Reputation and Organizational Politics: Inside the EU Commission

Jens Blom-Hansen
Department of Political Science
Aarhus University
Denmark
Email: jbh@ps.au.dk

&

Daniel Finke
Department of Political Science
Aarhus University
Denmark
Email: finke@ps.au.dk

First and preliminary version - please do not cite without the permission of the authors

Paper prepared for presentation at the EUSA Fifteenth Biennial Conference, 4-6 May 2017, Miami, Florida, USA.

Reputation and Organizational Politics: Inside the EU Commission

1. Introduction

Coordination in large administrative systems fascinates and perplexes public administration scholars. Max Weber (1970 [1922]), the founder of the modern study of bureaucracy, famously considered a hierarchically structured bureaucracy superior to other ways of organizing administrative systems. However, organizing large administrative systems such as modern governments as one big hierarchy is done nowhere. The exact reasons why this is the case are not entirely clear. However, as suggested by Luther Gulick (1937: 7), a prominent scholar from the scientific management school in the early twentieth century, one of the reasons lies in human nature: "Just as the hands of man can span only a limited number of notes on the piano, so the mind and will of man can span but a limited number of immediate managerial contacts".

Whatever the reason, the fact is that in the real world most large governmental systems are not organized as one big hierarchy, but as a set of parallel hierarchies, typically in the form of 15-20 equal-ranking ministries. This raises a challenge of how to secure coherent policies across these hierarchies. The simple answer is coordination. However, finding out how and to what extent policies should be coordinated across hierarchies has proven to be surprisingly difficult. Scholarship agrees that coordination has the potential to increase organizational performance and quality, but that moving beyond minimal coordination in the form of simple clearance points carries considerable transaction costs. Further, scholarship agrees that almost all modern politico-bureaucratic systems struggle with the coordination challenge and, finally, that the real world presents a wide variety of coordination efforts (Scharpf 1994; Peters 2015; Christensen and Lægreid 2008; Bouckaert et al. 2010; Lægreid et al. 2014; Wegrich and Stimac 2014; Jordan and Schout 2006; Koop and Lodge 2014; Metcalfe 1994).

Our understanding of this variation is limited. The puzzle is what guides the choice of coordination efforts in large organizational systems? This paper addresses this question through the lens of reputation theory. Although building on insights from classical public administration perspectives, reputational theory as a distinct perspective on public organizations is a relatively recent intellectual development. Its core claim is that agency managers seek to build a strong reputation for their agency as a means to secure autonomy and to create a shield of protection against hostile actors in the environment. Its distinguishing concept is that of audience. A core

argument is that agency managers pay close attention to their audiences and to the fact that their audiences monitor them (Carpenter 2001; 2010; Wæraas and Maor 2015; Moffitt 2010).

The reputational perspective offers an answer to the puzzle of coordination, namely that internal coordination is part of an agency's audience management. This is especially true in large fragmented agencies facing hostile environments. In such agencies it is both urgent and demanding to secure a unified position. Studying interdepartmental coordination in such a setting from a reputation-based perspective thus offers an opportunity to increase our understanding of this core issue in the study of bureaucracy. At the same time it offers an opportunity to develop the reputational perspective on public agencies. This perspective has so far mostly focused on the external implications of an agency's audience management. A study of coordination focuses on the internal implications of audience management and thus explores the theory's empirical domain.

This paper presents such a coordination study. It investigates coordination inside the EU Commission, the central executive institution in the European Union. This is a promising empirical testing ground. As noted by Carpenter and Krause (2012: 26), "in any organization worth the name, the vessel is actually a flotilla, never easily moving in unison". This is nowhere more true than in the case of the EU Commission. Its top management is divided among 28 different commissioners, one for each EU member state, while its administrative part is split into almost fifty different directorates-general and specialized services. At the same time, the EU Commission faces a highly skeptical environment in the form of the EU member states, the European Parliament, organized interests, the media and the wider public. Consequently, internal coordination represents a challenge of considerable dimensions. In sum, the EU Commission offers a promising case for studying audience-driven interdepartmental coordination.

Althought coordination is a long-standing concern in the study of bureaucracy, the concept is rarely defined in an exact way. Building on Koop and Lodge (2014), we define coordination as *the attempted adjustment of actions among interdependent actors to achieve specified goals*. This definition treats coordination as instrumental behavior by units in an organizational system, but leaves the outcome undetermined. We thus define coordination as a process, not an end-state, cf. the conceptual discussion in Peters (2015: 10-11).

The paper is structured as follows. We first discuss the reputational perspective and argue how this perspective provides an understanding of coordination efforts. We then apply this argument on the EU Commission. We present this institution and explain what we already know about its internal coordination. We then move to methods and data. Our data stem from the EU

Commission's internal digital coordination system, CIS-net. We have obtained access to all initiatives subjected to CIS-net coordination in 2015 and 2016, a total of almost 14,000 cases. Having presented this dataset and how we use it to measure and analyze coordination, we present our empirical analysis. We analyze the impact of audience sensitivity and audience scope on coordination efforts. We find that the former has a strong impact, while the result for the latter is mixed. We conclude by discussing the implications of our findings for the reputation theory and for the empirical study of the EU Commission.

2. Reputation and organizational behavior

Like other agencies, the EU Commission (from now on simply "the Commission") protects its reputation, particularly its reputation as a guarantor of competent and unbiased supranational regulation. An agency's reputation is defined as a set of symbolic beliefs about the agency's capacity, history and mission that are embedded in multiple audiences (Carpenter 2010: 33). An agency's reputation is a valuable political asset, which increases the autonomy and legitimacy of the agency. It can be used to build political support, to increase formal discretion, to protect the agency from political attack and to build a set of constituencies in the agency's environment. A reputation-based understanding of agency behavior is based on the assumption that the agency is driven by concerns of status, legitimacy, and survival rather than budget maximization, monetary incentives, or empowerment (Carpenter 2001; 2010).

The reputation-based understanding of agencies draws on and builds upon several strands of public administration literatures, including studies of bureaucratic autonomy and cooptation (Wilson 1989; Selznick 1984 [1949]), organizational sociology and its focus on legitimacy as a means to organizational survival (Meyer and Rowan 1991), and theories on blame avoidance which focus on how agencies deal with critique from the environment (Hood 2011). However, the reputational perspective is distinct from these related perspectives by its focus on the organization's audience. An audience is any actor that observes the agency and can monitor it. Examples include political institutions, interest groups, the media and the mass public. Audiences empower or weaken an agency – for example political institutions increasing or reducing the agency's formal authority, or firms accepting or challenging its regulation. Agencies therefore need to adapt to their audiences. Agency behavior is therefore to a large extent shaped by anticipation

and reaction to audience. A reputation-based understanding of agencies therefore involves studies of audience-induced behavior (Carpenter 2010: 33-34; Maor 2015; Moffitt 2010).

Audience management has implications for an agency's external behavior as well as its internal organization and decision-making. However, the literature has overwhelmingly focused on external manifestations of audience management. A considerable number of studies have analyzed agencies' communication strategies and branding tactics as a means to handle reputational threats (Maor et al. 2013; Gilad et al. 2015; Frandsen et al. 2016; Byrkjeflot 2015; Christensen and Lægreid 2015; Schanin 2015; Blomgren et al. 2015; Bjørnå 2015; Salomonsen and Nielsen 2015; Wæraas 2015). But a range of other external manifestations of audience management have also been investigated, including the difference between pre- and post-market regulation by the US Food and Drug Administration (Carpenter 2010: 465-544, 585-635); the macroeconomic projections of US fiscal agencies (Krause and Douglas 2005); reputation as a driver of accountability behavior (Busuioc and Lodge 2016); public health agencies' responses to influenza pandemics (Baekkeskov 2017); network performance (Moynihan 2012); and regulatory agencies' collection of information on non-compliant behavior by regulatees (Etienne 2015).

