

Paper

**Common path or continuing divergence in welfare state reform:**

A longitudinal study of Norway and the Netherlands (1990-2020)

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**Introduction**

In recent decades, reforms in the welfare state and public services have been strongly influenced by New Public Management (NPM) and New Public Governance (NPG) (Fuertes et al. 2014; Jantz, Christensen and Lægreid 2015; Pollitt and Bouckaert 2017). Increasing efficiency through private sector methods has been a strong driver behind many NPM-type reforms (Aucoin 1990), and NPG ideas are reflected in intentions to make the administration more user-friendly, holistic and cooperative (Askim et al. 2011; Lægreid and Rykkja 2015; Reiter and Klenk 2019). Although the type and character of reform differ per country, an important common setting was the policy shift to 'activation' since the 1990s (Barbier 2015; Finn, Peromingo and Mwasikakata 2019), implying a change in focus from well-being to work, with a reduction of social expenditure and more flexibility of the labour market as important objectives (Hemerijck et al. 2012). 'Activation policies' often have been associated with shared governance characteristics, such as one-stop agencies, decentralisation, quasi-markets for service provision, reduced influence of social partners, performance management and the individualisation of social interventions (Fuertes et al. 2014; Knuth and Larsen 2010; Van Berkel 2009). Given the common premise of 'activation', convergence in developing similarities

in structures and processes of welfare administrations can be expected after three decades. Nevertheless, national institutional contexts may influence reform trajectories and lead to a (re)confirmation of differences between states (Champion and Bonoli 2011; Jantz et al. 2015; Pollitt and Bouckaert 2017).

In this paper, we examine to what extent convergence and/or divergence occurs in reform of the welfare state administration, which we broadly define as administration and delivery of employment services, social services and the benefit system (Christensen et al. 2009). Unlike many studies with a shorter time horizon, we take a longitudinal, comparative approach, studying reforms in two countries over three decades. The paper takes the following questions as a starting point for a discussion of the reforms: *What are the relationships and tensions between NPM and NPG, and how do we see these models reflected in the reforms in two welfare administrations? Is there growing convergence or divergence in the reform process and in current systems, and how can these tendencies be explained?* We first discuss how such questions are more generally addressed in literature on public sector reform. Then we examine the reform trajectories and their consequences for the present welfare administrations, in particular on two key themes (Knuth and Larsen 2010; Weishaupt 2011): the relationship between central and decentralized governance (levels), and the role and position of key stakeholders (e.g. clients, social partners). We do this by examining two of the largest public sector reforms in Norway and the Netherlands (Champion and Bonoli 2011). With the Norwegian Labour and Welfare Administration (NAV) in Norway (2006) and the Structure of the Administration of Work and Income (SUWI) in the Netherlands (2002), both countries chose for a major change of their institutional framework for public welfare and employment services

Next, we review literature on public sector reform to develop our analytical framework. We provide an overview of the methods and dataset as the basis of our empirical analysis. Our

findings are presented in two steps: we analyse the reform paths in Norway and the Netherlands over the past three decades, and then compare their impact on the present welfare administrations. Finally, we draw the lessons from the reforms in the two countries, and relate our findings to theory on public sector reform.

### **Theoretical context**

Literature on public sector reform distinguishes alternative, ideal-type governance models, including: the traditional model of public administration (TPA), new public management (NPM) and the new public governance (NPG) (or post-NPM) model, also called network governance (NG) (Ferlie and Ongaro 2022; Osborne 2010; Pollitt and Bouckaert 2017).

The TPA model has been characterized by a strict hierarchy, with permanent and neutral civil servants, who implement public policies that are determined solely by politics (Hughes 1998). Top-down planning, central regulation and control, and a high level professional expertise are main elements of the ‘traditional model’ that remained the most successful management model in the public sector for more than a century. Since the early 1980s, many countries have moved away from (some of) its principles and aimed to replace TPA for a rigid bureaucracy based on procedures rather than a focus on results (Hughes 1998). In the economic crisis of the 1970/80s and an expanding welfare state, more efficiency and manageability were sought and alternative models have emerged.

The well-known alternative NPM model is a doctrine for a more efficient, cheaper public sector that is more responsive to its citizens (‘customers’). NPM imported business concepts, such as management targets for performance, output measurement and contracts as main forms of coordination rather than hierarchical relationships (Hood 1991). It combined a central role for management with disaggregated organizational forms (such as business units and executive

organisations), and introduced market mechanisms such as competitive tenders and performance rankings (Hood 1991; Pollitt and Dan 2011). NPM has been very influential but showed huge variation and also received much criticism (Ehrler 2012; Lepuante and Van der Walle 2020; Pollitt and Bouckaert 2017). Its emphasis on private sector methods has been contested and NPM is criticized for centralised decision making by public managers, rather than supporting decentralization in public organizations as it claims (Mongkol 2011).

NPG (as a post-NPM model) promotes horizontal coordination between government and non-state actors to enhance broader legitimacy, support and resources for policy and implementation. NPG is often viewed a response to NPM-shortcomings (Klenk and Reiter 2019; Lapuente and Van der Walle 2020), but has its roots in older collaborative and network-based approaches (Ferlie and Ongaro 2022). In NPG, the pursuit of shared goals is central. Important elements are a holistic view of social problems, collaborative structures and joint leadership with cross-border skills (Van Berkel and Borghi 2007). Klenk and Reiter (2019) reveal that “the post-New Public Management idea has been very influential as an ‘ideational weapon’ to indicate a crisis of the New Public Management model”, but they question a (large) practical impact of the post-NPM ideas.

