Good Governance of the Provincial Administrative Organization in Thailand: A Case Study in Phrae Province, Thailand

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ABSTRACT

Good Governance and decentralization were repeated mentioned in the public administration, especially in local government. Accordingly, they were necessary principles for Local Administrative Organization in Thailand. The paper was a part of the report of lesson-learned research regarding the Good Governance in Local Administrative Organizations in the Fiscal Year 2018: the case study of the Phrae Provincial Administrative Organization (PAO). The objectives of the study were to study the key success factors of the local administration of the PAO in implementing Good governance and to find the guidelines to improve the management of the organization. The study was a qualitative study. The key informants were forty persons from the administrative teams and the residents of the PAO. The data collection was from document research, in-depth interviews, group interviews and non-participatory observation. It was found that the key success factors that contributed to the success of the PAO were in total five factors: leadership, transparency, value and organizational culture, availability in administrative resources, and collaboration. The factors were inter-related. Therefore, the PAO should be prepared in improving the administration for the higher efficiency and effectiveness. Finally, the study suggested guidelines showing that the PAO should comply with the decentralization acts that clarify the scope of authorities and allow the flexibility in budgeting.

Keywords

Lesson-Learned, Good Governance, Local Administrative Organization, Key Success Factor

Introduction

accepted Good Governance was among public administrators and was applied to their management styles; as well as, to organizational core values. It was first mentioned in the report of the World Bank entitled "Sub -Sahara Africa form Crisis to Sustainable Growth" in 1989. The report demonstrated the importance of Governance and Economic recovery. Additionally, it explained that Good Governance was "the characteristics and the methods to sustainably manage the economic and social resources. The concept includes the participation from various sectors, Public Administration, Responsibilities, Legislative frameworks regarding the development of transparency and information" (Office of the Public Sector Development Commission, 2009). World Bank (1992) also defined Good governance as the manner in which power is exercised in the management and it related to the sustainable development. According to UNESCAP (2009), Good Governance includes 8 attributes; that is, participatory, consensus oriented, accountable, transparent, responsive, effective and efficient, equitable and inclusive and follows the rule of law. In the international sphere, many countries, including Thailand, responded to the renowned principles. In Thailand, the Good Governance appeared as principles in public administration in the Regulations of the Office of Prime Minister on Good Governance in 1990. According to the Acts, Good Governance refers to six principles. First of all, the Rule of Law means the legality and legitimacy. Rule of law is a principle under which all persons, institutions, and entities are accountable to laws that are publicly promulgated, equally enforced, independently adjudicated, and consistent with international human rights principles. The second principle, Morality, represents a code of conduct which the

people follow. In terms of Public Administration, the moral values represent the good behaviors in accordance to the rules. regulation, ethics and religions. Thirdly, **Transparency** refers to the trust building among the public officers by improving the working procedures, decision making and enforcement in a manner that follows rules and regulations. Fourthly, Participation is a principle that underlines the freedom of association and expression of the people to the public administration. It can be either direct or intermediate legitimate through institution or representatives. Good governance encourages more civic participation. Fifthly, Accountability emphasizes that either private or public organizations are accountable to the public and society. Accountability can be conducted by people by showing their awareness to rights, social responsibilities and public problems; as well as, they are interested in participating in the problems solving. Finally, Cost -Effectiveness of Economy refers to a method how people manage public resources to maximize their capabilities to make the highest benefits. Furthermore, the public entities should make the best use of resources at their disposal. (Royal Decree on Principle and procedure for Good Public Governance, B.E. 2546, 2003)

According to the Good Governance principles, one of the responsible organizations in Thailand is the Office of the Decentralization to the Local Government Organization Committee (ODLOC), of which one main mission is to develop the capacity of local government organizations in accordance with the direction of the national decentralization. The committee has a policy with an objective to stipulate the allocation of subsidies as a reward for local government organizations in order to motivate local administrative organizations (LAOs) to develop their management according to their own powers and duties in accordance with the Good governance principles and decentralization. The decentralization has its advantages; however, the organizations needs to well manage and be transparent to protect themselves from the public anticorruption assessment. Many local governments fail because the structural problems of the organization hinders them to do so. The Thai LAOs have both political officers, such as Chief executive team, and permanent public officers. Thus, the balance of power is highly required and the encouragement of Good governance implementation is indispensable. The award "Good Government Awards" stands for the way for Good governance enhancement.

