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To cite this article: Kees Huizinga & Martin de Bree (2021): Exploring the Risk of Goal Displacement in Regulatory Enforcement Agencies: A Goal-Ambiguity Approach, Public Performance & Management Review, DOI: [10.1080/15309576.2021.1881801](https://doi.org/10.1080/15309576.2021.1881801)

To link to this article: <https://doi.org/10.1080/15309576.2021.1881801>



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Published online: 17 Feb 2021.



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Exploring the Risk of Goal Displacement in Regulatory Enforcement Agencies: A Goal-Ambiguity Approach

Kees Huizinga and Martin de Bree 

Erasmus University Rotterdam

ABSTRACT

It is generally believed that public agencies are especially prone to goal displacement, but research has remained relatively limited. In this conceptual paper, we explore why and how goal displacement might affect public regulatory enforcement agencies. Central to our approach is an analysis of the ambiguity of enforcement goals, arguing that the ambiguity related to the evaluation of goal achievement makes enforcement agencies vulnerable for goal displacement. The underlying reason is that this type of ambiguity increases the risk of neglecting the complexities of enforcement goals. We specify three types of complexity neglect and describe their potential goal-displacement effects. We provide examples of goal-displacement-reinforcing factors to clarify conceptual notions. We conclude that in the absence of a sound tradition of ex-post effect evaluations, goal displacement might be much more prevalent in enforcement agencies than is often assumed.

KEYWORDS

enforcement goals; goal ambiguity; goal displacement; goal integrity; regulatory enforcement

Introduction

Goal displacement, as originally defined by Michels in 1911, is the phenomenon by which the original and often radical or idealistic goals of an organization are displaced by the inferior goals required to maintain the organization and keep its leadership in power (Michels, 1949; Slattery, 2003). Whereas most early studies focused on this shift of goals to organizational survival, more recent studies have included a broader spectrum of changes, including general shifts in goals as well as shifts in their relative importance (Abramson, 2009). A common characteristic is that the original goals are formally preserved, but the actual goals pursued are not necessarily the same.

Goal displacement has been demonstrated in widely varying organizational settings, including political organizations (Bongyu, 2003; Kerr, 1975; Lipset, 1950), government agencies and services (Bengtsson, 2003; Elliott &

CONTACT Martin de Bree  mbree@rsm.nl  Rotterdam School of Management, Erasmus University Rotterdam, PO Box 1738, 3000DR Rotterdam, The Netherlands.

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States, 1979; Jentoft et al., 2011; Resh & Marvel, 2012; Selznick, 1949; Uitermark & Loopmans, 2013), health and elderly care organizations (Abramson, 2009; Scheff, 1962; Scott, 1967; Topliss, 1974), schools (Aviram, 1990; Bohte & Meier, 2000), research (Kerr, 1975; Meier & Calderon, 2016), software development (Fitzgerald, 1996), newspapers (Harlow, 2015), and even gangs (Elder, 1999). Goal displacement will generally influence the effectiveness of organizations negatively, as confirmed by empirical research (Abramson, 2009; Bohte & Meier, 2000; Resh & Marvel, 2012).

The risk of goal displacement may be especially high in public agencies. The reason, according to Bohte and Meier (2000), is that these agencies are often charged with complex societal problems. Consequently, performance in relation to solving or mitigating these problems may prove difficult to evaluate. This may lead to performance evaluations based on outputs rather than outcomes, accompanied by a risk of goal displacement. More generally, scholars discussing goal displacement in bureaucratic organizations have related this phenomenon to goal characteristics such as abstraction, intangibility, and ambiguity (e.g., Blau, 1963; Bohte & Meier, 2000; Merton, 1957).

Since the early 1990s, goal ambiguity has been conceptually and empirically explored. Organizational goal ambiguity is defined by Chun and Rainey (2005a, p. 2) as “the extent to which an organizational goal or set of goals allows leeway for interpretation, when the organizational goal represents the desired future state of the organization.” Empirical research based on Rainey’s Rainey (1993) theory of goal ambiguity in public organizations points to negative influences of goal ambiguity on effectiveness at the organizational level (Chun & Rainey, 2005b; Jung, 2011), programmatic level (Jung, 2014), and the individual level (Stazyk & Goerdel, 2011). The results of this research correspond with research within the framework of goal-setting theory, showing that when goals are specific and reasonably difficult, employee motivation and performance increase (Locke & Latham, 2002). In the goal-ambiguity literature, goal displacement is often mentioned in some way as a natural response to goal ambiguity. For example, Rainey and Jung (2015, p. 74) mention goal displacement as a risk related to the translation of higher goals into objectives and rules. However, goal displacement has largely remained peripheral to the work on goal ambiguity.

In this paper, we seek to increase our understanding of the relation between goal displacement and goal ambiguity in public organizations. More specifically, this paper explores why and how goal displacement affects the ability of regulatory enforcement agencies to enforce the rules, based on an analysis of goal ambiguities characterizing these agencies’ goals.¹ Regulatory enforcement is defined as “all activities of state structures (or structures) delegated by the state aimed at promoting compliance and

reaching regulations' outcomes" (OECD, 2014, p. 11). These outcomes include lowering risks to safety, health, and the environment and ensuring the achievement of public goods, such as state revenue collection or transparent functioning of markets. Regulatory enforcement agencies' activities include information, guidance and prevention, data collection and analysis, inspections and enforcement actions in the narrower sense, such as warnings, improvement notices, fines and prosecutions. We focus here on agencies exclusively entrusted with enforcement and on the enforcement activities of agencies entrusted with several phases of the regulatory process, such as rule-making, enforcement, and evaluation.

Regulatory enforcement agencies play a pivotal role in making legislation "work" (Gunningham, 2011). At first sight, their goals may seem to be relatively straightforward: the compliance of regulated organizations with a set of regulatory requirements that constitute the agency's jurisdiction. Therefore, the risk of goal displacement appears to be limited. However, upon a closer look, ambiguities emerge that characterize these goals. Regulatory enforcement agencies must translate often vague and ambiguous policy goals in order to apply them to real-world situations, regularly under the influence of competing stakeholders (Bardach, 1977; Wilson, 1989). As emerges from the literature, such translation processes are particularly interesting from the point of view of goal displacement (Abramson, 2009; Bohte & Meier, 2000; Warner & Havens, 1968).

We focus on goal displacement affecting the organization as a whole, or major parts of it, such as organizational units or programs, taking the official organizational goals as a reference. We do not consider differences in goals at the level of individuals or groups of individuals within the organization although we are aware of the possible relevance of these issues, as asserted by Downs (1967) for example. Moreover, we take a generalized approach to regulatory enforcement. While we realize the risks of such an approach considering the degree of variation between enforcement agencies, we are confident that the basic similarity in their goals, that is, compliance of regulated organizations with a set of regulatory requirements covered by the agency, provides a sufficient basis for a generalized approach.

Below, we first consider the role of evaluative goal ambiguity in creating a vulnerability to goal displacement (Section "Evaluative goal ambiguity, grip factors & the risk of goal displacement"). Subsequently, we analyze how goal-displacement effects can be related to three major constitutive processes underlying enforcement activities (Sections "Priority goal-ambiguity neglect in scope selection," "Directive goal-ambiguity neglect in compliance perception," and "Means-to-goal-subordination neglect in means specification").

