

Implementation study contributions to education policy analysis: a brief discussion of the context of BNCC implementation¹

Contribuições dos estudos de implementação para a análise de políticas educacionais: uma breve discussão do contexto de implementação da BNCC

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ABSTRACT

By turning to contributions from the fields of Political Science and Public Administration, the present article aims to conduct a brief review on implementation studies, originally divided into two contrasting schools. It also discusses Matland's (1995) synthesizing model developed in the 1990s to reconcile such approaches, by articulating two important attributes by which policies are differentiated. Finally, it investigates how levels of conflict/ambiguity have varied in recent education policies, especially those focused on curriculum standards, such as the *the Parâmetros Curriculares Nacionais* – PCNs [National Curricular Parameters] and *Base Nacional Comum Curricular* – BNCC [Common National Curricular Base].

Keywords: Policy implementation. BNCC. PCNs. Curriculum.

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RESUMO

Recorrendo a contribuições de autores do campo da ciência política e da administração pública, o presente texto traça um breve histórico dos estudos de implementação de políticas, originalmente divididos em duas abordagens consideradas antagônicas. Em seguida, explora um dos modelos de síntese desenvolvidos a partir dos anos 1990 para superar tal dicotomia (MATLAND, 1995), a fim de produzir uma análise inicial sobre a forma como as variáveis ambiguidade e conflito vêm sendo articuladas em políticas educacionais curriculares recentes, como os Parâmetros Curriculares Nacionais (PCNs) e a Base Nacional Comum Curricular (BNCC).

Palavras-chave: Implementação de políticas. BNCC. PCNs. Currículo.

Introduction

Growing interest can be seen over recent decades in public policies and their effects on the lives of citizens. This interest can be observed in the proliferation of studies on policy implementation, although there are still gaps in how the subject is approached. As Lotta (2019) points out, the term “implementation” is often used metaphorically, denoting only one particular moment of a policy, or as a substitute for the idea of policy execution, without being an object of analysis in itself. Thus, we agree with the author in the sense that incorporating analytical models of public policy implementation could contribute, to a large extent, to the improvement of these studies and their increased contribution to the field, based on the expansion of their potential for analysis.

In the specific case of Brazilian educational policies, implementation studies based on analytical models that dialogue, for example, with references from political science and administration are still incipient. And this contrasts with the more advanced development of studies on policy implementation in the areas of health and social welfare. In the belief that this dialogue can be fruitful, we seek to trace a brief review of the development of implementation studies, exploring their analytical potential for studies on educational policies. We also propose a means of making analysis of the context of recent curriculum policy implementation operational.

We recognize from the outset that literature reviews on implementation abound in both the international debate (HILL; HUPE, 2014; HOWLLET; RAMESH; PEARL, 2013) and the national debate (FARIA, 2012; LOTTA, 2019; BICHIR, 2020), with significantly more robustness than the brief conceptual and bibliographical exploration that this article proposes. However, our goal

is to dialogue more specifically with the field of education, where such studies have also been scarce also because of a conceptual dispute involving the theme, which often is not aware of the origin and trajectory of implementation studies. Often perceived as a sequential and executive step of guidelines formulated at higher levels, which eliminates the critical and creative action of actors in the field of policy in practice, we understand the resistance sometimes seen to the idea of “implementation”. After all, that definition – which dates back to a first generation of studies in the area and which will be returned to in this article – does not do justice to the transformation an educational policy goes through, as it is (re)interpreted, (re)articulated and re-signified in different contexts, beyond the original one in which it was produced (MAINARDES; STREMELE, 2010).

As such, although our main focus of interest is policy implementation, we intend to discuss how this process has long been more than a mere technical step occurring sequentially following policy formulation, the analysis of which could be done in isolation from the continuous decision-making process that characterizes public policy production. On the contrary, *implementation* is understood here as “interaction between actors within the institutional and relational environments present in political communities” (LOTTA, 2014, p. 193, our translation), in which meanings are continually negotiated right from high-level management down to street level. Based on this initial proposal for dialogue with the field of education, which makes this new effort of resumption and synthesis pertinent, we mainly seek to instrumentalize this discussion as a possible analytical lens for illuminating aspects of the implementation of a new educational policy (the *Base Nacional Comum Curricular* [Common National Curricular Base] – BNCC), in dialogue with analogous processes previously identified in the *Parâmetros Curriculares Nacionais* [National Curricular Parameters] (PCNs).