The award "Good Government Awards" has been set up since 2003. The Phrae Provincial Administrative Organization (PAO) was the first runner-up in the Good Governance Awards for Local Government in the Fiscal Year 2018. However, the award granting is not only useful for the local administrative organizations that were award winners but the best practices can also be disseminated and be a prototype to other LAOs. Therefore, investigating the lessons-learned of the award-winning local government organizations can benefit other local government organizations in order to be a model and guidelines for providing effective public services. Therefore, the researchers were interested in examining the factors of management success of the PAO and in finding solutions to ameliorate their management towards sustainability for the sake of knowledge dissemination and improvement of public services of the LAOs in the future. The paper, therefore, is to study the key success factors in implementing Good Governance in management of the Phrae provincial Administrative Organization. And to suggest guidelines to improve the management of the Phrae provincial Administrative Organization. The lesson-learn from the case study will be a future guideline and shows the best practice in stimulate Good Governance in local government.

Research Methodology

The lesson-learned research regards the Good Governance in Local Administrative Organizations in the Fiscal Year 2018: the case study of the Phrae Provincial Administrative Organization (PAO) is a qualitative research to scrutinize the key success factors in implementing Good Governance. The framework of the research regards literature and past researches in accordance with the supporting factors contributing to the implementation of Governance in various organizations in different countries. The methods used in data collection were Document research, In-depth interviews, Group interview, and Nonparticipatory observation. The key Informants were stakeholders of the services produced by the PAO. The researchers selected forty purposive key informants which included 4 Chief Executives team, 7 Middle Management team, 13 Officers, and 15 Residents and partners. Document research was to study the concepts and principles pertaining to local administration principles of Good Governance and also the reports regarding the good governance assessment during the fiscal year. Furthermore, the researchers conducted individual semi-structured in-depth interviews with the PAO's administrative team: that is, the Chief Executive, the Deputy Chief Executive, the Secretary to the

Chief Executive, and the Chief Administrator of the PAO. The interviews was to profoundly investigate the research questions and to address the triangulation to the research methodology. Then, Group interview was to discuss key success factors and the development guidelines of Phrae Provincial Administrative Organization. Finally, the researchers applied non-participatory observation throughout the data collection process to gather information regarding the environmental and social contexts of the PAO. Additionally, interviewees' actions and reactions to the questions were noted.

The data were analyzed by content analysis based on the concept of Patton (2002). The meaningful speeches were quoted as the source of the interpretation along the way of data analysis. In some aspects of the interpretation, it was the explanation of the in-depth belief of the researchers by focusing on the information obtained from the informants. This study was the qualitative study. The test of the reliability of the data was then regarded as the essential thing to be carried out in order to derive the accurate and clear data. The researchers used the analysis process with the reference of the meaningful quotes and the conceptmapping technique was also used to avoid the distortion of the data. Besides, the reliability of the data was also tested (Guba, E. G. & Y.S. Lincoln. 1998) in the following sections of the study: the multiple methods technique, audit and member check technique.

The Key success factors of implementing Good Governance in management of the Phrae provincial Administrative Organization.

performance The of Phrae Provincial Administrative Organization in the fiscal year 2018 was guaranteed by the Award: the success was witnessed by the second place in the category "General Large-sized local government organizations" of the Good Governance Awards 2018. The PAO was outstanding in transparency and lawabidingness. They followed two important principles, namely the rule of law and moral principles, that is, the works of the PAO adhered to the government regulations through strict orders from the Chief executive of PAO. In terms of public participation, network cooperation, and decentralization for communities to manage themselves, The PAO had a number of government organizations and local authorities in the province participating in local development plan meeting amounted 90.48% and a number of people participated in the local council meeting amounted 100% per the number of meetings. For professional management and Cost - effectiveness of Economy, the PAO showed their performance in good financial and fiscal disciplines. They managed to collect a cumulative amount of taxes more than 50% per annual expenditure in 2017. They has been improved their ability in tax collection by developing new service fees / incomes in 2017. Finally, the survey of people's satisfaction to the service delivery was at a good level. (Nuamcharoen & Sattakorn, 2019)

From the successful performance of the Phrae Provincial Service Organization can explain the key factors of management success as follows:

(1) Leadership

The role of Chief Executive of the Phrae Provincial Administrative Organization was a factor that affected the success of the PAO. He both emphasized transparency for operators to abide with, and created networks that came from good relations between the executives and external networks. The excerpt from the group interview mentioned the key success factor in this aspect as follow:

