Practical Challenges in Comparing Chinese and American Local Government*

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Parts of China are an advanced industrial society with excellent public transportation, universities, industry, and other modern features; while other parts (geographically and functionally) remain a developing nation. For China, to build a stronger and more equitable society requires much work to develop governance at the local level. In pursuit of this goal, China actively seeks to learn lessons from abroad, including from American local government. This article examines the similarities and differences between these two nations and their systems of government toward the end of identifying potential challenges to China’s efforts to learn from American-style local governance. This is grounded in policy transfer theory, which guides the discussion of how to learn from other jurisdictions—from other jurisdictions within the nation, from other points in time within the nation, and from other nations. Perhaps the ultimate questions are, “Should China continue efforts to learn from external models or focus its energy internally?” and “Does China need a more clearly defined governance model rather than its current approach that simultaneously allows and questions a high degree of decentralization (both within the party and the government)?” This paper seeks to add to that intellectual discourse by applying recent data and a conceptual framework.

Keywords: policy transfer, Chinese local government, comparative institutions

Introduction

Parts of China are an advanced industrial society with excellent public transportation, universities, industry, and other modern features; while other parts (geographically and functionally) remain a developing nation. For China to build a stronger and more equitable society requires much work to develop governance at the local level. In pursuit of this goal, China frequently seeks to learn lessons from abroad, including from American local government. This paper examines the similarities and differences between these two nations and their systems of government toward the end of identifying potential challenges to China’s efforts to learn

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from American-style local governance. Issues explored include the difference in scale (size of cities, number of units of local government), the nature of decentralization (federalism versus a decentralized unitary system), the different role of politics within the two systems, public sector values (competition, transparency, access, etc.), and so forth. The goal is to provide comparable, recent information on these practical issues so that the conceptual discussion is rich with useful information that can lead to a meaningful discussion of the challenges to learning from the US model.

At a theoretical level this analysis is grounded in policy transfer theory, which can conceivably guide any discussion of how to learn from other jurisdictions—from other jurisdictions within the nation, from other points in time within the nation, and particularly from other nations. Perhaps the ultimate questions are, “Should China continue efforts to learn from external models or focus its energy internally?” and “Does China need a more clearly defined federal model rather than its current approach that simultaneously allows and questions a high degree of decentralization”? This paper seeks to add to that intellectual discourse by applying recent data and a clear conceptual framework. In addition, coauthors are from China and the US and thus seek to consider this from multiple perspectives, rather than judging one system as right or wrong, good or bad. Continuous improvement should be the goal rather than normative judgments.

The flow is to first provide background on policy transfer theory, and then to discuss a number of significant differences that must be considered as China seeks to learn from American local government. Finally, the conclusion provides some suggestions for when and where it might be most appropriate to look at the US, if a Chinese local government indeed hopes to improve its governance by learning from the American model. We should note at the onset that much like Woodrow Wilson (1887) argued in his seminal essay The Study of Administration that America could learn from Europe’s experiences without adopting their systems of government, China might also learn from the American system without any need to adopt the American constitutional structure or political system.

**Policy Transfer Research**

Cross-national research to improve national government is an idea that goes back centuries including Wilson’s 1887 essay as just mentioned. However, policy transfer is attracting increasing attention from governments, international NGOs, and scholars due to globalization. Researchers across international studies, political science, and public administration have been aware of the potential positive effects of foreign ideas and experiences for a long time while governments increasingly view policy transfer and global learning as a useful tool. Little research has focused on the potential negative effects of such learning.

Policy transfer is a generic concept that refers to the process in which knowledge about institutions, policies, ideas or delivery systems in one sector or level of governance is used in the development of institutions, policies, ideas or delivery systems at another sector or level of governance (Evans, 2004). Policy transfer can be categorized into two types: (1) transfers from one geographic region to another; and (2) transfers across time (i.e., learning from the past). This paper is focused on the first type, and so we do not discuss the extent that China can or should learn from its own very rich administrative history.¹

Contemporary policy transfer analysis originates from policy diffusion studies, a subset of the comparative politics literature. Policy transfer analysis often encompasses four aspects, including explanation (why policy

¹ Much of this discussion of policy transfer theory comes from the lead author’s prior work with Hu Di at the University of Limerick, though none of our errors should be attributed to her influence (Hu & Mingus, 2012).
transfer happens), description (the way the policy transfer happens), prescription (asking how and when policy transfer should happen), and methodology (the nuts and bolts of implementation). All four aspects can be examined at three different levels: the macro level (how economic context, globalization, and international relationships affect the process), the meso level (policy transfer frameworks and networks, and domestic elements), and the micro level (stages of the transfer process such as policy formulation, implementation, and evaluation). Evans and Davies (1999) argued for four levels as they seek to include “the competition state” in their analysis (p. 381). However, it is not always clear in their analysis why this is included as it is frequently left out of their analysis. They use slightly different terminology, yet are essentially describing the same concepts except for seeking to separate the competition state.

Among all the approaches of analyzing policy transfer, the multi-level approach introduced by Dolowitz and Marsh (1996, 2000) is widely accepted because their heterogeneous concept of policy transfer encompassed the policy learning, policy diffusion, lesson drawing and policy convergence literatures. The Dolowitz and Marsh (2000, p. 8) framework (DMF) is organized around six key questions (i.e., dimensions): (1) From where are the lessons drawn? (2) Why do actors engage in policy transfer? (3) Who are the key actors in the policy transfer process? (4) What is transferred? (5) What are the different degrees of transfer? and (6) What restricts or facilitates the policy transfer process?

