views on the program. For instance, whereas one individual suggested that a particular alternative to the APP would be an excellent avenue for AAFC to explore, a second individual (independently) indicated that the same alternative would *not* be feasible.

Thirdly, persons who were interviewed provided feedback on some work that had been done

⁷³ The key review questions, plus their relative importance rating (as ranked by AMPA's program managers), are listed in Appendix 6 and described in more detail later in the chapter.

⁷⁴ The mid-implementation interviews, by contrast, were characterized by a high degree of consistency in managers' comments (see Chapter 5).

as part of the review framework. The program profile that was developed was described by one interviewee as “very good”. Other interviewees responded favourably in learning that a framework was being developed for AMPA, and voiced support for the need to do preliminary work on a proactive basis before devoting considerable resources to evaluation efforts⁷⁵.

Fourthly, and perhaps most importantly, many of the comments that were made by persons in the pre-implementation interviews were *evaluative* in nature. That is, despite the emphasis that myself and my co-interviewer placed upon the fact that we were working toward a framework that may recommend an evaluation, interviewees tended to express their views (i.e., evaluative comments) on AMPA in the interview sessions⁷⁶. “Better overall marketing and market stabilization results because of AMPA” and “There is an ‘element of compulsion’ to AMPA” are two examples of evaluative comments that were made during the interviews. More formative comments appropriate to a framework would have been, “*Identifying the actual results of AMPA is important*” and “*You’ll want show how these programs were lifesavers depending on some [producers’] conditions*”, respectively⁷⁷. Because the purpose of the review framework was broader than just evaluating AMPA, only interviewees’ comments which addressed the task of facilitating a review of the program were included in my pre-implementation analysis. In analyzing the documents, by contrast, evaluative

⁷⁵ From the mid-implementation interviews, the constructive criticism of managers on the framework – positive and negative both – is presented in Chapter 5.

⁷⁶ Interestingly, because of the focus on the implementation plan, evaluative comments were virtually non-existent during the mid-implementation interviews.

⁷⁷ The two remarks in italics are shown for illustrative purposes only, and are not based upon actual data.

comments by authors were included, given that the majority of the documents that were examined were evaluations of AMPA's precursor programs⁷⁸.

The four above points notwithstanding, a great deal of important, inductive information (see Patton, 1990) from the pre-implementation interview process was gleaned. What follows is a presentation of my primary findings that resulted from an analysis of the notes that captured interviewees' remarks and summarized my document review.

Primary Findings

From both data gathering techniques – the document review and pre-implementation interviews that were conducted – three recurring themes related to AMPA emerged:

- A clear rationale for AMPA and its sub-programs must be established and communicated;
- AMPA's societal impact(s) must be identified; and
- Evidence for the necessity of *interest-free* cash advances of the APP in furthering the objective of AMPA should be collected.

Each of these points stemming from my pre-implementation research constitutes a major finding on AMPA. An explanation of each primary finding appears below.

⁷⁸ Later in the chapter an evaluation of AMPA is recommended which definitely will benefit from the evaluative comments of interviewees in this pre-implementation research. The almost 100 pages of document and interview notes collected in developing the review framework for AMPA will serve as background information and orient the evaluators of the program before they conduct their own research. Examples of insightful comments include "It's key to see how AMPA is being perceived by producers. How is the program delivered? Does it appropriately respond to producers' needs?" Also helpful, other interviewees suggested where to look (e.g., annual crop prices, when crops were sold on the market, and when producers repaid their advances) in locating evaluative data.

Clear Rationale. Understanding the rationale or objective of a program merely means knowing what it is trying to achieve. As a result of the document review and the interviews, it was possible to observe that a rationale for AMPA – as well as *raison d'être* for the APP⁷⁹, PPP, and GPP – needed to be clarified as they were not understood by interviewees and authors of the documents that were reviewed. Indeed, this was one of Ernst & Young's (1992a) main conclusions in their evaluation. In discussing alternative ways to structure the programs that preceded AMPA, Agriculture Canada (1993) states that “[t]here is a need for a clear articulation of the policy rationale for these programs, as well as a need for modifications to the program to link them more closely to the...objective” (p. 21). It became apparent to me that many persons who had reflected on AMPA felt that the program's objective was not evident.

For some of the interviewees, the fact that the rationale or objective of AMPA was clearly stated in the *Act* as supporting orderly marketing⁸⁰ was sufficient to quell any debate on the subject, yet for others the rationale for the program was inextricably tied to what interviewees saw as the results or impacts of AMPA⁸¹ (i.e., income assistance to producers). As addressed in the next section, most interviewees, however, weren't clear about the

⁷⁹ Mirroring the finding for AMPA as a whole, the Office of the Auditor General (1998) concludes that a transparent rationale for the APP is required. Additionally, discovering how the APP contributes to the overall objective of AMPA, its umbrella program, was seen to be a requirement. The APP is featured as a separate primary finding later in this section.

⁸⁰ As described in Chapter 3, the *Agricultural Marketing Programs Act* states that the program is to “provide support for the marketing of agricultural products” (at Summary). The purpose of the APP and PPP are identified in Sections 4 and 26 of the *Act*, respectively. Section 31 deals with the GPP, but does not include a statement of its purpose *per se*.

⁸¹ The difference between objectives and impacts needs to be clarified here. The objective of AMPA is what it is *expected* to achieve; its impact is the result(s) – intended or unintended – that it *actually* achieves.

impact(s) of AMPA.

Impact(s) of AMPA. Appreciating the impact of a program – whether it be a long-term or short-term result – involves knowing which results come about because of the program’s inputs and activities. Both the interview and document data (e.g., Agriculture Canada, 1993, Office of the Auditor General, 1998) unequivocally show that the effect of AMPA on producers, producer organizations, and the agriculture and agri-food sector is not well-understood. One interviewee summed up the need to clearly establish the intended impact(s) of AMPA by stating, “You need to look at the long-term impacts [of the program]”. More specifically, whether the program provides orderly marketing to the agriculture and agri-food sector, income support to individual producers, or a way to benefit producer organizations – three potential impacts that were suggested in some of the documents and interviews – must be investigated. Interviewees were mixed in terms of which of these three possible impacts they thought were attributable to AMPA. Some interviewees saw it as a marketing program while others referred to its ability, or lack of ability, to assist the agriculture and agri-food sector in providing support to producers, producer organizations, and the CWB. For instance, one interviewee remarked, “How does AMPA expand markets?... I see AMPA as risk management [for producers] not market development”. Confusing the issue even more, another interviewee responded that, “AMPA fits well into the Expanding Markets [marketing] business line for certain commodities but not others”⁸².

⁸² For the purpose of sustaining the interest and investment of the review framework’s most direct clients – AMPA managers and staff, and AAFC’s senior management – AMPA is aligned with AAFC’s business line structure in Figure 4, found later in the chapter.

Interest-Free Cash Advances. Rather than relating to AMPA as a whole⁸³, a third major pre-implementation finding centred on one of its sub-programs, the APP. Namely, authors of the documents that were reviewed and the statements of interviewees suggested that AAFC needs to collect evidence which shows why cash advances to producers should be interest-free. In other words, the purpose or benefit of this aspect of the APP sub-program should be established. One interviewee asked rhetorically, “Are the benefits [to producers] of selling after harvest outweighing the interest-free costs?”. In light of “little economic justification” (p. 23) for interest-free advances in Agriculture Canada’s (1993) evaluation, the authors call for a re-examination of the need for them.

Several parameters of cash advances in the programs that were offered prior to AMPA were addressed in the documents that were reviewed. The \$250,000 limit was questioned by Ernst & Young (1992a) and Arthur Andersen (1994) in the two cash advance programs that preceded AMPA. Specifically, lowering the amount producers can access with cash advances to, say, \$100,000 would accommodate the majority of producers who do not apply for advances over the \$50,000 available to them interest-free, and would leave the government less open to the considerable costs associated with defaults on higher cash advances. For the CFEP, Arthur Andersen (1994) recommended that the interest rate charged to producers with outstanding accounts be re-considered to be equal or greater than the commercial lending rate. Further, some interviewees argued that the inclusion criteria

⁸³ My design of the review framework to focus on AMPA rather than its sub-programs was called into question during the mid-implementation interviews (see Chapter 5).

for the programs that preceded the APP were inequitable because not all commodities (e.g., livestock) were eligible to participate in the sub-program (see Agriculture Canada, 1993).

Moreover, some of the persons who were interviewed called for a review of the policy of interest-free advances given today's fiscal environment, and the fact that interest-free programs generally are not available in other sectors⁸⁴. Why interest-free advances are necessary has not been demonstrated by AAFC according to the Office of the Auditor General (1998). Determining whether or not cash advances provide producers with greater access to credit also was highlighted by Ernst & Young (1992a) as an important question to be answered.

As to reporting aspects of the APP such as its impact(s) and effectiveness, the OAG in its 1998 audit of the sub-program specified that one of the limitations of the APP was the lack of reporting in this regard. The OAG stated that "strong arguments exist for more actively disseminating departmental effectiveness studies" (at 11-16) to stakeholders such as producers, industry groups in the agriculture and agri-food sector, and agricultural economists. In particular, the internet as a place to feature related reports and a list of stakeholders was suggested.

⁸⁴ One person who was interviewed remarked, "You see businesses going under every day who don't get this [an interest-free loan guarantee]. Why should agriculture be any different from other industries?"

Secondary Findings

Apart from the primary pre-implementation findings identified above, additional, or secondary, issues which arose out of either the document review *or* the pre-implementation interviews emerged. These are that AMPA's management should:

- Put more emphasis on orderly marketing;
- Bring in measures to evaluate AMPA's effectiveness;
- Achieve greater transparency on issues related to the program by introducing mechanisms which allow more information exchange between management and stakeholders inside and outside AAFC;
- Establish AMPA's relevance, particularly that of the GPP sub-program;
- Identify corporate risks – contingency liability⁸⁵ (PPP) and default rates⁸⁶ (APP) – that have been associated with AMPA's sub-programs, and regularly monitor them;
- Balance client satisfaction in the timeliness of PPP price guarantees with being cautious in setting the guarantees in order to avoid contingency liability; and
- Explore the feasibility of program alternatives to AMPA.

Interviewees' comments during this pre-implementation set of interview sessions or authors' arguments in the consulted documents drove my formation of the above list of secondary findings. These findings also helped to shape the recommendations that resulted from my

⁸⁵ The contingent liability of the PPP refers to any monetary loss incurred due to the difference in set price guarantees derived by AAFC and actual commodity prices.

⁸⁶ See Agriculture Canada (1993), Arthur Andersen (1994), and the Office of the Auditor General (1998) for discussions of default rates.

pre-implementation research⁸⁷. The recommendations are profiled in the subsequent section, as they shaped how the review framework for AMPA was structured.

4.4 Recommendations in Creating the Review Framework for AMPA

Before examining the four recommendations that framed the review framework for AMPA, a process for obtaining feedback from AMPA's management on a list of key review questions that resulted from my primary and secondary pre-implementation findings is introduced. The key review questions constitute the basis of the review framework for AMPA, and contribute to the effort of fostering partnerships with the most direct clients of the framework (i.e., program managers and staff). This process is outlined next.

Key Review Questions: The Basis of the Review Framework for AMPA

In determining the most important areas of inquiry for reviewing AMPA, indicators were identified along with proposed sources for the purpose of providing answers to the review questions that were developed (see Appendix 6). Some review questions were quite general in nature, thus each one was broken down into more specific components (i.e., indicators), and then matched up with one or more data sources⁸⁸. An example of a review question is,

⁸⁷ An excellent example of this is the proposed list of indicators (profiled in Table 4) that were drafted to support the recommendation for performance measurement in AMPA (i.e., the specific collection and monitoring of program data). The list could not have been prepared had it not been for the detailed information that resulted from the pre-implementation research that was conducted. Further, next in the chapter my follow-up on the framework is featured, specifically how AMPA's managers and staff brainstormed to develop their own set of performance indicators. As a result of the framework, this information is regularly (i.e., every six months) distributed to the program's stakeholders.

⁸⁸ The importance of data sources is emphasized by the OAG in its 2000 audit of the federal government's record in performance reporting to Parliament (see Chapter 7).

“What is the economic impact of AMPA in relation to its costs?”. The indicators for this question include comparing the cost / benefit ratio of AMPA with other programs offered in the agriculture and agri-food sector, and establishing the value of AMPA to producers of specific commodities. Accompanying data sources consist of case study analysis and an economic analysis study. Equally apparent in Appendix 6 are the four attributes of performance management – Acceptance / Relevance, Cost / Benefit, Management Effectiveness, and Results – that were developed in AAFC to facilitate the review of its programs and described at the beginning of the chapter.

Once the list of review questions was prepared in the format depicted in Appendix 6, the review questions were presented to AMPA’s management who, via a method of building consensus at a management meeting, ranked each indicator and question according to its relative importance for the purpose of the planned review process⁸⁹. Given that nearly all of the issues were ranked to be of high importance by AMPA’s managers, only two issues which received a low ranking were discarded from the review framework⁹⁰.

Clearly there were too many questions for program managers to cope with in any practical manner. My next step, then, was to translate my primary and secondary pre-implementation

⁸⁹ Corbeil (1992) employed a similar step in his case study and calls it a “major accomplishment” (p. 121) in working with the direct clients of a framework.

⁹⁰ The first issue, stakeholders’ perception of AMPA’s ability to facilitate orderly marketing, was believed to be something that already was known and affirmed from previous studies (e.g., Office of the Auditor General, 1998a; Agriculture Canada, 1993). The second issue, Canadian import rates of AMPA-eligible products, was (correctly) believed to be too complex a phenomenon to be attributable to one program (AMPA) in a meaningful manner.

findings into recommendations for creating the review framework for AMPA which was then tested in my mid-implementation research phase (see Chapter 5). These recommendations included the development of an implementation plan that encouraged compliance with the mandated review of the program.

My goal, however, was not only to provide a list of recommendations: A concrete, practical, and usable review framework that would encourage stakeholder involvement and sustain the interest of AMPA staff and managers was sought, thereby encouraging organizational compliance with the legislatively mandated review of the program. To that end, a key theme throughout the recommendations is a comprehensive partnering approach to encourage and sustain direct client involvement⁹¹.

Indeed, Helgason (1999) advises that good planning involves identifying the users or clients (cf. Chapter 7) of recommendations and includes tangible steps to assist in their implementation. She continues, “[c]lear findings and recommendations, outlining main alternatives for action, are more likely to get [decision-makers’] attention and provoke subsequent action” (p. 36) than alternatives without them. In providing AMPA’s management⁹² with recommendations on how to best get ready for the review of the program

⁹¹ Two particularly client-friendly aspects of the framework profiled in the latter part of the chapter is the situation of the framework in its organizational business line context and the creation of an implementation plan for AMPA’s management to use in applying the recommendations set out in the review framework.

⁹² Leblanc and Kelly (1988) believe that responsibility rests with management to be able to report on program-level effectiveness. As shown in the implementation plan in Figure 5, AMPA’s management – located in one branch, the MISB, until the spring of 2000 – needs to co-operate with other branches within AAFC in order to be able to carry out some of the review strategies. Further, the Minister of AAFC reports to Parliament and ultimately is responsible for implementing the review framework’s recommendations.

before April of 2002, my recommendations are based mainly on the primary findings of my pre-implementation research, to some extent on secondary findings, and expanded upon the key review questions that were developed.

These findings translate well into recommendations to AMPA's management for implementation so that it could prepare adequately for the legislated review of the program.

The four recommendations made to AMPA's management were to:

- 1) Develop a set of performance measures⁹³ for AMPA and its sub-programs, and distribute a semi-annual status report to stakeholders;
- 2) Develop a "think-piece" with the purpose of clarifying AMPA's objectives and known impacts and distribute this information to program stakeholders;
- 3) Engage in fulfilling a series of management actions; and
- 4) Conduct a full evaluation of AMPA and its sub-programs.

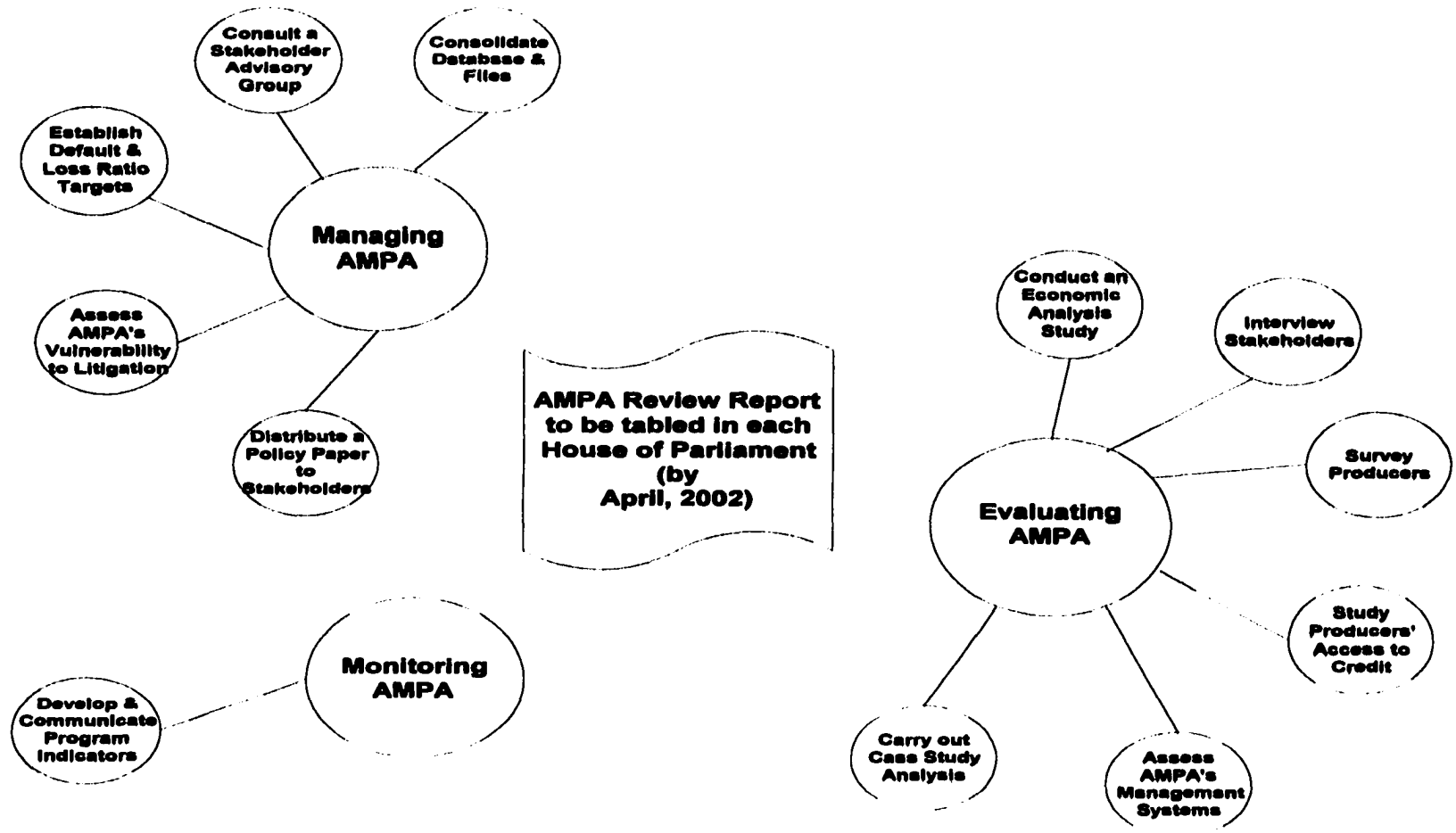
The recommendations were further grouped into three main categories; these are:

- Managing AMPA;
- Monitoring the program; and
- Evaluating AMPA.

Each category contains specific tasks that AMPA's management should undertake (see Figure 3).

⁹³ The terms *performance measures* and *performance indicators* are used interchangeably in the literature, however are distinguished here with measures being more specific than indicators. Thus, Table 4 provides a clear gauge – rather than a vaguer indication – of how AMPA's performance may be measured.

Figure 3: AMPA Review Strategies



The relationships between my preliminary research findings and my recommendations are considered next. The first element in the review framework to be addressed is the monitoring of AMPA by developing and using performance measurement information.

Monitoring AMPA

Monitoring a program on a regular basis (i.e., performance measurement) can provide the managers of that program with periodic updates on how the program is doing or its performance⁹⁴. With the goal of introducing performance measurement into AMPA, monitoring is necessary for three main reasons; it:

- Identifies areas where a program may be vulnerable and where additional analysis may be required;
- Provides information useful for annual reporting on program performance as set out in the *Agricultural Marketing Programs Act*; and
- Enables program management to convey performance information to interested stakeholders.

With emphasis on the last two points, my first recommendation is that AAFC develop a set of performance measures so that it can regularly monitor AMPA and its sub-programs. Suggested measures, listed according to sub-program, for ongoing monitoring are posted in

⁹⁴ The many benefits of program monitoring have been identified elsewhere (e.g., Patton, 1990; Rossi & Freeman, 1993; Scriven, 1993; OAG, 1998; Helgason, 1999).

