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France and Germany as 'NPM-laggards'?
Critical analysis of an international stereotype

Abstract:

While comparing the international reform movement within public administration, Continental Europe (with the exception of The Netherlands and a few other countries) is usually considered as a land of “latecomers” or even “laggards” as regards New Public Management, whereas the Anglo-Saxon countries are always described as “forerunners”. Germany and France in particular, probably because they are both “motherlands” of modern bureaucracy, are often described as resisting to such Anglo-Saxon Zeitgeist. As a result, the hypothesis too easily taken for granted asserts that public administrations in our two countries would have been less reformed than the ones of the UK or other EU/OECD countries.

The present paper is aimed at challenging such a prominent yet oversimplified assumption. Over the recent decades, France and Germany have undergone profound changes in their administrative structures, cultures and practices, some of them being partly inspired by NPM precepts and recipes while some others were more endogenous changes. In this paper, we wish to underline the importance of these national trajectories of reform, and to briefly compare them, so as to demonstrate that French and German public administrations have also entered, as the ones of other developed countries but in their own way, into the era of permanent institutional reformism.

Introduction:

Since the early 1980s, almost all Western developed democracies, followed later on by a significant number of developing countries, have embarked into a long-lasting period of major administrative reformism oriented at the transformation of public administration, and the public sector at large (on the history of this trend, see for instance, Aucoin, 1990; Christensen and Laegreid, 2007; Hood, 1991; Peters, 2001; Pierre and Ingraham, 2010; Pollitt and Bouckaert, 2004; Savoie, 1994). During these decades, a sort of generic “model” for administrative reform, usually called “New Public Management” (NPM) in the international scientific literature, has been diffused over the world. Under this NPM banner, NPM promoters, among which neo-liberal think-tanks, business schools, consultancy firms, but also international organization (namely the World Bank and the IMF, the OECD and to a certain extent the EU), have insisted on the necessity to better separate ‘strategic’ policy-making from operational activities and service-delivery; to professionalize management in the public sector; providing ‘customer choice’ by allowing a wide variety of service providers to enter a quasi-market for public service; to produce public services in collaboration with NGOs and civil society; to develop performance measurement and management by objectives; to “contract out” or privatize whatever was possible; and last but not least to cut the expansion of the public sector, public expenditure and taxes by increasing the cost-efficiency and productivity of public administration. The chief objective of this reformism has been to develop a “modern”, “efficient” and “lean and mean” public service, in accordance to the “more value for money” slogan. Some extreme gurus have even claimed their objective of getting rid of ‘big government’ and ‘red tape’ and ‘de-bureaucratizing’ bureaucracy so as to ‘reinvent government’ (Osborne, Gaebler, 1992).

Since NPM emerged in the UK under Thatcher, and was soon transmitted to Canada, New Zealand, Australia, then to a lesser extent to the USA, and since much of the administrative reform history of the past two decades seems to be the one of the worldwide diffusion of NPM precepts and recipes via Anglophone channels mainly (Cheung, 1997; Kettl, 2000; Pollitt and Bouckaert 2004; Ejersbo and Greve 2005; Premfors 1998; Turner, 2002), the scientific literature of comparative public administration – itself rather dominated by Anglophone scholars – has tended to develop broad cross-country comparisons which too often end up with such simple dichotomies as the one opposing, on the one hand, Anglo-Saxon countries qualified as “forerunners” of the reform movement and, on the other hand, Continental Europe countries (with some remarkable exceptions such as the Netherlands, whose traditional proximity with the UK is not to demonstrate) often qualified as “maintainers” or “latecomers” in terms of NPM-inspired reforms, if not disqualified as “NPM laggards” which would have not reformed their public administration.

This contribution is aimed at demonstrating that, in the cases of Germany and France only considered here, this over-simplified assumption is simply untrue and is nothing but a stereotype. Although France and Germany belong to the “classic” Continental “romano-germanic” administrative culture that is more characterized by legalism and is more cautious towards managerial ideas and recipes than their Anglophone counterparts, it would be completely misleading to ignore that our two countries have undergone profound changes in their administrative structures, cultures and practices, some of them being partly inspired by NPM precepts and recipes while some others were more endogenous changes (including some of solutions broadcasted as NPM-inspired but which were already well-known and practiced for a long time and prior to the international NPM momentum). In the present paper, we wish to insist on the importance of these on-going reform processes and their mitigated results in the two countries. Our findings provide empirical evidence for the thesis that France and

Germany have, over the past two decades, reshaped their administrations to a larger extent than what is usually said. But they have done it in their own way, borrowing some elements from the NPM repertoire but “acclimatizing” them and combining them with other incentives or logics of modernisation, so as to generate their own national trajectories of reform (on these aspects of acclimatization and differentiation, see Eyméri-Douzans, 2011). Moreover, in both countries, not only positive effects have emerged from NPM-inspired measures: as always when public policies come to their implementation, unintended consequences and a number of negative impacts have appeared, and have provoked some institutional reform adjustments, which in turn influence the whole reform trajectory and increase its idiosyncratic nature in each national case.

This paper will be divided into three sections: the first section recalls the starting conditions of reforms as they are embedded into the inherited administrative orders of the two countries. The second section quickly presents the “NPM-Laggard/maintaining-hypothesis” and discusses its nature as a stereotype in comparative literature, while the third section develops empirical evidence which disprove that stereotype regarding France and Germany.

1. Starting conditions of reforms: key features of the inherited administrative orders in France and Germany

When trying to assess reform dynamics and trajectories, with their differentiated outcomes, from a cross-countries comparative perspective, it is always helpful to briefly recall some the “starting conditions” of administrative modernization in the countries under consideration. One striking similarity between France and Germany is their common administrative “regime” and culture. They both belong to what is usually referred to in well-known typologies as the “classical” Continental European administrative model (see König 2006) characterized by the prominent figure of a tutelary “*Rechtstaat*”/“*Etat de droit*” which retains much of the “*imperium*” inherited from Roman law, is characterized by the “sovereignty” developed after the seminal writings of Jean Bodin, and is entrusted both in the Hegelian and Rousseauist tradition with the responsibility and authority to rule the country and the society by means of “*la Puissance publique*” in accordance with an overarching “General Interest” – all this being developed by a “general theory of the State”, both in France in the 1880s (Adhémar Esmein, Léon Duguit, Maurice Hauriou, Raymond Carré de Malberg) and in Germany (for a detailed analysis, Schönberger, 2006). On the contrary, in the British model of common law, limited monarchy, and parliamentary regime grounded into liberal philosophy, “the Crown” (and not “the State”, which is not a commonly used notion over the Channel, as recalled by Kenneth Dyson who even qualifies Britain and the USA as “stateless societies”, Dyson, 1980) has never had for long such a prominent ruling position (see the classic Badie, Birnbaum, 1979). As a consequence, the administrative organisation going along with the political regime, the administrative order in France and Germany has been structured historically quite differently from the one in the British model (for a comparison, see Dreyfus, 2000): public administrations in Germany and France correspond quite well to the Weberian ideal-type of bureaucratic organization characterized by steep internal hierarchies, highly specialised institutional structures and marginal scope for corresponding responsibilities, and administrative procedures are primarily rule-bound and legally oriented – as often said in the French administrative tradition “*l’obligation de moyens primait sur l’obligation de résultat*”, on the contrary to the Anglo-Saxon model of public administration which has always been less differentiated and therefore more open to managerial and performance considerations and instruments. The budgeting process and the management of financial resources also used to follow in Germany and France a more input-oriented mode while costs of local services and

“products” were not registered. The phenomenon of historicity (Laborier, Trom, 2003) and/or inheritance (Rose, Davies, 1994) being so decisive as regards public administration or any institutions (Lagroye, Offerlé, 2010), these topical features of the inherited administrative culture still remain key explaining factors to understand the structuration and functioning of the German and French public sectors.