Evaluative goal ambiguity, grip factors and the risk of goal displacement

Relevance of evaluative goal ambiguity

Evaluative goal ambiguity refers to the level of interpretative leeway that an organization mission allows in evaluating progress toward the achievement of the mission (Chun & Rainey, 2005a). Its measure looks at whether the goals and performance measures were stated in terms of results and impacts, as opposed to inputs, processes, and outputs. More specifically, evaluative goal ambiguity can be measured by expressing the number of subjective and workload-oriented performance indicators as a percentage of all performance indicators, including those which are considered objective or results-oriented. If this percentage is high, the evaluative goal ambiguity is high (Chun & Rainey, 2005a).

In the case of regulatory enforcement, evaluative goal ambiguity can be linked to the difficulty of measuring the effects of enforcement activities in an objective and results-oriented way and therefore their contribution to goal achievement. The main reason for the difficulty in observing effects pertains to an important characteristic of the goals of many regulatory domains, which is their intangibility. According to Warner and Havens (1968, p. 540), intangible goals are “expressions of intended states of affairs that do not adequately describe the desired states or the activities that would constitute their achievement.” The intangibility of regulatory enforcement goals is a direct consequence of the fact that protective regulation is often focused on reducing risks that are elusive and volatile in character. This makes it difficult to draft regulatory requirements that are simple and concrete yet effectively induce a substantial reduction of those risks. As Bardach and Kagan (2010, p. 70) note: “Ironically, it is this very elusiveness of bad actions or outcomes that give rise to protective regulation in the first place: if the harmful attributes of a product or a work were easier to detect, consumers or workers would be able to protect themselves.” Thus, the changes sought by enforcement agencies are reductions of risks that are often not directly perceptible and therefore not directly measurable, such as highly intangible occupational health risks due to hazardous substances or the external safety risks of chemical plants.

Although high degrees of intangibility may be typical for many regulatory domains, in others, goals can be relatively tangible. For example, the goal sought by specific requirements to curb noise hindrance can certainly be measured. Similarly, requirements of fall protection for construction workers prescribe clearly visible measures, such as fences and the use of scaffolds and safety lines that contribute to a readily perceptible goal: minimizing the number of casualties of falls. Nevertheless, even in these domains, the changes in desired behavior are difficult to observe. Concluding that enduring changes

have been implemented based on infrequent and short inspections is a standard extrapolation that may not be representative of the actual situation. Thus, although some enforcement goals offer greater opportunities for measurement than others, a base level of intangibility seems to be inherent to the enforcement goals of all regulatory domains.

An additional factor contributing to the evaluative ambiguity of enforcement goals is that many influences may be involved in achieving the goals of reducing risks. These may include influences from other government agencies and external interest groups, and internal pressures within regulated organizations themselves. Therefore, it may be hard to extract the exact contribution of enforcement efforts (Coglianese & Snyder Benneer, 2005).

In sum, as enforcement goals are generally intangible, and realization efforts are influenced by a network of actors, evaluative goal ambiguity appears to be a relevant characteristic of these goals.

Relying on grip factors, goal-complexity neglect, and the risk of goal displacement

Despite the lack of direct empirical guidance, an organization striving to achieve intangible goals has the task of steering toward these goals by means of organizational action, and it is expected to be able to account for the effects of its actions. This means that the organization must infer organizational activities from these intangible goals in order to get a grip on these intangible goals. We introduce the term grip factors which is an acronym for Goal Realization Indicators and Proxies. Grip factors are indicators and proxies the organization selects to make a vague goal more tangible in order to operationalize it. Examples of grip factors are measurable outputs such as inspection numbers and violation numbers. Large accidents in the domain covered by the agency can also serve as grip factors because of the concreteness of the events themselves and the upheaval they may cause (see also Section “Indications for goal narrowing in terms of scope”).

The risk associated with these grip factors is that they may be poorly aligned with the original goals. In that case, their use will lead to goal displacement. This is not a marginal risk, as the very reason for relying on grip factors in the first place—that is, the intangibility of goals—also hinders the empirical evaluation of the grip factors applied. Consequently, the greater the intangibility of goals associated with a regulatory domain, the more it will preclude any direct distinction between well and poorly directed grip factors. As no clear warning signals will accompany the use of the latter, goal displacement may take place relatively unnoticed and unhindered, reinforced by overconfidence in the quality of the grip factors used.

Previous literature has identified the intangibility of goals as an important factor contributing to goal displacement. While the number of

empirical studies of goal displacement in public agencies remains limited, those available identify the intangibility of organizational goals as a major contributing factor of goal displacement (Abramson, 2009; Bohte & Meier, 2000; Resh & Marvel, 2012).

Obviously, the risk of goal displacement might be substantially mitigated in the case that feedback is available from retrospective effect evaluations of enforcement strategies and methods, that is, indirect evaluative guidance. Such evaluations generally provide insights into how to increase effectiveness. These insights may include optimizations of orientation on the original goals without even explicitly recognizing the phenomenon of goal displacement as such, specifically by designing and using a set of grip factors that is better aligned with the original goals. Unfortunately, retrospective effect evaluations of enforcement strategies and methods are relatively scarce. To date, no substantial base of knowledge of effect evaluations has been established. Several authors have decried this lack of retrospective evaluation of regulations and consequently recommended the establishment of a strong tradition of such evaluations (Greenstone, 2009; Sunstein, 2014). However, establishing such a tradition should take care to avoid specific shortcomings as pointed out by Bull (2014). Evaluations carried out by the agency itself can be inadequate due to tunnel vision, invertedness, and inadequacy of resources. In addition, evaluations carried out by permanent regulatory boards may specifically lack a nuanced understanding. In order to evade these shortcomings, this scholar has proposed a retrospective tradition based on rule-making petitions which seek to integrate the expertise of nongovernmental entities.

In the absence of a substantial base of retrospective effect evaluations, the risk of goal displacement may be substantially increased by internal and external pressures to select and use relatively simple grip factors to specify goals and means. Such pressures may be exerted by sanctioning and rewarding systems. Regulatory enforcement agencies, like all organizations, use internal sanctions and rewarding mechanisms to “obtain desired behavior from individuals” (Warner & Havens, 1968, p. 550) within the agency. However, sanctions and rewarding mechanisms generally tend to simplify: “what is sanctioned tends to be what can be evaluated, and what can be evaluated tends to be what is visible, tangible, and measurable” (Warner & Havens, 1968, p. 550). Thus, the less these sanctions coincide with the goals, the stronger the goal-displacement-reinforcing effect. Kerr (1975) attributes goal displacement due to rewarding mechanisms to a general fascination with simple, quantifiable criteria, as these characteristics are perceived as objective. According to this scholar (1975, pp. 779–780), such criteria “may be successful in highly predictable areas within an organization, but are likely the cause of goal displacement when applied anywhere

else.” An additional factor Kerr mentions is the general tendency to over-emphasize highly visible behaviors: rewarding the stimulation of visible parts may lead to other less visible, but nonetheless indispensable, parts being neglected. Among the examples provided is the focus of university teachers on research and publications at the expense of teaching, as the former is much more visible and therefore more suitable for rewarding policies than the latter. Empirical studies of goal displacement in public agencies confirm the goal-displacement-inducing effects of sanctions and rewards (Abramson, 2009; Bohte & Meier, 2000).

Importantly, the simplifying effect of sanctioning and rewarding pressures, which may run counter to the goal ambiguities, tends to be a rewarding strategy in itself. As simplifications enable the agency to operate along production-like, streamlined processes, they may contribute to stakeholder perceptions of a smoothly operating agency. The latter will positively contribute to the organization’s legitimacy (Bromley & Powell, 2012), thereby strengthening simplification tendencies. In contrast, resisting the deduction of a highly production-like and streamlined set of tasks in order to reflect the ambiguity of goals may lead stakeholders to perceive the resulting enforcement processes as overly complicated (see also Section “Means-to-goal-subordination neglect in means specification”).

