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Transparency, Probity and Accountability: An Assessment of the Effectiveness of Treasury Single Account (TSA) in Nigerian Public Sector

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Abstract:

This study focuses on the effectiveness of Treasury Single Account (TSA) for promoting transparency, integrity, and responsibility among public sectors in Nigeria. A TSA is an important tool for managing government activities. It is very useful for the optimal utilization of government cash resources. Relying on secondary data, we concluded that the adoption of TSA by the federal government is a good measure aimed at plugging loopholes in the Nigerian Financial System as against the former fragmented government banking arrangements where separate cash transactions by each MDA were allowed for (supposed) smooth control and reporting purposes. However, this resulted to numerous corrupt practices such as lack of transparency and accountability, Revenue leakages, incrementalism and other sharp practices that were overarching in the Country's public accounting system. The paper finally discusses the prospects of the TSA system and its challenges and concludes that the system requires political will, honesty and determination so as to overcome the various challenges identified in the paper in order to achieve the expected benefits of the system. Therefore, our recommendations centres on the urgent need for political will as well as strict compliance with the directive on TSA by the relevant government organisations.

Keywords: Treasury Single Account, Revenue leakages, Corruption, Transparency, Accountability & Nigerian Financial System

1. Introduction

In Nigeria, Treasury Single Account (TSA) is an important tool to manage all the operations of governments smoothly. Previously (before the order of August 11th, 2015) a unified view was completely absent among government financial resources. For this reason, cash lies idle for extended periods in numerous bank accounts which are held by spending agencies. These agencies were fraudulently diverting government funds. So many revenue generating MDAs were defrauding the nation's commonwealth. Government ineffective control over its cash resources then started paying for its institutional deficiencies in multiple ways. For example, this lacuna has made it possible for revenue generating MDAs to have generated about N3 trillion in 2009, but only remitted less than N47 billion to government coffers; generated N3.07 trillion in 2010 but remitted less than N55 billion; and generated more than N3.17 trillion in 2011 and just remitted a meagre N73.80 billion (Okwe, Nelson, Adeoye, & Ogah, 2015:53). As per the Nigerian public financial management policy agenda, Nigeria has put priority in case (Braitham, 2016).

The background of Treasury Single Account (TSA) is in accordance with Executive Order No. 55 of 2011, which stipulated that the Bureau of Treasury shall operate a Treasury Single Account (TSA) to receive remittance of collections of internal revenue taxes/customs duties from Bureau of Internal Revenue (BIR)/Bureau of Customs (BOC) authorized agents, banks as well as other National Government Agencies from authorized government depository banks (Isa, 2016).

To further buttressing the above point, Sections 80 and 162 of the 1999 Constitution are apt on this matter when it says:

'All revenues or other moneys raised or received by the Federation (not being revenues or other moneys payable under this Constitution or any Act of the National Assembly into any other Public Fund of the Federation established for a specific purpose, shall be paid into and form one Consolidated Revenue Fund of the Federation (Section 80 (1), 1999 Constitution FRN).'

Also, Section 162 (1) says that:

'The Federation shall maintain a special account to be called 'The Federation Account' into which shall be paid all revenues collected by the Government of the Federation'.

In line with this determination to ensure discipline, accountability, probity and greater transparency in the management of the nation's finances, President Muhammadu Buhari directed all Ministries, Departments and Agencies (MDAs) of government to henceforth pay their earnings into a unified bank account known as Treasury Single Account (TSA). This directive applies to the MDAs that are funded from the Federation Account such as Nigerian National Petroleum Corporation (NNPC), the Central Bank of Nigeria (CBN), the Securities and Exchange Commission (SEC), the Nigerian Ports Authority (NPA), the Customs Service (NCS), Nigeria Immigration Service (NIS), Federal Inland Revenue Service (FIRS) and a host of others. The MDAs are to pay all their revenues to a sub-account linked to the TSA at CBN. The order on TSA, which came into effect on August 11th, 2015, marks the beginning of MDAs' retirement of revenues due to the Federal Government into a unified account maintained by the Central Bank of Nigeria (CBN).