To this end, in addition to the introduction, this article is organized into four sections. In the first section, we address two perspectives of analysis initially developed within organizational studies that have traditionally been presented as antagonistic. The second section explores one of the most consolidated synthesis models in the literature, developed in an attempt to overcome this dichotomy. The third section presents an effort to transfer the analytical principles of that synthesis model to the investigation of the different contexts that have characterized the implementation of two relevant educational policies in the realm of the curriculum: the PCNs and the recent BNCC. The article draws to a close with final considerations, resuming the trajectory of studies on implementation, which have advanced beyond the top-down and bottom-up dichotomy and even beyond the models intended to synthesize the two approaches, and have begun to incorporate the debate on multilevel governance. This, in turn, presents an important potential for analysis by future studies looking at the implementation of the BNCC itself.

Analysis of public policies and their implementation: origins and initial trajectories

In her review study of the international scenario that covered the thirty years prior to its publication, Barrett (2004) indicates the prevalence, until the 1970s, of analyses focused on the process of decision making and public policy making. The preference for this focus would appear to be anchored in a Weberian logic of State operation, which provides a clear separation between the political sphere (decision making) and the administrative sphere (policy execution). Taken from this perspective, it would be difficult for the implementation phase to arouse investigative curiosity, since it would be conceived as a merely operational activity, the carrying out of guidelines.

As of the late 1960s, however, in the context of the Cold War and disputes over State models, growing concern can be seen with the effectiveness of policies and their results. Analyzing the development of public policy studies in the United States, Sabatier (1993) identified a pioneering generation of implementation studies that emerged in the 1970s, in the context of consolidation of anti-poverty programs, taking as a reference the case study by Pressman and Wildavsky (1973) on the implementation of a program in the city of Oakland (California). If, initially, the idea of implementation assumed that the decision of an authority would be automatically fulfilled, the merit of Pressman and Wildavsky's study was to demonstrate how, despite the decision at the central level, program operationalization was subject to numerous mishaps at the local level. This first generation of implementation studies in the 1970s was called top-down and focused in detail on the events undertaken by a single level of decision-making authority, characterized by case studies focused in particular on identifying obstacles to implementation.

One of their main concerns was, therefore, to understand why policies "fail" – assuming that the success of a policy would be measured in relation to the degree of achievement of its pre-established objectives. In this sense, decision making by an agent not considered legitimate for this (bureaucrat) could be seen as one of these explanatory factors, besides being considered a distortion of hierarchical authority.

Authors such as Sabatier and Mazmanian (1979) also sought to identify key elements in policy formulation that might be contributing to this space for agency being opened during the course of implementation. Among the elements were policy objectives lacking in clarity, which allowed for different interpretations and discretionary actions; a multiplicity of actors involved in

policy implementation, potentially creating communication and coordination problems; differences in organizational values and interests, making it difficult to set priorities; and the relative autonomy and discretion of the implementing agencies, resulting in limits being imposed on administrative control. Based on a normative/prescriptive premise, once these elements had been identified, this was followed by a series of recommendations to ensure achievement of pre-defined objectives, such as minimizing the number of actors, regulating the discretion of the implementing agents, as well as attempting to assign policy implementation to agencies aligned with its objectives.

Following this, new studies that had the top-down perspective in common sought to explain differences in the implementation of government programs, privileging high-level decision-making processes, laws and formal arrangements of policy design, considered as the main reference for accompanying bottom-up implementation. The purpose of these studies therefore continued to be to understand how formulated objectives could be achieved, with implementation being analyzed as an explanatory barrier (BICHIR, 2020).

As pointed out by Matland (1995), researchers who adopt this approach are often subject to three main types of criticism: 1) the model disregards the relevance of actions and dynamics prior to implementation; 2) the view of implementation as a purely administrative process ignores (or seeks to eliminate) political aspects; and 3) policy makers are highlighted as the main actors with the greatest legitimacy in the analysis process, while implementing agents are commonly treated as an obstacle to successful implementation.

As Bichir (2020) indicates, the main criticisms of the top-down approach refer to the model being excessively rationalist and simplistic, as well as its being overly optimistic about the formulators' ability to structure implementation, without considering points of resistance and conflict and the political element involved in both formulation and implementation (WINTER, 2006).

Based on these criticisms, the bottom-up perspective was developed in the early 1980s, marking the second generation of implementation studies. This perspective stands out by shifting its focus from the "top" to the "bottom" of the political-administrative hierarchy, that is, to the everyday interactions in which policies and services are delivered to users, with emphasis on street-level bureaucracy (SABATIER, 1993; WINTER, 2006 *apud* BICHIR, 2020).