Thus, the risk associated with the use of grip factors guiding goal realization efforts is that these factors do not fully take into account the full complexity of enforcement goals and are therefore directed at simplified goals. We further refer to this phenomenon as goal complexity neglect. Specifically, we assert that higher degrees of goal complexity neglect associated to the grip factors used will generally lead to a higher risk of goal displacement. The preceding discussion can be summarized by the following propositions.

Proposition 1: The greater the evaluative goal ambiguity pertaining to a regulatory domain, the greater the risk of a lack of reliable effects feedback on enforcement activities in that domain.

Proposition 2: The greater the lack of reliable effects feedback on enforcement activities, the greater the risk of neglecting the complexity of enforcement goals.

Proposition 3: The greater the neglect of regulatory enforcement goal complexity, the greater the risk of goal displacement.

Processes potentially affected by goal-complexity neglect

After having elaborated why regulatory enforcement agencies tend to be vulnerable to goal displacement, we now focus on the question concerning how this may translate into actual goal-displacement effects. To this aim, we distinguish three major processes underlying and characterizing the

enforcement activities as conducted by a regulatory enforcement agency. These processes are scope selection, compliance perception, and means specification. The first process refers to the capacity allocations made by the agency that determine the scope of activities. It “fits” the general goals of the agency as set by its mandate within the limits of the resources available to the agency. The second process refers to the translation of regulatory requirements to specific situations at regulated organizations. It specifies what should be done to be in compliance with regulatory requirements. Both scope selection and compliance perception result in specifying the goals: they translate the general goal as set by the mandate into working goals of individual enforcement projects or programs. The third process refers to picking suitable means such as labor, tools and methods to achieve these working goals.

Although these three processes may often be lumped together, the distinction made above may be quite useful for our exploration of goal-displacement effects based on goal ambiguity.² As we will explain, scope selection relates to priority goal ambiguity, whereas compliance perception relates to directive goal ambiguity, both involving leeway in specifying the goal and thus adding to the complexity of goals. In addition, means specification involves the handling of the methodological leeway in terms of input, such as the techniques to be used, in terms of throughput, specifically the enforcement procedures to be applied, and in terms of the output to be generated, such as inspection numbers.

Thus, we distinguish three types of complexity, each corresponding to a major process underlying enforcement activities, which have to be dealt with in designing and conducting enforcement activities. In the following three sections, we seek to make plausible that substantial neglect of these complexities, mediated by grip factors as discussed above, may lead to specific goal-displacement effects. In the case of both scope selection and compliance perception, either goal-narrowing or goal-widening effects may result, whereas, in the case of means specification, goal diversion to means may be generated. [Figure 1](#) summarizes the proposed relations between goal ambiguity and goal displacement.

Priority goal-ambiguity neglect in scope selection

The relevance of priority goal ambiguity

Priority goal ambiguity refers to the level of interpretative leeway in deciding on priorities among multiple goals (Chun & Rainey, 2005a). The measure of priority goal ambiguity or the degree of imprecision in indicating priorities among multiple goals includes the number of long-term strategic goals and the number of annual performance targets. In order to interpret

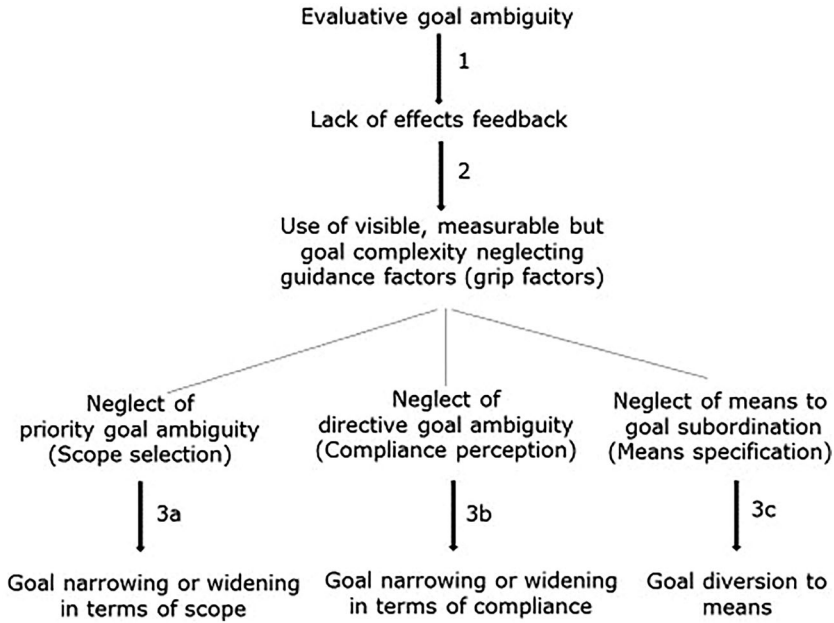


Figure 1. Goal ambiguity-based framework for goal displacement in regulatory enforcement agencies. The numbers refer to the propositions throughout this paper.

the relevance of priority goal ambiguity in the case of regulatory enforcement goals, we first take a closer look at these goals.

The overall goal of an enforcement agency is constituted by the regulatory mandate attributed to these agencies. It may cover one or several subdomains. An example of the latter is the US Occupational Health and Safety Authority (OHSA), which includes the subdomains of occupational health and of safety. Each of these subdomains includes a specific regulatory framework consisting of laws and regulations. Completely unfolded, the goal of each regulatory enforcement agency is a grid of micro goals. One dimension of this grid includes all regulatory requirements within a regulatory domain covered by the enforcement agency. For example, an environmental enforcement agency must conduct compliance inspections not only on permit conditions like waste storage and noise but also on several legal requirements such as soil contamination. The other dimension of the micro-goal grid includes the regulated organizations. A specific regulatory requirement must be adhered to by a population of regulated organizations usually specified in the regulations. Thus, the overall goal of regulatory enforcement is the sum of all micro goals contained within the grid, that is, compliance with each requirement within the agency's mandate by every regulated and relevant organization.

Because of the limited capacities of enforcement agencies and the usually large number of micro goals included in the mandate, the agency must

allocate capacities to those micro goals considered most relevant; that is, the agency must engage in scope selection. The grid structure just discussed facilitates numerous ways of allocating enforcement capacity over these micro goals. Thus, a fundamental interpretative leeway is presented to the agency, which has to be translated into strategic goals and annual targets.

To make things even more complicated, the micro-goal grid is generally not static but rather may exhibit considerable inconstancy over time. First, the regulatory framework may formally change due to the addition of new regulations or the withdrawal of regulations from the total set of regulations covered by the agency. The framework may also formally change, owing to fluctuations within the population of regulated organizations due to startups, closures, and removals. These changes affect the overall goal of the agency, interpreted as the sum of all micro goals. Second, even with the absence of official changes over time, internal changes within the framework may take place as compliance levels fluctuate due to autonomous or enforced compliance efforts at the regulated organizations. On the one hand, some of the micro goals within the grid may be attained within a certain period due to compliance efforts. These may therefore no longer be considered as part of the goal, or at least be attributed a much lower priority. On the other hand, some of the micro goals already attained may present diminished compliance levels. These should again be considered as part of the goal or be given greater priority. In more general terms, fluctuations in compliance levels necessitate a frequent recalibration of the goal, in which the perceived risks are usually considered.