Therefore, this paper does the assessment of how effective is TSA at engendering transparency, probity and accountability in Nigerian public financial management. The paper contextualised transparency, accountability and probity while its legal framework was discussed. Meanwhile, the institutional/structural and operational model was also presented. The paper considered the use of TSA as an effective tool to foster transparency, accountability and probity in public financial management (PFM). Finally, the paper discusses problems and potential benefits of TSA for financial prudence and proposes some recommendations in order to overcome implementation challenges.

2. Conceptual Analysis

2.1. Treasury Single Account

The Treasury Single Account connotes a single pool for harvesting revenue inflows of MDAs. Mba (2015) view 'TSA' from a contemporary socio-politico-macro-economic and accounting approach when he describes it 'as a system of Aggregative Financial Inclusion, being a nationally organized and particular way of connecting all and divergent federating units on 3-by-3 matrix, Federal – State – Local governments and their respective Ministries, Departments and Agencies (MDAs), to account for all their incomes and revenues via TSA Designated bank accounts with Deposit Money Banks (DMBs) and channelling and consolidating same to Consolidating Single Account with Central Bank of Nigeria'. Pattanayak & Fainboim (2010) stated TSA as a unified structure of government bank accounts that gives a consolidated view of government cash resources. In contextualizing TSA, scholars have put forward different views. Some scholars oppose that TSA was not Buhari's idea (Eme & Chukwurah, 2015). To be sure, they further argue that former President Goodluck Jonathan had set a February 2015 deadline for the implementation of the initiative, but did not go ahead with it. There were other scholars who believe that TSA policy was first recommended by the Federal Government's Economic Reform and Governance Programme in 2004, with a cardinal objective '*to significantly strengthen governance and accountability, reduce corruption and deliver services more effectively*' but was dumped in 2005, following intense pressure from the banking industry during the tenure of former President Olusugun Obasanjo. The reform encompasses amongst others, the installation of an ICT solution for PFM called Government Integrated Financial Management Information System (GIFMIS) (Zubairu, 2015).

But they both agree that bankers had forced the previous administrations: government of Olusegun Obasanjo (Okwe, et.al, 2015:53).

2.2. Transparency, Accountability and Probity

Transparency, accountability and probity need each other and can be mutually reinforcing. Together they enable citizens to have a say about issues that matter to them and a chance to influence decision-making and hold those making decisions to account. Each concept is part of a strategy used for and by citizens to have the means, resources and opportunities to influence decision-making and affect development outcomes.

2.2.1. Transparency

There are several meanings for transparency given by scholars and organizations; it is sometimes considered as a dimension of accountability; thus, we can confidently say that transparency has been a source of much controversy (Mabillard & Zumofen, 2017). For example, the Asian Development Bank cited in Hood (2006: 4) defines 'transparency' as referring to 'the availability of information to the general public and clarity about government rules, regulations and decisions'. Transparency is also defined as reliable, relevant and timely information about the activities of government is available to the public (Kondo 2002). Bertók et al. (2002) define transparency as 'openness about policy intention, formulation and implementation'. However, for the word 'openness', there are two groups of thought about this word. Some scholars argue that this word is close to transparency, while others think the two words are different (Heald, 2006). The meaning of transparency in the context of corporate governance is likely to be understood as 'disclosure in the language of accounting' (Hood, 2006). Economists believe that if policies are transparent they are more likely to be rational than if they are opaque (Hood 2006).

Transparency International (quoted in Transparency-Accountability Initiative, 2016) observes that 'transparency' is a characteristic of governments, companies, organizations and individuals that are open in the clear disclosure of information, rules, plans, processes and actions. As a principle, public officials, civil servants, managers and directors of companies and organizations and board of trustees have a duty to act visibly, predictably and understandably to promote participation and accountability. Simply making information available is not sufficient to achieve transparency. Large

amounts of raw information in the public domain may breed opacity rather than transparency. Therefore, information should be managed and published so that it is: relevant and accessible as well as timely and accurate. Both accountability and transparency are key elements of good governance (Bertók et al., 2002). Transparency between the accouter and accountee is also important for accountability. Gaining popularity through a normative prism, transparency is now increasingly justified by the results it is supposed to produce – increased trust, reduced corruption, etc. (Etzioni, 2010).

