**Understanding National Administrative Cultures and Their Role in Administrative Reform:
A Neo-Institutional Model of Administrative Styles**

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Abstract:

Students of organizational behaviour have always been concerned with understanding the manner in which complex organizations – including systems of public administration – tend to create distinctive organizational cultures and the impact these cultures have upon their activities and outputs, including their prospects for reform. Recently, neo-institutional accounts of social and political life have provided a new entry point to the analysis of administrative cultures and administrative reform. For neo-institutionalists, the institutional structure of an organization is seen as creating a distinct pattern of constraints and incentives for state and societal actors which define and structure actor's interests and channel their behaviour. The interaction of these actors generates a particular administrative logic and process, or "culture. However, since institutional structures vary, a neo-institutional perspective suggests that there will be many different kinds of relatively long-lasting patterns of administrative behaviour - each pattern being defined by the particular set of formal and informal institutions, rules, norms, traditions, and values of which it is comprised – and many different factors affecting the construction and deconstruction of each pattern. Following this neo-institutional logic, this paper examines several relatively recent efforts to identify and classify relatively long-term patterns of administrative behaviour. On the basis of these assessments, a multi-level, "nested," model of multi-level administrative styles is developed and applied to the question of observances of patterns of convergence and divergence in administrative reform in many jurisdictions over the past several decades.
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1. Introduction: Public Administration in Comparative Perspective – Understanding Late 20th Century Reform Efforts

Many jurisdictions throughout the world have over the past several decades seen many efforts at administrative reform.[1] These efforts appear to be linked, in that reforms have occurred in many countries at about the same time, and with generally similar content. As the Organization for Economic Co-operation and Development's (OECD) Public Management Committee (PUMA) put it in their 1995 summary document "Governance in Transition":

> OECD countries' reform strategies have many points in common. They are aimed at both improving performance of the public sector and re-defining its role in the economy. Key reform thrusts are: a greater focus on results and increased value for money, devolution of authority and enhanced flexibility, strengthened accountability and control, a client- and service-orientation, strengthened capacity for developing strategy and policy, introducing competition and other market elements and changed relationships with other levels of government.[2]

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[1] On these efforts in Canada see Charih, Mohamed and Arthur Daniels, ed. New Public Management and Public Administration in Canada. Toronto: IPAC, 1997. 143-163 and Kernaghan, Kenneth, Brian Marson, and Sandford Borins. The New Public Organization. Toronto: Institute of Public Administration of Canada, 2000. Elsewhere see McCourt, Willy and Martin Minogue, ed. The Internationalization of Public Management: Reinventing the Third World State. Cheltenham: Edward Elgar, 2001 and Peters, B. Guy. "Public-Service Reform: Comparative Perspectives." In E. Lindquist, ed(s), Government Restructuring and Career Public Services, Toronto: Institute of Public Administration of Canada, 2000. 27-40.

[2] OECD. Governance in Transition: Public Management Reforms in OECD Countries. Paris: Organization for Economic Co-Operation and Development, 1995 p. 25

PUMA argued that, taken together, these elements constituted a "paradigm shift" in administrative thinking. However, they also noted that "there is no single model for reform" and "differences among countries can be seen in emphasis and take-up of particular reforms:

> Certainly countries differ at the level of individual reforms. They place different emphasis on different aspects and implement reforms at varying speeds. The rate of take-up of reforms shows considerable variation among countries: not all countries are reforming the areas described… likewise, there are several important divergences in reform objectives. Some countries, for example, have set a reduction in the size of the public sector as a specific objective, while others put more stress on improving its performance and strengthening its role.[3]

That is, administrative reforms have not been identical, nor have they always addressed the same aspects of administrative structure and performance. The same initiatives have not always succeeded in different jurisdictions, nor has their implementation always yielded the same results.[4] While bodies like the OECD are still willing to argue that "clear patterns of change" have emerged, they have also been forced to concede that considerable divergences exist in the methods, practices and outcomes of reform efforts in different countries.

This is a finding which requires analysis.[5] That is, as this wave of reforms first occurred in the 1980s and 1990s in western Europe and the U.S., the distinct tendency was to assume a greater trend towards convergence in this area than is presently acknowledged, and to attribute this to the triumph of ideological factors such as neo-liberalism, first in the most advanced industrial countries, then spreading through international institutions to the less developed ones. Central to this argument was the assertion that neo-liberal preferences for small states and enhanced markets were codified in a new administrative paradigm, the "New Public Management" (NPM) which contained a series of prescriptions for administration – privatization, contracting out, down-sizing and regulatory reform – whose successful implementation was the subject of the administrative reforms of the period in question.[6]

In many countries, these kind of reforms are often attributed to, or blamed upon, the notions contained in NPM thinking,[7] but the role of administrative ideas is only one of a possible set of factors

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[3] Ibid.
[4] On the actual record of OECD governments in this area see OECD. Issues and Developments in Public Management; Survey 1996-1997. Paris: OECD, 1996-1997.
[5] Lynn Jr., Laurence E. "Globalization and Administrative Reform: What is Happening in Theory?" Public Management Review. 3, no. 2 (2001): 191-208.
[6] Ascher, Kate. The Politics of Privatisation: Contracting Out Public Services. Basingstoke, Eng.: Macmillan, 1987; M. E. Privatization, Regulation and Deregulation. New York : Routledge, 1992; Starr, Paul. "The New Life of the Liberal State: Privatization and the Restructuring of State-Society Relations." In E. N. Suleiman and J. Waterbury, ed(s), The Political Economy of Public Sector Reform and Privatization, Boulder: Westview Press, 1990. 22-54 and Swann, Dennis. The Retreat of the State: Deregulation and Privatisation in the U.K. and U.S. Hemel Hempstead, Hertfordshire: Harvester Wheatsheaf, 1988.
[7] Shields, John and B. Mitchell Evans. Shrinking the State: Globalization and Public Administration "Reform". Halifax: Fernwood, 1998 and Burke, Mike, Colin Mooers, and John Shields, ed. Restructuring and Resistance: Canadian Public Policy in an Age of Global Capitalism. Halifax: Fernwood, 2000.

explaining such changes,[8] and there are serious questions as to the coherency of NPM theory and hence its ability to drive administrative change.[9] That is, multiple efforts at reform in different countries, the patchy record of success and failure and the contradictory efforts to adopt more stringent financial controls on government while expanding the opportunities for citizen participation in administrative deliberations and activities all militate against the early, somewhat mechanistic, view of the links between globalization, NPM theory and administrative reform.[10]

