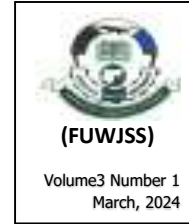


COMPARATIVE ANALYSIS OF PUBLIC ADMINISTRATION IN UNITED STATES OF AMERICA, SOUTH AFRICA AND NIGERIA



Abdullahi Mustafa Sheikh

Department of Political Science, IBB University Lapai,
Niger State, Nigeria

Abstract

Efforts have been made to democratized government and make it more responsible and compatible to development needs. This study examines public administration in Nigeria with the aim of comparing it with public administration in the United States of America (USA) and South Africa. The study relied on secondary sources of data. The study's findings portray the community as a consumer market, where citizens are consumers of public services and governments are providers. The paper concludes that Nigeria has a lot to learn or gain from the system of government administration in USA and South Africa. Succinctly, high revenue stability and consistency in effective service delivery form basic characteristics of public administration in USA and South Africa. The study recommends that the sacking of elected local government council executives by states governors in Nigeria should be revisited constitutionally. In addition, elections into all the local government councils in Nigeria should be fixed by the constitution.

Keywords: Good Governance, Efficiency, Effectively, Democratic, Counterpart, Administration

Introduction

Public or government administration globally has come of age, primarily because of its longevity, resilience and significance of its impact in the administrations of both developed and developing countries (Igbokwe-Ibeto, 2013). However, its efficiency and effectiveness is not so much impressive in developing countries such as Nigeria, Ghana, South Africa etc. In a country where federal system of government is being practiced, firmly maintained and implemented by its constitutional provisions of their government system and as specified within the domain of the states, such as USA, South Africa, Nigeria just to mention but a few. The detailed provisions of their constitutions, listing powers and functions (including

taxing powers) remain only a vehicle of determination to the public or government powers, functions and Funds which is the prerogative of the states. In a country like India the two amendments of 1993 acts provide a broad framework in which the states must operate and function but leave to the discretion of the states which of the long list of functions panchayats or municipalities may exercise. Likewise, the Nigerian constitutional provisions are not directly operative but must be mediated by state law (Fatile and Adejuwon, 2015).

The process of achieving public government that would have engendered effective and efficient service delivery was not visibly seen in Nigeria, from the pre Colonial era to the 1975 local government reform (Adedokun, 2015). As a result of several attempt to bring about efficiency in local government administration and the subsequent government reforms (decree of 1989, 1990 & 1992) have all intended to operationalize the ties status of in Nigeria, therefore, granting a high degree, as well as increase in their revenue allocation and productions (Akhape, Fatile and Igbokwe-Ibeto, 2015). The creation of government in many countries stems from the need to facilitate development at all level and to decongest the functions and burden of central government, to bring about democratic climate of opinion, to prove valuable political education, to provide two-way communication, to ensure even and rapid development (provide basic socio-economic services), to serve as a hedge against over-concentration of power; to maintain law, and order etc. (Ntiwunka, 2015). It is usually created by a law to the central government in a unitary system, and the law of the state in a federal system of the state. Through the public administration, the work of the government is decentralized on a territorial basis thereby making it possible for the inhabitants of communities to take part in the management of their public administration affairs (Oyediran, 2009; Abba, 2008).

There have been concerted and sustained arguments that the government administration areas especially in Nigeria are contributing too little to national development. Overtime, many of its councils seem not to bother about the statutory responsibilities as contained in the fourth schedule of the (1999, constitution). Although, this is contrary to what happens in the developed countries like United States of America where they build and maintain roads, creates jobs and bring government closer to the people (Fatile and Adejuwon, 2014). The Nigerian public administration system has changed from being an organ of bringing government and dividends of democracy closer to the people at all level, an organ for compensating political acolytes of the ruling parties in the states. This has created serious problem and has continually hampered good governance and development at all level. Thus, there is the need to curtail

this situation so that public administration can fulfill its purpose for which it was established.