These commonalities between the two countries notwithstanding, their state, their administrative order and their traditional local government systems also show major differences. Without entering into too much detail, Germany’s federal system consists, in constitutional terms, of two layers, to wit, of the federal level (*Bund*) and the (16) *Länder* while the municipalities and counties are, in terms of constitutional law, regarded as institutionally belonging to the organisational body of the *Länder* (with the exception of Berlin, Hamburg and Bremen which, under the Federal Constitution, have the status of so called “City States”). In practical and functional terms, however, the municipalities constitute a “third” layer and level by which the bulk of public tasks are carried out. Under the Federal Constitution of 1949, the federal level is not allowed, with only a few exceptions, to have field office of its own on the *Länder*, regional or local levels. In a similar vein the *Länder* have largely refrained from establishing their own field offices on the sub-regional or local levels in leaving most public tasks to be carried out by the local authorities. Compared with local government in other countries, German local government is well-known for its multi-function model and an unusually broad range of duties and responsibilities discharged by the cities, municipalities and counties. This reflects a main feature of the German constitutional and administrative tradition within which legislation (or even simply frame-legislation) is “centralized” at the federal level, whereas detailed regulation, public administration and policy implementation, including the execution of federal laws and policies, falls to the *Länder* and particularly to the communes. According to estimates, approximately 70 to 85 percent of federal and State laws (as well as most of EU legislation) is executed by local governments. German local authorities have always carried manifold competencies and responsibilities, but also a strong political weight within the entire local (and sub-national) system - accordingly ranking with the “North Middle European Group” of local government systems (Hesse, Sharpe 1991). Territorial boundaries of local governments are quite heterogeneous due to the *Länder* being responsible for territorial reforms. Whereas some of the German *Länder* (for instance North Rhine Westphalia with 370 municipalities embracing 45,000 inhabitants on average) belong to the North European type of local government structures (similar to the UK and Sweden), others (for instance Rhineland-Palatinate with 2,300 municipalities and 1,700 inhabitants on the average) are closer to the South European model, thus resembling France.

It is often stated that the traditional highly centralized French “Napoleonic” model (see Peters 2008) largely differs from the decentralized federal German one (Kuhlmann 2009). It is not the place here to recall, in a perspective of socio-history, how the combination of the Absolutism heritage, the centralism and “legicentism” of 1789 Revolution, the building of the our strong modern administrative order under Napoleon, the concentration of political, economic, scientific and intellectual power in Paris over the XIXth Century (a phenomenon unknown in Germany because of its late unification), whose De Gaulle’s Fifth Republic regime is the ultimate and logical consequence has structured in France a “State-in-Majesty”, quite “immodest” (Crozier, 1997), compared to other democratic states, in its pretention to rule the society and organise the economy (Kuisel, 1984) in a sort of “state capitalism” (Schmidt, 2002), while the “elites of the Republic” (Charle, 1987) populated both the “summits of the state” and the top positions in business (Suleiman, 1979 ; Birnbaum, 1977). As a consequence, the central services of the State in Paris (“*directions d’administrations*”

centrales des ministères”) have developed their huge staffs and their numerous and detailed competencies in regulation and piloting of the whole process of public policies to an extent which is unknown both in Germany with its tiny federal ministerial departments or in the UK, where the “core executive” has always been much limited than in France. Moreover, the central government has developed in France over time a strong and numerous web of “deconcentrated services”, populated of central state civil servants in charge of implementing directly all the major public policies in the field, thus establishing a sort of “territorial state” more or less piloted by the prefects.

Precisely considering that situation, Hesse and Sharpe (1991) have defined a “Franco group” of local government systems, France being its prototype, which is characterized by a predominance of the state in local administration matters, combined with a politically influential position of elected local self-governments but few functional responsibilities of their own quite weak administrative services. With about 37,000 communes accounting for 1,600 inhabitants on average, and 100 *départements*, plus 22 more recent regions, France has inherited a fabulous institutional “*millefeuille*”, which used to be dominated in the 1960s-1970s by a complex mechanism of political exchange and bargaining (whose model has been developed by Crozier, Thoenig, 1975 under the notion of “*régulation croisée*”) between the Prefect and a limited number of political “*notables*” (Grémion, 1976) whose main source of influence on the game resulted from the tradition of “*cumul des mandats*”: important mayors are also members of the Parliament, and local politics are therefore “nationalised” in a way unknown in comparable western democracies (for a franco-british comparison at that time, Lagroye, Wright, 1979), or national politics invaded by local issues and demands, in a situation of “*pouvoir périphérique*” (Grémion, 1976).

After recalling these necessary elements of the inherited scenery in both countries, it is time to move up to the second section and to start our discussion on the “laggard” stereotype.

2. The “NPM-Laggard/maintaining-hypothesis” as a stereotype in comparative literature

The distinction between Anglophone NPM “frontrunners” and Continental Europe “NPM followers” or even “laggards” has been developed for almost two decades in the (Anglophone) literature of comparative public administration. If the significance of this distinction was cautiously limited to the observation that NPM as a reform paradigm and a “policy discourse” was born in Anglo-Saxon countries, that the first governmental programmes of reform explicitly inspired by NPM ideas and solutions were the ones of Thatcher, Mulroney and Reagan, and that these programmes have been implemented with a strong and constant political commitment since then, whereas France under Mitterrand first mandate or Germany under Helmut Kohl proved to be reluctant to enter into that momentum, and, since then, our countries have opened up to NPM with moderation compared to “frontrunners” (but this is true also of the US central administration, which is in reality less “NPMised” as Europeans think), there would be no serious point for scientific disagreement. But, as it often happens when broad international comparisons and typologies are proposed, an over-simplified version of the story has emerged: continental “followers”, like France and Germany, would be in fact “maintainers” of classic/“old” bureaucracy which are not truly or seriously reforming their public administration. This thesis is expressed repeatedly in the literature (for an example among others, see the special issue of *The International Journal of Public Sector Management*, 21(2), especially the introduction by Edoardo Ongaro, 2008) to such an extent that it is now too often a taken-for-granted, unquestioned assumption, as

illustrated by the following quotation borrowed from an article published in the latest issue of the renowned scientific journal *Governance* (Vol. 24, number 2, April 2011): “Our research sheds light on the predictors of reform implementation failures in ‘laggard’ countries such as Italy, Germany, Spain and France, where managerial reforms have hardly been implemented in the public sector” (Cristofoli, Nasi, Turrini, Valotti, 2011, p. 279).

