

**CLASSIFICATION OF ACCOMODATIONS IN BRAZIL:
THE SBCLASS IN THE PERSPECTIVE OF THE PUBLIC
POLICY CYCLE**

**CLASSIFICAÇÃO DE MEIOS DE HOSPEDAGEM NO BRASIL:
O SBCLASS NA PERSPECTIVA DO CICLO DE POLÍTICAS
PÚBLICAS**

**CLASIFICACIÓN DE MEDIOS DE ALOJAMIENTO EN BRASIL:
EL SBCLASS EN LA PERSPECTIVA DEL CICLO DE POLÍTICAS
PÚBLICAS**

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ABSTRACT: The accommodations segment is one of the most profitable within the tourist activity, which is why the Brazilian state initiative has sought to intervene in different ways in the regulation and planning of the sector, through public policies aimed at optimizing the provision of services. The Brazilian Accommodations System of Classification (SBClass) arises from this proposal, seeking to function both as a tool to support tourists and as a state standardization mechanism for hotel services. However, the low rates of adherence to the system raise the issue of the system assessment as a national public policy. The present study aims to analyze the SBClass within the logic of the policy cycle, which seeks to explain in a simplified way the main processes inherent to the elaboration and

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operation of a public policy. The research presented is descriptive and exploratory, using as a technical procedure the case study, based on the capture of data referring to SBClass and its subsequent organization in the phases of the cycle. During the analysis of the system, it was verified that the SBClass of 2011 presented advances in relation to its predecessors, but that certain aspects still lack discussions for improvement in future versions of this policy.

KEYWORDS: Public Policies; Accommodations; SBClass; Policy Cycle.

RESUMO: O segmento de meios de hospedagem se constitui em um dos mais lucrativos dentro da atividade turística, motivo pelo qual a iniciativa estatal brasileira tem buscado intervir de diferentes formas na regulamentação e no planejamento do setor, por meio de políticas públicas que visem otimizar a prestação dos serviços. O Sistema Brasileiro de Classificação de Meios de Hospedagem (SBClass) surge dessa proposta, buscando funcionar tanto como ferramenta de apoio aos turistas, quanto como mecanismo estatal de padronização dos serviços hoteleiros. No entanto, os baixos índices de adesão ao sistema trazem à tona a questão da avaliação do SBClass como política pública nacional. O presente estudo objetiva analisar o SBClass dentro da lógica do ciclo de políticas, o qual busca explicitar de maneira simplificada os principais processos inerentes à elaboração e ao funcionamento de uma política pública. A pesquisa apresentada é de cunho descritivo e exploratório, utilizando como procedimento técnico o estudo de caso, pautado na captação de dados referentes ao SBClass e sua posterior organização nas fases do ciclo. Durante as análises do sistema, constatou-se que o SBClass de 2011 apresentou avanços em relação a seus antecessores, mas que determinados aspectos carecem ainda de discussões para aprimoramento em futuras versões dessa política.

PALAVRAS-CHAVE: Políticas Públicas; Meios de Hospedagem; SBClass; Ciclo de Políticas.

RESUMEN: El segmento de medios de hospedaje se constituye en uno de los más lucrativos dentro de la actividad turística, motivo por el cual la iniciativa estatal brasileña ha buscado intervenir de diferentes formas en la reglamentación y planificación del sector, por medio de políticas públicas que apunten a optimizar la prestación de los servicios. El Sistema Brasileño de Clasificación de Medios de Alojamiento (SBClass) surge de esta propuesta, buscando funcionar tanto como herramienta de apoyo a los turistas, como mecanismo estatal de estandarización de los servicios hoteleros. Sin embargo, los bajos índices de adhesión al sistema traen a la superficie la cuestión de la evaluación del SBClass como política pública nacional. El presente estudio objetiva analizar el SBClass dentro de la lógica del ciclo de políticas, el cual busca explicitar de manera simplificada los principales procesos inherentes a la elaboración y funcionamiento de una política pública. La investigación presentada es de cunho descriptivo y exploratorio, utilizando como procedimiento técnico el estudio de caso, pautado en la captación de datos referentes al SBClass y su posterior organización en las fases del ciclo. Durante los análisis del sistema, se constató que el SBClass de 2011 presentó avances en relación a sus antecesores, pero que determinados aspectos carecen todavía de discusiones para perfeccionamiento en futuras versiones de esa política.

PALABRAS-CLAVE: Políticas Públicas; Medios de Alojamiento; SBClass; Ciclo de Políticas.

INTRODUCTION

The tourist activity, while investment focus and attention from private and state initiatives, is considered by most scholars to be relatively new, although its economic, environmental and social impacts have already shown

great influence in recent years. Within this activity, hosting always occupied a prominent role media segment, since “the hotel industry is a necessary component for tourism development in any destination that seeks to serve tourists and not excursionists” (Cooper et al., 2007, p. 384), given that these are characterized by not spend the night at the destination.

In the case of the hotel development in the tourism perspective in Brazil, the first efforts to regulate the activity and their providers come together with the first National Tourism Policy, in the 90s. Since then, the development of public policies linked to tourism has always been linked to the guidelines established in each version of the PNT, a document that seeks to express throughout his text the paths to be followed by government action within each jurisdiction in order to achieve pre-established goals for tourism in the country.

