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# Design and Implementation Mismatch in Integration Policies: A Case Study of National Rurban Mission in India

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#### Abstract:

Integration policies have emerged as a response to fragmented governance action post-NPM and participatory governance reforms across multiple sectors such as social development and rural development in both the developing and developed world. Despite the attention these policies have attracted, their implementation has been a failure, as recent reviews suggest. We examine a case of integration policy implemented in rural development in India, the National Rurban Mission, at multiple levels using interviews, secondary data, and document analysis. Findings suggest a mismatch between policy design and policy implementation of integration. Limited incentives for integration and overtly designed procedural policy instruments lead to efficiency and effectiveness tradeoffs during policy implementation. Findings imply the importance of overcoming the barriers to policy implementation of integration policies during the policy design phase.

**Key Words:** Policy Integration; Coordination; Policy Design; Policy Implementation; Rural Development

#### Introduction

Integrated policy strategies or policy integration have increasingly been adopted by government and international agencies to address cross-cutting problems (Bogdanor 2005; United Nations 2015; Candel and Biesbroek 2016; Cejudo and Michel 2017). Recognizing the challenges of fragmented government action post-NPM and participatory governance reforms, policy integration has emerged as a critical response to de-centering government (Peters 2005). Integrated policies are explicit governmental attempts to address cross-cutting concerns – such as rural development— in a holistic manner by concerted policy-making efforts across sectors and levels of polity (Candel, 2017). The existing research on the implementation of integration policies has identified several factors for poor implementation and necessary conditions for effective implementation (for a review, refer to Candel, 2017). One of the key factors for effective implementation is strong structures and procedures for coordination among agencies. However, existing literature has not paid enough attention to its adverse effects. Using a case study of the implementation of integration policy, we highlight the gap between the design and implementation of integration policies and the damaging effects of strong structures and procedures for coordinating.

We examine a case of integration policy implemented in India for rural development known as National Rurban Mission (NRuM) launched in India in 2016. NRuM aims to develop a cluster of villages by integrating policies and programs along 14 desirable components. The program is implemented across 298 clusters covering 254 districts across India. The program is implemented by creating a network of agencies at the national, state, district, and cluster levels. We examine the design and implementation of the program in the state of Harayana using a descriptive case study. The data was collected through interviews at the national, state, district, and cluster level. A total of 14 interviews were conducted, along with two direct observations. This was complemented with secondary data from reports, websites, newspaper articles, and published and unpublished papers.

Findings suggest an integration and efficiency tradeoff clearly in the design and implementation of the program. For effective integration, the involvement of multiple agencies and programs is necessary; however, the process can be daunting due to time and effort. A small budget for integration provides limited incentives for undertaking efforts for policy integration, and multiple levels of implementation, approvals, and little managerial support serve as disincentives for undertaking real policy integration. Findings suggest a mismatch between integration policy design and policy implementation.

The paper contributes in the following manner. First, it contributes to the limited literature on the implementation of integration policies in the developing world. Second, it highlights the adverse effects of overtly structured coordination systems and process, which has received limited attention in the literature. Finally, it highlights the efficiency and effectiveness tradeoff in implementing integration policies.

#### **Theoretical Review:**

The complexity of the problems faced by policymakers has been increasing with a growing number of wicked problems and changing societal and economic landscape (WEF 2015). The evolving nature of the problems has brought the importance of policy integration to the forefront. During 1980-2000 reforms in public policy and public administration led to governments across the globe, including in the developed world, favoring the idea of devolution, disaggregation, and specialization (Hood and Dixon 2015; Moynihan 2006). Under these reforms, the idea that dominated is decentralized governance, single-purpose organizations, and specialized units would make government more efficient, responsible, and accountable. However, the negative effects of these reforms soon became evident as these reforms left public administrative systems fragmented, compartmentalized, and under-coordinated (Christensen and Lægreid 2007; Halligan et al. 2011). A fragmented, siloed public organization with limited horizontal coordination found it challenging to control and influence public organizations in addressing problems that cut across boundaries. To address the issue of fragmented government action, several approaches have been advanced, such as policy coherence (Peters 2015), policy coordination (Peters 2018), policy integration (Cejudo and Micheal 2017), joined-up government (Peters 2015); holistic government or whole of government (Christensen and Lægreid 2007).

The concept of 'policy integration' was first used by Underdal (1980) in the context of integrated marine policy. However, the terms policy coherence, coordination, and policy integration are used interchangeably. Coordination has always been a problem in the public sector (Jennings 1994; Seidman and Gilmour 1986); however, the NPM and participatory reforms have further accentuated it (Peters 2005). Peters (2005) identified four types of coordination. First is negative coordination (Scharpf, 1994), involving government organizations and programs merely getting out of each other's way and producing negative interactions among themselves. Second positive coordination involves moving beyond simple mutual recognition of programs to finding ways to work together to provide better client services. Third policy integration-- involves moving beyond coordinating not only the delivery of services but also the goals being pursued by public organizations. Fourth is strategy coordination which requires strategies that will not only cut across the usual organizational lines in government and produce substantial agreement on general goals among public organizations but also have a clear vision for the future of policy and government and the future of the policy areas involved. 6 Peri (2004) also classifies policy integration as a type of coordination, while Nordbeck and Steuer argue that coordination is a process, whereas policy integration is an outcome of the governance. However, Cejudo and Micheal (2017) argue that coordination, coherence, and integration are essentially related but distinct processes. Cejudo and Micheal (2017) define coordination from an inter-organizational perspective as a process whereby "members of different organizations define tasks, allocate responsibilities and share information to be more efficient when implementing the policies and programs" (Pg 750). In contrast to the inter-organizational context adopted while defining coordination, policy integration is defined from a decision process perspective among a set of agencies. Cejudo and Micheal (2017) argue that policy integration is more than the sum of coherence and coordination as it goes beyond making policies and organizations compatible and articulated. Cejudo and

Micheal (2017) define Policy integration as the "process of making strategic and administrative

decisions aimed at solving complex problem.... by a goal that encompasses- but exceeds-the programs and agencies' individual goals" (P 745). Therefore, policy integration generally implies a new strategy, a new mandate, or an overarching policy by which organizations and policies work under a new logic subordinating their objectives to a new overall goal (Cejudo and Micheal, 2017). According to them, in practical terms, policy integration implies that at each stage of the policy process, the decision-making body adopts the logic of addressing complex problems. The essential attribute of policy integration includes a decision-making body in charge of addressing a complex problem and the capacity for deciding over instruments needed for addressing the problem.