In sum, as enforcement goals consist of a dynamic grid of micro goals, priority goal ambiguity, as interpreted above in the case of regulatory enforcement goals, appears to be a relevant characteristic.

Priority goal-ambiguity neglect and the risk of goal displacement in terms of scope

Goal displacement implies a substantial deviation from goal alignment. In the case of regulatory enforcement scope selection, the latter can be considered as a prioritizing of a micro goal which, considered over multiple years and summed over a considerable number of enforcement activities, is perceived as optimally representing the overall goal as set by the mandate. Obviously, the complexity of the task of prioritizing increases as the number and variation of public interests covered by the agency increases. This complexity also increases as the heterogeneity of regulated organizations covered increases.

Apart from the size, complexity, and dynamics of the micro-goal grid, interpretations and convictions of what an optimal goal alignment in terms of scope

would look like may differ. Several questions arise. Should it primarily be based on risk analyses, or should a judicial perspective, emphasizing the relevance of all regulations, dominate? Should new regulations be given more attention than older ones? In fact, different scope selections may be considered as an optimal goal alignment in terms of scope, depending on the criteria used.

That being said, extreme scope selections can be identified that so clearly and substantially deviate from goal alignment that they can be considered as goal displacement. These are specifically goal narrowing and goal widening in terms of scope. Goal narrowing in terms of scope refers to a situation in which the available enforcement capacity is allocated to a small number of micro goals, involving in-depth inspections, thereby structurally neglecting a substantial part of other micro goals within the micro-goal grid. Thus, an underinclusive set of tasks within the agency's jurisdiction is acted upon. Goal narrowing in terms of scope can be interpreted as an overstretch of the leeway inherent in priority goal ambiguity, leading to a break-up of the goal in a usually small part usurping all attention and a large fragment being neglected to a great extent. An example is when an environmental inspection agency is putting emphasis on a subset of safety regulations regarding tank storage of flammable bulk liquids after several newspaper articles about flaws in the safety management in one of the companies in that industry.

In contrast, goal widening in terms of scope can be defined as a situation in which the goal enforcement agency insufficiently performs the task of identifying irrelevant micro goals within the scope, and thus conducts superfluous inspections. In other words, an overinclusive set of tasks within the jurisdiction is acted upon. Goal widening in terms of scope can be interpreted as a freezing of the leeway inherent in priority goal ambiguity in such a way that all micro goals are attributed equal priority.

What both types of goal displacement have in common is that they reflect a gross neglect of priority goal ambiguity. Instead of a dynamic balancing of depth and breadth of scope selections based on the mandate, a highly imbalanced approach is taken. This leads to the following proposition.

Proposition 3a: The greater the neglect of priority goal ambiguity in designing and conducting enforcement activities, the greater the risk of goal narrowing or widening in terms of scope.

Below, we consider indications for the existence of either narrowing or widening effects in multigoal government agencies before considering indications for the occurrence of these effects in regulatory enforcement agencies.

Indications for goal narrowing in terms of scope

The literature provides indications of goal-narrowing effects in multigoal government agencies that can be considered the result of priority goal-ambiguity neglect. Biber (2009, p. 1) asserts that “[a]gencies will systematically underperform on goals that are hard to measure and that conflict with the achievement of other, more measurable goals.” Gilad (2015) points out how, in two cases of precrisis financial regulatory agencies, public pressures effectuated a narrowing among the multiple tasks and goals of these agencies. Extensive data on US agencies analyzed by Carrigan (2012, 2018) support the conventional wisdom that agencies forced to balance more programs are less apt to achieve their goals. Conflicting goals are pointed out as a major determinant undermining performance. Finally, Lee (2016) focuses on narrowing effects due to a strong adherence to the core mission of a regulatory agency. This scholar (2016, p. 20) asserts that if an agency is ordered to strictly follow its core mission, and thus “commended for focusing on only a subset of regulatory objectives, then there will be classes of problems that will go unaddressed.” While these studies, with the exception of Gilad (2015), do not specifically include regulatory enforcement, they provide indications for the relation between priority goal-ambiguity and goal-narrowing effects in terms of scope. Moreover, all authors relate these narrowing effects, referred to as underaddressing or underperforming, to either the preference of visible, measurable goals over goals that lack these characteristics or the preference of goals for which a salient external pressure is felt. This means that the agencies considered are susceptible to tangibles in directing their course, which seems to confirm our discussion of grip factors.

Indications for goal narrowing in terms of scope in regulatory enforcement agencies reflect two distinct grip factors. The first is the occurrence of large accidents or calamities related to the regulatory domain covered by enforcement agencies. These negative events can lead to incisive course changes at regulatory enforcement agencies. The degree of accident sensitivity of agencies may be higher for regulatory domains that cover highly salient risks such as food safety, major hazards, and construction (Carrigan & Coglianese, 2012). Despite their undesirability, major accidents and calamities offer opportunities to infer concrete organizational activities because the goal of the agency (or at least part of it) becomes tangible. More specifically, these events offer opportunities to identify neglected areas or problems and thus increase performance. As such they usually serve as powerful grip factors, although in a negative way. The resulting agenda disruption may be especially severe in the case of agencies characterized by centralized authority and informal procedures (May et al., 2007). The risk inherent in these unwanted events is that the agency strongly

focuses on a relatively small subset of regulatory requirements associated with the accident or calamity. Such a strong focus which may hold on for weeks, months, or even years leads to the neglect of other parts of the scope. This can be interpreted as goal narrowing in terms of scope. Empirical research on goal displacement in regulatory enforcement agencies confirms that large accidents and calamities may lead to long-lasting, incisive goal-narrowing effects (Huizinga, 2020). More generally, indications for goal narrowing effects in the aftermath of such negative events can be found in the literature, although the explicit term goal narrowing is not used. An example is provided by the disaster that took place in 2000 in a fireworks warehouse in the Dutch city of Enschede. This disaster caused the deaths of twenty-two people. In this case, the use of illegal storage containers and trade in illegal fireworks were identified as the main causes of this explosion. This event leads to a massive concentration of enforcement efforts directed at fireworks warehouses in the following years (Mascini, 2005).

There is a widespread consensus among scholars that the political and societal expectations of regulation have increased in recent decades. This is expressed very clearly after major accidents and calamities, which have become less accepted and have caused increased public upheaval (Carrigan & Coglianese, 2012). A common denominator in the aftermath of these negative events is the diagnosis by major stakeholders that public enforcement agencies failed to protect public interests. This implies that the goal is increasingly perceived in a negative way as the complete absence of such events within the regulatory domain, which in turn implies that zero risks are expected to be attained by the enforcement agency. Based on this expectation, major accidents or calamities are perceived by stakeholders as indicators of a clearly suboptimal goal alignment of the agency that could have been avoided. Sanctioning measures such as the replacement of top management may follow.³

A second example of a grip factor that may induce goal narrowing in terms of scope is provided by the main instrument used nowadays to guide scope selection: risk analysis. Generally, high-quality risk analyses may help to find a balance in capacity allocation by allocating relatively great capacity to micro goals designated as high risk and relatively limited capacity to micro goals designated as low risk (Gunningham, 2011; Sparrow, 2000). As such, they can be considered as instruments to handle priority goal ambiguity in a rational, goal-oriented way. As convincingly pointed out by Tombs and Whyte (2013), however, they may lead to “intelligence deficits.” By focusing on those parts of the mandate considered high risk, enforcement agencies may gradually lose sight of the remaining parts as the number of inspections in these areas will be substantially reduced or even stop. In this way, a gradual locking-in on a small part of the mandate may be

brought about by risk analyses, which has been confirmed by empirical research on goal displacement in enforcement agencies (Huizinga, 2020).