The heterogeneous characteristic of their approach has drawn some criticism precisely because it allows others to claim that policy transfer theory is not unique. For example, Oliver James and Martin Lodge (2003) provided an extensive argument that the lesson drawing research by Richard Rose (1991) and the policy transfer research by Dolowitz and Marsh is indistinct from conventional accounts of rational policy making. Essentially James and Lodge argued that rational policy making always has a starting point, and thus was inherently learning from some approach used at some other point in time or at some other location. This logic, however, would appear to overlook what are arguably the most common approaches governments actually use to make policy and program decisions, specifically Charles Lindblom’s incrementalism (1980) and Amitai Etzioni’s mixed scanning (1986). Howlett and Migone (2011) explained that incrementalism is still the underlying process within punctuated equilibrium theory, which essentially seeks to explain when and how policy change is likely to be non incremental.

David Benson and Andrew Jordan (2011) had recently demonstrated that policy transfer research has “come of age” in the sense that it has moved from its narrow origins based on one national government learning from another national government, to a broad spectrum of research assimilated into the literature on globalization and policy innovation. They also make the case that it is used by a broad spectrum of actors including national governments, subnational governments, think tanks, international NGOs, and so forth.

As such, the idea of examining transfers as a distinct approach to policy making has extensive merit, especially now that nations routinely send delegations of officials to other nations specifically to learn about one institutional structure (e.g., voting processes, parliamentary functioning, decentralization) or one specific policy delivery approach (e.g., mass transit, refuse collection, emergency management). Within the United States it is even common for one local government or one state government to send a similar delegation to learn from the “best practices” in other cities, states, or even nations. Policy transfer can thus be a deliberate process at the subnational level. In essence, policy transfer analysis provides an approach to consider how one organization learns from another organization.
Dolowitz and Marsh Framework (DMF)

The DMF offers enhanced understanding of similarities and differences between countries/institutions that involve the transfer process and “in assessing their importance for policy transfer” because it is a “systematic and analytic approach” to learn the policy transfer process (Wolman, 1992). Based on the learning and adoption process, research may be confined to the six elements from the original DMF along with the process (Common, 2001), since the model focuses more on the dynamic adoption processes that led to a specific discernible policy transfers (Dolowitz & Marsh, 1996). Each dimension is explained in turn.

From Where are the Lessons Drawn?

Policies can be transferred from three levels of governance: the international, the national, and the local (i.e., sub-national) (Dolowitz & Marsh, 2000). The “near at hand” concept suggests that “within country” transfers would be the first choice. This allows one to look at other units of government within one’s country. This may also involve looking at one’s past in order to avoid repeating the same mistakes. Rose (1991) suggested that additional obstacles to learning exist when time differences enter the transfer process because, for example, subjective evaluation is likely to be involved when looking at one’s own past. However, this paper takes the “from where?” as a given by focusing narrowly on challenges as China now attempts to learn from US local government.

Why do Actors Engage in Policy Transfer?

Policy transfer occurs on a continuum from perfectly rational lesson drawing (i.e. voluntary transfer) to the direct imposition by an outside force (i.e. coercive transfer). The continuum Dolowitz and Marsh built is from the perception of the recipient or the learner. Few cases reside at either extreme endpoint on this continuum when talking about policy transfer because policy is seldom, if ever, perfectly rational, and because the very word “nation” implies the existence of a moderate degree of autonomy.

Voluntary transfer happens when the current policy or program is perceived as functioning poorly or creates public dissatisfaction. Changes in governance or policies/programs may be sought to change such perceptions. Direct coercive transfer happens when a policy or program is forced to be introduced against the desires of a government. This was widespread in the age of imperialism (i.e., colonialism), and such colonial powers are still in place in parts of the world. In federal systems this may be referred to as “intrusive policies” and/or “unfunded mandates” from the national government to subnational units of government.

In most common cases, policy transfers are made with limited information and/or limited analytical power rather than perfect rationality. The limited rationality when transferring policies is due to the actors’ subjective views about the essence of policies; the actors limited knowledge of available policy options throughout the world; the way policies are utilized in export countries; and/or a misunderstanding of the social, cultural, or political differences between the countries. Besides the incompleteness of knowledge about the policy and its context, difficulties for making perfectly rational policy decisions are the “difficulty of anticipating or predicting what will occur in the future… and the inadequate scope of alternative behaviors that are considered or analyzed” (Mingus, 2007, p. 65).

More coercion exists in the motivations for a policy transfer the farther one moves toward direct coercion. The voluntary though driven by perceived necessary category with more coercive forces is common in Chinese policy transfer history. In contrast, moving towards the coercive end, “obligated transfer” best describes what occurs as nations are part of international or supra-governmental organizations, which frequently seek to have
all participating nations adopt specific policies and programs. For example, when China joined in the World Trade Organization (WTO) in 2001, the membership status brought great opportunity for Chinese economic development as well as commitments to the WTO such as reductions in non-tariff barriers. These are negotiated obligations rather than direct coercion because China made the choice as a sovereign nation to join the WTO.

Another motivation for negotiated transfer is the fear that a nation will fall behind its neighbors or competitors. China likely had such a fear in the 1980s as it chose to pursue economic policies similar to the Four Asian Tigers. Different reasons for a policy transfer may lead to “different degrees of transfer” precisely because how much the recipient decides to adopt may depend on the reason for such policy adoption.

**What are the Different Degrees of Transfer?**

The DMF develops the idea of degrees of policy transfer from Rose’s lesson-drawing publications, in order to denote the ability to make partial transfers and to mix-and-match ideas from more than just two countries. As they state, “Policy transfer is not an all-or-nothing process” (Dolowitz & Marsh, 2000). There are four degrees of transfer in their model: copying, emulation, hybridization and synthesis, and drawing inspiration. It is safe to assume China has moved beyond mere copying as it is now the world’s second largest economy. As China has clearly “come of age” the hybrid and synthesis degree makes the most sense. China, on the one hand, has little need to copy as this implies that it does not already have a well-developed system; while, on the other hand, it is unlikely to draw inspiration from an entirely different political system. Thus in terms of learning from American local government it seems likely China would seek to learn what is happening in the US and then to modify their own structures, policies, and/or programs to incorporate what they see as relevant parts of the foreign model.