Candel and Biesbroek (2016) identify four dimensions of policy integration. First, the particular problem is perceived as a cross-cutting problem and therefore adopts a holistic governance approach rather than a sub-system perspective (Candel and Biesbroek 2016; Peters 2005). Second, all possibly relevant sub-systems are somewhat involved in addressing the problem with a high level of interaction. Third, policy goals for addressing the complex problem are embedded across all associated policies with a high level of policy coherence. Finally, comprehensive cross-subsystem instrument mixes are adopted with a broad range of procedural instruments at the system level, including boundary spanning structures that coordinate steer and monitor subs-systems efforts.

Therefore, integrated policies essentially require a decision-making body with authority over the components of the whole new strategy or policy (Cejudo and Micheal 2017; 2015). This decision-making body has the authority to redefine the target population, program design, financial resources, and tools and mechanisms for addressing a complex problem. The implementation of the integrated policy would thus require coordination, institutional capacities, financial resources, timing, and context. Therefore, four levels of policy integration have been identified depending on the capacity, authority, and information available to the decisionmaking body (Cejulo and Michel, 2017). When the decision-making body's capacity is limited to making operational and design aspects of instruments, it could be considered the first level of policy integration. In addition to the first level of policy integration, if the decision-making body can reallocate the responsibilities and resources that the organizations and programs already have, it could be considered the second level of policy integration. Finally, at the highest level of policy integration, the decision-making body has the capacity to use and modify the existent instruments (programs and agencies) and create or eliminate them. Therefore for doing the policy integration, the decision-making authority requires the information to know which pieces need to be adjusted and the authority to be able to mandate the execution of those adjustments.

Though integration policies are widely adopted, their performance is poor, as suggested by a recent review (Candel, 2017). Out of 18 performance reviews of integrated policies, only two studies were conclusively found to be successful, while ten were reported to be failures and six were reported to have a mixed picture (Candel 2017). Poor implementation is the prime reason for the failure of integrated policies (Candel 2017). At one extreme, the integration policy may not be implemented at all (Begg and Gray 2004), or it may be implemented with the involvement of very few sub-systems. Furthermore, the implementation may not involve all levels of

government as only central level agencies are involved, and local agencies are ignored (Nilsson et al. 2009). Finally, the policy instruments may not be adjusted as intended (Nilsson, Eklund, and Tyskeng 2009).

Several reasons could be attributed to the poor implementation of the integration policy. First, the integration policies may be poorly designed. For example, the integration policy may be poorly designed with limited stakeholder input (Drimie and Ruysenaar, 2010), and strategies may have vague goals and instruments, leading to un-clarity among implementers (Nilsson, Eklund, and Tyskeng 2009). Second, as in many cases, the integration policies are layered on top of the existing sectoral policies. Therefore, the sectoral priorities may dominate and lead to a lack of willingness or ability to coordinate sectoral efforts. These problems get further compounded if sub-systems have unclear roles or responsibilities or lack of ownership (Casado-Asensio and Steurer 2016).

Additionally, there may be coordination challenges across governance levels, most notably in federal systems such as India, where states may perceive these policies as an imposition on them (Steurer and Clar, 2015). Fourth, the lack of political will or prioritization may hamper the implementation of integration policies due to low-political salience and low levels of political incentives (Begg and Gray 2004; Schout and Jordan 2005). Fifth, poor implementation may also be due to limited institutional capacity and resources. Howlett and Saguin (2018) suggest low political and moderate operational capacity but high analytical capacity. Further, there may be no dedicated funds for joint projects and programs (Vince 2015). Finally, the poor implementation may be due to the overtly use of soft instruments rather than hard instruments for coordination (Pollack and Hafner-Burton 2010). In fact, one of the keys to effective implementation of integrated policies is strong structures and procedures for coordinating along with political backing (Candel 2017). This includes strictly centralized and enforced politically supported guidelines (Pollack and Hafner-Burton 2010).

Though the importance of structures and procedures for coordination is highly emphasized in making the integration policies work, the same structures and procedures, if overtly designed, may lead to poor implementation if there are not enough incentives for coordination. However, little attention has been paid to the adverse effects of the structures and procedures of the coordination in case of the integration policies. Using a case study of NRuM, we highlight how overtly rigid structure and procedure of coordination coupled with limited incentives to cooperate lead to poor outcomes.

# Context: National Rurban Mission in India

According to Census of India statistics, around 68% of the Indian population lived in rural areas in villages that are not stand-alone settlements but part of a cluster. SPMRM program aims to tap the economic potential in the clusters by developing economic, social, and physical infrastructure facilities through a cluster-level concerted policy directive. Launched in 2015, the mission aims to develop 300 Rurban clusters across all states. A 'Rurban cluster' would be a cluster of geographically contiguous villages with a population of about 25000 to 50000 in plain and coastal areas and with a population of 5000 to 15000 in desert, hilly or tribal areas. 70% of the funding for the project comes from the mobilization of resources from the existing schemes, and the federal government provides the remaining 30% of the funding as a critical gap funding (CGF). The designers have outlined

fourteen desirable components (see appendix-1); however, states have a leeway to choose the components based on the need analysis of the cluster.

An elaborate institutional structure is set up at the district, province, and national level for project implementation, comprising agencies in the public sector, experts, short-term consultants, and academic institutions, as seen in the table-1. To provide overall steering to the program ministry, the national level has set up a National Mission Directorate (NMD) with the joint secretary heading the directorate. To support NMD, a National Mission Unit (NMU) was set up. The unit consists of 6-7 staff with a National Mission Director. The NMU acts as a program management unit by assisting in strategy, implementation, state coordination, monitoring, and ensuring that activities are completed according to the program guidelines. The third key agency at the national level is the National Level Empowered committee (NLEC). NLEC is the approval body to ensure policy integration and is responsible for approving the Integrated Cluster Action Plan (ICAP) and Detailed Project Report (DPR), key planning documents for policy integration at the cluster level. NLEC comprises representatives from various ministries such as Agriculture, skill development, petroleum and natural gas, education, health, drinking water, and sanitation. The NMD also takes the help of expert groups as and when needed.

