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Adopt or Adapt? Unpacking the Role of Institutional Work Processes in the Implementation of New Regulations

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Abstract

Building on a longitudinal study of the implementation of a new regulation and a framework of institutional work, this article makes three contributions: first, it explains how nonpowerful regulatees, by engaging in *mobilization* and *cultivation*, can change the power balance in the field and adjust the regulation to their local setting. Second, it takes a processual view and develops a conceptual model of how the implementation process unfolds through four waves; *initial impact*, *response*, *recovery*, and *stabilization*. Third, it shows how the studied actors combine contradictory institutional logics to legitimize their practices and resolve institutional complexity. Thus, it adds new insights into how actors, by engaging in collective and discursive institutional work, can influence both the implementation process and the regulation itself.

Introduction

Day-to-day activities in public sector organizations are largely influenced by transnational regulations such as European Union directives and the Agreement on Government Procurement (Djelic and Sahlin-Andersson 2006). From the regulated organizations' perspective, transnational regulations are often crafted elsewhere, outside the organizations' geographical and industrial realm, and not easily translated to their local settings and everyday practices (Djelic and Sahlin-Andersson 2006). Thus, organizations struggle to meet various and often conflicting demands on how to perform key activities (Smets et al. 2015). This particularly applies in the public sector, which is regulated by both national law and transnational regulations, and is subject to scrutiny by government and media (Meyer and Hammerschmid 2006).

As regulations change, well-established practices and norms risk being challenged, deemed inappropriate and replaced with new ones (Cloutier et al. 2016). Previous research shows that such changes can lead to unexpected outcomes, conflicts, and resistance, and can have far-reaching effects on the regulated organizations (Cloutier et al. 2016; Greenwood, Suddaby, and Hinings 2002). It also shows that the implementations of transnational regulations "are often associated with significant gaps between the intended content and purpose of the regulation and its actual implementation at the national level" (Canning and O'Dwyer 2013, 191). However, despite the vast literature on implementation, a detailed understanding of the process leading up to these outcomes is largely missing (Cloutier et al. 2016). Inspired by what O'Toole (2000, 273) refers to as the "core question of implementation," namely "what happens between the establishment of policy and its impact in the world of action," we set out to explore the process of implementation. We include both regulators and regulatees in the analysis, as well as how they influence each other and the implementation process

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(Canning and O'Dwyer 2013; Clemens and Douglas 2005; Hupe 2014).

In doing so, we follow recent developments within public administration research and build on the literature on institutional change and work (Cloutier et al. 2016). Previous research has argued that regulatory changes are particularly problematic for public organizations to accommodate when new and old regulations build on different institutional logics providing "incompatible prescriptions," leading to institutional complexity (Greenwood et al. 2011, 317; Meyer and Hammerschmid 2006). The institutional complexity is further accentuated when the old institutional logic is not fully replaced by the regulatory change, but continues to influence the behavior and ideals of the regulatees (Hargrave and Van De Ven 2006). Despite the observation that institutional change can be a drawn-out process (Greenwood et al. 2014), few studies have taken a longitudinal stance and explored how actors engage in institutional work over time (Greenwood et al. 2011; Micelotta and Washington 2013; Smets et al. 2015). The aim of the current study is therefore to take a processual view (Langley et al. 2013) of regulatory change and develop new theoretical knowledge on the implementation process by asking: How does the institutional work of regulators and regulatees influence the implementation process of a new regulation? This research question is operationalized into three subquestions: (1) What mechanisms drive the implementation process forward?; (2) What types of institutional work are performed by regulators and regulatees in the implementation process?; and (3) How do regulators and regulatees navigate the institutional complexity caused by the implementation?

To study this, we draw on fieldwork and two longitudinal document studies of the public procurement of management consulting services in Sweden. Management consulting services are frequently used in the public sector (FEACO 2012). They build on intangible qualities such as creativity, trust, and people skills, and are governed by a professional logic (Armbrüster 2006; David, Sine, and Haveman 2013). Traditionally, clients have used relational purchasing practices and subjective evaluation criteria to hire consultants they know well and trust (Armbrüster 2006). In 1994, however, new legislation for public procurement—the Public Procurement Act (PPA)—was introduced in Sweden.[1] The PPA builds on transnational EU directives for public procurement,[2] and expresses ideals from bureaucratic and market logics (Meyer and Hammerschmid 2006). It prescribes that transactional purchasing practices and objective supplier selection criteria should be used, and that buyer–supplier relationships must not influence the purchasing process. We were intrigued by how regulators and contracting managers in public sector organizations responded to the regulatory change and how they sought to influence the implementation process.

Based on our analysis, we make three contributions. First, we identify two intertwined mechanisms driving the implementation process forward: *mobilization* and *cultivation*. Second, we develop a conceptual model illustrating how the implementation process unfolds through four waves: *initial impact, response, recovery,* and *stabilization*. Third, we provide a fine-grained understanding of how regulators and regulatees skillfully combine contradictory institutional logics to legitimize their preferred practices and resolve institutional complexity (Cloutier et al. 2016; Smets et al. 2015). Together, the results explain how regulators' and regulatees' institutional work influences to what extent a new regulation is implemented or adapted to the pre-existing institutional arrangements (Canning and O'Dwyer 2013).

A Processual View on Implementation

In recent decades, the implementation of policies and regulations has formed a central topic within public policy and administration research (Hupe and Hill 2016). Today, the literature is at a rather mature stage (O'Toole 2000). Reviews of the implementation literature show that extant research has largely tended to take either a top-down or a bottom-up approach (Hupe 2014; O'Toole 2000; Saetren 2014). Top-down approaches seek to identify factors enabling implementation, and explain implementation failures by actions taken upstream, such as poor communication, planning, or design (Hupe and Hill 2016; May and Winter 2009). Bottom-up approaches, on the other hand, highlight how the discretion of street-level bureaucrats can influence implementation (Hill 2003) and how their managers try to steer their actions through increased control, rules, incentives, or empowerment (Wenger and Wilkins 2009). Furthermore, it has been shown how the adoption or adaption of new policies and regulations varies depending on the tactics used by change agents in the recipient organizations (McDermott, Fitzgerald, and Buchanan 2013).

Recent research, however, points out that the tensions between top-down and bottom-up approaches are dissolving (Hupe and Hill 2016), and that implementations tend to be surrounded by conflict, resistance, and ambiguity, and influenced by many actors at multiple levels (Hupe 2011). Despite this, few studies take an integrative approach and explore how the interaction between policy makers (regulators) and public sector organizations (regulatees) influences the implementation process (Canning and O'Dwyer 2013; Cloutier et al. 2016; McDermott et al. 2015). Thus, the

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1   Swedish Public Procurement Act (2007:1091)

2   EU Directive no. 199/1994; EU Directive no. 24/2014

literature offers little guidance on how to understand or influence the dynamic process leading to the adoption or adaptation of regulations (Ansari et al. 2010; McDermott et al. 2013, 2015).