Compared to this sprawling literature on external manifestations of audience management, internal manifestations have received far less attention. But the reputational perspective has plausible implications for internal organizational decision-making and prioritization of resources. Audience management is not only a driver for external action, but also for internal affairs. If consequential, audience management is also organizational politics. Strategic adaptation to audiences requires careful targeting of an organization's scarce resources. By implication, reputational concerns can be studied by focusing on internal organizational dynamics. However, so far this has only be done to a very limited extent. Studies have been limited to reputation-driven prioritization of selected agencies' organizational tasks (Gilad 2015), decision-making time (Carpenter 2002; 2010: 492-505; Maor and Sulitzeanu-Kenan 2013), and the involvement of advisory committees in internal decision procedures (Moffitt 2010).

The key theoretical contribution of this paper is to take the study of reputation-driven behavior inside an organization one step further. This is done by focusing on the EU Commission. This organization offers a setting where audience management should have straightforward implications for internal dynamics. As will be argued below, the Commission is an increasingly fragmented and specialized institution – politically and administratively – so interdepartmental coordination has grown into a challenge of considerable dimensions. Securing coherent regulatory

initiatives and a united Commission behind these initiatives is demanding. Since the Commission is expected to produce several thousand regulatory initiatives every year, coordination cannot be comprehensive in all cases. So, prioritization of coordination efforts is necessary. If audience management matters, it should matter for the decision of when to engage in comprehensive interdepartmental coordination. In the following, this argument is spelled out in more detail.

3. A reputational perspective on interdepartmental coordination in the EU Commission

According to the founding Treaties, the Commission is set up as a kind of European super-agency. It is endowed with constitutional independence to a degree that many national (semi-)independent agencies would envy. The Treaty states that "[i]n carrying out its responsibilities, the Commission shall be completely independent…. the members of the Commission shall neither seek nor take instructions from any Government or other institution, body, office or entity" (TEU, article 17). In addition, the Commission has at its disposal a wide range of resources to carry out its tasks. Its formal powers include a near-monopoly of legislative initiative, delegated powers to issue tertiary regulation in almost all policy areas, and discretionary power to bring infringement proceedings against member states that fail to comply with EU law. To solve these tasks the 28-person College of Commissioners have a civil service of approximately 33,000 employees. In sum, the Commission has a privileged basis for assuming an autonomous role in EU politics.

However, the Commission's autonomy is far from unlimited. The member states and the European Parliament control the appointment of the commissioners, decide the Commission's budget, codecide its legislative proposals and carefully control its delegated powers to issue tertiary regulation. In addition to these fundamental constitutional traits, the Commission's autonomy has been severely challenged over the past two decades. First, since Maastricht the member states have been reluctant to continue the apparently ever-increasing power of the EU and, by implication, the Commission. They introduced a pillar structure to the Treaties and thus strengthened intergovernmental decision-making in selected policy areas. Second, successive functions have been carved out of the Commission's portfolio and entrusted to European agencies thus undermining the Commission's autonomy from below. Today more than 30 such agencies operate alongside the Commission. Third, the Lisbon Treaty strengthened the EU's foreign policy capacity and carved out the main external functions of the Commission and transferred them to the new common EU foreign minister and foreign service (the "High Representative" and the "European

External Action Service"). Fourth, the Commission has been under growing pressure from the European Parliament whose legislative, financial and monitoring powers have been strengthened over successive treaty changes since the Single European Act in 1987. The Parliament has also acquired increasing powers over the appointment of the Commission. It now elects the Commission President and has successfully installed a hearing procedure that enables it to influence the appointment of individual commissioners and the distribution of portfolios among them. Finally, with the increase in the EU's functions over time, not least to include sensitive issues like food safety, environmental protection and financial regulation, the Commission's actions are also increasingly a matter of public concern.

Due to these developments, most observers agree that the Commission is treading a fine balance between autonomous action and responsiveness to its environment. Kassim et al. (2013: 130) talk about "a citadel under siege". Hartlapp et al. (2014: 27) consider the Commission's institutional context politicized and consisting of elements that "constrain or facilitate policy choices". Wille (2013) finds that the Commission has gradually become enmeshed in an "accountability architecture" with "more mechanisms in place than ever before". Majone (2002) discusses the gradual parliamentarization of the Commission and its growing dependence on the majority position in the European Parliament, whose "influence will be felt in all its [the Commission's] activities, whether administrative or legislative". Ellinas and Suleiman (2012: 201) find that the Commission and its employees are faced with "political attempts to curb their autonomy" and "an increasingly more adverse political environment".

In other words, the Commission's ability to manage its audiences – the Council of Ministers, the European Parliament, other EU institutions, member states, interest groups, the media, and the wider public – appears more important than ever. However, at the same time, adapting to the outside world is arguably more demanding than ever for the Commission. Adaptation requires a capacity for strategic interaction with outside actors. This again presupposes a certain capacity to act as a unitary actor. This assumption is often readily assumed fulfilled, and the Commission is often portrayed as a unified "engine of integration". However, in reality the Commission is a fragmented organization, and coordinated action is challenging and time-consuming.

Fragmentation is most evident at the top of the organization, the College of Commissioners. As noted by Coombes (1970) in the first major study of the Commission:

> The Commissioners […] differ from most national executive leaders in that they are not bound together by membership of the same political party or by adherence to the same mandate. Since each Commissioner is approved in practice by his own country's government it cannot truly be said that they are collectively responsible for their tenure of office. Indeed no one has yet found a satisfactory explanation of what holds them together (Coombes 1970: 252).

The difficulties identified by Coombes almost fifty years ago have intensified many-fold over the ensuing years. The Commission is now led by a college of 28 commissioners. They do not necessarily know each other upon taking office, are not tied together by any party organization or shared ideology, and do not have any common future once their time in office is completed.

However, fragmentation not only occurs at the political level, but is also evident at the administrative level. First, the Commission is divided into an increasing number of Directorates-General (DGs) and services. The number of DGs now exceeds the number of ministries in most national government systems. The DG structure has grown from the original nine to (so far) 31, cf. Appendix A, which shows the DG structure as of 2017. To this number can be added 16 so-called services of a more technical nature.[1] This dramatic development is partly due to the growth in the EU's policy competences over time, partly to enlargement of the EU and the associated increase in the number of commissioners which has expanded the need for a sufficient number of Commission portfolios (Franchino 2009; Nugent and Rhinard 2015: 167-200). Second, the growth in the number of member states has led to an increasingly fragmented work force. The multinational composition of the Commission now includes officials of 28 different nationalities. In addition to its organizational fragmentation, the Commission therefore also faces a host of challenges of socialization, communication and cross-cultural (mis)understandings (Ban 2013).

The most immediate challenge facing the Commission if it seeks to engage in audience management is therefore internal coordination. Credibility and legitimacy is damaged if the Commission cannot present a unified position to the environment. But coordination is extremely demanding because of the Commission's fragmented nature and the large number of regulatory initiatives it is expected to take every year. For example, according to Eur-Lex, the EU's official legal database, the Commission took 2,603 initiatives for binding regulation in 2016, including both

[1] Examples include the European Anti-Fraud Office, the Commission's Internal Audit Service, and the Commission's Legal Service.

legislative proposals and adoption of delegated rules.[2] This number actually underestimates the Commission's annual output of regulatory initiatives because Eur-Lex only includes initiatives published in the EU's *Official Journal*. But the Commission adopts a high number of decisions every year that are not published because they are directed at individual member states, companies or persons. The Commission's complete annual regulatory output is therefore very high, and comprehensive coordination cannot be done in every case. In other words, coordination needs to be done with care.

The reputation-based perspective provides a clear hypothesis on what guides the prioritization of coordination: Cases that have the attention of the Commission's audiences will receive the most careful internal coordination. More specifically, the potential damage to the Commission's credibility and legitimacy ("audience costs") depend on the applicable decision making procedure and the salience of a case. The decision-making procedure determines the involvement of external actors (henceforth: "Scope of the Audience"). The salience determines the attention those actors devote to the case (henceforth: "Sensitivity of the Audience").