The diverse responses to NPM initiatives, coupled with doubts about the coherence of this potential administrative paradigm itself, suggest that the phenomenon of administrative reforms in the 1980s and 1990s is not well understood and that additional theoretical and conceptual work remains to be done aiding the analysis of this important era of administrative history.[11] This paper suggests a re-examination of the theory and concepts developed in the study of comparative public administration is helpful in this regard, and helps to establish a research agenda with some promise in moving beyond the NPM-inspired analyses.[12]

2. Public Administration Theory and the Concept of an Administrative Style – Promising and Problematic Aspects for Analyzing the Evolution of Civil Service Systems

Part of the blame for the difficulties encountered by analysts in many countries attempting to understand the development of the 1980-2000 period of administrative re-structuring must be placed at the feet of the poor development of theories and constructs in the field of comparative public administration.[13] That is, as Guy Peters noted in his 1988 review of the field:

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[8] See Aucoin, Peter. "Administrative Reform in Public Management: Paradigms, Principles, Paradoxes and Pendulums." Governance. 3, no. 2 (1990): 115-137

[9] See Hood, Christopher. "A Public Management for All Seasons?" Public Administration. 69, no. Spring (1991): 3-19; Hood, Christopher. "Contemporary Public Management: A New Global Paradigm?" Public Policy and Administration. 10, no. 2 (1995): 104-117 and Dunleavy, Patrick and Christopher Hood. "From Old Public Administration to New Public Management." Public Money and Management. 14, no. 3 (1994): 9-16. See also Gruening, Gernod. "Origin and Theoretical Basis of New Public Management." International Public Management Journal. 4(2001): 1-25.

[10] On these contradictory initiatives of "managerialism" and "representativeness" see Aucoin, Peter. "Administrative Reform in Public Management: Paradigms, Principles, Paradoxes and Pendulums." Governance. 3, no. 2 (1990): 115-137. See also Borins, Sandford. "Public Management Innovation in Economically Advanced and Developing Countries." International Review of Administrative Sciences. 67(2001): 715-731 and Kooiman, Jan. "Societal Governance: Levels, Models, and Orders of Social-Political Interaction." In J. Pierre, ed(s), Debating Governance, Oxford: Oxford University Press, 2000. 138-166. On the Canadian experience with these kinds of initiatives see Bourgault, Jacques, Maurice Demers, and Cynthia Williams, ed. Public Administration and Public Management: Experiences in Canada. Quebec: Les Publications du Quebec, 1997 and Graham, Katherine A. and Susan D. Phillips. "Citizen Engagement: Beyond the Customer Revolution." Canadian Public Administration. 40, no. 2 (1997): 225-273.

[11] Raadschelders, Jos C.N. Handbook of Administrative History. New Brunswick, N.J.: Transaction, 1998. See also Raadschelders, Jos C. N. "Administrative History of the United States: Development and State of the Art." Administration and Society. 32, no. 5 (2000): 499-528 and Eisner, Marc Allen. "Economic Regulatory Policies: Regulation and Deregulation in Historical Context." In D. H. Rosenbloom and R. D. Schwartz, ed(s), Handbook of Regulation and Administrative Law, New York: Marcel Dekker, 1994. 91-116.

[12] See Morgan, E. Philip and James L. Perry. "Re-Orienting the Comparative Study of Civil Service Systems." Review of Public Personnel Administration. 8, no. 1 (1988): 84-95.

[13] See Aberbach, J.D. and B.A. Rockman. "Comparative Administration: Methods, Muddles and Models."

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Having recognized the importance of comparison for the development of our thinking about public administration, we now come to the awful truth that the comparative study of public administration is perhaps the least well developed aspect of the study of comparative politics and government despite the long and honorable history of the field.[14]

As Peters and others acknowledged, writings in the field in the 1960s and 1970s were sometimes excellent empirically, but were often idiosyncratic theoretically, failing to develop a set of systematically linked concepts generating a body of accepted principles of administrative behaviour. However, over the past decade, developments in the field of comparative public administration have generated a set of concepts which are of use in analyzing administrative developments such as the reform wave of the late 20th century, and in helping to explain and understand both the patterns of convergences and divergences in administrative behaviour identified by the OECD and other authors.

An important step in this direction was the development of the notion of an "*administrative style*"; that is, a more or less consistent and long-term set of institutionalized patterns of politico-administrative relationships, norms and procedures. The concept of an administrative style is useful for analyzing administrative reform for several reasons. First, it sets out the basic background against which reforms occur, providing a useful aggregate unit for describing the basis characteristics of an administrative system. And, second, in so doing it simultaneously provides a standard or benchmark against which the degree of change in such systems can be assessed, as reforms alter aspects of previously existing administrative styles.

The general idea of such styles is not new, of course, with clear links to not only the foundational studies of bureaucracy and bureaucratization developed by Max Weber and others in the late 19th and early 20th centuries,[15] but also to the first wave of comparative administrative studies carried out after the second world war which focused on the identification and elaboration of national administrative cultures.[16] Recently, however, this idea has re-emerged in the works of, among others, Christopher Knill[17] and Hans A.G.M. Bekke,[18] and their colleagues and has proven to be of some use in helping to understand, for

Administration and Society. 18(1987): 473-506.

[14] Peters, B. Guy, ed. Comparing Public Bureaucracies: Problems of Theory and Method. Tuscaloosa: University of Alabama Press, 1988. p. 8

[15] See Weber, Max. Economy and Society: An Outline of Interpretive Sociology. Berkeley: University of California Press, 1978 and Eisenstadt, S.E. The Political Systems of Empires,. London: Collier, 1963.

[16] See, for example, Waldo, Dwight. The Administrative State: A Study of the Political Theory of American Public Administration. New York: Ronald Press, 1948 and Barker, Ernest. The Development of Public Services in Western Europe 1660-1930. Oxford: Oxford University Press, 1944.

[17] See Knill, Christoph, "European Policies: The Impact of National Administrative Traditions." Journal of Public Policy 18, no. 1 (1998): 1-28; Christoph Knill, "Explaining Cross-National Variance in Administrative Reform: Autonomous versus Instrumental Bureaucracies," Journal of Public Policy 19, no. 2 (1999): 113-139; and Heritier, Adrienne, Christoph Knill, and Susanne Mingers. Ringing the Changes in Europe: Regulatory Competition and the Transformation of the State. Britain, France, Germany. Berlin: Walter de Gruyter, 1996.