To capture this, a longitudinal and processual view on implementation is needed (Saetren 2014). As we are interested in how the actions of regulators and regulatees influence the implementation process (Hupe 2014), a framework built on the literatures on institutional change and institutional work is valuable (Cloutier et al. 2016). Recent research has argued that "attention to the interplay between conflicting institutional forces is especially important and interesting in organizational fields where government, regulators, professionals and service users coincide to deliver public services," and may help explain why and how public reforms are implemented or not (Ashworth et al. 2013, 7). So far, however, implementation studies drawing on institutional theory have tended to focus on macro-institutional effects (Pitts et al. 2010; Saetren 2014) or on very specific issues, such as how institutional knowledge influences contractual accountability (Girth 2014). Only recently have more current views of institutional theory, such as institutional work, been used to examine how implementation processes unfold (Ashworth et al. 2013; Cloutier et al. 2016). We position our study within this new, emerging line of studies.

Institutional Change

The institutional change literature studies how old institutional arrangements are replaced or altered into new ones. It has been described how an institutional shock, such as a regulatory change, can disturb the "socially constructed field-level consensus by introducing new ideas" and destabilize practices (Cloutier et al. 2016; Greenwood, Suddaby, and Hinings 2002, 60). These new ideas and practices are not neutral, but rather "loaded with normative theories (Ansari et al. 2010, 80). Previous research has argued that regulatees will have more freedom to adapt new practices to their local needs in the pre-institutional stage (compare Greenwood, Suddaby, and Hinings 2002), and that this freedom will be reduced over time as the level of institutionalization and pressures to conform increase (Tolbert and Zucker 1996). More recent research has sought to nuance this statement, arguing that early adopters may be "under closer scrutiny and adopt the new practice with little or no adaption," while late adopters will enjoy less stringent scrutiny and be able to adapt the practice to their local needs (Ansari et al. 2010, 81). The contradictory predictions in the literature indicate a need for more empirical, longitudinal research on how implementation of a new regulation and its associated practices unfolds. Against this background, we argue that unpacking the dynamic implementation process

following transnational regulatory changes is both theoretically and practically important for explaining how new regulations are adopted or adapted to local settings (Ansari et al. 2010; Canning and O'Dwyer 2013; McDermott et al. 2013).

In this article, we view the implementation of a new regulation as an ongoing process, characterized by flux and change, in which actors engage in institutional work to protect and promote their preferred institutional logics (Canning and O'Dwyer 2013; Greenwood et al. 2011; Lawrence, Suddaby, and Leca 2011). In this process, the power balance between logics may shift, resulting in effects that can be described as an outcome at a specific point of time, but that might be altered again as the process continues (Greenwood et al. 2011). Previous research has shown that the intensity of institutional complexity depends on the compatibility of logics and the composition of the field (Besharov and Smith 2014; Greenwood et al. 2011). It has been argued that institutional complexity is most acute in fields that are highly fragmented and moderately centralized (Pache and Santos 2010). Institutional complexity can then lead to conflicts between groups of actors as they try to deal with the conflicting institutional demands and develop strategies to defend their logic (Greenwood et al. 2011; Pache and Santos 2010). In doing so, they engage in institutional work.

Institutional Work

Institutional work is defined as "the purposive action of individuals and organizations aimed at creating, maintaining and disrupting institutions" (Lawrence and Suddaby 2006, 215). It concerns how individual and collective actors' actions affect institutions and induce or resist institutional change (Cloutier et al. 2016). Extant research has tended to focus on how elite actors such as top-level managers or powerful professional associations engage in strategic and purposeful actions (Micelotta and Washington 2013) or how factions inside organizations maintain, repair, and disrupt institutional arrangements (Jarzabkowski et al. 2009). This research has provided insights into what actions and counteractions actors take to promote their logics (Jarzabkowski et al. 2009). Even so, knowledge of how more ordinary actors with less formal power engage in institutional work is still very limited (Pahnke, Katila, and Eisenhardt 2015). This is somewhat surprising, given that this type of actor outnumbers the powerful elites, and constitutes the main body of actors inhabiting institutions (Shu and Lewin 2016). We therefore argue that it is highly important to include nonelite actors in the analysis.

Extant research has pointed out that institutional change can be negotiated, debated, and endorsed through discursive processes (Greenwood, Suddaby, and Hinings 2002; Lawrence, Leca, and Zilber 2013)

by actors such as regulators and media (Ansari et al. 2010). Change can be achieved by initiating dialogue with important actors in appropriate forums, and by tailoring the language to the specific actors involved (McDermott et al. 2013). In doing so, actors use institutional logics to legitimize ideas and practices (Cloutier and Langley 2013). Accordingly, we focus on these discursive aspects of institutional work.

Methodology

Research Setting

The public procurement of management consulting services in Sweden is used as the empirical setting for our study. It forms a particularly illuminating case (Eisenhardt and Graebner 2007), as Sweden is a small, homogenous country with a large public sector that frequently uses management consulting services. Swedish public organizations and policy makers are required by law to follow the "principle of openness" and to make their documents publically available. This principle enables wide research access (Yin 2009) and makes it possible to extract rich documentation regarding public procurement, policies, and policy implementation. It also makes it possible to trace not only one group of actors and their actions—that is, top-down approaches from regulators or bottom-up approaches from regulatees—but also to see how their actions are intertwined (Cloutier et al. 2016).

In institutional theory terms, this setting represents the intersection of two organizational fields: public procurement and management consulting. The Swedish public sector includes more than 5,000 public contracting agencies (regulatees) and spends approximately SEK 600 billion annually on goods and services, representing approximately 15%–20% of Sweden's GDP. Management consulting services represent annual spendings of approximately SEK 7 billion.[3] The field is strongly influenced by EU directives on public procurement and by the Swedish PPA. PPA was introduced in 1994 and regulates procedures, documentation, and principles in public procurement.[4] PPA is enforced by regulators, such as the Riksdag (Swedish Parliament), the Swedish Competition Agency, and courts of law. A supplier may bring a buyer organization to court if it perceives the purchasing process to be incorrectly performed. Should the court uphold the appeal, the buyer organization must pay a penalty and/or re-make the purchase.

From an institutional logics perspective, public procurement has traditionally been governed by a bureaucratic logic, emphasizing ideals of clear rules, documentation, objectivity, and anti-corruption (Meyer and Hammerschmid 2006). In the 1990s, the bureaucratic logic was complemented with the market logic, as New Public Management gained momentum (Meyer and Hammerschmid 2006). The market logic is characterized by market capitalism, growth by acquisition, and clearly defined markets and buyer–seller roles (Thornton, Jones, and Kury 2005). The two logics form the basis for the PPA. The field of management consultancy, on the contrary, is governed by a professional logic, emphasizing personal capitalism, personal reputation and networks, and organic growth (David, Sine, and Haveman 2013; Thornton et al. 2005). The public procurement of management consultancy is thus subject to the influence of three institutional logics, carrying different ideas on how purchases should be performed. Existing literature has described the bureaucratic and market logics as relatively compatible (Meyer and Hammerschmid 2006), whereas the professional logic and the market logic have been portrayed as conflicting and incompatible (Thornton et al. 2005). As the PPA is an elaborated and stringent version of the EU directives,[5] it forms an arena in which conflicting demands of the three logics become particularly visible (supplementary table 1).