Table 4⁹⁵.**Table 4: Proposed Key Performance Measures by Sub-Program**

Sub-Program	Performance Measure
APP, PPP, & GPP	• Annual administration costs
	• Number of agreements per year
	• Volume of product covered
APP	• Number of participating producers per year
	• Annual interest costs and impact of interest rate fluctuations on future costs of the sub-program
	• Distribution of annual cash advances (total for sub-program and average per producer)
	• Annual default rate (total outstanding: recoverable versus unrecoverable, and collection costs)
PPP	• Number of participating producers per year
	• Annual contingent liability rate
	• The impact of price fluctuations in commodities on future sub-program costs

In addition, from this process it is recommended that AMPA's managers develop an annual status report on the program for distribution to departmental managers and other key program stakeholders⁹⁶. Agriculture Canada (1993) – in focusing on previous initiatives – posits that “[p]rogram administrators recognize that continued efforts are required in the area

⁹⁵ Alert readers will notice that the measures are not *outcome* measures of performance. In introducing performance measurement, it is easier to begin with measures of *activities* (see Barnes, 2000). At a meeting with AMPA's managers and staff on 16 March 1999, this list of performance measures was modified slightly based upon their input. More information on the measures is included in Chapter 5.

⁹⁶ As noted in Chapter 2, involving stakeholders – specifically by disseminating information of interest to them – is strongly suggested in the literature by Motuz (1992), Myers (1992), and Rossi and Freeman (1993).

of coordination and communication with stakeholders” (p. 7). Later on in the evaluation, the authors conclude that “[t]here is a need for more transparency in interactions with producer organizations” and other stakeholders (p. 22). My recommendation of distributing an annual status report on AMPA builds communication into the process further ensuring that the recognition of the importance of communication with stakeholders is carried out and acted upon.

In developing performance measures for AMPA, it was proposed that the following questions required consideration:

- Which stakeholders should receive an annual monitoring report?
- What should be the level of analysis for the measures (e.g., by region, commodity, producer organization)?
- How frequently should the information be collected (i.e., cost versus utility)?
- Who is responsible for collecting and reporting the information?
- What are the resource levels and systems required for monitoring AMPA?

In the following section, my focus shifts from monitoring program performance to suggested future outreach or actions of AMPA’s management.

Management Actions

In Chapter 2, it was demonstrated that the premise of contingency theory – namely, that an organization must meet its goals to survive – implies that organizations must have explicit

goals and that these must be well-known within organizations. Without clearly stated goals, one can infer, organizations are in trouble. It is reasonable to assume that the premise could be brought down for consideration to a more micro-level, to that of a program rather than an entire organization. One of the pre-implementation findings that emerged from both the document review process and the interviews conducted for the purpose of constructing this review framework was that the impact(s) of AMPA program was not clear. Some of the individuals interviewed were of the opinion that supporting producers' income is the overall impact of the program, yet others believed that facilitating the orderly marketing of agriculture and agri-food products was the more likely result of AMPA.

In re-thinking the two opposing views of the program's impact that came out of analyzing the data, it is possible to conclude that determining the impact(s) of AMPA was not an either / or type of task. The federal government, via AAFC, is using AMPA to support the marketing systems of agriculture and agri-food products and one (unintended) impact⁹⁷ out of this activity could be optimizing producers' returns. The important point is not limiting the number of impacts due to the program; instead, it is ensuring that the impacts – both intended and unintended – are identified and communicated to help to rectify the confusion. To ensure that AMPA's impacts are understood clearly, the second recommendation in the review framework is that AAFC develop a "think-piece" or paper clarifying the objective and

⁹⁷ Unintended impact(s) are the results of a program that are not expected because they are not specified in the objective(s) of that program (e.g., Segsworth, 1992; Agriculture Canada, 1993; Scriven, 1993).

impacts of AMPA and its sub-programs within the program's overall policy framework⁹⁸.

In light of the benefits of disseminating information to program stakeholders described above, the paper should be distributed to all stakeholders interested in AMPA.

Dobell and Zussman (1981) argue that “[p]rograms are not necessarily designed to attain their stated objectives, for a number of reasons including a possible desire to mask the program's true intentions and to appear to serve a wider constituency” (p. 10). Rather than viewing this as a cynical position, it may be regarded as a realistic one that touches upon the role of politicians trying to appease their constituents and non-partisan civil servants attempting to do what is right based upon (apolitical) criteria such as efficiency and effectiveness (see Mertens, 1999; Leblanc & Kelly, 1988)⁹⁹.

For now, it suffices to say that the recommended “think-piece” paper will situate AMPA within AAFC's policy framework, and thereby highlight any existing gaps or inconsistencies particularly once the results of the program are identified. As to its circulation to program stakeholders, in writing about traditional evaluations, Helgason (1999) posits that they “do not have any effect because no attention is paid to communicating findings...in an effective and timely fashion” (p. 36).

⁹⁸ This recommendation is consistent with one posited in the evaluation conducted by Agriculture Canada (1993); namely, that an articulation of policy on AMPA's precursor programs be carried out, as well as the promotion of the programs' objectives.

⁹⁹ This subject is re-visited in my final chapter.

However, numerous other actions must be promoted to ensure that AMPA's management are ready for a review of AMPA. Thus, my third recommendation is that program management initiate the following:

- Establish targets for acceptable APP default rates to prepare against potential risks to AAFC;
- Assess AMPA's vulnerability to litigation, similarly to mitigate departmental risks;
- Review and consolidate information in the AMPA database and hard-copy file system to make sure that necessary information is available for future review use and other requests; and
- Discuss the review framework and proposed review process with an advisory group made up of program clients and other key stakeholders.

Mitigating risks for AMPA was one of the secondary findings that was described in terms of contingency liability and default rates in the previous chapter (see also Ernst & Young, 1992b). Determining AMPA's vulnerability to litigation, something that could be done under the guidance of the Legal Services division in AAFC, expands the scope of risk management for the organization, and is particularly relevant with the contractual obligations, third-party delivery (i.e., by producer organizations) of the program, and potential for non-compliance by producers (see Arthur Andersen, 1994).

As to the third management action listed above, reviewing and consolidating information, Agriculture Canada (1993) refers to the lack of documentation available to program managers on day-to-day operations in the programs that preceded AMPA. Some suggested

information to be gathered from the pre-implementation interviews and documents reviewed was:

- Annual crop volumes supported by the APP and PPP;
- GPP applications and implementation details;
- Decisions for implementing / not implementing the GPP;
- Financial cost of AMPA compared to pre-AMPA initiatives;
- Proportion of APP defaults on advances under and over \$50,000; and
- Number of defaults within the CWB and each producer organization.

Finally, given that review fosters increased and sustained involvement with direct clients and stakeholders (see Chapter 2), the last point contained in my third recommendation, an advisory group, requires further elaboration. Firstly, by consulting representatives of the agriculture and agri-food sector, AMPA's management can gain valuable feedback on its review strategies as well as attain program stakeholders' acceptance of the review process. Secondly, given that the Minister of AAFC "must review the provisions and operation of [AMPA] in consultation with the Minister of Finance" (*Agricultural Marketing Programs Act*, at 42), it is essential to confer with the department of Finance throughout the review process in order to incorporate the department of Finance's suggestions well in advance of preparing the review report. Thirdly, a positive purpose also will be served by the "think-piece" paper; namely, communication. One of the persons interviewed in conducting my pre-implementation research for developing the review framework remarked,

There's not much knowledge about AMPA in my office since it's been enacted [in

1997. There's a need] to disseminate information better...solicit feedback, and get producer organizations on board to review [related] documents".

Communicating the objectives of AMPA was one of my primary pre-implementation findings.

Program Evaluation

The next element put forward in my recommendations to AAFC was a full evaluation of AMPA. Taken with the ongoing monitoring of the program, as well as the commitment to encouraging a number of management actions, an evaluation of AMPA will offer a rounded review of the program as it is a technique especially suited to identify program impacts and possible improvements. Specifically, the evaluation process will need to ensure that evidence for demonstrating the impact(s) of AMPA and its sub-programs, as well as the benefits of the APP interest-free cash advances, is available. The secondary pre-implementation findings outlined earlier in the chapter also need to be acted upon¹⁰⁰. However, because there is no one indicator which can easily measure the impact of AMPA, the method of triangulation¹⁰¹ is proposed so that the evaluation contains a number of

¹⁰⁰ The assumption behind the evaluation of AMPA was that it address the issues that arose in the 1995-96 consultations with the agriculture and agri-food sector on the topic of AMPA's precursor programs (see Chapter 3). For example, the evaluation should investigate whether or not AMPA represented real improvement over past initiatives. In Chapter 7 the absence of trade-related issues in the framework is revealed due to my *ad hoc* legal analysis into the appearance of a mandatory review clause in the *Agricultural Marketing Programs Act* (see also Chapter 6).

¹⁰¹ Triangulation – also known as convergent validity – is a strategy that uses multiple techniques to measure the same phenomenon so that the results of an investigation are less likely to be due to any biases associated with a particular experimental method (see Patton, 1990).

different review strategies¹⁰².

The full evaluation of AMPA should consist of:

- Surveying producers and interviewing all other stakeholders of AMPA to determine their perceptions on various issues¹⁰³;
- Assessing AMPA's management systems to ensure that they are efficient and effective;
- Carrying out an economic analysis of AMPA to track the program's impact(s) on the sector in comparison to a variety of alternatives and to gauge the program's impact on individual farms;
- Assessing producers' access to credit and repayment terms; and
- Conducting case study analyses employing select quantitative and qualitative data to make program comparisons based upon factors such as commodity type, region, producer characteristics, and farm size.

The first suggestion, conducting a survey, was oft-repeated in the pre-implementation

¹⁰² To investigate the extent to which AMPA influences orderly marketing, for instance, six different data sources have been specified (see Appendix 6). However, as indicated in my profile of the key review questions earlier in the chapter, making attributions on global phenomena – such as the marketing of agriculture and agri-food products – to one program, is usually not meaningful.

¹⁰³ From the interviews conducted for my pre-implementation research, it was suggested that the selected survey sample for the evaluation of AMPA consist of large and small producers, and be representative of commodities and regions which participate in the APP and/or PPP sub-programs. Issues that were raised to be addressed by the survey are: Stakeholders' perceptions on the impact of AMPA; relevance of AMPA and its sub-programs in today's environment; a profile of producers who participate in the APP and PPP; client satisfaction on the appropriateness of sub-program design and delivery; stakeholders' perceptions of policy alternatives; appropriateness of the APP's crop eligibility criteria; benefits of interest-free provision (APP) and price guarantees (PPP); and the extent to which AMPA reduced inequities, inconsistencies, and program costs compared to its precursor programs.

interview sessions. Calls for surveying producers, producer organizations, and other surveys were general, as in one person's "[D]o a survey" as well as specific in identifying which items should comprise the survey (e.g., questions on participation levels, program uptake, farm-size of program participants). The key review questions listed in Appendix 6 summarize the issues to be addressed in the survey, and were documented to ensure organizational compliance with the mandatory review clause in AMPA's legislation and encourage a concomitant completion of a comprehensive review of the program.

As for an examination of AMPA's management, the evaluation literature defines this component as addressing process (Whitehead & Avison, 1999) and doing a process evaluation (e.g., Patton, 1990). The notion of including the agriculture and agri-food industry's perspective on how AMPA was being managed was suggested by several interviewees. For instance, it was proposed by one interviewee that "clear terms and conditions and solid agreements" between AAFC and producer organizations be determined to be in place. Some additional questions to be considered here (e.g., presence / absence of training opportunities for employees, human resource initiatives, succession plans) could focus more on factors affecting AMPA's staff who administer the PPP, liaise with the producer organizations who deliver the APP, or who are employed in an administrative support function.

Economic analysis similarly was raised as an issue for further investigation: Job creation and producers' access to credit was mentioned by pre-implementation interviewees. One person

advised that the circulation of capital in rural communities could be examined; another indicated that the “social costs and benefits” of AMPA be investigated¹⁰⁴.

Finally, case study analyses were put forward by interviewees as a worthwhile area of exploration. As one respondent stated, “[a] case study approach would be a good way to get at the detail of the program”. Arthur Andersen (1994) successfully employs case study analysis on some of the programs that preceded AMPA to address program management issues such as compliance and non-compliance rates of program participants (also see Ernst & Young, 1992a). By looking at individual producers, or categories of producers as can be seen in Angus Reid (1998), the impacts that the program is achieving, individual producers’ risk factor for default, as well as program management issues such as the identification of high risk accounts can be determined. Another interviewee referred to a ginseng producer in Quebec who was able to raise substantial funds to plant this type of crop, but was unable to access additional financing from banks. The example touches upon the access to credit situation faced by members of the farming community.

The Office of the Auditor General (1998a) warns that credit access for producers may be less during more difficult economic times (i.e., when higher interest rates are in effect). The access to credit issue also was raised by Ernst & Young (1992a) who quoted a major lending

¹⁰⁴ In order to conduct this analysis, AMPA’s outcomes would have to be identified, as well as the costs associated with achieving those outcomes. In the words of Rossi and Freeman (1993), “many evaluators pay little attention to costs and are unaware of the information sources they need to contact and the complexities of describing program costs” (p. 371). Whitehead and Avison (1999) advise that priority should be placed on identifying outcomes and describing them in financial terms, a not unreasonable expectation that they argue evaluators have been unsuccessful in meeting (see Scriven, 1993).

agency in Quebec indicating that the period after harvest is the time “when agricultural debts / lines of credit with financial institutions are highest” (p. 14). Producers thus are pressed to sell at an inopportune time in order to have the funds to be able to pay off various seeding, planting, and harvesting costs. A number of pre-implementation interviewees expressed concern that bankers were becoming less and less understanding of the agriculture and agri-food sector, suggesting – as the Cash Advance Working Group (1994) does – that fair financial backing of producers by banks and credit unions is by no means guaranteed. Agriculture Canada (1993) offers a different perspective by presenting the possibility of government-assisted programs usurping the role of banks.

In summary, then, it is anticipated that *all* of the recommendations described in the review framework for AMPA will provide the program’s management and AAFC with valuable information about AMPA and its sub-programs to support the preparation of the mandated report to Parliament in 2002. Of particular significance, each element discussed in this chapter is featured in an implementation plan for the framework. The plan includes the timeline, resources, and responsibilities for all review actions. Creating the implementation plan for the review of AMPA, and situating the review framework in its proper context, both came about to ensure the utilization of the review framework for AMPA. This chapter ends with a description of the implementation plan and the organizational context for the framework, two tools developed to assist AAFC in its compliance with the mandatory review clause present in the legislation governing the program (cf. Chapters 6 and 7).

4.5 Ensuring Utilization of the Review Framework

As Mertens (1999) writes, “how [to] interact with...decision makers so that...real change” (p. 12) comes about is the quintessential challenge behind suggestions for improvement after the review of a program has taken place. One technique, which was derived from the best practices put forward in the evaluation literature to ensure a greater likelihood of recommendations being adhered to, was situating the review framework for AMPA in the context within which the program operates. The details of this technique appear in the following section.

Review Framework Situated in Context

As indicated in Chapter 2, many commentators (e.g., Patton, 1990; Hudson, 1992; Love, 1992; Motuz, 1992) have explicitly placed programs within an organizational context. For example, Shadish et al. (1991) refer to contingency theory as supporting “practices that vary depending on situations” (p. 62)¹⁰⁵. In addition, one of the persons interviewed for my pre-implementation research voiced that AMPA should be shown to emphasize its place within AAFC’s corporate structure, or lines of business, and many others referred to AAFC’s business lines in the interview. Finally, the authors of one of the analysed documents proposed that “[AAFC] should adopt a single policy approach for these programs in order to harmonize the overall approach and improve coordination of the programs” (Agriculture Canada, 1993, p. 21). The single policy approach referred to here emerged two years later in AAFC, and is embodied in the business line structure of the department. An

¹⁰⁵ Contingency theory and rational evaluation utilization are linked in Chapter 2.

organization's lines of business are its main areas of focus for strategic planning and performance reporting. At the time that my dissertation research was conducted, AAFC had four business lines; these were Expanding Markets, Strong Foundation for the Sector and Rural Communities, Innovating for a Sustainable Future, and Sound Departmental Management¹⁰⁶. It was recognised that the co-operation of all of the department's branches and executive offices was required in order for the department to operate along the four lines¹⁰⁷ (AAFC, 1998a).

Figure 4 was devised to showcase the links between AMPA and the relevant business line activities within AAFC. On the left-hand side of the figure is a summarized logic model for the program (cf. Figure 1) in which the purpose of AMPA and its sub-programs is reflected (i.e., the provision of cash advances for the APP, price guarantees for the PPP, and buying / selling capacity for the GPP to help reduce marketing-related risks and liabilities faced in the sector and thereby facilitate orderly marketing of agriculture and agri-food products). The anticipated primary (i.e., intended) and secondary (i.e., unintended) impacts of AMPA and its sub-programs also are depicted. The right side of Figure 4 identifies the two business lines related to AMPA and their respective key result areas or goals to further solidify the link between AMPA and AAFC's strategic direction.

¹⁰⁶ In Chapter 5 the reader will find that some organizational restructuring has occurred in the department since the start of my dissertation research. Among the changes are a move to three lines of business, rather than four. Apart from the increased attention paid to risk management, consumer confidence, the quality of life of all Canadians, the new business lines – Security of the Food System, Health of the Environment, and Innovation for Growth – are more similar to the old ones than different.

¹⁰⁷ Without a business lines structure, AAFC was run along individual branch lines. This "silo" effect, appropriately named in the department of Agriculture and Agri-Food Canada, did little to contribute to the achievement of organizational goals.

At the time that the review framework was constructed, AMPA was situated within the Expanding Markets business line¹⁰⁸. The key result area or goal of this business line was to contribute to market development (i.e., increasing the sales of Canadian agriculture and agri-food products both domestically and internationally¹⁰⁹). Through the instruments provided by AMPA and other programs within this business line, a more integrated supply chain management approach to the food system and maximized benefits from domestic market opportunities were expected to result.

A second strategy devised to ensure a greater adherence to the AMPA review framework was developing an implementation plan for it. This subject is studied next.

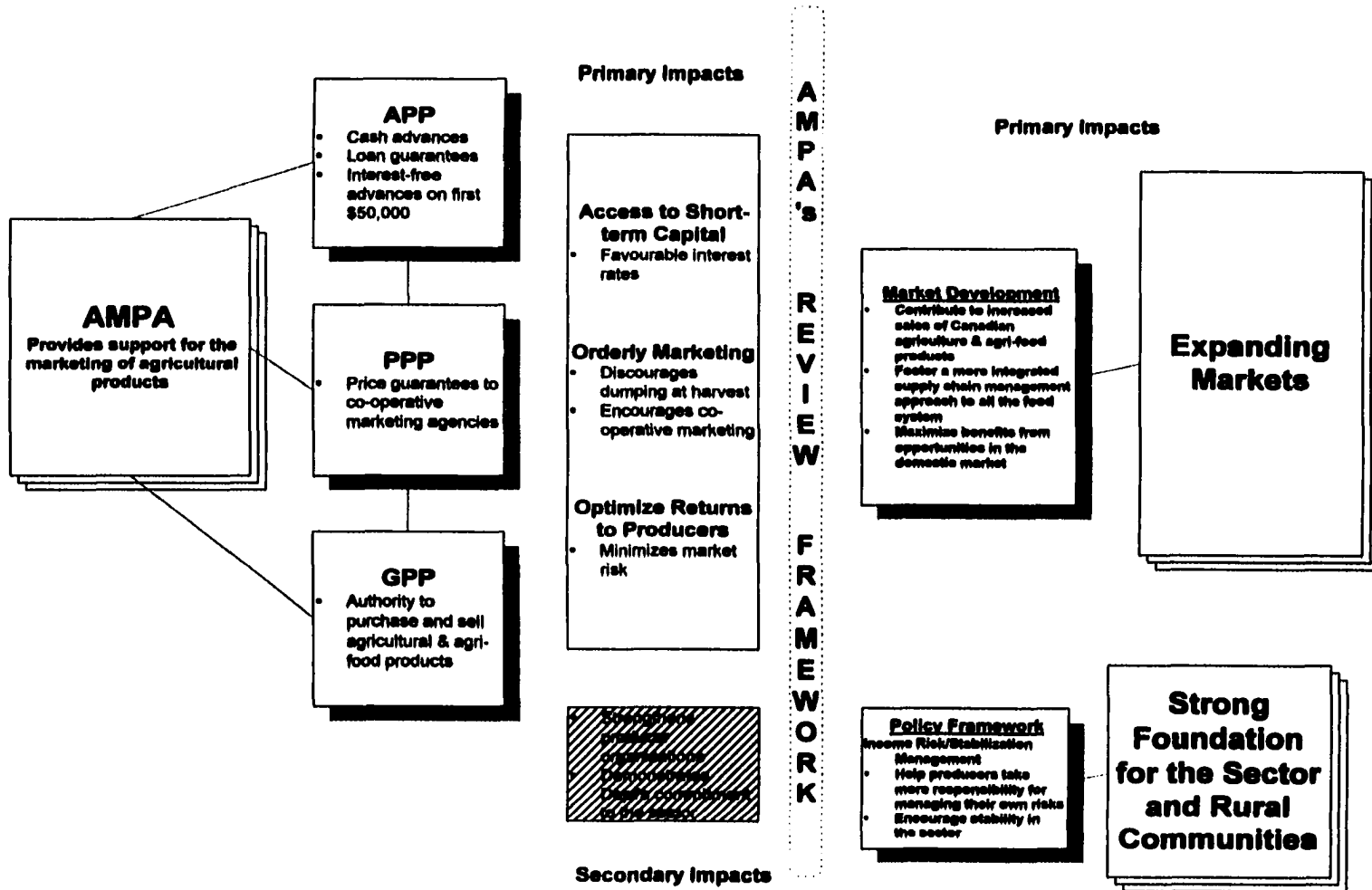
Review Framework's Implementation Plan

In order to offer to AMPA's management some potential time-lines and resource commitments associated with the review strategies that were recommended to them, an implementation plan for these most direct clients of the review framework (see Figure 5) was created (see Figure 5). The implementation plan essentially is a list of all of the recommendations presented previously in this chapter. It also shows how long each review strategy is expected to take.