[18] See Bekke, Hans, James L. Perry, and Theo Toonen. "Comparing Civil Service Systems." Research in Public Administration. 2(1993): 191-212; Bekke, Hans A.G.M., James L. Perry, and Theo A.J. Toonen, ed. Civil Service Systems in Comparative Perspective. Bloomington: Indiana University Press, 1996; Bekke, Hans A.G.M., James L.

example, the difficulties encountered in the European Union adopting EU-wide administrative initiatives. Both Knill and Bekke have suggested the critical importance of this concept in assessing the role played by existing administrative systems in affecting public policy processes and outcomes.

While useful, however, there are several problematic aspects of current uses of this concept. Two of the most important will be discussed in some detail below. These are:

1. The relationship between structure and process existing between a civil service system and an administrative style, or the question of the appropriate *unit of analysis* to use in developing and applying these concepts[19] and;

2. The question of the appropriate *level of analysis* to which these concepts can be applied.[20]

2.1. Units of Analysis: Institutional Arrangements and Their Effects on Administrative Behaviour

The concept of an administrative style needs to be unpacked in order to be of use in the study of administrative systems and their reform. This is because the term refers to two separate but intertwined units of analysis, one structural and the other behavioural. That is, with respect to the first issue, while the concept of an administrative style refers to the behaviour of administrative agents, it has a heavily structural or institutional component as it is assumed that these agents are not free-floating and unencumbered, but rather operate within an institutional context that at least in part determines their behaviour.

In this sense, the notion of an administrative style can be situated within the confines of a neo-institutional approach to the study of social and political life. While the exact contours of neo-institutionalism are an item of some disagreement across disciplines, with different variations existing within political science, economics and (historical) sociology,[21] these approaches share the common idea that rules, norms, and symbols affect political behaviour; that the organization of governmental institutions affect what the state does; and that unique patterns of historical development constrain future choices. [22] Institutions, hence, are defined to include not only formal organizations such as bureaucratic hierarchies

Perry, and Theo A.J. Toonen. "Introduction: Conceptualizing Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 1-12; Bekke, Hans A. G. M and Frits M. van der Meer, ed. Civil Service Systems in Western Europe. Cheltenham: Edward Elgar, 2000 and Bekke, Hans A. J. G. M. "Studying the Development and Transformation of Civil Service Systems: Processes of De-Institutionalization." Research in Public Administration. 5(1999): 1-18.

[19] Heady, Ferrel. "Configurations of Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 207-226.

[20] Peters, B. Guy. "Theory and Methodology." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 13-41.

[21] See Kato, Junko. "Review Article: Institutions and Rationality in Politics - Three Varieties of Neo-Institutionalists." British Journal of Political Science. 26(1996): 553-582 and Hall, Peter A. and Rosemary C. R. Taylor. "Political Science and the Three New Institutionalisms." Political Studies. 44(1996): 936-957.

[22] A useful definition of institutions used in this approach was put forward by Robert Keohane who described them as `persistent and connected sets of rules (formal or informal) that prescribe behavioural roles, constrain activity, and shape expectations'. Robert O. Keohane, International Institutions and State Power: Essays in International Relations Theory (Boulder: Westview Press, 1989): 163.

and market-like exchange networks but also legal and cultural codes and rules which affect the calculations by individuals and groups of their optimal strategies and courses of action.23

These assumptions focus this approach on the effects of structure on social actors and, as James March and Johan Olsen put it:

> They deemphasize the dependence of the polity on society in favor of an interdependence between relatively autonomous social and political institutions; they deemphasize the simple primacy of micro processes and efficient histories in favor of relatively complex processes and historical inefficiency; they deemphasize metaphors of choice and allocate outcomes in favor of other logics of action and the centrality of meaning and symbolic action.[24]

Hence the neo-institutional argument is not that institutions cause an action, but rather that they affect actions by shaping actors' interpretation of problems and possible solutions, by constraining the choice of solutions and by affecting the way and extent to which they can be implemented. While individuals, groups, classes, and states have their specific interests, they pursue them in the context of existing formal organizations and rules and norms that shape expectations and affect the possibilities of their realization.25

In the political realm, institutions are significant because they 'constitute and legitimize individual and collective political actors and provide them with consistent behavioural rules, conceptions of reality, standards of assessment, affective ties, and endowments, and thereby with a capacity for purposeful action'.[26] In an administrative context, as Morten Egeberg has noted:

> Formal organization provides an administrative milieu that focuses a decision-maker's attention on certain problems and solutions, while others are excluded from consideration. The structure thus constrains choices, but at the same time create and increases action capacity in certain directions. The organizational context surrounding individuals thus serves to simplify decisions that might otherwise have been complex and incomprehensible.[27]

Thus, as many observers have noted, the structure of administrative organizations affects administrative decision-making by facilitating the interpretation and re-construction of diverse situations into existing "frames", making them amenable to standardized decision-making processes such as the establishment of standard operating procedures, bureaucratic routines, or operational codes.[28] And the existence of

23 Ostrom, Elinor. "Institutional Rational Choice: As Assessment of the Institutional Analysis and Development Framework." In P. A. Sabatier, ed(s), Theories of the Policy Process, Boulder: Westview Press, 1999. 35-71.

24 James G. March and Johan P. Olsen, `The New Institutionalism: Organizational Factors in Political Life', American Political Science Review 78, 3 (1984): 738.

25 Williamson, Oliver W. Markets and Hierarchies. New York: Free Press, 1975.

26 March, James G. and Johan P. Olsen. `Institutional Perspectives on Political Institutions', Berlin: International Political Science Association (1994): 5

27 Egeberg, Morten. "The Impact of Bureaucratic Structure on Policy Making." Public Administration. 77, no. 1 (1999): 155-170. at page 159.

28 Allison, Graham T. and Morton H. Halperin. "Bureaucratic Politics: A Paradigm and Some Policy Implications."

institutionalized rules of behaviour affect calculations of actor's interests and self-interests by defining the nature of the "win-sets" which exist in given decisional circumstances, as well as the action channels these decisions will follow.[29] Together, these have an impact on the ideas that actors hold, as well as their assessments of what is feasible in a given situation.[30] This means, among other things, that such styles will be relatively long-lasting and quasi-permanent, an inference which is congruent with the neo-institutional idea of *path dependency*, whereby decisions are seen as layered upon each other, so that earlier decisions affect later ones and act as a further constraint on decision-makers' freedom of action.[31]

This suggests that the notion of an administrative style must be paired with a descriptor of an institutional order in order to fully identify the phenomenon being described.[32] This means that the idea of an administrative style, for example, goes hand-in-hand with such concepts as a "civil service system". As is discussed in the following section, this also implies that styles will exist at each distinct level of government organization.