Overview of Public Administration in Nigeria

Public administration in Nigeria had always been in existence since time immemorial among the various people even before the colonial era set the administration of Nigeria (Awofeso, 2004). The history of public system in Nigeria is older than the advent of the erstwhile colonial masters (Fatile and Adejuwon, 2014). Colonialism, however, assisted to widen the course of history of Nigerian administration systems as it contributed significantly to the origin of modern Administration in the country (Fatile, 2015). There had been traditional administration in Nigeria before the advent of the British system of public administration. Prior to Colonial era, there were in existence in most Africa enclaves, local administrative machineries founded upon traditional institutions (Agbakoba and Ogbonna, 2004). In Nigeria today, the existing tribes that make up the geographical areas had already had one form of administration of governance or the other (Osakede & Ijimakinwa, 2015).

In the Northern part of Nigeria, the Hausa/Fulani practiced a highly centralized form of government with the Emir at the head as both the political and religious leader (Fatile, 2011).

The Emir, however, delegated his power to District heads (the Magajis) to oversee the districts that made up the emirates. OIa and Tonwe (2003) noted that the Hausa emirates had developed a well-organized fiscal system, a definite code of land tenure, a regular scheme of public rule through appointed district and village heads, as well as trained judiciary which administered the Islamic laws. In the South West zone of Nigeria where Yoruba is the principal ethnic group, the unit of administration in the various communities centered on the chiefs. Organizationally, the hierarchical structure of the Yoruba pre-colonial political system was based on, the Oba and his Senior Chiefs were collectively responsible for major decisions and administration to the centre, the headquarters or the empire's capital (Oyeweso, 2004).

The Igbos are the major ethnic group in the Eastern part of Nigeria. And as Awofeso (2004) has noted, that the Igbo pre-colonial political system has been described as a cephalous, republican, fragmented and segmented. There was no sort of central authority, what they had was a diffusion of political authority into different groups (Fatile and Adejuwon, 2014). The public administrative system during the colonial era started with the introduction of indirect rule by Lord Lugard. Ola and Tonwe (2003) asserted that the idea behind the introduction of indirect rule was to preserve the authority of the local rulers, institutions, traditions and habits rather than

attempt to impose totally new and unfamiliar ideas from outside. The Government ordinance of 1950 democratized Native Administration in the sense that about eight percent of the executive were elected in the Eastern Region. The law took effect in the West in 1952. The structure of public administrations differed in both regions. The Eastern and Western regions had a three tier local government system-the county district and local council in the East fashioned after the British system of Local Government (the county Council was abolished in 1958), and Divisional, District and Local in the West. Both the regions discarded the concept of native authority (Fatile and Adejuwon, 2014). In the North, the Native Authority Law of 1954 merely consolidated the native authority and the native and emirate councils were in place (Abba, 2008).

The local government administration under the military was greatly influenced by the military orientation and socialization which formed hierarchical order and centralization of authority (Awofeso, 2004). The military abolished all Local Councils and appointed Sole Administrators. Between 1966 and 1976, public administration in Nigeria went through various reforms at both regional and state levels but the 1976 reform was the major one. The reform introduced the single-tier local government system throughout the country and established governments based on a given population range of 150,000 and 800,000 with equal status and powers (Abba, 2008; Igbuzor, 2007).

Theoretical Framework: Decentralization Theory

It has become a universal phenomenon in social sciences for facts to be investigated or examined precisely within a framework, rather than in an isolated manner, it is necessary to develop a sound theory, which is capable of explaining the wide concepts and relationships in the study. The importance of theoretical framework in a study lies in the fact that social science research is theory based and its operations are guided by relevant principles of human behavior (Goode and Hatt, 1952). Therefore, this study seeks to understand the 'comparative administration' within the ambit of the Decentralization Theory. The fact that the theory of decentralization explains the transfer of authority and responsibility for public functions from the central government to the subordinates make the decentralization theory more suitable and appropriate for this study. Thus, Nigeria operates political as well as fiscal federalism. It follows therefore that many developed and developing economies that particularly operates the federal system of governments tend to decentralize some aspect of their public Affairs. Browsing through the concept of fiscal federalism is important for a fair understanding of the local government administration and options

available to the local government for development especially in a tripartite presidential system.