"Public participation was resulted from the leader. Due to his generosity, he is always kind and helpful to people. That makes the residents feel close to the leader, so that people are willing to engage in the activities of the PAO. His characteristics facilitate the friendship. People can approach him without any discomfort"

Moreover, the people's satisfaction in the performance of the PAO in terms of readiness, reduced procedures, services that derived from the leader's vision were at the high level. In other words, Efficiency and effectiveness in public service delivery could create a lot of faith for the public that gave impact on an effective coordination among many parties. Leadership in the case study demonstrated its attributes in the ability in communication and decision making. The leaders prioritized to decisions making with officers both in top-down and bottom-up operations. The decision was based on the leaders' experiences but in the legal frameworks. Furthermore, they listened to the opinions of expertized practitioners and take them into accounts as data in decision making. In terms of ability to communicate, the two-way communication emphasized the attributes influencing on the better relationship with the officers. As a result, the operators can express their full opinions. It led to a variety of clear and accurate development approaches.

(2) Promoting transparency. The PAO was honored by the Office of the National Anti-Corruption Commission (NCC) as a role model of local government organizations in the prevention of corruption in Phase 2 (fiscal year B.E. 2017-2019). Due to the incident, the PAO has established an action plan and expanded the anti-corruption network to private government agencies, sectors. educational institutions, including local government organizations in Phrae province. From the aforementioned successful operation, the success was derived from promoting transparency. The issue was conveyed through corporate communications; as well as, in several meetings to clarify any doubts or problems arising from works. The weekly and monthly meetings were scheduled. The excerpt from the group interview supported the statement as follow:

"We make decisions together. We have a meeting every Wednesday afternoon. We, ourselves, are the center of the implementation. Anyhow, in case the Chief executive of PAO has any questions regards the operation, he will convene at his office and also have a monthly meeting."

From the above excerpt, it demonstrated a transparent operation, which did not centralize decision-making to the executives, but rather delegated decision-making to operators, including the disclosure of information. Moreover, transparency was highlighted in staff promotion. With the distribution of power to those involved in the operation without intervention, it resulted in how the officers were treated fair. As a result, it emphasized the importance of transparency in every procedures. This was witnessed by an excerpt from group interview:

"Moral matters staff promotion. The power is decentralized to the director of the divisions or director of sections without the intervention by the Chief executive of PAO. Regarding the Procurement, he authorizes to the responsible. It is done in a manner of decentralization"

(3) Values and Organization Culture. The PAO cultivated good core values and organization culture for all executive members and officers. First of all, **Positive Relationships in the Workplace** showed its significance in this aspect. The PAO promoted an organizational culture where the personnel mutually assisted one another and worked in the form of consultations. The relationship model had a positive effect on the local government organization. It was found that personnel of the Phrae Provincial Administrative Organization worked for a long period of time for the PAO. They did not like to migrate out, or to change jobs. The officers worked for the PAO until the retirement. It emerged in continuous work and coordination. There were few gap from lack of personnel on duties. As the data from the group interview showed:

"Working in a friendly environment as a family make us be able to discuss and consult one another. In several times when things get difficult because of some limitations on regulations, we can help one another find solutions by consultation, even sometimes we consider that there should be a regulation amendment"

The second value is **Professionality.** The PAO encouraged public officers to specialize in their assigned tasks and developed their skills regularly. To increase work efficiency and reduce errors for the sake of professionality, the PAO underwent various processes such as training, job coaching from various experts etc. The third one is the **rule of law and Morality.** Public officials and all employees adhered to the regulations. Additionally, they pointed a way to maximize benefits for the community. In Moral principles, the PAO boosted the organization culture to build personnel attributes to be honest, sincere, diligent, patient, and disciplined. In addition, they were shaped up to conduct their profession in good faith.

All in all, the Phrae Provincial Administrative Organization followed the "good governance" which promoted management success. Moreover, when considering all factors that affected the success, there was a linkage among them. In other words, leadership of executives had a great impact on the development of values and organizational culture. The policy of executives was an important part in creating the organizational culture affecting the relationships of the officers. When considering the factors that affected the success of implementing Good Governance of the Phrae Provincial Administrative Organization, leadership was an important factor and influenced the Promoting transparency factor and the Values and Organization Culture factor. It was because leaders are important as the policy makers of the agency, which directly corresponds to the work culture, and creates a good working culture. They have influences on one another.