2.2. Levels of Analysis: Departmental, Sectoral, National and Trans-National Administrative Styles

As Bekke, Perry and Toonen's work on civil service systems illustrates, an administrative style is best thought of as a set of administrative routines and behaviours heavily influenced by the rules and structures of the civil service system in which it is located. Very significant sets of rules and structures include macro-level ones such as the constitutional order establishing and empowering administrators, as well as more meso and micro-level ones affecting the patterns and methods of recruiting civil servants and

World Politics. 24, no. (Supplement) (1972): 40-79; Egeberg, Morten. "The Impact of Bureaucratic Structure on Policy Making." Public Administration. 77, no. 1 (1999): 155-170; George, Alexander L. "The "Operational Code": A Neglected Approach to the Study of Political Leaders and Decision-Making." International Studies Quarterly. 13(1969): 190-222.

[29] Hammond, Thomas H. and Jack H. Knott. "Political Institutions, Public Management, and Policy Choice." Journal of Public Administration Research and Theory. 9, no. 1 (1999): 33-85. See also Hammond, Thomas H. "Agenda Control, Organizational Structure, and Bureaucratic Politics." American Journal of Political Science. 30, no. 2 (1986): 379-420. More generally see Scharpf, Fritz W. "Games Real Actors Could Play: The Problem of Mutual Predictability." Rationality and Society. 2(1990): 471-494 and Scharpf, Fritz W. "Political Institutions, Decision Styles, and Policy Choices." In R. M. Czada and A. Windhoff-Heritier, ed(s), Political Choice: Institutions, Rules and the Limits of Rationality, Frankfurt: Campus Verlag, 1991. 53-86.

[30] On ideas and their impact see Campbell, John L. "Institutional Analysis and the Role of Ideas in Political Economy." Theory and Society. 27, no. 5 (1998): 377-409; and Hall, Peter A. "Policy Paradigms, Experts, and the State: The Case of Macroeconomic Policy-Making in Britain." In S. Brooks and A. G. Gagnon, ed(s), Social Scientists, Policy, and the State, New York: Praeger, 1990. 53-78. On calculations of feasibility see Huitt, Ralph K. "Political Feasibility." In A. Ranney, ed(s), Political Science and Public Policy, Chicago: Markham Publishing Co., 1968. 263-276; Majone, Giandomenico. "On the Notion of Political Feasibility." European Journal of Political Research. 3(1975): 259-274; and Meltsner, Arnold J. "Political Feasibility and Policy Analysis." Public Administration Review. 32(1972): 859-867.

[31] Pierson, Paul. "Increasing Returns, Path Dependence, and the Study of Politics." American Political Science Review. 94, no. 2 (2000): 251-267; Zysman, John. "How Institutions Create Historically Rooted Trajectories of Growth." Industrial and Corporate Change. 3, no. 1 (1994): 243-283 and Raadschelders, Jos C.N. and Mark R. Rutgers. "The Evolution of Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 67-99.

[32] Pierre, Jon. "Conclusions: A Framework of Comparative Public Administration." In J. Pierre, ed(s), Bureaucracy in the Modern State: An Introduction to Comparative Public Administration, Aldershot: Edward Elgar, 1995. 205-218

the nature of their interactions with eachother and with members of the public.[33] That is, not only are factors such as the nature of the political regime in which a system is located crucial to understanding their operation, but so too are more mundane items such as the open or closed nature of recruitment, the basis of selection as a career or program orientation, the nature of job evaluations and rank and pay considerations, as well as the presence or absence of opportunities for training and development.

However, this implies the existence of multiple types of administrative styles linked to (a) the different types of recruitment and management practices found in different systems and (b) the different levels or orders of government involved. That is, as John Zysman has argued, the institutional structure of an administration creates a distinct pattern of constraints and incentives for state and societal actors. These define and structure actor's interests and channel their behaviour, while the interaction of these actors generates a particular policy logic and process.[34] Since institutional structures are different, however, as a consequence, it is to be expected that there are many different kinds of administrative styles, each style being defined by the set of institutions, rules, traditions, and cultures of which it is comprised.

To a certain extent, as has been recognized by many authors, the two aspects of managerial style and orders of government overlap. That is, most systems are more or less centrally controlled through budgetary and personnel practices which exist on a system-wide level and for which some efforts are made to impose some degree of uniformity on system components. Hence a key question faced by the discussion of administrative styles is "what is the appropriate level of analysis to use when employing this term"? As Bekke et al noted in their path-breaking 1996 work:

> Although our definition refers to the state and the focus of this book is on national systems, it is not our intention to exclude other levels of government. We believe the logic and the analytic approaches can be extended to other government levels (…). One basic assumption of this approach is that civil service systems, whether national, subnational, or local, vary across political jurisdictions and that this variation merits study in its own right and for its implications for the management and development of these systems.[35]

What are these levels? A brief summary of the literature suggests four critical ones: the trans-national one, the national, the sectoral or policy level, and that of the Department or agency itself.

First, there is the trans-national level, in which national systems are seen merely as the offshoots of larger trans-national administrative traditions or cultures.[36] These distinct administrative cultures are

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[33] See Bekke, Hans, James L. Perry, and Theo Toonen. "Comparing Civil Service Systems." <u>Research in Public Administration</u>. 2(1993): 191-212. at page 195

[34] John Zysman, "How Institutions Create Historically Rooted Trajectories of Growth," <u>Industrial and Corporate Change</u> 3, no. 1 (1994): 243-283.