The origins of the three models have been situated as sequential in time (TPA-NPM-NPG), but empirical studies indicate that newer models are added to prior ones rather than replace them (Christensen et al. 2009; Greve, Lægreid, and Rykkja 2016). The result of the subsequent reforms is then an increasing hybridization, where various governance principles are used at the same time (Lægreid and Rykkja 2015; Van Berkel and Borghi 2007). Studies of hybrid public organisations show that principles derived from alternative reform models are not automatically well aligned (Fossestøl et al. 2015; Van Gestel, Denis and Ferlie 2020). Tensions have been identified between NPM and NPG due to mutual incompatibility; in particular between simultaneous aims for competition and collaboration (Qvist 2016). The question of

whether and how reform ideas based on alternative public management models can be successfully combined has not yet been answered (Hartley, Sørensen and Torfing 2013; Lepuante and Van der Walle 2020). More empirical work, especially with a longitudinal and comparative view, is needed to understand the long-term trends (Finn et al. 2019; Reiter and Klenk 2019).

Comparison of welfare state reforms raises the question of whether there are general patterns in terms of “convergence” or “divergence”. While convergence implies the reforms are moving in the same direction, divergence means that they are moving apart. In this paper, divergence and convergence are terms used to describe the directional relationship of the reforms in the two welfare administrations and of the current delivery systems in the two countries. For a long time, the welfare state literature has largely concentrated on substantive policies rather than pathways of reform and administrative styles (Champion and Bonoli 2011; Howlett 2002). In general, the public management literature has considered prominent patterns of transnational convergence toward NPM (OECD 1995; Pollitt and Dan 2011); though with different types and degrees in adopting NPM ideas in welfare administrations (Ehrler 2012; Knuth and Larsen 2010; Jantz et al. 2015). These differences are usually subscribed to variation in the institutional context, e.g. between unitary and federal states; liberal and social-democratic political traditions (Pollitt and Bouckaert 2017). It has been suggested that differences in the way national labour markets are governed and in the role of social partners can be explained by institutional legacies and ideological preferences (Christensen et al. 2009; Weishaupt 2011).

Different pathways are also noticed when it comes to how NPM ideas for collaborative, integrated services have influenced reform. A large comparative study (Scharle, Duell, Minas et al. 2018) distinguishes two reform paths of welfare administrations in Europe: a comprehensive model where case management transcends various policy areas and where services and organizations are merged; and a second, more voluntary model of service

integration with considerable freedom for local decisions and variation. The study points to the relevance of the institutional context to understand these differences, suggesting the first pathway requires a base of highly developed services and a strong public administration (e.g. Germany, Ireland, UK and the Basque Country) while in the second type of reform, NPG ideas are embedded in existing institutional frameworks with services less developed and constitutional barriers or limited capacity of public administration (e.g. France, Switzerland, Romania). Although neither Norway nor the Netherlands were part of the study, the authors suggest that Norway would fit the extended NPG variant, while the Netherlands may represent the more voluntary model (Scharle et al. 2018). So not only patterns of convergence are observed, but also those of significant divergence in reform of welfare administrations.

In this paper, we examine convergence and divergence in two welfare administrations and analyse how NPM and NPG can be recognized in reforms over three decades. We compare reforms in two ways: in each country over time and between the two nations. Our longitudinal study evaluates the process and administrative consequences of the NPM and NPG reforms that are controversial in theory and still little known in practice (Lepuante and Van der Walle 2020; Pollitt and Dan 2011; Reiter and Klenk 2019).

## **Methods**

Data for this paper are derived from key studies of both authors in analysing welfare state reforms in their respective countries between 1990 and 2020 (see Table 1).

**Table 1** Key publications on welfare state reform in Norway and the Netherlands

Norway	Netherlands
Study and key publication	Study and key publication
<b>Vocational rehabilitation reform 1991-92</b> <p>Andreassen, T.A. and Blystad, R. (1999). Sentral styring og lokal utvikling – om å lære og ikke lære av praksis (p.157-178), in: K. Fossetøl (ed.) <i>Mellom individ og marked: atføringsvirksomhet i velferdsstaten</i>, Oslo: Arbeidsforskningsinstituttet, AFIs skriftserie.</p>	<b>PES reform 1991</b> <p>Van Gestel, N. (1994). <i>De onzichtbare overheid. Naar nieuwe vormen van sturing, het voorbeeld van de Arbeidsvoorzieningswet</i>. Delft: Eburon. 272 pp.</p>
<b>NAV: Organizational change as welfare reform</b> <p>Andreassen, T.A. &amp; Fossetøl, K. (2011) NAV ved et veiskille: organisasjonsendring som velferdsreform. Gyldendal Akademisk. 279 p.</p>	<b>SUWI reform 2002</b> <p>Bekke, H. &amp; Van Gestel, N. (2004). <i>Publiek Verzekerd. Voorgeschiedenis en start van het Uitvoeringsinstituut Werknemersverzekeringen (UWV), 1993-2003</i>. Antwerpen-Apeldoorn: Garant. 253 p.</p>
<b>NAV reform, 2006-2015</b> <p>Andreassen, T.A. &amp; Aars, J. (2015). Den store reformen. Da NAV ble til. Universitetsforlaget. 184 pp.</p>	<b>Welfare state reform 1980 - 2008</b> <p>Van Gestel, N., De Beer, P. T. &amp; Van der Meer, M. (2009). <i>Het hervormingsmoeras van de verzorgingsstaat. Veranderingen in de organisatie van de sociale zekerheid</i>. Amsterdam University Press. 201 pp.</p>
<b>Organizational views on cooperation in welfare</b> <p>Breit, E.M.A. &amp; Andreassen, T.A. (2021). Organisatoriske blikk på samarbeid i velferdstjenester. <i>Tidsskrift for velferdsforskning</i>, 24 (01), 7-20.</p>	<b>The future of the welfare state</b> <p>Van Gestel, N., Vossen, E., Oomens, P. &amp; Hollanders, D. (2013). <i>Toekomst van de Sociale Zekerheid: over provisie, preventie en participatie</i>. Den Haag: Boom/Lemma. 238 p.</p>
<b>The ‘new era’ NAV reform</b> <p>Breit, E., Andreassen, T.A., Fossetøl, K. (2022) Development of hybrid professionalism: street-level managers’ work and the enabling conditions of public reform. <i>Public Management Review</i>, online.</p>	<b>Network governance in labour market regions</b> <p>Van Gestel, N. &amp; Grotenbreg, S. (2021). Collaborative governance and innovation in public services settings. <i>Policy &amp; Politics</i>, 49(2), 249-265.</p>