Indications for goal widening in terms of scope

No indications for the occurrence of this type of goal displacement in government agencies were encountered in the literature. Its relevance is probably limited to agencies covering large numbers of micro goals as is the case for regulatory enforcement agencies. An example of a grip factor potentially inducing goal widening in terms of scope in regulatory enforcement agencies is a “cover-to-cover” approach in terms of the mandate, pursuing the complete regulatory framework without any significant risk-based prioritization. Such an approach covering the full scope may include micro goals, which from a perspective of risks, are irrelevant and may even lead to counterproductive effects when inspected. This can be clarified as follows. Although regulatory requirements are designed for complete branches of activities, in practice they usually focus on those regulated organizations that are relatively far removed from effective risk reduction measures (Bardach & Kagan, 2010). In practice, substantial numbers of regulated organizations within a sector may have already completely and structurally integrated the reduction of the risks desired in the regulations, probably even before their entry into force, and therefore they have a low likelihood of relapse. As Bardach and Kagan (2010, p. 67) assert with respect to nursing homes: “Detailed regulations designed to prevent the worst operators from cutting corners also apply to the good homes.” Consequently, inspections carried out at these so-called front runners will burden those organizations with administrative and organizational tasks that have no added value or even have a counterproductive effect as resources must be redirected to these regulatory tasks. Carrying out irrelevant and therefore superfluous inspections can be considered as goal widening in terms of scope: the scope as perceived is wider than necessary, as it includes regulated organizations that in terms of risk reduction actually comply. The goal based on a qualitatively solid risk assessment would be smaller, as it would at least temporarily leave out these organizations. Empirical research indicates that traditional enforcement agencies without or with underdeveloped risk analyses may be prone to this goal-displacement effect (Huizinga, 2020).

Directive goal-ambiguity neglect in compliance perception

The relevance of directive goal ambiguity

Directive goal ambiguity refers to the amount of interpretative leeway available in translating an organization’s mission or general goals into directives

and guidelines for specific actions to be taken to accomplish the mission (Chun & Rainey, 2005a). The measure of directive goal ambiguity uses a “rules-to-laws” ratio, the ratio of the number of pages of administrative rules written in the Code of Federal Regulations for an agency to the number of pages of legislation that the agency administers (Rainey & Jung, 2015). If the former is large in comparison to the latter, the agency has been given a broad mandate, and the agency has filled in the mandate with many more rules.

As we focus on regulatory enforcement in this paper, we propose a specific operationalization of directive goal ambiguity for this activity. We do so by linking the “leeway to translate goals into directives and guidelines for specific action” to the compliance perceptions applied during enforcement activities. Compliance perceptions refer to the enforcement professional’s explicit mental picture in advance of the actual inspections of what full compliance with regulatory requirements should look like. Compliance perceptions guide the translation of regulatory requirements, which usually target large numbers of organizations, to the specific settings of individual regulated organizations. They facilitate the question concerning what should be done by a specific regulated organization to fulfill specific regulatory requirements. Compliance perceptions may comprise strict, black-letter interpretations, more permissive stances allowing compliance solutions “in-the-spirit-of-the law, as well as intermediate positions”.

In an ideal situation, with clear and feasible requirements covering a highly homogeneous set of regulated organizations, this translation will be relatively straightforward for both the regulated organization and the enforcer. Such clear-cut practice is, however, rarely the case. First, regulatory requirements may prove difficult to interpret or are vague in character, such as performance-based regulations (May, 2003). Second, the regulated organizations are often heterogeneous in terms of size, activities, technical characteristics, and location (Bardach & Kagan, 2010; Oded, 2013). This implies that a situation of optimal goal attainment, interpreted as the implementation of a requirement that produces a maximum outcome in terms of effectiveness and efficiency, may vary between regulated organizations.

In enforcement practice, specifications regarding how to interpret regulatory requirements in regulated organizations may be prescribed prior to the enforcement activities. The number of such prescriptions may increase with increasing vagueness of regulations on the one hand and increasing heterogeneity of regulated organizations on the other. For example, in the case of heterogeneity of regulated organizations within an industrial sector, such as the chemical industry, subcategories may be distinguished for each of which compliance is specified. As such, these prescriptions may be a

measure of this dimension of ambiguity, which is consonant with the measure proposed by Rainey and Chun (2014).

In sum, as enforcement goals consist of general requirements that have to be translated to generally highly variable individual situations, directive goal ambiguity, interpreted as compliance specification leeway, appears to be a relevant characteristic of these goals.

Directive goal-ambiguity neglect and the risk of goal displacement in terms of compliance

Goal alignment in terms of compliance can be considered as an interpretation of compliance with regulatory requirements at regulated organizations that is perceived as optimally representing the overall goal set by the mandate. As discussed above, the complexity of this task intensifies with increasing complexity and abstraction of regulatory requirements and with increasing differences among regulated organizations. Apart from these factors, interpretations and convictions of what an optimal goal alignment in terms of compliance would look like may differ (Oded, 2013).

Nevertheless, extreme allocations may be identified that so clearly and substantially deviate from goal alignment that they can be considered as goal displacement. These are specifically goal narrowing and goal widening in terms of compliance. Goal narrowing in terms of compliance refers to situations in which an underinclusive approach to compliance is taken. It is characterized by a complete inelasticity of interpreting regulatory requirements. Such a compliance approach emphasizing a very strict interpretation of regulatory requirements by enforcers may severely limit alternative options of compliance and therefore hinder the optimal implementation of the regulatory requirements in terms of effectiveness and efficiency.

In contrast, goal widening in terms of compliance refers to situations in which an overinclusive approach to compliance is taken. It is characterized by a high elasticity of interpreting regulatory requirements. The risk associated with such a situation is that the enforcement agency applies such a stretched-out interpretation of compliance with regulatory requirements that the dividing line between compliance and noncompliance disappears, impeding an unequivocal and uniform judgment of compliance. For example, the Dutch Authority for Consumers and Markets drastically changed its course from a strictly regulation-based to a problem-based approach (Schäfer & Houdijk, 2012). As this approach led to a significant decrease of successful enforcement procedures and performance indicators measuring the degree of competitiveness, it was abandoned just a few years later (Huizinga, 2020).

Both goal narrowing and goal widening can be considered as extremely one-sided modes of handling a fundamental tension associated with compliance perception. May (2003, p. 387) points to this tension in a paper describing the pitfalls of performance regulation as follows: “The objectives of flexibility and innovation are at odds with those of consistency, equity, and predictability. [...] Underlying these potential conflicts is a fundamental tension between discretion and control that regulatory authorities must confront when carrying out regulations.”

What both types of goal displacement have in common is that they both reflect a gross neglect of directive goal ambiguity. Instead of a case-to-case balancing of strictness and flexibility, both situations of goal displacement reflect a completely imbalanced approach. This leads to the following proposition.

Proposition 3b: The greater the neglect of directive goal ambiguity in designing and conducting enforcement activities, the greater the risk of goal narrowing or widening in terms of compliance.

Below, we consider indications for the occurrence of these effects in government agencies in regulatory enforcement agencies.