**What is Transferred?**

The DMF (2000) lists things that can be transferred, including policy goals, policy contents, policy instruments, programs, institutions, ideas and concepts, ideology, and even negative lessons. Essentially, anything can be transferred from one society or culture to another, from one system of governance to another, including an entire political system or way of governing. Dolowitz and Marsh do not argue that such large-scale transfer is routine, but they do argue that multiplicity is one characteristic of many transfers, which means transfers may including both policies (goals, content, and instruments) and programs (policy tools, institutions and structures).

**Who are the Key Actors in the Policy Transfer Process?**

The original DMF presented nine categories of actors in their work, including elected officials, political parties, pressure groups, civil servants, policy experts, supra-national governmental and non-governmental institutions, transnational corporations, think tanks and consultants. For the present paper, the main actors are public managers and politicians at the local and national level, and thus the extent that adopting policies or programs is driven by the local verses national levels, and by civil servants verses political officials, might both be relevant. In addition, China makes wide use of panels of academic experts in many fields of national policy making and so traditional Chinese academics with an awareness of US local government might also be influential actors.

**What Restricts or Facilitates the Policy Transfer Process?**

This sixth and final question in the DMF is the main focus of the present paper, though it is clearly
interconnected with the other five questions in ways that are suggested above. Both Rose (1991) and Dolowitz and Marsh (1996) discussed factors that may constrain policy transfer. Their suggestions include the number of policy or program goals, the complexity of the problem, the relationship between the problem and the solution, perceived side effects, the information the recipient has (or does not have) about the policy or program, and the predicted outcomes. These may each be potential barriers around the transferred policy or program before a transfer actually happens.

Based on these factors, it seems likely that there are two categories of barriers or obstacles: endogenous and exogenous. Exogenous factors refer to the uniqueness of a policy or program to the original country (Rose, 1993). Dolowitz (2003) included this by reference to the wider social and policy context as potentially making policy transfer more difficult. Endogenous factors are concerns about the recipient country, and might include policy history (past preferences and experiences may constrain future inclinations for policy transfer), institutional and structural factors (size and efficiency of bureaucracy, integration of political factors within public management), ideology and cultural background (more incompatibility here would suggest less transferability of policies), and resources the recipient country possesses (human, economic, and technological).

**Discussion of Potential Barriers**

**Different Governing Structures: US Has Both National and Federal Structures**

James Madison (1788) claimed that “each State, in ratifying the Constitution, is considered as a sovereign body, independent of all others, and only to be bound by its own voluntary act”. This statement clarified the federal structure at the birth of the new nation and is in keeping with the language of the US Constitution. However, national powers have grown immensely as the US Congress was authorized to enact all laws “necessary and proper” to carry out its responsibilities. The basis for many national social welfare programs is “Congress shall have power to… provide for the… general Welfare of the United States” (US Constitution, Article I, Section 8, 1787).

The reality of these general ideas moved forward greatly due to two things: the 16th Amendment and the spending power doctrine. The 16th Amendment allowed for an expansion of taxation by the US Government, which then introduced a national income tax. This became the major source of revenue that allowed for massive growth in the size and scope of the national government. The spending power doctrine was created as Supreme Court decisions determined that Congress could act outside its Constitutional jurisdiction by offering money to state and local governments to pursue nationally defined policies. State and local governments must voluntarily accept such national grants, but it is difficult to say “no” when “yes” comes with federal money. This means the national structure is when national agencies and departments are decentralized to operate throughout the country while the federal structure is the separation of powers between the US Government and the 50 state governments.

In Contrast, China has one national government with many levels or administrative divisions, but no sovereign sub-national governments. All power within the national government of China is held within several branches: the National People’s Congress (the legislative branch), the State Council (the executive branch), the Supreme People’s Court and the Supreme People’s Procuratorate (the judicial branch), and the People’s Liberation Army (PLA) via the Central Military Commission (the military branch).
Different Governing Structures: “Local Government” in China Must be “State and Local Government” in the US

“Local government” in China usually refers to all governments that are not the national government, such as provinces, semiautonomous regions, cities, counties, and so forth. Therefore, as a unitary system China has the national government and an increasingly important local government that includes the provinces. Unlike the US, some large cities are treated as provinces within the Chinese system. The national government defines and controls the local government, including appointing mayors of large cities, changing provincial boundaries from time to time, appointing provincial governors, and so forth.

In the US the states are separate governments. America truly has 51 governments rather than one government. The impact is that local governments such as cities and counties are defined in state constitutions rather than in the US Constitution or in national law. Thus to learn from American local government, one must understand the system in the specific state that is being studied. Generalizing across all 50 states is not accurate.

In order to make comparisons convenient, “subnational” is a term that can be used in both nations to include all governments lower than the central government. In the US, state and local governments have no subordinate relationship with national government. State governments are largely self-governed and each State determines the degree of autonomy enjoyed by local units of government such as townships, villages, cities, and counties.

Table 1

<table>
<thead>
<tr>
<th>Level</th>
<th>Name of level</th>
<th>Type of subnational government</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Provincial level (33)</td>
<td>Provinces (shěng) (22)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Claimed province (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Autonomous regions (zìzhìqū) (5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Municipalities (zhíxiǎshì) (4)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Special administrative regions (tèbié xíngzhèngqū) (2)</td>
</tr>
<tr>
<td>2</td>
<td>Prefectural level (333)</td>
<td>Prefecture-level cities (dijìshì) (286)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Also, unspecified number of Prefectures (diqū), Autonomous</td>
</tr>
<tr>
<td></td>
<td></td>
<td>prefectures (zìzhìzhōu), and Leagues (ménɡ)</td>
</tr>
<tr>
<td>3</td>
<td>County level (2,853)</td>
<td>Counties (xiàn) (1,442)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Districts (shìxiáqū) (872)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>County-level cities (xiānjìshì) (368)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Autonomous counties (zìzhìxiàn) (117)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Also, unspecified number of Special district (tèqū), Forestry district (línqū), Banners (qì), &amp; Autonomous banners (zìzhìqì)</td>
</tr>
<tr>
<td>4</td>
<td>Township level (40,497)</td>
<td>Townships (xiāng) (12,812)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Street Communities (jiēdàobānshìchù) (7,282)</td>
</tr>
</tbody>
</table>