2.2.2. Accountability

The notion of accountability is an amorphous concept that is difficult to define in precise terms. Roger and Mac-Williams (2001) observe that accountability is said to have Roman origin denoting 'to stand forth and be counted'. Other scholars claim that the term 'accountability' originally is derived from Latin word 'acomptare' which means to account, and it has often been used synonymously with other concepts as 'answerability', 'enforcement', 'responsibility', 'blameworthiness', and 'liability' (Murtala, 2012). Blind (2011:8) also argues that 'accountability as a concept, has a dualistic nature'. According to him, 'accountability is abstract and value-ridden because it is associated with inter alia, the notions of responsibility, integrity, democracy, fairness and justice'. But notwithstanding the duplicity, all the terms used in connection with the concept are associated with one common meaning-obligation and expectation of account-giving.

Accountability may look and function very differently across political systems, but it is always important because it underpins the allocation and use of power. Poverty persists in large part because poor people are disempowered and unable to hold government to account. The information and mechanisms to claim their rights and seek redress are weak. Accountability means ensuring that officials in public, private and voluntary sector organizations are answerable for their actions and that there is redress when duties and commitments are not met.

DFID (2008) states that accountability is an institutionalized (i.e., regular, established, accepted) relationship between different actors. One set of people/organizations are held to account ('accountees'), and another set do the holding ('accounters'). There are many ways in which people and organizations might be held to account. It is useful to think of an accountability relationship as having up to four stages: standard setting, investigation, answerability, and sanction (DFID, 2008).

2.2.3. Probity

Probity stands for integrity, uprightness and honesty. It provides evidences of ethical behavior. Probity helps to ensure processes, practices and behaviour that enhance and promote public sector values and interests (Queensland Crime and Misconduct Commission, 2006).

3. Legal and Constitutional Framework of TSA

Acts Instituted by Government to Strengthen Treasury Single Account (TSA) in Nigeria are:

- The Constitution of Federal Republic of Nigeria, 1999 (as amended): Like we mentioned above, Section 162(1) of the 1999 Constitution requires that the Federal Government: maintain a special account which should be called 'The Federation Account' into which shall be paid all revenues collected by the Government of the Federation.
- Fiscal Responsibility Act (2007): Fiscal Responsibility Act 2007 is another legal plank to the Treasury Single Account. This is an economic tool designed to enhance fiscal prudence by placing statutory obligations on federal, state and local governments to commit to transparent fiscal, budget practices and economic objectives that can be evaluated overtime (Alok, 2007). Sections 21 and 22, thereof, are germane to this article. For instance, Section 21 of the Act requires government corporations and MDAs to prepare an annual estimate of revenue and expenditure and submit same to the respective minister who shall forward same to the President for inclusion into the Appropriation Bill for onward transmission to the National Assembly. The intendments are that no money shall be expended out of the Consolidated Revenue Fund without appropriation into the Appropriation Act. Also, Section 22(2) the Act requires that the balance of the operating surplus of government corporations shall be paid into the Consolidated Revenue Fund of the Federal Government not later than one month following the statutory deadline for publishing each corporation's account. This is to disallow the withholding of government monies by the corporation (Amadi & Obutte, 2018).
- Also, Section 3 of the Finance (Control and Management) Act, charges the Finance Minister to be responsible for the management of the Consolidated Revenue Fund. Equally, Section 5 provides that the management of the Consolidated Revenue Fund should be conducted in accordance with the financial provisions of the Constitution and the Finance (Control and Management) Act. Also, Section 16 of the Act requires that any money not expended by MDAs at the expiration of the financial year should accrue or be returned to the Consolidated Revenue Fund.
- One other imperative legal framework for the TSA is the Allocation of Revenue Act (Federation Account, etc.). Section 10 of this Act states that 'Federation Account' means the Federation Account established under section 162 (1) of the 1999 Constitution as amended in 2011. Section one recognizes the Federation Account and provides how the amount standing to the credit of the Federation Account, less the sum equivalent to 13% of the revenue accruing to the Federation Account directly from any natural resources as a first line charge for distribution to the beneficiaries, that is, the Federal, States and local governments.
- A CBN circular no. BPS/CSO/CON/DIR/01/079. Dated: February 25, 2015, and addressed to all Deposit Money Banks (DMB).
- CBN Guidelines for Compliance with Treasury Single Account by Banks in Nigeria, 2015.