Taking policy making to be an "iterative process of formulation, implementation and reformulation" (MAZMANIAN; SABATIER, 1983, p. 9), implementation is no longer conceived as an additional and sequential step in the evolution of policy, but rather as a creative process in which local organizations react to plans designed at the macro level and then develop their own programs

and implement them (MATLAND, 1995, p. 148). The parameter for evaluating the success of a policy thus becomes less dependent on its initial objectives, the relevance of which is secondary to the processes undertaken in the contexts where it is implemented, and on which the results depend.

The discretion exercised by the implementing agents is also re-signified as an unavoidable and even desirable adaptive mechanism, precisely because it allows certain norms – often “unrealistic” and impractical (MAYNARD-MOODY; MUSHENO, 2003, p. 24) – to be adapted to the circumstances of implementation, producing positive effects. Having been considered in the top-down approach as one of the main factors that lead to flaws and policy failures, the margin of freedom granted to frontline bureaucrats is now understood as a necessary factor for the success of programs, which depend largely on the adaptive capacity of these individuals. Formulators at the central level would therefore only partially and indirectly influence the processes conducted at the local level, which could explain why the same national policy presents variations depending on the implementation contexts.

In the bottom-up model the emphasis falls on local agents, who become the “explanatory variable” of the implementation process. One of the seminal works in this area is the work of Michael Lipsky (1980), who defines as “street-level bureaucrats” the front-line agents of public services who interact directly with citizens-service users in the course of their work (police officers, teachers, social workers, etc.). The relative freedom that these agents have to determine the nature, quantity and quality of benefits and sanctions distributed to different citizens – referred to as discretionary (LIPSKY, 1980, p. 13) – contributes to them to being considered not only executors, but also “policy makers”. While Lipsky (1980) stressed the relevance of discretion as an adaptive and self-preservation mechanism in a context of work overload and scarcity of resources, authors such as Maynard-Moody & Musheno (2003) emphasize other rationalities that can guide the discretionary action of implementers, highlighting the influence of moral values in building of perceptions about different service users, and in making decisions about allocation of what they need or what they “deserve” to access.

The bottom-up approach is also subject to criticisms, two of which in particular stand out (MATLAND, 1995). One of the criticisms emphasizes that in a democracy, control over policy should be exercised by agents who have legitimacy to do so, having been elected (or chosen as representatives of those elected) to make decisions and formulate action plans, and are thus held accountable for their results. Some level of flexibility and autonomy might be appropriate when there is an alignment between the goals of policy makers and policy implementers. However, if disagreements between these actors

prevail, freedom of action on the frontline could result in poor implementation performance. The other main criticism suggests that bottom-up studies place too much emphasis on autonomy at the local level, while in reality a significant part of this leeway can be foreseen (and manipulated) by more central actors who have the ability to structure implementation contexts in such a way that the objectives and strategies adopted by agents at the local level are also affected. Therefore, the institutional structure in which implementing bureaucrats operate and the resources made available to them are key elements for conditioning their decisions and actions, consequently influencing policy results.

Especially since the 1990s, in the context of the so-called third generation of implementation studies, efforts to synthesize these two approaches have developed. These attempts have sought to combine analysis of implementation and incentive structures with an examination of local actors, their goals, values and relational dynamics. Despite recognition in the literature of the importance of context for explaining implementation processes, few authors have effectively made progress in understanding contextual variables that significantly influence policy execution. In the following section, we highlight the contributions of Matland (1995), one of the authors who have most dedicated themselves to understanding the effects of context on implementation (LOTTA *et al.*, 2021).

Enabling contexts for making different approaches operational: articulating ambiguity and conflict in public policy implementation

Based on a robust analysis of the literature on top-down and bottom-up approaches, Matland (1995) proposes a synthesis that seeks to create a new explanatory model of implementation contexts in which one or other of these two approaches is more appropriate. The author considers that researchers who follow these two traditional lines tend to study different types of policies: top-downers tend to study policies that are relatively clearer; bottom-uppers tend to study policies that have a higher degree of uncertainty. However, if implementation is understood as a continuous decision-making process, it is necessary to look at two key variables that affect decisions made by the actors involved: conflict and ambiguity.

For Matland (1995), top-downers perceive conflict as a variable that is endogenous to public policy, which can be influenced and minimized by policymakers, while bottom-uppers perceive it as something given that cannot be manipulated. According to the author, some types of conflict – whether

concerning the purpose of a policy and/or the planned means to achieve it – could indeed be circumvented by offering financial incentives that would lead key actors to adhere to the proposal. Other conflicts, however, could not be overcome in this way, because there would be significant incompatibility of values. In such cases, bargaining and coercion mechanisms would most commonly be used to ensure compliance.