Chinese local government, generally speaking, includes four layers. According to Dai (2011), Chinese local government always has a subordinate relationship with the central government. Decision-making by subnational governments is confined by central government policy in both procedure and content. As shown in Table 1, the relevant laws on divisions of administrative areas stipulate that (1) the whole country is divided into provinces, autonomous regions, and municipalities directly under the Central Government; (2) provinces and autonomous regions are further divided into autonomous prefectures, counties, autonomous counties, and cities; (3) autonomous prefectures are further divided into counties, autonomous counties, and cities; (4)
counties and autonomous counties are further divided into townships, ethnic townships, and towns; (5) municipalities directly under the Central Government and large cities are divided into districts and counties; and (6) the State shall, when necessary, establish special administrative regions.

**Different Governing Structures—Decentralized Governing Structures**

The decentralized structure of national government agencies and departments are the same throughout the US, but the extent of decentralization varies by agency. “Regional” versus “state and local” usually helps to differentiate decentralization of the central government from the idea of federalism. US agencies and departments operate within 10 Standard Federal Regions as displayed in Figure 1. These are for managing the decentralization of national agencies and departments. They say nothing about how US state and local governments function, except that state civil servants are often in close contact with their counterparts in federal agencies from the appropriate region.

This decentralized aspect of national departments and agencies is not considered to be state and local government, and it is truly not part of the federal model. Any unitary system may have a highly centralized or highly decentralized structure. China, however, has a centralized, unified civil service system. In the US, national agencies are fairly centralized but state governments have much autonomy in managing their own affairs. Local government autonomy depends heavily on state laws and state constitutions.

![Figure 1. Ten US Standard Federal Regions.](image)

The closest thing today’s China has to the 10 Standard Federal Regions is its economic development zones. China used to divide the mainland into three development regions from the East coast to the Western frontier; however, the 11th five-year guideline no longer uses this East-Center-West division (though it is still frequently referred to in government reports and academic literature). The five-year plans of China are a series of social and economic development initiatives and the 11th one moved from three development zones to the current eight Comprehensive Economic Zones as displayed in Figure 2.

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2 “Regional” is also used when states cooperate on key issues, which may even lead to a formal interstate compact. An interstate compact must be approved by the central government, and approved separately by each involved state government.
Central agencies and departments are divided into provincial-level offices rather than regional offices based on these eight zones, with a heavier presence of such national offices within larger municipalities. The zones, instead, are used so that smaller regions have specific economic developing strategies based on their own natural and human environment. For example, the northeast region is a base for heavy industry and also for many agricultural products.

![Figure 2. Chinese economic management zones.](image)

**States and Local Governments as Incubators**

States and large cities have long been viewed as the laboratories of democracy. US states and urban centers are usually where new policy ideas are developed and tested as opposed to the central government testing out new social or educational policy ideas to see if they might be effective. Even when significant change is needed quickly, the national government is unlikely to do much until it appears to have worked elsewhere.

For example, the US government started many new social policies during the Great Depression. The biggest is the social security or “universal pension” system for the elderly. However, this was based directly on widower’s pension programs that had been established in numerous states during the previous 25 years (Skocpol, 1992). So, even in an economic crisis the national government looked for clear evidence that program ideas had worked elsewhere. If a policy or program has not appeared to work in several states or large cities, it is unlikely it will be adopted nationally.

This is not the national government pilot testing programs, it is a system of separate subnational governments developing and implementing their own ideas. Federalism is not strictly hierarchical or linear. Article 1, Section 8 of the US Constitution lists the “enumerated powers” of the Congress and several other parts reserve all other powers to the states and their respective local governments. Reality is that all powers are...
quite mixed in modern American governance. Perhaps the only true exception is that when in an active war the States truly have little say in national defense policy. The interconnectedness of the Marble Cake concept is how most academics view today’s federalism rather than the clarity implied by the Layer Cake concept.

For larger urban centers, this cooperative federalism may also include extensive relationships directly with various federal agencies—yet the federal government does not control them in a hierarchical fashion. Instead, the control largely comes through rules attached to grants and through the direct actions of federal agency offices within those urban areas (such as Housing and Urban Affairs programs in many inner cities).

The extent that China uses successful programs and policies from subnational units of government, to develop nationwide programs and policies, is unclear. However, the central government frequently pilot tests policies and programs in several units of government (i.e., cities, counties, and districts), sometimes over multiple years, before adopting such policies or programs more broadly. In general, however, the central government makes general policy and these policies usually allow for significant variance in subnational implementation.

Table 2

<table>
<thead>
<tr>
<th>Number of US and Chinese Sub-national Units by Type</th>
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<tbody>
<tr>
<td>A. Changing sub-national Units in US (excluding the 50 States)</td>
</tr>
<tr>
<td>Year</td>
</tr>
<tr>
<td>1952</td>
</tr>
<tr>
<td>2002</td>
</tr>
<tr>
<td>2012</td>
</tr>
</tbody>
</table>

Source: US Census Bureau, Census of Governments, Volume 1, Number 1.

