

Germany and France face the North American Concept of Management Control Systems: Some insights for research

**Submitted by
Henri Bouquin and Rainer Schwarz**

Abstract

Corporate Governance and Management Control Systems are two research fields that are concerned to a certain degree with the same problems. Yet the literature in both fields takes rarely notice of each other and the relationship between them. In this paper we argue that Corporate Governance is supported by Management Control Systems. In order to understand their relationship we take a historical perspective. We compare the evolution of Management Control in Germany and France and relate it to the North American concept. We also stress the concept of community that influenced historically in Germany and France both Corporate Governance and Management Control. Finally, we look into the professionalisation of the management control function. As a conclusion, we propose further research into the path dependency of the interrelationship between Corporate Governance and Management Control Systems.

I. Introduction

Corporate Governance and Management Control Systems (MCS) are two research fields that are concerned to a certain degree with the same problems. For example, the DuPont system of financial control is widely regarded as a prototype of MCS. It served performance measurement and decision making for divisions and subsidiaries, i.e., remote control of them. Management Control is often concerned with responsibility centers. Corporate Governance is also concerned with the control of subsidiaries. Yet the literature in both fields takes rarely notice of each other and the relationship between Corporate Governance and MCS. The

management control literature started together with the management theorists (Taylor, Church, Fayol and others) at the beginning of the 19th century. They saw control as an important function of management. Management science itself developed with the large corporations. However, control was mainly the management control of activities, cash flows, people, organisational units and managers itself.¹ The Corporate Governance literature is rather a child of the last decades. At least it took a remarkable upswing with the last accounting scandals and the resulting Sarbanes-Oxley Act of 2002. However, a deeper understanding of both Corporate Governance and MCS is missing. This mutual understanding depends on a clear definition of both fields.

Gourevitch and; Shinn (2005, 1, 3) say that Corporate Governance "...is the structure of power within each firm that determines who allocates money...- the authority structure of a firm-...". It is shaped politically by law, in the U.S. from the Sherman Antitrust Act 1890 up to the Sarbanes-Oxley Act of 2002. On page 5 this authors describe that authority structure as supervision of managers by shareholders. There are other definitions. Sometimes even the word "shareholder" is not used. For example, two German authors describe Corporate Governance as "a more-or-less country-specific framework of legal, institutional and cultural factors shaping the patterns of influence that stakeholders exert on managerial decision making" (Weimer, J.;Pape, J., 1999, 152). This framework consists of eight elements: The prevailing concept of the firm, board system, salient stakeholders able to exert influence on managerial decision-making, the importance of stock markets in the national economy, the presence or absence of an external market for corporate control, ownership structure, the extent to which executive compensation is dependent on corporate performance and, finally, the time horizon of economic relationships.

We do not wish to contribute to a final definition of Corporate Governance. We understand its essence here as a system of supervision of top managers by shareholders. It is shaped by law and other social norms. Sometimes, as in Germany, stakeholders can participate to a minor degree in the supervision. With this understanding Management Control is primarily concerned with the internal control of managers by managers and the management control of activities, production and cash flows within a corporation or another organisation. In this

¹ For a short historical outline, see Bouquin (1994 and 2005) and Schwarz (2002).

paper we argue that Corporate Governance is supported by MCS. Improvement of the second contributes to the improvement of the first. In order to improve both we need a deeper understanding of both. However, our focus will be here on MCS. Different authors as well as different countries seem to have a different understanding. We will therefore compare the evolution of this concept in Germany and France and relate it to the North American concept.

The paper is organised as follows. We begin with the evolution of the North American concept of Management Control. Two functions prevail in this concept: the support of corporate governance and the information of the managers about the business processes. The next two sections describe their evolution in France and Germany. In the third section, we argue that MCS are instruments of corporate governance. We also provide some historical insights into the ways in which the concept of community influenced both Corporate Governance and Management Control in Germany and France. Then we deal with Management Control as a representation for the managers. Finally, we look into the professionalisation or institutionalisation of the management control function. As a conclusion, we propose further research into the path dependency of the interrelationship between Corporate Governance and MCS. Throughout the paper, we take a historical perspective.

II. The North American concept of Management Control

MCS is an evolutive concept, an ambiguous one too, because its mission, as will be shown, is to cope with a kind of ambiguity embedded in any situation involving managers. However, Management Control is not a culture free concept and practice. There are important reasons for that situation.