The studies mainly use qualitative methods and are based on literature, interviews and documents. To illustrate, in a recent study of regional network governance in the Dutch welfare administration, 37 (group) interviews with 64 managers, professionals and stakeholders were

conducted (2019-2020)<sup>1</sup>. In Norway, we drew for recent data on the 2019 evaluation of the implementation of the white paper “NAV in a new era”<sup>2</sup>, involving interviews with employees and managers from frontline organizations and regional administrations (94 persons in total). For our studies on welfare governance reform in both countries, we also extensively reviewed public documents, such as government proposals to parliament, reports from public committees, and monitoring and evaluation reports.

Our analytical approach draws on a narrative strategy (Langley, 1999), in which we sought to construct a detailed story as a way of obtaining an overall understanding of the reform processes in each country over three decades. We used the governance models as described in the theory section to gain an understanding of whether the reform trajectories reflect NPM and NPG ideas. The following step in our data analysis was a cross-national comparison of reform ideas in different phases of the reforms and in the current welfare administrations, to identify convergence and/or divergence.

Next, we first analyse the major reforms over the past three decades in both countries and then compare their impact on the current welfare administrations.

### **Growing convergence in reform paths**

Since the 1990s, remarkable changes can be mentioned in both countries. Although there lately is growing convergence in reform (since 2008), significant divergence characterizes the earlier phases. The main shifts over three decades are shown in Table 2.

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<sup>1</sup> Case studies with S. Grotenbreg (2019), and M. Kuiper (2020), in the EU H2020 project “Co-Production and Co-Governance: Strategic Management, Public Value and Co-Creation in the Renewal of Public Agencies across Europe”, [www.cogov.eu](http://www.cogov.eu)

<sup>2</sup> Other researchers in this project are E. Breit and C. Rønningstad.



**Table 2** Main shifts in the welfare administrations of Norway and the Netherlands

<b>Time period</b>	<b>Norway</b>	<b>The Netherlands</b>
Before 1990	The Public employment service (PES) was a sector-based, executive agency. It was not part of the ministry but instructed by it, with some independence. PES was separated from the sectoral organization of national insurance benefits and the municipal responsibility for social assistance (TPA).	The Public employment service (PES) was a ministry department, centrally governed and known for its strong state hierarchy. PES was strictly separated from the sectoral organizations of national insurance benefits, that were governed by social partners, and also separated from the municipal responsibility for social assistance (TPA).
Since 1990	The national insurance administration (NIA) and PES remain hierarchies (TPA), but financial means were introduced to transform sheltered workshops into vocational rehabilitation enterprises working on contract with the PES, as well as increased use of private deliverers of activation programs targeting the unemployed (NPM)	In 1991, PES shifted from a traditional government department (TPA) to an independent agency, financed by the central state but governed by collaborative networks of three parties: government, unions, and employer' associations, both at the national and regional level (NPG). The national insurance administration came under political pressure to be privatized.
Early 2000 -	2006: The Norwegian Labour and Welfare Administration (NAV) is founded as a merger of Social benefits, PES and local municipal services, to offer integrated, client-centred services (NPG)	2002: SUWI: A new public body for social benefits, UWV, is a merger of five insurance agencies previously run by social partners; PES are outsourced to a private re-integration market; work registration is established in new public Centres for Work and Income (TPA/NPM)
2008 -	The NAV administration of social benefits goes back to the national level; increased national control. No direct budget cuts but increased competitive tendering in the provision of labour market measures (NPM)	Merger between UWV and CWI; focus on efficiency and budget cuts, limited budget for outsourcing to private re-integration services; full switch to digital services for national insurance benefits and PES in 2012, for efficiency reasons (NPM)
2015 - 2020	Central steering and control being reduced; more local autonomy, increased insourcing of Active labour market programs and more attention to professionalism (NPG)	Decentralization with the Participation Act, a larger role for municipalities in social policy and PES. The Jobs Agreement 2013 is to be executed with social partners and UWV in 35 regions (NPG)
2020 -	Reinforcing the trend from 2015; but also the merger of municipalities and NAV offices into much larger frontline organizations (NPG/NPM)	Continuing the trend from 2015; but also the central roll-out of Regional Mobility Teams and announcement of a 'new' total structure with Regional Work Centers (NPG/NPM)

We elaborate on the reform process below.

### *Norway*

In the 1990s, before the NAV reform, the national insurance administration (NIA) and the public employment service (PES) were separate hierarchies; NIA more a TPA type organisation, instructing the local NIA offices, and PES more a NPM governed administration.

Labour market programs were outsourced through a buyer-supplier model, in the expectation that this would allow for easy upscaling and downscaling of services, parallel to the economic situation. Tasks left with the PES were assessment and referral to programs. During the same period, efforts were made to transform sheltered workshops into vocational/reintegration service providers. Their services were increasingly subject to competition and tenders.