Ambiguity, as a degree of uncertainty in policy, may also be related to means and ends, and may be closely related to conflict. In this case, Matland (1995) draws attention to the conflicting effects that can be generated by the typical recommendation of top-down models that the objectives and procedures of a policy should be clear, leaving little room for doubt, in order to positively influence its success. The reality of the context of policy implementation may in fact present an opposite dynamic, where conflict and ambiguity are inversely proportional. The clearer and better defined the objectives of a policy intended to generate change in a given context, the greater the odds of them leading to conflict, in the sense that actors might feel threatened in relation to the margin of action they have in their “territory” and the ability to maintain certain patterns of power at the local level. In this case, increased ambiguity could be a conflict-reducing mechanism, and the way to ensure implementation of a policy. A similar dynamic could also occur in the realm of policy formulation, considering the need for approval of the policy by different actors in the legislative branch.

With regard to the means, ambiguity may become more evident when the technology needed to achieve the objectives is lacking, or when there is little certainty about the roles that each organization should play in the implementation process. It is also possible that the context is so complex that it is difficult to recognize the instruments, their use, and their effects.

According to Matland (1995, p. 159), implementation of ambiguous policy is a fact, both in terms of its objectives and the means of achieving them. The extent to which this variable is present directly and significantly impacts the implementation process in different ways, affecting the ability to monitor activities and the likelihood of the policy being understood in the same way in the different places where it is implemented.

Matland (1995) sees the context of public policy as being marked by different degrees of conflict and ambiguity, and considers that the interdependence between these elements generates contexts that are more or less favorable to effective policy implementation. More specifically, the author proposes a matrix in which each quadrant represents an “ideal type” of implementation context, accompanied by the central principle that would determine the results in each case.

FIGURE 1 – IMPLEMENTATION CONTEXTS ACCORDING TO DEGREE OF AMBIGUITY-CONFLICT

		Conflict	
		Low	High
Ambiguity	Low	<i>Administrative Implementation Resources</i>	<i>Political Implementation Power</i>
	High	<i>Experimental Implementation Contextual conditions</i>	<i>Symbolic Implementation Strength of coalitions</i>

SOURCE: Matland (1995, p. 160).

The *administrative implementation context* is characteristic of policies that have a low degree of conflict and ambiguity. Given that there is consensus about the goals and the means of achieving them, and these means exist and are known, the main factor that determines the results is the availability of resources. In this context there is an authority that has the resources, information and ability to establish sanctions in order to make the policy operate. Information flows in a top-down direction, reaching actors who have a clear idea of what their roles are and do not present major resistance to action. In this sense, the traditional top-down approaches are good analytical keys for explaining the implementation process, the logic of which in this case is Weberian.

In the *political implementation context*, the level of ambiguity is also low, but there is great conflict over objectives and/or instruments. This conflict usually derives from earlier stages, and the main element determining “who wins” the dispute is the power of the actors, either to impose their will at different hierarchical levels or to negotiate with actors at different decision-making levels (HILL; HUPE, 2003). The implementation process is ultimately about ensuring the obedience/compliance of the actors on whose resources the policy’s success depends, therefore making coercive or remunerative mechanisms predominant. Matland (1995) considers that the new top-down models can contribute significantly to the understanding of what occurs in these contexts, since, unlike more traditional approaches, political factors are emphasized.

In the *experimental implementation context*, the degree of conflict is low because there is an overall consensus on the need for the policy, but the degree of ambiguity is high due to the actors’ uncertainties regarding its specific objectives and/or the best instruments to be adopted. In this scenario, the results depend mainly on which actors are most involved and active in each local context. As contextual conditions are the main factor influencing implementation, considerably different processes and outcomes may occur, since the set of actors involved and the pressures on them are different. In

experimental contexts, there is considerable room for innovation and for developing new capabilities, so that, from Matland's (1995) perspective, bottom-up approaches are better than top-down ones in terms of analyzing them, since the latter have little tolerance for ambiguity and emphasize elements such as control, command and standardization – which are not appropriate in experimental implementation contexts.