(4) The availability of administrative resources. The PAO is a large local government organization; therefore, there is a high potential in acquiring and collecting resources. They have an advantage in the resources; that is, machineries and devices to generate many services, including a large amount of budgets. The availability of these resources gives an impact on the capacity to produce more efficient works. Especially in the case of urgent problems, they are prompt to carry out the problems and give a solution with their own equipment. For example, In the case of Phrae Province, it was found that the areas encountered many urgent problems such as drought and flood, but they were able to solve the problem effectively and instantly. This was due to the availability of resources: backhoes, fire trucks, etc., that covered and supported the solutions to various problems in the area, so there was no need to wait or hold on to response to the urgencies. It was witnessed by an excerpt from group interview:

"There are a lot of urgent problems in our area. The Chief executive of PAO will give an immediate order. We have the resources available to solve problems quickly and effective"

During the great flood in 2012, the PAO had received a budget to buy machineries to solve the drought beforehand. Those machineries became an important tools in solving flood problems for people. Therefore, resources and budgets were an important subject that affected the success of management in the area. The availability of resources to address local problems is related to the budget allocation of the local governments, which are varied due to the different sizes and authorities. The PAO is considered a large local administrative organization; therefore, the capital accumulation according to the authorities by means of the equipment and machineries accumulation is sufficient for the works. Additionally, the tools can be shared with their networks in troubleshooting in other areas. A proper

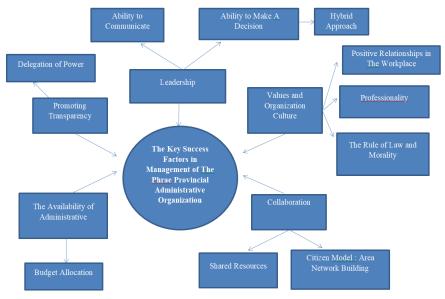
allocation of budgets for each area is an important factor for efficient public service delivery.

(5) Collaboration in the area. The operation of the PAO focused on the decentralization concept. The procedures prevented the top-down intervention; in addition, they were based on the work with the local and other public agencies in the area that included both private and public organizations. As a result, the factors that contributed to the success of the PAO in complying with the Good Governance, were the collaboration with all parties in the area, networking, and sharing tools and machineries with other organizations. The share of management resources made operations faster and more effective. The statement was witnessed by the excerpt from the group discussion:

"In Phrae province, there is an association of local administrative organizations, which has more than 80 members. The network helps members collaborate and help one another. For example, in affected areas from natural disasters, there is a mutual project in relieving people, the PAO, Municipalities, sub-district administrative organization work together by sharing machineries. The PAO lends the machineries to small local administrative organizations without any charges. They need to pay only for the gas to work on the equipment."

Building collaboration to work in the area was a result of working with the citizen model where the concept was focused on the way government have to fit in citizens' lives. (Kowalkiewicz & Dootson 2019). The People-centric method enhance network-building. This model made it possible to have various parties involved and to work together in the area. As a result, there was an effective exchange of resources.

In conclusion, the operation in the province with the collaboration with the other local administrative organizations, other private and public agencies, facilitated sharing in management resources that contributed to the better and more effective services, especially in the urgent cases. From the mentioned data, we can conclude the key success factors as displayed in the model no. 1 below:



Model 1. The key success factors in implementing Good Governance in management of the Phrae provincial Administrative Organization.

Problems and Developmental guidelines for the Phrae Provincial Administrative Organization.

Although the PAO had succeeded in adopting Good Governance in management and produce effective and efficient services witnessed by the award, they encountered inevitable obstacles in management as follow:

1) The scope of authority. The problem was caused by the legislation regarding local administrative organizations regulations. Some were not clear. The problems caused a delay or a termination of the implementation. Some projects were hindered and the local development was possibly discontinuous. For example, in the educational development plan in Phrae province, the PAO initiated the establishment of a Phrae Sport School under the supervision of Provincial Administrative Organization. When the Office of the Auditor General of Thailand inspected disbursement, some parts of it cannot be disbursed because it was not within their authority. This is due to misunderstandings or unclear obligations. It obstructed developments to be at its highest potential.