The philosophy behind decentralization is that sub-national government (which local government is part of) must be given power over their own life and development (Nyerere, 1972). Thus, decentralization by definition implies that sub national governments or entities take over functions from federal government and thus come to manage their own financial resources than would be the case under a centralized government (Tanzi,1995). In the literature, two major forms of decentralization are discerned; namely, de concentration and devolution (Olowu, 1995). The former alludes to the transfer of state responsibilities and resources from the center to the periphery, within the same administrative system. It indicates an internal form of delegation of responsibilities among officials of the organization.

On the other hand, devolution entails the transfer of specified responsibilities and resources to the community, who are usually represented by their elected (i.e. non-appointed) officials. For most African governments, however, decentralization is now viewed as a strategy for mobilizing local resources and an initiative for national development. Since it has become evident that federal or state governments, alone, cannot guarantee development in the local areas, it then becomes imperative for the power, authority, and responsibility to be transferred from the central or state government to the local government for the purpose of enhancing development in the rural areas. This is important because of the remoteness of the federal government to the rural people. It is believed that decentralization would make the local governments more competent in the management of their own affairs. The 1976 local government reform, in particular, was aimed at decentralizing of some significant functions of the state government at local levels in order to harness local resources for refined development. This framework will, therefore, enhance scientific understanding and stands as an operational tool for this study.

Comparative Analysis of Public administration in USA, South Africa and Nigeria

A comparative study of public administration of other countries is very important to the existence of any given state because it helps the state to evaluate itself and improve on what it has, in terms of structure, functions and operations. The goal of comparative analysis is to encompass the major political similarities and differences between countries. The task is to understand the nature of constraints and variability which characterizes the world's governments, bearing in mind the national and international contexts within which they operate (king *et al*, 2014). Munro (2015)

observed that comparison broadens our understanding, casting fresh light on our home nation, improves our classifications of political processes, enables us to test hypotheses and gives us some potential for prediction and control. In the early days of the United States, communities were idealized as civic Republics (Tom,2014). In a civic republic, community government is based on the principle of mutual consent. Citizens share fundamental beliefs and participate in public affairs. These two theoretical orientations, the community as a civic republic and the community as a corporate enterprise, remain viable.

A new orientation has emerged, however—one that portrays the community as a consumer market. In a consumer market, citizens are consumers of public services and governments are providers (Osakede and Ijimakinwa, 2014). United States of America operates general-purpose and single-purpose of administration. General-purpose governments are those that perform a wide range of governmental functions. These include three types of public administration: counties, municipalities, and towns and townships. Single-purpose public administrations, as the name implies, have a specific purpose and perform one function. School districts and special districts are single-purpose governments. Thus, public or government administration in United States of America is classified into five types: these are Counties, Municipalities, Towns and townships, School districts and Special districts (Fatile and Adejuwon, 2014).

South Africa, in the year 2000 the old public government system of South Africa was replaced with a new, streamlined structure. The new system was designed to drive the government's transformation programme by delivering clean water, electricity, schools, sewage treatment and roads to the Poorest communities in the country. South Africa public administration consists of Metropolitan municipalities, District Councils and Local Councils, each of which serves a different part of society. Although the number of authorizes described as a result of the public administrative restructuring, their role did not as they now became responsible for much of their socio-economic delivery (Fatile & Adejuwon, 2014). Indeed, the 1998 Government White Paper advanced a concept of a Development public administration, determining that from that point onwards the government would pursue integrated development planning. Integrated development planning would take place in the context of intersectional partnerships, requiring, alongside other vested interests groups. Developmental public administration was now viewed as a vehicle for South Africa's development, even to the extent that some observers have been an anticipant to decline in the power of provincial government (equivalent of state government in Nigeria) relative to the local government structures (Afegbua, 2015).