#### Insert Table-1 here

At the state level, the Department of Rural Development identifies an individual as nodal personnel for implementing the state Nodal Agency (SNA) program, which may belong to either Department of Rural Development or other departments. SNA also appoints a State Technical Support agency (STSA) to provide technical support and fieldwork consultation in preparation for ICAP. ICAP is a key document covering baseline studies outlining the requirements of the cluster and the critical interventions needed to address these needs to leverage the potential of the clusters. The STSA could be either based on the list suggested by NMD or on the state government's choice. Another agency at the State level is State Level Empowered Committee (SLEC) similar which plays the same role at the state level as the role played by NLEC at the national level. The SLEC is headed by the state's Chief Secretary and representatives from various departments.

At the district level, the District Commissioner (DC) steers the scheme's implementation along with other programs. The District Project Management Unit (DPMU) supports the DC in providing management support and consists of regional planning, convergence, and rural development and management professionals. In addition, District Level Committee (DLC), created at the district level, consists of officers from the line departments and the Sarpanch of the concerned Gram panchayat for convergence of funds, district-level coordination, and implementation monitoring. Finally, at the cluster level, for each cluster identified, a Cluster Development and Management Unit (CDMU) is established consisting of professionals in spatial planning and rural management to closely monitor ICAP preparation, DPR preparation, and implementation of works in close coordination with the Block Development Officers (BDO) and Panchayat Raj Institutions.

The Implementation process can be divided into four distinct stages- Selection of a cluster, Preparation of ICAP, preparation of DPR, and finally, completion of actual work. For the cluster selection, the NMU, based on the guidelines, provides a list of sub-districts and sends the list to the SNA. Guidelines for selecting clusters are enumerated based on the demography, economy, tourism

& pilgrimage significance, and transportation corridor impact. At the provincial level, SNA finalizes the list of clusters with support from STSA, including consultation with authorities at the district level and panchayat level. The SLEC then approves the selected cluster, and hence the finalization of the cluster thus rests with the state-level agencies.

Once approved by the SLEC, the selected clusters are sent to the Ministry of Rural Development along with notifying these clusters as planning areas. As per the guidelines, the interventions need to be related to 14 components, and at least 50% of the proposed amount should be for the economic activities. First, after selecting the cluster, NMD releases 35 lakhs for preparing ICAP and other administrative activities, including hiring STSA and setting up CDMU. Then, in coordination with BDO, CDMU and panchayat level representatives, STSA conducts a deficiency or need analysis of the cluster. According to 14 components, interventions are selected in consultation with gram panchayat and BDO. The STSA largely drives the preparation of the ICAP, and they engage in fieldlevel consultation with the District Commissioner, Department level officials (department committee), SPMU, BDO, and Panchayat Raj Institutions. The convergence specialist facilitates which intervention can be funded from which department under which scheme. A resolution then approves the selected interventions at the gram panchayat. The STSA prepares the ICAP and sends the ICAP to DC. DC approves and sends it to the SNA. SNA checks it and presents it to the chief secretary. SLEC then approves the ICAP. The SNA then forwards the approved ICAP to the NMD and NMU. NMU analyses the appropriateness of the ICAP according to the program guidelines, and if there are any discrepancies, it seeks clarifications from SNA. Finally, the ICAP is presented to NLEC for approval. NLEC approves the ICAP and, if needed, can consult with an expert group formulated at the national level. The process suggests the criticality of institutional structure, especially at the state and cluster level, such as Rural Development experts and convergence specialists.

Once ICAP is approved, SNA, SPMU, CDMU, and DLC prepare a Detailed Project Report (DPR). The actual preparation of DPR includes the costing of the interventions. The officers do this in departments at the district level. The CDMU coordinates the department-level officials and prepares the DPR by the district-level committee. The key part of the DPR is identifying what is included as part of the convergence that is funded by the existing programs and what could be funded by CGF. First, all the interventions are listed, then what interventions could be funded by the existing programs is identified, and the remaining interventions are covered through CGF. This DPR is then sent to the DC, and from the DC, it is forwarded to the SNA. The DPR is first approved by SLEC and followed by the NLEC, and once approved, the respective agencies initiate work at the cluster level.

Once the DPR is approved, the department-level officers carry out the actual work in the district. This includes designing and granting contracts, monitoring the work, and fund utilization certificates. However, there are no separate guidelines on contracting and monitoring or fund utilization of the works completed under NrUM; the works get completed according to the existing process in other schemes. The tables-1 presents the institutional structure for implementing NrUM at the national, state, district, and cluster levels. The table also provides the details of the responsibility and authority of agencies.

NrUM is a program for coordinating rural development similar to smart city programs. This requires coordination across departments at the national, state, district, and cluster levels to coordinate rural development activities. The program has developed incentives based mechanisms to foster horizontal

coordination between departments at the district and sub-district levels among rural development programs. The coordination mechanisms are implemented by creating a horizontal network at national, state, district, and cluster levels. Support units at national, state, district and cluster levels are created to have vertical coordination and provide support to horizontal networks. The decision-making process in the particular horizontal network is consensus-oriented; however, hierarchical decision-making exists between various levels of the network.

# Methodology

The paper examines the policy implementation of policy integration policies. The research objective required using an explorative approach and understanding the interaction between different stakeholders from multiple perspectives using a case study design, which is considered an essential tool in opening the black box of dynamics systems (Yin 1994, 2002-2008). The case study method illuminates a decision or set of decisions (Schramm 1971). It allows for multi-perspective analysis where the researcher considers not just the voice and perspective of the actors, but also the relevant groups of actors and the interaction between them (Yin 2008). We selected a single case study of one cluster and examined the policy design and implementation process at four levels- National, State, District, and Cluster. In addition, we selected one of the clusters in the State of Haryana.