¹⁰⁸ In December of 1998, the review framework was signed off and approved by AMPA and senior AAFC managers. At that time, the program was housed in the Expanding Markets business line. In 2001, AMPA was located under a new Innovation for Growth business line, but its key result area was nearly identical to the previous one (i.e., to capture diversifies markets for Canadians products and services).

¹⁰⁹ AAFC set a target of \$20 billion in exports by the year 2000, and by early 1999 \$23 billion already had been achieved. The significance of trade in the dissertation becomes more apparent in Chapters 6 and 7.

Figure 4: AMPA's Fit Within AAFC's Business Line Structure



Further, the responsibility for each review strategy within AAFC – with inter-Branch co-operation required – as well as respective resource and time requirements, also is summarized in the figure¹¹⁰.

It is expected that all the strategies will be completed no later than four months prior to submitting the final report to Parliament (i.e., December, 2001). As indicated earlier in the chapter, this four-month period should allow AMPA's management sufficient time to prepare the Parliamentary report reviewing the program. In the next chapter, Chapter 5, program managers reveal the extent to which the recommendations were followed and the framework was utilized. Finally, because the chapter contains a comparison of the committed plan for the framework to the extent of implementation that actually occurred two years after the framework was created, the figure is entitled *agreed to implementation for AMPA*.

¹¹⁰ Figure 5 features *FTD* which indicates the best estimate of the Full-Time Days required for one employee. It should be recognized, however, that *FTDs* may not be consecutive working days. The other abbreviation in the figure – *Q1, Q2, etc.* – refers to the quarters of the fiscal year.

Figure 5: Agreed to Implementation Plan for AMPA

AMPA Review Actions	1998		1999				2000				2001				2002	
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1		
Monitoring AMPA	[Bar chart showing activity from Q1 1999 to Q4 2001]															
Develop Indicators		■	Program Managers facilitated by Review Branch (RB)													
Annual Reports	◆		◆		◆		◆		◆		◆		◆			
Managing AMPA	[Bar chart showing activity from Q1 1999 to Q4 2001]															
Policy Paper	■		MISB & Policy Branch										■			
Legal Assessment		■	Legal Services													
Default/Loss-Ratio Targets			■				Program Managers									
Advisory Group	■		Program Managers													
Files & Database			■				Program Managers									
Evaluating AMPA	[Bar chart showing activity from Q1 1999 to Q4 2001]															
Interview Stakeholders			RB: 75 FTD + \$20,000 (travel)				■									
Assess Management Systems			RB: 15 FTD				■									
Economic Analysis Study	RB & EPAD: 30 FTD		■													
Access to Credit Study	RB: 30 FTD + \$10,000 (travel)		■													
Case Study Analysis														RB: 10 FTD	■	
Survey Producers	RB: 50 FTD + \$50,000 (consultant)		■													
Reporting to Parliament	[Bar chart showing activity from Q1 2001 to Q1 2002]															
Prepare Report														Program Managers	■	
Table Report														Program Managers	■	

By depicting the recommendations in this way, the process for getting ready for the review of AMPA is mapped out as specifically as possible, thereby providing a practical plan for the framework. It is expected that the organization will be able to anticipate the resource requirements necessary to review AMPA, and consequently will allocate the required human and financial resources to gain valuable information about AMPA and its three sub-programs. By adhering to the recommendations provided in this chapter, and implementing the implementation plan as a guide, the assumption is that AAFC will be better prepared to comply with the legislation that governs the program and specifies a mandatory review (cf. Chapters 6 and 7).

This assumption is tested in the next chapter which features the methodology and findings of the second or mid-implementation phase of my research, which took place two years after the review framework was developed and presented to AMPA's managers. It thus serves as an empirical gauge of the extent to which the strategy that I developed to prepare AAFC for the review of one of its programs was of assistance to the organization.

CHAPTER 5: WHAT REALLY HAPPENED –**AN APPRAISAL OF AMPA'S REVIEW FRAMEWORK**

The purpose of this chapter is to present follow-up evidence two years after the review framework for AMPA was created in order to examine the extent to which the framework met expectations according to its managers¹¹¹, the persons who were tasked with implementing it and getting ready for the legislated review of the program. In particular, the methodology used in the collection and analysis of mid-implementation data resulting from interviews with program managers is described, and the findings from these interviews are recounted. This mid-implementation follow-up, or second research phase, includes taking stock of the parts of the framework which were followed through, as well as those components of the plan that were not. It features the rationale provided by managers for the decisions that were made from the time the framework for AMPA was created and agreed to by them, and gives insight into the utilization of this type of tool for preparing for review including its potential for direct client buy-in and lessons learned from client usage¹¹².

¹¹¹ Throughout this chapter the persons who were interviewed for the mid-implementation research are referred to as *managers*. (So as not to confuse them with the *pre-implementation* research explained in Chapter 4, this research is called the *mid-implementation* phase.) To be more precise, one of these managers is a Director who is responsible for all of AMPA. This individual has three managers reporting to him: One manager for the PPP, and two APP managers. As mentioned in Chapter 4, the term *interviewees* is used for documenting the earlier, pre-implementation interviews.

¹¹² My mid-implementation research shows that despite many unexpected changes in AAFC – as well as a few other outside influences – the framework is defensible, effective, and on-track in terms of moving forward. It commands management loyalty to review, and adapted well to unanticipated organizational upheaval and changes in management. My third, or *ad hoc*, research phase chronicled in Chapter 6 calls into question, however, the extent to which the proactive tools contained in the evaluation literature assist practitioners in their work if it is not accompanied by a conscientious effort to understand the motivation behind instigating review activities.

5.0 Research Methodology

In this section, the methodology for the interviews that occurred after the review framework for AMPA was implemented is outlined. First the process for collecting my mid-implementation research data is explicated (i.e., how the interviews were structured and conducted), and information about the program managers who were the participants in these interviews is presented. How the notes from these interviews were analysed in order to present the results of my mid-implementation research is then explained.

Data Collection Technique: Structured Interviews

The objectives in carrying out the mid-implementation set of interviews can be placed into three general categories with the purpose of testing the review framework for AMPA; these are to:

- Ascertain which parts of the framework were implemented, and which components were not;
- Explore the reasons underlying the extent of implementation observed two years after the framework was created; and
- Obtain feedback about the framework itself, particularly on its utility.

To that end, a series of 11 questions to be posed to all four managers of AMPA were developed. Managers were provided a copy of the interview guide in advance of the mid-implementation interviews. The open-ended interviews were held with one person at a time (see Chapter 4) and took place over a two-week period in November 2000. Each interview

lasted an average of an hour.

It must be noted that it was the second interview for the same four program managers who were part of the 23 interviewees in the pre-implementation research. As illustrated in Appendix 5, the questions used during the mid-implementation interview sessions, however, were different. Three areas of interest were represented in the questions to gauge the extent to which the framework assisted AAFC in preparing for a legislated review of one of its programs. The first section of the interview guide facilitated the probing of the degree of the framework's implementation two years after it had been created and agreed to by program managers. The second part of the guide was included to elicit any reasons for the lack of implementation of the framework to-date. That is, the guide was devised to afford me a conservative (i.e., negatively-biased) test of my original hypothesis in that it was designed to look for a *lack* of implementation of the review framework for AMPA. The assumptions inherent in the guide were that little progress had been made by managers on following up on the implementation plan¹¹³.

The third section of the interview guide consisted of questions to determine the utility of the review framework to program managers. Questions focussing on the best and worst aspects of the framework were featured, and suggestions for improvement of the framework were

¹¹³ This was my starting point. When the academic committee members of my dissertation decided that I needed to embark upon the mid-implementation research phase, the informal information available to me at the time indicated that little follow-up had been done. Two AMPA managers whom I contacted over the phone before the interviews took place told me that the review of the program was well-behind schedule due to a number of organizational factors.

sought. In addition to lessons learned in working with the framework in preparing for the review of AMPA, its program managers were queried in the third part of the guide on the extent to which they felt bought-in to the process of reviewing their program as a result of the framework being in place.

The rationale for selecting AMPA's managers again as participants for this phase of my dissertation research was that the managers were the persons within AAFC who were most directly responsible for implementing the review framework for the program. Thus, they were uniquely positioned to provide information on its utility (or lack thereof), and were placed within the department in such a way so as to detect both facilitative and impeding factors influencing the framework's implementation. Indeed, there are no other stakeholders who would have the same degree of "on the ground" insight into the process of implementing the review framework.

Yet unlike the protocol for the pre-implementation phase of my research (see Chapter 4), it was not possible for me to carry out the mid-implementation interviews with a colleague as I had done previously. The rationale for deviating from my earlier procedure was that my involvement in the development of the framework potentially would make it awkward for AMPA's managers to provide feedback of a critical nature. Thus, a third-party consultant was engaged to interview program managers with the expectation that managers would be more candid in their comments about the framework, especially in identifying areas in which the framework may have failed them.

It is paramount to detail here precisely how the necessity of encouraging candour, as well as ensuring the distance that a third-party interviewer can offer, led to digression from the pre-implementation interviews. In particular, my lack of participation in the mid-implementation interviews made the presence of two interviewers to establish inter-interviewer reliability infeasible. However, to mitigate the potential of interviewer error or misinterpretation, an explicit system of iterative or feedback-loop communication was employed by the interviewer in order to ensure the accuracy of the notes taken to capture managers' responses to the questions asked of them. That is, after each section of the interview guide was completed, the notes from participants' comments were read back to them, providing managers with an opportunity to add to, change or clarify what had been recorded by the interviewer. This technique is often used in clinical counselling and other fora as a standard and accepted practice in conducting qualitative research with only one interviewer present during the interview sessions (Denizen & Lincoln, 1994). As explained in the next section, though, the fact that four managers were interviewed – compared to 23 interviewees in the pre-implementation interview sessions – resulted in significantly less volume in transcribed interview notes, thus avoiding the need to select only certain participants' responses as was done in identifying my pre-implementation findings.

Data Analysis

As described in Chapter 4, the notes of the two interviewers from the pre-implementation research were compared such that only those responses which appeared in both interviewers' notes (i.e., were 100% reliable) were retained for determining my pre-implementation results.

Due to the interviewing technique of employing regular feedback mechanisms that was used, we may have confidence in the mid-implementation results despite the fact that the responses of managers were not checked against the notes of a second interviewer.

As with the pre-implementation interviews, the interviewer's notes from this second research phase were analysed qualitatively and reflected in a narrative description presented in the next section¹¹⁴. This description constitutes the results of my mid-implementation phase of research. The analysis of these data was based upon a compilation of all of the managers' responses to each question that appeared on the interview guide. As already mentioned, given that the amount of interview notes was much lower with the fewer number of participants than in the pre-implementation interviews, there were only a small number of statements from this set of interviews that are not reflected later in the chapter. In fact, those comments that were omitted were ones that convey the same sentiments that already appear in quotations that form the findings narrative¹¹⁵. The findings of the second, or mid-implementation, phase of my research is the subject of the following section.

5.1 Research Findings

My mid-implementation research was carried out to test the strategy developed to prepare AAFC for a review of one of its programs, and the findings from this phase are based upon the comments made by managers during the second set of interviews reported in my

¹¹⁴ The benefits of narrative analysis, particularly in certain investigations, are articulated in Chapter 4.

¹¹⁵ Readers will notice in the next section that, unlike participants in my pre-implementation research phase, program managers expressed a great deal of convergence in their (independent) interviews.

dissertation. The presentation of these findings was organized to follow the three sections of the interview guide which were highlighted earlier in the chapter¹¹⁶.

Extent of Implementation of the Review Framework for AMPA

Perhaps the easiest way to determine progress made on the commitments identified in the implementation plan put forward in the review framework for AMPA is to do an overlay of the original plan (Figure 5) with the plan that emerges from the data collected in the mid-implementation interviews with program managers two years after the plan was agreed to by them (Figure 6)¹¹⁷. Figure 6 was drafted to feature the components of the original implementation plan that have been completed, and to make a distinction between the *actual* (circa November, 2000) and *agreed upon* implementation plan (circa December, 1998). All components of the original plan that have not been carried out have been dropped from Figure 6.

The exceptions are those initiatives that AMPA's program managers advise are scheduled to take place in 2001. The vertical line set at the end of 2000 in Figure 6 roughly demarcates when the interviews for the mid-implementation research took place. As described later in the chapter, a variety of factors put off the review framework's implementation in some areas

¹¹⁶ Later in the chapter it is reported that the timing of those actions that have yet to be completed are estimated based upon the managers' comments during the mid-implementation interviews.

¹¹⁷ As referred to later on, as well as in Appendix 5, the extent to which the framework was implemented was the first question on the mid-implementation interview guide. The third-party consultant who carried out the interviews with program managers observed that beginning the interviews with this question served as a good "ice-breaker" and allowed managers to tell the "implementation story" in a less formal manner. Subsequent questions permitted managers to fill in the story and the interviewer to probe or clarify comments related to implementation.

with the result that a number of initiatives have been delayed but still are anticipated by program managers to be completed before the review of AMPA is required to be tabled in Parliament (i.e., by April of 2002)¹¹⁸.

Questions 1 and 2 in the mid-implementation interview guide were designed to be able to construct such an overlay, for they ask managers to describe the progress to-date on the implementation of the framework. From their responses, Table 5 was prepared to summarize the areas of completion, as well as specify whether or not certain areas were anticipated to be carried out before the review of AMPA is tabled in Parliament. As can be seen in the table, just under half (i.e., 5 of 13 or 39%) of the recommendations agreed to in the framework were completed or were in progress two years after they were signed off in the formal plan by AMPA's managers. Yet this is the least satisfactory way to present the mid-implementation findings. By looking to the managers' reasons for going ahead with some components of the committed implementation plan, and not others, as well as at their responses to the subsequent 9 questions in the interview guide, a more fulsome picture of the utility of the review framework for AMPA emerges.

¹¹⁸ The likelihood of these initiatives being followed through before the deadline set out in the mandatory review clause of the *Agricultural Marketing Programs Act* is addressed later in the chapter.

Figure 6: Implementation of Review Framework at Two Years

AMPA Review Actions	1998		1999				2000				2001				2002
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	
Monitoring AMPA	[Shaded area]														
Develop Indicators						■ Program Managers facilitated by Review Branch (RB)									
Annual Reports			◆		◆		◆		◆		◆		◆		
Managing AMPA	[Shaded area]														
Policy Paper										MISB & Policy Branch				■	
Legal Assessment															
Default/Loss-Ratio Targets															
Advisory Group						Program Managers				■					
Files & Database		■								Program Managers					
Evaluating AMPA	[Shaded area]														
Interview Stakeholders						RB: 75 FTD + \$20,000 (travel)				■					
Assess Management Systems															
Economic Analysis Study	RB & EPAD: 30 FTD		■												
Access to Credit Study															
Case Study Analysis	RB: 10 FTD		■												
Survey Producers						RB: 50 FTD + \$50,000 (consultant)				■					
Reporting to Parliament	[Shaded area]														
Prepare Report										Program Managers				■	
Table Report										Program Managers				■	

Table 5: Implementation Summary of Review Framework Recommendations

<i>Implemented</i>	<i>Not Implemented</i>
Monitoring AMPA	
Indicator Development	
Semi-Annual Status Reports	
Managing AMPA	
Files and Database (<i>ongoing</i>)	"Think Piece" Paper (<i>consultant hired</i>)
	Legal Assessment (<i>dropped</i>)
	Default / Loss-Target Ratios (<i>discussions held with lenders</i>)
	Advisory Group (<i>consultant hired</i>)
Evaluating AMPA	
Economic Analysis Study	Interview Stakeholders (<i>APP and PPP advisory groups</i>)
Case Study Analysis	Assess Management Systems (<i>dropped</i>)
	Access to Credit Study (<i>APP and PPP advisory groups</i>)
	Survey Producers (<i>APP and PPP advisory groups</i>)

It is insightful to present each component of the formal implementation plan, and report on its status in turn. In considering the three types of recommendations specified in the review framework for AMPA – monitoring, managing, and evaluating AMPA – my follow-up on the first, monitoring, appears next.

Monitoring AMPA. The components of the three types of recommendations can be seen in

Figure 3. Two monitoring actions – developing performance indicators and semi-annual reports – were put forward and agreed to in the review framework for AMPA (see Table 5). As stated in Chapter 4, the Review Branch facilitated a brainstorming session with AMPA program managers and staff in March of 1999 which accomplished this task¹¹⁹. From the mid-implementation interviews with managers, it is apparent that every six months since the framework was signed off, semi-annual reports have been prepared and distributed to AMPA's various stakeholders.

Managing AMPA. Managing the program involved a greater number of review-related activities for program managers to oversee in comparison to monitoring, and in most cases these were initiated. In order of their appearance in the agreed to implementation plan, and as can be seen in Table 5, only the consolidation of AMPA's files and database has been carried out two years into the planned schedule of the review framework. A new Management Information System (MIS) now is up and running to track financial and non-financial information – including the performance indicators – that will be required for reviewing AMPA¹²⁰.

In contrast, writing and distributing a “think-piece” paper, conducting a legal assessment of

¹¹⁹ Later in the chapter the indicators that resulted from this session are considered. For now, suffice it to say that five broad categories of performance indicators were decided upon by AMPA's managers and staff at the session; these were: program results, client service, program costs, resources, and private sector performance.

¹²⁰ From the mid-implementation interviews it also was determined that the PPP will have a greater ability to report to the Department of Finance with the new MIS. This is a good example of the efficient use of one data capture system to facilitate a number of reporting / accountability functions.

potential risks related to AMPA, setting of default or loss-ratio targets for program participants, and establishing an advisory group all had not been completed two years after the framework had been accepted for implementation by managers.

In asking managers about the reasons behind the relative lack of implementation under the management recommendations outlined in the review framework, one of the managers replied that [s/he¹²¹] “did not understand or know enough about the policy rationale [for AMPA] to do this”. However, at the time of the interviews, a consultant had been hired by the AMPA unit to prepare a discussion paper on AMPA’s policy rationale.

A second area that was not completed at the time of the mid-implementation interviews, but that was scheduled to commence in late 2000 or early 2001, was the formation of an advisory group for AMPA. The same consultant working on the “think-piece” paper was retained by AMPA’s management to co-ordinate and oversee the formation of an advisory group function. At the time of the interviews, a list of advisors to sit on this group had been drafted, and the advisors had been informally contacted about their participation. Formal invitations, however, had been put on hold pending the results of the November 2000 federal election campaign. Also noteworthy was the fact that two managers indicated during their respective interview sessions that two advisory groups, in contrast to the one referred to in

¹²¹ Given that there were only four managers in my mid-implementation interviews, indicating the gender of the manager in some cases could have identified individuals. To avoid this, gender non-specific language was used when referring to my findings in this research phase.

the review framework and implementation plan, were to be formed¹²². Further, they mentioned that the advisory groups may include some members who sit on both groups to provide continuity between the groups¹²³.

From the mid-implementation interviews, it also was possible for me to determine that the legal assessment purposely was dropped off the agreed to implementation plan, rather than simply overlooked. As one manager phrased it, the legal assessment “was not considered integral to the rest of the framework implementation plan”. Similarly, default or loss-ratio targets for program participants were not set, though one manager referred to discussions that s/he had with lending institutions on that subject¹²⁴.

Evaluating AMPA. For the third type of recommendation, the evaluation of the program, two distinct studies were completed in the two years following the creation of the review framework for AMPA. A consultant (other than the one previously mentioned), had been tasked in 1999 by the Review Branch to carry out case study analyses which consisted of an economic analysis of the APP. According to one of the program managers interviewed, the economic analysis of APP case studies was only partially related to AMPA in that it involved only one of its sub-programs, the APP, and in fact was “...driven by a need to inform the

¹²² As indicated later in the chapter, the reason for two advisory groups rather than one is to recognize the distinct nature of the APP and the PPP, the two active sub-programs of AMPA.

¹²³ Later in the chapter some modifications that managers made to tailor the framework to their needs are highlighted, and at that stage some insightful lessons that they learned in the process of taking a plan for review and trying to implement it are included.

¹²⁴ As stated in Chapter 3, these targets are applicable to the APP and not the PPP.

Deputy Minister¹²⁵ [of AAFC] on this topic for the safety net envelope only, and therefore [they] did not cover all of AMPA's review needs as a whole"¹²⁶. Issues of safety net funding and AAFC's senior management priorities re-emerge later in this section, at which point more information about the two studies collapsed into one is presented.