B. Changing sub-national Units (i.e., administrative units) in China

| Year | Provincial level | Prefecture level | County level | Township level |
| 1952 | 45 | 192 | 2,256 | 562 |
| 1978 | 32 | 310 | 2,653 | 6,198 |
| 1984 | 32 | 322 | 2,814 | 106,439 |
| 2002 | 34 | 332 | 2,860 | 44,850 |
| 2012 | 34 | 333 | 2,852 | 40,446 |


The Number and Size of Subnational Governments

Table 2 shows that the number of local governments in the US changed significantly from 1952 to 2012. Two trends are obvious: (1) There was widespread consolidation of local school districts (primary and secondary schools), which was driven by state government efforts toward more administrative efficiency. The number of local school districts dropped from over 67,000 to under 13,000; (2) There was extensive growth in special districts (i.e., special purpose units of government verses general-purpose units of government), such as water and sewer districts, hospital districts, transportation districts, and regional Councils of Government. This was driven by the need for inter-local efficiency and cooperation, and was usually driven by the perceived need of local governments to work together rather than by mandates from above. Special districts increased from 12,000 to over 38,000, or they basically tripled in 60 years. General-purpose units of government such as cities, counties, townships, and villages did not change appreciably in numbers, but many ceded some powers to special purpose units that were created.
According to the data from National Bureau of Statistics of China, China currently has 33 provincial-level governments include one claimed province (Taiwan), 333 prefecture-level governments, 2,852 county level governments, and 40,446 towns or townships. Table 2 demonstrates that the number of divisions of administrative areas in China changed significantly from 1952 to 2012. Generally speaking, the divisions at the provincial level, prefectural level, and county level did not change much from 1952 to 2012; however, the number of township-level governments experienced a tremendous increase from 1952 to 1984. The number of township level units started to decrease in 1985 (Ma et al., 1998; National Bureau of Statistics, 2013) as national policy sought consolidation to achieve greater administrative efficiency.

The divisions of administrative areas in China has not changed appreciably in the past decade, suggesting these have “settled in” as the current system developed in the late 1970s and throughout the 1980s. Thus, in 2012 China had 43,665 administrative subdivisions while the US had 90,056. China has four times the American population and roughly half the units of government, and so the average population for an administrative area in China is eight times the size of one in the US.

Table 3

<table>
<thead>
<tr>
<th>Largest American Metropolitan Areas per 2010 US Census</th>
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</thead>
<tbody>
<tr>
<td>Metropolitan Statistical Areas</td>
</tr>
<tr>
<td>New York-Newark-Jersey City</td>
</tr>
<tr>
<td>Los Angeles-Long Beach-Anaheim</td>
</tr>
<tr>
<td>Chicago-Naperville-Elgin</td>
</tr>
<tr>
<td>Dallas-Fort Worth-Arlington</td>
</tr>
<tr>
<td>Houston-Woodlands-Sugar Land</td>
</tr>
<tr>
<td>Philadelphia-Camden-Wilmington</td>
</tr>
<tr>
<td>Miami-Fort Lauderdale-West Palm Beach</td>
</tr>
<tr>
<td>Atlanta-Sandy Springs-Rockville</td>
</tr>
<tr>
<td>Boston-Cambridge-Newton</td>
</tr>
</tbody>
</table>

Similarly, by Chinese standards there are few large cities in the US. Instead, metropolitan areas are conglomerations of many smaller cities and would generally be considered small in China. Table 3 shows the 10 largest US metropolitan statistical areas, which are the only ones with five million or more people. In addition, the actual size of the core cities are quite small with Detroit being less than 1/5th the population of the Detroit metropolitan area, New York City (NYC) being just over 1/3rd of the New York metropolitan area, and Atlanta being 1/10th the population of the Atlanta metropolitan area. Six Chinese cities are larger than New York according to the 2010 data, three Chinese metropolitan areas are as large as the NYC metropolitan area, and over a hundred Chinese cities have more than one million residents compared to just nine American cities.

Thus American cities are fragmented with numerous elected city councils competing with each other for power and control, and maintaining separate systems for numerous functions. The growth in special districts reflects, among other things, attempts to achieve cooperation in these metropolitan regions such as the Regional Transportation Authority in the Denver area or the North Central Texas Council of Governments in the Dallas-Ft Worth area.

In contrast, large Chinese cities like Chengdu and Wuhan have a secretary and mayor who have a large

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3 Combined statistical areas and metropolitan statistical areas are not identical geographical areas.
degree of control over the entire metropolitan area, even though it is broken down into districts and surrounding counties. In four large Chinese cities—Beijing, Chongqing, Shanghai, and Tianjin—urban areas are now municipalities under direct central control (i.e., managed akin to a province). Both models have the possibility to avoid the strong fragmentation in US metropolitan areas without needing to develop numerous special purpose units of government. Another way they might be avoiding the fragmentation is that cities in China run the public schools, including local universities in many cases, as well as the public health and hospital systems. In comparison, Table 2 shows that the US still has nearly 13,000 local school districts. These are separate units of government with their own elected governing bodies.

This leads to a situation where less fragmentation appears to exist because the secretary, mayor and city government control a broader range of public functions as well as a wider geographical area than in American local governments. However, another type of fragmentation may be more evident because the city government, the political party, and a national department each have some control over any given service being provided by the municipal government. In the American model there is not an official role for the political party at this level, but rather they attempt to influence party members who have been elected to the council/commission. In some cases such as public health or highway maintenance the city may share authority with state departments, but it would be unusual for that authority to be shared with a national department.

Finally, it is worth noting that China’s largest province, Guangdong, had roughly 105 million residents in 2010. For comparison, that exceeds the combined population of America’s four largest states (California, Texas, Florida, and New York). In fact, 14 of China’s 22 provinces have populations that exceed the largest US state and so “size” is not just about urban areas.

**Elected Council-Manager Form of Government**

US cities have an elected council or commission (i.e., the politicians). A mayor (i.e., the leader) is either elected by the public or selected by the elected council members. The mayor used to be the administrative leader; however, most cities now have a City Manager hired for skills, education, and experience. This was a tremendous change that started in the early 1900s. Now, a large majority of cities have a hired City Manager as the chief executive rather than an elected mayor. Where there is one, the mayor is usually the chief political spokesperson, but today, the mayor seldom runs the city departments such as finance, personnel, sanitation, roads, public health, and so forth. Instead, a trained public manager is between the council and the civil servants, yet also must be a senior strategic manager and politically astute (Nelson & Svara, 2014).