In this case study, the dependent variable is the implementation process. All the national, state, district, and cluster stakeholders were interviewed. The primary data sources are face-to-face interviews, informal discussions, and direct observation. In total, 14 in-depth interviews were done in the selected comprising around 63 hours of data (refer to Table-2). In addition, direct observations of meetings, one at the state and another at the district level, were done.

#### Insert Table- 2 here

This qualitative data (interviews \ Observations) was complemented with secondary data, program data provided by agency and ministry, reports, concept notes, published and unpublished articles, data published on the official website, and newspaper reports. Data collection was completed between May –December 2018. A separate interview schedule was prepared for each stakeholder in the scheme, and anonymity was ensured to get a candid response from the candidates.

Critical incident technique was used to collect and organize data. The critical incident technique is a useful exploratory method for increasing knowledge about little-known phenomena (Gremler 2004). It maps micro-level incidents and facilitates the reduction of complex qualitative data (Chell and Pittaway 1998). Using this approach, the first six critical events in the program implementation were identified: selection of cluster, preparation of ICAP, approval of ICAP, preparation of DPR, approval of DPR, and execution of the intervention. Each implementation milestone of the program was then organized on the following dimensions: Policy guidelines and appropriateness, implementation process and its appropriateness, deviations during implementation and reasons for the same, coordination process, challenges in coordination, and policy integration. For each theme of a critical event, all the stakeholders were asked to share their perspectives, allowing multiple perspectives on each theme in a critical incident. This improved the validity of the data collected.

# **Results and Findings:**

## **In-coherent Conceptualization of Policy integration:**

The conceptualization of policy integration uses statistical considerations and population household size while selecting clusters for policy integration. However, villages that form a cluster cannot be considered purely based on statistical consideration. More than a statistic, geographic considerations need to be taken into account. The current statistical approach leads to clusters that are not geographically congruous. For example, one of the respondents observed, "Villages get selected without any geographic continuity" (NMU Officer). Further, during the preparation of ICAP, there is "hardly any analysis of how one intervention is creating synergies with other intervention... suppose there is an investment for a road. In that case, there is no analysis of how much is the road accessible to the whole cluster". Rather than planning the integration and the whole focus is on the "process of implementation and completion...the whole project is behind the financial, but the financial is nothing to do with this whole integrity" (NMU Officer).

# **Deficient Institutional structure and process for Policy Integration:**

The institutional structure for the policy integration is sparse and underprepared. A single individual heads the NMD, and it's not something like a body. The NMU is understaffed, and they end up doing a lot of activities that are supposed to be done by the NMD, like preparing answers for the parliamentary questions. One of the respondents said, "many works which we are not supposed to get delegated to us." In the absence of a management information system and clear work process, NMU officers spend 80% of their time on routine tasks leaving limited scope for any analytical work. Similar is the situation of the SNA as the appointed officer at SNA is looking after multiple programs and therefore finds it difficult to allocate the required time for steering this program at the state level. STSA empaneled to provide technical support, were not interested in these activities, and some complained that their charges were excessive. In summary, at the state level, there is no dedicated officer to steer this program.

#### Insert Table-3 here

At the district level, the DC steers the program along with 100 other programs, with many programs having budgets multiple times that of NRuM. Compared to other programs that have dedicated Project Officers (PS) and Assistant project officers (APS) who brief DC about the program, in NRuM, "there is no such institutional structure at the district level for NRuM..which can steer the program at the district level" (NMU officer). In many states, the DPMU is almost non-existent or, at the most, will have one rural management professional. The DLC hardly takes an interest in implementing the scheme because of the small amount of funds received from convergence. They have limited acceptance for STSA who are involved in preparing ICAP as "there is limited acceptance of agency coming from outside" (SPMU officer). Department does not provide enough support as they feel "the outside person is asking us to do things and asking to provide this and that" and therefore continue delaying activities until there are instructions from the top (SPMU Officer). The District level committee primarily relies on SPMU to carry out most of the activities "They do not have time and that's why we are employed" (Officer from SPMU). Though the district committee and DC are

expected to carry out most of the activities at the district level, they have a limited understanding of the program, guidelines, and requirements. They ultimately rely on supporting teams such as SPMU, DPMU, and CDMU to implement the implementation process.

At the cluster level, three institutional arrangements – Cluster level committee, CDMU, and PRI's are expected to implement the programs. CPMU provides managerial support for implementing the program to the cluster level committee and BDO. However, in many places, there is only one officer in the CDMU rather than a minimum of two. States complained that the "funds which are given for administration are insufficient to them to hire staff" (NMU Officer). Their primary role is to support the preparation of ICAP and DPR; however, the department delegates many of their tasks to them. For example, regarding DPR preparation, the department relies on CDMU to coordinate the whole activity. However, in many cases, computer operators prepare the estimate for the work as "In most places, the computer operators do the most of work" (CPMU officer).

# **Design Issues in Integration Policy:**

First, the policy focuses on identifying the gaps in the cluster from cluster-level representatives. However, these gaps may not meet the needs of the policy integration as the demand of the people at the cluster level may not be integrated. For example, one of the policy guidelines is that 50% of the expenditure should be on economic-related activities. However, when asked, people "want if a road can be built connecting their house or a tap water can be installed or if they can get an office" (NMU officer). So the vision of the policy doesn't get translated at the ground level. So rather than focusing on the gap analysis, the focus should be on need analysis.

Second, the policy design overtly relies on too many procedural instruments and therefore includes several steps for completing any process. "The number of the steps in planning, whether ICAP or DPR or approval process, is too many; there is a need to simplify that. For example, we go to SLEC at the state level at least three times. First, we select the cluster and go to SLEC for approval, prepare ICAP and then go to SLEC for approval, prepare the DPR and go to SLEC for approval, three times SLEC approval in a program, it is taking too much time. Because of numerous steps involved at every stage and low amount of funding the implementation tempo gets delayed and stakeholders lose interest" (NMU Mission officer). The number of approvals also reflect poorly on the trust that government has in its own officer and systems.