Assessing management systems – including identifying the presence / absence of training opportunities for employees, supporting human resource initiatives, and creating succession plans (see Chapter 4) – was another component discarded from the agreed to implementation plan. By contrast, the surveying of producers, interviewing of stakeholders, and carrying out an access to credit study, though not yet completed, are scheduled to occur some time in 2001. The reason for the delay and uncertainty surrounding these components of the agreed to implementation plan was provided by managers in the mid-implementation interview sessions; that is, the two advisory groups needed to be in place in order to get their input on the process prior to initiating any other evaluation activities. As one manager reflected, "...all [evaluation] studies are still planned subject to the advisory committee's [sic] approval. The framework definitely is being respected", adhered to, and appears to be the guiding document for reviewing AMPA.

¹²⁵ The Deputy Minister is the most senior bureaucrat in AAFC (see Figures 2 and 7).

¹²⁶ The funding for AMPA comes out of what is referred to in AAFC as the *safety net envelope*. Housed under the same funding arrangement as the Net Income Stabilization Account and the more recent Agricultural Income Disaster Assistance program, the arrangement does little to sort out confusion of the achieved objective of AMPA as either an income stabilization program or an orderly marketing program (see Chapter 4).

Next the rationale behind the choices to wholly implement some of the review framework's recommendations and not others is the focus, and a number of interesting comments made by managers during the mid-implementation interviews are brought forward.

Reasons Behind the Extent of Implementation To-Date

I included four questions in the mid-implementation interview guide (see questions 3 to 6 in Appendix 5) to address why many components in the agreed to implementation plan had not been completed two years into the process of working with the plan. It appears that two main factors – some organizational, and others contextual and outside of the AAFC responsibility domain – were largely influential on the progress of implementation. These two factors are characterized below.

Organizational Factors. The mid-implementation interviews with managers revealed that, organizationally, a lot occurred in the two years since the review framework for AMPA was developed and formally agreed to by program managers. For instance, within the AMPA unit, "H[uman] R[esources] was thin. Most staff are new and this added corporate memory problems to the reasons for the delays in implementing the AMPA review". Additionally, managers pointed to the fact that for a year beginning in the fall of 1999 and extending to the fall of 2000, the director of AMPA to whom the APP and PPP managers report, was on an extended leave of absence. The managers felt that they did not have sufficient authority or responsibility to implement many components of the framework without their director's presence and support.

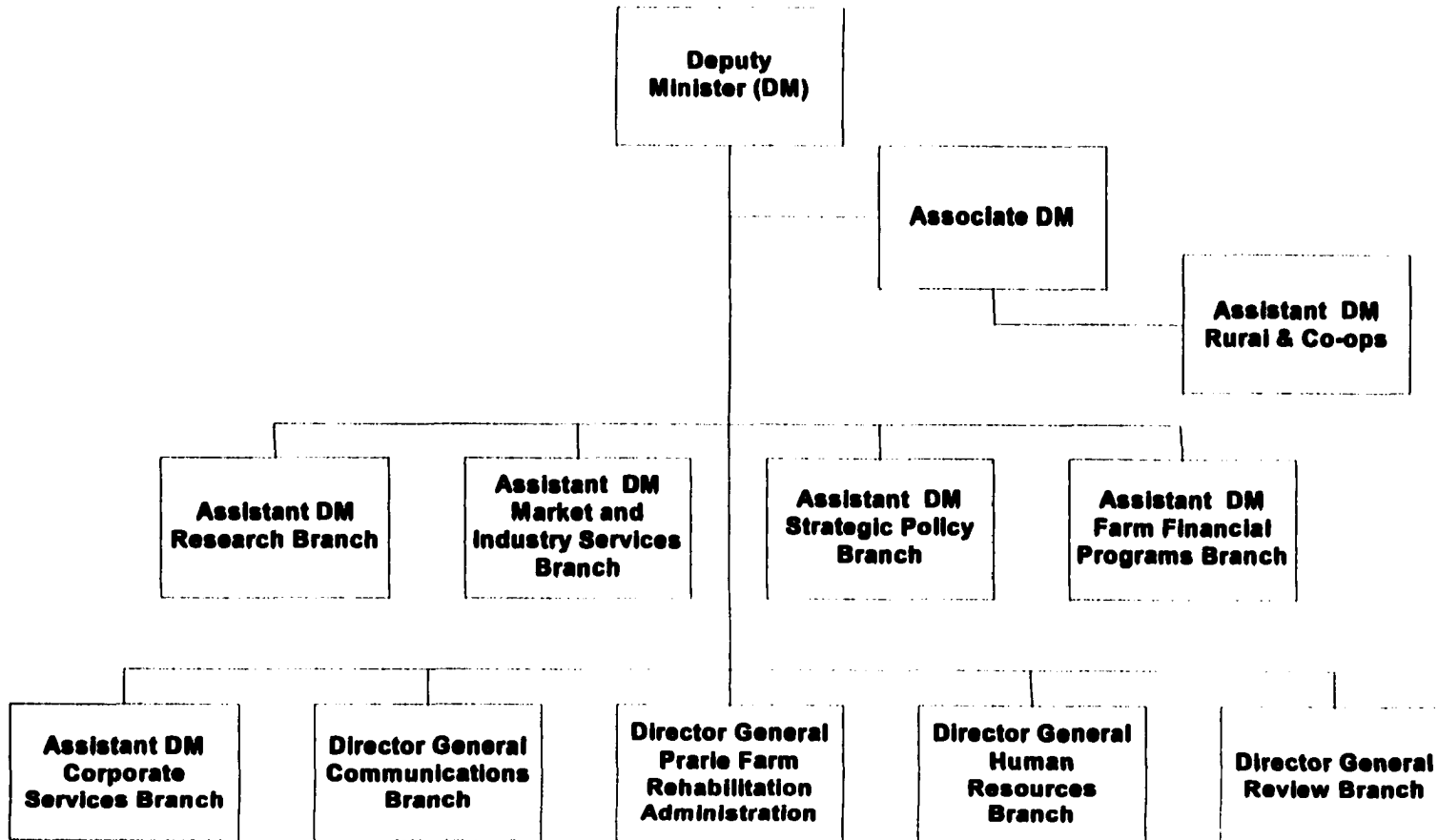
But the human resource challenges were not confined to the AMPA unit. During the interviews, managers observed that the Review Branch lost "...key staff early on [resulting in the Review Branch] not hav[ing] sufficient corporate memory until recently to be able to help with or conduct the AMPA review implementation". One manager recounted that "[t]he participation of Review Branch is critical" to the successful implementation of the review framework for AMPA. Another manager (independently) concurred, stating that "[t]he program [internally] did not, and still does not, have the necessary [expertise] to conduct the review [of AMPA] unassisted", underscoring managers' reliance on the Branch for assistance well after the framework for the program was conceived. This manager continued:

There was an understanding that Review Branch was to undertake the implementation of this review framework, in large part, including giving training and guidance to [AMPA] program staff.

As stated earlier in the chapter, some of that training was provided in facilitating a session with AMPA staff and managers to help them develop performance indicators, but that appears to be the only review-related training offered by the time the mid-implementation interviews took place.

Managers also observed considerable organizational restructuring within AAFC over the past two years. Shortly after the arrival of a new Deputy Minister in the spring of 2000, AMPA was moved to a newly created branch in the department, the Farm Financial Programs Branch. (The new organizational structure of AAFC is shown in Figure 7.) As one manager stated, the move significantly "... slowed down the implementation of the review process".

Figure 7: Agriculture and Agri-Food Canada's Organizational Chart at Two Years



There was some concern that the new organizational arrangement included other “safety net programs [which may] take priority over AMPA”, and uncertainty as to what the program’s future holds, at least in specific terms, was expressed. One manager revealed:

Another possible reason for the lack of implementation may be the fact that there is some discussion about the relevance or appropriateness of having AMPA as a distinct program rather than incorporating or integrating its important features into another, larger set of programs. Consequently AMPA may disappear as AMPA.

An additional organizational factor that emerged from managers to explain the delay in implementing some of the agreed to plan’s components was that although the financial and human resources identified in the review framework (see Figure 5) were “good and quite feasible”, the monies that were allocated but went unspent over the two years were returned to the TBS, as per its relevant policy, and were not able to be carried over for use in subsequent years. As one manager opined, “...there is more of a challenge to find the needed resources for the AMPA review in this final year [of the implementation plan]”.

The last organizational factor to be raised by managers in explaining why some components of the committed plan were not implemented was the evolving setting of priorities within the department which influenced the time commitments of the Farm Financial Programs Branch, as well as those of the AMPA unit. For example, a newly announced program co-ordinated by AAFC, the Spring Credit Advance program:

...Was identified by senior management as a much higher priority and therefore took much of the resources -- both human and money -- that would have been needed to implement the AMPA review on schedule. This program's timelines were much shorter [and] therefore more urgent.

Another manager specified that "...senior management buy-in needs strengthening especially regarding the reality of *doing* these [legislated] reviews. This [review] may not have been taken as seriously as it should (emphasis reflected in interview notes)". The same manager had "great concern" over the quality of the review given the time that had elapsed, as well as concerns pertaining to the current human and fiscal resource constraints that s/he faced, and went so far as to say that "[t]he quality of the review report is definitely in jeopardy now".

Non-Organizational Factors. The second type of reasons cited by managers during their mid-implementation interviews as influencing the lack of progress on some of the formal review plan components can be classified as non-organizational. These include contextual and external factors that have, in the opinion of managers, impeded the implementation of the review framework for AMPA. One manager pointed out that it takes time to deal with the 55-plus producer organizations who participate in delivering AMPA, "in order to get them on-side with the review [process]".

Another factor was that the farm situation in Canada has been getting more fractious, "...much worse than it was at the AMPA review framework's conception". Indeed, producer

groups and the mainstream media in Canada have been referring to a farm crisis for the past 12 months¹²⁷. One manager stated that "...work [and] research plans needed to be changed in response requiring a great deal of attention and resources to deal with these immediate concerns, and [this] slow[ed] any activity on the AMPA review".

Taking organizational and non-organizational responses into account, when managers were asked who was responsible for going ahead with some parts of the committed plan, and not implementing others, senior managers at the Assistant Deputy Minister¹²⁸ level were proposed as being responsible by one manager. This manager indicated that "[s]enior management made the decision to put the AMPA review 'on ice' based upon their [sic] priorities and the relative time remaining for AMPA versus other 'more urgent' programs' needs". Another manager appraised the situation at the time of the mid-implementation interviews as follows: "Although 6 months ago [the review of AMPA] was 'out of everyone's scope', it is now on everyone's desk because the timelines are getting very short with the legislated due date of 2002 approaching". This sentiment was echoed by a different manager; s/he remarked, "*Now* the focus is definitely on the review of AMPA" (emphasis reflected in interview notes).

¹²⁷ Even after the federal government infused an unexpected (i.e., in addition to money available under current programs) \$500 Million in farm aid in March of 2001 – with provinces matching the funds to a tune of another \$300 Million – many farm leaders and some provincial Ministers of Agriculture were demanding that the money be rejected until it reached a \$1 Billion federal contribution.

¹²⁸ As specified earlier in this section, the Deputy Minister is the bureaucratic head of AAFC (see Figure 7). Just under the Deputy Minister in the organizational hierarchy is the Associate Deputy Minister, and below this position are several Assistant Deputy Ministers and Directors General who are responsible for AAFC's branches. These senior managers make up AAFC's Departmental Management Committee as shown in Chapter 4.

In exploring the reasons behind the lack of implementation of the agreed to plan to-date in some areas, the perceived significance of the mandatory review clause in the *Agricultural Marketing Programs Act* that spurred the development of the framework in the first place also was probed during the mid-implementation interviews with managers. One manager highlighted the fact that the clause was "...all very new to the department's accountability and reporting systems". Nevertheless, the view of managers appeared to be that the mandatory review clause in the *Act* provided the necessary impetus for the review process. As one manager stated, "if it were not legislated, the review would not be done". A second manager remarked that the "[l]egislated review is good as it has forced us to look at issues that we might otherwise not have investigated". It must be noted, however, that another strong driver mentioned by one manager was a report of the Office of the Auditor General tabled after the review framework was developed.

Given my review of the reasons for the status of the agreed to plan's implementation two years after the plan had been created, it is possible also to turn to managers for insight into the extent to which they found the review framework for AMPA to be utilitarian or client-focused from their perspective.

Utility of the Review Framework

Overall, positive feedback on the framework itself was received in response to questions 7 through 11 of the interview guide for the mid-implementation interviews. As one manager put it, "[t]he framework identifies the important steps and issues in a review of AMPA".

And another, “[t]here was nothing in the review framework that was *not* useful” (emphasis reflected in interview notes). Later in the chapter, however, it is intimated that the favourable comments do not preclude some candid and constructive criticism which managers proposed for the framework.

Three managers used the metaphor of a road map in describing the review framework’s utility in preparing for the tabling of a review of AMPA prior to April of 2002. One manager articulated that “[t]he review framework as it stands, provides a very good road map to educate and address needs of a comprehensive review as dictated by the [OAG]¹²⁹ and the [*Agricultural Marketing Programs Act*]”. A second manager stated “[we] would have felt lost without it, and wouldn’t have known where to start in terms of getting prepared for the review as specified [in the mandatory review clause of the *Act*]”. A third manager noted using the framework as a reference tool “innumerable times”.

In addition, managers expressed their buy-in for the review framework. One manager reflected on the process of creating the framework and recalled that it “got everyone very involved”. A second manager cited the program managers’ inexperience with review prior to the development of the review framework for AMPA, and felt that the:

[R]eview framework document really helped to start the review process and got everyone thinking about it, especially as it interpreted and clarified the

¹²⁹ This is a reference to Chapter 11 of the Office of the Auditor General’s (1998a) *Annual Report to Parliament* which was focused on the APP. It was one of the key sources for my document review in the pre-implementation research phase of the dissertation, and is described in Chapter 4.

issues and general processes of conducting a review.

Further, using the review framework as a vehicle for obtaining buy-in seems to have expanded beyond the AMPA unit. The mid-implementation interviews with managers revealed that the framework "...has been now distributed widely internally"; "has facilitated AMPA getting buy-in from TBS on the adequacy of the review process"; "has already been very useful in responding to the [OAG] as evidence of progress being made towards improved accountability"; and that it "is useful to answer questions raised by other external parties" such as AMPA's stakeholders. On the latter, one manager emphasized that the review framework has "...demonstrated to [the agriculture and agri-food] industry that AMPA is actually doing things and not just saying that things will be done".

Yet the greatest sign of the buy-in experienced by managers may be the lessons that they themselves described learning in the two years that they have had to implement the framework. As an example, one manager reported feeling the need to be more diligent about interacting with the Review Branch of AAFC. As this manager phrased it, "[we needed to] provide more encouragement to Review Branch to stay on top of the [review framework] file in light of their [sic] staff changes". Another manager pointed out that a dedicated project manager within the AMPA unit is needed for the review; s/he stressed the importance of "[d]esignat[ing] a program manager from day one so that the review does not get lost". This observation led to a project manager being hired, as well as one dedicated staff member in the AMPA unit to facilitate the review process. In addition, a contract was awarded to the

consultant referred to earlier in the chapter who is to help with the advisory group. This same manager spoke of the (unanticipated) “upside” of not having implemented the entire review process as specified in the framework; s/he told the interviewer “...that we [also] have learned a lot by waiting”. S/he expected this experience to offset some of the potentially negative consequences of starting later with many of the components of the AMPA review than what was agreed to in the implementation plan.

A number of further benefits of not fully implementing the framework on schedule were enumerated by managers during the mid-implementation interviews. One perceived benefit was having had the opportunity to speak with many of the producers because of the newly created Spring Credit Advance Program. Had some components of the formal review plan been carried out earlier, one manager believed that s/he would have missed this window of opportunity that the just-initiated program afforded to communicate with the program’s clients. In developing performance indicators for AMPA, another benefit was discovered. The manager who made this point was looking into one rule of the program and decided that it was too resource-intensive to monitor. But the process also revealed that the rule was “too stringent [and] applicable to very few cases”, thus the rule presently is being reconsidered by managers and may be discarded from the program administration protocol. Finally, and as detailed earlier in this section, managers made the observation that the one advisory group for AMPA recommended in the implementation plan needed to be split in two.

For all its utility, according to program managers, several suggested improvements to the

review framework were brought forward during the mid-implementation research phase of my dissertation. Three main areas of criticism came out of the interviews; they are:

- Making a greater separation between the APP and the PPP;
- Anticipating, as much as possible, the ideal versus actual circumstances involved in applying such a plan to a real-world setting; and
- Writing the review framework document with a wider audience in mind.

On the first suggested improvement, one manager lamented that “[t]he [implementation] plan tried to look at AMPA as a whole and did not sufficiently recognize the distinctness of the two sub-programs [the APP and PPP]”. This was articulated in another, more passionate manner, by a second manager who advised: “Scream louder about the two programs, not just [about] AMPA”. The essence of these comments is that more separation of the sub-programs within AMPA should have been reflected in the review framework.

The second difficulty of planning for an ever- and fast-changing future was noted by several managers. One expressed her / his encouragement by indicating that “[i]f you do not plan, you do not get anything”. However, the framework was viewed, in some ways, as representing an ideal state of affairs, in addition to being a set of *guidelines* for managers to follow. One of the managers interviewed indicated that at the time of inception:

The AMPA review framework was very well done and was perceived as useful and appropriate. However, it does present an ideal, ‘perfect world’ implementation picture and especially assumes that the exercise is appropriately funded. This was not the case.

Another manager independently supported this statement by noting that there are “...problems of implementing any plan, no matter how well-laid. In reality, [the] priority that the Spring Credit Advance Program received [over] AMPA” was apparent. Yet another manager proposed a contingency-based approach attached to the implementation plan that involved posing the question, to use her / his words, “What if certain things in the framework or implementation plan do not get done?”

The third area of suggested improvements to the review framework for AMPA concerns the intended audience that managers believed the review framework was directed at; namely, themselves and other managers within AAFC. Given the utility of the framework document and the potential it has for encouraging review-related buy-in beyond the AMPA unit and AAFC, managers would have liked the document to “have been less academic and more ‘user-friendly’ as it has been quite widely used to educate people about the review process”. One manager acknowledged, however, that “[i]t could be that the document was not intended for such a wide audience” (which it was not). To underscore the desire to use the review framework to communicate it externally, the consultant referred to earlier in the section recently had been hired to summarize the framework into a more simplistically-worded document for producers “as part of [an] ongoing education process”. For future reference, and as one manager put it, “[w]hen writing such documents a wider audience should be assumed”.

In the next section, these findings are considered in a wider context and discussed.

5.2 Discussion of Findings

The mid-implementation results that were introduced in this chapter are a test of the *durability of the phenomena*, as Bavelas (1995) terms it. That is, the extent to which review frameworks or any other type of review-related plan are “here today, [or] gone tomorrow” is vulnerable to the willingness of government to support evaluation of its programs and the commitment of employees and managers who conduct and contribute to audit, evaluation, and review. Indeed, as Framst (1995) reports, “[p]rograms tend to be dynamic [and change] in response to new knowledge and circumstances” (p. 131). The influences that shape programs and organizational decision making are varied but generally include:

- Evolving organizational structures; political and governmental changes;
- The shifting nature of the needs of program stakeholders; and
- The results of previous or existing strategies and practices used.

My research implies that, in the absence of current indications to the contrary, the AMPA program itself, as well as the process involved in reviewing it, is fairly durable at least until a review report is presented in Parliament before April of 2002¹³⁰. In this section, the mid-implementation findings are examined in more depth and in conjunction with the organizational factors and timing issues that influenced the implementation of the review framework for AMPA. The extent to which the framework was implemented is re-assessed, and deemed successful while nevertheless exhibiting room for improvement.

¹³⁰ The extent to which formative tools can assist practitioners of evaluation and review if they do not take into account the rationale behind review is the subject of the final chapter of the dissertation.

Organizational Factors and Timing Issues

As stated in Chapter 2, contingency theory accounts for the reality of disparate results in organizational achievement by relying on two basic assumptions. Firstly, there is no one best way for an organization to perform; and secondly, due to the context-specific differences of various organizations, not all ways of organizing are equally effective (Galbraith, 1973). To be effective, organizations need to have a good fit between the way they function and the conditions upon which meeting or surpassing their goals rest. For example, if conditions within or outside a given organization change, the organization must respond by adjusting its performance appropriately.

At the time the mid-implementation research phase of the dissertation was conducted, only about 12 months¹³¹ were left for AMPA's managers to carry out the actions which were not already initiated in the review framework's agreed to implementation plan. All four managers interviewed referred to organizational factors that impeded the progress, as scheduled, in carrying out the recommended actions that were articulated as a result of my pre-implementation findings. These factors included the:

- Arrival of a new Deputy Minister for AAFC;
- Movement of AMPA into a newly created departmental Branch;
- Lapse of monies to fund many of the implementation plan's components;

¹³¹ As noted earlier in the dissertation, this estimate is based upon the fact that a report tabled in Parliament no later than April of 2002 has several months of senior management and Ministerial approvals in store even after it is completed. Thus, the end of December of 2001 is considered a realistic end-point for any review-related activities to be finished so that their results may be summarized and integrated with the actions that had been carried out prior to this deadline.

- Absent AMPA manager (i.e., Director); and
- Lack of monitoring on the plan by the Review Branch.

Despite these significant organizational factors, and the department's attention on the so-called farm income crisis, two related and unexpected discoveries that came out of the mid-implementation interview notes were the amount of review activities that had occurred or were underway at the time of the interviews, and the extent of managers' buy-in for the review process. In this regard, managers' implementation actions corroborate and speak at least as loudly as their words.