Most readers will be familiar with the Council-Manager form of local government that is extremely common in the US Rather than an elected or appointed mayor being the chief executive, the mayor and council hire a professional manager and all of government usually falls under his or her control. The council provides policy direction, oversight, and budgetary authority. In many American counties a similar model exists in that an elected county commission hires a County Administrator to active manage all county functions.

In some larger US cities an elected mayor is still the chief executive and directs the department heads, but that is a less common model today. In contrast, in smaller areas the mayor and city council members are usually all volunteers with their principle occupation being outside of the local government. In some larger cities these council members or commissioners are elected to part-time or full-time jobs and can be much more actively involved in the affairs of government. State legislatures and the central government do not have a role in appointing the leaders of these city or county governments, or local school boards, except under certain
emergency financial management laws that vary from state to state.

In China, even though being a member of the party is not required to be a civil servant or sit for the civil servant examination in most cases, people often must be a member of the Communist Party of China to be hired or to get promoted. In Chinese local government and public institutions (such as universities), the governor of a province or the president of a university is deputy secretary of the party, while a party official is the secretary. In addition for the Hong Kong and Macao Special Administrative Regions, there is a trend toward having the executive heads of local governments as a deputy party secretary, who is under a secretary of the Communist Party of China at the same level. Therefore, while these leaders are not elected, they are explicitly political. In contrast, in the Council-Manager model, the education, skills, and experience of a “hired administrator” frequently makes that administrator a valued policy advisor rather than purely an agent of the council or a functionary (Nelson & Svara, 2014).

In addition, local level officials often organize across the state and can be a formidable political force. The dynamics of hundreds of thousands of locally elected politicians must not be overlooked, and are an extension of the Council-Manager model, which tends to push politicians to stay connected to the voters while allowing the managers to manage. These officials have more direct access to voters and thus can urge voters to vote for or against state-level politicians. This local legitimacy can rival the formal power based in the State Constitution. In terms of “intergovernmental management”, the balance of power between state and local governments is a crucial issue. In the US, federalism favored state and local rights; local governments retained considerable autonomy much of the time (Kim & Law, 2010, October 5). However, state-local intergovernmental management may be state-driven, local-driven, or more cooperative.

State legislature representation is decentralized by nature, the costs of centralized coordination are high, state constitutions often place limits on state legislative control over county and other local governments, and “home-rule charters” provide increased autonomy to cities and other local governments and have been supported by the courts (Confederated Tribes & Bands of the Yakima Indian Nation v. Baldrige, 1985). Within many states you have a quasi-federal system in operation, especially in terms of the largest cities due to their political clout. Yet, when serious conflicts exist the state usually has the law on its side even if the cities and counties have the voters on their side.

Applying these issues to China is not entirely clear except that there is currently little way for a large group of township, city, or county officials to get the citizens on their side and collectively advocate to the provincial or central government. It is a relatively closed system with few points of access.

**Shifting Public Values: Marketization and Performance Management**

Within American local government, the New Public Management emphasis on performance management is probably a permanent addition to the concerns of the public manager. This has been driven by numerous dynamics, including tax and expenditure limitations, numerous economic downturns renewing the traditional American value of minimalist government (i.e., the Tea Party successes), and economic globalization.

Starting in the early 1980s, the natural American tendency toward the competitive capitalist model moved more strongly into government. This was driven by many factors, including an economic downturn and the election of a Republican president on a decentralization and anti-government platform. In addition, globalization had advanced dramatically since the 1950s due to dramatically reduced communication and transportation costs, and so governmental inefficiency also became an international competitive liability.
Micro level forms of governance include the market, hierarchy, and networks (see Table 4). These are comparatively new to the Chinese policy debates, yet a significant part of today’s China. It is much more likely in China than in the US that market forces show up as state-owned enterprises rather than a truly private marketplace. For example, airlines, the oil and gas sector, and mobile telephone companies, are almost all state-owned enterprises in China. These have little public ownership in the US. The robust economic development of China in the past 30 or so years has much to do with harnessing these market forces.

The “driven by the market” approach is true for the state and local governments in the US as well. When new policies or programs have been developed in the last 30 years, one of the first questions is “who are we going to contract with to get this job done on time and on budget?” The baseline thought is seldom about government directly delivering the new good or service.

Table 4
Micro-Level Forms of Governance

<table>
<thead>
<tr>
<th>Relational Tie</th>
<th>Market</th>
<th>Hierarchy</th>
<th>Network</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Administration Paradigm</td>
<td>New Public Management (market-modeled)</td>
<td>Classic Public Administration</td>
<td>Collaborative Public Management</td>
</tr>
<tr>
<td>Institutional Frame of Reference</td>
<td>Businesses, Corporations</td>
<td>Public Bureaucracy, Weberian</td>
<td>Partnerships, Coalitions</td>
</tr>
<tr>
<td>Mixed Forms</td>
<td>Contracts as hierarchical, structuring documents</td>
<td>Market-like features; profit centers, fiscal controls</td>
<td>Multiple partners, inter-jurisdictional arrangements, and formal rules for framework</td>
</tr>
</tbody>
</table>

Source: Adapted from Powell (1990).

The network aspect as an alternative is particularly alive and well in metropolitan areas where special purpose units of government have institutionalized the collaboration on issues that cross multiple jurisdictions. Sometimes these truly mix in urban areas and one city will contract with a neighboring city to deliver a service, or the two will agree to exchange services.

The end result of the NPM has been a separation of the strategic or policy level, and the implementation or operational level. Quite often the state or local government contracts with a private sector firm to deliver goods or services at that operational level. Even things such as secondary schools, prisons, bridge building, information systems, and road maintenance are now frequently delivered under contract with a private sector firm. This makes political accountability a real challenge and the wording of legal contracts has become an important topic of study in public management (Pollitt & Bouchaert, 2011).