Research Design and Data Collection

As this article seeks to understand how institutional work by regulators and regulatees influences the implementation of a new regulation, we performed a longitudinal single-case study (Saetren 2014). Single-case studies are well suited to capture complex processes over time and to identify key actors and events in the development (Benbasat, Goldstein, and Mead 1987; Eisenhardt and Graebner 2007). Ideally in case studies, different types of data and data from two or more sources are used to obtain a "rich set of data surrounding the specific research issue, as well as capturing the contextual complexity" (Benbasat et al. 1987, 374). We thus build on three sources of data: fieldwork, a document study of requests for proposals (RFPs), and a document study of media articles.

As a first step in our data collection, we conducted fieldwork (Uzzi and Lancaster 2004). We performed 20 interviews between 2003 and 2013 with representatives from professional associations, purchasing professionals and managers in public sector organizations, management consultants, and elected members of the Riksdag. All interviewees had long experience from public procurement as buyers, sellers, users, or policy makers, and were selected to provide a rich picture of

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3   *Kvalitetsmagasinet* (web-based trade journal), published March 15, 2012.

4   See the Swedish Competition Authority (www.kkv.se) for more information about the PPA.

5   PPA has been criticized for 'gold-plating' EU directives (see the Swedish government proposition 2013/14:133).

developments in the field. The interviews were initiated following increased media interest in 2001 and 2003 in the public purchasing of management consulting services. They were concluded within the same year as the collected RFPs and media articles, allowing the period of the interviews to cover the documentary data. We also observed two round-table meetings organized by the Riksdag in 2008 and 2009 and collected secondary data from regulators and regulatees. The data from the fieldwork was used to provide contextual information on how the field composition changed over time.

The fieldwork illustrated that the field was undergoing changes and that actors held widely divergent opinions about the PPA. To find out how and why the changes occurred, we performed two longitudinal document studies: a study of RFPs and a media study. We used a multilevel approach (Smets et al. 2012) by simultaneously studying individual actions, organizational actions, field level changes and the interaction between them. The starting point for the media and secondary data is 1994, the year in which the PPA was introduced. Because RFPs were not made publicly available until 2000, this year was chosen as the starting point for the analysis of the RFPs. In 2014, it was decided that major changes should be introduced in the PPA and implemented in 2017. We therefore use 2013 as ending point for the two studies.

A Longitudinal Study of RFPs

An important feature in public procurement is the RFP document. Since 2000, PPA prescribes that RFPs must be publicly announced and follow a strict format including: (1) a specification of demands; (2) commercial conditions in the contracts; and (3) administrative conditions for the suppliers. The PPA further states that the buyer should select the supplier who offers either the lowest price or the economically most advantageous bid.

The aim of the analysis of the RFPs was to explore how regulatees performed discursive institutional work to cope with conflicting institutional demands on how to hire consultants. This is highly relevant, as the discursive construction of the consulting projects and the consultants in the RFPs has a direct impact on which suppliers the regulators are allowed to hire, and hence what will actually be delivered. We studied RFPs for management consulting services published in the Swedish VismaOpic database (www.vismaopic.se) between 2000 and 2013. The VismaOpic database is Sweden's largest database for public procurement, and includes RFPs, contracting decisions, appeals, and court decisions published from 2000 and onwards. When searching the database, we used the search term "consult" to ensure that we captured consulting services that were relevant to the study but that were not explicitly labeled as management consultancy. The search yielded 899 hits, 590 of which were related to types of consulting services other than management consulting. Of the remaining 309 hits, 52 included links to no longer existing external websites and were therefore excluded from the analysis. This left a total of 257 relevant RFPs including full documentation (supplementary table 2). We also accessed federal appeals related to 14 of the studied RFPs and incorporated them into the analysis as secondary data.

A Longitudinal Media Study

The aim of the longitudinal media study was to capture how public procurement of management consulting services was described in Swedish media from 1994 to 2013. The media study provided important contextual information regarding developments surrounding the regulatees' writing of RFPs, and how various actors engaged discursively in institutional work throughout the implementation process. We collected data from the Swedish database Retriever,[6] which includes approximately 700 Swedish printed newspapers and journals and approximately 2,300 Swedish websites. We combined the search terms "consult" and "public procurement" to identify articles including both these concepts. Articles about types of consultants other than management consultants were excluded from the analysis. When the same event was described and published in multiple newspapers, we only included it once and incorporated the longest and most informative article about it in our analysis. Based on this review of the initial search, 262 articles were included in the final analysis. These were distributed over 8 national newspapers, 48 local newspapers, 30 trade journals, 5 press releases from private and public organizations, and 12 TV and radio channel websites. While the 262 selected articles were analyzed to see what institutional work was performed by regulators and regulatees in media, the remaining 1,457 articles from the media search were used as secondary data for contextual information (supplementary table 2 and supplementary appendix 1).

Data Analysis

In analyzing the data, we used an abductive and qualitative approach well suited for theory development (Gioia, Corley, and Hamilton 2013). We first analyzed our fieldwork and secondary data to obtain a contextual understanding of how the field had developed over time. We read and re-read transcripts from the interviews, notes from the observations, media articles, website information, reports, and documentation from regulators and regulatees to identify themes, actors,

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6 See http://www.retriever-info.com/sv/?redirect=true.

and events, and place them in time and space. This analysis enabled us to create a narrative of how the field changed over time (compare Gioia et al. 2013). This narrative is presented at the beginning of the description of each wave in the Findings section.

The data from the two document studies were analyzed in four iterative steps in which we continuously compared our data, categories, themes, and dimensions with theory (compare Gioia et al. 2013). To increase rigor, we first performed the analyses individually. We then discussed our results internally and with experienced colleagues to allow for alternative ideas and interpretations.

First, we created Excel spreadsheets summarizing the information in the RFPs and the media articles to provide an overview of the data. The information in the RFPs was categorized by year, type of purchasing procedure, type of assignment, evaluation criteria, evaluation method, and number of pages. The information in the media articles was categorized by year, type of article, and description of consultants, buyers, the PPA, and other actors such as purchasing consultants and legal experts.

Second, we coded the media articles and RFP documents, focusing on practices used by regulatees under the changed regulation. In the RFP study, we focused on evaluation methods and supplier selection criteria. Based on the coding of the data, a broad set of first-order categories, such as "the PPA locks out suppliers" or "gold-plating," was developed. The first two phases of the analysis identified patterns in how evaluation methods and selection criteria developed over time.

Third, we sought to answer the question of why these patterns had emerged. In doing so, we switched back and forth between theory and data, and analyzed the categories to identify second-order themes (Gioia et al. 2013). Having identified a number of second-order themes such as "collaborating" and "accepting subjectivity," we sorted them into aggregate dimensions to capture the institutional work performed by regulators and regulatees. Following recent research in institutional logics (Smets et al. 2015), we cross-coded the themes and their content against central building blocks of different sets of logics (Thornton et al. 2005). To see whether and how the patterns came together at a specific point in time, we first analyzed the identified themes synchronically and then diachronically to explore patterns over time (Cloutier et al. 2016; Smets et al. 2015). To describe how the implementation process evolved over time, we used the metaphor of waves. This metaphor illustrates how in each new wave, a set of practices and institutional work is brought forth, building on and carrying with it elements from the previous waves (Smets and Jarzabkowski 2013). Thus, the sets of practices and institutional work from the previous wave are not necessarily replaced by new ones, but can co-exist, although some are given prominence over others (Greenwood et al. 2011). Based on the data analysis, we identified four main waves with dominant institutional work practices: (1) *initial impact* (1994–1999), (2) *response* (2000–2004), (3) *recovery* (2005–2008), and (4) *stabilization* (2009–2013). The analysis also revealed how the bureaucratic logic, market logic, and professional logic were used in each of the different waves (supplementary table 3).