This is an interesting example of a quite ordinary logical mistake in social sciences: from a first valid factual observation – here, the fact that continental countries like Germany and France were initially reluctant towards NPM discourse and have adopted its rhetoric with a noticeable delay compared to the “frontrunners” – a completely false assertion is derived by means of Manichaean over-simplification on the basis of insufficient in-depth empirical knowledge of the real cases – here, the assertion that NPM latecomers would have made almost no administrative reforms, which is simply untrue. Before giving, in the third section of this paper, several elements of empirical observations, both in Germany and France, demonstrating that the real situation is far more complex, we would like to consider here some logical reasons which could explain the diffusion of such an erroneous thesis in the scientific literature.

A first reason for such a mistake – once again the thesis that NPM “latecomer” countries are doing no serious reforms and mainly “maintaining” their ancient bureaucratic system with some “window-dressing” – is probably to be found in the attachment of scholars to their inherited typologies opposing well-known and thus comfortable models. Liberal Anglo-Saxon countries with a “modest” state are to be more open to managerial ideas and solutions coming from the private sector, and therefore NPM-inspired reforms are likely to be more radical there, whereas it is assumed that NPM reforms in Continental Europe would be rather limited in scope and outcome, because the neo-managerialism would largely contrast with the deeply embedded “stato-centric” tradition and legalistic institutional practices in those countries (see Pollitt, Bouckaert 2004; or König 2006). The administrative regime of legalism would especially hinder NPM-driven reform measures, such as performance management, output-steering, contractual arrangements (see Kuhlmann, Fedele 2010). Therefore, Continental European countries were expected to fit the prototype of “*maintainers*” instead of the British or New Zealand “*marketizer*” prototype: while neglecting some inconsistent empirical findings treated as “details”, inherited typologies can thus be preserved and renewed, in a kind of “hysteresis of academic *habitus*” to express it in the lexicon of Pierre Bourdieu (Bourdieu, 1984).

The “maintaining-hypothesis” has also gained important theoretical support by the historical and sociological approaches of New Institutionalism (March, Olsen, 1984; Hall, Taylor, 1996). Both theories insist on the fact that the functioning of institutions are historically and culturally ‘embedded’. Historical Institutionalism stresses path dependencies, which are assumed to predetermine further institutional development (see Steinmo et al. 1992; Immergut 1992). From this theoretical perspective, policy choices appear to be conditioned by ‘policy legacies’ springing from, and ingrained in, the past. According to this approach, institutional structures sculpt historical landscapes and thus act as a determinant in guiding historical development along a set of ‘paths’. The sociological approach to New Institutionalism puts greater emphasis on cultural imprints, cognitive scripts or maps, habits and routines, *ethos* and moral templates that provide ‘frames of meaning’ guiding human action in society (Powell, DiMaggio,). In accordance with this theory, underlying cultural ‘embeddedness’ of institutional arrangements is not bound to result from the introduction of new formal rules, in our case NPM-inspired ones. As a consequence, in Anglo-Saxon countries where the inherited cultural patterns are marked by managerial approaches, NPM reforms can achieve more easily

“big steps” (in the sense of Lindblom, 1979). On the contrary, there can be misfit between NPM-inspired reforms and cultural legacies springing from the past, this being the case of continental states like France and Germany, where both historical and sociological institutionalist theories take for granted that only “incremental” change can occur.

A third reason for the development of the wrong “maintaining thesis” about Continental European states could probably also be found in an indirect influence of NPM promoters world views on some scholars who study public administration reforms. Since NPM promoters develop a sort of taylorist “one-best-way” rhetoric and quite ideological discourse in which the “change in mentalities” and “cultural revolution” among public agents is considered as being as determining as the introduction of managerial tools *per se*, we can notice in many writings from management scholars, and also public administration scholars, a tendency to consider that those governments which does not convert themselves to an explicit ideological discourse borrowing NPM slogans are not “true” or “serious” reformers. In those cases, a kind of confusion is made, where “NPM” and “reform” are taken as pure equivalents, ignoring that a) administrative reforms have existed far before NPM birth, b) that non-NPM inspired major reforms (such as decentralisation in France) can coexist in the NPM era with managerial innovations, and c) NPM is not a “take-it-or-leave-it-all” full ideological package to which one has to “convert” or not, in the form of an ideological hegemony. On the contrary, a growing number of scholars now develop a more balanced vision of the complex and subtle interplay between NPM trends and national policies of administrative reforms, such as the one proposed by Kerstin Sahlin-Andersson: of course, mimetic situations do exist, with massive imitation of international models, sometimes imposed to national governors by international organizations (IMF, World Bank, etc.). But they coexist with at least two other types of situations: the ones in which national decision-makers borrow and adapt models and tools diffused via diverse trans-national networks (major consultancy companies, as shown by Saint-Martin 2001, but also EU forums such as EUPAN, the European Public Administration Network); and also the ones in which reforms have a more endogenous logic of structuration, somewhat similar neo-managerialist solutions to comparable problems being ‘reinvented’ in parallel within several countries – a phenomenon observed so often in the historic anthropology of human societies (Sahlin-Andersson 2002).

In accordance with such a balanced and cautious approach, we would like to provide, in the next section, some empirical evidence for the assumption that those two topical “continental” states, France and Germany, have launched and implemented important reform programmes, which have already led to significant changes in their public administration structure and culture. Historical path-dependencies and cultural imprints notwithstanding, our two countries have shown considerable reform developments, although with varying degrees of implementation and different “success-stories”.

3. Empirical evidence to disprove the “maintaining-hypothesis” regarding France and Germany

The NPM laggard/maintaining hypothesis as regards countries like Germany and France appears to be a misleading stereotype, both because it does not correspond to empirical observations in our countries, as will be detailed hereafter, but also because it is based on a biased conception of NPM, which ignores its double nature. Let us first develop on this aspect.

If, like many scholars following a cognitive approach to “policy paradigms” and “paradigm shifts” (inspired by Hall 1993), you consider neo-managerialism as a generic and trans-cultural “intellectually driven revolution” (Hood, 1994) whose strength would rely mainly in the diffusion of beliefs, norms, models and languages (Meyer, Scott 1983), there is a risk to consider the worldwide spreading of NPM as a “quasi-religious movement” (so does Hood 2005), and thus to analyze its penetration into a given country in terms of a “conversion” - or a refusal of conversion – of those politico-administrative elites who pilot the state apparatus. In such a perspective, it is quite true that both French and German national politico-administrative elites have never claimed to be NPM “fans” and have never announced loudly their adhesion to NPM slogans, for many political and sociological contextual reasons, among which a posture of reluctance to the hegemony of Anglo-Saxon cultural products – which NPM undeniably is. When focusing the level of analysis to policy (and political) discourse, it is easy to conclude, wrongly, that French and German politico-administrative elites have not “converted” to NPM.