In the following, we discuss our strategy to investigate the effects of audience scope and sensitivity empirically. However, before doing so, we briefly explain what we already know about coordination inside the Commission.

4. State-of-the-art: Coordination inside the Commission

Although no comprehensive account is available of the extent of coordination inside the Commission, it is not unchartered territory. We start with the formal set-up, which signals high coordination ambitions. The Commission's rules of procedure require that "the department responsible for preparing an initiative shall ensure from the beginning of the preparatory work that there is effective coordination between all the departments with a legitimate interest in the initiative" (Commission 2010a: Article 23).

This procedural rule is supported by a number of organizational arrangements at both the administrative and political level. At the administrative level, a number of units with special coordinating responsibilities exist. The most important is the Secretariat General with a staff of about 600, which reports directly to the Commission president. It is comparable to the prime

[2] This number was extracted from the Eur-lex database by the system's search function ('Search in legislation'). The author of document was specified as European Commission and the date range as 01/01/2016 to 31/12/2016.

minister's office in national governments, but occupies a much more active coordinating role (Kassim 2006). Other special coordinating units at the administrative level include the Commission's Legal Service, DG Budget, and DG Human Resources and Security. At the political level, several coordination mechanisms exist. Each commissioner has a personal office, the *cabinet*, which is responsible for keeping the commissioner informed about the work of other commissioners (Spence 2006). Groups of commissioners are often formed to keep focus on important cases, a system which Commission President Juncker took to new heights in 2014 when he appointed vice-presidents as "super-commissioners" in charge of priority projects cross-cutting several portfolios (Commission 2014). Finally, the entire College of Commissioners meets once a week to discuss important cases.

These coordination mechanisms may ensure "negative coordination", a concept introduced by Scharpf (1994). That is, clearance systems that seek to ensure that new initiatives do not interfere with the established policies and the interests of other units. In contrast, "positive coordination" seeks to maximize the overall effectiveness by exploiting the concerted efforts of several independent units. This is a much more ambitious type of coordination and needs to take place at the level of policy-preparing units. In the Commission this would mean the daily work in the individual DGs.

The extent to which this takes place cannot be estimated on the basis of the formal set-up. We therefore now turn from the formal set-up to research on coordination in practice.

Several studies based on different sources suggest that a considerable amount of cross-DG coordination in fact happens in the daily work of the Commission. First, informed inside accounts based on participant observation describe that much energy is spent on interdepartmental coordination. Colorful accounts of the time used in endless coordination meetings and on deploying sometimes devious coordination tactics is provided by, for example, Ross (1995), a researcher who was stationed for a year in the cabinet of Jacques Delors in the early 1990s, and Eppink (2007), a Dutch civil servant who spent seven years working in various cabinets in the Commission around the turn of the millennium.

Second, a number of studies based primarily on interviews also indicate a high level of day-to-day coordination. Hooghe (2001: 62) reports that top Commission officials normally meet about weekly with administrative equals in other DGs. Stevens and Stevens (2001: 212-214) explain that all directors-general meet regularly once a week to keep an overview of the progress of work. They also find that new initiatives are prepared in inter-service groups as a matter of standard

operating rule. They estimate that internal coordination in the Commission occurs more widely than in national administrations. Wille (2013: 146-161) finds that a clearer distinction between administrative and political roles in the Commission is developing, in which the role of the DGs is to secure that all inside turf battles are taken care of before new initiatives are sent on to the political level.

Third, studies based primarily on survey data also suggest a high daily level of coordination. The most comprehensive study is Kassim et al. (2013), who surveyed 4,621 senior and junior Commission officials. They directly asked these officials about their views on information sharing inside the Commission and on interdepartmental coordination. They found the answers “surprisingly positive” (p. 188), since most respondents provided positive or neutral answers to all their questions on these two issues.

Finally, analyses based on case-studies point in the same direction. The most comprehensive one is Hartlapp et al. (2014) who studied the Commission’s preparation of 48 cases of secondary legislative proposals. They found that the preparation of proposals is a lengthy process, taking on average more than two years. Much of this time is spent on internal coordination among relevant DGs. They found this process to be often conflictual, but also to entail some strategic options for the responsible DG. But most of all, they found internal coordination to be comprehensive and time-consuming. These findings are echoed by Jordan and Schout (2006), who conducted a detailed study of coordination in the environmental area. They found inside coordination in the Commission to be conflictual, but very ambitious.

In sum, there is no doubt that the Commission expends considerable efforts on internal coordination before presenting regulatory initiatives to the outside world. However, the available evidence does not provide insight into how coordination efforts are prioritized. But as argued above, the reputational perspective provides a clear hypothesis on this question, namely that cases which have the attention of the Commission’s audience will receive the most careful internal coordination. We now turn to the practical investigation of this hypothesis.

5. Methods and data

Our general model to investigate the relationship between the Commission’s internal coordination and the scope and sensitivity of its audience is this:

$$COORDINATION_i = \alpha + \beta_1 SENSITIVITY_i + \beta_2 SCOPE_i + \beta_3 CONTROLS_i + \varepsilon_i,$$

where the subscript "i" refers to the individual case being coordinated, COORDINATION is the extent of interdepartmental coordination in the Commission, SENSITIVITY and SCOPE measure the sensitivity and scope of the Commission's audience, and CONTROLS is a set of relevant control variables.

To investigate this model we use data from CIS-net, which is an electronic database introduced by the Commission's Secretariat-General in 2001. It is used to circulate draft proposals and draft decisions to concerned DGs. The system registers which DG is responsible for the proposal (the 'lead DG'), which DGs are consulted, the DGs' formal exchanges, their agreement, opposition and comments. We have obtained access to all initiatives subjected to CIS-net coordination in 2015-2016 – that is, the first two full years of the Juncker Commission.[3]

All initiatives that require a formal decision by the College of Commissioners must be coordinated via CIS-net. In practice this primarily means draft binding rules, e.g. legislative proposals, delegated acts or implementing acts. In addition draft staff working papers must be cleared through this system. Other initiatives (e.g. soft law initiatives, letters from commissioners, reports, programs, and papers) can, but need not, be coordinated via CIS-net (Commission 2010b; 2010c). In our analyses we do not include initiatives that are voluntary to subject to a CIS-net procedure, since we do not know how representative they are.

The CIS-net procedure is initiated when an initiative has reached such an advanced stage that the lead DG considers it ready to send on to the political level. That is, impact assessments, consultation with outside actors, and all other preparatory work must be completed. It is the final clearing by the DGs that have either been directly involved in the preparation of the initiative or have a legitimate interest in the initiative. The CIS-net procedure is therefore relatively short lasting only 10-15 working days.

In the following we explain how we use the CIS-net data to construct measures of the variables in our model above to investigate coordination inside the Commission.