[35] Bekke, Hans A.G.M., James L. Perry, and Theo A.J. Toonen. "Introduction: Conceptualizing Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), <u>Civil Service Systems in Comparative Perspective</u>, Bloomington: Indiana University Press, 1996. 1-12 at page 4

[36] Dwivedi, O.P. and James Iain Gow. <u>From Bureaucracy to Public Management: The Administrative Culture of the Government of Canada</u>. Toronto: IPAC, 1999.

seen to have an impact on policy outcomes, which tend to follow the precepts of the administrative models from which they emerge.[37] As Rutgers has argued "it is important in this context that the concept of the state should not be equated simply with the nation state", but rather with a set of epistemologies and ontologies related to notions of what constitutes good and effective government.[38] Such analyses lead to the development of overall models of systems of administration much as is found in Figure 1 below.[39]

Figure 1 – A Model of Trans-National Administrative Styles

		Extent of Participation of State in Economy	
		High	**Low**
Means of Political Control of Administration	**Legislative**	*Non-Authoritarian Developing Nations e.g. East Asian NICS*	*Traditional Anglo-American and Continental European Systems*
	Party	*Socialist, Islamic and Authoritarian Systems*	*Transitional Democracies*

Across and within these categories, it has also been argued, administrators tend to develop specific national policy or regulatory styles.[40] As Christoph Knill has put it;

> The dimension of regulatory styles is defined by two related aspects: the mode of state intervention and administrative interest intermediation; i.e. patterns of interaction between administrative and societal actors. (These include) dimensions (such as) hierarchical versus self-regulation, as well as uniform and detailed requirements versus open regulation allowing for administrative flexibility and discretion. In the same way different patterns of interest intermediation can be identified, such as formal versus informal, legalistic versus pragmatic, and open versus closed relationships.[41]

This work carries on the tradition of earlier work on national policy styles such the "adversarial legalist" style by authors such as Robert Kagan and David Vogel in the U.S.[42] or the various types identified in Europe by Jeremy Richardson and his colleagues.[43] As Franz van Waarden has put it:

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[37] Castles, Francis G. "The Dynamics of Policy Change: What Happened to the English-speaking Nations in the 1980s." European Journal of Political Research. 18, no. 5 (1990): 491-513.

[38] Rutgers, Mark R. "Traditional Flavors? The Different Sentiments in European and American Administrative Thought." Administration and Society. 33, no. 2 (2001): 220-244. at page 239.

[39] For a similar analysis see Heady, Ferrel. "Configurations of Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 207-226.

[40] Eisner, Marc Allen. Regulatory Politics in Transition. Baltimore: John Hopkins University Press, 1993. Eisner, Marc Allen. "Discovering Patterns in Regulatory History: Continuity, Change and Regulatory Regimes." Journal of Policy History. 6, no. 2 (1994): 157-187 and Harris, Richard and Sidney Milkis. The Politics of Regulatory Change. New York: Oxford University Press, 1989.

[41] Knill, Christoph. "European Policies: The Impact of National Administrative Traditions." Journal of Public Policy. 18, no. 1 (1998): 1-28.

[42] See Robert A Kagan, "Adversarial Legalism and American Government," Journal of Policy Analysis and Management 10, no. 3 (1991): 369-406 and Robert A Kagan, "The Political Consequences of American Adversarial

National regulatory styles are formally rooted in nationally specific legal, political and administrative institutions and cultures. This foundation in a variety of state institutions should make regulatory styles resistant to change, and hence, from this perspective ones would expect differences in regulatory styles to persist, possibly even under the impact of economic and political internationalization.[44]

Figure 2 provides an example of such styles developed on the basis of the dimensions of the dominant approach to problem solving and the relationship existing between the government and society identified by Knill, and b others such as Richardson, Gustafsson and Jordan.

Figure 2. A Model of National Policy Styles

		Dominant Approach to Problem-Solving	
		Anticipatory	**Reactive**
Relationship Between Government and Society	**Consensus**	*German 'Rationalist Consensus' Style*	*British 'Negotiation' Style*
	Imposition	*French 'Concertation' Style*	*Dutch 'Negotiation and Conflict' Style*

Adapted from Jeremy Richardson, Gunnel Gustafsson, and Grant Jordan. 'The Concept of Policy Style' in <u>Policy Styles in Western Europe</u>, ed. J.J. Richardson. London: George Allen and Unwin, 1982.

Against both these views, however, there is also a literature which locates administrative styles at the sub-national level. Many policy studies, for example, have argued that if styles exist it is at the sectoral level, linked to common approaches used to address common problems such as health, education, and others,[45] where these approaches are seen to vary within a nation-state.[46] As Gary Freeman has argued, this approach:

assumes that each sector poses its own problems, sets its own constraints, and generates its own brand of conflict. There is room within this framework for considerable variation

Legalism." In A. Ranney, ed(s), <u>Courts and the Political Process</u>, Berkeley: Institute of Governmental Studies Press, 1996. See also Vogel, David. <u>National Styles of Regulation: Environmental Policy in Great Britain and the United States</u>. Ithaca: Cornell University Press, 1986.

[43] Richardson, Jeremy, Gunnel Gustafsson, and Grant Jordan. "The Concept of Policy Style." In J. J. Richardson, ed(s), <u>Policy Styles in Western Europe</u>, London: George Allen and Unwin, 1982. 1-16.

[44] van Waarden, Frans. "Persistence of National Policy Styles: A Study of Their Institutional Foundations." In B. Unger and F. van Waarden, ed(s), <u>Convergence or Diversity? Internationalization and Economic Policy Response</u>, Aldershot: Avebury, 1995. 333-372; at page 334

[45] Lowi, Theodore J. "Four Systems of Policy, Politics and Choice." <u>Public Administration Review</u>. 32, no. 4 (1972): 298-310. Salamon, Lester M. "Rethinking Public Management: Third-Party Government and the Changing Forms of Government Action." <u>Public Policy</u>. 29, no. 3 (1981): 255-275.

[46] Freeman, Gary P. "National Styles and Policy Sectors: Explaining Structured Variation." <u>Journal of Public Policy</u>. 5, no. 4 (1985): 467-496. Burstein, Paul. "Policy Domains: Organization, Culture and Policy Outcomes." <u>Annual Review of Sociology</u>. 17(1991): 327-350.

among nations in the way these are handled… we would be well advised to substitute a 'several policies, several countries' framework for the 'one country, several policies' mode commonly associated with the analysis of national styles."[47]

Discussions of the existence of distinct sectoral implementation styles are usually pitched at this level.[48] States must have a high level of administrative capacity and legitimacy in order to utilize a range of instruments in situations in which they wish to affect significant numbers of policy targets.[49] Hence, the existence and persistence of a specific implementation style is seen as being critically affected by the nature of the constraints under which policy-makers operate and type of target a policy is attempting to influence.[50] Figure 3 below provides an example of a model of such sectoral implementation styles based on the types of substantive and procedural policy instruments typically used by governments in many policy areas.

Figure 3. A Model of Sectoral Implementation Styles

Severity of State Constraints	Nature of the Policy Target	
	Large	**Small**
High	*Institutionalized Voluntarism* (Exhortation and Institutional Reorganization)	*Representative Legalism* (Regulation and Financial Manipulation)
Low	*Directed Subsidization* (Financial and Recognition Manipulation)	*Public Provision With Oversight* (Organization and Information Manipulation)

Adapted from Michael Howlett, "Policy Instruments and Implementation Styles: The Evolution of Instrument Choice in Canadian Environmental Policy." In D. L. VanNijnatten and R. Boardman, ed(s), Canadian Environmental Policy: Context and Cases, Toronto: Oxford University Press, 2002. 25-45.