The design of a system to establish parameters within which Brazilians accommodations facilities should work dates back to the 1980s, when through Decree no. 84.910/80, the Brazilian Tourism Board (Embratur) made it mandatory for all national accommodations in the registration company and the consequent classification. The development of this system was driven mainly by an increase in expression of the hospitality sector in the country, in a historical period in which tourism as a whole increasingly reached relevance in the international arena. In this sense, to guarantee the quality of services became prime agenda for managers and public officials linked to tourism and hotel activities in the country. Years later, observing the problems related in particular to the recognition of the 1980 system with the enterprises, the version would be redesigned and reimplemented in 2002.

With the low adoption rates recorded in the 2002 model, the Brazilian System of Accommodations Classification (SBClass) would emerge in 2011 as the third version of a state classification system for Brazilian accommodations, supported by Ordinance no. 100 June 16th, 2011, by Ordinance no. 273 of June 21th, 2011 and the General Tourism Law, Law no. 11.771/2008. Despite the government’s effort to seek nationally standardize the classification of lodging facilities, low records recorded at 2011 system again attract the attention of public officials, raising the debate on which aspects of the preparation of public policy were not properly addressed.

Assuming that scientific production aims to appropriate the reality to better analyze it, coming later to produce changes in the medium under study, it is important to recognize the importance of technical and scientific production as problem identification tool in society and promoting mechanisms to solve them. In this context, the inclusion of scientific production in the field of public policy classification in the hosting industry comes up as a way to enable the production of knowledge on the subject. In this sense, the present study sought to identify the process of creation and functioning of SBClass as a public policy accommodations regulation in Brazil, from the public policy cycle logic.



The policy cycle constitutes one of the most practical approaches to analysis of public policy as it outlines the “life” of a policy in individual phases, there by promoting the directed study of each process involving the creation and operation of public policy. In order to implement this academic production, it was used as a methodology for analyzing the cycle of public policies proposed by Secchi (2012), which is outlined in the problem identification, agenda setting, policy formulation, decision-making, policy implementation, evaluation and termination of a public policy. Following this guideline, they were listed along the production referring to the milestones SBClass in each stage of the policy cycle.

PUBLIC POLICIES: DEFINITIONS AND IMPORTANCE

Developed primarily as an academic discipline in the United States, public policies have emerged as a break-up of Political Science, mainly interested in analyzing issues related to states and their governments. Throughout its development, research methodologies and concepts involved in formulating these analyzes eventually result in different conceptions about what exactly would be public policies, which should be your area of expertise as well as its object of study.

From this perspective, Dredge & Jamal (2015, p. 287) posit that “[...] planning and policy are dialectical concepts: their meanings are socially constructed and depend on the context in which they are applied”, summarizing the idea that set a public policy concerns not only the policy itself, but on the whole environment in which it operates. Corroborating this view, Wildavsky (1979, according to Parsons, 2007, p. 32), describes the policy analysis as “[...] applied a subfield whose contents can't be defined from boundaries between disciplines, but based on what seems appropriate for the circumstances of the moment and the nature of the problem.”

Addressing some of the concepts already postulated for public policy, one of the most used in the field is developed by Harold Laswell, considered one of the “founding fathers” of the discipline. According to the logic of Laswell, all decision-making and analysis of a policy can be summarized in three basic questions: who gets what, why and what difference does (Laswell, 1936, according Souza, 2006).

From a more schematic view, Saravia and Ferrarezi (2006, p. 28) defines that the public policies “are a stream of public decisions, oriented to maintain the social balance or introduce imbalances intended to change this reality”. The same authors also posit a definition ruled on the issue of implementation of public policies, according to which

[...] we could say that it is a system of public decisions aimed at actions or omissions, preventive or corrective, to maintain or modify the reality of one or more sectors of social life, by defining objectives

and strategies of action and allocation of resources to achieve the established objectives (Saravia & Ferrarezi, 2006, p. 29).

Considering the question of the study of public policy, Secchi (2012) also points out that there are two possible approaches to them: state approach and multicentric. According to the state logic, only the State can be recognized as a source able to establish a public policy while in the multicenter bias arises the idea that this would be just one of many institutions that make up the complex that the author calls "public policy network".

When it comes mainly from the world scene in the post-World War I, the crisis of grounded democracies in economic liberalism ultimately result in a political, economic and social situation in which there was an appreciation of the state figure as regulator of the activities developed by a country. Within this new context, public policies have emerged as a kind of rational tool used by governments to better meet the needs of a society (Dias, 2011).

As regards the relevance of public policy in a social organization, authors such as Pinto (2008), Wu, Ramesh, Howlett & Fritzen (2014) and Mattos & Baptista (2015), highlight the "organizer" bias of these mechanisms.

This approach points out that "public policies occupy a central place in the world of public managers by providing them potentially both the legitimacy and the resources they need to perform their duties at a high level of intelligence, sophistication and competence" (Wu et al., 2014, p. 13). In this sense, it is vitally important to recognize the relevance of public policy as an instrument of public officials' enabler of work, since it is through them that depict new ways to plan and organize different sectors of society.