Dependent Variable: Coordination

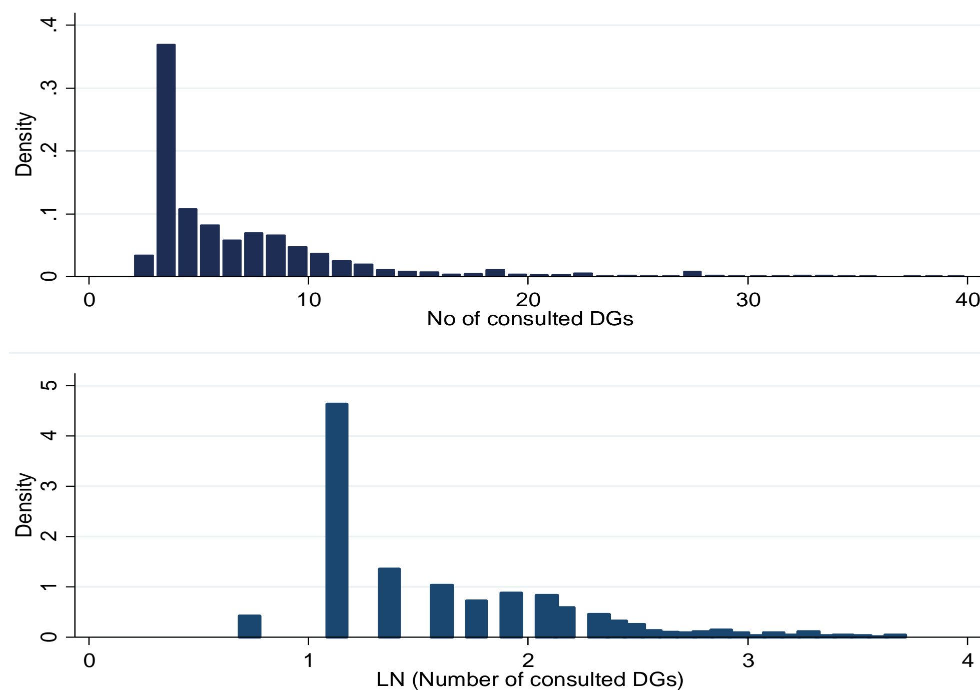
Our measure of coordination is the number of DGs and Commission services that the lead DG consults with. This can vary quite dramatically across initiatives. For example, the CIS-net database

[3] The dataset does not include confidential files (e.g. decisions to individual companies).

shows that DG Education and Culture consulted with no less than 30 other Directorates-General in 2016 when preparing a proposal for a decision of the European Parliament and of the Council for a European year of cultural heritage. In contrast, the same DG – DG Education and Culture – only consulted with five other DGs in 2015 when preparing a recommendation for a Council decision designating the European capitals of culture for the year 2019 in Bulgaria and Italy. Using Peters' (2015: 10-11) terms, the number of consulted DGs measures coordination as a process, not an outcome. But the process is the theoretically relevant element to focus on since our hypothesis based on the reputational perspective centers on coordination *efforts*, not their result.

Inspecting the distribution of our coordination measure reveals that we are dealing with a highly skewed dependent variable, cf. Figure 1. We deal with this issue in two ways. First, we use the natural log to adjust the distribution to the assumptions of OLS regression analysis (see Figure 1). Second, we check the robustness of our results by estimating Poisson models, which is, given our fixed effects instrumented variables approach, challenging with respect to a comparative model evaluation. Fortunately, both approaches lead to similar substantive results.

Figure 1: Histogram of Dependent Variable (No. of Consulted DGs) and its log. Transformation (only binding rules, N=7343).



Independent Variable: Scope of the Audience

The scope of the audience refers to the degree to which external actors are involved in the Commission's initiatives. We measure this by the decision-making procedure, which varies considerably acoss initiatives, cf. Table 1.

Table 1. Initiatives subjected to CIS-net coordination in 2015 and 2016

Type of initiative	Decision-procedure	No. of initiatives 2015	 2016	 Total
Proposal for a legal act	Commission proposes rule; Council and/or European Parliament decides	124	199	323
Delegated act	Commission adopts rule, but may subsequently be vetoed by Council and/or European Parliament in specified approval period	183	208	391
Commission implementing act	Commission adopts rule after approval by comitology committee composed of member state representatives (post-Lisbon procedure)	2,049	2,284	4,333
Proposal for Council implementing act	Commission proposes rule; Council decides	6	16	22
Commission act	Commission adopts rule after approval by comitology committee composed of member state representatives (pre-Lisbon procedure); or adopts rule based on competence specified by the Treaty	1,179	1,126	2,305
Other initiative	Non-binding rules; no legal requirement to involve external actors (NB: data set not comprehensive)	3,421	3,187	6,608
Total		6,962	7,020	13,982
Total, excl. other initiatives		3,541	3,833	7,374

Table 1 shows that approximately 7,000 initiatives go through CIS-net coordination annually. This amount can be compared to informed estimates of the number of annual decisions made by the Commission. For example, Szapiro (2013: 27), an official in the Commission's Secretariat General, reckons that the Commission makes approximately 10,000 formal decisions every year. Since initiatives that do not require formal approval by the College of the Commissioners are not necessarily included in the CIS-net database, these numbers seem compatible.

Table 1 further shows that draft binding rules comprise approximately half of all initiatives subjected to CIS-net coordination over the years 2015-2016. Since these rules must be

subjected to CIS-net coordination this is a comprehensive measure of the Commission's rule production. The most frequent rule type is a Commission implementing act. There is an annual amount of approximately 2,000 of this type of act. In comparison, Commission proposals for legal acts to be decided by the Council and the European Parliament only amount to approximately 200 per year. According to Table 1, around 3,000 "other initiatives" are annually coordinated by the CIS-net system. However, as noted, these initiatives are not obligatory to coordinate through this system, so we do not include them in our analyses, since we do not know how representative they are.

The number of observations in our study is therefore the 7,434 draft binding rules subjected to CIS-net coordination in 2015 and 2016. These rules encompass rules decided under a variety of procedures and, hence, a variety of ways of involving the Commission's audiences. Proposals for *Legal Acts* – directives, regulations, decisions – are relatively few in numbers, but often very salient. They are proposed by the Commission, but decided by the Council of Ministers and the European Parliament in the inter-institutional legislative process. These institutional actors therefore take a keen interest and subject these acts to intensive scrutiny. Consequently, the Commission goes to great lengths to anticipate their preferences as far as possible (Thomson 2011; Crombez and Vangerven 2014). These acts are also objects of intense lobbying by interest groups (Greenwood 2011; Klüver 2013). Finally, although EU affairs do not figure prominently in the media (Machill et al. 2006), these acts sometimes make it into the news.[5]

Compared to proposals for Legal Acts, all other regulatory initiatives by the Commission usually receive far less attention from the environment. But a distinction can be made between *delegated acts and implementing acts*. These acts were introduced by the Lisbon Treaty. The idea was to make a distinction between political and technical delegation. Although this distinction turned out to be controversial in practice, *Delegated Acts* are used relatively more frequently in controversial areas like food safety, environmental protection, and financial regulation, while implementing acts are used in less controversial areas like agriculture, fisheries and transportation (Brandsma and Blom-Hansen forthcoming). We therefore expect the Commission to be more audience-sensitive towards delegated than implementing acts. The final type of act, so-called *Commission Acts*, includes secondary acts as well as tertiary acts that are not delegated or implementing acts. Due to their heterogeneous nature they are difficult to compare to

[5] An illustration of this point is the fact that the researchers in the *Decision-Making in the European Union* project were able to select 125 legislative proposals for analysis based on their coverage in the media (Thomson 2011: 29-30)

delegated and implementing acts. So, we do not formulate a concrete expectation beyond that the Commission is plausibly less audience-sensitive than in the case of legislative proposals.

Independent Variable: Sensitivity of the Audience

We approximate audience-sensitivity by the decision mode under which the proposal is handled inside the Commission. According to the Commission's rules of procedure, decisions in the College can be made in four ways (Commission 2010a: article 4):

- Oral procedure: Adoption at the weekly Wednesday meeting of the College
- Written procedure: Adoption by circulation in writing to all members of the College
- Empowerment: Adoption by mandate given to one of the members of the College
- Delegation: Adoption by mandate given to a director-general of a DG

The first two procedures, the oral and written procedures, involve the full College of Commissioners. In the third and fourth procedures, the empowerment and delegation procedures, the College delegates decision-making power to an individual commissioner or director-general to act on behalf of College. According to the Commission's rules (Commission 2010a; 2010d), it is the full college that decides whether to use the empowerment or delegation procedure. This decision must specify the area in which decisions can be taken on behalf of the full College and the potential scope of these decisions. In addition, delegated powers can only involve management or administrative measures. The rules furthermore specify that the empowerment procedure can only be used in areas of "routine management", while the delegation procedure can only be used to apply "detailed or purely technical criteria" (Commission 2010d: 11-13). If there is any doubt that these criteria are met, the Commission President must be consulted. Should decisions under these procedures involve matters of "political sensitivity" or "importance", the matters should be brought before the full Commission (Commission 2010d: 9). In short, the empowerment and delegation procedures are meant to relieve the full College of trivial matters.