Finally, even though it seems unlikely that a policy will have a high level of ambiguity and conflict – since greater ambiguity can contribute to less conflict – *symbolic implementation contexts* can also occur. These are policies the symbols of which (the themes/issues to which they refer) usually produce a lot of dissent, even when the policy itself is quite open or vague. In these contexts in which the extent of the conflict is important for establishing the way in which solutions to it will be developed, the main element determining the outcomes is the strength of coalitions formed by local actors who control the available discourses. Amidst vague and abstract objectives, different interpretations are in dispute about the “right” way to translate them into actions, giving rise to competition between coalitions. Because it is eminently conflictual, symbolic implementation resembles political implementation to a certain extent, especially in terms of using coercion and bargaining mechanisms to resolve dissent. The main differential in this context is the fact that it is coalitions at the micro (local) level rather than at the macro (central) level that have the greatest influence on outcomes. In these cases, identifying the competing groups at the local level, as well as the contextual factors that affect the strengths of these groups, is central to a better understanding of their outcomes. Neither top-down nor bottom-up models are completely appropriate for describing this type of scenario.

In short, the model proposed by Matland (1995) assumes that both top-down and bottom-up approaches provide important contributions for understanding different implementation situations, and that, in certain contexts, one or other of the approaches may be more appropriate. For the author, it is the analysis of the levels of conflict and ambiguity of a policy that may enable predictions about how its implementation will develop.

In the following section, we seek to make initial use of this model in order to understand the context of the implementation of a recent educational policy, which has as one of its distinctive features the high level of conflict that has surrounded it ever since its formulation.

The *Base Nacional Comum Curricular* and its implementation context: possibilities of concept operationalization

The *Base Nacional Comum Curricular* (BNCC), approved on December 20, 2017², envisaged a structuring period between 2018 and 2019, with a view to being implemented in schools nationwide from 2020³. As it has only recently begun to be implemented, this does not allow for robust analyses of the processes undertaken and the results that have been achieved. However, it is possible to take an initial look at the implementation context, that is, at the conditions for this process and the factors that have the greatest potential to influence action at the local level.

As such, in line with Matland (1995), we believe that analysis of BNCC implementation should take into account the background of the policy, which can relate to disputes fought at times prior to its being produced (WINTER, 1985). We therefore seek to provide a brief retrospective of the legal frameworks that served as its basis, and that gave rise to previous curriculum policies, the implementation contexts of which were diverse in the face of different levels of conflict and ambiguity.

Enacted after a long period of military dictatorship, the 1988 Federal Constitution establishes education as a fundamental citizen right and a duty to be shared between the State, family and society. Article 210 of the Constitution provides for the establishment of “minimum content for elementary and high school education in order to ensure common basic education and respect for national and regional cultural and artistic values” (BRASIL, 1988, our translation). This article was to serve as one of the starting points for drafting the 1996 *Lei de Diretrizes e Bases da Educação* [Law on Education Directives and Bases] (LDB), Article 9 (Item IV) of which provides that the Federal administration shall

establish, in collaboration with the States, the Federal District and the Municipalities, competencies and directives for early childhood,

² With the exception of the part of the document that refers to High School Education, which was profoundly changed after the so-called “High School Education Reform”, which was approved approximately one year later.

³ Given the challenges brought by the severe novel coronavirus pandemic in 2020, which led to the closure of thousands of schools in the country, it is assumed that effective implementation of the BNCC will occur more significantly with effect from 2021. Analysis of this process is, however, beyond the scope of this paper.

elementary school and high school education, which will guide the curricula and their minimum content in order to ensure common basic education (BRASIL, 1996, our translation).

It is important to note, right from the outset, the multi-layered dimension (HILL; HUPE, 2003) that an educational policy responsible for providing a common base of skills and content at the national level takes on. By recognizing the need for articulation with other subnational decision-making spheres, one can infer the legitimacy of states and municipalities in the process of preparing these general guidelines, as well as in the definition of their specific curricula, not to mention the role they would take on in their implementation.

In the late 1990s, within the context of the new LDB, for the first time on a national level a set of reference documents for elementary and high school education was developed, namely the *Parâmetros Curriculares Nacionais* (PCNs). An initial important difference that can be seen between the PCNs (1997) and the BNCC is that the former were an open and non-obligatory reference, intended only to induce renewal of the curricula proposed for education systems, schools and teacher training. As indicated by the Minister of Education and Sports at the time – Paulo Renato Souza – in his message to teachers in the introduction to the PCNs, they “are open and flexible and can be adapted to the reality of each region” (BRASIL, 1997, our translation).

When we situate the time in history in which the PCNs were prepared, i.e. the post-dictatorship period, we notice an effort to avoid the policy being perceived as a top-down measure that configured a “homogeneous and imposing curriculum model”, given that:

In a democratic society, unlike what happens in authoritarian regimes, the educational process cannot be an instrument for the imposition, by the government, of a project for society and nation. Such a project must result from the democratic process itself, in its broadest dimensions, involving the contrast of different interests and the political negotiation necessary to find solutions to social conflicts (BRASIL, 1997, p. 27, our translation).