- Federal Government's Economic Reform and Governance Programme of 2004: This led to the effect that all the capital accounts of MDAs at CBN were transferred into centralised account called Central Capital Account (CCA). The OAGF operated the CCA on behalf of MDAs and therefore responsible for MDA payments for contracts executed for which due process certificates for payment were received. In fact, under this programme, the Integrated Payroll and Personnel Information System (IPPIS) commenced with seven (7) pilot MDAs that centralised salary payments of Civil Servants from CRF was introduced and release of personnel costs to the affected MDAs through DMBs seized in 2007. As at August 2015, 388 MDAs with staff count of 285,468 and gross monthly payment of N34bn were electronically paid from the CBN account by the OAGF (Zubairu, 2015).

TSA is a Systemic Approach that is affecting and connecting the whole Nigeria State, and requiring a common Directive Principle (See Chapter 2, 1999 Constitution of Federal Republic of Nigeria). Section 13, Chapter 2, of the 1999 Constitution of The Federal Republic of Nigeria (as amended), says:

'It shall be the duty and responsibility of all organs of government, and of all authorities and persons, exercising legislative, executive or judicial powers, to conform to, observe and apply the provisions of this chapter of this Constitution'.

Furthermore, it should be noted that TSA is also an integral Part of GIFMIS/ERGP, the installation of an ICT solution for Public Financial Management called Government Integrated Financial Management Information System (GIFMIS). In that, a Federal Government of Nigeria Treasury Circular, No. OAGF/CAD/026/V.1/253, issued and authorized by the Accountant-General of the Federation on 19th March, 2015, on Introduction of e-Collection of Government Receipts, emphasized that TSA must run on e-Receipt basis.

'Further to Federal Treasury Circular Reference No. TRY/A6 & B6/2012 of 4th July, 2012 on the Guidelines for Implementation of Government Integrated Financial Management Information System (GIFMIS), it has become imperative to issue this additional instruction on e-Collection (para.1 of the OAGF circular).

Finally, with effect from 15th September, 2015, all payments due to the Federal Government or any of her agencies are to be paid in to the Consolidated Revenue Fund (CRF) or Designated accounts in the Central Bank of Nigeria (CBN) through Deposit Money Banks (DMBs) or electronic channels using the CBN Payment Gateways. This is in line with the operations of the Treasury Single Account (TSA) and the e-Payment policies of the Federal Government (Mba, 2015).

4. Adoption and Implementation of TSA by Some Other African Countries

Quite a time ahead, a couple of African countries have started practicing the adoption of similar policy with the aim of promoting a culture of probity. Also much like Nigeria, Kenya adopted the TSA policy in reaction to the loss of billions of dollars in the public system (Brammah, 2016).

4.1. TSA Model for Revenue Collection in Nigeria

The central bank of Nigeria acts as the fiscal agent of the government, so the custody of the TSA in Nigeria is with the central bank, although in theory, the main account of a TSA system may also be held at a commercial bank. In fact, there is no realistic alternative for economies without a well-developed commercial banking system. In practice, the government banking arrangements may consist of several bank accounts which can be at both the central bank and commercial banks. However, the balances in commercial banks should be cleared every day and all government cash balances should be consolidated in one central account—the TSA main account—of the treasury at the central bank. Figure 1 below describes a simple revenue model in operation in Nigeria. The taxpayer makes the payment to a transit account in a commercial bank. The funds are automatically remitted to the TSA in the central bank at regular intervals (for instance, at the end of the business day or at more frequent intervals if an RTGS is used). Each day the bank submits an account statement to the tax authority and to the treasury, which is used for reconciliations against taxpayer records (tax authority) and the TSA (MoF/treasury). As mentioned above, an RTGS could enable within-the-day transfers from taxpayers' accounts to the TSA, via commercial bank accounts.