The first reason comes from the fact, recently rediscovered, that MCS, as key devices of the internal control of organizations, support governance systems or can even be regarded as parts of them. Those systems, in spite of their new tendency to globalization, have been much more specific. The French case and the German one are typical examples.

The second reason takes its source in the fact that the management control process is built on a north-american reference grounded on strong hypotheses about the representation of the firm, motivations of employees and managers'role. It is clear that such hypotheses cannot be considered culture free.

Moreover, one should be clear about the meaning of Management Control. It is striking to note that the majority of authors dealing with the subject feel themselves obliged to define "control". The great classic authors from Fayol to Urwick and M.-P. Follett have devoted chapters to the matter. The term is ambiguous: to check or to control? To control or to be controlled ? It is often suggested that the French and the Germans see the checking behind control, while the Anglo-Saxons see steering there². Such debates are not over, even in the North American world. R. Simon from Harvard University proposed 1995 a very broad vision of control and K. Merchant (1982) revised the classic Anthony's typology distinguishing, within control, strategic planning, management control and tasks control. Other typologies exists and they are numerous (Chiapello, 1996) but, and this point will be discussed beyond, all of them are focusing on the way of controlling.

If the word "control" is ambiguous, should we give it up? The answer is straightforward: some authors (Reeves and Woodward, 1970, for instance) note that the word «control» is largely used instead of "command" or "coordination". There is a tendency to use «to control» (it is the case with Anthony and Day, 1952 and Anthony, 1965) to cover a good part of Fayols management process (Prévoir, Organiser, Commander, Coordonner, Contrôler - meaning to forecast, to organize to command, to coordinate and to control – in fact to check) or of Gulick's (1937) POSDCORB (*Planning, Organizing, Staffing, Directing, Coordinating, Organizing, Reporting, Budgeting*). There is no surprise in such a fact. To control is not to command because the link with the subordinate is remote. This last idea is straightforward.

² Fayol is to be quoted here: "control consists in verifying that all occurs in accordance with the adopted program, the received orders and the allowed principles" (Fayol, 1916, 133). This is different from Robinson (1925, 147) : "*Control is that fundamental of organization which comprises the means of providing the manager and the executives of an organization with continuous, prompt, and accurate information concerning the efficiency of operation, what the business is doing what it has done in the past and what it can be expected to do in the future. [...] Control involves three principal elements: forecasting of results, recording of results, and placement of responsibility for results.*"

Control is mainly remote command. There is no need to abandon the concept of control because of its ambiguity - this ambiguity is one of its advantages. Ambiguity is the essence of the modern organization, with all the psychological and sociological dimensions that can be attached to it.

Why Control, for what use? Is the question perhaps useless? In any case, nobody asks it. The answer given by Anthony (1965) is taken for granted: "To achieve goal congruence in an organization". However, such a vision may be applied to most organizational tools, and not only to MCS. Control has typologies, concepts (Otley and Berry, 1980), but no common agreed conceptual framework.

For the remainder, some remarks by Anthony can clarify the issue. The organizations must set up systems of control that support the processes of control. Those are, according to Anthony, more general than the systems and with them, his typology deals. The contingency of the systems of control is on one hand due to specificities of managers, on the other hand to multiple variables known as factors of contingency in organizations theory (size, complexity, foreseeability and trend of the activity, technology, institutional constraints, etc).

Conversely, one is allowed to take some distances with the basics of Anthony's conceptual framework, which is a rather specific hierarchical vision of management: operational control deals with elementary tasks, activities that do not belong to management, because management, in Anthony's framework, consists in ensuring the responsibility for activities and entities, not to enter into the details of the tasks. It is by the instruments of "management control" that managers control these "macro-tasks". Such a concept is an implicit impression of a well-conceived organization, but it is not really a viable paradigm because the border between task and activity is not clear. It is interesting to have in mind that Activity Based Costing (ABC) trying to define with the same „paradigm“ the notion of "activity" experienced the same difficulty. ABC and ABM never came to a clear definition what an activity is.

The Anglo-Saxon framework is rather clearly made up today, in the sense that the MCS of the large companies, from now on, have as a starting point general standards, which take their

sources in the managerial innovations of Dupont and General Motors in the 20s. An enormous piece of literature is available about it.³

This framework builds of Management Control on a set of tools based on information systems, which have at its origin mainly the accounting information system. It makes it possible to remote management and decentralization, thanks to a system of delegated objectives and means. It is based on the business model and the strategy of the company. It addresses managers because it entrusts them with the responsibility for situations in which the link between the aim and the resources to be mobilized is complex and depends on expertise more than on programming.