The NAV reform followed earlier incremental efforts to stimulate local cooperation between the NIA, PES and the municipalities. These were hampered by bureaucratic boundaries at the national level, leading parliament to direct the government to propose reform. The first proposal contained only minor changes; it was rejected by parliament and sent back to government, where the new minister argued that a merger at the national level (between PES and NIA) was necessary to achieve cooperation at the local level. So we see here incremental steps leading to an impasse, followed by political pressure for a more radical shift.

Characterizing the Norwegian reform trajectory since 2000, Breit et al. (2022) identify three phases. The first phase (2000–2007) involves the establishment of the new NAV organization, and experimentation with integrated work forms. The NAV reform included a merger between the two state administrations (for National Insurance and Labour Market) and municipal welfare services in one-stop local agencies, and the PES moved from a buyer-supplier model to integration and some decentralisation. With its weight on horizontal coordination and autonomy at the local level, the NAV reform displayed traces of a NPG paradigm that frontline managers during the reform process operationalised in a more integrated office.

In 2008–2014, a broader reform followed to increase efficiency, e.g. by re-centralization of the national insurance administration, (digital) standardized work tools for client services and performance indicators and requirements regarding documentation (Andreassen 2019; Jantz et al. 2015). This second phase involved a roll back and a return to NPM ideas, an effort to turn the frontline offices into single purpose organizations for employment services only (preferable

to the most job-ready clients) by reducing the number of municipal services and the withdrawal of national insurance benefit case processing to regional administrative units. Additionally, the ministry and the NAV directorate governed the frontline offices through performance measures and efforts to standardise the organizational design and the work of the frontline offices (Jantz et al. 2015; Andreassen 2019). Unlike the Netherlands, rising unemployment did not lead to cutbacks but to higher budgets for labour market measures.

From 2015, a third policy change breathed new life into the importance of professionalism in service provision. In many ways, the NAV returned to the original reform ideas of the early 2000s, underlining integrated services and local self-government in developing new forms of professionalism and experimentation at the street level (Fossestøl, Borg and Breit 2020). This phase included a return to NPG ideas of horizontal coordination within and outside the NAV offices, and a greater focus on professionalism and clients with more complex issues, in need of coordinated services across policy sectors and professional jurisdictions. There is more digitization of communication with clients, but depending on the local NAV manager. In recent years, the trend from 2015 has strengthened, but we also notice the merger of municipalities and NAV offices into much larger first-line organizations, which points to NPM ideas for efficiency at a decentralized level.

In sum, in Norway we see a move from a TPA/NPM based system in the 1990s to NPG in the early 2000s, followed by more emphasis on NPM at the end of 2000s and a revival of NPG since 2015. The current trend is reinforcing the NPG reform but also a move towards more efficiency (NPM) with municipal mergers and larger regional NAV agencies, argued to strengthen professionalization and specialization. The next section will show that the Dutch reform of the welfare administration ultimately has many parallels with the Norwegian one (growing convergence), but along a completely divergent route.

## *Netherlands*

Traditionally, and similar to Norway, there was a strong division between the welfare administration of social benefits, PES, and social assistance. Social benefits in the Netherlands were executed by sectoral organizations governed by social partners; PES was a central government department and social assistance the traditional domain of municipalities. The welfare system was increasingly criticized in the 1980s for high unemployment and disability, and a low degree of activation (Van Oorschot 2006). The PES hierarchy increasingly came under fire for its inability to reverse this trend. After ten years of negotiations between government and social partners, this resulted in a radical reform (PES Act 1990) for a new governance structure with central and regional three-party boards with equal seats for government, employers' associations and unions (3-3-3). So we see here the idea of collaborative networks on a horizontal basis (NPG), in contrast with a principal-agent model (NPM) for PES in Norway in the 1990s.

In 2002, the Dutch government implemented a much wider reform with the SUWI Act, encompassing a completely new organizational structure for both social benefits and the PES. The SUWI reform came after endless negotiations since 1994 for 'marketization' in the benefit administration that resulted in an impasse (Van Gestel and Hillebrand 2011). Different from the NAV reform in Norway, SUWI was a typical combination of TPA and NPM, with a minor role for NPG. A large national organization (UWV) was created from a merger of five sector organizations for the implementation of benefits, formerly led by social partners and now centrally managed by the Ministry of Social Affairs and Employment (a switch to TPA). At the same time, PES' job matching task was outsourced to private agencies, in a principal-agent model (NPM) where UWV, municipalities and employers had to act as principals. New Centers for Work and Income (CWI) were set up for the first registration for benefits and assistance.

The UWV, CWI and municipalities were expected to offer 'integrated services', but the how was left open.

In 2008 we saw a merger of UWV and CWI which can be regarded as a re-establishment of the PES, but with limited tasks and significant cutbacks. NPM-type reform became even stronger in the aftermath of the financial and economic crisis and growing unemployment. The already minor role of NPG in the original SUWI reform (2002) received even less political support these years: UWV and municipalities were no longer expected to provide integrated one-stop-shop services (SUWI Act 2012), justifying the closure of two-thirds of the 98 shared job centers which had been laboriously built up over the past decade. The national government made further major cutbacks at the UWV, as a result of which 50% of the work coaches lost their jobs and personal contact with clients was replaced by full digitization for most clients. In the general trend towards maximum efficiency (NPM), also sheltered workshops were no longer allowed to take on new clients that are supposed to find a 'regular job' at the labour market.

In 2015, as in Norway, but in the Netherlands boosted by a social agreement with the social partners in 2013, we see some revival of NPG in horizontal cooperation of government authorities (municipalities and UWV) and social partners in 35 'labour market regions'. Regional Boards (Work Chambers) should coordinate the implementation of the Jobs Agreement Act (2015) as part of the social agreement with social partners, aiming for 125.000 jobs in 2026 for people with physical and/or mental handicaps. With the Participation Act (2015), local governments should conduct and integrate diverse social services (next to income support) and the largest municipality in each region has to coordinate regional collaboration with public and private parties for implementing the Jobs Agreement.