Fourth, once we reached theoretical saturation (Gioia et al. 2013) we developed data structures. We then used the data structures to theorize about the relationships between the identified themes and the aggregate dimensions (Gioia et al. 2013). Based on this aggregation, we developed two figures illustrating how the concepts from the analysis were connected (figures 1 and 2). The analytical process enabled us to identify how the institutional work performed by regulators and regulatees in media and the RFPs influenced the implementation process.

Findings

This section describes each of the four waves. For each wave, we start by drawing on our fieldwork and media data to describe the situation in the field and the field composition. We then describe the institutional work (marked in italics) identified in the two longitudinal document studies. The section concludes with a figure summarizing the findings.

Initial Impact: The Aftermath of an Institutional Shock (1994–1999)

The introduction of the PPA in 1994 can be described as an institutional shock, since the new regulation demanded well-established relational purchasing practices to be replaced by transactional purchasing practices. In the wave following this shock, the field of public procurement was highly fragmented. Managers tended to purchase management consulting services independently, and collaboration between the regulatees was sparse. The purchasing departments in the public organizations were mostly small functions with rather low status, and the knowledge about the PPA was centralized to legal experts and regulatory agencies. To make the regulatees adapt their purchasing behavior to the PPA, regulators engaged in institutional work of *standardizing*. Measures were taken to introduce unified and transactional purchasing practices, such as creating "Anbudsjournalen," a newspaper for publishing public procurement notices, and subscribing to the European TED database (Media: Dagens Industri, 16 March 1995). Newly established regulators such as the Swedish National Board

for Public Procurement [Nämnden för Offentlig Upphandling] should also oversee and provide information about public procurement to regulatees and suppliers "to facilitate compliance with the regulations" (Report: Effects of the PPA, Swedish National Board for Public Procurement, 1998, 14). However, despite the regulators' standardization efforts, the regulatees found it difficult to adjust to the new institutional requirements. The high levels of fragmentation and knowledge centralization in the field skewed the power balance in the regulators' favor.

Institutional Work in Media

The media study illustrated that the regulatees engaged in two different types of institutional work in response to the introduction of the PPA. One was to *orient* themselves in the new institutional landscape. They did this by searching for information, learning about the new purchasing procedures, asking central authorities for advice, and trying to translate the new institutional requirements into their purchasing practices. As described by the director of the City of Stockholm's internal consultancy: "We used to get questions [about how to perform public procurement] from managers rather seldom, but now they ask us for help every day" (Media: Dagens Nyheter, 6 April 1994).

Another type of institutional work was to *disregard* the regulatory change and continue using relational purchasing practices to hire management consultants. A deputy city officer elaborates: "We used our personal networks as a starting point and discussed who we could hire as an advisor, who would be loyal to the city administration and not to the market, that's how we came up with [name of consultant]." (Media: Göteborgs Posten, 26 November 1996). However, this practice was criticized in media. Journalists used arguments from the bureaucratic logic to accuse managers of not following procedures or being neutral in the supplier selection process. A national newspaper ran a series of articles on the theme "public procurement, consultants and the taxpayers' money." The first article in the series opened by stating that: "Every year the amateurish public procurement of consultants in the state and municipalities leads to the waste of billions of kronor; it is against the law, and cronyism is never far away" (Media: Göteborgs Posten, 22 May 1999). The media accused managers of "acting unprofessionally" and of using intuition and existing relationships with consultants rather than objective criteria to select consultants. It was claimed that managers had "decided which consultant to hire already before the purchasing process starts," thus turning the process into a "play to the gallery" (Media: Dagens IT, 18 March 1998). Similar arguments from the bureaucratic logic were used by legal experts and political scientists arguing for stricter

legislation and increased rights for suppliers to appeal contracting decisions (Media: Svenska Dagbladet, 12 January 1997). When defending their purchases, managers used arguments from the professional logic to highlight the uniqueness of the service and the importance of "getting the right consultant" for the project, for example, by claiming that: "We could not have chosen a different consultant—he [the hired consultant] already knew the issue very well." (Media: Göteborgs Posten, 22 May 1999).

Thus, the media articles from the first wave illustrate the fragmentation and knowledge centralization in the field. By reporting on managers not following the PPA when hiring management consultants, the media indirectly supported the regulators' standardization efforts (supplementary table 4).

Response: Navigating a New Institutional Landscape (2000–2004)

In the following wave, the field of public procurement was still highly fragmented. Due to the lack of inter-organizational collaboration and of a professionalized purchasing workforce, managers were left to deal with conflicting institutional demands over how to purchase management consulting services on their own. While the fragmentation did not support knowledge sharing between regulatees, the regulators, courts, and law firms continued to cooperate to develop their legal expertise in public procurement, making public procurement further centralized. In 2002, a new rule was introduced in the PPA, giving suppliers the right to appeal a contracting decision in the courts.[7] By imposing this rule, the regulators sought to *deter* the regulatees from maverick buying and to enforce compliance with the legislation. The regulatees now risked both lawsuits and negative media attention if they did not adhere to the legal requirements. The quote below illustrates how harsh the criticism in the media could be:

> The strongest criticism [from the government auditors] is directed at the Ministry of Economic Affairs for its purchases and the bonus of SEK 80 million paid to [consultancy]. The report mentions several flaws regarding compliance with the law, professionalism and business acumen. (Media: Helsingborgs Dagblad, 3 February 2001)

Institutional Work in Media

The media study illustrates that many regulatees still felt unsure about how to purchase correctly. The new rules meant that managers could no longer *disregard* the PPA. Instead, they tried to *hide* their relational

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7　Government proposal for changing PPA, February 21, 2002.
　　See also: http://www.offentligaaffarer.se/2011/01/10/sa-gar-en-oeverproevning-till/.

purchases. When caught, journalists used arguments from the bureaucratic logic to criticize the managers' purchases. New responses from regulatees to the criticism could however be identified. One was to make *excuses*; organizations claimed they did not know about the purchase and assured that it would not happen again, thereby passing the blame to the individual managers who had hired the consultants. This is illustrated in the quote below:

> I find it very serious that consultants have been hired without informing us, says councillor [name]. It feels like the social administration group [in the municipality] has gone behind our backs and hidden the purchases. (Media: Borås Tidning, 26 November 2000)

Another was to make *exceptions*; managers claimed that they had indeed followed the rules, but that the circumstances would allow for exceptions in the PPA; for example, they did not know in advance how large the project would be, or the knowledge they sought was unique to a specific supplier. However, these arguments were met with scepticism from the legal and auditing experts asked by journalists to comment on the purchases, as illustrated in the quote below:

> The CEO explained that the project was very urgent and that the hired consultant had unique competence. The PPA states that in such situations the threshold value of SEK 75,000 can be exceeded. But these arguments are not valid, say the municipality's auditors, who have hired the authorized auditing firm Öhrlings to investigate the matter. (Media: Borås Tidning, 16 October 2001)

A third response was to *counterattack*, dismissing the demands in the PPA as "absurd" and describe their own behavior as "acting in the taxpayers' interest." This is illustrated in the quote below:

> But councillor [name] does not think that the municipality has done anything wrong. "They hired a certain consultant simply because it was him they wanted. Should we have asked other suppliers to bid on his idea? That makes no sense to me," he says. (Media: Landstingsvärlden, 16 March 2000).