Third policy design issue is low funding for the program. On the one hand, the central budget is too limited even in terms of covering administrative expenditure, which has stifled the hiring of the management staff at the state, district, and cluster levels. Further, the scheme design provides 15 Crores for tribal and hilly areas and 30 crores for non-tribal regions; however, the cost of raw materials and construction is much higher in tribal and hilly regions. In the present fund release system, the cluster gets 30% of the CGF (equivalent to 2.7 crores) after the preparation and approval of ICAP, which includes multiple steps. The state government departments consider this amount received from the center not worthy of their efforts given the efforts required.

Fourth, policy design that makes implementation cumbersome and complicated is the lack of uniform program guidelines for various interventions included under the program. The NRuM program includes varied and multiple interventions that can be included under the program by a given cluster. Though multiple activities and convergence of activities is included but each intervention is expected to follow the respective program guidelines under which that intervention is funded. "If a toilet is

built, it needs to follow the guidelines of Swatch Bharat Abhiyan.. if a road is built, then it needs to follow the guidelines of the Pradhan Mantri Gram Sadak Yojana; if a public health center is built, it needs to follow the guidelines of the National Rural Health Mission. so this makes it very difficult as there are no uniform guidelines that need to be followed" (NMU Officer).

Fifth, the program design emphasizes decentralization by providing cluster-level organizations to select interventions during ICAP preparation. However, the guidelines first restrict this choice by limiting interventions related to 14 components and then imposing that 50% of the funds must be spent on economic activities. During this program implementation, this devolution of authority is further restricted by creating several levels of approval authorities and therefore re-centralizing the decision-making in this program. For example, during ICAP preparation, the first draft prepared by the STSA PRI and CDMU is approved by District Commissioner. Then they are sent to SNA, and after approval from SNA, they are sent to SLEC for approval. After SLEC approval, they are sent to the NLEC for approval. One of the National Mission Officers said, "The program designs ask to prepare ICAP and DPR at the district level, but for approval, it goes up to the national level. That also for such a small amount (30 crores). It would have made sense, if the amount is 2-4 thousand crore".

# **Challenges in Policy Integration during Policy Implementation**

One of the first steps in implementing the policy integration is preparing ICAP. The STSA is supposed to lead the process with discussion with state-level agencies (SNA, SPMU), district and cluster level agencies (DPMU, DC, and CPMU, BDO), and PRIs along with experts, including rural development experts and convergence specialists. The central part of preparation happens at the cluster level along with BDO, CPMU, and gram panchayats. However, one of the officers of the NMU commented that "some of STSA's have formulated the plan sitting in their AC rooms, they then visited the field and were not aware of the ground realities." One of the officers commented we are not sure "whether they were actually done survey by going in the field and collecting the primary data or they have simply taken data from the secondary sources and just put up something, to reach CGF of 30 crores. We are not sure about that" (NMU Officer).

Second, for the policy integration to be implemented, the concept of integration must be practiced while selecting the interventions. At the ground level, interventions needed are identified by the PRI. In practice, head of the gram panchayat asks each village head what is required for their village and during these discussions, the interventions are decided. However, while selecting interventions, rather than focusing on what is overall required for the cluster, the interventions are chosen by each village head based on the needs of their specific village, which may not have any synergistic effect with the interventions selected by another in the same cluster. During the discussion on interventions, if village heads do not know the list of possible interventions, suggestions may come from BDO and rural development experts; however, in most places, these experts are not hired, or even if they are present, the STSA may not take them along. So in practice, villagers select the interventions based on their understanding and knowledge, and as a result they often focus on housing, road, etc., rather than economic activities, which is the thrust of the program. One of the officers suggested that "when we ask a villager, what do you want. He will say that we all want our own house, want a road, I should get the house through Indira Aawas, should get road, should get water. They won't think about economic activities". Therefore, the whole process depends upon the institutional structure at the cluster and state level to make policy integration happen. For effective policy integration, the presence of rural development experts and convergence specialists is critical as they can provide insights on the critical interventions needed and the convergence of various schemes. However, at present, the staff has not been hired so far.

Third, at present, the guidelines do not include any standards for participation in terms of attendance of village members and minimum percentage of votes for the selection of interventions. In the absence of these guidelines and consequently lack of monitoring of participation at the village level, the implementation process doesn't ensure participation. Several studies in the past have highlighted the elite capture in gram panchayat; therefore, it is very likely that the selected interventions may primarily serve the interest of the elites.

Fourth, the critical execution part of policy integration is allocating funding for interventions, also known as convergence. Ideally, a large number of interventions should be covered by existing programs, and the remaining should be covered by the CGF. It was expected that new programs/interventions that are under 14 components could be selected and then funded by the existing programs under convergence. However, in practice, already ongoing interventions get listed as funded through convergence. One of the NMU officers observed, "So when we go to the field, we will find that convergence interventions are already ongoing activities and not something new." This defeats the overall purpose of policy integration, as in practice, it does not lead to identifying interventions that lead to integration and synergistic effects.

Further, the process of DPR preparation starts with a cost estimation of various projects included in the ICAP, contracting for the works, and supervision and monitoring of activities. The cost estimation details need to be done by department officers belonging to the cluster committee. Still, in many places, "computer operators do the most of the work" (Officer of CDMU). The location of the work is also gets influenced by the political leaders.

#### **Leadership and Program Implementation**

First, in the present policy design, the selection of the target sits for policy integration (identification of clusters) is based on technical considerations and the potential for policy integration. However, political and local considerations play an important role in the selection of target sites. Many times clusters get selected that have limited potential for benefiting from the policy integration. For example, one SPMU officer suggested that "the clusters that already have good economic growth such as 24 hours piped water. Those get selected rather than those where the potential for economic growth could be improved by this policy". To some extent, political interference is also a reason for wrong choice of clusters, as political leaders influence the choice of clusters. Ministers playing a role in selection of clusters "varies from state to state as in some states principal secretary has the power to approve, while in others it is up to the minister, and at times there were some cases where minister has changed the cluster" (NMU Officer). Though the NMU based on the cluster selection guidelines tries to resist these political pressures, however many times it is beyond their scope as one of the officers reported "Minister wants that my cluster is selected and if it comes from Chief Minister then we have to do it" (NMU Officer).