But such a narrow perspective on NPM neglects that NPM is not only an ideational product, but enjoys a double nature as an ideology and what can be called a ‘praxeologic’. Of course, neo-managerialism has undoubtedly an ideological dimension: it is a discourse which promotes a system of core beliefs (in the sense of Sabatier) and value-oriented precepts about what the state and public institutions ought to be, these core beliefs and precepts being well in line with the dominant neo-liberal *Zeitgeist* of the three latest decades. But what is remarkable with NPM is that its ideological dimension is supported by its second nature as a ‘praxeologic’, that is to say a practical repertoire of recipes and techniques. The content of this neo-managerialist repertoire (or toolkit) includes key features such as agencification and individualised budgeting, privatization and/or delegation of public services to external providers, benchmarking, indicators, accreditation procedures, citizens’ charters, increased transparency, performance management by objectives, HRM with individualized limited mandates, annual assessments and performance-related pay, programme budgeting and business-like accounting, administrative mergers and setting-up of ‘one-stop-shops’ either physical in the field or web-based administrative ‘portals’ of public e-services, public-private partnerships and delegation of public missions to private entities, ‘total-quality management’, certification ISO, and of course evaluation *ex ante* (the famous ‘impact assessment’ invented in the UK and now implemented at EU level and in many member states), *in itinere* and *ex post*, etc. These flagship recipes and techniques have repeatedly been broadcasted as ‘best practices’ in international and European forums where policy-makers from various countries pick them up and transplant them into their own public administration, generating an intense institutional import-export circuit between the programmes of administrative reform in various contexts (and layers of government). The comparative study of these programs concretely implemented shows clearly that it is quite often through such techniques and tools of ‘good management’, presented and often honestly perceived by the actors involved as ‘neutral solutions’, ‘simply modern’ and ‘similar to what the other states are doing’, that NPM has invaded the world (on the importance of being modern in a context of constant reformism, Lodge 2005).

And this ‘praxeological’ dimension of NPM is undoubtedly its major driver of diffusion: those in power in the state structure, both the elected governors and the top civil servants, can import and implement the neo-managerialist toolkit without having to declare explicitly their adhesion to the founding ideological corpus of NPM, which would provoke major political debates and public controversies in countries where the perception of Anglo-Saxon neo-liberalism is negative, precisely like France and Germany, but also many Scandinavian social-democrat welfare states: as shown by Christensen and Laegreid, NPM is both a matter of

'ideas and practices' (Christensen and Laegreid 2002). One can even argue that neo-managerialism has a greater potential of attraction and diffusion precisely because it is an ideology denied as such and disseminated as a praxeologic by means of a repertoire of tools, recipes and techniques, mobilized through the everyday practices of public agents: it is a neo-managerialism in action, functioning in a similar way as 'culture in action' (analysed by the anthropologist Ann Swidler, 1986).

Adopting on NPM and administrative reforms such a sociological perspective which takes the logics of practice seriously calls for a stronger attention to the dynamic ways and means, necessarily contextualised and localised, in which global neo-managerial precepts and recipes – being both 'constraints' and 'habilitations' (Giddens 1984) – are appropriated by (individual and collective) actors. Those actors strategically mobilise this managerial tool-kit, developing differentiated social usages of its elements, in accordance with the local configurations and power games in which they are daily involved (on the dialectic between global and local, Geertz 1986). It is precisely to underline this dimension of social embedding of NPM precepts and recipes into the discourse and practices of actors who/which are situated within the professional and institutional games peculiar to a given socio-political entity (either a nation-state, a territory, or a policy field) that we have proposed elsewhere the analogy of an "acclimatization" (Eymeri-Douzans, 2011).

When observing European countries with those lenses, it is obvious that, from the top to the bottom of public hierarchies, both the politico-administrative decision-makers who design and pilot administrative reforms and the middle managers or street-level bureaucrats who implement them do "acclimatize" some elements of the NPM praxeologic in differentiated ways from one country to another, depending on what can be called their own 'administrative culture' (conceived after Durkheim as a 'joint system of beliefs and practices', Eymeri-Douzans 2006), the related 'policy style' (in the sense of Richardson 1982), and more broadly speaking their own "trajectory of stateness" (Linz, Stepan, 1996).

And, if we now focus our attention on the French and German cases, empirical research does reveal that our two countries have developed important reform programmes whose concrete measures have sometimes an intrinsic rationale unrelated to NPM (such as decentralisation in France) but quite often are an "acclimatization" of large pieces of the NPM repertoire or tool-kit.

3.1 France

The portrait made of France in the standard Anglophone literature is quite often a caricature, insisting far too much on the inherited aspects of Permanence, such as the "Napoleonic model", the role of the Council of State, the weight of the central state apparatus in Paris, the survival of those powerful prefects who are unknown in so many developed countries, and systematically undermining or neglecting the elements of Change. Fortunately enough, those few comparatists really specialized on France, in continuation of Vincent Wright (Wright, 1978), draw a much more nuanced picture of the "governing and governance in France", showing that current "developments in French politics" (Cole, Le Galès and Levy, 2008; Cole 2008) are driven by major "constitutive" reform policies (in the sense of Ted Lowi), whose sustainable long-term effects are empirically demonstrated.

Three Series of on-going Constitutive Reforms

These three series of constitutive reforms have taken place, since the beginning of the 1980s, at the three institutional layers of power of:

- The central state: it is the well-known “*Réforme de l’Etat*” movement, with its various avatars from the “modernization” or “*Renouveau du Service public*” to Sarkozy’s “*Revue générale des politiques publiques*” (for an overview on this movement, see Bezes, 2009, complemented by Cole and Jones, 2005; Cole, 2008 ; Eymeri-Douzans, 2005, 2008; Rouban, 2003, 2008, and by the recent special issue of *RFAP*, 136, 2010 upon RGPP).
- The “territorial” state: prefectures and the vast web of central state services delegated to work in the provinces have been undergoing since the Loi Defferre (2 mars 1982) which introduced decentralisation (see below) to the benefit of local self-government a parallel process baptized “deconcentration” and consisting of an increased devolution of competencies from central ministries to “*services déconcentrés de l’Etat*” under the coordination of the prefects. The major legal framework was fixed by the ATR Law (“*loi sur l’administration territoriale de la République*”, 6 février 1992) and the “*Charte de la déconcentration*” (décret du 1er juillet 1992), which introduced the principle of subsidiarity into the French internal law and gave to “*services déconcentrés*” the ordinary competence to pilot public policies and to take administrative decisions. This deconcentration movement has been pursued, and combined with other aspects of administrative reforms such as the transformation of the *Equipement* (infrastructure) ministry and its territorial network (on this, see Gervais, 2011), and continued in the latest years under Sarkozy with the RéATE (*Réforme de l’administration territoriale de l’Etat*) whose rationale is to merge and reduce local services of the state at the levels of *départements* and regions, while better integrating their activity under the authority of regional prefects. As a consequence, 95% of central state civil public agents are now working within deconcentrated services, which also represent 75% of public expenditures of the state (for an overview on this movement, Epstein, 2011).
- Last but not least, the regional, provincial and local government: Since the abovementioned Loi Defferre (2 mars 1982), France has undergone a vast and consistent movement of increased “decentralization” of competencies to self-governed “*collectivités territoriales*”, which represent a real “*pouvoir local*” (for a recent synthesis, see Cadiou, 2009). This decentralization, even sanctified by the constitutional reform of the “Second Act of Decentralization” in 2003, is especially characterized by a) the survival of the two traditional levels of local government inherited from 1789, namely the 100 *départements* whose competencies have not been reduced but enhanced since 1982, and our myriad of 36,000 municipalities; and/but b) the setting-up of a professionalized, competent and unified “*fonction publique territoriale*” whose senior managers move from one collectivity to another and diffuse common repertoires of practices; c) the creation and assumption of 22 Regions entrusted with a key role in piloting economic development and which have soon became key arenas of political exchange (see Nay, 1997 ; Pasquier, 2004) ; d) and the quick development since the beginning of the 1990s, by means of several laws, of a fourth layer of local government under the name of “*intercommunalité*” (*Etablissements publics de coopération intercommunale à fiscalité propre*) which, in the three forms of “urban communities”, “agglomeration communities” and “communities of communes”, are now covering almost all the national territory and 90% of the French population, and have succeeded in concentrating all the relevant local policy competencies, budget and service delivery at a proper and viable level,

and thus achieved in a low-profile and non-mediatised manner a profound reform of French local government (see Desage, Guéranger, 2011).