The decision procedures that involve the full College, the oral and written procedures, are meant for important decisions. The written procedure is used in cases where all issues have been settled in the interdepartmental coordination procedure, and where there are no outstanding disagreements between DGs or services. The oral procedure is used for the most controversial cases and cases where interdepartmental disagreements have proven impossible to settle at the administrative level. According to the Commission's (2014: 4) formal rules, the oral procedure is to

be used for “items of major policy importance”. Szapiro (2013: 195; see also Nugent and Rhinard 2015: 118-128), an official in the Commission’s Secretariat General, further explains that the oral procedure is used for cases “with major political implications/politically sensitive files”. Given the high number of College decisions very few are made by the demanding oral procedure. In our dataset, only 62 out of the approximately 7,400 College decisions – that is, less than one per cent – are made by the oral procedure. In other words, the Commission needs to carefully select the cases that are submitted for oral decision by the full College of Commissioners. The written procedure is much more frequent and used in more than 40 per cent of the cases. Among the delegated decision-procedures, the empowerment procedure is used relatively rarely, in less than 10 per cent of the cases, while the delegation procedure, where decisions are delegated to civil servants, is used in almost 50 per cent of all cases.

Since the main dividing line among the four decision procedures is between full involvement of the College of Commissioners and delegation by the College to an individual commissioner or director-general, we divide the four procedures into a dichotomous variable “Delegation” that takes the value 1 in case of the empowerment and delegation modes and the value zero in case of the oral and written procedures.

Control variables

Coordination may be influenced by other factors than the scope and and sensitivity of the Commission’s audience. For example, area-specific policy dynamics may have an impact on coordination, different DGs may have different coordination traditions, or coordination may vary over time as a new College of Commissioners get acquainted with each other and with the DGs. To control for these potential confounders we used fixed DG effects to control for factors that vary across DGs and year dummies to control for factors that vary across time.

Endogeneity Threat

The decision-making procedure is determined exogenously to the choice of coordination. Unfortunately, decision mode as proxy for audience-sensitivity is potentially endogenous to the choice of coordination. Specifically, the Commission’s choice of decision mode could be determined by the same unobserved variable(s) that determine the extent of coordination. Consequently, “delegation mode” could be correlated with the error term, thus violating a basic assumption of regression analysis.

Here, we deal with this endogeneity threat using an instrumental variables approach. A "good" instrument has to fulfill two criteria: First, controlled for all other variables it has to be a significant predictor of the potentially endogenous, instrumented variable. Second, it should itself be exogenous, meaning that its causal effect on coordination should only work via the instrumented variable. While we can test the first criterion, we can only discuss the second. We apply the following inherent characteristics of the proposal to instrument delegation mode as proxy of audience senstivity:

1) Technicality: We count the number of the words and of the numbers used in the title. The higher the share of numbers to words, the more technical the content of the proposal. Expectation: Decisions over more technical proposals will be delegated to the delegation or empowerment procedure.
2) Title Length: Measured as log. of the number of all characters in the title. Expectation: Long titles indicate more technical, detailed content and, consequently, these cases should be more likely to be delegated.
3) Decision: Compared to directives and regulations, decisions are more likely to be delegated.
4) Amendment: We searched for relevant words such as amending, modifying, supplementing etc. in the title. Expectation: Amendments are often technical adjustment, so delegation should be more likely.
5) Mentioning of Member State: A dummy variable, which equals 1 if one or several member state are directly addressed in the title. Expectation: Addressing member states directly indicates a high sensitivity of at least one government, so delegation or empowerment are less likely as procedures.

All of these variables draw on inherent, i.e. exogenous, characteristics of the proposed acts. In table 2, we demonstrate that our instruments are significant predictors of delegation mode. The results justify our choice of instruments. Moreover, we argue that all four instruments only affect coordination via the concept of audience sensitivity operationalized by Delegation.

Table 2: Instruments for Delegation.

N=7374	Y=Delegation
Technicality	3.776***
	(0.215)
Title Length	1.369***
	(0.106)
Decision	4.779***
	(1.102)
Amendment	1.664***
	(0.0938)
Mention of Member State	0.696***
	(0.0548)
Constant	0.00574***
	(0.00225)
Pseudo R2	0.14
Log Likelihood	-4346.1

seEform in parentheses; *** p<0.01, ** p<0.05, * p<0.1

6. Empirical analysis

Table 3 displays the results of our regression on the log transformed number of consulted DGs. We estimate fixed effects and approximately half of the observed variance is attributable to the responsible DGs (rho between 0.47 and 0.52). The first model includes only Delegation as a proxy for audience sensitivity. Delegation mainly explains the variation within groups (R^2=0.18); hence it contributes strongly to the overall explanatory power of the FE model (R^2=0.31). In terms of effect size, Delegation reduces the extent of coordination by a factor 0.6. The correlation between fixed effects and explanatory variables justifies our choice of an FE model.

The second model instruments Delegation with the exogenous variables presented and discussed above. As a result we find an even stronger negative effect of Delegation, now reducing the extent of coordination by one half. At the same time the results indicate a slightly lower contribution to explaining the within group variation due to the use of the exogenous instruments. Moreover, the instrumentation reduced the correlation between fixed effects and explanatory variables to 0.25, yet an FE model is still recommended.

The third model includes indicators for the decision-making procedures, where “proposal for a legal act” serves as reference category. The decision-making procedures mainly contribute to explaining the variance between groups (i.e. between responsible DGs). Accordingly, the overall explanatory power remains low (R^2=0.03). The reference category is proposals for

legal act and all other procedure cause a lower extent of coordination. The effects are significant, but effect sizes are smaller compared to Delegation.

Next, we estimate the Full Model without instrumentation. Since delegation and procedures explain different components of the variance (between versus within groups), they supplement each other when estimated jointly. However, comparing model 1 to the full model reveals that we do not gain overall explanatory power by adding procedure type variables because procedure type primarily explains variation across responsible DGs (which is already captured by the fixed effects).

Finally, we turn to the Full model with exogenous instruments. Once we instrument delegation by exogenous variables, we no longer see significant difference between “Commission Implementing Acts” and “Proposal for Legal Acts” (reference category). This runs against our theoretical expectation. Moreover, the effects of “Commission Act” and “Delegated Act” are weaker and smaller. By contrast, the effect size of “Council Implementing Act” increases.

Table 4 and Figure 2 depict the predicted number of consulted DGs by Audience-Sensitivity and Scope based on the *Full Modell with exogenous instruments* for delegation. Predictions are generate setting all other variables at their means. The results strongly confirm the expected positive effect of audience-sensitivity. Highly sensitive cases have twice the predicted number of consulted DGs compared to low-sensitive cases.

Yet, the level of this effect differs by the type of act. In case of proposals for legal acts, we predict approx. 4.1 DGs with delegation and 8.1 DGs without delegation. In case of Commission Acts, we predict 3.7 with delegation and 7.2 without. For the rather rare Council Implementing Acts, we predict only 2.7 consulted DGs without and 5.2 with delegation. Unfortunately, the magnitude of these effects does not perfectly match our theoretical expectations. We expected the highest level of coordination for proposals for legal acts, followed by delegated acts and then implementing acts. Our results predict a similar level of coordination for proposals for legal acts, delegated acts and Commission implementing acts. Only the very rare Council implementing acts confirm the expected low coordination requirement.