This model has two principal functions that influence the tools it needs. The first function of Management Control is to support corporate governance. If one summarizes the idea of corporate governance like R. Perez (2003) by considering it as the "management of management", it is clear that this expression applies to the modern vision of management control. This one, in its North-American version, tends to perpetuate in-house the modes of relationship, which connect the agents (executive) and their principals (shareholders).

The second function of MCS is to provide the managers with data to induce them to act in the direction of the strategy. MCS describe and modelize the company processes. These two functions have direct consequences for management tools.

³ Chandler (1962); Sloan (1963); Chandler and Salsbury (1971); Kuhn (1986).

III. Some remarks on MCS as instruments of corporate governance and on historical influences in Germany and France

MCS are instruments of corporate governance. They allow for decentralization in a diversified company, which is forced to distribute the work of management between the center and the periphery. What must be done by the “center”, what must be done by middle management? The Sloan’s principles at GM mainly treated this specific question. Years later, the Ashridge Group is still working on it with its worldwide comparative analyses.⁴ Williamson (1970) did see in the case of General Motors and Dupont a sort of internal capital market thanks to the use of the ROI, the supposed model of an effective organization, where the leaders work out the strategy and impose it then to the intermediate managers. However, it has been shown recently that Sloan hid, behind a conventional description, which was made to comply with the attitude of Pierre Du Pont, the shareholder, a more complex reality in which the heads of divisions got profit from strategic latitude much stronger than that one believed to see (Freeland, 1996, 2001, 2002).

In this function, Management Control rests on

- The definition of centers of responsibility as independent as possible ones from others (ideally in theory centers of profit),
- The choice of measurable targets,
- The definition of the necessary resources,
- The ex post measurement of results,
- The omnipresence of the information systems.

The exchanges between centers of responsibility are generally traced by internal charges and transfer prices. These principles lead to a structure organized around business units in a diversified company, and this structure is perfectly adapted to a segmental reporting as in the international accounting standards (FASB and IASC-IFRS) demanded. Management Control supports corporate governance.

⁴ Goold and Campbell (1987); Goold and Quinn (1990); Goold, Campbell and Alexander (1994).

The wave of value creation measures had a direct impact on management control, which had lost sight of the importance of the cost of capital and of its management. The concept of "stakeholders" and of sustainable growth undoubtedly will also influence the systems of management control. In the future, the recognition of fair value in financial accounting and the key role given to intangibles assets in corporate value will influence MCS and their accounting tools. The Sarbanes Oxley Act and the laws taken in Europe upset MCS, not only by the introduction of new metrics but by making of it a key element of the internal control, in charge of bringing the guarantee that policies decided on by the shareholders are applied up to the bottom of the operational line.

Many authors have shown that the dominant conception of control is North American and that it describes the way of conceiving the organization, which any North-American will consider normal. It is interesting that Sloan did take for granted that the system set up by the constitution of the United States of America could be transposed as system of management for General Motors. P. d'Iribarne, after G. Hofstede, showed that the processes are not neutral, that they comprise more or less valuable roles according to values in which one believes. Hofstede (1980) concluded in a famous and discussed study that some "factors" (in the sense given to this word in statistics) describe what one calls the national culture: the acceptance of the risk, the hierarchical distance, masculinity or femininity and so on.

One cannot miss noticing that the Germans like the French are attached to traditions rather different from the North-American one. The German tradition goes back to the guilds that became elated during the Age of Romanticism. In the beginning of the 19th century, the Austrian economist Müller opposed Adam Smith. Instead of Smith' doctrine about the "interet de tous" he demanded a doctrine about the "interet generale".⁵ This opposition against laissez faire favoured a strong control by associations and the state and it is common to important economists. It continued from List over the socialists and communists⁶, the historic school and the influential association for social policy up to Rathenau and Sombart. Finally, it culminated in the economic system of the fascists. List wrote: "I barefaced claim: Every industry within the state which is not controlled by the state is the beginning of the fall of the

⁵ A detailed investigation can be found in Barkai (1988, 68-102).

⁶ According to the Communist Manifesto, an association will replace the bourgeois society. Association is the common goal – with or without private property is the differentia specifica.

state.”⁷ On the macro-level, the national economy was seen not as an abstraction but as a living organism.⁸ For Roscher (1880, 88), one of the founders of the historical school that influenced over several decades the public opinion, the state was the most important immaterial capital (intangible asset) among others like customer base, know-how and trust.