Indications for goal narrowing in terms of compliance

An example of a grip factor potentially inducing goal narrowing in terms of compliance is “letter-of-the-law” interpretation of regulatory requirements (Oded, 2013). The regulatory requirements are tangible: they have been written down in official texts that have a legal status. This may stimulate the conviction that the regulatory requirements, interpreted literally, are the perfect and unmistakable descriptions of the goals of these guidelines and therefore offer grip. Such an approach to compliance, also known as a “going-by-the-book” approach (Bardach & Kagan, 2010), will largely avoid an interpretational stance in the “spirit of the law,” which would otherwise imply a certain degree of flexibility of interpretation, introducing uncertainty for the enforcer, as every situation must be judged based on its specific characteristics and context, often requiring dialog with the regulated organization. In contrast, a literal interpretation provides an indisputable reference and is thus deemed better-suited for a “command-and-control” stance of regulatory enforcement; however, it may severely restrict the options available to regulated organizations. For example, a regulatory requirement prescribing a specific polluting emissions reduction technique X may prove difficult to integrate at a plant. The plant manager thus proposes technique Y, which is even more effective in terms of emissions reduction, but it is ultimately rejected for not being the prescribed one. Such a strict, narrowing enforcement style may result in several

negative effects such as weakening intrinsic motivation to comply, discouragement, and “cat-and-mouse” effects (Bardach & Kagan, 2010; Gunningham, 2011; Oded, 2013).

Indications for goal widening in terms of compliance

An example of a grip factor potentially inducing goal widening in terms of compliance is the regulatory burden as experienced by regulated organizations. As the regulatory burden is far more tangible and measurable in comparison to the outcomes of enforcement, it can make stakeholders rely on the regulatory burden as a main evaluative proxy of the quality of enforcement activities. It can be expressed quantitatively in terms of costs, such as working time spent by personnel of the regulated organization to prepare, conduct, and follow up on inspections, as well as the costs of investments and the costs of legal procedures. Moreover, it can be expressed qualitatively in terms of the quality of enforcement officers as experienced by regulated organizations, such as professional know-how and competences. For example, in the Netherlands in the period 2005–2010, the regulatory burden and specifically the enforcement burden as experienced within all major industrial sectors and other sectors, such as healthcare institutions, was measured. This was done primarily to establish a reference for efforts directed at reducing these burdens (Inspectieraad, 2009).

A strong stakeholder focus on minimizing the regulatory burden can lead to the conviction that only an enforcement style with a minimal burden on the regulated organizations should be considered effective and efficient. It is deemed to be something that can and should be avoided as much as possible rather than as something that is inherently linked to enforcement. This reflects a neoliberal vision of the enforcement as a partnership between the agency and regulated organizations (Mascini, 2013) instead of a “cat-and-mouse” relationship characteristic of deterrence-based enforcement (Oded, 2013). It is strongly based on the normative principle that (at least the vast majority of) regulated organizations have to be classified as law-abiding, meaning that they are motivated to obey regulations based on a sense of social responsibility (Gunningham, 2011; Oded, 2013; Mascini, 2013).

Still, a highly cooperative style may lead to a risk of goal widening in terms of compliance in the sense that the goals have become vaguer: the line between compliance and noncompliance may disappear. Moreover, this style is associated with several negative effects such as a decreased credulousness, regulatory capture, and a “wait-and-see” attitude (Gunningham, 2011; Oded, 2013), factors that may contribute to goal-widening effects.

Alternative regulatory approaches and the risk of goal displacement

Obviously, scholarship has considered various alternative regulatory instruments beyond traditional “command-and-control” and cooperative approaches. Such alternatives include information disclosure (e.g., Coglianesi et al., 2004; Karkkainen, 2001), management-based regulation (e.g., Coglianesi & Lazer, 2003; Gilad, 2010), market-based instruments (e.g., Stavins, 2003) and voluntary approaches (e.g., Benneer & Coglianesi, 2012; Potoski & Prakash, 2005). Related to these developments, regulatory enforcement styles have been diversified (Kagan, 1989; Scholz, 1984). More generally, the insight has grown that a variety of factors determine which instruments and which styles are most appropriate in particular regulatory environments. High-quality knowledge of regulated organizations, such as knowledge pertaining to their motivation to comply and their economic outlooks may help to select an optimal, balanced approach to compliance perception and subsequent enforcement procedures (Saurwein, 2011).

As it is beyond the scope of this paper to consider the vulnerabilities to goal displacement of each of these approaches, what can be anticipated is that they will tend to be greater the more that directive goal ambiguity, as defined above, will be neglected. Such neglect may be associated with implementation-related shortcomings. Consequently, the often-implicit purpose of evading both an overly strict “command-and control” or overly permissive cooperative enforcement stance may fall short. We consider two examples, responsive regulation and flexible approaches, such as management-based regulation. The former aims at a better-informed approach to compliance (Ayres & Braithwaite, 1992; Braithwaite, 2002), following a “tit-for-tat” strategy along the well-known pyramid of sanctions. It will emphasize enforceability in the case of regulated organizations unwilling to comply and flexibility in the case of law-abiding organizations. As such, it may in principle be less vulnerable to the types of goal displacement outlined above; however, as far as there is a lack of responsiveness due to superficial and infrequent inspections, this strategy may lead to suboptimal compliance judgements and therefore suboptimal enforcement styles (Nielsen & Parker, 2009; Oded, 2013). As a result, groups of regulated organizations may be approached much more strictly than necessary and vice versa, leading to goal narrowing or goal widening respectively.

In the case of flexible approaches such as management-based regulation and voluntary approaches, generally less grip is available to the enforcer compared to approaches based on detailed, prescriptive requirements. Regulatory flexibility inevitably shifts the task of what needs to be done by the regulated organization in order to comply from the regulators, the public servants designing and writing the regulations, to the enforcers. Flexibilization tendencies consequently confront the enforcer with a more

vague, abstract, and less enforceable task (Bennear & Coglianese, 2012; Coglianese & Nash, 2016; Gilad, 2010). Therefore, the implementation may require well-trained enforcers, adequate benchmarking, and the will to enforce, if necessary. Otherwise, the risk of goal widening due to overpermissiveness in terms of compliance may be substantial.

Means-to-goal-subordination neglect in means specification

Means-to-goal-subordination neglect and the risk of goal diversion to means

The specification of means refers to the elaboration of methods of compliance inspection and methods of enforcement in the case of detection of noncompliance to be used in an enforcement project or program. It results in a sequence of input, specifying personnel, organization structure and techniques, throughput, specifying enforcement procedures, and output, specifying the direct results of those activities to be generated. Just as there are several roads leading to Rome, several methodological pathways may be well aligned with the specified goal of an enforcement project. Thus, means specification involves navigating the methodological leeway related to specified goal. A variety of factors, such as the availability of resources, the agency's culture, traditions, and workforce composition to name a few, will influence the process of means specification.

In contrast to regulatory enforcement goals which are generally intangible, the means applied to realize those goals, such as a specific technique applied, an enforcement procedure to be followed, or a specific number of inspections to be generated, are visible and measurable. Consequently, they may be used as grip factors. According to Wilson (1989), organizations that have observable outputs, but unobservable outcomes will tend to be "means-oriented." They typically focus on standard operating procedures, accounting for why this author refers to them as "procedural organizations." The use of such standard operating procedures offers the managers of these organizations better opportunities to address the accountability of their organizations relative to a goal-oriented focus: "How the operators go about their job is more important than whether doing these jobs produce the desired outcomes" (Wilson, 1989, p. 164). Although the development of professionalism in such agencies would appear to be desirable, this is rare. According to Wilson (1989, p. 164), this is because "a government agency cannot afford to allow its operators to exercise discretion when the outcome of that exercise is in doubt or likely to be controversial." This author classifies the US Occupational Health and Safety Administration (OHSAS) as a procedural organization. As many regulatory enforcement agencies are characterized by observable outputs and unobservable outcomes as discussed in Section "Evaluative goal ambiguity, grip factors &

the risk of goal displacement,” it is highly likely that they have a centralized, procedural managerial inclination.