The managers also tried to *delegitimize* the PPA by contrasting the demands for elaborate purchasing processes with "how things are done in the real business world" (Media: Computer Sweden, 1 December 2004), thereby discursively constructing the public procurement as less real and business-like (Media: Svenska Dagbladet, 31 May 2001).

In this wave, the role of the media thus shifted from merely reporting on to openly criticizing public sector managers for not following the PPA. By doing so, the media contributed to regulators' efforts to deter managers from violating the PPA. Due to the fragmentation and knowledge centralization in the field, the public debate became rather imbalanced; while the regulatees could only draw on their individual knowledge to defend their purchases, the regulators and legal experts could draw on their shared knowledge to provide strong and legally based arguments for why the managers' defense did not hold.

Institutional Work in RFPs

For obvious reasons, it was not possible to see traces of *hiding* in the RFPs. Instead, the RFPs illustrated how regulatees strived to *conform* to the legal requirements. The language in the RFPs was in line with the bureaucratic logic; it had a neutral tone, used standard expressions, and asked about consultants' measurable skills (RFP: Uppsala County Council, 2003). The identified 35 RFPs from the second wave were short, measuring on average seven pages, and contained very brief descriptions of what qualifications the management consultants should have and how the bids were evaluated. Price and quality were used as selection criteria, but only quality dimensions that could be measured objectively, such as number of years of experience and formal degrees, were included. Two evaluation methods were used. In the first, found in 18 RFPs from this wave, parameters such as price and quality were given different weights; for example, "price 50% and quality 50%" (RFP: AMS, 2003). A total sum of weighted points was calculated and the supplier with the highest score was selected. However, no clear explanation was given of how each dimension would be operationalized and evaluated.

In the second evaluation method, found in 17 RFPs from this wave, the regulatees referred to the PPA and claimed that they would select the supplier that offered the economically most advantageous bid. How the bids would be evaluated was described in very general terms, for example, stating that the suppliers' "price, time, and quality" would be evaluated (see supplementary appendix 2 for an example). By *conforming*, the regulatees indirectly gave the RFPs a restricting role, as they let the legal requirements on how to write RFPs guide their purchasing behavior (supplementary table 5).

Recovery: Struggling to Win Institutional Ground (2005–2008)

In the third wave, the field of public procurement changed rapidly. Although it was still fragmented, regulatees increasingly sought collaborations and acted as groups rather than as separate entities.

This was done by initiating discussions about centralizing purchasing in public sector organizations (Media: Anbudsjournalen, 1 June 2007), establishing shared purchasing centers (Media: Anbudsjournalen, 14 December 2007), or creating forums in public sector organizations to discuss the PPA (Media: Upphandling24, 5 February 2008). Knowledge centralization decreased as professional associations and purchasing consultants began offering training in public procurement (Media: Anbudsjournalen, 26 October 2007; Upphandling24, 11 December 2007) and established new public procurement journals (such as Upphandling24), serving as arenas for discussion and sharing of best practices. The media also argued that the purchasing professionals should have more strategic roles (Media: Anbudsjournalen, 1 June 2007). The regulators responded by organizing round-table meetings to discuss the PPA. By engaging in *listening*, the regulators showed that they took the criticism of the PPA seriously and opened up for dialogue between different actors in the field.

Institutional Work in Media

In the third wave, media focus shifted from the importance of legal compliance to *questioning* the consequences of the PPA for both buyers and suppliers. As the levels of field fragmentation and knowledge centralization decreased, the regulatees' gained a stronger voice in the media and new arguments were developed to question the PPA. Whereas previously journalists had used arguments from the bureaucratic logic to criticize the regulatees, they now also used arguments from the market logic. Rather than criticize managers and agencies for not following legal procedures, journalists now stressed the consequences of it, such as reduced competition (Media: Sydsvenskan, 25 February 2007). Arguments from the professional logic were now also used by purchasing consultants, legal experts and journalists to criticize the PPA for the negative effects of not allowing subjective elements to be included in the supplier selection process, as illustrated in the quote below:

> "It's all about defining your demands correctly so you get what you want. But it can be difficult to define the demands when you don't know what you want. We could say that it [the PPA] is not optimal for buying consulting services. Using your intuition does not fit with the legal requirements," says [purchasing consultant]. (Media: Anbudsjournalen, 26 October 2007)

Interestingly, in this wave the regulatees also began using arguments from the bureaucratic logic to criticize the PPA. They argued that the stringent requirements in the PPA were too complex to support compliance (Media: Upphandling24, 5 February 2008), did not help reducing corruption (Media: Dagens Industri, 19 January 2006) and created confusion rather than clarity among buyers and suppliers because they could be interpreted in very differently (Media: Anbudsjournalen, 26 October 2007). The use of bureaucratic logic argument can be interpreted as a means for the regulatees to gain legitimacy by tailoring their language to the regulators and giving it a judicial tone. It can also be regarded as an expression of the increasing legal knowledge among the regulatees.

The regulators' decision to engage in *listening* can be regarded as a response to the increasingly tailored language among the regulatees. The observation that the bureaucratic logic could now be used by both proponents of and opponents to the PPA—thereby losing some of its argumentative power—also helps explain why regulators and journalists sought new arguments from the market logic to criticize violations of the PPA.

Institutional Work in RFPs

A trend toward using more complex quality dimensions and evaluation methods was identified in the 80 RFPs from this wave. The concept of quality was expanded to include specific expertise closely connected to the project, such as experiences from new companies (RFP: Härnösand municipality, 2005), or knowledge about the buyer's business environment (RFP: Blekinge municipality, 2008). The evaluation methods now included several steps of calculation, thereby making documents longer (on average 25 pages) than in the previous wave. Weighting and evaluation of economically advantageous bids were still used (in 56 and 10 of the 80 RFPs, respectively). A new method, monetizing, was found in 34 RFPs. It was based on the idea that quality could be translated into money or points, which were used to calculate a new price. The new price was then used to compare the different suppliers' offers and to choose the one with the lowest "new" price (see supplementary appendix 3 for an example).

Another new evaluation method found in eight RFPs was to include interviews and presentations as part of the supplier selection process (see supplementary appendix 4 for an example). To mitigate subjectivity and increase transparency, the RFPs stated which buyer representatives would be present and what questions would be asked (RFP: Försvarsmakten, 2005). Rich descriptions of how the interviews and presentations would be evaluated were included in the RFPs (RFP: Socialstyrelsen, 2006).