Practical relevance and economical success got the idea of associations and planning during World War I with the work of von Moellendorf and Rathenau⁹ who organized the industrial production during these years. Rathenau (1921) wrote after the war a book under the title “Die neue Wirtschaft” (The new economy). He described it as a private-sector economy with a community will.¹⁰ His concern was more productivity and less waste of every kind, which is the main objective of management control. “Today every loss, every waste is a matter of the community”.¹¹ In his book, he even gave a description of the cost savings known now as the experience curve. He argued with cost savings against laissez faire and propagated the central will of an organism instead of the multiple effects based on equilibrium by chance. Then he described the working of a system of associations that generates that central will together with a scientific plan of the division of labour. He distinguished those associations sharply from guilds that simply secure common individual interests. In his understanding, an association is a production community that connects all members in an organic way and is based on self-government.

The montan union (or association) founded after the war and the Provisional Economical Council founded in 1920 can be regarded as first applications of this ideas. The Provisional Economical Council had 326 members from all economic branches (including trade and consumers). The bosses of large corporations were among them (Siemens, Bosch, Stinnes, Rathenau, Borsig, Duisberg and others).¹² Another important association was the committee for economical efficiency founded in 1921 with C.F.Siemens as first chairperson.¹³ The committee was influenced by scientific management in general and Hoover’s report “Waste in

⁷ Citation after Barkai (1988, 75), translation by Schwarz.

⁸ F.e. Roscher (1880, 24, 113), Schmoller (1920, 5).

⁹ Rathenau (1921, 75) uses the term „war socialism“ for their concept and it certainly influenced Lenin’s „war communism“.

¹⁰ Rathenau (1921, 27).

¹¹ Rathenau (1921, 40).

¹² See Nussbaum (1978, 76 ff.).

¹³ See Nussbaum (1978, 173 ff.).

industry“ especially. The intention was to make up ground against the US corporations by introducing methods of rationalization into industry. Siemens declared in 1925 that the committee wanted to take all suitable methods from the American example and to adapt them to German needs¹⁴.

Later on Sombart's (1934, 231) concept subsumed the associations under the will of the state. His concept was a basis for the fascist economic order.¹⁵ Instead of 1600 associations in the industry, which worked together based on voluntary agreements the economy was structured in 827 groups.¹⁶ Important entrepreneurs and managers were the leaders of the groups. The minister of economics appointed them and they worked on a voluntary basis. Membership was forced and the control based on the leader principle.

The idea of corporatism was also widespread in France, like more generally in Europe. However, if it largely influenced the work of pioneers of management in France like Detoef or Rimailho¹⁷, it did not lead to an organization in which the State was to play the first part. It is the model of organization grounded on professional branches, in fact largely inherited from the history and promoted by the social Catholicism, which these polytechnicians supported. Management accounting was a major stake in this construction, as the action of Rimailho at CEGOS shows it. The goal was, through the construction of a uniform cost accounting system (method of the homogeneous sections), to prove the capacity of a professional branch in founding what one would name today (in a reminiscence of Taylor) "good practices" (or "best practices") and to allocate the resources as well as possible, closing the less performing firms. Rimailho used the term 'homogeneous section' for a team (or a department, or a shop etc.) in which each member may have his own task to perform. That task may differ from the other members's tasks, but in the team, each order is processed through the elementary tasks of each member. In such an organization, providing that each specialized task is done the same way

¹⁴ See Nussbaum (1978, 176).

¹⁵ Strasser, one of the fascists active in the conceptualization of the economic order under national socialism, mentioned Schmoller, Rathenau and Sombart as forerunners of fascist ideas, see Barkai (1988, 101).

¹⁶ See Zumpe (1980, 133).

¹⁷ See Rimailho (1936) and Bouquin (1995a, 1995b, 1997a).

by the worker in charge of it, the elementary specialized tasks of the members constitute a sequence remaining the same whatever order is processed by the team. Therefore, the resources consumed by the team are homogeneous: they are in given proportions whatever order is considered. They are a whole and there is no need to consider and allocate them one by one. These resources are proportional to a driver to identify. In addition, they may be treated as a whole.¹⁸

Rimailho proposed a market economy controlled by "the chief of the profession". He was a typical heir of the social catholic movements of the XIXe century. It seems that the alliance of corporatism and Taylorism was, in France, more discrete and related more to the technique than in Germany. It is through a commission of the employers' organization (the General Confederation of the French Production, CGPF), called CEGOS, that Rimailho, Detoef, Coutrot, Milhaud and others, engineers from polytechnique, using accounting and shop management as tools, gained influence. However, this did not allow Detoef, founder of Alstom, to become president of French employers. One knows that these active characters intervened in 1936 near the Popular Government of France so that the nationalizations were limited. Nevertheless, it was only with the Vichy government that the model of corporate governance inherited from the corporatist movement could be born for one moment.