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[47] Freeman, Gary P. "National Styles and Policy Sectors: Explaining Structured Variation." Journal of Public Policy. 5, no. 4 (1985): 467-496. at page 491-492.
[48] Howlett, Michael. "Policy Instruments and Implementation Styles: The Evolution of Instrument Choice in Canadian Environmental Policy." In D. L. VanNijnatten and R. Boardman, ed(s), Canadian Environmental Policy: Context and Cases, Toronto: Oxford University Press, 2002. 25-45 and Howlett, Michael. "Beyond Legalism? Policy Ideas, Implementation Styles and Emulation-Based Convergence in Canadian and U.S. Environmental Policy." Journal of Public Policy. 20, no. 3 (2000): 305-329.
[49] Howlett, Michael. "Managing the "Hollow State": Procedural Policy Instruments and Modern Governance." Canadian Public Administration. 43, no. 4 (2000): 412-431; Howlett, Michael and M. Ramesh. Studying Public Policy: Policy Cycles and Policy Subsystems. Toronto: Oxford University Press, 1995 and Suchman, Mark C. "Managing Legitimacy: Strategic and Institutional Approaches." Academy of Management Review. 20, no. 3 (1995): 571-610.
[50] Timonen, Virpi. "What Explains Public Service Restructuring? Evaluating Contending Explanations." Journal of European Public Policy. 8, no. 1 (2001): 43-59.

Finally, there is also a large literature which locates styles at the departmental or agency level. [51] This is the case, for example, with many studies which have identified specific enforcement styles used by different agencies in their day-to-day activities.[52] This literature asserts that neither the state nor the sector are suitable aggregate units of analysis but that both must be disaggregated to the specific agency level. As Smith, Marsh and Richards put it:

> The central state is not a unified actor but a range of institutions and actors with disparate interests and varying resources… we need to examine how different departments behave and how various decisions within departments are made. Policy process will vary according to the department/agency that is analyzed and hence there is a need for comparative research across both sectors and states.[53]

John Scholz has provided a basic model of department enforcement styles based on the strategies employed by regulators and regulatees as they go about their respective businesses.

Figure 4. A Model of Agency Enforcement Styles

<table>
<tr><td></td><td colspan="3" align="center">Agency Approach to Enforcement</td></tr>
<tr><td></td><td></td><td>**Legalistic**</td><td>**Negotiative**</td></tr>
<tr><td rowspan="2">Client Attitude Towards Enforcement</td><td>**Positive**</td><td>*Traditional Bureacratic Enforcement Style*</td><td>*Collaborative Enforcement Style*</td></tr>
<tr><td>**Negative**</td><td>*Contested Litigious Enforcement Style*</td><td>*Ineffective Enforcement Style*</td></tr>
</table>

Adapted from Scholz, John T. "Cooperation, Deterrence, and the Ecology of Regulatory Enforcement." Law and Society Review. 18, no. 2 (1984): 179-224.

2.3. Overcoming Multiple Units and Levels of Analysis in the Study of Administrative Styles

There are, of course, different ways to interpret the existence and persistence of these different analyses of administrative styles. However, *prima facie*, it would appear to be logical to assume that (1)

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[51] Richardson, J.J., A.G. Jordan, and R.H. Kimber. "Lobbying, Administrative Reform and Policy Styles: The Case of Land Drainage." Political Studies. 26, no. 1 (1978): 47-64.

[52] Hawkins, Keith and John M. Thomas. "Making Policy in Regulatory Bureaucracies." In K. Hawkins and J. M. Thomas, ed(s), Making Regulatory Policy, Pittsburgh: University of Pittsburgh Press, 1989. 3-30. See also Scholz, John T. "Cooperation, Deterrence, and the Ecology of Regulatory Enforcement." Law and Society Review. 18, no. 2 (1984): 179-224 and Scholz, John T. "Cooperative Regulatory Enforcement and the Politics of Administrative Effectiveness." American Political Science Review. 85, no. 1 (1991): 115-136.

[53] Smith, Martin J., David Marsh, and David Richards. "Central Government Departments and the Policy Process." Public Administration. 71(1993): 567-594 at page 580

styles are composed of both sets of institutions and behaviours and (2) they parallel the institutional structure of society. That is, that there are multiple administrative styles which exist in a nested relationship to eachother. This general conception of multi-level administrative styles is set out in Figure 5 below.

Figure 5 – A Multi-Layered Concept of an Administrative Styles

Level of Analysis	Components of a Style		Elements of an Overall Administrative Style
	Institutional Structure	**Administrative Behaviour**	
Trans-National	Weberian Monocratic Bureaucracy	Civil Service Traditions	Trans-National Administrative Culture
National	Civil Service System	Regulatory Style	National Administrative Tradition
Sectoral	Policy Regime	Policy Style	Sectoral Implementation Style
Agency	Departmental Structure	Departmental Culture	Agency Enforcement Style

3. The Dynamics of Administrative Styles: Understanding Change in Administrative Systems and Processes

The preceding discussion points out the need to deal with questions of administrative styles in a nuanced and multi-faceted way. However it also shows that a workable model of administrative styles can be derived by viewing them in a neo-institutional light. Conceiving of an overall administrative style as a nested combination of institutional structures and administrative behaviours existing at multiple levels of analysis makes the concept more complex than many initially envisioned, but also more precise and easier to apply in specific circumstances. In dealing with questions of civil service reform, however, one must move beyond a static depiction of administrative styles towards a more dynamic model which can address questions such as "how do administrative styles change" and "what are the factors responsible for those changes"?

In order to address these questions, it is first necessary to develop a concept of what constitutes successful administrative reform. Without such a definition, as Guy Peters has argued "it appears that any administrative reform can work, and equally, any reform can fail, given the particular set of circumstances within which it is attempted".[54] In this context, using the multi-layered concept of an administrative style developed above is helpful. *That is, it would be expected that administrative reform means the alteration of either the fundamental institutional basis of an administrative style, or of the characteristic patterns of behavior of which it is also comprised.* And the extent of reform will clearly vary from the relatively minor alterations of agency specific enforcement styles to overarching trans-national administrative cultures.

What then causes changes in these key dimensions of administrative styles? An examination of the literature in these areas points to several key factors.