Taking Matland’s (1995) model as a reference, the PCNs can be characterized as a policy with a high degree of ambiguity (due to their “open and flexible” character) and, because of this very characteristic, a low degree of conflict.

As far as their objectives are concerned, ambiguity appears early in the introduction, according to which the general objectives of Elementary

Education (as well as those of each area of this segment) “are sufficiently broad and encompassing so as to meet local specificities” (BRASIL, 1997, p. 70, our translation). With regard to the means, it is worth noting, for example, the greater openness offered by the proposal for organizing teaching in cycles, in order to avoid excessive fragmentation and allow more flexible work.

With regard to conflict, which would tend to decrease due to the policy being highly ambiguous, it should be noted that the period of redemocratization in which the PCNs were formulated encouraged the sharing of expectations and a certain level of agreement around the need for democratic participation in different bodies, as well as the promotion of changes in the educational system in order to expand and improve the service provided by public schools. Another factor that possibly contributed to the low level of conflict over the PCNs was the National Education Council stating that they had a non-binding character, when the National Curriculum Guidelines were being drawn up (BONAMINO; MARTÍNEZ, 2002).

Although it is beyond the scope of this paper, it is important to emphasize that it is not a matter of stating that conflicts were absent during the formulation of the PCNs, especially when we take into account the tensions that grew between the Ministry of Education and the National Education Council throughout this process, as explored in detail by Bonamino and Martínez (2002). Those tensions ended up culminating precisely in the declaration that the PCNs were of an optional nature. However, in that context, unlike the context of the BNCC, it can be said that there was a considerable level of consensus regarding the need for benchmarks for Brazilian education, and the open, flexible and “ambiguous” approach adopted by the PCNs.

In this sense, the curriculum policy and its initial stages of production paved the way for an experimental context of implementation, which resulted in a diversity of programs (curricula) and practices carried out by different actors at local tiers or levels (states, municipalities and schools). Overall, it can be said that the PCNs were “widely accepted, especially with regard to Elementary Education” (TILIO, 2019, p. 7, our translation).

On the other hand, the current BNCC resulted from quite distinct processes. Following the timeline put forward at the beginning of this section with regard to the 1988 Constitution, the LDB in 1996 and the PCNs in 1997-1998, it is appropriate to mention the enactment of Law No. 13005, on June 25th 2014 (BRASIL, 2014), which regulates the National Education Plan. The Plan will remain in force until 2024 and has 20 goals and a set of strategies for improving the quality of elementary and high school education, among which four refer to the building of a common national basic curriculum (BNCC). In the midst of this new scenario of discussions about the definition of minimum content to be

accessed by all students in Brazil, to which the specificities of each region of the country would be added, dissensions considerably greater than those observed in the period of redemocratization can already be seen.

From the very outset, a significant level of conflict can be seen regarding the possibility/pertinence of any curriculum standardization policy within a scenario of great sociocultural diversity, as is the case of Brazil. In a study published by *Centro de Estudos e Pesquisas em Educação, Cultura e Ação Comunitária* [Center for Studies and Research in Education, Culture and Community Action] (CENPEC) in 2015, the year in which the formulation of the first version of the BNCC was underway, lack of consensus could be seen between actors linked to the field of education (basic and higher education managers and teachers, trade unionists and sectors of civil society, for example) in relation to what curriculum and basic curriculum were understood to mean, in addition to a continuum between opinions absolutely in favor or against a certain standardization of content in Brazil. Positions closer to those in favor were found mainly among agents linked to civil society organizations, education managers and some primary and secondary education teachers. The majority of contrary positions, on the other hand, were more present in the academic field (higher education teachers and researchers, members of course evaluation commissions, etc.) and scientific and trade union entities, such as the National Confederation of Education Workers.

As Cossentin (2017) points out, on the one hand, the proposal tends to be seen positively by those who emphasize the universality of education and the right to it as a guarantee of access to equality and social inclusion. In this sense, an important role is attributed to school in terms of reducing social inequalities as a republican and democratic institution. On the other hand, the proposal tends to be considered harmful to the guarantee of the right to difference and inconsistent with the educational reality of the country, marked by local contingencies and wide cultural diversity. One of the main arguments supporting the positions contrary to the proposal – markedly more expressive, as pointed out by the author – is the risk of this diversity being sacrificed in favor of a standardization that is inconsistent with the reality of the different implementation contexts, contributing to worsening inequalities that already exist. For Sússekind (2014), for example, national standardization of contents generates an “abyssal line” in relation to the curricula as they are understood and practiced in schools, so that they are placed in a position of invisibility, besides promoting a form of state control that is harmful to the guarantee of teachers’ autonomy, this being a point also raised by other actors opposed to the policy, such the education workers’ trade unions.