Although policy rhetoric was much about "decentralisation" in the Netherlands since 2015, national regulations and conditions, e.g. for one service point to employers in each region and subsidized labour market projects showed a gradual tendency toward recentralisation and

standardization. In 2020, the Dutch government together with social partners, UWV and municipalities initiated Regional Mobility Teams (RMTs) to deal with an expected high job loss due to the Covid-19 pandemic. Here NPG ideas of holistic services and collaboration between public and private partners returned to the reform agenda. In the latest revision of the SUWI Act (2021), the RMTs were legally grounded, and a wider reform for Regional Work Centres is initiated by the national government.<sup>3</sup> So there is reinforcement of the NPG trend from 2015; but with a larger role of central government and social partners despite ‘decentralization’.

In sum, the Netherlands initially took an opposite reform trajectory than Norway in the 1990s, with a move to NPG for PES instead of Norway with a more traditional administration (TPA) combined with a principal-agent model (NPM). In the next decade, both countries switched their system in opposite directions, with the SUWI reform in 2002 (TPA/NPM) and the NAV reform in 2006 (NPG). Reform in both countries thus shows major divergence, both over time and between the two nations. Since 2008, we have seen more convergence as both nations have adopted (or extended) NPM to increase efficiency. Subsequent convergence is also visible in reforms (2015) for decentralization and street-level professionalism (NPG); and most recently in recentralization and standardization (NPM) alongside a continued push for collaborative, person-centred services (NPG). So there is growing hybridity, but not necessarily more balance in welfare state governance.

### **Divergence between Norway and the Netherlands in the current welfare administrations**

Despite growing convergence in reform trends over the past 15 years, there is significant divergence between the current two welfare administrations. We focus here on two key themes:

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<sup>3</sup> Letter to Parliament from the Ministry of Social Affairs and Employment, 11 October 2022. Policy proposal to be further developed in 2023 and implemented in 2024.

the relationship between central and decentralized governance (levels) and the role and position of key stakeholders (clients, social partners).

*Divergence in the relationship between governance levels (see Table 3)*

At the ministry level in Norway, both the state and the municipal part of NAV are the responsibility of Ministry of Labour and Social Inclusion. From the establishment of NAV in 2006, there were 456 local/regional offices, small and large. NAV consists of two hierarchies: 1) a state hierarchy of the directorate (national agency), regional offices and frontline offices, governed hierarchically, by instructions (although with a certain level of local autonomy), 2) a relationship from the national level (the directorate), via supervision authorities at the regional level inspecting that municipalities fill their legal obligation to provide social services to the citizens. Cooperation at the local level can be voluntarily extended with other municipal social services, for example social housing, debt counselling, or for integration of newly arrived immigrants (mostly refugees). Additionally, the frontline organizations cooperate with other municipal services such as services for people with problems on (mental) health and drugs abuse.

The NAV governance system is complicated in more ways: The regional offices (at the provincial level) are only "state" offices, with no role for municipalities. Also, the NAV directorate is both the highest management (of employment services and national insurances) with instructional authority, and supervisor (of municipal social services) but without instructional authority.<sup>4</sup> As a result of mergers between municipalities and formalized cooperation between many NAV offices, the number of first-line offices was reduced to 268 since 2020, with a simultaneous increase in scale to enable more "robust", professional offices. This will probably result in more internal specialization and less voice for the municipalities.

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<sup>4</sup> See: <https://www.statsforvalteren.no/en/>

**Table 3** Central and decentralized governance in two welfare administrations

	<b>Norway</b>	<b>Netherlands</b>
Central Ministry	Ministry of Labour and Social Inclusion	Ministry of Social Affairs and Employment
Organization	United organization: The NAV is composed of a central agency and elements of the municipal social service systems: A national NAV, with 268 NAV offices in municipalities and city boroughs (regions)	Separate organizations: A national executive agency UWV, with 35 offices in 35 labour market regions. 342 municipalities, organizing social assistance and/or PES in diverse ways: (joint) municipal service or outsourced, e.g. to a (municipal) social work company.
Income provision	All tasks in one hand The NAV administers a large proportion of the most important welfare benefits and social security schemes in Norwegian society, e.g. unemployment benefits, sickness benefit, work assessment allowance, disability pension, and retirement pension on reaching pensionable age.	Divided tasks The UWV administers unemployment - and disability benefits. Municipalities provide social assistance. Sickness benefits are privatized to employers, with some exceptions (i.e. pregnancy). The basis public retirement pension is administered by a separate national agency, the Social Insurance Bank (SVB).
Employment services	Focus on all jobseekers and employers NAV is required by law to provide all jobseekers with advice and help, in practice by information on the web and through a digital register of jobseekers and vacancies. In this context, the NAV also provides assistance to employers looking for new staff. The frontline NAV offices primarily serve jobseekers with reduced work capacity.	Focus on clients with income assistance UWV is required by law to provide jobseekers with information and digital help, when they are unemployed and insured for social benefits. UWV also provides some assistance to employers looking for new staff, but is formally not required (and financed) to do so. Municipalities organize social and employment services to people in social assistance.

The Dutch welfare administration is managed differently, but the relationship between levels of government is just as complicated. Unlike the NAV, the national state agency UWV and the 342 Dutch municipalities (2023) are separate public agencies. There is a split in regulation, clients and tasks: UWV is responsible for social benefits and employment services to the insured population of unemployed and disabled. Municipalities are responsible for social assistance and related services to the unemployed without acquired rights for insurance based benefits or other income means (partner income, savings, house etc.). As a national executive agency, UWV is governed within ministerial authority (but with a certain leeway). But municipalities have formal autonomy, even though many tasks are delegated and financed by the central state. The UWV and municipalities in 35 labour market regions are obliged to



cooperate with social partners for the Jobs Agreement Act 2015 (and for regional labour market projects subsidized by national government), but neither the central level nor the local government (or social partners) have instructional authority and they will all have to arrive at shared goals and decisions.