2) The limit in regulations regarding the management of the PAO. The implementation of various projects under the supervision of the PAO encountered conflicts with the law; that is, Regulation of the Ministry of Interior, Article 67, regarding payment, which is not detailed in the disbursement of funds in various activities. This limited the development of new projects and cut off some process of initiation. As a result, local administrative organizations could not create as many innovations as they should. Identifying the authority of the local government and the legal limitations were important parts of the obstacles that affected the development of the projects. They were structural problems that the local administrative organizations did not have the power to handle with.

Thus, the paper suggested developmental guidelines in management of the PAO that can be divided into three explications; that is:

(1) Strengthening core value and organization culture. In other words, the PAO should keep on the manners that the personnel of the PAO have been undergone. Additionally, they should maintain the strong will to continue the good governance. The norms that they usually conduct are equality and equity. For example, the budget allocation for development is yearly regular plan. It is based on the concept " Cost-Effective of Economy. Furthermore, the PAO is likely to draw more public participation to their administration such as inspection tasks. Moreover, the PAO distributes the power to the people in some scopes of tasks to co-produce. That leads more transparency in the management. Therefore, the people can feel more possessive to their communities and responsible for their societies. The PAO supports knowledge and know-how in many kinds in order that the people can depend on oneself. The practice helps them to reduce the workload. All the mentioned practices are the solutions to build a better organization culture. This was rooted from the good will of the leader following with the correspond policies. The officers can follow and transfer knowledge among them. This was witnessed by the group interview data:

"The policy of the Chief executive of PAO. It is an important factor, which results in the highest transparency. If he corrupted, then all would follow him. However, the Chief executive of PAO always emphasize transparency. And, we don't face any transparency issues"

(2) Development with readiness to transform. The Phrae Provincial Administrative Organization has guidelines for human resource development and information technology development. As for the personnel, the PAO has increased techniques in human resource management, such as creating clarity in the work plan and creating work calendars to increase work efficiency. This includes personnel skills development in the organization. In addition, the PAO has guidelines for the development of information technology to help management operation. The development, therefore, is very important to be continuously implemented and timely. In the case of PAO, they now focus on human resource development by using technology that helps work to be more efficient.

(3) Decentralization to local government organizations for good management. The main problems affecting management are problems in the scope of authority, which, is related to the laws in accordance with administrative power of the bureaucratic system. It results in the ability of the PAO and gives them work limitations in various fields. For example, in the areas with overlapping powers with other government agencies, there are problems in budget use. Additionally, the budget allocation does not correspond to actual practice. To solve these problems, the power distribution to the local administrative organizations will be an important factor in solving structural problems, law and scope of authority that lead the work of local administrative organizations to the fullest potential.

Conclusions and Discussions

The result showed that the key success factors of the management of the PAO were Leadership, Promoting transparency, Values and Organization Culture, the Availability of administrative resources and Collaboration in the area. To discuss the reasons why they succeeded in implement the Good governance in the management of the Phrae province, we can scrutinize each factor respectively. The Leadership contributed to the success; in addition, it is a major linkage to other key success factors. Leadership was a cause of the well-behaved organization culture because leaders form a good role model to others. Moreover, the leaders were major policy-makers. According to Chandarasorn (2011), it corresponds to "Organization Development Model", where the leadership is one of the most important factors in the implementation process. Moreover, the model shows how the leadership connect to team-working and motivation building. The leadership gains trust from the citizens and the citizens are prone to trust in public officers, politicians and public organization when Good governance is executed (Cheema, 2010). It can concluded that trust is considered as both precondition for and a result of good governance (Popovski 2010); in the same way, trust is a result of leadership. The communication of leaders' intention and vision regarding to transparency and decentralization once were communicated to the officers, the communication can pave the way to cultivate a positive organizational culture. In terms of Promoting transparency, PAO promoted transparency by proactively working and has emphasized on creating operational plans for transparency. This included creating clarity and correcting working conditions by participation through

weekly meetings to ask questions and solve problems. The practices of transparency are important in local government because citizens' positive and negative opinions toward their government are influenced from the information conveyed by the government to them. (Beshi & Kaur, (2020).

In terms of Values and Organization Culture, the factor was considered as an important factor in management and building a work culture of the organization. Additionally, leadership is a linking factor to others. In local government, leaders are a significant factor to build up a good organization culture. Furthermore, the case study showed that the leader's decision to the distribution of power to the officers without leader's intervention create an open culture stimulates participation. Additionally, that the decentralization of the PAO corresponds to the B. Guy Peters' model regarding the Good Governance (Siriprakob, 2016). The model named "participation model" reflects the problems of management; that is, Hierarchy and Top-Down management. They hinder operators' participation. The open working culture by the leaders' intention in accordance with the decentralization improves more participation in management.