Considering these three enduring and sustained movements of major institutional reforms that contribute to the transformation of French governing processes, it is clear that the second and third ones, namely the intertwined processes of (politico-administrative) decentralization and (administrative) deconcentration, are the product of a Franco-French contextual agenda and are developing according to a quite endogenous rationale which has little in common with the “importation” of NPM precepts or recipes. However, it is undeniable that these are profound reforms, going on in an important country, France, in accordance to their own logics, in parallel to NPM-driven reforms implemented at the same epoch in other countries: the French case study simply reminds us in that respect that NPM is not the only possible repertoire of institutional reforms in nowadays world.

But what about the first series of French reforms, the ones which concern the central state apparatus, and the degree to which they represent an “acclimatization” of the NPM repertoire?

The “Reform of the State” in France: a permanent reformism

It would be misleading to consider that the French administrative order was, in the past, a fixed and immutable system where the notion of reform was unknown. Quite the contrary, the Promethean post-War and then Gaullist State “*dirigiste*” and welfarist state of the “*Trente Glorieuses*”, and especially its farsighted administrative elites, had the clear pretention to act as change leaders in order to overcome the “*retard français*” and to proactively “modernise” the whole economy and society – what actually they achieved successfully to a large extent. In those decades, the French State was reformist, not for itself but for the country.

As demonstrated brilliantly by Bezes (Bezes, 2009), it is during the 1970s that the “*maladministration*” was publicised and constructed into a socio-political controversial issue, i.e. in the same period as, in the Anglophone world, neoliberal and new right think-tanks developed the ideas on which NPM is grounded: France was not left apart from the “movement of the world”, as it is too often wrongly argued.

But the fact is that, in the 1980s, France had a peculiar political timing within major democracies, since the Socialists finally won the presidential and general elections in 1981, at a time when neo-liberal leaders favouring a “roll-back of the state” and profound administrative reforms based on the precepts and recipes of “New Public Management” were coming into power in such countries as the USA, the UK, Canada, Australia, New Zealand, etc. Both the “*hauts fonctionnaires*” in the services and the socialist-communist governors (the minister for Civil Service, Anicet Le Pors, was actually a communist) agreed on the conviction that the State had to maintain its major role in piloting the evolutions of the French society and the functioning of the economy – what is often referred to as the “*référentiel modernisateur*” (Muller, 2003). As a consequence, against radical programmes such as the Thatcherite “Next Steps” in the UK, Mitterrand’s France adopted a cautious policy called “*modernisation de l’administration*”: piloted by senior civil servants themselves, because there was no political interest from the President nor from his socialist ministers for whom the civil service was mainly seen as their basic electorate, it was an intra-administrative process. It cautiously introduced some new managerial tools but without transforming the overall conceptual “frame” or institutional arrangements as regards the State missions and the Civil Service structuration (see Bezes, 2006).

The most ambitious version of that endogenous moderate reformism happened to be the “Renewal of Public Service”. This policy initiative was launched in 1989 by a famous “*Circulaire*” of Prime Minister Michel Rocard, a former senior civil servant himself known as a rather “technocratic” politician. It is interesting to underline that this policy was entirely conceived by a network of reformist “*hauts fonctionnaires*” who populated Matignon, the *Commissariat général du Plan*, and other relevant ministries (*Fonction publique* especially) at that time: many of them were belonging to the same “*Association Services Publics*”, an active small group of left-wing “*hauts fonctionnaires*” and academics who were obsessed by the urgency to start a real renovation of the French public administration inspired by the “philosophy of the General Interest” and promoting the participative instrument of “quality circles”, so as to prevent the system from radical neo-liberal and NPM-inspired reforms when the Right parties would come back into power (for a complete analysis of that first stage of administrative reforms in the 80s, see Chaty, 1997).

Afterwards came a new and really decisive period, under the right-wing 1993-95 Government of Edouard Balladur, with the combination of major “reports” whose preparation and writing was entrusted exclusively to right-wing “*hauts fonctionnaires*” to whom was set by the Prime Minister a clear “roadmap” to be more innovative and radical in their proposals: rapport Blanc, rapport Sirieyx, rapport Prada, rapport Picq (with Silicani). These reports have proven to be of the utmost importance for the evolution of public administration in France: they can be considered without exaggeration as the kick-off of a process of “acclimatisation” in this country of the core logics and main instruments of NPM. What is remarkable, and so French in that history, is precisely that the “change leaders” who orchestrated that new momentum were not coming from outside the Civil Service, but were once again “*hauts fonctionnaires*”, especially belonging to the “*grand corps*” to say the truth. Within a very short period of time, the succession of these reports paved the way for an in-depth trend of reform, borrowing from the NPM repertoire but quite often without saying it. There was a clear attempt to re-phrase the neo-managerialist discourse under some syncretic notions more acceptable in the context of the inherited French politico-administrative culture, such as the idea of marching towards an “*Etat-stratège*” (Eymeri-Douzans, 2006). It led to the adoption of the ambitious policy called since then “Reform of the State”, whose first concrete measures were adopted in application of a famous “*Circulaire*” signed by Prime Minister Juppé in 1995, and implemented under the responsibility of a “Commissariat for the Reform of the State” (CRE) entrusted to Jean-Ludovic Silicani, one of the leading change managers among “*hauts fonctionnaires*”. It is worth underlying that the “reform of the state” policy was never interrupted since then by the changes of political orientation of French governments between right and left parties. It is for instance under the socialist Jospin government (1997-2002) that the major reform of the French public finances and accounting system called LOLF (*loi organique sur les lois de finances du 1er août 2001*) was prepared and adopted at the unanimity by the Parliament, and implemented step-by-step since then under right wing governments. The “Reform of the state” programme has continued under Raffarin and Villepin governments, with various inflexions and institutional innovations that cannot be detailed here, such as the creation of agencies on the one hand and major administrative mergers (for instance, the reduction of the number of administrative copses from 1,500 in 2000 to 380 nowadays), all the consequences of back-office reengineering introduced by the habituation to working “*en mode lolfique*” (programme budgeting, everyday use of indicators, etc.), etc.