PUBLIC POLICY CYCLE

The need to be ordered in a logical manner the process through which public policies are constructed came about between the nineteenth and twentieth centuries, influenced by the strict parameters of the exact and natural sciences. To Dredge and Jamal (2015, p. 290), this search for a systematic mechanism for public policy has resulted in a situation in which

from disciplines and fields of study, including politics, public administration, political science, development and regional planning and influenced by the dominance of positivism and scientific method for most of the twentieth century, there was a strong demand for prescription ideal process planning.

It is in this context that arose several analysis methodologies for public policies, such as the garbage can model of March and Olsen (1972), the Sabatier and Jenkins-Smith "advocacy-coalition" (1993), the balance model interrupted of Baumgartner and Jones (1993) and the cycle of public policy, which will be the methodology of analysis discussed in this paper.



The main purpose of the public policy cycle is to act as “a display scheme and interpretation that organizes the life of a public policy in sequential and interdependent phases” (Secchi, 2012, p. 33). In this sense, the subdivision of the development of public policy process into smaller steps would facilitate the understanding of politics as a final product of these steps, besides facilitating the identification of policy networks present in each of them, the mechanisms used in its preparation, as well as any inconsistencies and errors to be corrected in politics (Frey, 2000).

In what regards to the phases that would compose the public policy cycle, there is still no consensus among authors in relation to a specific sequence of steps in the cycle. According to Frey (2000), there are only three phases common to all proposals cycles: formulation, implementation and evaluation, and from these three pillars can be established other phases for the analysis of a policy, according to the context in study.

However, in contrast to this cycle of view as a logical and rational sequence of ideas, it is important to note that the elaboration of a public policy process does not occur in a linear and orderly manner, strictly obeying all the steps in a cycle. The main criticisms of the methodology refer precisely to the false idea of organization and logic that it conveys, arguing that the isolation of the phased process could eventually be reflected in an individualized approach to each of them, ignoring the wide range of relations between each step (Secchi, 2012; Pinto, 2008; Mattos & Baptista, 2015).

Despite all the cons mentioned above, because of didactic feature of the cycle in the understanding of public policy process, this system is still being widely used by researchers, especially due to the mechanism of practicality as an analytical tool to identify crucial aspects for understanding of public policy (Pinto, 2008; Frey, 2000). Following this bias of reasoning, it is necessary to recognize the importance of the public policies cycle as an academic framework analysis, enabling the “perception that there are different moments in the process of building a policy, pointing to the need to recognize the specificities each of these moments, enabling greater knowledge and intervention in the political process” (Mattos & Baptista, 2015, p. 228).

THE SECCHI'S PUBLIC POLICY CICLE

In terms of the different versions presented to the stages of the public policy cycle, a recent enough was developed by Secchi (2012), in which the author defines what will be, in his view, the seven main stages present in the cycle: problem identification, agenda setting, policy formulation, decision-making, policy implementation, evaluation and termination of a public policy.

The first phase of the cycle is to identify the problem, which is considered by the abovementioned author as “the discrepancy between the status quo and

an ideal possible situation" (Secchi, 2012, p. 34). It is understood, however, that the problem of the identification process is intrinsically related to the perception of political actors and society itself, since for a situation will be considered as problematic, it is necessary that both the sectors mentioned to consider how uncomfortable and have an interest in changing it.

The agenda setting is taken as an "operative" phase in the development of public policy, because even in a situation that presents both a public issue and the engagement of civil society in solving it, these aspects do not necessarily mean that the problem will be considered relevant for policy makers. In this sense, Kingdon (1984, as cited in Mattos & Baptista, 2015, p. 230), sets the agenda as a "list of subjects and issues on which the government and people connected to it focus their attention at a given moment". In technical terms, the agenda can be further classified according to certain characteristics of the problems that will serve you as a working object (Secchi, 2012; Mattos & Baptista, 2015; Souza, 2006). The policy formulation is the establishment of the goals will be met through public policy, besides the elaboration of strategies and actions to be developed in order to meet these objectives (Secchi, 2012). Regarding the alternative formulation, it is interesting to note that at this stage is that come the main "tensions" between the actors involved in policy-making, due to the fact that "many decisions involve conflict, negotiation and compromise with antagonistic interests" (Mattos & Baptista, 2015, p. 238).

In this sense, the policy formulation is based both in the search for mechanisms to enable compliance with the pre-defined objectives, and by conciliation or overlapping interests of the parties involved. Soon after the formulation of alternatives, the actors of public policy which will select the proposals that are to be actually implemented, and the objectives which will be linked, which is the decision-making process (Wu et al., 2014). The implementation is the process step in which the previously selected options are implemented through different mechanisms selected. To Saravia and Ferrarezi (2006, p. 34), this phase of the cycle is considered of utmost importance, as it allows the "study of obstacles, which normally oppose the transformation set out in results, and especially the analysis of bureaucracy". Therefore, the analysis of the implementation process allows the actors identify gaps in the development of public policy, seeking alternatives to solve such problems.