(Re-)Assessing Implementation

Earlier in the chapter, the observation was made that assessing the follow through on the actions outlined in the implementation plan by reporting a percentage of completed review activities was probably the least insightful or accurate approach to gauging implementation. After all, the most useful implementation information is that which allows an understanding of the qualitative characteristics of the different activities included in the AMPA review framework. For instance, the 39% completion rate that was calculated does not adequately value the review actions, nor does it describe the actions that are in progress. Additionally, it does not specify those actions that were discarded from the plan and the accompanying rationale for dropping them provided by managers. No plan that encompasses an extremely complex program and spans four years in a very dynamic organization, even a well-designed one, can be expected to be adhered to with 100% compliance. In fact, one manager remarked during his or her mid-implementation interview that there are "...problems of implementing

any plan, no matter how well-laid”.

In these mid-implementation interviews, managers independently revealed that their perspective on the plan was that it was a “guide” and “a road map” that was “invaluable” to them over the last two years. There is perhaps no stronger statement to support this overall observation than the statement of one manager who told the interviewer that without the implementation plan for reviewing AMPA, “[w]e would be in deep shit without [it]”.

In addition to reporting that their progress on the review of the program depended upon the presence of the framework, managers found themselves distributing it and using it as an educational tool and as the basis for the inaugural meetings of the stakeholder advisory committees for two of AMPA’s sub-programs, the APP and PPP (see Cuthbertson, 2000). Managers’ perceptions that the Review Branch fell short of its ability to keep AMPA’s management and staff on track in implementing the review plan appear only to have strengthened their own commitment to, and buy-in into, the plan. One manager spoke highly of the framework, observing that it “got everyone [in the AMPA unit] involved”; in another interview, a different manager made the observation that it “got everyone thinking”. The dedicated resources to hiring a manager and a staff member within the AMPA unit to oversee the remaining work on the review is additional (and fiscal) evidence of this continued commitment.

Another way to measure the success rate of the review framework for AMPA is to examine

in more detail the review actions (see Figures 4 and 5) that were carried through, and those that were not, two years after the framework was developed (see also Figure 6). Of particular importance are those actions that are at risk due to the short time-line remaining.

Three types of recommendations characterized the implementation plan. First, and in terms of monitoring AMPA, the performance indicators listed in Table 4 of Chapter 4 had been identified in the review framework as possible indicators for managers to consider in taking “pulse” readings of the APP, PPP and GPP (should the latter sub-program be activated). Performance indicators specifically for the APP and PPP also were posited in the review framework. Rather than starting with this list, a session held in March of 1999 with the purpose of drafting a more client-focused compilation of indicators began with a brainstorming exercise in which AMPA’s managers and staff came up with an exhaustive list of potential indicators. The list subsequently was culled down during the session to a practical number based upon access to this type of performance information and the cost of regularly monitoring in the identified areas. Many of the indicators that were selected by managers and staff at the brainstorming session appear in Table 4, but some others such as length of approval time for APP and PPP applications from producer organizations, number of Ministerial correspondence regarding the APP and PPP, and actual price for PPP commodities also were adopted.

As can be seen in both Figures 5 and 6, the next type of monitoring action specified in the framework was the drafting and distributing of semi-annual status reports to AMPA’s

various stakeholders. From the interviews it appears that, with the exception of the first scheduled occurrence in the agreed to implementation plan, this has taken place every six months in the two years after the plan was signed off by AMPA's management. The development of performance indicators undoubtedly assisted in providing regularly updated information to stakeholders of the program.

The second category of recommended actions in the implementation plan concerned management actions or outreach. Of the five review activities agreed to by AMPA's management, only one – the consolidation of AMPA's files and data into a Management Information System (MIS) – was completed at the time of the mid-implementation interviews. Again, the mutual influence or complementarity of being able to access information from one place, the MIS, reinforced managers' ability to access performance information and communicate it to AMPA's stakeholders in semi-annual status reports.

One of the activities contained in the implementation plan that was dropped outright was the legal assessment of AMPA's risks and liabilities. Although one of the managers interviewed mentioned that "limited communication" with Legal Services¹³² had taken place, "competing" actions were perceived as more necessary to the review such that resources were committed to these other review-related activities. Given the current focus on risk-based management in the federal public service (Privy Council Office, 2000a; Müller-Clemm

¹³² Legal Services is the AAFC Branch with whom AMPA's management would have to liaise to carry out the legal assessment specified in the implementation plan.

& Lywak, 1999), this decision may have consequences for AAFC's liability in the future¹³³.

Because the legal assessment had not been scoped before being discarded from the framework, it is impossible to accurately gauge the potential ramifications of this decision.

This, therefore, remains a corporate risk for AAFC.

A second implementation action that was explicitly not followed through on by managers was the generation of default or loss-ratio targets related to the APP. The consequences of this, however, are less likely to be serious given that managers did report initiating discussions with lenders on what appropriate targets might be. That is, some information on appropriate targets was gathered by managers. The two remaining implementation actions related to managing AMPA, by contrast, were already underway two years into the agreed to implementation plan. These included: A consultant having been hired to write a "think-piece" paper and distribute it to stakeholders, and another consultant being retained to organize and facilitate two separate advisory groups, one for the APP, and the other for the PPP. Both these review-related actions may indicate progress in implementing the review framework for AMPA¹³⁴, and suggest that it may be completed within the next 12 months¹³⁵.

¹³³ As argued in Chapter 4, determining AMPA's vulnerability to litigation expands the scope of risk management for AAFC, and is particularly relevant with the contractual obligations, third-party delivery (i.e., by producer organizations) of the program, and potential for non-compliance by producers (see also Arthur Andersen, 1994).

¹³⁴ A greater indication of progress, of course, would have been the inclusion of program stakeholders much earlier in the implementation of the review framework.

¹³⁵ As stated previously in the section, the completed framework did not include the discarded review actions (i.e., the legal assessment of AMPA and establishment of the default / loss ratio targets mentioned so far). Also dropped was the assessment of management systems which will be re-introduced shortly.

The third type of recommendation in the review framework for AMPA is the actual evaluation of the program¹³⁶. As intimated previously in the chapter, the review framework for AMPA comprises the focus of the two advisory group meetings (Cuthbertson, 2000). That is, the consultant hired to facilitate the meeting has prepared a discussion document synthesizing the framework and will structure meetings with the APP and PPP advisory group members to gain insight as to how best to follow up with the evaluation of the two sub-programs, including surveying producers who use the APP and PPP, and interviewing other stakeholders.

Yet from the mid-implementation interviews with managers, it seems as though some difficult questions about the APP already have been answered (see below). In the spring of 1999, a consultant was hired by the Review Branch to perform a case study analysis on that sub-program as indicated in the agreed to implementation. In fact, the consultant relied on economic analyses to make conclusions about the APP, thereby merging the two actions – case study and economic analysis – into one study, and determined, among other things, that:

- The APP is achieving most of its objectives (as evidenced by its expected outcomes);
- Cash advances reduce financial pressures to sell crops before crop prices have peaked;
- The APP can improve producers' liquidity, profitability, and long-term viability; and

¹³⁶ Figure 5 depicts conducting an economic analysis study, interviewing stakeholders, surveying producers, studying producers' access to credit, assessing AMPA's management systems, and carrying out case study analyses as suggested components of the evaluation.

- **Producer organizations who deliver the APP are able to borrow money from lenders at lower interest rates (Cuthbertson, 2000).**

As one manager indicated during the mid-implementation interviews, the analysis was used to draw conclusions about the objectives of APP, and was used in a safety net review for some other programs offered by AAFC. The analysis also provided evidence on the extent to which the APP was achieving results or outcomes, a significant accomplishment when dealing with a program attempting to facilitate a complex process such as orderly marketing (see Chapter 3).

Although the access to credit study, another action specified in the review methodology's implementation plan, was not carried out two years after the plan had been prepared, the last finding that was highlighted in the combined case / economic analysis study indicates that producer organizations do experience better rates in receiving credit from financial institutions, even though such access specifically has not been probed.

Assessing AMPA's management systems, like the assessment of the program's legal risks, was a component of the evaluation actions dropped by managers from the agreed to implementation plan. Apart from these two activities, and based upon the information provided by managers during the mid-implementation interviews, it is reasonable to conclude that almost all of the plan will be initiated in the next 12 months. It would be speculation to say that all of this 77% (i.e., 10 of 13 actions) of the plan would be completed as work of high quality, but the components of the plan undertaken so far have been able to inform

necessary and complementary review information thereby aiding the legislated review of AMPA.

The subject of the legislated review of the program is examined in greater detail in the third part of the dissertation, as the *ad hoc* legal analysis reported upon in Chapter 6 is based on a mandatory review clause contained in the *Agricultural Marketing Programs Act*. The clause serves as a clue for further investigation into Parliamentarians' expectations for program performance information. Indeed, as I conclude in Chapter 7, the rationale for the inclusion of this type of clause in the *Act* reveals some key insights into the contemporary practice of evaluation. My *ad hoc* research and results, and the strengths and weaknesses of all of the methods used in the dissertation, are profiled in the following chapter.

CHAPTER 6: WHY MANDATED REVIEW?

The subject of this chapter centers on the significance of mandated evaluation, and features *ad hoc* research that was carried out to explore the reasoning behind the appearance of a mandatory review clause in the *Agricultural Marketing Programs Act*. The chapter starts out with an examination of these clauses which are, in essence, statutory mandated evaluation, and make the distinction between them and administrative review clauses, given that both types are sometimes present in government statutes (as they are in the *Act*). The chapter continues with five general explanations for mandatory review clauses to be in legislation in the first place, and concludes with the proposition – made by consulting the available evidence¹³⁷ – that the intention behind specifying a review of AMPA was to deflect attention away from its trade-distorting implications. Because the chapter concludes all three phases of my research, it ends with a consideration of the strengths and limitations associated with the methods used in the dissertation.

6.0 Review Clauses: Statutorily Mandated Evaluation

In the vast majority of cases, the evaluation of government programs has been initiated by an administrative directive either from senior departmental staff; the Minister of the department; or, periodically, from the TBS. However, the review of AMPA was mandated under Section 42 of the *Agricultural Marketing Programs Act* as follows:

During the fifth year after this Act is assented to, the Minister must review the provisions and operation of this Act in consultation with the Minister of

¹³⁷ The robustness of this evidence is addressed later in the chapter.

Finance.

Review clauses are statutory instruments that provide for a window usually of three to five years to allow future examination of the *Act* in action and/or the program(s) contained in the legislation. To appreciate the significance of the mandatory review clause present in the *Act*, it is important first to understand the difference between this kind of clause and an administrative one, as the *Act* features both.

Administrative Versus Mandatory Review Clauses

For some time it has been very common for federal statutes to include what can be termed an *administrative* review clause calling for the preparation of an annual report on the operation of the statute or the statutory program. The usual provision indicates that a report is to be prepared by the relevant authority, typically the Minister, and be tabled in one of the Houses of Parliament (with the expectation that it will be referred to the appropriate Standing Committee for consideration¹³⁸). The *Agricultural Marketing Programs Act* contains such a clause. Section 41 provides that:

At the end of each fiscal year, the Minister [of AAFC] must prepare a report on the administration of this Act, including agreements made under it, and must have the report laid before each House of Parliament.

While such a clause anticipates that Parliament (or the appropriate Parliamentary Standing Committee) will conduct a review of the program, the nature of the report principally is

¹³⁸ The role of Standing Committees is referred to later in the chapter.

informative as opposed to evaluative, and necessarily general in the spirit of ongoing monitoring. By contrast, a *mandatory* review clause such as the one found in Section 42 of the *Act* contemplates a much broader and more significant review of the program; one which involves an evaluation of its overall effectiveness and may include recommendations for legislative change. This view is supported by the reference in Section 42 to a review of "the provisions and the operation" of the *Act*.¹³⁹

Unlike administrative review clauses, mandatory ones in federal legislation are a relatively recent phenomenon. The first appearance of a mandatory review clause in federal legislation occurred in 1982 with the enactment of the *Access to Information Act*¹⁴⁰ (Tardi, 2000). Importantly, the presence of these clauses is unusual. Since 1982, with the exception of the *Agricultural Marketing Programs Act*, there have been only two other federal statutes which have included a mandatory review clause: The *Canadian Security Intelligence Service Act*¹⁴¹ in 1985 and the *Bank Act*¹⁴² in 1991. In the case of both the *Access to Information Act* and the *Canadian Security Intelligence Service Act*, the wording of the mandatory review clause is similar to that found in *Agricultural Marketing Programs Act* in that it required a review of the "provisions and operations" of the respective statutes¹⁴³. The clause in the *Bank Act*

¹³⁹ Support for this notion of a much more extensive review may also be found in the warning offered by the Privy Council Office (1999a) that "caution should be taken when considering to include ... a provision for mandatory review of [an] Act within a particular time." [p.4]

¹⁴⁰ Stat. Can. 1982, c.111, s.75.

¹⁴¹ Stat. Can. 1984, c.21, s.69.

¹⁴² Stat. Can. 1991, c. 46, s. 21.

¹⁴³ Both of the mandatory review clauses in these statutes go on to express that the report shall include a statement of recommended changes to the legislation in question.

is intended to note that this type of clause was designed to serve as a tool for "pulse taking" or monitoring, as well as act as a public administration mechanism which would enable the updating of banking practices due to developments in the field of financial services (Keyes, 2000; Tardi, 2000)¹⁴⁴.

The preceding paragraphs, however, shed no light on why mandatory review clauses appear in some statutes and not others. Five explanations, including the one that likely led to the inclusion of this type of clause in the *Agricultural Marketing Programs Act*, are my next topic.

6.1 Five Explanations for the Presence of Mandatory Review Clauses

It is possible to identify functional, enforcement considerations, accountability, public participation, and political context reasons for the presence of mandatory review clauses generally (Kilcoyne, 2000). After introducing every explanation, the likelihood that each is responsible for the appearance of the clause in the legislation which governs AMPA is conveyed. After citing comments made by Members of Parliament (MPs) in the House of Commons up to a year before the *Agricultural Marketing Programs Act* was enacted, the political context (i.e., the government's concern over relations with its trading partners) emerges as the most likely explanation for the clause in the program's legislation¹⁴⁵.

¹⁴⁴ The *Bank Act* has been praised by Parliament, and two reviews have been done since the legislation was enacted.

¹⁴⁵ The evidence supporting this assertion sheds light on Parliamentarians' motivation for specifying a review of AMPA no more than five years after the *Agricultural Marketing Programs Act* was enacted in 1997. This point is analyzed more thoroughly later in the chapter and in Chapter 7.

1) Functional

The first possible explanation may be the most apparent one; namely, mandatory review clauses are included in some statutes and not others in an effort to ensure that the statutory scheme is functioning well. The clauses provide formal notice to those responsible for the implementation and administration of an initiative that it will be assessed within the designated time frame. Thus if difficulties in program implementation or administration arise, notice is given that there will be a window of opportunity for legislative corrections to be made. Such corrections could include amendment or even repeal of the statute / law.

The major difficulty with this explanation is that it does not explain why legislative direction is required to initiate review, and it is here that the distinction between administrative and mandatory review clauses is critical. Given that a review of a statutory scheme may be *administratively* imposed at any time at the direction of senior civil servants, the Minister, Cabinet, or the TBS – not to mention the fact that legislative corrections can occur on an as-needed basis – it is unclear why the government also would opt for a statutory requirement in the *Agricultural Marketing Programs Act*. Nothing about AMPA's past history (see Chapter 3) or present context indicate that senior civil servants, the Minister, Cabinet, or the TBS require legislative authority rather than their own directive powers to initiate a review of AMPA. Indeed, and as present in the mid-implementation findings, the developments and support of senior managers within AAFC have a great deal of influence on the extent to which a review of a program is carried out (i.e., implemented) on schedule.

2) Enforcement Considerations

A second possibility is that the inclusion of a mandatory review clause in the *Act* represents an attempt to respond to enforcement concerns. While it is true that the administrative direction to implement a review of a program could be enforced through employment sanctions, this presupposes that senior departmental decision makers endorse the need for review. To the extent that program evaluation has been promoted by the TBS, there may have been the sense in the early 1980s that this central agency did not have sufficient clout to get government departments and agencies to conduct effective program evaluation.

Underlying this explanation is the reality that different legal consequences flow from an administrative, as opposed to a legislative, review requirement. With the former, only the employer has the authority to enforce the direction; no other person would have standing to do so. If the TBS were unsuccessful in convincing senior decision makers to enforce calls for program evaluation, it has no other options. However, where the obligation is statutorily based, the TBS would have a coercive instrument in dealing with a recalcitrant civil service. Indeed, while the application may be absurd, this distinction is well-illustrated by the fact that the failure to comply with a statutory obligation is a criminal offence under Section 126 of the *Criminal Code of Canada*, punishable by imprisonment for up to two years.

The problem with this second explanation is that there is very little support for it. Although the appearance of mandatory review clauses coincides with an increasing emphasis by the TBS on program evaluation in past years, there is no evidence to suggest that the directives

of the TBS were ineffective. On the contrary, the fact that there has been considerable growth in evaluation in Canada during the past two decades suggests that the TBS's directives have been followed to a large extent (Müller-Clemm & Barnes, 1997)¹⁴⁶.

It is worth noting an additional point here. By elevating a review to the status of legal obligation, mandatory review clauses may be enforced by members of the public who have a sufficient legal interest in seeing that the statutory obligation is discharged. In this sense the law is binding on the government itself. For example, if subsequent to the enactment of the *Canadian Security and Intelligence Service Act*, the federal government had decided that it did not want to undertake the mandated review of this statute, it is likely that a court order could have been obtained by any member of the public compelling it do so. However, while this reveals the legal consequences that flow from enacting a mandatory review clause, it does not provide an explanation as to why a government would want to potentially constrain itself in this manner.

3) Accountability

A third potential explanation for the presence of a mandatory review clause is that it demonstrates the government's commitment to public accountability. Without this type of clause in place, where is the assurance – members of the public may ask – that legislative programs are operating efficiently and effectively? This explanation parallels my earlier discussion. Just as growing public concerns over the size and efficiency of government in

¹⁴⁶ This topic is considered more extensively Chapter 2.

the 1980s prompted increased interest in program evaluation generally, it may also have prompted the federal government to make the commitment to such evaluation "more public".

However, a mandatory review clause is not necessary to provide the public with some assurance of the efficiency of AMPA. The administrative review clause in the *Act* ensures that AMPA's finances appear annually in AAFC's *Departmental Performance Report* (i.e., Part III of its *Main Estimates*¹⁴⁷). In that regard the program is assessed in terms of its finances, and the very public nature of this reporting mechanism suggests that corrective steps will be taken, if necessary. Besides, it is not clear that the mandatory review clause in AMPA's legislation would be there to serve the public or the producer organizations which make up the powerful, vocal, and well-established farm lobby.

4) Public Participation

In a related sense, mandatory review clauses also may be intended to provide an opportunity for members of the public or other interested stakeholders (e.g., producer organizations) to participate in the assessment and revision of a given program. This explanation finds partial support in the observation by Keyes (2000) that the concept of mandatory review of legislation in Canada first emerged in relation to what is known as *subordinate legislation*¹⁴⁸.

¹⁴⁷ A component of the Expenditure Management System (EMS), Part III of the *Estimates* – composed of the *Departmental Performance Report* and *Report on Plans and Priorities* – annually are tabled in Parliament each fall and spring, respectively. The EMS, introduced in Chapter 2 and elaborated upon in Chapter 7, particularly its role in providing information on the performance of governmental programs.

¹⁴⁸ Subordinate legislation, or what also is known as statutory instruments, refers to legislation which is made by a body other than Parliament. Whereas the most common form of subordinate legislation is regulations, this term also includes orders, rules, and warrants. The law-making power of subordinate legislation may be granted to any person or body, but the most common body to receive this law-making

By way of background, when Parliament decides to establish a new program or regulatory scheme which requires lawful authority, it has options in terms of legislative form. That is, it can enact a statute which typically involves the:

- Preparation of a proposal document within the policy and planning division of a government department;
- Cabinet approval of the initiative;
- Drafting of a bill by lawyers within the Department of Justice;
- Introduction of a bill into the House by the sponsoring Minister; and
- Passage through both Houses of Parliament, and finally royal assent by the Governor-General.

Alternatively, assuming that there is statutory authority, the government may opt to rely upon subordinate legislation – of which regulations are the most common form – to enact legal rules. Reliance upon subordinate legislation requires that there be a statute containing an *enabling clause* which delegates law making authority. The most common form of enabling clause in federal legislation is that which authorizes Cabinet to make regulations. Where such authority exists, the process involved in enacting a regulation typically includes the preparation of the text of the regulation within a government department, usually a regulatory impact assessment; the execution of the regulation by two federal Ministers and the Governor-General; and the filing and publication of the regulation in accordance with the

power is the Governor in Council (i.e., the federal Cabinet). The essential point here is that the authority to enact subordinate legislation must be granted under statute; there is no inherent authority to make subordinate legislation.

Statutory Instruments Act (Can).