What is remarkable here is that, while one could have expected the French *Stand* of top civil servants to behave like a “veto group” towards radical changes, some of these brilliant

generalists have proven to take a broad view of the whole equilibrium of forces and to understand that the importation and appropriation of NPM precepts and recipes, provided they would be acclimatised in their formulation to the French culture, was a sort of historic necessity or fatality. It goes without saying that the increasing openness of national public administrations to international and European influences via institutional forums and networks such as the OECD-Puma or the European Public Administration Network (EUPAN) coordinated by the European Institute of Public Administration (EIPA, Maastricht) where senior officials from the Member States exchange ideas, share best practices and benchmark their respective successes and failures has strongly contributed to that dynamics of “policy transfer” (Dolowitz, 2000; De Jong, 2002). A strong empirical case study of such a dynamic is given in a recent PhD research which analyses the remarkable strategy of the technical “*grands corps*” of State engineers (*Ponts et Chaussées* and some others): transforming themselves into NPM reformers who promote neo-managerialist transformations of the major segment of the French State apparatus they control (the “MEDAD” Ministry) has proven to be a successful collective strategy which allows these corps to maintain and even reassert their position of domination over that policy domain, and their prestige against the “*énarques*” and other administrative elites with which they are involved in an endless spiral of intra-bureaucratic turf wars (Gervais, 2008). Isn’t it one more “French paradox” that the traditional administrative elites of a peculiar “State-in-Majesty” have been able to adapt their mental schemes and transform their behaviour so as to become the promoters of neo-managerialist solutions, acclimatised within the discourse of the “Reform of the State”, but whose core logic was really unfamiliar to the French administrative culture and deeply rooted into “Anglo-Saxon”, neo-liberal worldviews? Of course, by doing so, French “*hauts fonctionnaires*” have struggled to remain what they are since a long time ago: the dominant powerful co-governors of the French State, and also to a large extent of the French polity. Provided a group leads (or co-leads) the major changes that occur in a social or institutional order it dominates – whatever their direction is –, this group retains its “leadership” and thus can expect to be dominant in the new configuration generated by the changes.

But recent developments in the French “Reform of the State” process are transforming the whole scenery. The access to power of Nicolas Sarkozy and the launching of RGPP (Revue générale des politiques publiques) which have boosted the tempo of administrative reforms is not the sole explanation of this “rupture”. During the latest decade, which could be quickly described from a macro-level perspective as one of “normalisation” of the French model, a major but often neglected new trend has been the strong development of the consultancy field in France. Even though a few of them existed before and represent a sort of consultancy “made in France” (such as CEGOS, or to a certain extent IDRH), the main feature in the sector has been the “invasion” of major international firms which diffuse an Anglo-Saxon worldview, such as Accenture, KPMG, Cap Gemini, Ernst&Young, McKinsey, Deloitte, etc. Like in many other countries, it has become very fashionable in France over the latest decade, both in business and in the public sector, to contract with these consultancy firms whose influence has thus constantly increased (Saint-Martin, 2001). It is precisely since the policy shift of 1995 that political and administrative governors in charge of defining and piloting the “Reform of the State” have developed exchanges and collaborations with these consultancy firms. They first behaved in a very modest and cautious manner towards the “*énarques*”, but they have gained more and more self-confidence, especially through their strong involvement in Bercy (the Ministry for Finance and Economic Growth) into the conception and implementation process of the LOLF reform. The fact that Bercy has taken more and more, over the latest years, the lead of the Reform process reinforces mechanically this influence of consultancy people on the whole process. As clearly analysed by Philippe Bezes, the Directorate-General for the Modernisation of the State (DGME) created in Bercy in 2005 is a

true Trojan Horse for consultants: it has a staff of 115 rank A executives among which only 47 are career civil servants and 68 are contractual staff with a major but hidden proportion of consultants in it. Unsurprisingly, DGME constantly brings consultancy firms into the new initiatives they launch (Bezes, 2008). At the same time, it is worth underlying that, in accordance with a long-lasting French tradition for “*pantouflage*”, several *énarques*, especially from the Finance Inspectorate, have joined major consultancy companies and helped them building their “*Départements Secteur public*” (Rouban, 2010).

This new and major trend – which started under the government of the very “*énarchique*” Dominique de Villepin – has gathered strong momentum since the accession to power of Nicolas Sarkozy and his Premier François Fillon, men who do not belong to the administrative cast and are rather hostile to it, while more favourable to private enterprise than any President or Prime Minister since 1958. Their discourse on the necessary “re-invention of the state” has lots of similarities with the one of Thatcher in the 1980s UK. Another “rupture” is undoubtedly that the Reform of the State is no more a “technical” subject handled by the Prime Minister and the administrative elite itself. As Clemenceau saying “*la guerre est une chose trop sérieuse pour être laissée aux militaires*”, Nicolas Sarkozy has put the Reform of the State very high at his own political agenda: many of his speeches deal with it, even on tiny but significant aspects (such as the “discours de Palaiseau” about the reform of ENA and its “*classement de sortie*”); a special inter-ministerial committee chaired by himself is taking all the major decisions within the RGPP ambitious programme and the monitoring of RGPP implementation is centralised at the Elysée by a small task-force surrounding the Secretary-General of the Presidency. As a consequence, the French “*hauts fonctionnaires*” are no longer mastering the Reform of the State process as a leading elite of modernisers as they used to do. Under Sarkozy, the swing of the pendulum is clearly in favour of a reform coalition composed of the Chief Executive himself and his close personal advisors, the Prime Minister and his “cabinet”, politicians with a private background (such as Eric Woerth, former Minister for Budget, Public Accounts & Civil Service, who was an executive of Arthur Andersen) and the major consultancy firms. Four strong policy signals in that respect are a) the appointment of François-Daniel Migeon, who had a ten-year background at McKinsey (but was before a “*grand corpsard*” from the “*Ponts et Chaussées*”: things are never black or white) as Director-General of the abovementioned DGME; b) the fact that, according to actors interviewed, 80 % of the intellectual content and of the very ambitious RGPP (General Review of Public Policies) programme launched in 2007 has been elaborated by Bearing Point, a consultancy taking its inspiration from the Review of Programmes enforced in Canada a few years ago, and McKinsey; c) the observation that all the audit missions and evaluation exercises realised in the frame of RGPP 1 were conducted by “task forces” which mix together “*hauts fonctionnaires*” from the inspection and control corps and private consultants who gain occasion to identify the “SWOT” of sectoral public administrations which are potential markets for them; d) the contracting out to 3 major consultancy firms, for a huge amount of several million Euros, of the “accompanying measures” to the major reform consisting to merge the two enormous tax administrations, DGI and DGCP (Eymeri-Douzans, 2008). As a result, for the first time in the history of the Fifth Republic, top civil servants are contested in their traditional monopoly of expertise and policy advice to political governors in the field of administrative reforms and the policy networks of “change managers” is now enlarged and diversified, while these changes are subject to a significant acceleration in tempo and enhancement in scope and, also for the first time, a strong involvement of the President in person.

To sum up, we hope to have demonstrated here the extent to which the three layers of the French polity, namely the central State, the “territorial” state and local governments are

embarked in series of constitutive reform programmes, whose waves of reforms have acclimatized, in the French manner but more and more explicitly over time, many aspects of NPM ideas and “praxeologic”. France is not a “reform laggard” and the “maintaining thesis” of a French status quo is a myth.