*Divergence between Norway and Netherlands in relationships with key stakeholders (Table 4)*

Increasingly the NAV offices are serving clients with reduced work capacity (not only caused by health conditions). Contact between jobseekers and employers is digitised and based on self-service. Retirement pension is digitised, so is income security under parental leave. Related to the NAV reform, the Directorate established “user councils” at the central, regional, and local level with members representing associations of clients as well as the employers (although not particularly well-functioning at the local level). New mandates for the councils were given in 2015. At the central level, the council is now described as a collaborative forum and an advisory body.

The Dutch UWV is serving only the insured clients with a work history. Contact between jobseekers and UWV is digitised and based on self-service, with face-to-face contact especially for the ‘hard-to-place’. Municipalities serve clients on social assistance. With the SUWI reform, the Ministry established “user councils” at the central and local level with members representing associations of clients. Municipalities also have client councils, often volunteers. At the central level, the client council (LCR) is described as an advisory body. They are only asked for advice by the government on policy implementation, not on policy or legislation itself.

**Table 4** Welfare administrations: Relationships with clients and partners

	<b>Norway</b>	<b>Netherlands</b>
Clients	NAV: All citizens who need help with income assistance, PES and related social policy, at the local level, primarily jobseekers with reduced work capacity. Other jobseekers and benefit applicants are referred to digitised self-service and call-centres.	UWV: citizens dependent on social benefits, mainly digital self-service and face to face support for the hard-to-place. Municipalities: citizens with social assistance. People with long term mental or physical handicaps are referred to

		municipal social work or Social work enterprises.
Public/private partners	Mainly public partners Collaboration within NAV with local authorities for the tasks (see Table 3), regulated by law. Collaboration can be extended at the local level on a voluntary basis for additional services (e.g. related to health problems, drugs abuse, social problems)	Public and private partners Collaboration in Regional Work Chambers by local governments, UWV and social partners, for legal tasks as the Jobs Agreement Act 2015; a shared regional service point for employers; activation projects subsidized by the Ministry (Perspective on Work, 2019); and Regional mobility teams (since 2021).
Type of collaboration	Public parties: Obligated and quite standardized at the partnership level; voluntary and varying in inter-agency collaboration at the local level.  Social partners: On the basis of the Tripartite agreement and the Inclusion initiative (with employers).  Clients: there are advisory bodies of “service users” (jobseekers, clients and employers).	Public partners: Diverse at the regional level; obliged only for specific tasks (Jobs Agreement). Voluntary and varying in local/regional inter-agency collaboration.  Social partners: A formal governing role of social partners in national and regional labour market platforms (since 2015).  Client organisations have an advisory role on implementation issues, via the ministry, or UWV or municipalities.

In Norway, social partners do not have a governing role in the welfare administration for long now. Before 1999 the Directorate of labour had a board with members of the social partners; in 1999 this board was replaced by an advisory council, with additional employer and employee associations. The ministry argued that this was in compliance with the ILO obligations. From 2004 the Ministry has had a council for labour market and pension policy with social partners as members. Another kind of involvement of the social partners is the steady progress of so-called tripartite agreements on a more inclusive working life (the first concluded in 2001), aimed at preventing and reducing absenteeism and withdrawal from working life, previously also at the inclusion of people with disabilities and other groups outside the labour market. The latter goal has been removed from the agreement and replaced by a so-called “Inkluderingsdugnad” – a type of voluntary joint effort, introduced in 2018.

In the Netherlands, before 2002, social partners had a strong governing role in the welfare administration. With the SUWI reform, the social partners lost all their power in the executive

bodies of social benefits and the PES, which was a major shock in the Dutch corporatist landscape. The former governing role of the social partners in social benefits was moved to a national state agency (UWV) and their major role in the PES board was ‘replaced’ by an advisory body (the Council for Work and Income, 2002-2012). In 2013, the social partners reached a so called “social agreement” with the government, including a Jobs Agreement for people with (physical/mental) disabilities. In 2015, this led to a certain return of social partners in the governance of the Dutch welfare administration, as members of the Central and Regional Work Chambers of the 35 Dutch labour market regions. Despite this role, their current position is much less direct and powerful than it was before 2002.

In short, divergence between current systems is expressed for both ‘levels’ and ‘stakeholders’. Compared to the Netherlands, the Norwegian system has a much stronger degree of (compulsory) cooperation between the state and the municipalities (levels). However, the role of the social partners in the governance of the activation policy is stronger in the Netherlands. Clients are represented in advisory bodies in both countries, without a direct governing role.

## **Discussion**

In this paper we analysed whether reform trajectories in two welfare administrations reflect NPM and NPG ideas, and how the relationships between levels of government and between public and private stakeholders evolved into the current design of the welfare administrations. Three main lessons about convergence and divergence can be learned from our longitudinal study.

### *Growing convergence and hybridity in reform*

We have seen more convergence in reform paths lately but after an equally long period of strong divergence. In the first decade since 1990, both countries changed their welfare administration

twice, and both times in different directions; we call this a ‘double divergence’ (over time and between nations). While Champion and Bonoli (2011) perceived the NAV and SUWI reform as having similar characteristics, our findings suggest they represent different governance models: NPG ideas were prominent in the original 2006 NAV reform (Breit et al. 2022), and NPM ideas are clearly reflected in the 2002 SUWI reform (Van Gestel and Herbillon 2007). Lately we saw more convergence in reform trajectories: a joint adoption of NPM in both countries (2008-2014) and a shared resurgence of NPG ideas (since 2015), in line with the broader international trend towards decentralization and collaborative services (Finn et al. 2019). Recently both countries have again made efforts towards greater standardization and efficiency (NPM). Although there seems increasing convergence in reforms between the two countries, it is early to say whether it will persist, as the period of (more) convergence lasts about as long as the previous divergent reforms.