The stages of policy evaluation and termination are intrinsically linked to the fulfillment or otherwise of the objectives of public policy. The evaluation process consists primarily of examining the results obtained during the term of a policy, in order to establish whether it was effective or not mitigate the public problem that gave rise to it. In this sense, the main criteria used in the evaluation of a public policy are the economy, economic efficiency, administrative efficiency, effectiveness and equity (Secchi, 2012). Finally, the process of policy termination is when this is no longer considered relevant in a society, a situation that can occur either by the full resolution of public concern, such as



the inefficiency of the established political or loss of importance of the issue on the agenda (Secchi, 2012).

PUBLIC POLICIES FOR ACCOMODATIONS IN BRAZIL

The quest to classify the enterprises within the hosting industry in Brazil is old, and his first attempts in the 70s (Castro & Lara, 2014; Meira & Angels, 2014; Knupp, 2012). This need for regulation was mainly caused by the substantial increase in tourism around the world, a situation that resulted in a progressive intensification of the actions of governments within the accommodations complex, in order to ensuring compliance with a quality standard to be offered to consumers, in order to maintain profitability in an increasingly competitive market (Castelli, 2003; Meira & Angels, 2014).

With regard to possible classification systems, Castelli (2003) argues that there are basically three applicable models: self-classification, private classification and the official classification. In Self-classification the projects classify themselves without the existence of a comparison with other enterprises, whereas in the private classification exist an evaluation guided by parameters established by a private organization responsible for analysis and classification, so that the interested enterprise in precise classification adapt to the requirements laid down. Already the official classification is implemented by authorities, based on predetermined criteria and requirements for the evaluation of the enterprise, as well as with SBClass.

Regarding the idealization of a system like SBClass, Bastiani and Macedo (2016) define them as a set of organizational elements, "for which a manager and the government turn their attention because they have the interest to know how to behave towards the performance levels desired in view of the guests" (Bastiani & Macedo, 2016, p. 94). In view of this, it is understood that the dynamics of development of a system like SBClass must be articulated by state officials in order to promote, on the part of enterprises to adhere to a management model in which all elements of the organization are aligned in order to meet the expectations of guests and the quality of service offered. In an industry such as hotels, appreciate by criteria such as this becomes essential, since "in the highly competitive market of tourism, the quality factor is the only criterion that imposes itself naturally to determine the success of products and services" (Souza, Meira & Maske, 2012, p. 546).

The first accommodation classification system legally implemented in Brazil dates back to 1980, and this was set up by Decree No. 84.910/80, which made mandatory the registration of all lodging facilities in operation in the Embratur (Decree No. 84.910, 1980). Subsequently, the loss of credibility of the system, after a long time in use, would cause the state managers to rethink the model in force (Menezes & Silva, 2013), which would culminate in a new classification matrix for accommodations, sanctioned through Normative Resolution No. 416 of 22th November 2002. This new attempt to implement a

rating system arose from a partnership between Embratur and ABIH, making from there the registration in the system as an option for enterprises.

Like its predecessor, the 2002 system just demonstrating flaws in its operation over time, the main problem here observed poor adherence to register by the developments, having this recorded in their "best" stage 31 accommodations, within a sector which at the time had somewhere around 6.000 enterprises (Menezes & Silva, 2013). Because of these aspects, the 2002 classification model was repealed in 2008, at which the agenda of a new system back to the national agenda.

Thus, the SBClass was established by Decree No. 100 of June 16th, 2011, and reaffirmed by Ordinance No. 273 of 21th June, 2011. State agents sought in the construction of this new document to reconcile the concerns and proposals of several actors related to the hospitality sector, thereby setting new standards for the classification of lodging facilities that could in fact help in matter of ordering the services within this segment.

THE 2011 SBCLASS

The latest version of the Brazilian Accommodations System of Classification (SBClass) was established by two laws, one concerning the Tourism Ministry and the other to the National Institute of Metrology, Standardization and Industrial Quality (Inmetro). The existence of a classification system had already been fixed by art. 25 of Law No. 11.771/2008, which defined that the executive branch would be responsible for establishing a regulation on the classification of types and quality standard of services. In this regard, the Ministry of Tourism (2015, p. 3) points out that

The Brazilian System of Accommodations Classification (SBClass) was prepared in a participatory manner, through a broad partnership between the Ministry of Tourism, the Inmetro, the Brazilian Society of Metrology - SBM and civil society, and adopted as a strategy for the country, increasing the sector's competitiveness.

For these reasons for the redesign and implementation of a new classification model, it is interesting to note the national context in which the construction of this mechanism is inserted. Just before the start of the preparation of SBClass, Brazil was selected as host country for two large mega-events: the FIFA Football World Cup 2014 and the Olympic Games in 2016.

About to receive a stream of tourists ever seen in the country before, it became a vital need for Brazil to meet international standards followed within the hotel in order to better serve tourists who traveled to the country. The urgency to solve such problems may have worked at the time as a decisive factor for the inclusion of the system on the agenda again (Menezes & Silva, 2013).