To check the robustness of our statistical approach we re-estimate all five models using a Poisson GMM estimator (Appendix 2). The results are substantively very similar, but slightly more consulting DGs in case of high audience sensitivity. Moreover, we find that Commission Acts reveal a significantly lower level of coordination compared to Legal, Delegated and Commission Implementing Acts.

Table 3: Regression (Y= ln(No. of Consulted DGs))

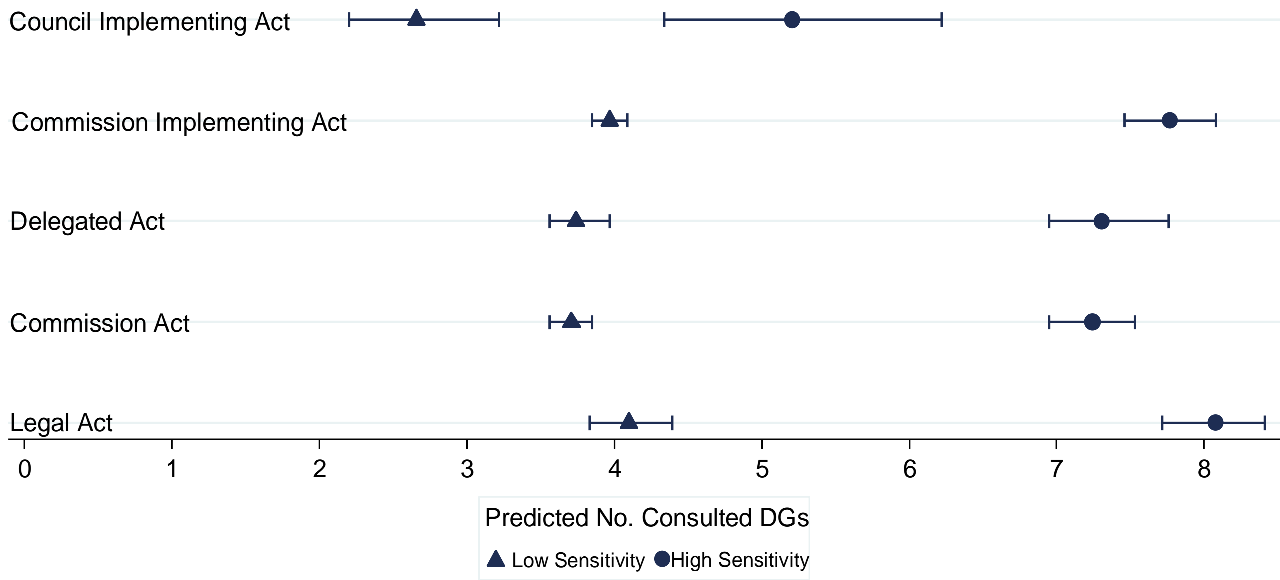
N_cases = 7374; N_groups= 35 (unbalanced)	*Sensitivity*	*Sensitivity (with Instruments)*	*Scope*	*Scope and Sensitivity*	*Scope and Sensitivity (with Instruments)*
Delegation (y/n)	0.619***	0.509***		0.621***	0.512***
	(0.00742)	(0.0163)		(0.00750)	(0.0172)
Commission Act (y/n)			0.780***	0.867***	0.904***
			(0.0225)	(0.0229)	(0.0251)
Delegated Act (y/n)			0.837***	0.893***	0.916**
			(0.0307)	(0.0298)	(0.0313)
Commission Impl. Act (y/n)			0.798***	0.915***	0.966
			(0.0233)	(0.0245)	(0.0277)
Council Impl. Act (y/n)			0.703***	0.666***	0.651***
			(0.0726)	(0.0624)	(0.0621)
Year 2015 (y/n)	0.963***	0.963***	0.958***	0.960***	0.961***
	(0.00935)	(0.00952)	(0.0102)	(0.00932)	(0.00948)
Constant	6.938***	7.768***	6.573***	7.701***	8.207***
	(0.0683)	(0.154)	(0.185)	(0.199)	(0.232)
Within R2	*0.18*	*0.15*	*0.02*	*0.19*	*0.16*
Between R2	*0.08*	*0.08*	*0.24*	*0.13*	*0.11*
Overall R2	*0.31*	*0.31*	*0.03*	*0.31*	*0.31*
corr(u_i, Xb)	*0.34*	*0.25*	*0.13*	*0.32*	*0.25*
rho	*0.52*	*0.51*	*0.47*	*0.51*	*0.51*

SE_Eform in parentheses; *** p<0.01, ** p<0.05, * p<0.1

Table 4: Predicted Number Consulted DGs (95% CIs)

	High Sensitivity	Low Sensitivity
Proposal for Legal Act	8.08 [7.71;8.41]	4.10 [3.82;4.49]
Commission Act	7.24 [6.95;7.53]	3.71 [3.56;3.85]
Delegated Act	7.31 [6.95;7.76]	3.74 [3.56;3.97]
Commission Impl. Act	7.77 [7.46;8.08]	3.97 [3.85;4.09]
Council Impl. Act	5.21 [4.34;6.22]	2.66 [2.20;3.22]

Figure 2: Predicted Number Consulted DGs (95% CIs)



7. Conclusion

(yet to be written)

Appendix A. The organization of the Juncker Commission

Departments (DGs): Agriculture and Rural Development (AGRI) Budget (BUDG) Climate Action (CLIMA) Communication (COMM) Communications Networks, Content and Technology (CNECT) Competition (COMP) Economic and Financial Affairs (ECFIN) Education and Culture (EAC) Employment, Social Affairs and Inclusion (EMPL) Energy (ENER) Environment (ENV) European Civil Protection and Humanitarian Aid Operations (ECHO) Eurostat (ESTAT) Financial Stability, Financial Services and Capital Markets Union (FISMA) Health and Food Safety (SANTE) Human Resources and Security (HR) Informatics (DIGIT) Internal Market, Industry, Entrepreneurship and SMEs (GROW) International Cooperation and Development (DEVCO) Interpretation (SCIC) Joint Research Centre (JRC) Justice and Consumers (JUST) Maritime Affairs and Fisheries (MARE) Migration and Home Affairs (HOME) Mobility and Transport (MOVE)	Neighbourhood and Enlargement Negotiations (NEAR) Regional and urban Policy (REGIO) Research and Innovation (RTD) Taxation and Customs Union (TAXUD) Trade (TRADE) Translation (DGT) *Services* Central Library European Anti-Fraud Office (OLAF) European Commission Data Protection Officer European Personnel Selection Office (EPSO) European Political Strategy Centre (EPSC) Historical archives Infrastructures and Logistics - Brussels (OIB) Infrastructures and Logistics - Luxembourg (OIL) Internal Audit Service (IAS) Legal Service (SJ) Task Force for the Preparation and Conduct of the negotiations with the United Kingdom under Article 50 of the TEU Office For Administration And Payment Of Individual Entitlements (PMO) Publications Office (OP) The Structural Reform Support Service (SRSS) Secretariat-General (SG) Service for Foreign Policy Instruments (FPI)

Source: http://ec.europa.eu/about/ds_en.htm (read 2017-03-02)

Appendix B. Results of Poisson Model

Table A2.2: Regression Results using the Poisson Model on Number of Consulted DGs