Second, the performance of the program critically depends upon the steering of the program at the national, state, district and cluster level. However, across the levels, the nodal officers responsible for

steering the program are overburdened with multiple programs. Given the small budget and complexity, this program doesn't get the priority that it deserves. Challenges to implementation are numerous-complexity of the program, involvement of multiple actors, multiple levels of involvement, multiple type of interventions, complex funding pattern but biggest among them is getting them all together" (NMU Officer). At the national level NMD headed by the joint secretary is responsible for multiple program. Further, NMD has seen, three times change of the secretary and with "the change of the person, orientation, priority and program everything changes. They just don't handle one program as joint secretary and are involved in multiple programs (NMU Officer). One of the respondents said "a lot depend on both ministry priority and government priority. Second thing the person in charge of the program, a lots depends on him. If he is go getter than he can get it done." (NMU Officer). Similar is state of affairs at the state level. Implementation at the state considerably depends upon the SNA. It is the "SNAs competencies vision, drive to implement the program and ability to coordinate with the other agencies determines how well the program does at the state level" (NMU officer). However, SNA doesn't have the responsibility of implementing only this program as they are generally responsible for managing several other programs. Similarly, at the district level district commissioner is responsible for overseeing 100 of other programs. "At times as a district collector... how many things he has to do per day. Humanly it's not possible for him to monitor each & every program. Even if he does one meeting for one kind of activity in a month, his whole schedule will go for meetings only. We need to have the task really clearly cut out for each & every stake holder and whatever resources & whatever capacity, competency needs to be built." (NMU Officer).

Overburdened key implementation agents develop apathy towards the implementation of the because of the limited priority placed on the program from top and diffused accountability. Across the level – national, state, district, cluster- an apathy towards implementation of the program was reported. The problem is that key nodal persons at the national, state and district level in the program are so overburdened with multiple responsibility there is very limited time and attention they can pay to this program. Given a small amount funding this program is easily sidelined in the light of larger programs with large funding and less complexity. "Due to order from the top, the committees get created very easily, but getting the committee to meet, and moving the implementation process forward is challenge and that is not happening" (National Mission Officer). Everyone has left the program implementation on young professionals both at state as well as district level. The management support teams take initiatives plan things and get things done. They also do so when there is push from national mission. The management support teams are also inexperienced and immature to handle things. At the district level, the same apathy towards program implementation was observed. The state and district level functionaries are unaware about the program and its guidelines even after two vears of the implementation. One of the officers at SPMU said "even the SLEC doesn't know about the details of the scheme. There have been no meetings and no education on the program guidelines and requirements. No one knows what is their responsibility. Unless the working of the department level at the state is addressed the implementation of the scheme will be poor". To add to that is frequent transfer of staff at the ground level, which makes work difficult as it takes time to understand the scheme and process and by the time one understands it, he is transferred, specially BDO" a key nodal person at the cluster level (NMU Officer). Same thing applies to department level staff as the "key focus at national mission is compliance with the program guidelines. Nobody is worried what is happening, as everybody is working simply to ensure that we meet the program guidelines. Meeting deadlines in terms of ICAP DPR" (Officer SPMU).

To reduce the burden of the key nodal officer and provide them management support, a management support system is envisioned in the program. However, at present the management support available

to implementation across the levels can be considered as poor. Many states do not have management support staff at the state and district and cluster levels. Even at the national level, the national mission unit is understaffed and have poorly developed systems for execution. They are not able to use their analytical skills because majority of their times goes in firefighting and coordinating with other agencies in order to get things done. The biggest part of coordination is repeated reminders they need to send to agencies to complete the tasks; and reporting to various stakeholders about the progress of mission including answering parliamentary questions. One of the respondents said "most of the time 80%-90%, I would say, I do the routine kind of thing which ideally should not have been come to us like get this report, get this presentation, get this data, get this information". "We feel our skills are not being utilized here"

#### Insert Table-4 here

Diffused accountability also contributes to apathy towards program implementation (See table-4). At present given the complexity, multiplicity of interventions, involvement of multiple levels, involvement of multiple stakeholders and multiple implementation steps, the accountability is highly diffused. Further, given the involvement of multiple stakeholders, and multiple levels, all with different priorities it is very easy to shift the blame. Diffused accountability could also be attributed to poor implementation monitoring of the program.

The program implementation started without any monitoring framework and systems put in place. "MIS should have been prepared earlier only, at least 2 years before but I have to take out some time and that's how somehow it was created". There is no centralized database or data-system, therefore the management support units monitoring the implementation have to "keep on manually organizing and retrieving data again and again" (NMU MIS officer). As a result, the management support teams spend enormous amount time and they end up "doing the same thing again and again" (NMU MIS officer). Also part of the problem is existing monitoring framework approach itself. A robust monitoring framework has not emerged because of the diversity of interventions undertaken under the mission. The monitoring framework is considered as "primitive' as only primary information related to number of works completed, relevant photographs, and the amount of financial expenditure is collected (NMU mission officer). The other things include, number of human resources placed and the preparation of ICAP and DPR. The other aspect of monitoring is, whether the selected interventions are according to program guidelines, and whether the intervention has happened in this mission and not completed before. This is because "in this mission there are N number of activities as every cluster has different activities and therefore there cannot be a uniform monitoring framework" (NMU officer). So the present monitoring systems only focuses on the number of outputs and the financial utilization and doesn't cover the integration aspects (such as done through GIS) or quality of the interventions. Further the present MIS system doesn't allow inter-cluster or interstate comparison on the performance.

At present, the monitoring is done by a monthly progress report which is prepared at the cluster level by CPMU and then sent to SNA, The SNA complies it from all cluster and submits to NMU, and then NMU consolidates it and submits to NMD. The monthly report primarily covers the work progress and the financial expenditure details under the mission. All the information needed by NMU is routed through the SNA and no information can be collected directly from the department level officers. The state sets the priorities for example. The state says that "this five scheme are priority. So the district collector prioritizes those five schemes and other scheme run in side. So for NRuM there is

no monitoring at the state level and therefore there is no focus on the scheme at the district level. So this scheme is not in the top agenda at the state. The scheme review happens only in last, if at all it happens' (NMU MIS officer).