By disguising subjective and intangible qualities such as "the ability to connect" in bureaucratic logic language and by treating them as objective and

tangible aspects that could be measured quantitatively, the regulatees *smuggled* elements from the professional logic into the RFPs. The regulatees could also introduce statements expressing professional logic ideals in the RFPs, such as the consultant's ability to "immediately create trust" (RFP: Riksrevisionen, 2006). Unless the statements were appealed by suppliers or criticized in court, they indirectly became legitimized and accepted, and used in subsequent RFPs. By engaging in *smuggling*, the regulatees could thus change the RFP framework from within and make its boundaries more elastic (supplementary table 6).

Stabilization: Seeking to Balance Institutional Complexity (2009–2013)

In the fourth wave, new developments took place. Shared purchasing centers were established, and new arenas for networking and knowledge sharing were formed (Media: Webfinanser, 23 June 2011). At national level, the yearly conference Upphandlingsdagarna [Public Procurement Days] gathered politicians, purchasing professionals, CEOs, CFOs, and lawyers for discussions about the PPA (Media: Offentliga Affärer, 25 February 2010). At regional and local level, county councils and municipalities organized procurement councils consisting of actors from local public organizations and businesses; "collaborating to promote dialogue and develop public procurement" (Media: Västerbottenskuriren, 7 October 2013).

Purchasing professionals now increasingly became regarded as a professionalized workforce with higher status (Media: Upphandling24, 12 December 2013). The cultivation of a specific body of expertise was further increased by the growing number of courses, certifications, and awards in public procurement offered by professional associations such as the Swedish Association of Public Purchasers (SOI). Professional associations and regulators also offered guidelines on how to buy and sell management consulting services in the public sector (Media: Anbudsjournalen, 11 March 2011). The guidelines stressed that consulting services differed from other types of services and thus required specific purchasing approaches. Regulators offered similar guidelines to purchasing professionals in public organizations. These initiatives can be regarded as a means of legitimizing the characteristics of management consultancy and adapting the regulation to them, rather than the other way around. By engaging in public debates and drawing attention to the problems that regulatees and management consultants experienced with the legislation, professional associations, legal experts, and consultants hoped to influence politicians to introduce changes to the PPA (Media: Upphandling 24, 5 October 2010), as illustrated in the quote below:

"The PPA needs to be simplified and clearer. (…) Since so many purchases are appealed, the purchasing agencies tend to use lowest price to select suppliers, but that is unfortunate and does not stimulate doing good business," says [name], former head of legal affairs, Swedish National Board for Public Procurement. (Media: Anbudsjournalen, 23 November 2011)

The regulators responded to the small but vocal movement calling for changes in the legislation by taking initiatives to *adjust* it. In 2010, the Swedish government initiated a special investigation on how to improve the PPA (Dir. 2010, 86). The investigation resulted in a report called "Good deals: A strategy for sustainable public procurement" (SOU, 2013, 12). The regulators also organized debates and hearings to discuss the need to include more relational purchasing practices in the PPA, and presented proposals to adjust the regulations (Media: Offentliga Affärer, 25 February 2010).

In the fourth wave, the forming of shared purchasing centers increased collaboration between professional associations, consultants and legal experts, and their active engagement in public debates thus further reduced the levels of knowledge centralization and fragmentation in the field, and gave the new constellations of regulatees a stronger voice.

Institutional Work in the Media

These developments were mirrored in the media. A large proportion of the articles published in this wave still concerned managers violating the PPA when hiring management consultants. However, a new feature in this wave was that managers, consultants, professional associations, and legal experts increasingly used the market logic to criticize the PPA for inefficiency, for impeding rather than stimulating competition, and for creating unnecessarily high costs associated with purchases. The criticism took different forms, from acknowledging that "the idea of the law is good, but it is too complicated and easy to make mistakes, and large sums of money are at stake" (Media: Computer Sweden, 8 May 2012) to arguing for abolishing the PPA completely. The media landscape thus shifted in character toward becoming more focused on *challenging* regulation, as illustrated in the quote below:

Professor of law [name] wants to abolish the PPA, which she finds offensive to all purchasing professionals in the public sector. (…) "I am so mad at PPA; it leads to inefficiency and bad bureaucracy. I am also offended on behalf of Sweden's public procurers; the PPA presupposes that they are con men who cannot think independently." (Media: Realtid, 17 October 2011)

A growing number of articles also provided advice on how to succeed in purchasing management consultancy (Media: 22 October 2010). Success stories were told, highlighting the benefits of hiring consultants and illustrating cases where the purchasing process had worked well (Media: Dagens Nyheter, 23 December 2013). The need to adapt the PPA to the intangible qualities central to management consulting was also stressed in articles, both those criticizing the PPA and those presenting advice and best practice. It was argued that "it can be problematic to follow the PPA when buying management consulting services, as it is competence and not an easily defined good or service that is being purchased" (Media: Personal & Ledarskap, 27 January 2011). Furthermore, arguments were made for using subjective evaluation methods, such as interviews, claiming that using objective criteria alone, such as consultants' CVs, was not enough, as it "could lead to either a successful or a failed project" in which the "outcome would depend mostly on luck" (Media: Offentliga Affärer, 24 June 2013).

Thus, the focus of the media debate shifted from regulatees' breaking the law or criticizing the PPA to actively proposing solutions for how to adapt the regulation to the specificities of complex services like management consulting.

Institutional Work in RFPs

The development identified in the media articles was mirrored in the 142 RFPs from this wave. In these RFPs, new concepts and evaluation methods were overtly introduced. The concept of quality in the RFPs was expanded to include intangible qualities related to personality, professionalism, and the ability to build trust. This was achieved by stating that it would be "desirable" if the consultants had certain personal characteristics, such as: being independent, energetic, and able to deal with conflicts and resistance to organizational changes in a "mature" way; being humble with a proper amount of self-distance and self-criticism; or make employees feel involved in the project (RFP: Chalmers, 2010; FMV, 2013; Lidingö City, 2011). New methods were used to capture this expanded definition of quality, for example allowing consultants make a self-assessment and grading their "social competence, integrity, and fearlessness" on a scale from 1 to 10 (RFP: Business Region Gothenburg, 2009). A new dimension of the consultants' quality that stood out as a key criterion in the RFPs from 2008 onwards was their ability to form new relationships (RFP: Almi, 2008). As relationship-building is described as a core ingredient in the management consulting industry (Armbrüster 2006) and in the professional logic (Thornton et al. 2005), the explicit focus on the consultants' personalities and relational capabilities can be interpreted as a stronger presence and acceptance of the professional logic in the RFPs.

The regulatees also continued to include discussions about subjectivity in the RFPs (RFP: Royal Library, 2009), or openly state that they did not know exactly what tasks the assignment would include, thereby acknowledging the collaborative and open-ended nature of management consulting projects (RFP: Kristianstad municipality, 2013). This is illustrated in the following quote:

> It is inevitable that the evaluation to some extent will be subjective. Our purchasing group wants to assure bidders that its ambition is to perform the purchasing process as professionally as possible. (RFP: Royal Library, 2012).

In this wave, the evaluation methods were increasingly elaborated to include several steps and calculations as well as subjective qualities. In 25 of the 48 RFPs using weights in the fourth wave, the balance shifted so that more weight was given to quality than to price (see supplementary appendix 5 for an example). Moreover, the concept of quality was often operationalized into subcategories that were graded (see supplementary appendix 6 in the supplementary files).