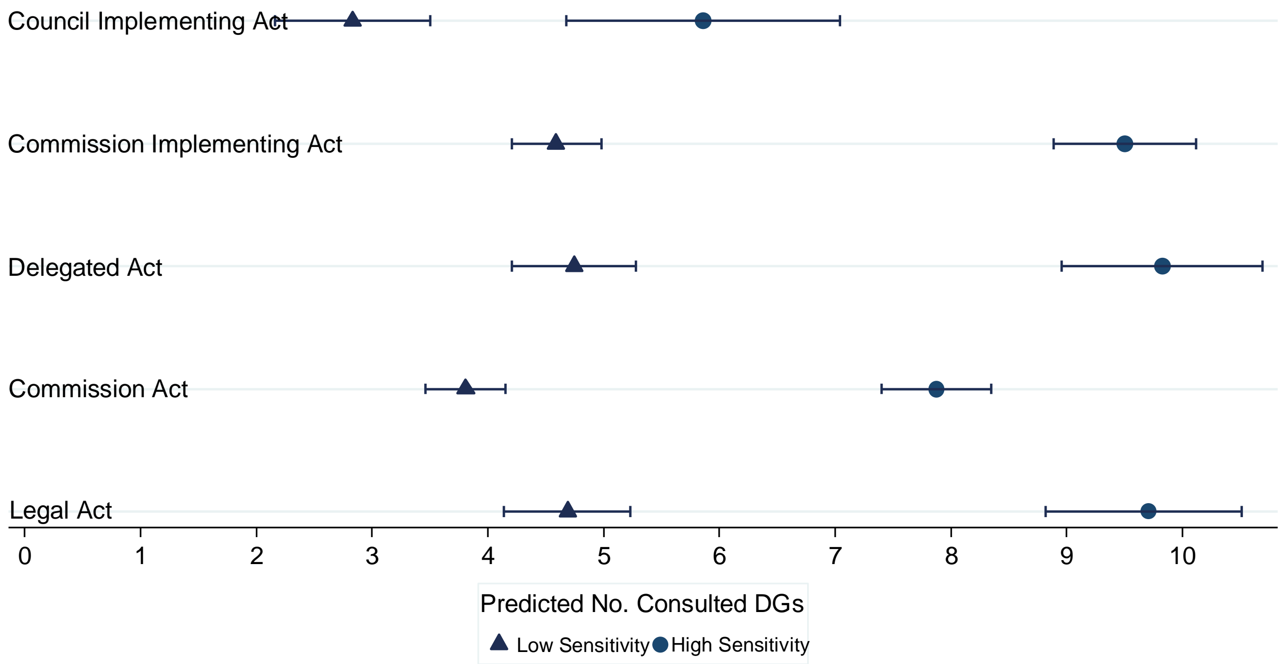
N = 7374	Sensitivity	Sensitivity (with Instruments)	Scope	Full Model (with Instruments)	Full Model
Delegation (y/n)	0.593***	0.443***		0.483***	0.600***
	(0.00638)	(0.0315)		(0.0340)	(0.00657)
Commission Act (y/n)			0.688***	0.812***	0.779***
			(0.0139)	(0.0335)	(0.0158)
Delegated Act (y/n)			0.930***	1.013	0.948**
			(0.0249)	(0.0558)	(0.0254)
Commission Impl. Act (y/n)			0.810***	0.980	0.919***
			(0.0166)	(0.0404)	(0.0188)
Council Impl. Act (y/n)			0.630***	0.604***	0.600***
			(0.0569)	(0.0663)	(0.0541)
Year 2015 (y/n)	0.915***	0.925***	0.895***	0.920***	0.907***
	(0.00844)	(0.0154)	(0.00829)	(0.0152)	(0.00840)
Constant	8.070***	8.893***	7.099***	9.111***	9.095***
	(0.135)	(0.374)	(0.177)	(0.545)	(0.230)

seEform in parentheses; *** p<0.01, ** p<0.05, * p<0.1; all models include Fixed Effects for thirty-five Responsible DGs; estimated by GMM.

Table A2.2: Predicted Number Consulted DGs (95% CIs) based on Full Model w. Instrument

	High Sensitivity	Low Sensitivity
Legal Act	9.71 [8.82;10.51]	4.69 [4.14;5.23]
Commission Act	7.88 [7.40; 8.35]	3.81 [3.46;4.15]
Delegated Act	9.83 [8.96;10.69]	4.75 [4.21;5.28]
Commission Impl. Act	9.50 [8.89;10.12]	4.59 [4.21;4.98]
Council Impl. Act	5.86 [4.68; 7.04]	2.83 [2.16;3.50]

Figure A2.1: Predicted No. of Consulted DGs (95% CIs) based on Full Model w. Instruments



Literature

Baekkeskov, Erik. 2017. "Reputation-Seeking by a Government Agency in Europe: Direct Evidence from Responses to the 2009 H1N1 "Swine" Influenza Pandemic", *Administration & Society* 49(2): 163–189.

Ban, Carolyn. 2013. *Management and Culture in an Enlarged European Commission: From Diversity to Unity?* Houndmills: Palgrave.

In Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Bjørnå, Hilde. 2015. "Dealing with Stakeholders in Local Government: Three Norwegian Cases of Municipal Reputation Management", pp. 185-202 in Wæraas, Arild and Moshe Maor (eds.).*Organizational Reputation in the Public Sector*. London: Routledge.

Blomgren, Maria, Tina Hedmo and Caroline Waks. 2015. "Struggles behind the Scenes: Reputation Management in Swedish Hospitals", pp. 163-184 in Wæraas, Arild and Moshe Maor (eds.).*Organizational Reputation in the Public Sector*. London: Routledge.

Bouckaert, Geert, B. Guy Peters and Koen Verhoest. 2010. *The Coordination of Public Sector Organizations: Shifting Patterns of Public Management*. New York : Palgrave Macmillan.

Brandsma, Gijs Jan and Jens Blom-Hansen. Forthcoming. *Controlling the EU Executive? The Politics of Delegation in the European Union*. Oxford: Oxford University Press.

Busuioc E. Madalina and Martin Lodge. 2016. "The Reputational Basis of Public Accountability", *Governance* 29(2): 247-263.

Byrkjeflot, Haldor 2015. 2015. "Driving Forces, Critiques, and Paradoxes of Reputation Management in Public Organizations", pp. 54-74 in Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Carpenter, Daniel P. 2001. *The Forging of Bureaucratic Autonomy. Reputations, Networks, and Policy Innovation in Executive Agencies, 1862-1928*. Princeton, NJ: Princeton University Press.

Carpenter, Daniel P. 2002. "Groups, the Media, Agency Waiting Costs, and FDA Drug Approval", *American Journal of Political Science* 46(3): 490-505.

Carpenter, Daniel. 2010. *Reputation and Power. Organizational Image and Pharmaceutical Regulation at the FDA*. Princeton, NJ: Princeton University Press.

Carpenter, Daniel P. and George A. Krause. 2012. “Reputation and Public Administration”, *Public Administration Review* 72(1): 26-32.

Christensen, Tom and Per Lægreid. 2008. The Challenge of Coordination in Central Government Organizations: The Norwegian Case. *Public Organization Review* 8(2): 97-116.

Christensen, Tom and Per Lægreid. 2015. ”Reputation Management in Times of Crisis: How the Police Handlede the Norwegian Terroist Attack in 2011”, pp. 95-117 Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Commission. 2010a. Commission decision of 24 February 2010 amending its Rules of Procedure (2010/138/EU, Euratom), *OJ L55*, 5.3.2010, pp. 60-67.

Commission. 2010b. Note of 20.10.2010 to the Directors General and Heads of Service on changes to the inter-service consultation procedure following the entry into force of the new rules of procedure and the rules giving effect to them – revised guide. Commission document SEC(2010)719.

Commission. 2010c. Guide to Interservice Consultation (2010). Annex to note of 20.10.2010 to the Directors General and Heads of Service on changes to the inter-service consultation procedure following the entry into force of the new rules of procedure and the rules giving effect to them – revised guide. Commission document SEC(2010)719.

Commission. 2010d. Rules giving effect to the Rules of Procedure. Annex to the Commission decision amending its Rules of Procedure. C(2010) 1200. Brussels.

Commission. 2014. The Working Methods of the European Commission 2014-2019. Communication from the President to the Commission. C(2014) 9004. Brussels.

Coombes, David. 1970. *Politics and Bureaucracy in the European Community*. London: George Allen and Unwin.

Crombez, Christophe and Pieterjan Vangerven. 2014. “Procedural Models of European Union Politics: Contributions and Suggestions for Improvement”, *European Union Politics* 15: 289–308.