# **Fragmented Coordination**

The integration policies primarily rely on coordination as a core mechanism for policy implementation. However, in NRuM program though the coordination mechanisms are identified during implementation the coordination doesn't happen (refer to table 4). There is also limited coordination across agencies. NMU as per the program guidelines is expected to coordinate with NGOs, experts and various other organizations, however there is very limited coordination with NGOs and experts. Despite the program guidelines the national level expert group has not been formulated so far and there has been almost no meetings held as such. The NLEC meetings are held only for approval of ICAP and apart from that there is no inter-department coordination happening. The same is applicable for the state level empowered committee and district level committees. The actual coordination and consultation is supposed to happen at the cluster level during ICAP preparation. However, in many cases the STSA do not consult even with SPMU. One of the SPMU officers commented "we (SPMU) or the department is not there in the visit to the field with STSA. There was no discussion between us. I don't know whether they went on the field and what happened there". As there is no institutional structure at the district level in many states there has not been any recruitment for DPMU, the National mission officers can't coordinate and follow up with the district level.

For coordination, the agencies in policy implementation completely rely on the management support units. The management support units established at national, state, district and cluster level are though not officially but in practice responsible for both horizontal and vertical coordination. Their key role is to coordinate among agencies and push the agencies to get things done as per the program guidelines. Though these support agencies try to manage both horizontal and vertical coordination, however they do not have the actual authority to instruct any government agency /person /department. They rely on derived authority by approaching the higher authorities and therefore the role is primarily to convey instructions of higher authority to their sub-ordinates. Therefore, though they have taken up informally the role of coordination, in absence of any authority, they feel stuck in the complex coordination system due to multiple levels of decision making, involvement of multiple agencies. One of the national mission officer says that "The program is suffering from so many approvals. And the amount is so small. In other programs there no such lengthy and multiple approval process." In many states the SPMU keep struggling to get the officers working on the program. One of the officers of NMU said" The SPMU keeps on struggling, because everything has to be written on the file and one has to get it approved. Even for a report they have to write to a nodal officer that ministry has asked for this, this report. Then this files will go to the next level & that file will go to the next level. And then it will go to the district collector or deputy commissioner whoever is handling. Then he will move this file to that person, who is handling and then the person who is handling that things will be giving the report. So, all these process takes a lot of time".

## **Discussion and Conclusion**

Effective implementation of integration policies requires conducive implementation structure that facilitates coordination between agencies and overcomes the delay in decision making due to involvement of multiple agencies. Further funding pattern should incentivize the integration between policies and motivation of stakeholders to come out with interventions that extend beyond confines of individual policies and programs. Effective coordination is the key mechanisms for achieving policy integration however it requires strong analytical and operational capability.

Findings suggest mismatch between design of integration policy and its implementation. The integration and efficiency tradeoff emerges clearly in the design and implementation of the program. The involvement of multiple agencies and multiple programs though expected to lead to better integration but a small budget for integration provides limited incentives for undertaking efforts for policy integration. Further multiple levels of implementation, multiple levels of approvals and limited managerial support serves as disincentive for undertaking real policy integration. Consequently, the program is seen as a burden by all stakeholders. Public agencies view the program as burden and do not act until and unless they receive orders from the higher authorities. On the other hand, the support agencies responsible for ensuring implementation, view multiple agencies, multiple levels and multiple approvals as key barrier to implementation and therefore their main focus remains on getting the things completed rather than paying attention to whether there is integration or not. Consequently, rather than real integration, the interventions by individual departments are repackaged as a basket of integrated intervention under the program. Though the key nodal agency poses required analytical and operation capabilities, low priority given to the scheme limits them to paying attention to the program. Similarly, though the management support agencies have sufficient analytical and operational capability because of the poor process design of the scheme, they spend most of their time in repetitive, ordinary works with limited time remaining for any analytical work.

Though the importance of structures and procedures for coordination is highly emphasized in making the integration policies work, however the same structures and procedures if overtly designed may lead to poor implementation if there are not enough incentives for coordinate. However little attention has been paid to negative effects of the structures and procedures of the coordination in case of the integration policies. The case of NRuM highlights the how overtly rigid structure and procedure of coordination couple with limited incentives to cooperate lead to poor outcomes.

For improving the design of the program NRUM can take several steps. First, the number of steps in the process of ICAP and DPR preparation needs to reduce to speed up the process. Most important is reducing the number of approvals. Second is the concurrent preparation and approval of ICAP and DPR which can considerably reduce the time gap between ICAP and DPR. Third at the state level the government should set up convergence funds as in many cases the states do not have resources to meet the convergence funding leading to delay in implementation. Fourth, CGF fund has lot of components that needs to be reduced as for many components there are already schemes. Further the first installment of CGF could be increased from present level of 30% as the funding is too small to get state level departments motivated to undertake the efforts.

For improving implementation number of steps can be taken. First there is need to improve management support staffing at the cluster, district and state levels to speeding up the implementation. Second for improving the implementation in place of DC, some other person such as ADC of rural

development could be appointed as nodal officer at the district level given the extensive number of schemes DC has to oversee.

The findings contribute to limited literature on integration policies and implementation of integration policies in developing countries context. More importantly the findings highlight the mismatch between integration policy design and implementation process and adverse effects of overtly designed coordination structure.