Related to the many shifts in governance since 1990, both countries have developed more hybrid and complex systems over time. Alternating NPM and post-NPM, all reforms criticized the previously dominant organization of the welfare state according to traditional hierarchy and functional differentiation. But despite their often radical character, reforms did not completely replace previous models (see also, Christensen et al. 2009; Fossetøl et al. 2015; Greve et al. 2016; Lægreid and Rykkja 2015). Although hybridity with coexisting, overlapping and partly competing elements can be viewed “the rule rather than the exception of the new modes of governance currently being practiced in the provision of social services” (Van Berkel and Borghi 2007, p.283), so far the frequent reforms do not indicate that the different principles of TPA, NPM and NPG are well aligned. At least more balanced combinations of public management models appear necessary to prevent hybridity in a form of barely cohesive layers.

*Divergence between nations and policy fields*

A second lesson is that increasing convergence in reform paths does not necessarily imply more similar welfare administrations (see also, Christensen et al. 2009). On the contrary, despite greater convergence in reforms since 2008, the present welfare administrations in Norway and the Netherlands are more different than alike (see Tables 3 and 4). Norway and the Netherlands thus proved to be two cases that can illustrate how a common 'activation' policy has led to significantly different welfare administrations.

Divergence usually points to the need for contextualized research as it is expected that the new welfare administrations take on a specific form due to different (national) socio-economic, institutional and political contexts (Pollitt and Bouckaert 2017; Van Berkel and Borghi 2007). For example, Christensen et al. (2009, p. 1003) found "a strong element of path dependence in the reform trajectories" in a comparison of Germany, the UK and Norway. Champion and Bonoli (2011, p.330) described the impact of path dependence as "once a country has started down a path, it becomes increasingly difficult and costly to completely depart from it", given increasing returns on prior investments. Contrasting, in our study path dependency does not seem an obvious explanation for the different reform paths and their impact on welfare administrations. After all, path dependence would imply that the initial path is reproduced in both countries, which is very different from the radical shifts we found over the past 30 years, most prominently in NAV and SUWI.

Also, it has been debated if economic crises and 'activation policies' have triggered similar reform trends across countries (Hemerijck et al. 2012; OECD 1995). For example, the economic crisis since 2008 (with the government in a strong role for saving banks) could easily be viewed an important driver of common NPM-type interventions for efficiency gains in welfare administrations (Hemerijck et al. 2012). It is tempting to link such an explanation e.g. to NAV's return of the benefit administration to the central level (2008) and SUWI's merger of UWV and CWI (2009). But economic crises may also be a welcome excuse for national governments

rather than a driver for administrative reform - as the said shifts in NAV and SUWI were already planned in 2006 and 2007, before the banks in 2008 erupted. So we should be careful to give too much explanatory power to common economic pressures.

To better understand governance/organizational reforms and hybrid shifts in governance regimes, we may need to delve deeper into the specificity of the policy field in which these shifts are taking place (see also Greve et al. 2016). Our study highlights important differences between the subfields in the welfare administrations. For example, there appears to be growing scope for decentralized actors and organizations in the PES, but the benefit administration shows an opposite trend towards (more) centralization. This might be related to the specific tasks and risks in national social insurance where decentralization could be less effective for large, automated systems and increase the risk of error. Conversely, the services provided by PES are closely tied to the local/regional labour market, and require cooperation with third parties and beyond professional borders to be effective, so here decentralization is a recurrent trend.

Our study also found a certain order in the reforms of the different areas of welfare administration over time that may help explain divergence and convergence. In both countries reforms started in the 1990s with PES - a relatively small field compared to the social benefits administration in terms of public finance, vested interests of social partners, and employee numbers - , and in the 2000s reforms were expanded to the much larger field of social benefits. Despite the fact that we observed divergence between the leading public management models in the reforms in both countries, we view convergence in a similar attempt to enlarge the initial reform area of PES to the large field of social benefits in establishing a much wider reform (NAV and SUWI). Viewed in this way, there is divergence in reform trends between the two countries in terms of dominant NPG or NPM ideas, but convergence in increasingly comprehensive reform.

### *Governance levels and relationships between stakeholders*

A third lesson is that the (political) preference for central or decentral governance and for involving parties other than the government in the welfare administration can rapidly change. Norway has been described as social democratic (Christensen et al. 2009) and the Netherlands as corporatist (Van Berkel 2009), each with a tradition of strong relations with interest groups, social partners and civil society organizations. Both countries have then moved to coordination by 'market' and 'management' within a wider frame of state hierarchy and with a less crucial role of social partners in the welfare administration. However, we also saw divergence, especially in the past decade, that led to a certain "revival" of social partnership in the Netherlands, but not so much in Norway. This divergence needs more investigation. More broadly, we may ask is the reduced role of social partners over the past decades merely an effect of a political preference for 'more state' and/or 'more market', or is it the specific position of social partners in relationship with other policy areas or issues (e.g. pensions), that can explain differences between countries?