All that is not anecdotic. The connection with the calculation of the full cost was reinforced at that time, because the full cost was useful to judge competitiveness of firms. It is less known, moreover, that the United States themselves undertake, under the Roosevelt administration, with the NRA and NIRA codes, an evolution which tried to take the same way: a uniform system of calculation of costs was recommended, hundreds of codes were written, a lot of works were published for some branches, before the project was given up¹⁹. By the way, this movement seems to have discredited the full cost and promoted the advent of direct costing (Harris, 1936) which was defended as the best method of income calculation. The debate started under Roosevelt, and was taken again lengthily after the war and until the middle of the Sixties.

¹⁸ A similar system of benchmarking was introduced in Germany.

¹⁹ In Germany, a uniform system of cost accounting was introduced also. Besides full costs, it implemented imputed costs.

After World War II the corporative system was dismantled but some elements of the corporate tradition continued, in France as well as in Germany. The first is the strong influence of the different associations. As a second, we mention the strong connections between firms and between them and banks in terms of cross ownerships. This has consequences for the governance structure. In some important cases, the banks were and are the major shareholder of firms. Their control became visible in times of probable bankruptcy of a firm. When the famous Metallgesellschaft was near bankruptcy, the major banks decided who should be the new CEO to reorganize the corporation. When the Dresdener Bank was near bankruptcy the insurance company Allianz as the major shareholder took over the bank. Cross ownerships are usually expressed in the composition of the board of companies. At least one banker is member on the board of large German corporations. All these bank members on the boards form a network of power. It is the dominating factor for Management Control in German firms. Albach et al. (1993) measured the centrality of 250 important German managers in this network. Twenty-seven managers had a centrality over 50 and sixteen of them were representatives of banks. However, not only shareholder interests are expressed on the board of German firms. The employees as major stakeholders have representatives on the board. This worker participation on the board is also a distinctive feature of corporate governance in German firms. Moreover, the board serves as an information channel connecting the control decisions in different firms. One can interpret these features as a modern form of the traditional principle of association even if the words “network” or “connections” hide the essence.

As third element of the German tradition the concept that a firm is a juristic person continued. This concept is different from the Anglo-Saxon understanding that a firm is the private property of somebody (the shareholders et cetera). A remarkable example is the lawsuit against the CEO of the Mannesmann group and three members of its board: the chairperson and former CEO, the CEO of Deutsche Bank and the former chairperson of the metalworkers’ trade union. The public prosecutors accused them of embezzlement and unfaithfulness against the Mannesmann group by Vodafone because they decided that the CEO and the chairperson would receive millions of Euro in connection with the unfriendly takeover of Mannesmann by Vodafone. Despite the enormous growth of shareholder, value in this process the prosecutors and the German media felt that the firm as a juristic person was harmed.

It is clear that the German and French systems of corporate governance differed a long time, and still differ, from the North-American system. The German solution, it is well known, is concerned also with the stakeholders. The banking system seems able to regulate, at least partly, the usual conflict, very traditional in management control, between criteria of short and long term. Some authors underline the precariousness of the functions of the German presidents of company and their tendency to manage finally only for the shareholder²⁰. The model of stakeholder participation would be often purely theoretical, decisions would already be agreed upon before they come to the discussion in the councils. It could be even worse: it would give the opportunity to hide the essential under an organized flood of data. What use of management control data the German, French American boards of directors are doing? How they approach the decisions when the results on short and long-term enter into conflict? Which repercussions the German stakeholder's model has on management? These questions are open to further research.

IV. Management Control as a representation for the managers

Management Control signals the missions devoted to managers whom it contributes to socialise. The managers of responsibility centers are induced to regard themselves as autonomous, accountable persons in charge for their results, generally measured by financial metrics (sales, ROI for profit centers). Most of the time they enforce the strategy through annual action plans and budgets, but sometimes they propose strategies to the top management.

Instruments designed to help decision-making and monitoring reinforce Management Control. Management accounting of the thirties describes the enterprise through the homogeneous section, whereas ABC sees it through the lens of its processes. These accounting tools can serve various goals, and they are largely influenced by the economic and social context.