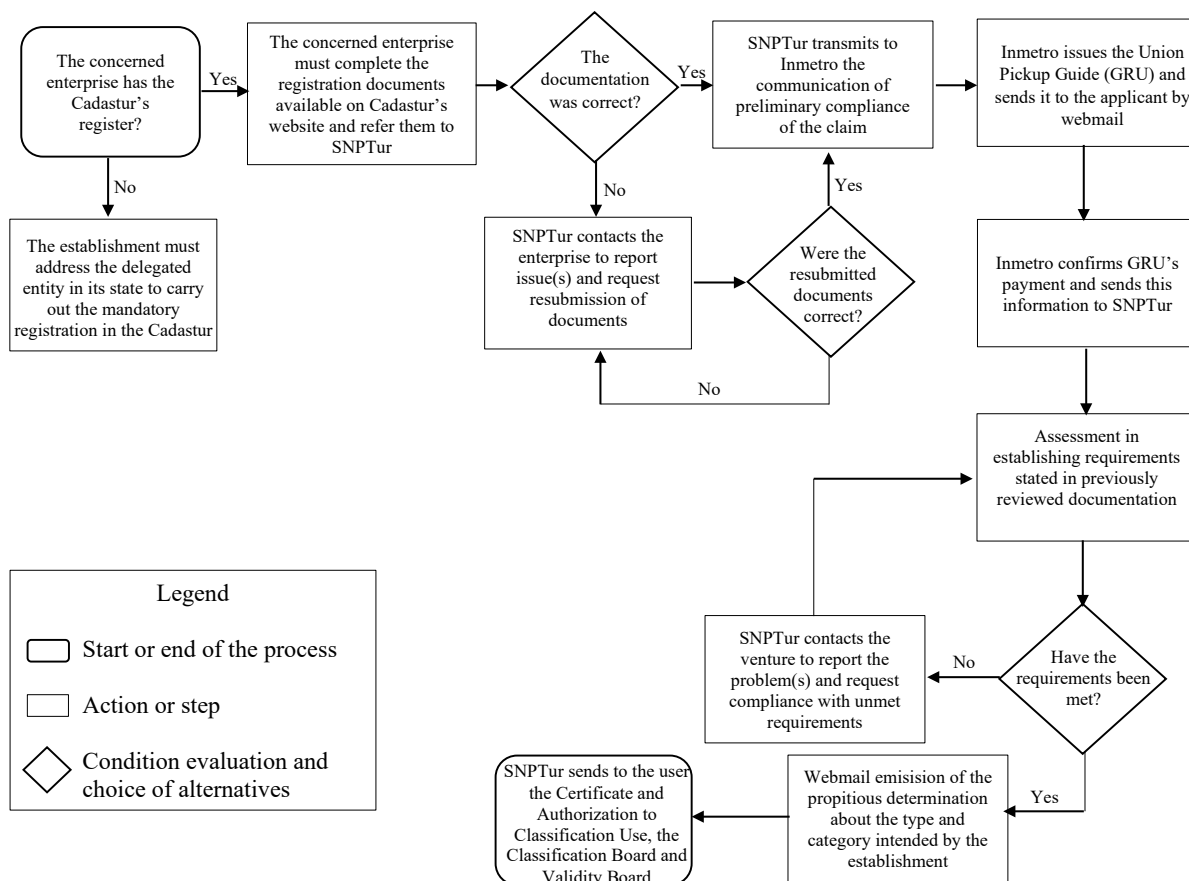
Seeking to ensure a standard of quality of services provided by national lodging facilities, the SBClass thought was establishing three basic evaluation



requirements: infrastructure, services and sustainability. Within each of these requirements was outlined one Rating Matrix, with all the features that each type of registered enterprise must meet, and these are further subdivided into mandatory requirements (obligatory) and elective (optional, as some conditions). For the classification, the applicant must meet 100% of the mandatory requirements and at least 30% of elective, go through the process of completion and validation of documents, plus an on the scene evaluation of a representative of Inmetro (Martins & Flowers, 2017; Bastiani & Macedo, 2016).

As announced by the Ministry of Tourism (2010), the seven types of lodging facilities provided by SBClass are the hotel, farmhotel, bed and breakfast, resort, historic hotel, lodge and flat/apart hotel, and for each of these have been set a minimum and maximum number of stars, according to the requirements met by accommodation, on a scale that can go from one to five stars (Martins & Flores, 2017). The steps involved in the registration process can be seen in the figure below:

Figure 1 - Operation of the SBClass's register*



Source: Prepared by the author, 2018.

METHODOLOGY

This article constitutes a theoretical and analytical work with qualitative approach, descriptive and exploratory methods, dedicated to analyze the SBClass system according to the logic of the public policy cycle for Secchi (2012). For Veal (2011), descriptive research is one of the most used in the Tourism and Leisure area, since they are areas subject to constant change, and need to be probed with certain intervals, to the new standards to identify themselves force.

In relation to exploratory research, it is understood that this is characterized by the search for familiarity with the topic to be addressed in order to build knowledge commanded about this, or even redesign and raise hypotheses related to the subject (Gil, 2002). In this sense and in accordance with the defined objectives for this work, was used the descriptive and exploratory research to better understand them aspects related to the development of a new state classification system in Brazil, in addition to establishing grants for new research related to the theme.