3.1. Factors Affecting Alterations in Administrative Styles

With respect to trans-national administrative cultures, most of the literature points to the impact of large-scale geo-historical developments such as wars, conquests, and colonization which directly brought about changes in the institutional structures of administration in many countries, as well as the slower and less direct diffusion of administrative ideas from one tradition to another.[55] Such studies tend to see, for example, significant differences between continental European and "Anglo-American" administrative traditions and institutions, and focus on the processes of colonization and de-colonization which have seen these institutions disseminated through North America, Asia, Africa, Australia and Latin America.[56]

At the level of national administrative traditions, authors point to the significance of factors such as the social composition of administrative elites, perceptions of the legitimacy of governments and states held by their populations, self-perceptions of professionalism and engagement held by civil servants

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[54] Peters, B. Guy. "What Works? The Antiphons of Administrative Reform." In B. G. Peters and D. J. Savoie, ed(s), Taking Stock: Assessing Public Sector Reforms, Montreal: McGill-Queen's Press, 1998. 78-107. at page 78

[55] See for example, Welch, Eric W. and Wilson Wong. "Effects of Global Pressures on Public Bureaucracy: Modeling a New Theoretical Framework." Administration and Society. 33, no. 4 (2001): 371-402 and Farazmand, Ali. "Globalization and Public Administration." Public Administration Review. 59, no. 6 (1999): 509-522. For a more skeptical view see Castles, Francis G. "On the Political Economy of Recent Public Sector Development." Journal of European Social Policy. 11, no. 3 (2001): 195-211.

[56] See Hanson, Mark. "Organizational Bureaucracy in Latin America and the Legacy of Spanish Colonialism." Journal of Inter-American Studies and World Affairs. 16, no. 2 (1974): 199-219; Burke, Fred G. "Public Administration in Africa: The Legacy of Inherited Colonial Institutions." Journal of Comparative Administration. 1, no. 3 (1969): 345-378; and Wunder, Bernd. "Le Modele Napoleonien d'Administration: Apercu Comparatif." In B. Wunder, ed(s), The Influences of the Napoleonic "Model" of Administration on the Administrative Organization of Other Countries, Brussels: International Institute of Administrative Sciences, 1995. More generally see Finer, S.E. The History of Government From the Earliest Times - Volume III: Empires, Monarchies and the Modern State. Oxford: Oxford University Press, 1997 esp. Chapter 7 "The Transplantation of European State-Models, 1500-1715 and Subramaniam, V. Transplanted Indo-British Administration. New Delhi: Ashish Publishing House, 1977. On recent examples of this phenonomenon see Hesse, Joachim Jens. "Rebuilding the State: Public Sector Reform in Central and Eastern Europe." In J.-E. Lane, ed(s), Public Sector Reform: Rationale, Trends and Problems, London: Sage, 1997. 114-145 and Gabrielian, Vitche and Frank Fischer. "Reforming Eastern European bureaucracy; Does the American Experience Apply?" In H. K. Asmerom and E. P. Reis, ed(s), Democratization and Bureaucratic Neutrality, London: Macmillan, 1996. 109-126.

themselves, and the constitutional structure of government. Key factors and processes affecting change, hence, include alterations in the secular or religious nature of the society in question, alteration in educational systems or political power underlying merit and patronage systems of appointment, alterations in levels of public sector unionism or professionalism, and any shift in fundamental governing arrangements arising from foreign war, revolution, civil war or other means.[57] Observers have also noted the manner in which adherence to new regional or trans-national governance arrangements – such as the European Union – can affect elements of these national traditions,[58] and the manner in which propensities and capacities for learning at the national level affect the disposition to alter structures and behaviour on the basis of lessons derived from other jurisdictions.[59]

At the level of implementation styles, attention has been focused on the stabilizing effects of existing institutional structures and the manner in which changes at the sectoral level have been the result of alterations in variables such as the organizational culture of the concerned agencies and the nature of their links with clients and other agencies. The context of the problem situation, its timing and the scope of actors it includes, were also cited as having significant potential impacts on choices.[60]

Finally, there is the question of enforcement styles at the agency level. Here, as many observers have noted, decisions on the use of coercion, persuasion, negotiation, or legal recourse are often made on the basis of managerial preferences as well as experiences in the field on the part of enforcement personnel.[61] However the nature of the structures which exist to monitor and enforce compliance are also significant.[62] Alterations in the mandates and instructions provided by agencies, turn-over in personnel, and ideas about regulatory behaviour have all been found to be significant elements affecting the type of enforcement style found in an agency.[63]

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[57] Bekke, Hans A. J. G. M. "Studying the Development and Transformation of Civil Service Systems: Processes of De-Institutionalization." Research in Public Administration. 5(1999): 1-18 and Raadschelders, Jos C.N. and Mark R. Rutgers. "The Evolution of Civil Service Systems." In H. A. G. M. Bekke, J. L. Perry and T. A. J. Toonen, ed(s), Civil Service Systems in Comparative Perspective, Bloomington: Indiana University Press, 1996. 67-99.

[58] See Cowles, Maria Green, James Caporaso, and Thomas Risse, ed. Transforming Europe: Europeanization and Domestic Change. Ithaca: Cornell University Press, 2001; Heritier, Adrienne, Christoph Knill, and Susanne Mingers. Ringing the Changes in Europe: Regulatory Competition and the Transformation of the State. Britain, France, Germany. Berlin: Walter de Gruyter, 1996; Heritier, Adrienne. "Market Integration and Social Cohesion: The Politics of Public Services in European Regulation." Journal of European Public Policy. 8, no. 5 (2001): 825-852 and Knill, Christoph. "European Policies: The Impact of National Administrative Traditions." Journal of Public Policy. 18, no. 1 (1998): 1-28.

[59] See Olsen, Johan P. and B. Guy Peters, ed. Lessons From Experience: Experiential Learning in Administrative Reforms in Eight Democracies. Oslo: Scandinavian University Press, 1996.

[60] Linder, Stephen H. and B. Guy Peters. "Instruments of Government: Perceptions and Contexts"." Journal of Public Policy. 9, no. 1 (1989): 35-58 and Bressers, Hans Th. A. and Laurence J. O'Toole. "The Selection of Policy Instruments: A Network-based Perspective." Journal of Public Policy. 18, no. 3 (1998): 213-239.

[61] Gormley, William T. "Regulatory Enforcement." Political Research Quarterly. 51, no. 2 (1998): 363-383 and Hawkins, Keith. Environment and Enforcement: Regulation and the Social Definition of Pollution. Oxford: Clarendon Press, 1984.