Unlike the evolutionary character and structure of government in the USA and South Africa, Nigeria had a highly centralized government structure pre-1980 Report, in which people and communities were little involved in a decision making. Local government services were poor and depended largely on funds and personnel provided by the national government. (Osakede & Ijimakinwa, 2014). Successive governments in Nigeria since independence have looked to a vibrant public administration system to aid the country's development. Attempts at decentralization of power were introduced in 1974 and 1983. The stated aim of the public service reform was to transfer functions, powers, means and competences from the central government to other tiers of government, and to establish a forum at the different level where a team of development agents, representatives of the people and other agencies could discuss the development problems of the district and/or area and their underlying causative factors. On an ideological level decentralization was expected to support democratic participatory governance, improve service delivery and also lead to a rapid socio-economic development.

The process of decentralization continued and was not endorsed by Nigeria's multiparty government that came into power in 1999. It consolidated the aim of decentralization within the new framework of liberal democratic constitution. Recently, to promote the decentralization efforts, Ministries, department and agencies has developed and is implementing a National Decentralization Action Plan, which was endorsed by the cabinet in February 2022. The plan being implemented aims to: promote participation and partnerships; strengthen sub-district governance; strengthen functional and governance performance of the district assemblies; strengthen financial and human resource management; consolidate funding; enhance policy management; strengthen political leadership and inter-sectorial collaboration.

The Municipal/Metropolitan/District Assemblies (MMDAs) derive their revenues from the District Assembly Common Fund established under the 1999 Constitution, representing not less than 5% of annual revenue and shared among the MDAs according to a formula devised by cabinet and approved by parliament, ceded revenue such as taxes from gambling, betting, Casinos, advertisement, entertainment duty etc, donor funding especially micro-finance, and other sources.

Public administration Lessons for Nigeria from USA and South Africa

In United States of America for instance practices multi-tier system of public administration and has 50 states. They have four types of governments, the legislature, executive, judicial and info graphic as power are vested on all arms government. Also at local level, there are five types

of government system. These are the Counties, Municipalities, Towns and townships, Special districts and School districts. The number of government varies from state to state. For example, Pennsylvania had 4,871 local jurisdictions. The state contains 66 counties, 1016 cities, 546 townships, 1728 special districts and 515 school districts.

On the other hand, Nigeria operates a three-tier system of Government. This is based on a given population range of 150,000 and 800,000 with equal status and powers. As a third tier of government, it receives statutory allocations from federal government. Today, Nigeria has a total of 36 states, with federal capital, 774 local governments. But Local government has no status in the American constitution. State legislatures created local governments, and state constitutions and laws permit local governments to take on some of the responsibilities of the state governments (Wilbert, 2011) and in Nigeria. In United States, local governments have legal capacity to raise additional revenues themselves, especially through local option sales and income taxes. A share of gasoline, tobacco and other, tax benefits is greatly appreciated. In Nigeria, section 2 of the fifth schedule of the 1999 constitution strengthened the financial resources of local governments through federal allocation to 1 local, governments (Constitution, 1999).

The idea of Electoral College is unique to America. A candidate may lose in the popular vote and yet win through the Electoral College. In Nigeria, State Independent Electoral College conducts all elections into levels of government councils at different periods. The system of direct election is used by the electorates to elect their leaders. Successful decentralization entails giving local government a clear mandate, architecture, and functions, and considerable discretion over the use of its funds and implementation, to obtain alignment with preferences. The discretion given to levels government is meaningful when adequate financial resources are provide, and when consideration of spending needs is tempered with a sufficient measure of locally raised taxes to pay for services rendered. With the scrutiny of tax payers, and a public that not only elects a council but insists on direct participatory democracy, government is expected to be responsive, and yet spend within its means, and to search for efficiencies and innovation in the delivery of services. Through an appropriate national policy and legal framework, government is also provided with ongoing guidance and mechanisms for working in concert with national institutions to pursue national goals.