For the availability of administrative resources, it was due to the fact that the PAO is a large local administrative organization. Thus, there was the availability of resources, both tools and budgets. The factor corresponds to the principle of local governance where the needs of local people and communities are main focus (Sriram, 2013). The study found that the availability of these resources was an important part in providing efficient public services. When considering the case study of PAO, the result demonstrated that urgent problems were resolved quickly and efficiently. According to the study of Llera (2020), the budget and the general account need to be set the priority agenda, including its political, technical and academics aspects. The political aspect refers to elements of planning, management and accountability, etc., Secondly, the technical aspect means the reinforcement of internal control bodies and external agency. Finally academic is, for example, empirical studies on budgetary institution. It is due to the resources are linked to the accountability and transparency that are the pillars of Good governance. The prove showing that how much the local government is transparent and disclose the information regarding the presence of their resources make them more legitimate to exploit the administrative resources. It influences on the quality and effectiveness of the services they deliver. Moreover, financial autonomy can support agencies to provide more customized services to citizens. Additionally it stimulates citizen engagement because they can allocate financial resources according to citizens' preferences and needs (Song et al, 2020).

Finally, **collaboration in the area** was the concept of which the focus is based on the distribution of power to the operators who implement the projects and administrative practices without the intervention from the top or relevant organizations. The synergy between bureaucracy and politics is crucial to the realization of good governance system. Authority/ power, human resources, and recruitment system influence the relationship (Bestuur, 2020). The synergy have a positive influences on the area networks and partnership that form a collaboration to produce public service (Ishak et al, 2020). Moreover, it was to share resources to enhance the collaboration among many parties, especially among other local administrative organizations and other public/private agencies. Finally, the collaboration in the area underlined the success of the PAO. They had a working process that focused on decentralization to the responsible. The concept reduced the top-down intervention. Additionally, it stimulated creating cooperation and sharing resources to work together with other local government organizations and other agencies, both the public and private sectors.

The Phrae provincial administrative organization has encountered administrative problems such as clarity of authority and duties, which is a structural problem of the Thai bureaucratic system that causes some lack of administrative authority. It resulted in the public service being unable to reach its full potential. In addition, the problem of legal limitations related to administration, which is also a structural problem, was a major obstacle. In particular, the laws related to the use of budgets were barriers to initiating new projects for people in the area. Charoenmuang (2010) discusses about the essence of local government that local people are independent in making decisions and managing their own localities; as well as, in determining budgets for local administration expenditures for each project. That is a financial autonomy. However, the common problems in public administration result from a lack of new public management. Public sector require specialized agencies with lean flat and autonomous characteristics (Katesuwan, 2013). In the same way, the PAO faced the structural problems that prevented work processes from being able to achieve their full potential. Good Governance development guidelines included strengthening values and organizational culture by maintaining a pattern of work and norm in the workplace; as well as, creating a good work process, both for the executives and the operators. Moreover, the guidelines suggested a development that the PAO should prepare for the changes and challenge. Finally, it was suggested that there should have an amendment in structural problems for the local administrative organizations to be able to work at full potential.

The guidelines for the development of good management of PAO is to delegate authority and duties to the responsible and other smaller local administrative organizations (LAOs) to be able to provide and co-produce efficient public services. Greater clarity, thus, is required in the internal rules and procedures that allow to comply more effectively with legal requirements (Llera, 2020). Although the image of the LAOs is often attacked by corruptions, it may be overlooked by the participation. LAOs are considered an organization that is close to the people. Promoting public participation in local administration is, therefore, an important part of their area development. At the same time, public participation also plays an important role in local development. Decentralization to the locals and the responsible people is, hence, a true path of development management. According to Denhardt, B. R. & Denhardt, V. J. (2011), New Public Service (NPS) focuses on public interest. Public agencies, therefore, need to find ways to create mutual benefits and shared responsibility among the people. One way is to allow people to come together and think together through discourses. As a result, the

government agencies will ensure that the guidelines that came from public discussion, are aimed at the public interest. The process will give citizens the duty to inspect LAOs, which the study considers to be a better management.

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