However, the contract approach has also made it easier to set clear performance measures and expectations for customer service ratings. There may even be explicit bonuses or penalties written into contracts for achieving certain targets, or failing to meet those targets. In this environment the contract managers and the lawyers become key public administrators. This “hollow state” phenomenon brings into question the power of modern government to get things done. Politicians need votes, and so customer satisfaction becomes relevant under New Public Management (NPM). Government can even be viewed as just another business selling a product. This dynamic is not necessarily possible in today’s China as leaders and politicians do not need votes. Fear of corruption and actual arrests/convictions for corruption are a daily concern in China, and many such cases are because programs were outsourced or developments were approved with clear kickbacks to government officials from the contractors. This used to be a serious concern in the US and so it is possible
China could learn much from modern accounting and accountability tools at the state and local level. However, the lack of a stable rule of law system is perhaps the biggest challenge to controlling corruption, and this is a system fix that can only come from the central government.

**Shifting Public Values: Access and Responsiveness**

Along with and perhaps competing with market values are the demands for access to government and responsiveness from government. The value of “access” means democracy is about more than elections, and so people must be able to know about and use government services. The value of “responsiveness” requires public sectors to understand citizen wants and needs, and to deliver them whenever possible. The twin values of responsiveness and access have become more important in the NPM era as failure to meet such values reduces customer service ratings.

Access is usually about transparency and openness in government. In most US states, the same Freedom of Information and Open Meetings laws that apply to state governments will usually apply to local governments within that state. “Government in the Sunshine” is a common expression for this. Access is not a new American value, yet technology has enabled government and citizens to better realize it.

Responsiveness can be strongly driven by e-government. For example, most people have a smartphone these days. Combining the geographic positioning system (GPS) on that smartphone with a website or phone app, can allow instant, detailed reporting of problems by residents. Problems can quickly get conveyed to the officials who are responsible for fixing those problems, such as the size of a pothole in the road including a picture of the problem and the exact GPS coordinates. This is democracy from the bottom up. Elections are probably less important to most citizens, than getting their needs met. So the challenge with using such a system is that a loss of legitimacy will ensue if reported problems are not adequately addressed!

“Data Driven Decisions” and their counterpart, benchmarking, are examples of improving the quality of the access and responsiveness. They may be intricately tied to the performance management theme of the NPM. Internal database systems can now be used to track problems and delivery of solutions across an entire city. The hope would be that data instead of politics, instinct, or the “loudest voice in the room” can drive public sector decisions. Technology, however available, may not always deliver this change in the culture of government. Using data to drive decisions requires a high level executive commitment to protect the data analysts and their managers from low performing operational managers and partisan politicians.

While it might be easier in China to insulate data analysts from operational managers, the basic level of technology in much of China still lags behind what is needed to truly harness e-governance. For example, the internet speed is quite slow compared to in the US and so while 4G has been introduced for selected mobile networks, most of China does not have functioning 3G speeds. Even large universities and government agencies that would usually have the most bandwidth in the US have quite slow access in China. In addition, many aspects of e-governance assume that most service recipients are able to access websites via a computer while most households in China do not have such access. The urban-rural technology divide is large in North America, but much larger in China. Nevertheless, starting to instill values such as access and responsiveness might be possible now even if the accelerator of such values, technology, is not yet at hand for either the Chinese local governments or their citizens.

A clear exception are innovative programs such as in Yichang, China, where 1,100 neighborhood-level employees have been provided with specially designed handheld devices that allow direct reporting into a
well-developed e-Governance system, thus seeking to provide better citizen access to local government services as well as seeking to hold local providers accountable for solving problems in a timely manner (Zhu & Mingus, 2015).

**Inter-Local Cooperation**

While this can be viewed as part of performance management (i.e., increasing efficiency and effectiveness) and increasing responsiveness, inter-local cooperation is a newer topic in the literature and more directly linked to the network approach than the market approach. In addition, part of the reason they are widespread in the US is because of the fragmentation of urban areas described earlier.

Inter-local efforts in the US can develop from explicit state directives, in response to state or national funding opportunities, or because of a perceived need to cooperate in order for each local government to succeed. However, one of the challenges is always balancing the governance system when numerous different size governments are trying to work together. Higher levels of government may induce inter-local cooperation either with a stick or a carrot. Michigan’s current governor basically offered cities better financial support if they can show they are working together, and even more support if they consolidate into one government. The success of his approach, assuming the intent was sincere, has been limited because Michigan is in a decade-long economic downturn. The system simply does not have the money to follow through on the carrot offered by Governor Snyder.

Similarly, fiscal decentralization has been a major topic of study in China (Wang & Ma, 2014) and inter-local efforts are also strongly desired. Common goals, negotiation, clarifying responsibilities and rights, and guidance from higher-level governments are the four keys to promote inter-local efforts in China (Ma & Li, 2011, p. 213). Ma and Li (2011) saw that the common goals of the inter-local efforts include the management of ecological environment, regional integrated security management, management of natural disasters, controlling infectious diseases, and other public crisis. Moreover, the cooperation across local governments is also to capitalize on opportunities for economic and social development.

The central government and provincial-level governments in China can promote and coordinate such inter-local efforts. Both lack of information and lack of perceived common interests are often the barriers to cooperation; however, higher-level governments can guide local government through planning and enforcement measures (Ma & Li, 2011, pp. 208-209). This topic of study is relatively new to China and therefore is an area where China may be able to learn much by studying American state and local government.