With regard to the adopted technical procedures, the research was conducted as a case study aimed at understanding the process of creating a public policy, as SBClass fits in this context and its current operating status. Using the case study was due to the feature of this type of procedure that “contributes in a unique way to our understanding of the individual, organizational, social and political phenomena. In all these situations, a clear need for case studies arises from the desire to understand complex social phenomena” (Yin, 2001, p. 21).

Regarding the material considered in the analyzes were mainly used secondary data from books and papers related to areas of public policy, tourism and hospitality, in order to identify these productions, the main points addressed in what pertains to SBClass. With regard to the use of secondary data on tourism research, Veal (2011, p 203) states that:

[...] does not seem smart to the research community spend them unable to extract from them all possible research potential. This requires that you carefully consider what should be the ways to use the available data, usually leading to an inductive approach to research in order to formulate the question: what this data can tell us?

In line with this vision, we sought to identify the productions analyzed references to the context of the Brazilian and international hotel in the historical period in which it operates the SBClass. Therefore, the selection of material to be considered used information and documents from official sources of the Ministry of Tourism, as well as articles and other academic productions that could contribute different perspectives on the events related to the analyzed system, their motivations and consequences.



The treatment of the collected data was according to the logic of hermeneutic research, which is defined as the analysis and interpretation of the content of texts and other documents for the subsequent synthesis of these in new perspectives on a topic (Veal, 2011). As guiding documents were used in the analysis the two jurisdictions to officially establish the Brazilian Accommodations System Classification, the ordinance No. 273/2011 and No. 100/2011, Inmetro and Tourism Ministry, respectively.

Regarding the value of both ordinances as a legal document, it is important to highlight the recent changes implemented in the tourism legislation through the adoption of the Bill 2724/2015 on 20th March 2019, appended to the Bill 7413/2017, the text of the new law provides, among other things, the expansion of the concept of lodging facilities - now including collective frequency enterprises, decreased the mandatory number of accessible rooms in accommodations and the regulation of hosting minors accompanied by only one parent or legal guardian.

However, with regard to the regulation and classification of hosting services, the new wording of the law makes no mention of other registry systems beyond Cadastur, which leaves open the reformulation or not a new SBClass. Within this context, it was decided to keep as background papers to the previously mentioned ordinances, given that these are the two main regulatory system under discussion, and there is no more recent document that provides for this.

The analysis of the stages of the public policy cycle has been structured in the form of subsections of the section "Results and Discussion" with each of them being intended to discuss one of the phases defended by Secchi (2012). The sections were placed seeking to list on the basis of analyzed documents, facts, records, processes and actions that made the situation in which the SBClass was created and conducted its activities in order to lay out the logic according to which the system was designed and its actual results.

RESULTS AND DISCUSSION

As explained in the previous section, the section "Results and Discussion" was divided into sub-topics related to the stages of the public policy cycle in order to better organize the approach of the events related to the preparation of SBClass. Thus, the following sections are arranged in the sequence of the cycle used as a method of analysis, which are: problem identification, agenda setting, policy formulation, decision-making, policy implementation, policy evaluation and termination.

PROBLEM IDENTIFICATION

The problem identification stage is the perception of a public issue as relevant by policy makers, this recognition may be conditioned by several factors.

Regarding the SBClass, it is important to recognize that the public issue for which the system was designed is much older than the model itself, so that before the onset of SBClass had already been devised two other systems that met virtually the same functions. Within this perspective, understand how was the understanding of the problem that led, in 2011, the emergence of SBClass requires return to the context and the problems that led to the creation of the first classification system ever implemented in Brazil.

Although Brazilian legislation seeking regulatory activities related to tourism date back to the 30s, the national hotel industry just happens to attract the attention of public managers more assertively in the decades of 70/80. In this period, with tourism already established as a global phenomenon, major international hotel chains are investing in Brazil, such as the Hilton International Corporation, which in 1971 inaugurated the Hilton São Paulo. The new service standards, logistics and management used by these large networks eventually culminating in the creation of a new model for the hotel industry developed in Brazil, where customers are becoming increasingly demanding and competitive market.

Once consolidated this new context, it became essential to national hotel keep up with new standards of quality and excellence in providing their services. However, this new need arose accompanied by a problem: how to effectively ensure a standard of quality in service delivery and at the same time make the competitive Brazilian hospitality internationally? Based on this initial problem, it was developed in 1980 the first system that classified the Brazilian accommodation. Since then, it is clear that there was in fact a change in public problem behind the creation of classification systems. Each reformulation of models arises essentially inconsistencies or problems identified in the operation of each version, and not of a change in the public problem that boosted its creation.

AGENDA SETTING

The agenda setting is the time when a public problem is considered to be relevant for a policy maker, and happens to be advocated as worthy of attention. In the case of SBClass, system schedule was conducted in the form of a “recycled” program of the government, since they were only adapted several mechanisms previously implemented in other versions of the classification systems, such as the matrices used in the evaluation of projects. In the case of public officials in the last SBClass formulation, discussions about its creation began in 2008, when representatives of the Ministry of Tourism and the hotel industry began to seek new approaches to a classification model, since the 2002 system had not obtained the expected adherence and support from the undertakings.