Critical doubts may also arise about reform trends that are often taken for granted in many policy studies, e.g. decentralization, outsourcing or client orientation. For example, Weishaupt (2011) suggested decentralization could also be viewed as a process of recentralization where regional and local authorities are used as transmitters of national policy. Our study notices a common trend in Norway and the Netherlands where regional offices (from NAV, UWV), and also municipalities and regional networks (e.g. the Dutch Regional Work Chambers) receive cumulative responsibilities, but at the same time operate under more central regulation and demands for efficiency. Our paper also pointed to the complexity associated with decentralization, where (smaller) municipalities have to scale up through mergers, joint intermunicipal social services or outsourcing to private and/or non-profit organisations (see also, Rice 2012).

Moreover, welfare administrations are coordinated in a multi-level environment (Lægreid and Rykkja 2015), where not only PES, social benefits and social assistance are involved, but also other policy areas (e.g. health, education). Especially in the NPG reforms, more and more actors are involved within the various administrative levels that have different views on the service provision and the organizational and administrative principles (Van Gestel and Grotenbreg 2019). More research is needed of this wider policy context and organizations, in light of the importance of optimizing welfare administrations and the ongoing struggle between central and regional needs and related stakeholders to influence social and labour market policies.

## **Conclusions**

In this paper, Norway and the Netherlands have been used as critical cases to analyse convergence and divergence in reform efforts and their impact on the current welfare administrations. The two countries represent a general trend to change the labour market and social security system towards more "active" welfare states, to improve service coordination and responsiveness to client needs, and increase efficiency and innovation in service delivery (Bonoli 2011; Van Berkel 2009). Their successive changes in social security and the promotion of paid work, as well as reforms in structure and coordination, such as the introduction of marketization in PES or the establishment of one stop-shops, reflect a broader international modernization trend visible in many OECD countries (Considine and Lewis 2012; Finn et al. 2019; Fuertes et al. 2014; Jantz et al. 2015; Knuth and Larsen 2010). We found that both countries significantly reformed their systems for welfare and employment services, using elements of NPM and post-NPM models, first moving in divergent ways and later showing more convergence in reform paths. However, although the welfare administrations in both countries significantly changed with increasingly similar types of reform, their current characteristics are more different than alike.



One conclusion is that a theory of public sector reform that aims to capture the role of NPM and NPG ideas in new welfare state arrangements should encompass the wider institutional context. Such a theory should go beyond the assumptions of the public management models and allow more room for explanations that take into account the (social, historic and economic) environment in which those reforms take place (Barbier 2015; Lægreid and Rykkja 2015; Lepuante and Van der Walle 2020). However, as demonstrated by the radical reforms in both countries, path dependency did not explain divergence in our cases. Also the wider economic environment and economic crises did not fully explain divergence or convergence in reform. It has been noted that there is no clear explanation for variation in administrative reforms and their effects (Pollitt and Bouckaert 2017; Christensen and Lægreid 2012) and there are still many differences in Europe when it comes to administrative reform. However, these are influenced not only by national institutions, but also by other institutional characteristics, “such as differences between ministries and agencies, policy areas, degree of autonomy and size of the organization” (Greve et al. 2016). Rather than the usual focus on high-level institutional context factors (Christensen et al. 2009; Pollitt and Bouckaert 2017; Weishaupt 2011), we suggest to dive more deeply in the (political) decision-making process, and the relationships between different policy fields, levels and stakeholders in understanding reform.

Another conclusion is that a long-term research perspective is crucial to understand the complex interplay between NPM and NPG ideas and wider context factors as drivers of reform (see also Considine and Lewis 2012; Jantz et al. 2015; Knuth and Larsen 2015). When studying characteristics of welfare administrations over relatively short periods, findings may only reflect a “temporary truth” (Van Gestel and Hillebrand 2011). For example, comparing Norway and the Netherlands in the 1990s and early 2000s would have stressed their most different pathways of change rather than the later convergence. Also, certain stakeholders can take on different roles over time. For example, the social partners are more important in the past and

present Dutch welfare administration compared to Norway, but studying their role exclusively between 2000 and 2013/2015 would have shown that the social partners were virtually absent in the Dutch welfare administration (except pension fund boards). These are important arguments for longitudinal studies to draw more balanced conclusions about public sector reform.

Our study also raises some further questions for future research. For example, in 2015, well after the crisis of 2008, a reform followed in both countries with a 'revival' of NPG ideas and a focus on decentralization. This raises the question of whether NPG-type reforms are contingent on relatively favourable economic conditions? Another fundamental issue is how different NPG reforms actually are from TPA and NPM? As Lapuente and Van der Walle (2020) argued: "Post-NPM represents a reassertion of old public administration values as well an attempt to remedy some of the disintegrating tendencies associated with NPM, and not an abandonment of NPM reforms." (p.463). Other scholars have theoretically questioned if the models are internally consistent: NPM has at least two faces: market and management (Pollitt and Dan 2011; Mongkol, 2011); and also NPG would have many meanings (Reiter and Klenk 2019; Lapuente and Van der Walle 2020). However, we have shown in this paper that despite internal variety, the NPM and NPG models can be used to uncover convergence and divergence in reform characteristics and their impact on welfare administrations over time.

A final issue for further study is about radical - versus incremental reform. Pollitt and Dan (2011, p.47) argued that "The structure of political system may be facilitating or inhibiting for rapid or large-scale reform. The incremental decision-making process in, say, Norway or the Netherlands is more likely to inhibit such reform whereas the centralized, majoritarian system in the UK and a more consensual one is more likely to facilitate reform" (see also, Pollitt and Bouckaert 2017). We found the opposite effect in Norway and the Netherlands, where large-scale reform took place despite the incremental process. Or should we say that radical, large-

scale reform follows up on incremental decision-making that did not lead to consensus? Then it is the stalemate that facilitates a quite sudden, large-scale reform, especially when a political majority wants to leave behind the previous system (see also, Van Gestel and Hillebrand 2011). To foster understanding of public sector reform, these issues need more attention in future comparative research.

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