**Possible Implications**

China and the US have significantly different political and administrative structures. Chinese subnational governments are constrained by both the reality and perception of control from the central government. The above discussion of potential barriers as China seeks to learn from American local government focuses on the different governing structures (federalism, decentralization), states and local governments as incubators of new policies and programs, the number and size of subnational units of government, America’s elected council-manager form of government that is most prevalent for cities and counties, the emergence of market-driven values in different ways in each country, and inter-local cooperation. These fit mostly into the sixth dimension of the Dolowitz and Marsh Framework—What restricts or facilitates the policy transfer process in keeping with the initial goal of this paper.
While the differences are strong in some areas and similarities may be harder to identify, different systems can effectively learn from each other as Wilson surmised 120 years ago. The key is for China to be conscious of such issues as it seeks to learn from abroad and the goal of this paper was to provide a higher level of consciousness (and some data) for such a discussion. The focus of this paper is not meant to imply that the US can’t learn anything from China—as it certainly could—but rather, that would be an entirely different discussion. So, what has been learned?

**Different Governing Structures**

States have autonomy in the US federal system within their sphere of jurisdiction, which makes it difficult to compare them with Chinese provinces. In China, the central agencies and the political party can both exert much more influence and power on local and provincial governments. This suggests that learning from program-level implementation might be more possible than learning from policy formation and adoption. It also explains why “local government” in the Chinese context usually is thought to include the provinces. However, American state-local relationships might still be comparable with Chinese province-local relations as this is a hierarchical system rather than a federal system. The exception might be the national role in China for appointing and removing the highest level local officials. Another factor here is to keep in mind that the US, because of this situation, truly has 50 systems of local government. Which ones are worth learning from and why? This might depend on what a specific province or city in China is interested in learning.

**States and Local Governments as Incubators**

While the US national government learns from (or adopts) policy and program ideas that appear to have worked in numerous cities or states, in China it is more likely that the central government creates a general policy and then seeks to learn from different ways the policy is implemented at the subnational level. In the next round, the central government can then refine a more specific policy if desired, to narrow the variance at the implementation stage. Also, within the US, the national government primarily works through the state governments to reach the municipal governments. In both systems it seems to be understood that learning can happen at multiple levels and then be replicated elsewhere, but the general tendencies described seem to run in opposite directions.

**Number and Size of Subnational Governments**

The size and scope of subnational governments is an area where significant cross-national differences exist. US cities and states are small compared to Chinese cities and provinces. There are only nine US cities with over one million residents—and the 2010 US Census shows just nine metropolitan areas with over five million residents and 30 metropolitan areas with over two million residents. One implication is that if China wants to learn from US state and local government, it should consider limiting research to the ten largest cities and the five largest states. The exceptions might be if the goal is to learn how to manage small Chinese cities or rural/frontier areas in China.

Secondly, American cities do not implement the same scope of activities that Chinese cities implement, with education and health systems being the clearest examples. Chinese mayors and city governments do actively control those substantive areas rather than separately elected K-12 school boards or the largely privately owned US healthcare system. This suggests that seeking to learn from the implementation of specific programs might prove useful, but that studying general citywide management in the US might not prove so useful because of the comparatively smaller scope of activity of most American city governments.
Elected Council-Manager Form of Government

While local-level politicians provide a voice that state governments must contend with in the US when making policy decisions or crafting the budget, the dynamics of American city management currently seek to keep politics at the executive levels rather than infusing politics and ideology into all levels of municipal governance. In most American cities the mayor is a “political head of state” but is no longer the “chief executive officer”. These functions are usually subdivided and the city manager or county administrator is the buffer between the officials and the professional public managers. Appointments recommended by the Communist Party of China run much deeper into Chinese public management, as does a party membership requirement and ideological training. Thus, many officials hold a title within government and within the Party and so they may seek to influence decisions at higher levels of government by working through the Party apparatus rather than by seeking to change the minds of the voters or the general public.

The Shift in Public Values (NPM, Access, and Responsiveness)

The movement toward marketization of public services has been extensive in both the US and China; however, within China it is more likely that this happens via state-owned enterprises rather than to deliver public goods and services via private-sector enterprises. This suggests that business principles are increasingly used in both places, yet state-run monopolies and oligarchies restrict the competitive nature of the marketization in many cases within China.

Access and responsiveness are often viewed as important values for the NPM concepts to function well and both are still constrained in China. Significantly, transparency might be increasing for the government in China but not for the Party. This means that more data about programs is becoming available in many cases, but the political decision making process is a “black box” to those outside the local, provincial, or national Party hierarchy.

In both these areas, then, China might be able to learn from American examples. Yet without changes to the higher-level existing governing structures it is difficult to picture significant progress on such public sector values and the purpose of this paper is not to argue for or against high-level institutional change.

Inter-local Cooperation

Chinese researchers are increasingly focused on interlocal cooperation and collaboration. Because of the basic fragmentation in American urban areas, this is clearly an area where China might be able to learn much from US sub-national government. Specifically, the US has many decades of experience seeking to solve problems and even merge services across metropolitan regions where multiple cities have their own ways of doing things. The spread of special purpose units of government in these metropolitan areas was highlighted in Table 2 and shows extensive movement from cooperation toward collaboration and even substantive mergers in specialized areas (i.e., transportation, arts districts, water and sewer, public safety, etc.).

Conclusion

American cities and counties are not controlled by the state and national governments, or by the political parties, in the way that the central government and the Communist Party of China control Chinese subnational governments. Independently elected councils and commissions create a legitimacy and political clout for American cities and counties, while federalism creates a large degree of independence for the States. These are significantly different institutions of government, but the above implications suggest that there are still areas
where China can learn from American state and local government if they do so in a conscious manner that fully understands the significant differences. For Shanghai to learn from Des Moines seems highly unlikely, yet for Chengdu to learn from the three or four largest American school districts might be realistic. For Hubei Province to learn from South Dakota seems a remote possibility, but for Western autonomous regions to learn how to protect their grasslands by studying South Dakota might be a good match. The complexity of both nations, culturally, economically, politically, and geographically, means that the context of learning must be seriously examined rather than simply taking action based on a few well-done “best practices” articles in the top journals! This article is simply one step forward in understanding this complexity.

References