From the discussions on the operation of the model then in force, and identified new needs in the context of the national hotel industry, the Tourism Ministry would revoke the 2002 classification matrix in 2010, thus beginning the official discussions on the planning of a new classification system. During this period, with Brazil on the eve of receiving the largest tourist flows ever seen in the country due



to the World Cup 2014 and the Olympic Games 2016, the government agenda of the Tourism Ministry has to pay special attention to the development of the new SBClass, starting the assumption that the system could serve as support to foreign visitors who seek for a hosting.

POLICY DEVELOPMENT

Considered one of the most important steps in developing a public policy, the policy development corresponding to the entire process of defining the objectives expected to be achieved with the project and discussed ways in which these objectives will be achieved. The alternative formulation for the SBClass was first given to the definition of public policy model through which this would be set up, namely the decision of public officials to continue using the structure of a state classification system for accommodations.

Moreover, it was also stipulated that the main objective of the new system would act as a communication tool between the hotel industry and tourists, seeking to guide the choice of these by accommodations and also contribute to increased competitiveness within the sector.

Following the definition of the model and the goal of public policy in question, eight workshops were held with the presence of the National Council of Tourism, the business community and hotel associations, industry professionals and agencies for tourism, accounting altogether more 300 specialists involved. The main aim of these workshops was to establish new categories and sorting arrays for Brazilian accommodations initially being guided as possible category classification in hotel, ranch, bed and breakfast, resort, historic hotel, roost, flat/apart hotel and forest accommodation.

Although there is little information available concerning the conduct of workshops, publications in SBClass page on Tourism Ministry's website show that these have been conducted with a view eight main criteria: legality, translated in the search for complying with existing laws that made it mandatory to a classification system; consistency, seeking to develop actions and cohesive proposals to established goals; transparency of information; simplicity and accessibility; quality aggregation and competitiveness in the hospitality industry; impartiality in decision-making; search for constant improvement of the system; flexibility in relation to elaborate criteria and the reality of the hosting industry.

In parallel to the above criteria, the development of Classification Matrix was designed taking into account three major requirements, which would be the infrastructure, services and sustainability. Regarding infrastructure, it sought to establish what are the facilities and equipment indispensable for each type of accommodation (mandatory requirements) and which could be considered supplementary to those structures (elective requirements). As for the services, self-explanatory way, should be directed to the main services offered by each

SBClass's category. Finally, the topics related to sustainability should be developed in view of the main actions that could be conducted by each project related to conscious consumption of resources.

Given the criteria and requirements set forth at the end of the workshops a document was prepared with the pre-established headquarters, which was then made available for public consultation, send suggestions and contributions in Tourism Portal between 13th March to 23th May 2010. Once finished, 6,4 thousand hits were recorded during the public consultation, and the results obtained were exposed on 28th May of the same year, in a panel discussion on the 5th Tourism Fair, held at the Anhembi Events Center in São Paulo.

DECISION-MAKING

Decision making refers both to the selection of alternatives that best suit the goals established for a public policy, as the process of formalization of the policy in the society. The official gave the SBClass system was by the two Ordinances previously mentioned: Ordinance No. 100 of 2011, established by the Ministry of Tourism, and Ordinance No. 273 of 2011 of the Inmetro. The two ordinances, along with the Accommodations Classification Matrix, then started to establish new parameters for the functioning of SBClass, and these devices the materialization of decisions made by public officials.

In the case of the Ministry of Tourism Ordinance, the first aspect delimited this was the definition of a rating scale from one to five stars, internationally recognized standard by tourists and used in hotel classification systems implemented in countries such as France, Italy and UK. In addition, art. 4th§ 1 of the Ministerial Decree declared vetoed the stars of use as a symbol in any endeavor that has not been classified by SBClass, being responsible for the enterprise not in accordance with this specification subject to criminal sanctions.

However, it is important to note that the SBClass system was introduced on voluntary basis, and the enterprises not registered, although prevented from disclosing with the mark of the star rating, could continue to function normally, as long as registered in Cadastur. With regard to the established typologies, the only change made between the initially proposed (discussed in the previous section) and what was determined in the Ordinance of the Ministry of Tourism was the withdrawal of type "Forest Accommodation".

In order to guide the evaluation process of the projects on the classification, the Accommodations Classification Matrix released along with the above Ordinances are divided into mandatory and elective requirements, and set all the items that will be evaluated by Inmetro tax during inspection of the enterprises. In addition to the listed items, the Ordinance established by Inmetro regarding SBClass primarily addresses aspects of the conduct of the evaluation procedures made by the agency in accommodations, the amounts charged



to the enterprises by the evaluation service, pointing out that the payment of service does not necessarily mean getting a rating.

POLICY IMPLEMENTATION

The process of implementing SBClass was officially launched by the two ordinances that sheltered the operation of the system, even in 2011. From there, the institutions concerned could request classification in accordance with the established guidelines, beginning to work of the Tourism Ministry and the Inmetro for the new system. For the first classified hotels a solemn ceremony was held at Brasilia Palace, first hotel in the federal capital on 25th September 2012. During the event, then Minister of Tourism Gastão Vieira made the delivery of 19 Name Boards to enterprises that had obtained the classification by the new system, and at that time 97 other undertakings were already in the evaluation process.