The conflicts surrounding the discussions about the BNCC right from when they were being prepared were also aggravated by two factors. One was the high normativity (or low ambiguity) established by the policy – especially in the elementary school segment – which, unlike what happened with the PCNs or the previous Guidelines, establishes learning expectations, competencies and specific skills for each subject and area of knowledge, accompanied by a selection of content that should be taught in each grade. In addition, and perhaps most importantly, the conflict over the proposal has been made worse by the questioning of the legitimacy of its formulators and the authoritarian (“top-down”) manner in which the curriculum reform is being conducted.

Whereas there was some participation of the population in drafting the two preliminary versions of the BNCC, through contributions gathered on an online platform, the preparation of the third (and final) version underwent relevant changes, such as the very introduction of the terms *competencies* and *skills* to replace the terms *learning objectives* and *learning rights* used in the first and second versions of the BNCC. Moreover, these changes occurred after an extremely troubled process of the removal from office of an elected president and her replacement by a vice-president with low democratic legitimacy. Following that, the coalitions of actors that gained prominence in the process of (re)writing the document under the new government were also the target of criticism. Some of these actors are part of the so-called “business reformers of education” (FREITAS, 2014) and the “new philanthropy” linked to the education sector (AVELAR; BALL, 2019) – companies, foundations and private institutes that often perceive Elementary and High School Education as a potentially lucrative market, and whose articulations in favor of the BNCC have been seen since the beginning of the debates on the policy, having gained growing protagonism in its production since then (COSTA, 2018). Despite the deep controversies raised, these new actors had enough strength to ensure the approval and ratification of the final version of the document in December 2017.

The brief explanation of the path taken above suggests that BNCC implementation will possibly be characterized by a political context as per the model put forward by Matland (1995). As discussed, the scenario that presents itself is one of a markedly conflictive policy in relation to means and ends, from the initial stages of its production, and which is hardly ambiguous in its final format, thus contributing to the worsening of the conflict. The *power* factor therefore tends to be a key element in defining “who wins” the disputes about the proposal. In this scenario, as the author points out, the implementation process revolves around efforts to ensure the agreement of those who have the resources to put the policy into practice, since, in the face of opposing views and values, such agreement cannot be taken for granted.

Based on an analysis of new top-down models, one possibility for future studies would be, for example, to map the coercive and/or remunerative mechanisms that the central level has been promoting in an attempt to ensure the reformulation of state and municipal curricula, or of school political-pedagogical projects in order to align them with the policy, and what results are produced. Another possible locus of investigation are the strategies that are being traced in search of support (popular and/or relevant partners), as well as the selection of agencies sympathetic to the proposal to participate in coordinating the implementation of the policy. In this sense, the role taken on by publishers, institutes and philanthropic foundations, for example, is worth highlighting with regard to the production of teaching material and the dissemination/promotion of the policy, as well as conceptual alignments and methodological guidelines, in addition to teacher training.

Although the context of BNCC implementation is being “typified” as political in this paper, nothing prevents empirical research from choosing as its focus of analysis the so-called “street level bureaucrats” and their forms of receptivity and (re)action in relation to the proposal. As a matter of fact, it can be said that the formulators themselves and the agencies interested in the implementation of the policy are aware that, although there are explicitly defined objectives and instruments, the essential resources are in the hands of the actors on whom its effective success depends, and who may oppose the official proposal. The two excerpts below – taken from the BNCC Implementation Guide and from a pedagogical reference material for managers and teachers prepared by the *Moderna* publishing company – illustrate this situation:

Informing all those involved, especially **teachers**, is **fundamental for successful implementation**. This strategy gives legitimacy to the process and the outcome, avoids resistance and supports teachers in public and private schools in putting the new curriculum document into practice in the classroom (BRASIL, 2020, p. 18, our emphasis, our translation).

It will be necessary to articulate states and municipalities, public administrators, school principals, specialists, training programs, produce educational materials, but it will be especially necessary to **mobilize the key Education worker: the teacher**. If educators do not buy into the challenge, the BNCC runs the risk of being ignored, becoming an impoverished roadmap for education and moving away from its central purpose: promoting equal opportunities, ensuring the right to learning (EDITORIA MODERNA, 2018, p. 18, our emphasis, our translation).