While there are a number of advantages to subordinate legislation, the major one is speed of enactment. It will take a minimum of 12 months – and often as much as 24 months – to enact a statute, but a regulation can be made in a matter of months, if not days. This temporal advantage of regulations was particularly significant in the post-World War II period which witnessed a tremendous growth in the government's regulation of a wide array of social and economic activities. Accordingly, one of the most salient features of Canadian legal landscape in the mid- to late-20th century has been the steady displacement of statutes by subordinate legislation as the preferred method of law-making.

However, reliance on subordinate legislation has triggered increasing concerns over the past two decades. While many of these concerns have centered around the so-called undemocratic nature of the enactment process, more significant concerns have found expression under the heading of *deregulation* (Keyes, 1992). It has been argued that the very ease of enactment has led to an excessive reliance on legal regulation, particularly in the commercial realm. The alleged results include the enactment of legislation which is misplaced or misinformed, and in many cases counter-productive.

A number of remedial measures have been proposed, but the most common are known as *notice and comment initiatives*. And although the precise measures vary between jurisdictions, the common theme here is that governments should provide advance notice of

an intent to enact or amend subordinate legislation, and provide those individuals who will be affected by them the opportunity to comment on their advisability and suitability. In short, the process of law-making by subordinate legislation should become more transparent and more participatory (Treasury Board Secretariat, 1993).

It is in this context that mandatory review clauses first appeared. These clauses required persons responsible for the enactment of subordinate legislation to undertake periodic reviews of their legislation with a view of assessing its effectiveness. More importantly, such persons were expected to do so in conjunction with notice and comment procedures whereby interested or affected parties would be able to participate in the review process.

That is, mandatory review clauses in a statute represent a mechanism whereby interested parties may raise implementation or operational concerns early in the life of a statuted program or initiative and also ensure that these same parties are involved in the review process. This fourth explanation is no better than the previous three in serving as the cause for the presence of the mandatory review clause in the *Agricultural Marketing Programs Act*. To elucidate, AMPA was consolidated from precursor programs according to the feedback that the Branch responsible for administering the program received from its stakeholders during a series of consultations held between 1995 and 1996¹⁴⁹. In this case, a history of willingness to carry out extensive consultations for program improvement can be demonstrated.

¹⁴⁹ More information on these consultations is provided in Chapter 3.

There is one final explanation that is possible for the appearance of a mandatory review clause in the *Act*, however, and unlike the others in this section it can be supported by uncovered evidence. Admittedly this evidence is not as robust as it could be: Stronger evidence would require access to confidential information; that is, Memoranda to Cabinet and other relevant materials classified could serve as another source of information, but confidentiality provisions do not allow citations or references to be made to these documents. Still, the following commentary may be considered indicative of the rationale behind the particular reference to review that the legislation of AMPA contains¹⁵⁰.

5) Political Context

A political context explanation emerges out of the suggestion by Tardi (1992) linking the presence of mandatory review clauses and controversy surrounding the legislation itself at its development stage. In support of this proposition, Tardi notes that the *Access to Information Act* (1982) and the *Canadian Security Intelligence Service Act* (1985) both generated a significant amount of political debate and contestation at the time of their enactment. Mandatory review clauses, or similar wording in the legislation, could conceivably serve to deflect the controversy.

Proponents of a political context explanation would suggest that mandatory review clauses offer governments a mechanism to secure support of the public, or even of individuals, when

¹⁵⁰ As seen in the next chapter, if the motivation behind reviews cannot be disclosed and/or confirmed, the efficacy of products prepared by practitioners of evaluation and review may be called into question, particularly in the attempt to meet Parliamentarians' needs.

legislating with respect to a contentious issue. For instance, where the legislative response represents a compromise between competing positions, the prospect of a mandatory review provides at least some solace to persons who are disappointed with the legislation that the issue will be re-visited and that they will have another opportunity to express their concerns. The rationale behind including these clauses in legislation, then, may be to attain and maintain additional political support – or at least diminished opposition – from various factions with strong views on a given statutory proposal.

The few sources of evidence accessible and available (e.g., Tardi, 2000; Government Orders, 1997; Government Orders, 1996) suggest that the political context appears to be the best explanation among the total of five that have been put forward in this section. As noted in Chapter 3, the *Agricultural Marketing Programs Act* came about as a consolidation of a number of pre-existing statutes. It could be viewed as little more than a legislative housekeeping measure and thus not especially controversial. From a vantage point that includes trade considerations, by contrast, the creation of the *Act* as it exists today appears more politically charged. The evidence supporting this fifth explanation is presented next.

6.2 Available Evidence Supporting the Political Context Explanation

Tardi (2000) notes that prior to its enactment, the World Trade Organization (WTO) had rendered a decision against Canada in connection with income support and stabilization measures for agricultural producers. Accordingly, the purpose of the clause may be interpreted as a measure to assure the WTO and Canada's trading partners that the *Act* would

be reviewed in five years, and that potentially trade-distorting impacts would be detected and corrected.

In addition to Tardi's supposition, other sources indicate that concerns over trade led to the inclusion of a mandatory review clause in the *Act*, thereby buying the government time. The evidence that follows comes from an electronic search of the Hansard record of House of Commons debates¹⁵¹. Nine entries spanning a year from 1996 and 1997 (i.e., in the 12 or so months preceding the enactment of Bill C-34), representing hundreds of pages of transcripts, appeared as a result of the search. It must be recognized, however, that other existing government documentation may affirm, or conversely contradict, this contention. Thus, while it is not possible to support this position with certainty, it will become apparent the comments of opposition MPs reflected in the transcripts suggest that some Parliamentarians were well aware of the link between AMPA and trade negotiations¹⁵².

One Reform MP (Government Orders, 1996), had much to say about the *Agricultural Marketing Programs Act* governing the program and the government's intentions in the House a year before it was enacted. He states:

The Liberal government opposed NAFTA [North American Free Trade Agreement] prior to the election. It actually goes all the way back to the 1988

¹⁵¹ The search was made at the Government of Canada's Parliamentary website, the URL of which is http://www.parl.gc.ca/35/2/parlbus/chambus/house/debates/indexe/a-35-2_3-e.html/. The keyword entered for the search was "AMPA".

¹⁵² Interestingly, it is the remarks of non-governmental MPs which are the most revealing in this regard.

election. Liberals said that NAFTA was a terrible deal and should not be signed. The Liberals said that if they ever got into power they would certainly fix NAFTA in a big hurry. That was their number one priority, a priority far greater than tinkering around with the advance payments act.

The Liberals finally got into power in 1993, but they totally forgot their promise to change NAFTA. They did not even go back to the table to renegotiate NAFTA like they said they would. Instead they went to the GATT [General Agreement on Trade and Tariffs] table and broke another promise. They did away with article XI of GATT. They indicated to the supply managed industry that they would not do that but they did it anyway.

The supply managed industries are wondering whether Bill C-34 might be a diversionary tactic to get producers' eyes off some of the problems and uncertainties facing the supply managed industry.

The Liberals even failed when they signed the GATT agreement to table an addendum to GATT indicating what their position was on the tariffs which had been agreed to as they regarded NAFTA. It certainly looks like a bit of a slip-up to me.

Now we have a U.S. challenge to our tariffs under NAFTA which is going before a dispute settlement panel. We expect the results to be tabled sometime in August. That is a far more important issue to producers. They would like to see the government acting on that rather than on this issue (at 1730).

Another Reform MP presents a similar position in the House a year later during discussion on the *Act* (Government Orders, 1997). He notes:

The Liberal government elected in 1993...was isolated at the GATT discussions in Geneva along with Japan and Korea. I believe it was a deliberate move. It could go there to argue that it would not give in to anybody else and that it would keep border closures. However [the government] knew all along that it could not win the argument. It looked good at home politically but it knew it would be hit with tariffs, which is exactly what happened...We have a built in agenda for work on the second phase of agriculture that will take place at the World Trade Organization in 1999. There is a working agenda. The Canadian government is playing the same game this time. It is playing the game of knowing there will be massive reductions in the tariffs on supply management. It knows that state trading enterprises such as the Canadian Wheat Board will be reviewed. It is not just on the agenda for Canada. It is on the agenda for a number of member countries such as the United States. These issues will be raised during the talks (at 1315).

Comments from government MPs in the House in both 1996 and 1997, by contrast, laud the benefits of the then-proposed *Act*, and cite the industry-wide consultations that AAFC carried out (see Chapter 3). Trade does not appear in the government's recorded statements. The absence, perhaps, speaks louder than words.

The first Reform Party MP quoted above finds the likely interpretation for this lack of transparent dialogue on trade indicative of the government masking its true intentions (Government Orders, 1996). He intones:

It is obvious this is not the most controversial piece of legislation facing the House. The fact that the introductory speech by the government side was made by the parliamentary secretary to the minister rather than by the minister indicates this is not an earth shattering change in legislation that will impact on agriculture.

Rather than being controversial *a better word for this bill may be that it is diversionary*. It is trying to divert attention from some shortcomings of the minister of agriculture and his government on to ground that it is less controversial and may find broader support from the industry (at 1725, emphasis added).

Finally, only one reference to the part of the *Agricultural Marketing Programs Act* that mentions the mandatory review clause could be located. The remarks come from a third Reform MP (Government Orders, 1997), who informs the House:

The new act also provides for the recovery of administrative costs, creates offences, requires reports to Parliament and makes consequential amendments to other acts. There will be a mandatory legislative review of the act five years following enactment, which is a good idea for all legislation (at 1140).

If the government's real intention for the review of AMPA was to buy time with its international trading partners, an interesting and related point emerges. The mandatory review clause in the *Act* also defers a confrontation with members of the agriculture and agri-food sector at the time of enactment in 1997, and serves to give notice to producers and producer organizations in the agriculture and agri-food sector that the potentially trade-distorting subsidies available to them under the *Act* may be diminished or abolished completely within five years' time¹⁵³. Thus the clause may have been orchestrated also to signal a potential phasing out of AMPA, and therefore provide producers with an opportunity to make the necessary economic adjustments associated with the elimination of the program¹⁵⁴.

As can be gleaned from the results of this *ad hoc* research, exploring the rationale behind the impetus for review is no easy task, even when a mandatory review clause in the *Act* provides a clue. In short, without knowing the motivation of the ultimate clients of the review, Parliamentarians¹⁵⁵, the practitioner carrying out her or his work in real-world

¹⁵³ Interestingly, one manager in the mid-implementation interviews stated that "...there is some discussion about the relevance or appropriateness of having AMPA as a distinct program rather than incorporating or integrating its important features into another, larger set of programs. Consequently, AMPA may disappear as AMPA".

¹⁵⁴ Still, the language used in Section 42 leaves much to be desired. The wording of this Section may be contrasted with a Section of the *B.C. Regulatory Impact Statement Act* (S.B.C. 2000, c.19) which is designed to ensure that regulation making authorities consider the impact of existing and proposed regulations on business. The Section on sunset provision and review reads "6(1) This *Act* is repealed on April 30 following the day that is 4 years from the day on which this *Act* comes into force [and] 6(2) At least 6 months before the day this *Act* is to be repealed, the government must initiate a review process to determine whether this *Act* should be re-enacted, and what changes, if any, should be made". As alluded to in Chapter 1, the stronger connotation of the term *sunset* is commented on by Dobell (2001).

¹⁵⁵ At first the client of the AMPA review framework was regarded to be, most directly, program managers and staff, and senior AAFC managers. Less directly, program clients (i.e., producers, producer organizations, and the CWB) were considered. The limitations of the initial perspective is addressed in the

settings faces uncertainty at the outset.

This subject is a prominent one in the final chapter of my dissertation. Before turning to the conclusions and implications of my research, this chapter finishes off with a consideration of the strengths and limitations of the methods used to carry out the research.

6.3 The Strengths and Limitations of My Research

Prior to focussing on any one method or phase of research, the use of qualitative data analysis, rather than quantitative data analysis, must be addressed in a general sense. The debate in some disciplines (e.g., psychology) and fields (e.g., evaluation) over the relative appropriateness of either method is ongoing and often vociferously expressed¹⁵⁶ (in psychology, see Kroger & Wood, 1998, and Danziger, 1991; in evaluation, Patton, 1990, Shadish et al., 1991, Mertens, 1999, Mark et al., 1999, and Bellehumeur, 1999).

This debate, of course, is housed in a much larger domain; namely, the researcher's role as purveyor of information (i.e., her or his research findings). In writing specifically about evaluation, Mertens (1999) sets an impressive target by stating that:

[Less traditional] scholars assume that knowledge is *not neutral*, but is influenced by human interests, that all knowledge reflects the power and

final chapter of the dissertation, and at the same time the difficulties in determining, and providing, what Parliamentarians expect, need, and want from reviews is discussed.

¹⁵⁶ Specific to evaluation, Julnes et al. (1998) suggest that a "paradigm war" has taken place in the literature among proponents of qualitative and quantitative methods (p. 484).

social relationships within society, and that an important purpose of knowledge construction is to help improve society (p. 4, emphasis added).

Not surprisingly, Mertens also cautions evaluators against over-relying on the logical positivism, or reduction of information into quantitative components, that has gripped most methods in the scientific paradigm.

The work of Danziger (1991) and Kroger and Wood (1998) provides compelling insight into the related debate within the discipline of psychology; that of the utilization of quantitative versus qualitative (or the utilization of quantitative *and* qualitative) methods. Importantly, one of the obstacles to employing a qualitative analysis of data, given the predilection of mainstream social scientific researchers for quantitative research, is that the onus is on the researcher using qualitative methods to defend that choice while convincing the reader that a “qualitative methodology [is not] unsystematic and unsupported interpretation” (p. 277), and can, in fact, be scientific and empirical.

First and foremost in my consideration of a qualitative method of analysis, were the participants in this research¹⁵⁷. It was my sense that creating a survey – which would be more amenable to quantitative analysis – and distributing it would not be well-received by prospective participants, particularly the AAFC senior managers who were knowledgeable

¹⁵⁷ Geva-May and Pal (1999) refer to the challenge of conducting research in an applied setting; they state, “[t]he risk of maintaining methodological purity, of course is the loss of influence” (p. 5). Mertens (1999) calls for a “...better balance...[for researchers / practitioners] to learn about and reflect on alternative paradigms and methods that are appropriate to [their] work” (p. 4).

about AMPA and who were well-suited to provide input into the research. Namely, a level of richness in the data that simply would not have been captured by quantitative means. The structured, face-to-face interviews that were employed in two of the three phases of research, by contrast, were more appropriate and more likely to garner greater participation and a higher response rate, particularly in light of Riessman's (1993) and Kroger and Wood's (1998) commentaries on the use of interviews in data gathering exercises.

Riessman makes two points relevant to the strengths of my selected methods of study: Firstly, in interviews¹⁵⁸ the act of translating knowing into telling – as opposed to knowing and writing, say, in survey responses – is more dynamic and realistic, and needs to be captured by the use of qualitative forms of data analysis. Indeed, by “talking and listening”, the researcher/interviewer and participant/interviewee “produce a narrative together” (p. 10).

Secondly, Reissman (1993) emphasizes that human agency and the more natural two-sided approach to communication are held more prominently in qualitative techniques of data collection and analysis. On the part of the person being interviewed, open-ended questions allow persons to use their own words instead of fitting their thoughts into researcher-inspired categories (thereby avoiding “forced-choice” responses to questions), and these words can be analysed thematically around their whole meaning as opposed to being reduced into

¹⁵⁸ An interesting aside is Kroger and Wood's (1998) assertion that the use of language, even among researchers who conduct discourse analysis, is far from arbitrary. An analysis of researchers' language, conducted by Kroger and Wood, determines that phrases employed depend upon the status of the interviewee. They write, “CEOs are said to ‘give interviews’ to social scientists, whereas students, victims and welfare recipients ‘are interviewed’” (p. 275).

smaller, abstracted parts (i.e., numbers). The use of probing questions and active listening to expand, clarify, or confirm information or facts similarly is beneficial to the researcher.

But agency also extends to the “listener, transcriber, analyst, and reader [of the reported findings]” (p. 15), as well. Riessman (1993) here touches upon another important issue in “qualitative vs. quantitative” debates; namely, the subjectivity of the researcher. She writes that researchers’ subjectivity is “deeply distrusted in mainstream social science” but that in personal narratives “it is precisely because of ...[researchers’] rootedness in time, place, and personal experience” (p. 5) that the information that they provide to their field of study can be valuable. Narratives and qualitative analysis, it is said, offer richer data in many areas of study, so long as one is willing to suspend complete adherence to absolute notions of objectivity.

Kroger and Wood (1998) outline the major assumption of discursive psychology which is that “the phenomena of interest in social and psychological research are constituted in and through discourse” (p. 269). In summing up decades of research into the history of psychology and methods used by psychological researchers, Kroger and Wood emphasise that the “the method [used] must suit the problem” (p. 267). They continue by indicating that the numerous subjects or topics studied by psychological researchers deserve “more subtle and varied approaches” than the traditional, reductionist collection of quantitative methods currently in use. In this regard, the characterization offered by Kroger and Wood – “the adoration of numbers, of quantification for its own sake” (p. 270) – says it all.

An increasing number of social scientific researchers in North America (e.g., Gallois & Pittam, 1995; Bavelas, 1995) and Europe (e.g., Riessman, 1993) are willing to accept that analysing language texts quantitatively loses the richness of the data contained within. The absolute certainty of seeing quantitative analysis and its reliance on statistics for most social scientific studies, has now become a thing of the past (see Potter and Wetherell, 1995), and a greater acceptance of the flexibility of qualitative research (Kroger & Wood, 1998) is gaining momentum.

In evaluation, this trend holds true, too. Mark et al. (1999) write that “[t]he goal of much qualitative [work] is to develop a rich description of the program, its context, and how it is viewed” (p. 181). Although the authors refer to the evaluation stage of a program, the same could be extended to the planning of an evaluation (i.e., developing a framework), as well as along all points in a program’s life cycle. Bellehumeur (1999), in promoting review, states that “[t]he review process itself...must take into account the data presented by participants” (p. 38). He goes on to argue that qualitative research methods encourage participation; the corollary being that the use of quantitative research methods may inhibit them. The most sensible response for researchers, in summary, is to select their methods – including qualitative ones, if appropriate – on a case-by-case basis. In the final analysis, all solid research should be driven by the research question, rather than the methodology.

To re-cap, then, the strengths of the forms of qualitative data collection and analysis that were used in the document and transcript reviews and interviews that comprised my three

phases of research are that they were:

- Best suited to the present context (i.e., phenomena of interest and research participants in this case study);
- A source of more in-depth and richer data than if quantitative methods had been selected;
- (In the case of the interviews) interactive and allowed verification of points with the research participants¹⁵⁹; and
- (In the case of the document and transcript reviews) an opportunity to build upon different types of perspectives and expertise.

But it is possible, in retrospect, to identify limitations with the methods used in the dissertation, as well. For the document review that took place in the pre-implementation research phase, one was limited to existing material most of which concerned not AMPA, but one or all of its precursor programs. In terms of the pre- and mid-implementation interviews, the results achieved relied on the types of questions posed in the two corresponding interview guides (see Appendices 4 and 5). It is possible that some of the questions asked of participants were not the right ones; that additional questions not included in the guides would have revealed different responses, for example. Finally, with the *ad hoc* research recounted earlier in the chapter, it was necessary to depend upon an electronic

¹⁵⁹ As indicated in Chapter 5, another strength of the mid-implementation interviews with program managers is that they were carried out with a third-party consultant, ensuring greater candor in managers' responses to questions about the efficacy of the review framework for AMPA in preparing for the review of the program.

search engine to identify any mention of AMPA in the hundreds of pages of House of Commons transcripts available on the internet. There is no way of verifying whether or not this search was exhaustive, except by employing a second researcher to conduct the same search manually. The fact that a researcher always is circumscribed by limited resources relates to all three phases of my research: With more time, money, and assistance, of course, a more comprehensive dissertation would have emerged.

Now that the strengths and limitations of my research have been discussed, the opportunity to re-visit the evaluation literature in order to identify the challenges facing public and private sector evaluators in the 21st century is provided. In the last dissertation chapter, the conclusions that resulted out of my data collection and analysis and their implications are presented.

CHAPTER 7: LESSONS LEARNED –**EVALUATION IN THE PUBLIC SERVICE CONTEXT**

In this final chapter of my dissertation, the conclusions and implications of three phases of research are provided. The major observation following from them is that, despite the best attempts of practitioners to assist federal government departments and agencies in preparing for program review, it is difficult to meet Parliamentarians' needs for legislated review because the expectations of these ultimate clients are not widely known. The case study of AMPA illustrates that the evaluation literature does not bridge the gap between reporting to Parliament requirements and the strengths of utilization-focused best practices which have emerged in recent years. Further, the dissertation indicates that even an examination of relevant legislation driving review practices, if present, is not sufficient: The wording of the mandatory review clause in the *Agricultural Marketing Programs Act*, after all, merely refers to the word *review* thereby side-stepping any hint at the real purpose behind the review. It was only after extensive analysis that it was discovered that the government considered the program to be potentially problematic on the trade front. Thus to facilitate a meaningful review, neither the evaluation literature, the appearance of a mandatory review clause in program legislation, nor the advice on performance reporting proposed by the Office of the Auditor General (2000) are enough.

The significant lesson resulting from the dissertation, then, is that government departments and agencies tasked with conducting reviews are unable to anticipate the real expectations of their ultimate clients for several reasons. Firstly, it is impractical from a resources

standpoint for evaluation and review practitioners to try and “fish” for this type of information. Secondly, Parliamentarians (e.g., Cabinet members) cannot be more specific in communicating their requirements for performance information for each review on a number of grounds, not the least of which is the conflict with the confidentiality surrounding contentious issues such as trade.