The risk inherent in the dominance of such a strong means-orientedness is a gradual weakening of the subordinate position of the means with respect to goals, up to the point where means become independent from them. In such cases, the optimization of means no longer serves the original organizational goals but rather the means themselves. This implies that the means have become a goal in themselves. Many of the phenomena described in the literature as goal displacement represent this reversal of goals and means (Warner & Havens, 1968). It is referred to here as goal diversion to means. This phenomenon has also been described as decoupling (Bromley & Powell, 2012; de Bree & Stoopendaal, 2020).

In the case of regulatory enforcement, a strong focus on means implies that the enforcer is expected to strictly follow a highly uniform sequence of input-throughput-output and consequently can exert only limited professional discretion. In enforcement practice, however, different situations may require different means to optimize inspection and enforcement results. For example, an enforcer may decide to use an alternative measurement technique in cases where the one prescribed cannot be optimally applied. Thus, a certain level of professional discretion must be considered necessary to maximize goal attainment. In contrast, high levels of standardization of inspection and enforcement procedures may lead to suboptimal goal attainment as they imperfectly reflect the complexity and dynamics of the goals. In that case, the means can be characterized as overformalized (Van der Walle, 2014). The focus on formalization leads to a neglect of the means-to-goals subordination; consequently, the means are directed at a diverted, yet simplified goal.⁴

The foregoing discussion leads to the following proposition.

Proposition 3c: The greater the neglect of subordination of means to goals in designing and conducting enforcement activities, the greater the risk of goal diversion to means.

As means can be subdivided into input, throughput, and output, three subtypes of goal displacement to means can be distinguished.

Indications for goal diversion to means

In this subsection, we elaborate upon how the intrinsic tendency of means-orientedness and therefore the risk of goal diversion to means has been strengthened by the very influential trend of new public management (NPM) in the past three to four decades. The main objectives of NPM are output management and budget cuts (Van der Walle, 2014; Van Thiel &

Leeuw, 2003). Implementing these objectives will, according to its proponents, lead to optimized agencies as they increasingly operate in a “production-like” mode, weeding out any perceived organizational redundancy.

Output management

The negative effects of output management applied to public agencies have been extensively discussed in the literature (e.g., Bromley & Powell, 2012; Smith, 1995; Wilson, 1989). Specifically, in relation to goal displacement, Abramson (2009, p. 68) states that “since there are strong incentives for producing measurable outputs rather than intangible outcomes, organizations focus on goals that facilitate outputs, displacing the original (and often more intangible) goals.” Whereas the performance of private corporations is relatively easy to evaluate given their central goal of profit-making, the performance of public agencies is more difficult because they have multiple (social, political, economic) bottom lines, rendering it almost impossible to develop simple quantitative measures of performance. It is this complexity that makes public agencies vulnerable to goal displacement in case of a strong direction toward output management (Bohte & Meier, 2000).

Like all public agencies in the Western world, regulatory enforcement agencies have had to cope with NPM in recent decades. Considering the evaluative goal ambiguity discussed in the previous sections, no simple one-to-one correspondence between outputs and outcomes will generally be available. This means that the more strongly a “one-size-fits-all” type of output management is exercised at regulatory enforcement agencies, the greater the risk will be of the actual goals sought being diverted from the original goals. Moreover, as outputs are streamlined, this will generally have an effect, in the sense of streamlining throughputs, specifically the standardization of procedures as well as inputs including certain techniques.

Interestingly, the regulatory literature highlights negative effects of one-size-fits-all approaches by enforcement agencies, whether for inputs such as intervention strategies (Gunningham, 2011) and techniques (Perez, 2014), for throughputs, especially procedures (Bardach & Kagan, 2010; Van der Walle, 2014), and for outputs such as inspection numbers, violation numbers, violation records, and numbers of criminal prosecutions and penalties (Oded, 2013; Terpstra & Trommel, 2009), and audit scores (Blewett & O’Keeffe, 2011). The latter authors explicitly mention goal displacement, while a number of the others use wordings that allude to goal displacement. For example, Perez (2014) refers to autonomization and locking-in effects in relation to the use of techniques by regulatory agencies.

From these studies, one tends to conclude that high levels of standardization of means should be a warning signal of goal diversion to means.

Empirical research appears to confirm goal diversion effects related to the use of means as grip factors mentioned in the literature (Huizinga, 2020). This study also points to a preoccupation with organizational reform, which can also be considered as a goal diversion to means, specifically inputs, and has been described in more general terms in the literature (Bromley & Powell, 2012; de Bree & Stoopendaal, 2020).

Budget cuts

The second main characteristic of NPM pertains to budget cuts. Budget cuts are mentioned as goal-displacement-reinforcing influences in the literature. For instance, Sieber (1981) distinguishes two forms of goal displacement through budget cuts. The first occurs via the abandonment of costly procedures that were designed to ensure the accomplishment of goals, that is, “less efficient but more effective means are replaced by more efficient but less effective means” (Sieber, 1981, p. 116). Consequently, goal achievement can be seriously jeopardized. The second form of goal displacement is when the organization, feeling the need to demonstrate its indispensability, takes refuge in “a great flurry of activity in predetermined modes” (Sieber, 1981, p. 116). According to this author, this is especially apparent “when the measurement of ultimate goal achievement is difficult or subject to dispute” (Sieber, 1981, p. 116). Empirical research provides evidence for the goal-displacement-reinforcing effects of organizational budget cuts (Abramson, 2009; Bohte & Meier, 2000).

Regulatory enforcement agencies in the Western world have been subject to budget cuts for several decades under the influence of NPM and more general references to greater responsibilities of free enterprises and self-regulation (Tombs & Whyte, 2013). In the Netherlands, the Scientific Council for Government Policy warns that while budget cuts can accelerate innovation within regulatory enforcement agencies, the consequences in terms of effectiveness remain underexamined. As the Council writes (Wetenschappelijke Raad voor het Regeringsbeleid [WRR], 2013, p. 101), “pressed by budget cuts and financial targets, a hype surrounding innovations seems to have been developed, sometimes assuming without evidence that these are not only cheaper and administratively less burdensome, but just as effective.”

It should be stressed that budget cuts at highly bureaucratic agencies can give the right incentives to reformations, resulting in more effective and efficient agencies. However, a continuous pressure consisting of severe and frequent budget cuts over a series of decades will lead to situations far beyond the optimizations desired. Instead, it will lead to “stripped” agencies

producing numbers but poor outcomes (Tombs & Whyte, 2013) and therefore function as a powerful goal-diversion-to-means-reinforcing factor.

It is important to note that the goal-displacement effect of budget cuts may extend beyond goal diversion to means. In addition, it may lead to goal narrowing in terms of scope as white spots within the mandate arise because of lacking capacity, mediated by the grip factor of risk analysis (Section “Priority goal-ambiguity neglect in scope selection”). Moreover, goal widening in terms of compliance may result as more flexible regulations and more flexible enforcement styles are introduced. The reason is that the latter are expected to lead to reduced enforcement efforts, mediated by the grip factor of the enforcement burden (Section “Directive goal-ambiguity neglect in compliance perception”). Empirical research appears to confirm the risk of multiple goal-displacement effects (Huizinga, 2020).