Finally, it should be remembered that there is always the possibility of a given policy being “shifted” from one quadrant to another, based on Matland’s (1995) model. In the case of the BNCC, for example, if the coalition of forces that seeks to ensure the implementation of its (conflicting) regulations weaken and if there is a reduction in the resources available for this purpose, it is possible that there will be a context of symbolic implementation, resulting in few changes at local levels. In this sense, it is important to remember the author’s own considerations in this regard (MATLAND, 1995, p. 164-165): in the legislative realm of policy approval, a coalition usually consists of actors whose support is transitory, based on exchanges of favors or political pressure. However, many of them have little actual interest in its implementation, which may end up not happening in practice. Taking this same line of thought, a further possibility for analysis appears (among the many that exist) related to how the transition from one government to another has impacted support for the main program formulated to support the implementation of the BNCC (the *Programa de Apoio à Implementação da Base Nacional Comum Curricular – Pro-BNCC*) through the transfer, or otherwise, of resources. A situation of resource contingency⁴ could, for example, contribute to the shift from political to symbolic implementation.

Final considerations

This article sought first and foremost to return to the origin of implementation studies and to trace their initial trajectory, in an attempt to understand how implementation became a central concern of public policy studies and ceased to be understood as mere execution. Through recourse to contributions initially concentrated in the fields of political science and organizational studies – which have been increasingly acquiring a multi-/interdisciplinary character through the articulation of different theoretical viewpoints – we highlight that the initial motivations for studying implementation had a normative character. In other words, the aim was to understand which factors lead to policy *failures*, in order to eliminate them and, thus, ensure the achievement of the stipulated objectives.

We then explore two of the main approaches that marked the beginning of studies developed to analyze these processes: the top-down approach, with

⁴ An example can be found in the story published in the Folha de São Paulo (SALDANHA, 2019) newspaper, about resources not being transferred by the federal government to the state governments, to assist in the design of new curricula and teaching training.

a clear focus on the policymaking process, and the bottom-up approach, which takes as its main focus the actors on the frontline of public services, also known as “street-level bureaucrats” (LIPSKY, 1980). Following a long period of dispute between these two analytical perspectives, in which both their limits and potentials were emphasized, synthesis models began to emerge, in an attempt to combine elements of both approaches or to present situations in which each one would be more appropriate. Among them we highlight Matland’s (1995) model, which seeks to articulate two variables commonly present in the policy production process – ambiguity and conflict – in order to identify the different implementation contexts that are generated from their articulation, to a greater or lesser degree.

Finally, we sought to undertake a brief analysis of the context of the implementation of the *Base Nacional Comum Curricular* taking as reference the model developed by Matland (1995). In this process, we sought to make a comparison of the scenario that has been emerged since the initial stages of BNCC production with analogous processes that occurred with the PCNs, an important previous curriculum policy, the implementation context of which proved to be different from the current one.

Although a detailed systematization of the trajectory of implementation studies is beyond the scope of this paper, it is fundamental to point out that studies developed in the last two decades transcend the top-down and bottom-up dichotomy, surpassing even synthesis efforts that remain tied to this binary division. In what is usually called the “fourth generation of studies” (LOTTA, 2019), the main debates on implementation explore elements such as multi-level governance – the vertical and horizontal flows of interaction between state and non-state actors (HILL; HUPE, 2003) – characteristic of a context of reforms and redefinition of the role of the State, in which private sector or third sector actors are increasingly present in the decision-making arenas of public policies.

These models also have important analytical potential for research into implementation of the BNCC in the states and municipalities. As explored in the previous section, the policy production process, especially after 2016, has been marked by the prominence of these non-state actors (institutes, foundations, publishers and other companies linked to the education sector), which have further expanded their power of influence over actions to induce the implementation of curriculum reform, due to the low level of coordination of this process among the federative units by the federal government. As such, it is practically impossible to understand the complexity of this process – and the conflicts that result from it – by referring only to the two antagonistic approaches that inaugurated implementation studies. In this sense, we also sought to present, in the previous section, some possibilities for future studies that can be outlined

from a better understanding of the context that is presented for implementation (political, or even symbolic) – the main objective of this study.

Recognizing the preliminary nature of these considerations and the impossibility of delving more deeply into a still incipient process, we have sought to shed light on possible contributions from the literature on public policy implementation for the analysis of educational policies, which commonly present a significant degree of conflict.

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