Ellinas, Antonis A. and Ezra Suleiman. 2012. *The European Commission and Bureaucratic Autonomy: Europe's Custodians*. Cambridge: Cambridge University Press.

Eppink, Dirk-Jan. 2007. *Life of a European Mandarin. Inside the Commission*. Tielt: Lannoo.

Etienne, Julien. 2015. “The Politics of Detection in Business Regulation”, *Journal of Public Administration Research and Theory*, 25(1): 257-284.

Franchino, Fabio. 2009. “Experience and the distribution of portfolio payoffs in the European Commission”, *European Journal of Political Research* 48: 1–30.

Frandsen, Finn, Winni Johansen and Heidi Houlberg Salomonsen. 2016. “Responding to Institutional Complexity: Reputation and Crisis Management in Danish Municipalities”, *Scandinavian Journal of Public Administration* 20(2): 7-38.

Gilad, Sharon. 2015. “Political Pressures, Organizational Identity, and Attention to Tasks: Illustrations from Pre-Crisis Financial Regulation”, *Public Administration* 93(3): 593–608.

Gilad, Sharon, Moshe Maor and Pazit Ben-Nun Bloom. 2015. “Organizational Reputation, the Content of Public Allegations, and Regulatory Communication”, *Journal of Public Administration Research and Theory* 25(2): 451-478.

Greenwood, Justin. 2011. *Interest Representation in the European Union*. Houndmills: Palgrave.

Hartlapp, Miriam, Julia Metz and Christian Rauh. 2014. *Which Policy for Europe? Power and Conflict inside the European Commission*. Oxford: Oxford University Press.

Hood, Christopher. 2011. *The Blame Game. Spin, Bureaucracy, and Self-Preservation in Government*. Princeton, NJ: Princeton University Press.

Hooghe, Liesbet. 2001. *The European Commission and the Integration of Europe*. Cambridge: Cambridge University Press.

Jordan, Andrew and Adrian Schout. 2006. *The Coordination of the European Union. Exploring the Capacities of Networked Governance*. Oxford: Oxford University Press.

Kassim, Hussein. 2006. “The Secretariat General of the European Commission”, pp. 75-103 in David Spence and Geoffrey Edwards (eds.). *The European Commission*. London: John Harper.

Kassim, Hussein, John Peterson, Michael W. Bauer, Sara Connolly, Renaud Dehousse, Liesbet Hooghe and Andrew Thompson. 2013. *The European Commission of the Twenty-First Century*. Oxford: Oxford University Press.

Klüver, Heike. 2013. *Lobbying in the European Union. Interest Groups, Lobbying Coalitions, and Policy Change*. Oxford: Oxford University Press.

Koop, Christel and Martin Lodge. 2014. “Exploring the Co-ordination of Economic Regulation”, *Journal of European Public Policy* 21: 1311-1329.

Krause, George A. and James W. Douglas. 2005. “Institutional Design versus Reputational Effects on Bureaucratic Performance: Evidence from U.S. Government Macroeconomic and

Fiscal Projections", *Journal of Public Administration Research and Theory* 15 (2): 281-306.

Lægreid, Per, Külli Sarapuu, Lise H. Rykkja and Tiina Randma-Liiv (eds.). 2014. *Organizing for Coordination in the Public Sector. Practices and Lessons from 12 European Countries*. Houndsmills: Palgrave.

Machill, Marcel, Markus Beiler and Corinna Fischer. 2006. "Europe-Topics in Europe's Media – The Debate about the European Public Aphere: A Meta-Aanalysis of Media Content Analyses. *European Journal of Communication* 21: 57–88.

Majone, Giandomenico. 2002. "The European Commission: The Limits of Centralization and the Perils of Parliamentarization", *Governance* 15(3): 375-392.

Maor, Moshe. 2015. "Theorizing Bureaucratic Reputation", pp. 17-36 in Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Maor, Moshe and Raanan Sulitzeanu-Kenan. 2013. "The Effect of Salient Reputational Threats on the Pace of FDA Enforcement", *Governance* 26(1): 31–61.

Maor, Moshe, Sharon Gilad and Pazit Ben-Nun Bloom. 2013. "Organizational Reputation, Regulatory Talk, and Strategic Silence", *Journal of Public Administration Research and Theory* 23(3): 581-608.

Metcalfe, Les. 1994. "International Policy Co-Ordination and Public Management Reform", *International Review of Administrative Sciences* 60(2): 271-290.

Meyer, John W. and Brian Rowan. 1991. "Institutionalized Organizations: Formal Structure as Myth and Ceremony", pp. 41-62 in Walter W. Powell and Paul J. DiMaggio (eds.). *The New Institutionalism in Organizational Analysis*. Chicago, IL: The University of Chicago Press.

Moffitt, Susan L. 2010. "Promoting Agency Reputation through Public Advice: Advisory Committee Use in the FDA", *Journal of Politics* 72(3): 880-393.

Moynihan, Donald P. 2012. "Extra-Network Organizational Reputation and Blame Avoidance in Networks: The Hurricane Katrina Example", *Governance* 25(4): 567–588.

Nugent, Neill and Mark Rhinard. 2015. *The European Commission*. Houndsmills: Palgrave.

Peters, B. Guy. 2015. *Pursuing Horizontal Management. The Politics of Public Sector Coordination*. Lawrence: Kansas University Press.

Ross, George. 1995. *Jacques Delors and European Integration*. Oxford: Polity Press.

Salomonsen, Heidi and Jeppe Nielsen. 2015. "Investigating the Politics of Reputation Management in Local Government: The Case of Denmark", pp. 203-226 in Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Schanin, Yael. 2015. "Organizational Reputation, Public Protest, and the Strategic Use of Regulatory Communication", pp. 139-160 in Wæraas, Arild and Moshe Maor (eds.). *Organizational Reputation in the Public Sector*. London: Routledge.

Scharpf, Fritz W. 1994. "Games Real Actors Could Play: Positive and Negative Coordination in Embedded Negotiations", *Journal of Theoretical Politics* 6: 27-53.

Selznick, Philip. 1984 [1949]. *TVA and the Grass Roots. A Study of Politics and Organization*. Berkeley, CA: University of California Press.

Spence, David. 2006. "The Directorates General and the Services: Structures, Functions and Procedures", pp. 128-156 in David Spence and Geoffrey Edwards (eds.). *The European Commission*. London: John Harper.

Stevens, Anne and Handley Stevens. 2001. *Brussels Bureaucrats? The Administration of the European Union*. Houndmills: Palgrave.

Szapiro, Manuel. 2013. *The European Commission. A Practical Guide*. London: John Harper.

Thomson, Robert. 2011. *Resolving Controversy in the European Union. Legislative Decision-Making Before and After Enlargement*. Cambridge: Cambridge University Press.

Weber, Max. 1970 [1922]. "Bureaucracy", pp. 196-244 in H. H. Gerth and C. Wright Mills (eds.). *From Max Weber: Essays in Sociology*. London: Routledge and Kegan Paul.

Wegrich, Kai and Vid Stimac. 2014. "Coordination Capacity", pp. 41-63 in Martin Lodge and Kai Wegrich (eds.). *The Problem-solving Capacity of the Modern State*. Oxford: Oxford University Press.

Wille, Anchritt. 2013. *The Normalization of the European Commission. Politics and Bureaucracy in the EU Executive*. Oxford: Oxford University Press.

Wilson, James Q. 1989. *Bureaucracy. What Government Agencies Do and Why They Do It*. New York: Basic Books.

Wæraas, Arild. 2015. "Municipal Reputation Building in Norway: A Reputation Commons Tragedy", pp. 227-243 in Wæraas, Arild and Moshe Maor (eds.). 2015. *Organizational Reputation in the Public Sector*. London: Routledge.

Wæraas, Arild and Moshe Maor (eds.). 2015. *Organizational Reputation in the Public Sector*. London: Routledge.