Writing in the 1923 case of *New State Ice Company v. Liebmann*, U.S. Supreme Court Justice Louis D. Brandeis commented, "it is one of the happy accidents of the USA federal system that a single courageous state may, if its citizens choose, serve as a laboratory, and try novel social and

economic experiments without risk to the rest of the society,” Brandeis’s observation was valid in 1923 and remains valid today. American state and local government is proving flexible, innovative and effective in meeting the challenges and adapting to change in a period of time. In South Africa the central government is responsible for areas of external relations, defense, education, environmental management, tourism, development and national legislation. Many areas of responsibility are held concurrently with provincial administrations. In practice this means that the national government determines the policy whilst provincial governments are responsible for implementation (Afegbua, 2014). In South Africa the conduct of public administration in any sphere of 9 government provinces which can be investigated by the Public Protector. Apart from investigating the conduct of public administration, the public protector has to take any remedial action she/she deems necessary. Thus, in many ways the public protector resembles in official known as the ombudsman. On the financial aspect, the Auditor General is required to audit and report on the accounts and financial management of all local authorities.

Conclusion and Recommendations

Prior to public administration reforms in Nigeria, levels of government were shown to democratic principle. The overbearing power of federal and State government over local councils had significant negative impact on the backwardness of local government council in terms of meaningful and enduring development at the grassroots tilting the pendulum in outrageous subjugation and oppression of the local government apparatus by the state government. Nevertheless the paper observed some precincts and proffers solutions. In order to promote public administration and strengthening its operations and ensure effective democratic governance in Nigeria like U.S.A. there is the need for levels of government to look inward and tap internal sources of revenue generation rather than depending on the allocations from the developed society’s governments that are neither adequate nor delayed unnecessarily.

In addition, public administration should be empowered to generate advancement from other internal Sources like taxes. Effective service delivery of which level of government is a function of financial autonomy of government. The more revenue government can generate on its own, the more efficient and confident it can become particularly in relations with other tiers of government (Fatile, 2015). Encroachment in the affairs of public administration is a threat to government operations and democratic governance. Therefore, the constitutional provision that made government an authentic body must be respected by all and sundry. Thus, the different

states under which the government was set up must not encroach on the revenue base or the territory of their governments.

Public administration must be self-determination or self-governance, therefore, state and central governments should shed their direct involvement and financial expenditure of government. Thus, the central and state governments should only allocate funds for the use of local government and leave the latter to run its own programmes. For government to be possible there is need for fiscal sustainability, so that future revenues are stable, predictable, and adequate for service needs (Marcellus, 2009). Governments are to provide full budget transparency so that interested citizens have online access to spending and taxing data. The online data bases in Iowa, Kansas and Texas encourage public understanding of financial complexities and solicit interaction through budget calculators and simulations (Mello, 2019). Furthermore, the Introduction of direct allocation by the federal government will reduce the incidence of 'zero allocations' to the levels of governments as a result of the practice of 'deductions at source' by the states' chief executives. The sacking of elected council executives by the states' chief executives in Nigeria without observing the rules for reasons that more often than not border on sheer politics should be revisited constitutionally. In addition, elections into all the local government councils in Nigeria should be fixed by the constitution. Election of officials at the local government level must be democratic. Therefore, participation of the citizens in public affairs should be the basis of choosing government officials. The idea of "Godfathers" in politics at the local level should be discouraged. Finally, since government councils have become too political, fundamental structural changes that would reduce partisan politics by the levels of government officials are necessary for effective democratic governance at all levels.

References

- (BPA) Project, Department of Public Administration, Ambrose Alli University,
Abba, U. E. (2008). *Modern Public Administration*. Onitsha. Abbot Books Ltd.
- Adamolekun, L. Olowu, D. and Laleye, M. (1988). *Local Government in West Africa since*
- Adedokun, J. (2012). *Is Africa Democratizing?*. Lagos. Maithouse Press Limited.
- Adejobi, S. O. (2011). *Administrative Organogram and Policy Implementation in the Local Administration in Nigeria*. Lagos. Rakson Nigeria Ltd.