3.2 Germany

Initiative and NPM-Reform Concept

Contrary to the Anglo-Saxon countries where NPM reforms, e.g. in the UK under the Premiership of Margaret Thatcher, have been a very “top-down” process imposed by those “radical” ministers in power and their politicized entourages, supported by conservative think-tanks and private consultancy firms, quite often against initially hostile Whitehall mandarins, the reforms inspired by neo-managerialism implemented in Germany must be understood in terms of a much more “bottom-up” movement, which has primarily been driven by local “entrepreneurs” whereas the Federal and most of the *Länder* governments have for a long time been reluctant to these reforms (see Klages, Löffler 1996: 134 ff.). One main originality of the German situation, in a comparative stance, is undoubtedly that local governments have been forerunners in NPM, performance management and benchmarking since the mid-1990s, whereas the State (both the *Bund* and the *Länder*) played practically no role, which means that this reform movement was undertaken voluntarily by local actors.

To enter into more details, this German localised “acclimatization” of NPM, the so-called “New Steering Model” (NSM), was explicitly inspired by local government modernization in the Netherlands, whose widely broadcasted “model” is the one of the City of Tilburg (see Banner 1991; Hendriks, Tops 1999; Reichard 2003; Bogumil et al. 2007; Kuhlmann et al. 2008). Pushed ahead by the KGSt (*Kommunale Gemeinschaftsstelle für Verwaltungsmanagement*; a think tank for local public service management sponsored by the member-local governments) the New Steering Model spread through the German local landscape like a “bush fire” (Reichard 1994; Wollmann 2003; Banner 2006). It became very quickly the predominant template of public sector modernization, not only at the local but – although hesitatingly - also at the *Länder* level and – to some extent – at the Federal level of government (see Jann/ Reichard 2003; Jann 2003).

It is true that compared to the international reform movement the NPM-agenda was taken up relatively late in Germany (Wollmann 2000, 923-25; Reichard 2003, 349). Only with the increasing budgetary and economic problems at the beginning of the 1990s, the managerial model of the NSM could gain a foothold not least following a broad diffusion campaign by the KGSt (Banner 2006, 127-29). It promised more efficiency, effectiveness, and customer-orientation. At the same time, the NSM forwent the discussion of outsourcing and privatization, which had noticeably improved the cognitive preconditions for a political reform consensus.

New Managerial Tools and Institutional Changes

According to survey findings¹, virtually every German local authority with more than 10,000 inhabitants (92 per cent) has pursued modernization activities since the 1990s, 80 per cent of which have been guided by the NSM-concept. Yet, with the unquestionable conceptual and discursive predominance of the NSM, the actual implementation of reform measures shows a quite different picture. Although NSM-protagonists have repeatedly pointed to the necessity of a “holistic” approach to NSM-guided reform implementation, more than 66 per cent of the cities only refer to some selected elements of this concept, whereas local governments aiming at entirely implementing the NSM are by far in the minority (15 per cent). These figures give support to our thesis of a strategic or tactic socio-political usage and importation of new managerial tools by the actors in the field, as observed in France (see above). In the following we analyse three core elements of this German NSM-reform more in detail: a) Budgeting and output-oriented steering; b) Benchmarking; c) Customer-orientation.

a) Budgeting and output-oriented steering: With regard to the fiscal problems of German local governments, it can come as no surprise that one of the most attractive reform instruments was the introduction of new budgeting procedures, which were to trigger a transition from the traditional cash accounting to a resource-based accruals accounting system. The survey results show that new budgeting systems have been introduced as a whole in 33.1 per cent of the municipalities; and in a further 34.4 per cent, they have been implemented in some selected service units. However, in most cases, a more input-oriented method of budgeting has been pursued and only in 15.7 per cent of the budgeting cases, measurable objectives and performance targets have been defined. Other attractive reform instruments were output-oriented management tools, such as controlling systems, quality management, indicator-based “product analysis” and new accounting procedures (for details see Kuhlmann et al. 2008). In total, 29% of German local authorities have created “product catalogues”, 46% have adopted costs and activity accounting, 22% have improved internal information by means of indicator-based reporting, and 26% have created a steering unit at top management level to coordinate and integrate performance information.

b) Benchmarking: Inter-municipal performance comparisons have also played an important role as an approach to administrative modernisation in Germany. Again, the KGSt, but also the Bertelsmann Foundation, were important agenda setters in this field of NPM-inspired modernization. Between 1996 and 2011, about 200 benchmarking projects have been carried out, involving more than 2,600 municipalities within the so-called “inter-municipal networks of comparison” (*interkommunale Vergleichsringe*) managed by the KGSt, whereby practically all local tasks were compared. As a total, 60% of German local authorities have participated so far in benchmarking projects, the main aim of which is to compare the structures, procedures, costs and quality of various local services. The participation is voluntary and the results remain unpublished unless the participating authorities agree to make them transparent to the public.

Furthermore, financial pressures at local and regional levels have boosted this benchmarking momentum and paved the way to more top-down and hierarchical forms of benchmarking. Arguing that borrowing remains limited between municipalities, local government supervisory authorities (*Kommunalaufsicht*) have intervened in several cases. For example, in

¹ In the following, we draw on a broad database obtained from a research project conducted between 2004 and 2006 (see Bogumil et al. 2007; Kuhlmann et al. 2008). Data basis: a nationwide survey of altogether 1565 German local governments, which was undertaken from the end of January to June 2005, including all municipalities with more than 20,000 inhabitants, three-quarters of municipalities with between 10,000 and 20,000 inhabitants (without regional bias) as well as two-thirds of the German counties. Response rate after two follow-ups: 42 % and 55 %.

the *Land* of North Rhine Westphalia, benchmarking has been made mandatory for all local communities since 2003. It is managed by the *Land* supervisory board for local governments (*Gemeindeprüfungsanstalt*), includes all relevant policy-fields and takes place on a regular cycle. Additionally, the importance of the audit courts grows and more and more compulsory (comparative) performance audits are taking place (e.g. in Hesse). Later on, this benchmarking fashion has spread up to the *Länder*-level, where several benchmarking projects have been initiated in the recent years, especially in tax authorities, police departments and courts. Finally, there was a constitutional amendment in 2009 which, for the first time, legally promotes performance comparison at the federal (*Bund*) and state (*Länder*) level. A growing debate is currently taking place in Germany as regards the ways and means of a reasonable increased implementation of this instrument.

c) *Customer-orientation*: Besides the introduction of performance management, benchmarking and output-oriented steering, the NSM policy discourse also proclaims the necessary advent of a “new relation” between local authorities and citizens, who are now to be acknowledged and treated as customers. Accordingly, many modernization projects (57 percent of the cases) were directed at creating local one-stop-agencies (“*Bürgerämter*”), in order to provide a “single-window-access” to the customers. Furthermore, local service provision was often territorially de-concentrated (40 percent), seeking to offer an easier access and to bring local government services closer to the citizens. Another component of customer-oriented reforms consists of process innovations aiming at reducing administrative processing time, enhancing internal coordination, and improving consultancy for citizens. In that respect, many local governments in Germany have conducted customer/citizens’ surveys (54.7 percent), some even introducing complaint management systems (“*Beschwerdemanagement*”; 29.9 percent).