Below the level of influence by the corporate tradition, American control methods had a very strong influence on Management Control in Germany. Already during the period of scientific management, German authors were well aware that America had a comparative advantage in

²⁰ See Bloch and Groth (1998).

the development of management methods. Grull (1914, 9ff) saw the following reasons: accumulation of large capital which allowed for the large firm, complete economic freedom, high wages, strong trade unions which demanded shorter working time. Therefore, the firms were under pressure to plan more exactly in order to remove all causes for losses of time. After World War I the committee for economicalness adapted American methods to the needs of German firms. In 1930, Alford's "Management Handbook" was edited in Germany. The German foreword appreciated that, in a scientific sense, the American economy was more highly developed than the German. One important reason was seen in the fact that American firms are more open for the exchange of expertise and other firms receive benchmarks more easily.²¹

American literature and practice strongly influenced budgeting and ratio analysis. Because of the rationing during World War I the firms were already familiar with some planning or budgeting methods. The German Encyclopaedia of Business economics (1926) had an entrance "Budgetary Control"²². The interest in American ratio analysis started out of the problems of German banks caused by the hyperinflation after World War I. These ratios were essentially key performance measures the banks used to assess the credit worthiness of firms or measures to assess the financial health of banks. The focus of interest moved gradually over to the application of key performance measures within the firms.²³ The "Rationalisierungskuratorium der deutschen Wirtschaft" (RKW) organised the introduction of foreign management control methods in the firms. As a result, a number of books on "Betriebsvergleich" (comparison of firms, in today's words benchmarking) appeared.²⁴ During that time up to the sixties performance measurement was discussed as a part of accounting under the name "enterprise statistics" (betriebswirtschaftliche Statistik).²⁵

²¹ See Frölich (1930, IX).

²² Schmaltz (1926, 242).

²³ Schenk (1939).

²⁴ E.g. Schnettler (1933).

²⁵ See Kosiol (1932, 81-90), Bussmann (1963).

After the fascists took over power, they introduced in 1936 a 5-year-plan. Afterwards the prices were fixed based on mark-up costs. The firms were under pressure to compare costs with each other. Under this pressure, the firms introduced “kalkulatorische Kosten” (imputed costs). To the usual costs (based on cash flows) imputed cost amounts for expected interest, risk, depreciation, and entrepreneur services were added. This approach continued in German firms up to the end of the 20th century. Now some academics are arguing against this practice and some firms like Siemens abandon are going to abandon it.

In France, as shown, the technocratic ideology helped develop costing methods and the “tableau de bord” concept. Both were intended to be tools for a more rational management, able to command and direct if the right information is provided. The aim was not to delegate or to transmit the strategic message as the “balanced scorecard” proposes it, a tool that is often (wrongly) compared with the “tableau de bord” (dashboard). The engineers, often polytechnicians, who developed these tools, intended to improve the knowledge of managers the cognitive capacities of whose were supposed to be very large! This is far from the American tradition of Sloan, which uses accountancy to delegate and to be informed by analyses of deviations. The important interest of the French engineers is the “full cost”, i.e. the complete cost of a product or a service. The debate on direct costing will pass for this reason far from the concerns of the French managers, who are persuaded of the archaism of the accounting techniques, and who believe that the “tableau de bord” (dashboard) with its selective data can replace accounting in the process of steering.

Management accounting, indeed, may be twofold. It can be used to identify the cost of a product, an activity, a process. It can also be used in a well-known cybernetic process, by which the standards are compared with the real data and the deviations are identified and decomposed. The French tradition clearly chose the first way, whereas the North American approach was directed definitely more towards the second. It is perhaps also because Europeans tended to calculate the prices starting from the costs, whereas the Americans start more readily from the principle according to which the prices result from the market. How to allocate the indirect costs is the major problem of Rimaillho when he deals with management accounting. This problem led him to build an accounting technique very similar to Activity

Based Costing (ABC). The method of the homogeneous sections diffused after the war by the French charts of accounts is a weaker version.

The investigations show that in Germany, as in France, the tools tend to be standardized. The traditional techniques are well established, in particular those of management accounting.

Thus, in Germany, an investigation based on 320 answers of companies (Amshoff, 1993, 325) found that the most used techniques were, in the order: 1. Budgeting, 2. Cost accounting 3. Ratio Analysis and Systems of Performance Measures 4. Cost-benefit analyses 5. Techniques of the capital budgeting 6. Break even analysis, 7. ABC.

Other methods are less used: SWOT analysis, value analysis, input-output analysis, scoring techniques.