Conclusions and implications

In this paper we have sought to increase the understanding of why and how goal displacement might affect the effectiveness of regulatory enforcement agencies. The main scientific implication of our exploration is that the risk of goal displacement appears to be deeply ingrained in these agencies as it is intricately linked to the evaluative ambiguity of their goals. This dimension of ambiguity, which is characteristic for many regulatory domains, not only forces the agencies to rely on visible, measurable guiding factors to direct their activities but simultaneously increases the risk that these grip factors grossly neglect the complexities inherent to enforcement goals.

We have analyzed such complexity neglect in three major processes underlying enforcement activities: scope selection, which is related to priority goal ambiguity of enforcement goals, compliance perception, which is related to directive goal ambiguity of enforcement goals, and finally means specification. In addition, we have shown how each of these processes can induce specific goal-displacement effects due to complexity neglect mediated by grip factors dominating these processes. These grip factors have been summarized in [Table 1](#).

Given the scarcity of retrospective effect evaluations pertaining to regulatory enforcement approaches, our exploration indicates that goal displacement may be much more prevalent than expected. Whereas regulatory enforcement agencies are often considered as being charged with straightforward tasks and as unequivocal goalkeepers of policies, we argue that the task of regulatory enforcement agencies in keeping up with their goals is an intricate one. Paradoxically, the illusion of straightforwardness in terms

Table 1. Examples of Grip Factors Potentially Inducing Goal Displacement in Regulatory Enforcement Agencies (Huizinga, 2020 and References in Sections “Priority goal-ambiguity neglect in scope selection,” “Directive goal-ambiguity neglect in compliance perception,” and “Means-to-goal-subordination neglect in means specification”).

Grip factor	Description of potential goal-ambiguity-neglecting influence of grip factor	Goal-displacement effect
Major accidents and calamities	Sudden, often massive concentration of attention on limited part of the scope in the aftermath of these negative events which may endure months or even years	Goal narrowing (scope)
Risk analyses	Locking-in on part of the scope through risk analyses: as parts of the scope assigned as low risk are no longer inspected, “intelligence deficits” arise, reinforcing the even lower priority setting of these parts	Goal narrowing (scope)
Cover to cover	Unfocused approach of the complete regulatory framework mandated in the absence of risk analyses or based on rudimentary risk analyses, thereby including superfluous inspections	Goal widening (scope)
Letter of the law	Black-letter compliance perception, constraining solutions in the spirit of the law	Goal narrowing (compliance)
Regulatory burden	“Laissez-faire” enforcement style, insufficiently limiting the set of potential solutions permitted by (flexible) requirements resulting from a strong focus on limiting the regulatory burden	Goal widening (compliance)
Agency structure	Ongoing reform aimed at optimal organizational strategy and structure, diverting from original goals	Goal diversion (input)
Enforcement techniques	Strong focus on specific techniques, diverting from the original goals	Goal diversion (input)
Enforcement procedures	Strict and uniform adherence to (information technology directed) procedures, diverting from original goals	Goal diversion (throughput)
Enforcement outputs	Strict and uniform generation of limited set of enforcement outputs, diverting from original goals	Goal diversion (output)
Budget cuts	Reduction of resources, usually accompanied by organizational reform and reduction of enforcement burden often associated with new public management and directed at minimizing perceived organizational redundancy	Goal diversion (means), goal narrowing (scope) and goal widening (compliance)

of tasks may be strengthened by the very reliance on simple grip factors that neglect this intricacy.

A second scientific implication is that we have connected two still largely independent lines of research concerning organizational goals: goal ambiguity and goal displacement. We have argued that goal displacement might be a contributing factor to goal ambiguity’s negative influences on organizational effectiveness. Further research may shed additional light on this relation. A third scientific implication pertains to the possible relevance of the proposed framework for other types of public and private

organizational settings and activities involving controlling and improving compliance. These may include activities such as the implementation of internal guidelines or auditing activities. More generally, a comparable vulnerability to goal displacement may be encountered in other (public) organizations characterized by complex, ambiguous goals for which goal achievement is difficult to evaluate.

In addition, two practical implications arise. First, the concept of goal displacement appears to be useful to identify situations of limited or even negative effectiveness caused by a suboptimal goal orientation of regulatory enforcement approaches. Our proposed framework covering fundamental pitfalls due to goal displacement could be helpful in obtaining a more systematic picture of such disappointing or counterproductive effects. As such, a goal-displacement perspective may offer valuable insights into the functioning of these agencies.

Second, as the number of effect evaluations of enforcement strategies and methods will probably remain limited in the years to come, goal-displacement research could provide useful insights into how to increase the effectiveness of regulatory enforcement. Our proposed framework lays a foundation to design and conduct enforcement activities that seek to avoid multiple pitfalls simultaneously, whereas in an isolated approach, avoiding one pitfall may lead to another one.

A goal-displacement approach to effectiveness can be qualified as a negative approach, as it seeks to highlight ways of avoiding or mitigating pitfalls of effectiveness. It is a perspective that reflects a cautious and modest attitude toward efforts to increase the effectiveness of these public agencies. As such, it is based on an awareness of the intricacy of the goals of these agencies and the associated difficulties of evaluating performance. Consequently, it would lead to a management style characterized by a general reluctance to apply “one-size-fits-all” approaches and would instead favor a style that could be termed ambiguity management. While goal displacement may to some extent prove unavoidable, consciously taking its risk into account when designing and implementing enforcement activities may provide a promising avenue to improve the effectiveness of regulatory enforcement.

Obviously, more empirical research is necessary to test the significance of goal displacement affecting these agencies in more depth as well as the contributing role of goal-complexity neglect mediated by grip factors, as elaborated. In addition to a general testing based on the propositions formulated above, we can think of at least four specific areas of interest. A first area pertains to the potentially strong influences of dominant stakeholders’ expectations, as these may translate into a strong focus on specific grip factors. A second area of interest is the possibility of multiple displacement effects related to grip factors. Thirdly, regulatory enforcement agency

characteristics may provide interesting insights. These characteristics include the regulatory domains covered, the degree of flexibility of the regulations covered, and the experience and background of the enforcement personnel within these agencies. Finally, other expectations and influences than the ones discussed in this paper might be relevant, possibly leading to yet other goal-displacement effects.

Notes

1. We do not consider mission-comprehension ambiguity which refers to the understandability of the organizations' mission statement as regulatory enforcement agencies usually have relatively straightforward mission statements referring to "promoting compliance and reaching regulations' outcomes" (OECD, 2014) which are relatively easy to understand, explain, and communicate; however, see note 3.
2. At least two reasons can be given that point to the limitations of the distinction between these three processes. First, while it seems logical that scope selection and compliance perception take place independently, they may in practice be intermingled. For example, a very strict compliance stance resulting in the detection of much noncompliance will influence future scope selections by expanding the part of the scope considered relevant to inspect. Second, both scope selection and compliance perception can be considered as processes involving a means-goal sequence in itself, applying methods such as risk analyses and allocation rules in the case of scope selection.
3. It is interesting to note that this gap between the actual goals of regulations and the interpretation of this goal by stakeholders as total risk elimination could be interpreted as an example of mission-comprehension ambiguity as defined by Chun and Rainey (2005a). See note 1.
4. Interestingly, very low levels of formalization may also be associated with goal displacement: by allowing extensive professional discretion, individual enforcers or groups of enforcers may be enabled to create numerous methodological "bubbles" of methods within the agencies that could also be affected by means-to-goal-subordination neglect.

Notes on contributors

Kees Huizinga is a PhD student at Rotterdam School of Management Erasmus University.

Martin de Bree is researcher at Rotterdam School of Management Erasmus University.

ORCID

Martin de Bree  <http://orcid.org/0000-0001-5155-3850>

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