My findings demonstrate the difficulties that contemporary practitioners face in the absence of vital information which connotes a culture of secrecy in government deliberations. This represents a noteworthy gap between theory and practice present in the evaluation literature. The dissertation ends with some ideas for future research, and with my final thoughts.

The first section of the chapter, though, begins with the implications of all three phases of research carried out in this dissertation.

7.0 Implications of this Research

The following statement provided by Austin et. al (1982) makes program review and implementation all sound so simple: “Perhaps the most important question about any social program is, ‘Did it work?’”. But very quickly, one faces related questions – such as “Why / Why not?”, “In what way”, and “For whom?”. And even if these questions could be answered, the case study of AMPA indicates that the fundamental problem, by no means a unique one, is that Parliamentarians have commissioned work for something they know they do not need nor want. Conversely, they have established an unstated, unspecified

requirement for information now recognized as unattainable from a conventional review. The focus of improving upon existing evaluation tools as recounted in the first part of the dissertation (unintentionally) led to an acceptable product from either of these perspectives, but what of the public interest perspective?

This query is returned to later on in the chapter, but it is necessary here to acknowledge the best practices of the evaluation literature for it was from them that this dissertation research was initiated. Thirty years of research in the field of program evaluation does illuminate the willingness of evaluators to assist organizations in making improvements to achieve intended results and promote more efficient work (McIntire & Glaze, 1999). One of the strengths in the field has been the willingness of evaluators to recognize their limitations which has led to a flexibility in continually making methodological modifications to existing practices (Motuz, 1992; Helgason, 1999; Whitehead & Avison, 1999). Indeed, evaluation is a pragmatic, practice-driven field (Shadish et al., 1991). In the words of one commentator, it needs to remain so before it “become[s] rigid and inflexible, and... [is] seen as part of the problem rather than the solution” (Mayne, 1992, p. 22). As discussed in Chapter 2, the move toward rational evaluation utilization has held the interest of a number of influential evaluators in recent years.

Emphasis on the utilization of evaluation originally emerged with evaluators' observations that the implementation of evaluation findings, or the lack thereof, appeared to be a serious problem (e.g., Patton, 1990). In short, the evaluation literature offers many examples of

evaluation strategies, methodologies, reports, and their associated recommendations, being “shelved” due to their lack of utility. One approach taken to address this reality in the field was an increased focus on organizational behaviour; or, more precisely, the behaviour of persons with organizations.

Evaluators such as Albaek (1995, 1996) have examined the roles of people who populate organizations. These evaluation experts have proposed models and theories for how change occurs and for how decisions get made (or not) in these organizations. In advocating contingency theory, Albaek proposes that persons in organizations are motivated to make positive change, and even in the face of obstacles they are able to modify existing circumstances through actions such as developing contingency plans in order to overcome these obstacles and to improve the circumstances within which they work. Some speculative thoughts on the non-rational thought processes of individuals courtesy of social psychological researchers was presented, but contingency theory was the most comprehensive theory available to-date which linked evaluation and psychology literatures.

A second movement among some evaluators consistent with rational evaluation utilization involves increasing the involvement of stakeholders in evaluations; carrying out formative, rather than summative, evaluation work; and using more general review frameworks to plan evaluations. On the latter point, Patton (1990) advises practitioners that:

There is no universal standard that can be applied to choose among these different frameworks [that assist in preparing for program evaluation].

Quite the contrary, the diversity itself is a good indicator of the complexity of human phenomena and the challenges of conducting research (p. 89).

For in the end, as Rossi and Freeman (1993) write, evaluation's worth is acknowledged by the extent to which it is utilized. Research cited earlier in the dissertation (e.g., Cousins et al., 1996) indicates that evaluators, in practice, are not in the habit of employing strategies which follow what has been termed utilization-focused evaluation, despite often having very good intentions. Direct evidence for this position is provided in a study of over 500 evaluators in North America. In their research, Cousins et al. (1996) found a great deal of support for utilization-focused evaluation. Specifically, evaluators believed that "...the evaluator's primary function was to maximize intended use by intended users by making evaluations more responsive to stakeholders' needs" (p. 222). Yet Cousins and his colleagues' research reveals that the field of evaluation has a long way to go before it is able to get to a point where its practitioners want to be. In other words, what evaluators *are* doing – as opposed to what they feel they *should be* doing – are two different realities.

Another challenge is the lack of case studies and other monographs detailing the type of performance information that should emerge from program evaluations and reviews. Corbeil (1992) and Julnes et al. (1998) lament the substantial amount of ink that has spilled in supporting the debate over methodology in evaluation without any practical examples of application. What really is required in the literature, they argue, is a selection of case study examples like that provided by Framst (1995) for practitioners to choose from based upon

their unique needs and circumstances. Helgason (1999) expresses concern that evaluations tended to be academic or impractical exercises in providing paperwork and reports that always get shelved and hardly ever are read, except perhaps by the next wave of evaluators who re-visit the subject of a given program's performance. The original development of a review framework for AMPA was intended to respond to concerns such as these.

That work began by identifying numerous innovative approaches to evaluation available in the literature. From a compilation of these best practices, the intention was to proactively address some of the anticipated barriers facing program managers, as well as AAFC's senior managers, while readying the organization for the mandated review of AMPA. This entailed expanding the definition of evaluation by including it under the practice of review. As noted in Chapter 2, one key aspect of review is its emphasis on direct client participation (e.g., Bellehumeur, 1999), and this emphasis became a main aspect of the review framework for the program.

Such emphasis on fostering partnerships between evaluators and program managers and staff in developing the framework led to some progress in the implementation plan as assessed two years after the plan had been approved within the department. By situating review in the larger organizational context; identifying the key review questions; constructing a three-pronged strategy involving program monitoring, management outreach, and evaluation; and creating an implementation plan for the review of AMPA, a degree of management commitment to review was achieved. In summary, a utilization-focussed tool was created

that increased program managers' buy-in for the review function. Without a *practical* and *flexible* method for managers to use, there was little chance that a comprehensive review would be carried out. With an appropriate review framework, the commitment to see it through was strengthened.

The mid-implementation findings detailed in Chapter 5 served to empirically test the strategy laid out in the pre-implementation research phase, and indicate that this utilization-focussed review framework methodology succeeded in ensuring that at least one-third of its recommendations were carried out two years into the framework's agreed upon time frame.

Those review actions that were completed had:

- Provided a performance measurement or monitoring function;
- Communicated regular, six-month status reports to stakeholders;
- Served to further educate stakeholders about AMPA; and
- Tackled some difficult issues such as defining the outcomes of one of AMPA's programs, the APP.

Additionally, further elements of the plan have been initiated in the final year of the implementation plan. Managers' comments – made to a third-party interviewer not involved in the development of the review framework – were laudatory, and they indicated a great deal of buy-in for the review process as a result of the framework and its client-friendly processes (e.g., facilitation of performance measurement session) and outputs (e.g., implementation plan). But there are reservations, and these are triggered by recent observations of the OAG.

To understand the 2000 OAG audit of reporting on performance information to Parliament in a broader context, it is important to turn again to the Part III of the *Estimates* documents introduced in Chapter 2. After five years of priority-setting and performance reporting on the part of federal departments and agencies, last year the OAG made some conclusions on the *Estimates* as a vehicle for reporting to Parliament. While emphasizing that reporting to Parliament on the performance of the federal government is necessary, the OAG insists that:

[M]embers of Parliament need information on what Canadians are getting for their taxes in order to hold the government to account. Good performance reporting has become an essential part of modern democratic systems (Office of the Auditor General, 2000, at 19.1).

Upon examining the *Estimates* documents of 47 departments and agencies in its audit – some of which were pilot departments – the OAG summed up the government’s performance by stating that “[f]ederal departments and agencies have made some progress in reporting on their performance to Parliament, but [it is] disappointed at its present pace” (at 19.1).

But the OAG stopped short of providing fulsome solutions to problems involved in performance reporting. That is, the information needs of Parliament are inextricably enmeshed with the political realities of the time. Parliamentarians’ needs include the political perspective on performance information, as well as perspectives of stakeholders and others, not to mention the perspective from a management operations standpoint. What is

required, then, is an integrative, deliberative synthesis of these various points of view.

Unfortunately, the best practices from utilization-focussed literature do not get us there.

Moreover, a systemic failure may be identified because there is no way for an review officer, in particular, or the public service, in general, to know what sort of performance information Parliament *really* wants or can utilize. In the culture of secrecy referred to earlier in the chapter, one can see that there is even less chance for identifying what Cabinet wants or can use.

Some final commentary returns to this observation in the last pages of the dissertation. In the next section, however, the lessons learned throughout the data collection and analysis stages are chronicled. Ideas for future research are presented, and some final thoughts conclude the dissertation.

7.1 Lessons Learned

Social research is an iterative process. One of the advantages of conducting research in an applied setting is that it ranks high on what social scientists have termed ecological validity; that is, the concepts presented in applied research have the opportunity to be tested “in the field” rather than in more artificial laboratory settings. The test, therefore, is one of application, or applying concepts created from the literature rather than an attempt to control a dynamic environment.

The literature concerning the design of review frameworks presupposes that these are tools to assist program managers in their task of reviewing their program. Thus the framework for AMPA was constructed to benefit the most direct clients of the review: The program's managers and staff; AAFC's management; and to a lesser extent the program stakeholders, including producers and the organizations which represent them.

The apparent buy-in for the framework within the AMPA unit is a sign of the framework's success in meeting the goal of constructing a utilization-friendly instrument. Not only did managers unequivocally state that they had felt part of the review process over the first two years, but they continued to make progress in keeping the momentum for various review activities specified in the framework's implementation plan. Contrary to what one might expect, organizational pressures did not result in the abandonment of the framework. As one manager noted, the implementation plan provided in the review framework:

...[G]enerally [is] very useful. It has helped a lot to keep everyone [in the AMPA unit] focused on the review questions, purpose, and timeframes. It gives us a good reference and horizon.

As reported in Chapter 5, such sentiments were expressed by the three other managers, as well.

Although in retrospect this choice may have come at the expense of better serving the ultimate clients of the review of AMPA (i.e., Parliamentarians), it would be short-sighted not to recognize that the process of preparing for the review of the program furthered the cause

of review in the AMPA unit. While the end product may not have had its ultimate purpose in mind in the end, it is reasonable to assume that positive “carry-over” effects from participation in the review process; that is, staff and managers now are better positioned to incorporate evaluative judgment into their daily operations.

Also in hindsight, one can see that this problem of different potential users or clients with distinct needs is not new. In addition to supporting the position that “[a]lliances between managers and review professionals can be valuable” (p. 8), for example, the TBS’s *Review Policy* of 1995 asserts that:

The various clients of review also have different concerns and information needs. The type of information required by a line manager to manage risks and run his or her program and operations in a cost-effective manner differs from *the type of information required by Parliament to hold the government accountable or by Cabinet to determine whether or not government-wide priorities are being addressed effectively*. Thus, it is important that the issues addressed and the mechanisms used be adapted to the specific information needs of the clients of the review (p. 4, emphasis added).

Later in the policy, this point is emphasized:

When developing their review plans or the terms of reference of strategic and other key reviews, departments should ensure that the information needs and priorities of the Treasury Board and other Cabinet committees are addressed whenever possible.

This will also help departments to generate the information they require to demonstrate credibly their [program] results to central agencies, *Parliament and the public* (p. 7, emphasis added).

Certainly these two quotations from the TBS are difficult to argue with. But, one could ask, how easy are they to implement? The 2000 audit carried out by the OAG referred to earlier in the chapter indicates that the ability of practitioners of review to serve Parliamentarians, or the public for that matter, by providing review-related information is circumscribed. Namely, there seems to be a marked lack of understanding or consensus within the federal government – and perhaps even among Parliamentarians themselves – on what information they want when reviewing the performance of departments and agencies, or the programs that government administers and/or delivers.

The OAG points out three major obstacles to clear, fair, reliable, and concrete performance reporting; these are that the process of reporting the performance of a particular department or agency:

- Provides few incentives for solid reporting, and conversely few sanctions for poor reporting;
- Has political dimensions; and
- Is without the understanding of basic principles for good reporting to be able to apply them.

The main message of the OAG (2000) is that federal departments and agencies are not providing the type of performance information that they should. But even if these organizations were, the OAG suggests that the *Departmental Performance Report and Report on Plans and Priorities* documents may not be the best mechanisms for communicating performance information given that Parliamentarians repeatedly report being frustrated "...over the limits on the role that they [Parliamentarians] play in the *Estimates* process". The OAG called this perception "a major stumbling block" (at 19.105) in ensuring that Parliamentarians receive the right type of information so that they can conclude whether or not Canadians are getting value for their tax dollars in order to hold the government accountable to the public.

Another obstacle is the fact that there is no consensus on what kinds of performance information Parliamentarians require in making decisions about how departments or agencies are doing, or at a more micro-level, gauging the performance of these organizations' programs. The OAG recommends that, as a next step, "[t]he government should work with Parliament and its auditor to agree on *principles for reporting performance information to Parliament* (at 19.121, emphasis added).

A proposed solution which appears in one of the OAG's conclusions is that:

...[I]t may be time for legislation. Several jurisdictions in Canada now have legislation requiring government to report on its performance to the legislature. Legislation highlights the importance of good reporting and puts

it on a more permanent and stable footing (at 19.1).

This case study provided an opportunity to examine an example in which precisely such legislation was in place, ostensibly to obtain information about a program's performance. However, the starting point for the review framework studied here was *not* an investigation into the government's rationale for including a mandatory review clause in the *Agricultural Marketing Programs Act*. Rather, it was to assist program managers in coping with the inevitable task of preparing to review AMPA as mandated by the legislation according to the current best practices identified in the evaluation literature.

Those practices, however, fail to accommodate the political context explanation that accounts for the apparently anomalous presence of the review clause in this legislation. In light of the difficulty faced by evaluators in knowing the expectations and needs of Parliamentarians, the case study offers a cautionary tale.

It may well be that the government of the day used a mandatory review clause in the *Agricultural Marketing Programs Act* not to ensure that it obtained information about the programs' performance, but rather to allay concerns about the program's effect on trade. At the very least, the presence of the clause in the *Act* allowed the government to buy itself five years to deflect attention from AMPA's potentially trade-distorting impacts. The program includes agricultural products which are the subject of international trade concerns over subsidies to Canadian producers, and the potential consequences should WTO sanctions arise

could have a deleterious effect on the government (both to AAFC and other departments which are involved in assuming the responsibility for trade matters generally, and WTO in particular). If, in 2002, AMPA still poses difficulty for the government on the trade front, the presence of the mandatory review clause also serves as notice to the agriculture and agri-food sector that the program popular with producers may be ended.

Significantly, my pre-implementation research did not reveal any *a priori* indication that the appearance of this type of clause in the legislation governing AMPA was due to the government's concern over negative reactions to the program with respect to trade. As discussed in Chapter 3, the Branch (MISB) of AAFC responsible for AMPA at the time of my first research phase conducted extensive consultations in 1995 and 1996 with various parties including producer organizations on the formation of the program. From the records of these documents, there is no available evidence that trade implications or the potential phasing out of some of the AMPA subsidies were raised at that time. Hence the operative assumption within the Branch appears to have been that the primary, if not exclusive, focus of the subsequent evaluation should be on "improved efficiencies" in the delivery of the various programs, rather than any summative enquiry into the continuation of the programs themselves.

Without a formalized process to obtain the expectations of the distant (i.e., ultimate) clients of review, practitioners of evaluation and review risk being "off the mark" in addressing Parliamentarians' and others' information needs regarding program performance. Thus,

before general legislation requiring further reporting to Parliament, or further inclusion of mandatory review clauses in all statutes, is seen to be a panacea, such contextual conditions need to be explored. To be able to refer practitioners to the original intentions of the ultimate clients of review, they need to be written into program legislation with greater clarity. As my dissertation research illustrates, legislation that provides no specific guidance means that it is very difficult for members of the evaluation and review communities to directly meet the needs of Parliamentarians or the public. The research necessary in this case to track down the government's apparent intent in including the clause for the review of AMPA went well beyond what everyday practitioners can be expected to undertake.

7.2 Future Research

This section suggests three possible areas for future inquiry. First, much of the "flavour" of the review framework for AMPA reflects the attempt to create a practical and client-friendly method that the program's management could and would use. The importance of involving AMPA's managers and staff in the review process was emphasized as well as that of tailoring the framework to the organization in which it was situated. To that end, the review framework was linked to the business line context of AAFC (i.e., its organizational mandate and contributing activities or programs) so that the framework would not appear in isolation from, and indeed could contribute to, other AAFC activities. Yet a tension between political considerations and the bureaucratic decision making process influences the results of review efforts; reconciling these conflicting requirements is an area that future researchers should focus on.

Secondly, given the emphasis on partnering with evaluators' direct clients in review processes, subsequent research needs to be carried out in order to identify what is required from practitioners to better serve these ultimate clients of the review process (i.e., Parliamentarians and members of the public). Of course these two groups themselves hardly represent a homogenous clientele. At least one evaluator (Mabry, 1999) seems to recognize that the lack of uniformity in, much less precise knowledge about, what accountability means to different groups makes it very difficult for review practitioners to provide the right kind of information to all of them. She even suggests evaluators create definitions which specify what it means to serve the greater public good before carrying out their work. I would like to see this occur in subsequent inquiries.

A third possible area for future attention results from the fact that the self-report of program managers was relied upon to fuel my conclusions about the utility of the review framework for AMPA. Further investigations into the viability of these types of frameworks could, in addition to determining the replicability of my mid-implementation findings, compare clients' self-report of their involvement with reports from clients of a more traditional evaluation framework. As Toffolson-Weiss et al. (1999) suggest, the financial cost of involving program staff and managers to a greater extent than traditional frameworks could be compared, and perhaps weighed against their attitudes about review and evaluation as a result of their increased involvement and buy-in.

In offering some final thoughts, my dissertation comes to a close with the following

concluding remarks.

7.3 Final Thoughts

It is insightful to return here to Helgason's (1999) observation that "[t]he history of evaluation may be characterized as one of unfulfilled promises" (p. 9). Notwithstanding this pessimistic appraisal, my stance should not suggest to the reader that evaluation serves no purpose, and/or that it needs to be replaced. To the contrary, and as mentioned in Chapter 2, frameworks generally offer an improvement over the practices of the past which saw evaluations being conducted without first preparing a framework to "set the stage" for subsequent program review. Indeed, participants in the pre-implementation interview sessions responded favourably to learning that a framework was being developed proactively for AMPA, and voiced support for the need to do careful preliminary work before devoting considerable resources to evaluation. It must be recognized that even *evaluation* frameworks act as the basis for program improvement.

Rather than drilling any deeper into the debate surrounding the utility (or lack thereof) offered by traditional evaluation tools, it is important to emphasize that the definition of the clients for frameworks must ensure that Parliamentarians, and the public whom they represent, have the information that they need to make evaluative judgments about a given program's performance. At this stage, the jury is still out on whether or not an increased use of mandatory review clauses in program legislation will be the solution to the problem (see OAG, 2000). Despite some limitations, the review framework developed for AMPA

provided assistance to AAFC in carrying out its preparations thus far in order to fulfill its legislated mandate for review. Put another way, the organizational compliance with the mandatory review clause in the *Agricultural Marketing Programs Act* was of higher caliber than if the general review framework had not been developed as a general guide. Many evaluation questions already have been anticipated (see Appendix 6). Further, managers in the mid-implementation interviews indicated that the review was destined to be a more methodically sound and comprehensive process than if a review framework for AMPA had not been in place.

Yet in light of my focus on the *Act* that governs AMPA, it is possible to propose that the next frontier for evaluation will be the appraisal of policy in a global, interconnected world where trade rules and other agreements will dominate and limit the conduct of public policy. External obligations and the pressures of negotiating partners will shape much of the formation, as well as the evaluation, of national policy initiatives. It will be essential, as the numbers and influence of stakeholders expand dramatically, to deal with the issue of secrecy. The secrecy surrounding the federal budget, for example, suggests that it should be possible – indeed, that it is crucial – to get beyond a guarded culture in negotiations. This obviously holds true for trade rules and obligations, as well.

Thus the case study illustrates a basic systemic flaw in a world which operates with NAFTA and the WTO and purportedly serves a public that generally has lost confidence in government. For in this day and age it could be said that public opinion is poised to believe

that government is willing to sell out the public interest under the pressure of commercial interests engaged in secret negotiations.

When presented as such, the current state of affairs provide a signal to the evaluation community on to how to do things right. But it is very difficult to know how to do the right thing when real objectives are disguised by the necessary realities of negotiating on an international stage, as well as the unnecessary realities of what some may see as excessive secrecy in government.

In conclusion, the dissertation has revealed a number of real and ecologically valid organizational reactions to a legislatively mandated review. Based upon the evidence collected, analysed, and profiled herein, we can conclude that improving program performance and increasing the utility of review and evaluation for managers are still important goals in the 21st century. As is strengthening the accountability of government to stakeholders such as Parliamentarians and the Canadian public. At present these remain unfulfilled goals, but the recognition of the goals in contemporary practice is crucial for the strengthening of accountability of government to stakeholders cries out for the committed attention of not just the evaluation community, but of citizens as well.