However, in contrast to this favorable outlook for the system, a survey conducted in March 2013 recorded only 33 enterprises classified in Brazil, indicating far below the minimum 100 accommodations expected by the Tourism Ministry on the date. Once pointed this gap in relation to the accession of opportunities, a joint effort of the campaign promoted by the State Tourist Offices in partnership with the Tourism Ministry was started in order to raise awareness among managers of the hotels area about the importance of adhering to the new classification system, and spread the use of electronic records by the guest endeavors. In addition, they also contacted the time 2.000 undertakings regulated in Cadastur, in order to encourage them to get the registration in SBClass.

Still seeking other strategies to expand the system scope, the Tourism Ministry has partnered with the Brazilian Support Service for Micro and Small Enterprises (Sebrae), so that the two entities would then act together in promoting SBClass with the managers. However, both the strategies adopted by the Ministry just not getting the expected return by the agency, which continued to record classified numbers short of targets set for the system, and in 2016 the process of issuing certificates was officially suspended. The numbers of registered enterprises in the system year to year from 2012 to 2016, can be viewed in the table below.

Table 1 - Number of registered enterprises in SBClass

Year	Number of registered enterprises
2012	26
2013	44
2014	58
2015	59
2016	59

Source: Prepared by the author (2018), based on Ministry of Tourism (2013; 2014; 2015; 2016; 2017).

POLICY EVALUATION AND TERMINATION

Regarding the assessment of SBClass while state public policy, it is interesting to consider the two possible methods with regard to the trial of this system process: evaluation *in itinere* (or monitoring) and *ex post* (after the implementation). When public officials responsible for SBClass clashed with the low statements discussed in the previous section, we began an intense process of evaluation of the system that was in operation in order to recognize which issues would be influencing the failure of the then established model. One of the first steps taken in this direction was to conduct a survey in 2013 in which were consulted about 800 enterprises regulated by the Cadastur,

In this same perspective, by analyzing the 2011-2016 Mtur Exercise Management Reports (from 2016 were not released new reports), it's possible to realize that the SBClass was quoted in all the documents as getting an income below targets set for each year, so being proposed new strategies for this implementation. A very specific case of this situation was the 2015 Exercise Management Report (BRAZIL 2016), which found that, about the SBClass, the main points that were hindering the interest of managers in the system would be the costs relating to the classification, paperwork involved in the process and the voluntary classification.

In a clearly unfavorable situation to maintain the system in the way it had been working, on February 17th 2017, the then Minister of Tourism Marx Beltrão submitted to the President of the Republic the bill No. 7413/2017, which deals with changes in the General Tourism Law (2008), and a document with the motivations involved behind the proposal. One of these reasons, which could be considered as marking the extinction of SBClass version discussed in this paper, is that contemplated in item 3 of that document, in which, after pointing out the incongruity of the expenses involved in the preparation and implementation of the system with the results obtained in number of registered, Beltrão determined disabling SBClass then in operation, arguing that the Ministry would initiate studies for the construction of new reference matrices for the national hotel industry.



CONCLUSION

It did not reach the expected impact at the hotel enterprises, the SBClass released in 2011 said in its preparation, with many positive points when compared to two models previously created. The idealization of different matrices for each enterprise type, focus on aspects related to the provision of the service and not only to the premises of the accommodation, and the adoption of internationally recognized symbol of star ratings were criteria considered essential for the differentiation and improvement of SBClass, since these are factors identified as major weaknesses behind the other systems already in place.

However, even with the changes mentioned being built into the system, the SBClass 2011 continued to show some problematic throughout its construction and dissemination, not being thus able to achieve the desired status with its implementation. Among these we can highlight, for example, the proposed system of dissemination campaigns through agreements between the Ministry of Tourism and other entities in order to educate businesses about the importance of adhering to the system.

Although he possessed great chances to culminate in positive results, this strategy turned out to not be made due to "management changes within the Ministry," according to the 2015 Exercise Management Report released by the Tourism Ministry. Since the start of discussions on the new SBClass the Tourism Ministry had 11 ministers, which had different ideas and projects, so that the classification system kept oscillating in the list of priorities of the responsible agents in each mandate.

Moreover, with the spread of search engines, online assessment and the massive demand from tourists for this type of tool, many Brazilian enterprises just consciously choosing not to join the SBClass because of the costs and bureaucracy involved in the system, investing in dissemination on alternative platforms, such as Booking, Trivago and TripAdvisor, or rankings rating as the Guia Quatro Rodas. Being mechanisms, most commonly used and known by guests, and where consumers themselves can make complaints and express opinion of the visited place, this type of platform is gaining more space in the context of the national hotel industry, demonstrating that some specific trends of those looking for a hotel.

The analysis of SBClass within the policy cycle has shown that, although the process of elaboration and implementation of the system has already shown some progress, there are still several points that require restatements for the system to get the expected results of this as a public policy. The insertion of new typologies, incentive promotion for the enterprises seek classification, disclosure of SBClass to consumers, as well as a review of the system surveillance logistics are just some aspects that still show need attention from public officials in order that the system can continue evolving and improving.

Thus, it emphasizes the importance of new research from what was explained here, in order to use the considerations outlined in this production as a subsidy in the elaboration of new models for the classification and organization of the hotels sector in Brazil.

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