- Afegbua, S. I. (2011). Developing Leadership potentials at the grassroots level in Nigeria,
- Agbakoba, O. And Ogbonna, H. (2004). public Administration and Development in
- Agbodike, F.C, Igbokwe-ibeto, C.J and Nkeh, B.C. (2014). Local government administration and
- Akhape, I, Fatile. J.O and Igbokwe-ibeto, C.J. (2012). Local government and the challenges of America. Luis.
- and Management. Ibadan. Tems.
- Anifowose, R. and Enemu, F. (1999). Elements of Politics. Lagos. Sam Iroanu Publications.
- Anyaele, J. U. (2003). Comprehensive Government for Senior Secondary Schools, Lagos.
- Awofeso, O. (2004). Issues in Government Administration in Nigeria. Lagos. LIS Johnson
- Bamgbose, J. A. (2011). Traditional institutions and central government. Ibadan. Pev.
- Community and rural development in Nigeria; the way forward. South Africa. Pass press.
- constitutionalism and Demilitarization.
- Contemporary issues in Local government Administration in Nigeria. Lagos. Rakson Nigeria limited.
- Desantis, V. S. and F-till, D. (2004). Citizen Participation in Local Politics: Evidence from New Ekpoma, Edo State
- England Town Meetings, State and Local Government Review. U.K. Tess.
- Fajonyomi B., and Fatile J. (2014). Contemporary issues in Local Government Administration in
- Fatile, J.O. and Adejuwon, O. (2014). Comparative Local government and Public Administration.
- Government Administration in Nigeria: Old and New Visions. Lagos. Centre for Government in France and Nigeria.
- Government. Lagos. Rakson Nigeria Ltd.
- [http://www.dawodu.com/otivel .htm](http://www.dawodu.com/otivel.htm)/Accessed feb 5, 2016.
- <http://www.gamj.com/>accessedJanuary 10, 2016.
- Hume, S. and Martin, E. (1969). The Structure of Administration, The Hague: International
- Igbokwe-Ibeto, C.J. (2003). The Effectiveness of Local Government in rural Development in Nigeria. Lagos. Trust Publishing.
- in Nigerian Local Government. Ibadan. University Press Limited.
- Independence. Lagos: University of Lagos.
- Johnson Publishers Ltd.
- Lagos. Raskson Nigeria Ltd.

- Igbuzor, O. (2007). Local Government Reform and constitution review in Nigeria. Delta. Pts press.
- Igbuzor, O. (2009). Local Government and Constitution Review in Nigeria. Dawodu Corn. Enugu.
- Marcellus, I. (2009). Local Government and Constitutional Elasticity' in Odion-Akhaine local
- Ndolo, I.S. (2005). Understanding national Integration and nation building. Abuja. ZP Ltd.
- Nigeria, Lagos. Rakson Nigeria Limited.
- Nigeria. A Study of Ngor Okpala Local Government of Imo State. An unpublished
- Nigeria. Ibadan. The Caxton Press.
- Nigeria. Lagos. Hurilaws.
- Nigeria. Nsukka. Conference Papers.
- Ntiwunka, G.U. (2011). Comparative study of Autonomy and Democratic status of Local
- Odoh, A. (2015). Autonomy of Local Governments: Myth or Reality Unpublished University of
- Ola, R. O. and Tonwe, D. A. (2003). Local Government Administration and Local Government
- Ojo, O. (2009). Efficient Management for local government: The Nigeria Experience. Ilorin.
- Olojede I. Fajonyomi., and Fatile J. (2013). Contemporary issues in Local Government
- Orewa, G.O. (2002). Local Government in Nigeria: The Changing Scene. Ethiopia. Publishing Corp.
- Oyediran, O. (1988). Essays on Local Government and Administration in Nigeria, Lagos: Project
- Oyefeso, O. (2003). Comparative Local Government and the Nigerian Experience In Readings P.T.H. Publication Ltd.
- Resources Publishers.
- Sanda, A. (1976). Ethnic Relations in Sociological Theory in Ethnic Relations in
- Syara, J. (1990). Official Leadership in the City. New York. Oxford University Press.
- the challenges of sustainable development in Nigeria. Review of Public Administration
- Union of Local Authorities. America. Puss.
- Univevrsitajiiipetritgase din Ploiesti.
- Urban Affairs Quarterly. Washington. Rake.
- Whalen, H. (1970). Ideology, Democracy and function of Local Self-Government in Feldman.

- Wheare, K.C. (1963). *Federal Government*. London. Oxford University Press.
- Wirth, C. J. and Vasu, M. L. (1997). *Ideology and Decision Making for America Managers*,