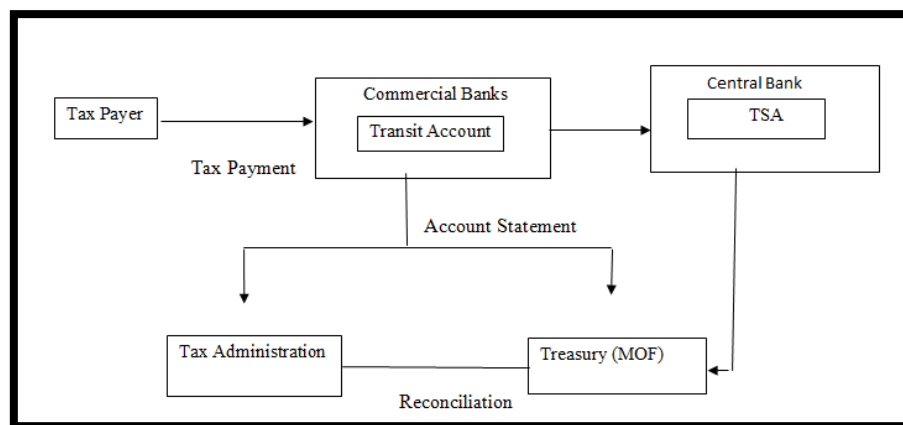


Figure 1: TSA Model for Revenue Collection in Nigeria
Source: Adapted From Pattanayak & Fainboim (2010).

In Nigeria, commercial banks are used for revenue collection purposes on a remuneration basis and in accordance with International best practice these banks are mandated to transfer revenues collected to the TSA main account on the same day (eliminating one of the sources of float as the Commercial banks before TSA used to use the free float to invest in interest-bearing securities). Now these banks are rather remunerated on a fee-for-service, based on the number of transactions that have been processed. The fee is usually established through a competitive bidding process.

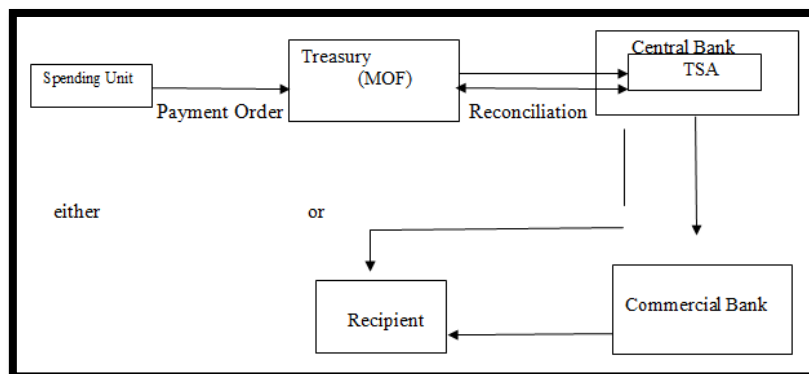


Figure 2: TSA Model for Payment Disbursement in Nigeria
Source: Adapted From Pattanayak & Fainboim (2010)

A procedure for centralized payments by the treasury is described in figure 2 above. The spending units submit payment requests (payment order (PO)) to the treasury, which checks them against the authorized limits and processes them for payment from the TSA through one of the interbank payment systems. The funds are deposited in the recipient's account in a commercial bank.

Under this model, requests for payments are prepared by individual budget agencies and sent to a central treasury payment unit for control and execution. The central payment unit manages the float of outstanding invoices. This model may create a useful synergy between cash management on the one hand, and expenditure control and transaction accounting on the other hand.

Although in this model the payment and accounting functions are centralized, individual spending agencies are treated as distinct accounting entities through a treasury ledger system. Therefore, information on the individual ledger accounts of the spending agencies (including information on their respective transactions) is maintained and controlled internally by the treasury and thus not visible to the banking system. Under this model, only the treasury central unit deals with the commercial banks, making payments from the TSA and receiving collected revenues into the TSA.