Since this investigation, the ranking did not change appreciably. Two years later, more than 60% of a sample of 76 German companies ranked the methods, which they used, in this order: 1. Budgeting, 2. Internal reporting, 3. Operative planning 4. Capital budgeting methods 5. Cost analysis²⁶

During the 90s, in Germany and in France, four new methods were successful:

- ABC, of which a version called “Prozesskostenrechnung” is known in Germany,
- Target costing,
- Balanced Scorecard,
- Value management²⁷.

The convergence of the tools should not lead to suppose that they play the same roles nor that they are used in the same way everywhere.²⁸ Every firm can plan, but planning can play different roles, as this seems to be the case in Germany and in the USA²⁹. A qualitative study by Ahrens (1996), comparing English and German breweries, shows that, in the two countries, the concept of responsibility, or, more exactly, of accountability, is perceived very differently. For the British, the accounting representation of the performance remains a basic

²⁶ See Stoffel (1995, 159).

²⁷ See Freidank and Mayer (2003, 229-329), Horváth (1996) and the German journals on management control.

²⁸ See Roberts and Scapens (1993).

²⁹ See Kreder and Zeler (1988).

reference frame, even if the conscience of its limits is present. Quite different the German companies are accustomed to use financial and non-financial indicators. The technical processes draw more the attention than their financial image. The manners of treating the risk, to integrate it in the decisions, appear also rather different. Obviously one cannot generalize; it is clear that there is neither only one style of management per country, nor a single cognitive style.³⁰ All existing work is exploratory. Nevertheless, one can make the assumption of some tendencies. At the bottom, for the Germans as for the French, the technical skill remains the source of legitimacy. As far as economic performance is concerned, they remain probably persuaded that this technical skill is the source of performance. The study by Ahrens of German breweries seems to suggest that the technicians see in the recent tools based on processes the means of transferring a part of their power to accountants. These tools help them with a better understanding of the technique. The Anglo-Saxons seem to believe that the reduction of the costs depends on solutions, which the controllers must identify as a core of their own competencies. The French as the Germans think that, if such were to be the case, the technicians would hardly have legitimacy any more. To confine Management Control to the image of reduction of the costs is then the worst of strategies for a controller. In the German breweries investigated by Ahrens (1996) the controller had hardly legitimacy to determine the plan and the objectives, his task was the production of data.

The place of the controller is far from being taken for granted in such cultures. This holds even more if the controller is a mere accountant unable to exceed accounting logic to integrate, for example, that of marketing. One knows in which ghetto the accounting education was held a long time in France - but not in Germany. One understands also the strategy of many French companies, consisting in recruiting controllers among operationals. After 3 to 5 years spent in the management control function, they go back to operational responsibilities.

³⁰ See Hampden-Turner and Trompenaars (1993).

V. Towards the professionalisation of the management control function in Germany and France

After World War II Germany experienced a strong influence by the victorious Americans. Within the German firms and in the academic community a growing interest in American business experience developed. In the year 1952 the Committee on Rationalisation of the German Economy (Rationalisierungskuratorium der deutschen Wirtschaft", RKW) issued the report "Management Accounting" of a study commission of the Anglo-American Council on productivity visiting the US.³¹ This report described the controller and important methods like ratios and budgeting in much detail. At the same time, the report of a mission of CPA sent in the USA was published in France³². Since the fifties publications about internal control and the tasks of the controller have grown.³³ They described him as leading director for finance and administration with tasks in accounting, planning, and statistics, forecasting and reporting.³⁴ The word "controlling" appeared as early as 1956, and its use was analogous to accounting.³⁵ The end of this discovery period of the controller in Germany is marked by two events: the foundation of the "Controller Akademie" by Deyhle in the year 1971 and the working-group for controlling ("AWW Köln 1971") in 1971 by Mayer. The equivalent association of French controllers was founded 1969. The results of these activities are the controller association (founded in 1975) and two journals: "Controller-Magazin" (founded in 1976) and "Controller Berater" (founded in 1983).

The next twenty years saw a growing number of university professors' teaching management control, in France as in Germany. The field got the name "controlling" in Germany, "Accounting and control" in France. It is true that after the heroic period of the dashboard ("tableau de bord"), which tended to separate management control from accounting, the French rediscovered the virtues of accounting and the safety of its close link with management control metrics. It is ironic to note that the Anglo-Saxons, who built on the

³¹ no single author (1952).

³² no single author (1952).

³³ See Auffermann (1952), Ahearn (1954), Zastrow (1955), Pochmann (1956), Ronneberger (1956), Neubert (1959).