New methods for evaluating quality were also developed, such as the use of *fictive cases*, found in eight RFPs. Tenderers who passed the qualification phase of the purchasing process were invited to present their solution to a fictive case provided by the buyer (RFP: Social Insurance Agency, 2012). The case resembled the type of project the consultants would work on if awarded the contract.

Another new evaluation method found in 10 of the studied RFPs was *fixed price*. In these cases, a fixed price was set and the tenderers were not allowed to offer any other (potentially lower) price, but were invited to compete on quality alone, for example, their competence, methodology, and experience (RFP: Bräcke Municipality, 2012; Region Halland, 2011; Karlstad Municipality, 2009). The fictive case and fixed price methods could be combined with other methods such as interviews (RFP: Business Region Gothenburg, 2009; 2012).

By overtly including arguments and ideas from the professional logic in the tender text, the regulatees thus used the RFPs to *normalize* it. Since RFPs and court decisions are publicly available, they acquired a role as knowledge repositories (Stigliani and Ravasi, 2012), meaning that other actors wishing to buy or sell management consulting services could learn from them the methods and criteria that were deemed legitimate. As a result, the RFPs became a vehicle for normalizing ideas from the professional logic and took on a life independent from the regulatees who had authored them (supplementary table 7).
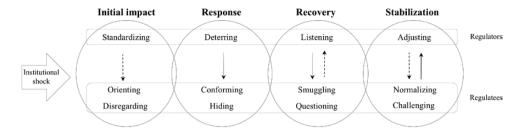
Figure 1. Overview Over the Identified Waves and the Institutional Work Performed in Them. The Institutional Shock Refers to the Regulatory Change. The Arrows Inside Each Wave Indicate the Direction of Influence between Regulators and Regulatees. A Dotted Arrow Indicates Weaker Influence and a Full Arrow Indicates Stronger Influence.

The Rise of a New Wave

In 2014, the Swedish government proposed changes in the PPA to the Riksdag, allowing for more relational purchasing practices. The changes are being crafted by regulators and legal experts, and will be implemented in 2017. This indicates that a new wave is on the rise, supporting increased stability and acceptance for purchasing practices associated with the professional logic. Figure 1 below summarizes the institutional work performed by regulators and regulatees in each of the identified waves.

Concluding Discussion

The current study set out to examine how regulators and regulatees try to influence the implementation process of a new regulation by engaging in institutional work. As transnational regulations play an increasingly important role in the globalized community and have strong influence on the day-to-day activities in public organizations, this is central to study (Djelic and Sahlin-Andersson, 2006). Previous research has suggested that regulatory changes can lead to unexpected outcomes and have far-reaching consequences for the regulated organizations (Cloutier et al. 2016; Greenwood, Suddaby, and Hinings 2002). A clear understanding of the implementation process leading up to these outcomes has however been lacking (Canning and O'Dwyer 2013). Our study adds to this research by studying both regulators and regulatees and exploring how the implementation process unfolds (Canning and O'Dwyer 2013; Cloutier et al. 2016; McDermott et al. 2015).

Based on our analysis, we make three contributions: first, we identify two mechanisms driving the implementation process forward: *mobilization* and *cultivation*. Second, we develop a conceptual model illustrating how the institutional work performed by regulators and regulatees influence how the implementation process unfolds. Third, we provide insights into how regulators and regulatees discursively combine contradictory institutional logics to resolve institutional complexity stemming from regulatory change.

Changing the Field Composition through Mobilization and Cultivation

We first contribute to existing research by offering an explanation of the observed temporal variation in the regulators' and regulatees' responses (compare Micelotta and Washington 2013). Based on our findings, we derive two intertwined mechanisms that underpin the transition from one wave to the next—mobilization and cultivation—and link the institutional work performed at a micro level to changes at the field level. *Mobilization* refers to initiatives from the involved actors to move from acting individually to establishing groups and acting collectively. This finding adds nuance to the dichotomy in previous implementation literature between powerful policy makers (Canning and O'Dwyer 2013) and managers and the presumably less powerful street-level bureaucrats (Hill 2003) by showing how the latter can mobilize into powerful groups (Pahnke et al. 2015; Shu and Lewin 2016). Our findings show that mobilization can take different forms, such as centralizing previously decentralized and local activities (e.g., creating purchasing centers), engaging interest groups like professional associations and organizing independent actors like researchers in shared activities (e.g., writing debate articles and arranging seminars). Importantly, it starts off as unorganized and dispersed initiatives on an individual level, develops into more visible but not necessarily formalized groups, and eventually into movements, visible in broad public debates, well-attended conferences and workshops, courses and training, etc. Thus, mobilization differs from organized attempts by professional associations and lobbying organizations to influence the implementation of regulations (compare Canning and O'Dwyer 2013; Micelotta and Washington 2013). Its informal character also makes it particularly difficult for policy makers and regulators to anticipate responses to a new regulation and foresee how the implementation process will play out. Yet by illustrating this and how mobilization occurs, we provide valuable insights into how "unexpected outcomes" can arise, and the dynamics behind them (Cloutier et al. 2016; Greenwood, Suddaby, and Hinings 2002).

The findings also show how increased mobilization enables *cultivation* to take place. Cultivation in this context has two interrelated meanings, referring both to the development of new knowledge and to an increased sophistication of professional manners. While knowledge of the PPA was mainly held individually by regulatees in the first two waves, it became increasingly shared in the third and fourth waves as purchasing centers were established and courses, certifications, conferences, and hearings were organized. This development allowed the regulatees to share knowledge and experiences, and to build expertise about the PPA, thus reducing knowledge centralization in the field. It also helped them cultivate a set of professional manners, practices and tools to use in procurement processes. Cultivation thus enabled regulatees to transform from individual managers and purchasing professionals scattered across local public sector organizations into a visible body of professionals with a specific knowledge domain and status. In a recursive manner, the increased cultivation enabled higher levels of mobilization, as it became easier for regulatees to associate themselves with a particular group.

Together, the reduced levels of fragmentation and knowledge centralization made the power balance in the field less skewed (Pache and Santos 2010) and enabled new types of institutional work to be performed. Previous research has suggested that power distribution is a decisive factor for institutional stability (Hargrave and Van de Ven 2006) and that fields dominated by a powerful actor will be more stable and experience less institutional complexity (van Gestel and Hillebrand 2011). Our findings indicate that on the surface, the field of public procurement was dominated by powerful regulators holding strong legislative and coercive power, and was governed by two co-existing institutional logics (compare Reay and Hinings 2009). Beneath the surface, however, the field was characterized by contestation and flux, inhabited by actors seeking to maintain practices associated with the professional logic despite institutional pressure from the market and bureaucratic logics in the PPA. This observation strengthens the argument that when planning implementation, regulators cannot rely too heavily on their formal power and position in the field (McDermott et al. 2015). Rather, they need to be observant of the actions of street-level bureaucrats who, by engaging in mobilization and cultivation, and turning their individual institutional work into collective institutional work, can change the field composition and, ultimately, the regulation itself.