Performance improvements

The voluntary, incremental and non-holistic reform approach notwithstanding, NSM reforms in Germany have caused many positive effects that are not only evident in the encouraging self-assessments of the surveyed mayors, but can also be seen in the actual service and performance improvements - particularly in sectors with direct and frequent contact to customers. Nearly 60 per cent of the German municipalities with more than 10,000 inhabitants have created one-stop-agencies (*Bürgerbüros*) and about 70 per cent have extended their office hours. Half of the mayors report reductions in the time necessary for administrative procedures in local government. A vast majority of the respondents report that the customer orientation within their authorities increased (95 per cent), the service quality was improved (95 per cent), the quality of citizens’ consultancy enhanced (85 per cent), that waiting times were cut (90 per cent) and processing times reduced (50 per cent). Overall, the reform steps towards strengthening customer-orientation can be considered as the most successful modernization measures. The interest of local actors in administrative modernisation reforms has allowed for the implementation of numerous performance-oriented procedures and instruments used for an ongoing internal self-evaluation and a continuous observation of administrative action and performance. Insofar, there is undoubtedly a link between the NSM-reform and the achieved improvements.

Drawbacks and Unintended Consequences

Despite these improvements in the quality of service, the German NSM-reform has also entailed many problematic effects. New management and coordination problems have arisen

from the attempt pursued in some cities at decentralizing resource competencies, abolishing levels of hierarchy, and strengthening service units acting as quasi-autonomous “result-centres” without establishing appropriate controlling systems and central steering mechanisms. Resulting from the (at least partial) abolishment of hierarchical subordination and levels of hierarchy an, as it were, “management vacuum” (*Führungsvakuum*) emerged with awkward consequences for steering and decision-making (see Bogumil et al. 2007: 151 ff.). As a reaction to the unintended consequences of NSM-modernization, local authorities have already taken back significant elements of the reform, which seemingly indicates “Re-Weberianization” of German local government after ten years of NSM-experimentation.

Furthermore, our case studies have shown that in practice, performance management instruments are barely used for political or administrative decision-making. In most cases, the information about the products and performance is not applied for budget approval nor for the reorganisation of administrative procedures or inter-municipal comparison. Most strikingly, 14% of local authorities that deal with performance indicators do not use this information at all. The proclaimed switch from “conventional rules-oriented steering” to “product-based management” has not occurred so far.

Another problem is that performance indicators relate solely to easily quantifiable ‘products’ (outputs) and costs (inputs), and sometimes procedure indicators. Quality and outcome indicators (effectiveness, efficiency and consequences of public policies) are barely taken into account. There is a precarious tendency of adding to the already existing bureaucracy of legal rules and procedures a new one that consists of indicators and ‘products’. One could say it is a ‘bureaucratic outgrowth’ of performance indicators. High transaction costs are a problem. Many local authorities called on quite expensive external advisers whose fees come to an average of €171,400 (according to our survey the cost of advisers is between €120 and €6,000,000). The considerable efforts towards reform have also generated additional expenditure in terms of time and personnel – an average of 15 months of individual work for the elaboration of the above mentioned “product catalogues” alone – and have not led to the anticipated long-term savings for the local budgets (Kuhlmann et al. 2008).

Conclusion: the Peculiar Reform Trajectories of Germany and France, an example of a neo-managerialist/Neo-Weberian mix?

Considering that comparative public sector research has repeatedly emphasized the continental European administrations’ inertia and their successful resistance to change (among others, see Jann 2001: 329), a detailed observation of the two cases of Germany and France over the recent decades provide many convergent empirical findings for a quite different and more balanced conclusion. Far from being unchanging states bogged down into the permanence of their inherited cultural patterns and models, both Germany and France have entered into the era of contemporary institutional reformism. They have done it in their own way, which is definitely not the one of an “institutional mimetism” (Mény, 1993) based on a pure and simple imitation of or conversion to NPM rationale in its Anglophone version.

For instance, we have shown that Germany, particularly at the local government level, has proven to be capable of modernizing its administrations and adapting to new institutional challenges although in a more incremental and pragmatic than comprehensive and strategic manner. As a result, they are undoubtedly more citizen and customer-oriented as well as

better performing than ten years ago. In parallel, to take another key example, the French LOLF has succeeded, within a decade, to profoundly transform the budgeting and accounting public system in France and, more importantly, provoked among public agents a “cultural revolution” in practice ending up with a true individual and collective appropriation of the “three Es” logic (Economies-Efficiency-Effectiveness) which is now observable in the handling of all dossiers and was unforeseen ten years ago.

All in all, it is undeniable that France and Germany, which are truly not NPM frontrunners, for all that are not reform laggards. Three major and common features of the German and French ways to step into the international momentum of reformism are to be underlined in that regard:

- a) France and Germany have started later than Anglophone countries;
- b) France and Germany have borrowed some elements (Germany) or lots of elements (France) of NPM, but not the “full package”;
- c) Moreover, France and Germany have concentrated much more on the ‘praxeologic’ repertoire of NPM policy instruments, tools and methods to be implemented and have deliberately undermined the ideological dimension of these NPM borrowings (at least until the access to power of Nicolas Sarkozy): a reformism “à bas bruit” and not “à grand son de trompes”.
- d) And France and Germany have at the same time developed – or continued to develop – such major reforms as “decentralisation” and “*intercommunalité*” in France, which are driven by an endogenous rationale and not at all by an NPM-driven vision (even though the final long-range objective, or justification, of better efficiency is similar).

While going into detailed comparison, some major differences between the French and German trajectory of reform have also emerged, the most significant one being probably the “bottom-up” dynamics of NSM in Germany compared to the clearly “top-down” rationale of reform in France, a difference in the modus operandi which is unsurprising in consideration of the federal nature of the German polity and the inherited French statocentrism.

Once again, the peculiarities of each national ‘trajectory’ of administrative reform across European countries, a phenomenon already enlightened by the synthesis from Pollitt and Bouckaert (2004), with which we are in line, are remarkable. Contemporary governmental programs of administrative reform, even though they borrow many of the same fashionable ideological and praxeological features of the NPM repertoire, are subject to a true phenomenon of differentiation in the ways and means such a trans-national NPM policy repertoire is acclimatized into localised configurations. Such differentiated acclimatizations can be summarized as complex interactive processes of embedding, involving so many institutions, groups and individuals in a given localised context, which/who both incorporate the neo-managerial repertoire – socialization process – and/or develop some strategic usages of this constraining-habilitating set of resources for action – mobilization process. As a result, reform programs do exist in continental countries like France and Germany, but have entered there into combination or hybridization effects with major inherited features of each national/local politico-administrative culture in such a way that each national institutional order remains more of a ‘paraphrase’ of itself than of a ‘copy’ of cross-cultural global standards (to re-use the metaphors of Clifford Geertz 1973, as regards Bali).

On the solid ground of such observations, the next question to come – which is actually already posed in the literature (Bouckaert 2006; Eyméri-Douzans, Pierre, 2011) – is to wonder whether a post-NPM/Neo-Weberian mixture is emerging or not.

Since a complete “paradigm shift” from the Weberian bureaucracy to a managerial NPM-administration has insofar not occurred anywhere, since all countries are, like France and Germany, acclimatizing more or less the NPM repertoire and combining it with their inherited institutional and cultural features, since many administrations tend to implement NPM-inspired managerial structures and instruments in a non-“managerial” and rather formalistic way, since a re-emergence of bureaucratic Weberian administration is observable here and there (see Drechsler 2005), a sort of avatar of post-NPM neo-bureaucracy could possibly emerge. But whether such a “Neo-Weberian” mixture of bureaucratic and managerial elements will finally work still remains to be seen.

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