[62] McCubbins, Arthur Lupia and Mathew D. "Learning from Oversight: Fire Alarms and Policy Patrols Reconstructed." Journal of Law, Economics and Organization. 10, no. 1 (1994): 96-125 and McCubbins, Mathew D. and Thomas Schwartz. "Congressional Oversight Overlooked: Policy Patrols Versus Fire Alarms." American Journal of Political Science. 28, no. 1 (1984): 165-179.

[63] May, Peter and Raymond J. Burby. "Making Sense Out of Regulatory Enforcement." Law and Policy. 20, no. 2 (1998): 157-182 and May, Peter J. and Soren Winter. "Regulatory Enforcement and Compliance: Examining Danish Agro-Environmental Policy." Journal of Policy Analysis and Management. 18, no. 4 (1999): 625-651.

The overall situation described above is set out in Figure 6 below.

Figure 6 – Factors Affecting Different Levels of Administrative Styles

Level of Administrative Style	Factors Responsible for Change in Administrative Styles
Trans-National Administrative Culture	*War* *Conquest or Colonization* *Diffusion of ideas and structures from other traditions*
National Administrative Tradition	*Alterations in:* ** resources available to, and size of, government agencies and/or* ** popular and elite views of roles and responsibilities of public servants*
Sectoral Implementation Style	*Alterations in:* ** subsystem complexity and/or* ** administrative capacity affecting choices of governing instruments*
Agency Enforcement Style	*Government Re-organizations* *Alterations in:* **mandates* ** incentive systems and/or* ** management practices*

4. Conclusion: Implications for the Study of Public Administration Reform

This discussion, of course, begs the question of whether there are overall patterns in the direction of the alterations which occur in administrative styles. Generally speaking, most of the literature on political convergence has tended to focus on questions of policy outcomes, rather than that of administrative styles, *per se*, and few discussions of this topic exist.[64] Nevertheless, as was stated at the outset of this paper, a pattern of trans-national convergence in administrative styles has been alleged by organizations such as the OECD and by proponents of New Public Management philosophy, and has also been observed independently by students of particular sectoral and other arrangements.[65] However, as was

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[64] Bennett, Colin J. "What is Policy Convergence and What Causes It?" British Journal of Political Science. 21, no. 2 (1991): 215-233 and Unger, Brigitte and Frans van Waarden. "Introduction: An Interdisciplinary Approach to Convergence." In B. Unger and F. van Waarden, ed(s), Convergence or Diversity? Internationalization and Economic Policy Response, Aldershot: Avebury, 1995. 1-35.
[65] Howlett, Michael. "Beyond Legalism? Policy Ideas, Implementation Styles and Emulation-Based Convergence in

also pointed out above, all of these studies have observed not only patterns of convergence but also those of considerable divergence in their subject areas.[66]

A neo-institutional model of administrative styles as set out in this paper helps to explain these findings. That is, a mixed pattern of convergence and divergence is explicable if one considers the nested nature of the different types of administrative styles identified above. Since each of the lower levels of institutional orders is located within a higher level, each level serves to "filter" or mediate the effects of changes at higher levels; moderating the impact of any changes which occur at those levels. Thus, for example, the impact of "global" changes such as the diffusion of new ideas about appropriate state-society relations will be moderated by existing implementation styles, meaning managerial practices at the department or agency level may or may not be affected substantially by those developments.[67] Similarly, changes which occur independently at lower levels will not necessarily impact on higher levels at all.[68]

Applying such an analysis to any country is, of course, a nuanced and complex task. Disaggregating the concept of an administrative style and undertaking analysis at multiple levels, however, provides a useful methodology for such studies. The nested nature of styles means little can be assumed, *a priori*, about the effects of individual causal factors on the nature of the interactions occurring between styles at different levels. However careful case studies and empirical evaluations can allow specific conclusions to be drawn about the nature of these processes in different circumstances and the manner in which reform efforts must be at least minimally compatible with important aspects of existing styles if they are to have any chance of success.[69]

Canadian and U.S. Environmental Policy." Journal of Public Policy. 20, no. 3 (2000): 305-329; Galanter, Marc. "Legality and Its Discontents: A Preliminary Assessment of Current Theories of Legalization and Delegalization." In E. Blankenburg, E. Klausa and H. Rottleuthner, ed(s), Alternative Rechtsforen und Alternativen Zum Recht, Bonn: Westdeutscher Verlag, 1980. 11-26 and Kahler, Miles. "Conclusion: Causes and Consequences of Legalization." International Organization. 54, no. 3 (2000): 661-683.

[66] On the various possible arrangements of similarities and differences in comparative studies see Seeliger, Robert. "Conceptualizing and Researching Policy Convergence." Policy Studies Journal. 24, no. 2 (1996): 287-310.

[67] This is a very common finding, for example, in terms of the actual impact of New Public Management thinking "on the ground". See Welch, Eric W. and Wilson Wong. "Effects of Global Pressures on Public Bureaucracy: Modeling a New Theoretical Framework." Administration and Society. 33, no. 4 (2001): 371-402; Knill, Christoph. "Explaining Cross-National Variance in Administrative Reform: Autonomous versus Instrumental Bureaucracies." Journal of Public Policy. 19, no. 2 (1999): 113-139; Pollitt, Christopher. "Clarifying Convergence: Striking Similarities and Durable Differences in Public Management Reform." Public Management Review. 4, no. 1 (2001): 471-492; and Bennett, Colin J. "Understanding Ripple Effects: The Cross-National Adoption of Policy Instruments for Bureaucratic Accountability." Governance. 10, no. 3 (1997): 213-233.

[68] Coleman, William D. and Wyn p. Grant. "Policy Convergence and Policy Feedback: Agricultural Finance Policies in a Globalizaing Era." European Journal of Political Research. 34(1998): 225-247 and Hills, Jill and Maria Michalis. "Restructuring Regulation: Technological Convergence and European Telecommunications and Broadcasting Markets." Review of International Political economy. 7, no. 3 (2000): 434-464.

[69] For good examples of studies undertaken in this vein see Borins, Sandford. "Public Management Innovation in Economically Advanced and Developing Countries." International Review of Administrative Sciences. 67(2001): 715-731 and Lindquist, Evert, ed. Government Restructuring and Career Public Services. Toronto: Institute of Public Administration of Canada, 2000. On this final point see Peled, Alan. "Why Style Matters: A Comparison of Two Administrative Reform Initiatives in the Israeli Public Sector, 1989-1998." Journal of Public Administration Research and Theory. 12, no. 2 (2002): 217-240.