The central unit processes and records all inflows and outflows and cash balances to the appropriate ledger account. However, some part of budgetary accounting could still be the responsibility of the respective spending agencies (particularly when commitment control is decentralized) and, therefore, clear procedures should be in place to harmonize (and reconcile) the accounts maintained both by individual spending agencies and the central payment unit.

5. Effectiveness of TSA for Fostering Transparency, Accountability and Probity in Public Financial Management

The concept of accountability in the public sector organizations is premised on the fact that public servants and office holders hold their positions and everything connected thereto as trusts for the people (the true and general public) who are expectedly their masters, and they must render proper accurate and timely accounts of successes or failures to the public. Transparency is therefore very cardinal to accountability and it stands to good reasoning that all forms of secrecy and shady dealings detract from effective and proper practice of accountability. Accountability can be classified into: financial; administrative, political and social. But here, we are concerned with finance. Financial accountability translates to obligation on the part of an official handling resources, public office or other positions of trust to report on the intended and actual use of the resources. This calls for transparent processes and procedures to attain it (Ibietan, 2013).

The old style was a financial management system that allows government agencies to operate more than 17,000 poorly monitored bank accounts. Such systems allow for financial recklessness to fester and permit a lack of accountability to go unchecked. But in a critical era like now when Nigeria clamour for transparency, probity and accountability in government financial dealings, TSA should be seen as a good instrument and an effective alternative (Braitham, 2016).

Transparency, as we noted earlier, is 'the availability of information to the general public and clarity about government rules, regulations and decisions', but when the center has hands that are not clean, they don't have the moral authority to give instructions to other people. However, the full implementation of TSA is a strong political will from the presidency to curb the excesses of these unscrupulous individuals (Eme & Chukuwurah, 2015). Besides, TSA is a technological driven system and by that, technological advancement has played an important role in changing governments' banking practices over recent times. According to Larson & Corinne (2007) 'the banking industry has created new products that allow depositors' access to real-time account balance information and the ability to move funds electronically'. Check processing has been accelerated, and electronic payment systems expanded; the availability of electronic banking networks at commercial banks allows for very effective, virtually cost-free sweeping of balances on a daily basis.

TSA engenders relative improvement on the budget performance monitoring and evaluation which on the other hand depends on the openness of government agencies. However, the budget performance monitoring and evaluation reporting in Nigeria is exclusively on resource input and makes no attempt to assess the output and outcome of resource utilization, let alone the impact of the expenditures. But TSA has moved forward the process of Budget Performance Monitoring and Evaluation to include value for money assessment and specific outcomes with respect to progress being made for the achievement of common welfare.

TSA is principally a cash management tool for efficient management of the Government's cash position. Prior to the implementation of TSA, government was incurring finance cost on debit balances in some MDA's accounts while it was earning close to nothing on the credit balances of other MDAs. With the TSA, the net balances on all the MDA accounts will now reside with the Central Bank; hence, the government will avoid incurring interest costs when it has positive net position (Eme & Chukwurah, 2015).

More also, TSA streamlines the numerous bank accounts operated by various MDAs as it is not reasonable that the federal government's money be kept with banks by MDAs while the federal government goes to borrow money to finance budget deficit from banks and other sources. 'This is quite absurd' (Otunla, AGF quoted in Vanguard Editorial, 2015:18). In October 2013, former minister of finance Ngozi Okonjo-Iweala explained that the introduction of TSA had helped to reduce how government account was being overdrawn. She said, '93 MDAs had hooked on to the TSA platform while government's overdrawn position has dropped from N102 billion in 2011 to N19 billion in 2012' (Vanguard Editorial, 2015:18).

TSA can also provide some level of transparency around unspent budgetary allocation which can be carried forward to another year (Oyedele, 2015).

6. Benefits

TSA is capable of blocking the loop holes and revenue leakages. For example, the case of NNPC and its subsidiaries, which, having internally generated N6.132 trillion between 2009 and 2011 remitted zero naira to the government treasury (Okwe, et.al, 2015:53) can now actually be prevented. CBN, (2015) reasoned in the same direction and said that the implementation of TSA will enable the Ministry of Finance to monitor fund flow as no agency of government is allowed to maintain any operational bank account outside the oversight of the ministry of finance.