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Table-1 Roles of Various Agencies in NRuM Program Implementation

		Roles of Various Agencies during Project Implementation Phases					
Levels	Agencies	Selection of Cluster	Preparation of ICAP	Approval of ICAP	Preparation of DPR	Approval of DPR	Completion of Works
National	Ministry of Rural Development	Provide Guidelines	Provide Guidelines	Provide Guidelines	Provide Guidelines	Provide Guidelines	
	National Mission Directorate	Overall steer the process	Overall steer the process	Overall steer the process	Overall steer the process	Overall steer the process	Overall steer the process
	National Mission Management Unit	Coordination & Monitoring with all states	Coordination & Monitoring with all states	Coordination with NLEC	Coordination & Monitoring with all states	Coordination & Monitoring with all states	Coordination & Monitoring with all states
	National Level Empowered Committee			Approve ICAP		Approve DPR	
	Expert Group		Preparation of Guidelines				
State Level	Department of Rural Development	Overall Authorizing Agency	Overall Authorizing Agency	Overall Authorizing Agency	Overall Authorizing Agency	Overall Authorizing Agency	Overall Authorizing Agency
	State Nodal Agency	Steer the process at state level	Steer the process at state level	Steer the process at state level	Steer the process at state level	Steer the process at state level	Steer the process at state level
	State Project Management Unit	Support SNA and Coordinate and Monitor the process	Support SNA and Coordinate and Monitor the process	Support SNA and Coordinate and Monitor the process	Support SNA and Coordinate and Monitor the process	Support SNA and Coordinate and Monitor the process	Support SNA and Coordinate and Monitor the process
	State Technical Support Agency		Steers ICAP preparation at the field. Coordinate with all stakeholders at cluster and village level				

	State Level Empowered Committee			Approve Selection of Cluster		Approve DPR	
District	District Collector / Assistant District Commissioner	Steers the process at District Level	Steers the process at District Level	Steers the process at District Level	Steers the process at District Level	Steers the process at District Level	Steers the process at District Level
	District Project Management Unit	Supports DC	Coordination and follow up of all activities at the cluster level including coordination with CPMU		Coordination and follow up of all activities at the cluster level including coordination with CPMU		Coordination and follow up of all activities at the cluster level including coordination with CPMU
	District Level Committee		Plays key role in identification of interventions that can be covered under the convergence				getting the work completed
Cluster	Cluster Development and Management Unit		, , , , , , , , , , , , , , , , , , ,				
	Block Development Officer		Acts as a nodal officer at the cluster level				Assist department in completion and monitoring of works
	Zilla Panchayat Samiti		Identification of interventions and completion of work				
	Gram Panchayat		Identification of interventions				
	Gram Sabhas		Identification of interventions				

Table 2: Data Collection

Levels	Agency	No of Interviews
National	National Mission Unit	9
	National Mission Directorate	
State	State Program Management Unit	2
	State Nodal Agency	
District	District Level Committee	1
Cluster	Cluster Development Management Unit	2
	Cluster Level Committee	
Total		14

Table 3: Coordination Mechanisms in NRuM Program

Process	Coordination Instruments				Key Responsible Agency / Key Executers		
	Guidelines	Roles and Responsibility Specification	Information Provision	Monitoring	National Level	State Level	District Level
Selection of Cluster	Yes	Yes Key actors identified at various levels	Workshops organized	Yes	Not applicable	Secretary Department of Rural development/ SNA	Not applicable
Preparation of ICAP	Yes	Yes Key actors identified at various levels	Workshops organized	Yes only includes	Not applicable	SNA/ STSA	DC/ STSA
Approval of ICAP	No	Yes Key actors identified at various levels		Yes	NLEC	SLEC	
Preparation of DPR	Yes	Yes Key actors identified at various levels	Workshops organized		-	Secretary Dept of Rural Development/	DC/ Department at District level
Approval of DPR	No	Yes Key actors identified at various levels			NLEC	SLEC	
Completion of Works	No	Yes Key actors identified at various levels					DC/ Department at District Level

Table 4: Reporting System in NRuM

Levels	Agencies	Role in NRuM	Reporting to
National	Ministry of Rural Development	Overall Responsible for the	Chief Secretary
		mission	Government of India
	National Mission Directorate	Overall Steering of the	Secretary Ministry of Rural
		Mission	Development
	National Mission Management Unit	Provide overall support to	National Mission
		Management of Mission	Directorate
		including monitoring and	
		coordination	
	National Level Empowered	Approve the ICAPs submitted	No common authority.
	Committee	by the States and approve	Report to their respective
		the	department heads
		CGF for the cluster and take	
		other necessary decisions	
		and steps to ensure	
		coordination with other	
		Central Ministries and State	
		Government	
	Expert Group	Evaluate the ICAPs before it	No Reporting Authority
		is sent to the Empowered	
		Committee for final approval.	
State Level	Department of Rural Development	Setting up of SPMU	Chief Secrratary State
		Setting of SNA	Government
	State Nodal Agency	Nodal Officer at the state	Reports to Secretary Rural
		level	Development Department
		-Identify clusters ICAP and	
		DPR	
		-Set CDMU and DPMU	
		-Implement activities	
		-Mission Monitoring	
	Ctata Duais at Managamant Liuit	-Fund management	Donasta ta Ctata Nadal
	State Project Management Unit	Support SNA to successfully	Reports to State Nodal
		run the mission on day to day basis	Agency
		Dasis	
		Coordination and follow up of	
		all activities at the state level	
		including coordination with	
		DPMU and CPMU	
	State Technical Support Agency	support in selection of	Reports to State Nodal
	State recrimed Support rigericy	clusters, preparation of	Agency
		ICAPs, spatial plans and	7.90103
		DPRs	
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	State Level Empowered Committee	Recommend/approve the ICAPs before submission to the Mission Directorate and will also be responsible for other key decisions for effective coordination and implementation of the Mission.	No common authority. Report to their respective department heads
District	District Collector	Leading the mission at the district level Acts as Nodal Officer at the District level	Reports to Chief Secrtary state government
	District Project Management Unit	Cluster focused support to District Collector	Reports to DC
	District Level Committee	Plays key role in identification of interventions that can be covered under the convergence and getting the work completed For taking decisions at the District level especially on matters concerning convergence and district level coordination	Reports to DC
Cluster	Cluster Development and Management Unit	Coordination and follow up of all activities at the cluster level Monitor the spatial planning aspects and the ICAP preparation for the cluster and will also closely monitor the progress of the activities in the cluster and provide regular updates to the DPMU/SPMU	Reports to BDO/ APO
	BDO	Acts as a Nodal officer at the cluster level	Reports to DC
	Zilla Panchayat Samiti	Provide inputs in preparation of ICAP, DPR & Completing of Works	No Reporting Authority
	Gram Panchayat	Provide inputs in preparation of ICAP, DPR & Completing of Works	Zila Panchayat Samiti
	Gram Sabhas	Provide inputs in preparation of ICAP, DPR & Completing of Works	Sarpanch