³⁴ See Ronneberger (1956).

³⁵ Ronneberger (1956, 28): "Accounting is the source of insight for "Controlling" in the widest sense." See also page 31.

strong link between management control and accounting, make a reverse way, (re)discovering the role of the physical indicators.

In Germany the first textbook on “Controlling” (Hahn, 1974) presented a combination of planning and control. As early as 1973, we find a treatise about “Controlling as a teaching subject” which oriented on a broad spectrum of disciplines: accounting as a minimum, financing, capital budgeting, information systems, management, methods for quantitative analysis (optimisation etc.), basics of organisation theory, social psychology.³⁶ Afterwards the vast majority of university professors used the word “controlling” synonymous with “controllership”. The identification of controlling with controllership is nowadays called the institutional view of controlling. It is true that the USA met an evolution of the same type. "Management control" indicated all the techniques a long time making it possible to organize and to optimize, to rationalize the work of the managers, and these techniques included what Anthony named "operational control".³⁷

The description of the controller’s tasks was not new. Already Mellerowicz (1963, 273-274) and Aghte (1969) formulated the tasks of the controller based on the descriptions of the Controllers Institute of America or the American Financial Executives Institute (FEI). Similar guiding principles were formulated much later in Germany – namely in 1996. One important task was new: “Controllers design and take care for Management Control Systems”³⁸. In France identical work of the DFCG, member of the FEI, goes back to 1969 and was re-examined in 1980. In 1989, the journal “Controlling” was founded in Germany. In the same year, controlling was integrated in departments of accounting within 12 universities and 34 colleges of higher education.³⁹ Eight years later at least 27 departments were teaching the subject, 6 in Austria and 5 in Switzerland.⁴⁰

³⁶ See Hartmann (1973, 336).

³⁷ See Giglioni and Bedeian (1974); Anthony and Day (1952), Anthony (1965); Malcolm and Rowe (1960).

³⁸ See: www.controllerakademie.de.

³⁹ See Mayer (1990, 306).

⁴⁰ See Hahn (1997, 32).

In France, management control and, with a less degree, accounting has been ignored by the universities for a long time. The first Masters in Management (MSG, *Maîtrise des sciences de gestion*) and in Accounting (MSTCF, *Maîtrise des sciences comptables et financiers*) date from the beginning of the Seventies. The German and French universities answered thus an increasing demand of companies. The controllers were anxious to organize their profession, to affirm and mark their place in the flow charts⁴¹. In the two countries one finds the trace of it in the published job offers for controllers. Actually, in France as in Germany and elsewhere, the academic work is much more concerned with the rich and ambiguous concept of control rather than what the controller is supposed to do.

VI. Conclusion

Already a few years ago, the researchers realized that other ways of management existed than those of Japan and the Anglo-Saxon countries.⁴² In corporate governance, the German and French approaches deviate from the North-American model. For as much, specificities of the two countries remain. There is a long time that the first modern studies, related to the organization of the companies⁴³ or, more largely, to the national cultures⁴⁴ pointed to important differences. It still seems that the Germans do prefer neither extreme individualism nor the elitism of the French.⁴⁵ Still one never really investigated what is the core in systems of management, control or governance and what is the source of their ambiguity: the concept of responsibility. It remains that common values seem to lead the companies of the two countries to an approach of MCS rather different from what it is in the Anglo-Saxon world, and seems to structure in a specific way also the roles and the relative influences of the technicians and the controllers. At the time when the Anglo-Saxon model of corporate governance meets the limits of the "shareholders" approach and of the absolute power of the financial indicators, one could only underline the relevance of thorough comparative studies.

⁴¹ On rappellera qu'en Grande Bretagne le CIMA date de 1919 comme la NACA américaine, aujourd'hui IMA.

⁴² See Barsoux and Lawrence (1990, 1991).

⁴³ See Horovitz (1978 a,b,c, 1980).

⁴⁴ Gonzalez and McMillan (1961) is a rare reference at this time, which put the question of the nonuniversal character of the North-American approach of management. See also Hofstede (1980, 1991).

⁴⁵ See Stewart (1996); Gouttefarde (1996); Barsoux and Lorange (1990, 1991, 1997).

In this paper, we provided some insights into historical factors that influenced the evolution of Management Control and Corporate Governance. As a conclusion, we propose further research into the path dependency of the interrelationship between Corporate Governance and MCS. Much more work is needed, in the conception of theoretical framework as well as in empirical studies.

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