The TSA provides a number of other benefits and thereby enhances the overall effectiveness of a public financial management (PFM) system. The establishment of a TSA should, therefore, receive priority in any PFM reform agenda. According to Akande (2015), all receipts due to the Federal Government or any of its agencies must be paid into TSA, except otherwise expressly approved.

7. Problems and Issues Arising from Full Implementation of TSA in Nigeria

The centralization of expenditure transaction processing can lead to inefficiencies, including high transaction costs, and potential for corruption especially if the control systems are inadequate. Another issue that needs to be considered is whether the authorization of commitments is centralized or decentralized to individual spending agencies. In the latter case, if the commitment control and payment systems are not well integrated (i.e., if commitments are entered into by spending agencies well beyond the authorized cash profile that serves as the basis to process payments when the commitments mature), payment arrears may occur. Furthermore, TSA has been so much criticised on the ground that it has consequentially resulted to job losses by individuals, low deposits threshold by banks, lack of autonomy for MDAs and restriction of access to funds (Braithair, 2016).

TSA has also been blamed for lack of autonomy for special agencies and academic institutions. Universities have complained of about highly centralized and control system of TSA which translate to delay and even many occasions restriction of access to funds meant for the execution of developmental projects.

Moreover, TSA is better implemented where there is technological advancement but considering the fact that Nigeria is still a developing country, so poor technological infrastructure is sometimes an obstacle to combining consolidation of cash balances with payment processing. Nigeria with an underdeveloped technological infrastructure, daily clearing of accounts with various banks could be more difficult than daily settlement within a set of accounts at the central bank. Maintaining a large number of accounts at commercial banks could also hinder the implementation of appropriate clearing and consolidation procedures (Pattanayak & Fainboim, 2010).

Legal constrains have created a lot of problem for the TSA implementation. While Section 162 of the 1999 Constitution regarding maintenance of Federation Account provides a broad legal framework it does not address the operational details.

8. Conclusion

There can never be accountability where there is no transparency and 'where there is no accountability, development will inevitably be stunted' (Adegbite, 2009:33). In the recent past, Nigeria operated fragmented government banking arrangements that hinder effective cash management and control over public funds. It is common in Nigeria to find multiple bank accounts in commercial banks belonging to different MDAs, with idle cash sitting there for no reason at all. This has a lot of implications for development generally in Nigeria. Thus, the sudden Interest in Treasury Single Account (TSA) is motivated by the need to curb waste occasioned by ineffective control of public funds and collusion between the top bureaucratic and political class in rent-seeking and sundry corrupt practices. The need for effective control and management of the meagre resources in the face of rising expectations from the populace for service delivery

calls for proper accountability in the public sector. The test parametre for measuring an accountable government lies in the extent to which it can tolerate corruption or how far it would go in fighting corruption. This explains the consequential directive by President Muhammadu Buhari to MDAs to comply with full implementation of TSA.

The primary objective of a TSA is to ensure effective aggregate control over government cash balances. The consolidation of cash resources through a TSA arrangement is meant to optimize government cash management. It avoids borrowing and paying additional interest charges to finance the expenditures of some agencies while other agencies keep idle balances in their bank accounts. Effective aggregate control of cash is also a key element in monetary and budget management. Other objectives of a TSA include: reliable and efficient budget execution by minimizing transaction costs; monitoring (and thereby controlling the delay in) the remittance of government revenues (both tax and nontax) by the collecting banks; effective reconciliation between banking and accounting data; efficient control and monitoring of funds allocated to various government agencies; and facilitating better coordination with the monetary policy implementation.

9. Recommendations

From the various observations made above, the following recommendations are put forward:

- Mutual cooperation between the National Assembly and the Executive arm to ensure strict compliance by the MDAs.
- CBN, should also be proactive and institute measures to correct any lapses or negative impact of the TSA policy.
- All the stakeholders need to ensure that workers that lose their jobs owing to the new policy should be compensated appropriately.

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