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APPENDIX 1: LIST OF LEGISLATION

Access to Information Act (1982)

Agricultural Marketing Programs Act (1997)

Advance Payments for Crops Act (1977)

Agricultural Products Board Act (Repealed in 1997¹⁶⁰)

Agricultural Products Co-operative Marketing Act (1939)

Bank Act (1991)

B.C. Regulatory Impact Statement Act (2000)

Canadian Security Intelligence Service Act (1985)

Canadian Wheat Board Act (1985)

Civil Service Act (1918)

Consolidated Revenue and Audit Act (1931)

Criminal Code of Canada (1985)

Finance Act (1869)

Prairie Grain Advance Payments Act (1957)

Statutory Instrument Act (1970)

¹⁶⁰ Unlike most of the other legislation that I cite, I wasn't able to locate the *Agricultural Products Board Act* from the Department of Justice (2001) to determine when enactment took place.

APPENDIX 2: LIST OF ACRONYMS

AAFC	Agriculture and Agri-Food Canada
ADM	Assistant Deputy Minister
APBA	<i>Agricultural Products Board Act</i>
APCA	<i>Advance Payments for Crops Act</i>
APCMA	<i>Agricultural Products Co-operative Marketing Act</i>
AMPA	<i>Agricultural Marketing Programs Act</i>
APP	Advance Payments Program
CFEP	Cash Flow Enhancement Program
CWB	Canadian Wheat Board
DM	Deputy Minister
DMC	Departmental Management Committee (of AAFC)
EMS	Expenditure Management System
EPAD	Economic and Policy Analysis Directorate (of AAFC)
FTD	Full-Time Days (for one employee)
GATT	General Agreement on Tariffs and Trade
GPP	Government Purchases Program
KRA	Key Result Area
MIS	Management Information System
MISB	Market and Industry Services Branch (of AAFC)
MP	Member of Parliament
NAFTA	North American Free Trade Agreement

OAG	Office of the Auditor General of Canada
PGAPA	<i>Prairie Grain Advance Payments Act</i>
PPP	Price Pooling Program
Q	Fiscal Quarter (e.g., Q1)
RB	Review Branch (of AAFC)
TBS	Treasury Board Secretariat
US	United States
WTO	World Trade Organization

APPENDIX 3: GLOSSARY OF REVIEW & EVALUATION**TERMINOLOGY**¹⁶¹

Activities	What a program does, the process by which it functions (e.g., providing program information, drafting agreements, providing on-the-job training, mailing cheques).
Contingency Liability	Any monetary loss incurred due to the difference in set price guarantees and actual commodity prices.
Direct Client	A person or group who has commissioned the project being undertaken, whether it be an evaluation or a review (see also Ultimate Client).
Effectiveness	Achievement of a program's objectives, intended effects, operation or activity.
Efficiency	Productive <i>use</i> of financial, human and physical resources with the goal of maximizing output for resource inputs or minimizing inputs for the quantity and quality of provided services.

¹⁶¹ Adapted from Review Branch (1998).

Impacts	<p>Also known as the results, and long-term outcomes, of a program.</p> <p>Can be intended / expected or unintended / unexpected in relation to whether or not the impacts match a program's objectives.</p>
Inputs	<p>A program's resources (e.g., staff FTEs, finances, capital assets).</p>
Internal Controls	<p>Policies and procedures in place that assist in mitigating the risk involved in the operation of the program within the organization.</p>
Logic Model	<p>A visual representation of a program's objectives, activities, outputs, outcomes, and impacts which is used to help the evaluator understand and describe the logical flow of the program as well as determine the program's intended impacts, unintended impacts, and links to other programs.</p>
Objective	<p>A declaration, in broad terms, of what a program or an organization seeks to achieve.</p>
Outcomes	<p>The short-term results a program seeks to achieve in order to meet its objectives.</p>
Outputs	<p>Goods or services produced or provided by a program, generally</p>

geared to the program's clients.

Performance Management See Results-Based Management.

Performance Measurement How a given program is performing on an ongoing basis, and the use of measures as a way of regularly monitoring that program. These performance measures provide a pulse reading of performance and are not as in-depth as evaluation or review.

Results-Based Measurement Also called "performance management", is a type of program management that focuses on the social impacts of a program's results rather than on its outputs, activities, or program processes.

Risk The possibility of adverse or potentially adverse consequences flowing from the performance of activities by an agency in achieving their objectives or goals.

Stakeholder A person or body with an interest in the results or actions of an organization due to the fact that they are directly or indirectly affected by those results or actions.

Ultimate Client A person or group who indirectly has initiated the project being undertaken, whether it be an evaluation or a review (see also Direct Client).

APPENDIX 4: PRE-IMPLEMENTATION INTERVIEW GUIDE

What I want to know

I. Acceptance and Relevance

IA. Strategic Goals

AMPA's Strategic Objectives &

Fitting AMPA into AAFC's

Performance Framework

IB. Client Focus

Relevance/Acceptance of AMPA to stakeholders

Question

I. Acceptance and Relevance

IA. Strategic Goals

- *What can you tell us about AMPA and its objectives? What about APP, PPP, and GPP ?*
- *How do you see the 3 programs of AMPA relating to each other?*
- *Is the AMPA legislation sufficient to meet its objectives?*
- *How do the interest-free provisions in the APP relate to what AMPA is trying to achieve?*
- *How does AMPA (and the APP, PPP, GPP) fit in with the overall strategic objectives of AAFC?*
- *Do you view AMPA primarily as a risk management program, market development program, or both?*

IB. Client Focus

- *Who are AMPA's (APP, PPP, GPP) clients?*
- *What do AMPA's (APP, PPP, GPP) clients like about the program?*
- *What are clients' concerns regarding AMPA (APP, PPP, GPP)?*
- *What is the best method(s) of inquiry to investigate clients' perceptions of the program(s)?*

II. Costs/Benefits

II. Costs/Benefits

- *What are the benefits of AMPA (APP, PPP, GPP)?*
- *How can we quantitatively relate AMPA's (APP, PPP, GPP) program costs to its benefits (i.e., orderly marketing, increased producer returns)?*
- *How will AMPA reduce overall program administration costs?*
- *What are program alternatives to AMPA (APP, PPP, GPP)?*

III. Management Effectiveness

III. Management Effectiveness

- *Which factors contribute to good management of AMPA and its three component programs?*
- *What are some key measures that would help AAFC judge the management effectiveness of APP and PPP (e.g., default rates, loan contingency)?*
- *Recognizing that the GPP has not been used, when and how should the government use this particular program?*
- *Who is responsible for the GPP?*
- *What are some administrative options to managing AMPA?*
- *What are the corporate risks of AMPA (APP, PPP, GPP)?*

IV. Results/Impacts

Fitting AMPA into AAFC Performance Framework

IV. Results/Impacts

- *In your mind, what are the key activities and outputs of AMPA (APP, PPP, GPP)?*
- *How do you see AMPA (APP, PPP, GPP) influencing rural communities? Co-operatives?*
- *Do you see AMPA affecting the self-reliance of the agricultural sector?*

APPENDIX 5: MID-IMPLEMENTATION INTERVIEW GUIDE

What I would like to know

Question

- | | |
|---|---|
| <p>I. Extent of implementation of the AMPA review framework.</p> | <p>I. I'd like to find out what's been done since the review framework for AMPA was completed nearly two years ago. [Questions 1 and 2]</p> <ul style="list-style-type: none"> •Which of these parts of the implementation plan [show Figure 5] have been initiated to-date? •Which of these have been completed at present? |
| <p>II. Reasons behind the lack of implementation of the review framework.</p> | <p>II. Can you explain why most parts of the plan were not implemented? [Questions 3 - 6]</p> <ul style="list-style-type: none"> •Were there any criteria, justifications, and/or organizational influences on the decision to initiate some parts of the plan but not others? •Who used the criteria, made the justifications, and/or made the decision to go ahead with some parts of the implementation plan and not others? •In your view, and given that the results of a review of AMPA are scheduled to be tabled in the Parliament no later than April, 2002, should more of the implementation plan been completed by now? (Why/not?) •What is the significance of the review clause in the Act for the review of AMPA? Are these clauses common? |
| <p>III. Utility of the review framework (to program managers).</p> | <p>III. I'd now like to get your feedback on the review framework, on the extent to which it met your needs and expectations. [Questions 7 - 11]</p> <ul style="list-style-type: none"> •Which aspects of the review framework best met your needs and expectations? (Why/not?) •Which aspects of the review framework were of little or no use to you? (Why/not?) •What suggestions for improvement would you make if you could recreate the framework now that almost 2 years have passed since it was developed? Please comment on the design of the framework in terms of its utility. •Did you feel part of the process in developing the review framework? •Which lessons, if any, have you learned as a manager as a result of the review framework for AMPA? |

APPENDIX 6: KEY REVIEW QUESTIONS BY RELEVANCE/ACCEPTANCE, COST/BENEFIT, MANAGEMENT EFFECTIVENESS, AND RESULTS

REVIEW QUESTION	INDICATOR	DATA SOURCE	IMPORTANCE
RELEVANCE/ACCEPTANCE			
<i>Relevance</i>			
<p>1) Do conditions in the sector exist which show the need for AMPA (APP, PPP, & GPP)?</p>	<p>◆ Stakeholders' response regarding the need for cash advances, price pooling, and the AAFC Minister's power to purchase/sell agricultural products (any overlapping programs also should be identified)</p>	<p>◆ Survey ◆ Producers ◆ Interview ◆ CWB ◆ Producer organizations ◆ Government officials ◆ Farm leaders</p>	<p>Lo Med Hi</p>
<p>2) Is the GPP relevant in today's context?</p>	<p>◆ Past implementation of GPP (i.e., # of requests vs. # of times GPP implemented)</p> <p>◆ Stakeholders' response on the relevance of the GPP</p> <p>◆ Content analysis of the rationale for implementing & not implementing GPP</p>	<p>◆ AMPA database</p> <p>◆ Interview ◆ Government officials</p> <p>◆ Review of AMPA files</p>	<p>Lo Med Hi</p> <p>Lo Med Hi</p> <p>Lo Med Hi</p>

<i>Acceptance</i>			
<p>3) What is the profile of producers who participate in APP & PPP?</p>	<p>◆ Characteristics of producers who participate in APP and/or PPP</p>	<p>◆ Survey ◆ Producers</p>	<p>Lo Med Hi</p>
<p>4) Are clients of the APP & PPP (producers, CWB, & producer organizations) satisfied with the program(s)?</p>	<p>◆ Producers' satisfaction with program delivery ◆ CWB & producer organizations' satisfaction with program management</p>	<p>◆ Survey ◆ Producers ◆ Interview ◆ CWB ◆ Producer organizations</p>	<p>Lo Med Hi Lo Med Hi</p>

Alternatives						
<p>5) What are the implications of changing or eliminating the interest-free or the loan guarantee conditions of the APP?</p>	<p>◆Stakeholders' response to potential changes to the APP</p>	<p>◆Survey ◇Producers ◆Interview ◇CWB ◇Producer organizations ◇Government officials ◇Farm leaders</p>	Lo	Med	Hi	
	<p>◆Proportion of defaults on advances under & over \$50,000</p>	<p>◆AMPA database</p>	Lo	Med	Hi	
	<p>◆Feasibility of APP alternatives</p>	<p>◆Economic analysis study</p>	Lo	Med	Hi	
<p>6) What are the implications of: a) Eliminating the PPP <i>or</i> b) Providing a loan guarantee in addition to the PPP price guarantee?</p>	<p>◆Stakeholders' response to potential changes to the PPP</p>	<p>◆Interview ◇Co-ops ◇Financial institutions ◇Government officials ◇Farm leaders</p>	Lo	Med	Hi	
	<p>◆Feasibility of PPP alternatives</p>	<p>◆Economic analysis study</p>	Lo	Med	Hi	

<p>7) What is the feasibility of other alternatives to AMPA (e.g., tax deferrals, cheque directly to producers, NISA contributions)?</p>	<p>◆Stakeholders' response to alternatives to AMPA</p> <p>◆Feasibility of AMPA alternatives</p>	<p>◆Interview ◆Co-ops ◆Financial institutions ◆Government officials ◆Farm leaders</p> <p>◆Economic analysis study</p>	<p>Lo Med Hi</p> <p>Lo Med Hi</p>
<p>8) Could private sector marketing tools (e.g., forward contracting, options, hedging) be as effective as AMPA in supporting the marketing of agricultural products?</p>	<p>◆Producers' current use of private sector marketing tools</p> <p>◆Producers' acceptance of & ability to use private sector marketing tools</p> <p>◆Expected costs & benefits of forward contracting, hedging, options, and other self-marketing strategies</p>	<p>◆Economic analysis study</p> <p>◆Survey ◆Producers</p> <p>◆Economic analysis study</p>	<p>Lo Med Hi</p> <p>Lo Med Hi</p> <p>Lo Med Hi</p>

COSTS/BENEFITS					
11) What is the economic impact of AMPA in relation to its costs?	◆Cost/benefit ratio with comparison to other agricultural programs	◆Economic analysis study	Lo	Med	Hi
	◆Value of AMPA to specific commodities	◆Case study analysis	Lo	Med	Hi
12) What is the interest saving to producer organizations generated by the APP loan guarantees?	◆Actual financing rate with APP vs. financing rate without APP	◆Access to credit study	Lo	Med	Hi
13) What benefit does the PPP price guarantee provide to co-operative marketing associations?	◆Stakeholders' response on PPP's benefits	◆Interview ◆Producer organizations ◆Financial institutions	Lo	Med	Hi
14) What are the benefits of the APP's interest-free provision?	◆Stakeholders' response on the interest-free provision	◆Survey ◆Producers	Lo	Med	Hi
	◆Implications to sector & government of eliminating the interest-free provision	◆Interview ◆CWB ◆Producer organizations ◆Financial institutions	Lo	Med	Hi

MANAGEMENT EFFECTIVENESS			
<i>Program Management & Delivery</i>			
<p>15) How satisfied are the CWB & producer organizations with AMPA's program management?</p>	<p>◆CWB and organizations' satisfaction with program management and delivery (e.g., timeliness of application review & payment system; managers' awareness of, & ability to meet, clients' expectations)</p>	<p>◆Interview ◆CWB ◆Producer organizations</p>	<p>Lo Med Hi</p>
<p>16) How satisfied are producers with the program delivery of AMPA by the CWB and producer organizations'?</p>	<p>◆Producers' satisfaction with program management and delivery</p>	<p>◆Survey ◆Producers</p>	<p>Lo Med Hi</p>
<p>17) Is the program database adequate to meet the ongoing needs of program staff and management?</p>	<p>◆Frequency of successful information requests (i.e., can the database provide the information requested?)</p>	<p>◆Management's assessment of AMPA's files & database</p>	<p>Lo Med Hi</p>
<p>18) Are APP and PPP program managers adequately informing the Department and stakeholders about the effectiveness of AMPA?</p>	<p>◆Level of stakeholder awareness of AMPA's performance</p>	<p>◆Interview ◆Stakeholders</p>	<p>Lo Med Hi</p>

<p>19) Does AMPA management have a good understanding of its human resource needs (e.g., training)?</p>	<p>◆ Human resource plan (which includes an examination of staff training and accomplishments)</p>	<p>◆ Assessment of Human Resources Plan</p>	<p>Lo Med Hi</p>
<p>20) Do program staff have a clear sense of purpose and know what is expected from them?</p>	<p>◆ Staff's perception of their roles and responsibilities</p>	<p>◆ Interview ◆ AMPA staff</p>	<p>Lo Med Hi</p>
<p>21) How effective is AMPA's business planning process in preparing for the future?</p>	<p>◆ AMPA Business Plan</p>	<p>◆ Assessment of the effectiveness of AMPA's business plan</p>	<p>Lo Med Hi</p>
<p>22) How effective is AMPA's measurement strategy?</p>	<p>◆ AMPA Review framework</p>	<p>◆ Assessment of AMPA's review framework</p>	<p>Lo Med Hi</p>
<p>23) Compared to pre-AMPA programs, how effective has AMPA been in reducing current crop and regional inequities, inconsistencies in program administration, and overall program costs?</p>	<p>◆ Comparisons of pre- and post-AMPA ◆ Program costs ◆ Regional and commodity analysis on access, participation, etc. ◆ Program administration</p>	<p>◆ Interview ◆ All stakeholders ◆ AMPA database ◆ Document review</p>	<p>Lo Med Hi</p>

<p>24) How effective is the management control framework for AMPA?</p>	<p>◆AMPA Management control framework</p>	<p>◆Assessment of AMPA's management control framework ◆Interview ◆AAFC senior managers</p>	<p>Lo Med Hi</p>
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Corporate Risks					
25) How effective are the financial and administrative procedures of the CWB and producer organizations in delivering the APP and PPP?	◆Ongoing audit and monitoring of CWB and producer organizations	◆Assessment of program audit reports	Lo	Med	Hi
	◆# of defaults within CWB and each producer organization	◆AMPA database ◆Establish default & loss-ratio targets	Lo	Med	Hi
	◆Risk profiles of producers who are in default, by organization (& region)	◆Access to credit study (i.e., review credit rating of producers who defaulted)	Lo	Med	Hi
26) What are the risks of the PPP marketing agencies' ability to market agricultural crops?	◆Professional marketers' experience in marketing agricultural crops	◆Survey ◆Producers ◆AMPA files ◆Producer organizations' annual marketing strategy	Lo	Med	Hi
27) Is AMPA vulnerable to legal action?	◆AMPA's vulnerability to legal action	◆Assessment by Legal Services	Lo	Med	Hi

RESULTS			
<i>Primary Impacts of AMPA</i>			
28) Does AMPA enhance orderly marketing?	◆Stakeholders' response on AMPA and stability in the sector	◆Interview ◆Stakeholders	Lo Med Hi
	◆Producers' confidence in the co-operative marketing organizations used in the PPP?	◆Survey ◆Producers	Lo Med Hi
	◆Annual crop volumes supported by APP & PPP	◆AMPA database	Lo Med Hi
	◆Seasonal price variations & volumes for AMPA crops (harvest & post-harvest)	◆Statistics Canada	Lo Med Hi
	◆Assessment of AMPA's contribution to individual agricultural commodities	◆Case study analysis	Lo Med Hi
	◆Comparison with producers in the U.S.	◆Economic analysis study	Lo Med Hi

<p>29) Does AMPA improve producers' access to short-term capital?</p>	<p>◆Lending practices of banks and other suppliers of credit (e.g., How do practices change over time, are they different for different commodities, how does AMPA impact lending practices?)</p> <p>◆Terms and conditions by commodity for producers' operating lines of credit and credit availability from other suppliers (e.g., financial pressures at harvest, repayment terms, need for cash flow)</p> <p>◆Producers' response of whether or not AMPA provides additional credit in light of program-related costs (e.g., storage, program fees)</p> <p>◆How producers use their APP cash advances (e.g., paying off debts; purchasing seeds, pesticides, &/or farm equipment; NISA contributions)</p>	<p>◆Access to credit study</p> <p>◆Survey ◆Producers ◆Interview ◆Financial institutions ◆Other suppliers of credit</p> <p>◆Survey ◆Producers</p> <p>◆Document review</p>	<p>Lo Med Hi</p> <p>Lo Med Hi</p> <p>Lo Med Hi</p> <p>Lo Med Hi</p>
<p>30) Does AMPA optimize producers' returns?</p>	<p>◆Comparison of actual selling prices obtained by APP & PPP participants at harvest</p> <p>◆Assessment of AMPA's impact on producers' farm income including storage, carrying, and other related costs</p>	<p>◆Document review</p> <p>◆Economic analysis study</p>	<p>Lo Med Hi</p> <p>Lo Med Hi</p>

<p>31) Does AMPA encourage co-operatives?</p>	<p>◆Stakeholders' response on how effective the PPP has been for co-operatives</p>	<p>◆Interview ◆Stakeholders</p>	<p>Lo</p>	<p>Med</p>	<p>Hi</p>
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<i>Secondary Impacts of AMPA</i>					
32) Has AMPA strengthened producer organizations?	<ul style="list-style-type: none"> ◆By commodity comparison over time of membership rates 	<ul style="list-style-type: none"> ◆Interview <ul style="list-style-type: none"> ◆CWB & producer organizations 	Lo	Med	Hi
	<ul style="list-style-type: none"> ◆Producer organizations' response on the importance of AMPA to their viability (e.g., perceived visibility among producers, and increased membership & administrative experience) 	<ul style="list-style-type: none"> ◆Interview <ul style="list-style-type: none"> ◆CWB & producer organizations 	Lo	Med	Hi
33) Does AMPA promote the visibility of the federal government within the sector?	<ul style="list-style-type: none"> ◆Stakeholders' reaction to CFEP 	<ul style="list-style-type: none"> ◆Document Review 	Lo	Med	Hi
	<ul style="list-style-type: none"> ◆Assessment of interest-free provision to government's goodwill (i.e., federal government visibility) 	<ul style="list-style-type: none"> ◆Interview <ul style="list-style-type: none"> ◆Stakeholders 	Lo	Med	Hi
34) Does AMPA help producers manage their own risks?	<ul style="list-style-type: none"> ◆Producers' response regarding participating in AMPA and managing their own risks 	<ul style="list-style-type: none"> ◆Survey <ul style="list-style-type: none"> ◆Producers ◆Economic analysis study 	Lo	Med	Hi