A Conceptual Model

Previous conceptual research has argued that in early stages of the implementation process a new regulation and its associated practices will be implemented with few adaptations. Over time, however, due to contestation and waning scrutiny, new versions of the practices emerge that fit better with regulatees' needs and interests (Ansari et al. 2010). We provide empirical support for this proposition and offer an explanation for how this development takes place. In particular, we develop a conceptual model illustrating how the institutional work performed by regulators and regulatees influences the unfolding of the implementation process (Cloutier et al. 2016; Saetren 2014). The model illustrates how implementation is a dynamic multi-level process consisting of ongoing actions and counteractions between regulators and regulatees (Canning and O'Dwyer 2013; Greenwood, Suddaby, and Hinings 2002). It shows how the implementation process moves through four different waves, *initial impact*, *response*, *recovery*, and *stabilization*, each bringing forth new types of institutional work. The process is sequential, meaning that the types of institutional work build upon and relate to each other.

Inside each wave is the top-down institutional work performed by regulators and the bottom-up institutional work performed by regulatees. The thin arrows inside the circle indicate the direction and strength of the actors' influence on each other. A dotted arrow indicates weaker influence and a full arrow stronger influence. The influence can take different forms; from issuing new rules and forming new organizations to engaging in public debates. In this particular case, the public debate shifted over time and became more multifaceted: from mainly reporting on and criticizing managers violating the PPA in the first two waves to introducing new arguments aimed at criticizing and changing the PPA in the third and fourth waves. By skillfully introducing new arguments in the debate and forming a more visible group of actors, the regulatees managed to change the public debate from supporting the regulators' efforts to increase compliance to also supporting the regulatees' struggle to adapt the PPA to their needs.

As illustrated in the model, the direction and strength of the influence changes over time according to the institutional work performed; from regulators mainly influencing regulatees to regulatees also influencing the regulators and the regulation. The thick arrows below the waves illustrate how the underlying mechanisms, mobilization and cultivation, drive the process forward and change the field composition. As mobilization is an enabler of cultivation, this arrow is positioned at the bottom of the figure to illustrate its fundamental role in the process. The thin arrows illustrate how increased mobilization reduces field fragmentation, whereas increased cultivation reduces knowledge centralization. By reducing field fragmentation and knowledge
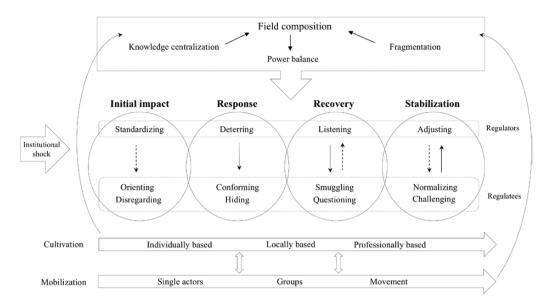
Figure 2. Conceptual Model Over the Implementation Process

centralization, the power balance in the field becomes less skewed. This in turn allows for new types of institutional work to be performed.

The model thus shows how the identified types of institutional work interact with each other (compare Clemens and Douglas 2005). This implies that although the imposition of a new transnational regulation can be characterized as top-down-driven institutional change (Hupe and Hill 2016; May and Winter 2009), the responses to the new regulation can be viewed as bottom-up-driven institutional change in which actors seek to adjust the regulation to their local setting (Ansari et al. 2010; Hill 2003; McDermott et al. 2013). We thus argue that implementing new regulations is not necessarily a unidirectional process, as previous studies at discrete points of time have suggested, but rather a bidirectional process of actions and counter-actions that move forward until a resolution is reached (compare Canning and O'Dwyer 2013; Greenwood et al. 2014; McDermott et al. 2015).

Combining Contradictory Institutional Logics

Finally, we contribute by providing detailed insights into how regulators and regulatees discursively combine contradictory institutional logics in their institutional work to resolve institutional complexity stemming from regulatory change (Ansari et al. 2010; Greenwood, Suddaby, and Hinings 2002; Lawrence et al. 2013; McDermott et al. 2013). Extant research has pointed out that institutional change, such as regulatory changes, can be negotiated through discursive processes (compare Ansari et al. 2010; McDermott et al. 2013), but a detailed understanding of how this is achieved in institutional work is lacking (Greenwood,

Suddaby, and Hinings 2002; Lawrence et al. 2013). We contribute by showing how regulators and regulatees discursively used elements from institutional logics to legitimize their preferred purchasing approaches (compare Cloutier and Langley 2013). In the first two waves, regulators, legal experts, and journalists used the bureaucratic and market logics to criticize relational purchases. In the last two waves, however, the role of bureaucratic logic changed from being coercive and normative into a legitimization tool that could be used by the opposing parties to legitimize their preferred purchasing practices (Cloutier and Langley 2013). The market logic was still used to criticize relational purchases in the third wave, but in the fourth wave professional associations, legal experts and journalists also used it to criticize the PPA. They questioned to what extent the PPA contributed to creating efficient and noncorrupt markets, and argued that it actually led to increased costs, inefficiency and corruption. They thereby turned the market logic against itself. The findings thus show how actors can legitimize their preferred practices (Smets et al. 2015) by combining seemingly contradictory and incompatible logics (Besharov and Smith 2014). The professional logic was used throughout the studied period to legitimize relational purchases. This highlights the agency of both regulators and regulatees and shows how they can use institutional logics in institutional work to create, maintain and disrupt new regulations (compare Cloutier and Langley 2013; Lawrence et al. 2011).

The findings illustrate how the role of the RFPs changed over time as the regulatees became more skilful in using them. While the RFPs had been designed to

enforce compliance with the bureaucratic and market logic ideals in the PPA, they were transformed by the regulatees into vehicles for legitimizing ideals from the professional logic. In a similar vein, the regulatees went from fearing lawsuits in the second wave to increasingly using appeals and court decisions in the third and fourth waves to test new purchasing practices. If regulatees won in court, the new practice became legitimized. Since both court decisions and RFPs are publicly available, elements from the professional logic that had been successfully incorporated into them became part of a commonly held repertoire of legitimate evaluation practices, thereby influencing future purchases. The court decisions and the RFPs thus acquired a role as independent knowledge repositories (Stigliani and Ravasi 2012), disseminating ideals from the professional logic to a wider audience. Based on these findings, we argue that to fully understand how the implementation of new regulations play out over time, more attention should be given to how objects are treated as manifestations of logics and how they can influence and be influenced by actors' institutional work (Lawrence et al. 2011).

Practical Implications

The findings have practical implications for both regulators and regulatees because they help explain, anticipate, and meet reactions to transnational regulatory changes. They show how regulatees, by engaging in mobilization and cultivation, can change the power balance in the field and turn themselves into a visible counterpart that regulators need to consult in the implementation process. The findings call for greater sensitivity among regulators to the actions of seemingly ordinary and nonelite actors in their field. Regulators wishing to impose a top-down regulatory change are well advised to seek support from or co-opt groups of regulatees, such as professional associations, to stall mobilization and anchor the changes with them. The findings also provide detailed insights into how the implementation process unfolds over time. Although the process is sequential, it can be speeded up by shortening the time spent in each wave. This can be achieved either by ensuring that no mobilization and cultivation occurs and imposing a top-down-driven change or by accelerating the mobilization and cultivation processes. By quickly forming a visible counterpart to the regulators and new regulation, non-elite regulatees can engage in collective institutional work to instil bottom-up-driven institutional change and adjust new regulation. Moreover, the findings suggest that to win acceptance for either the new regulation or the previous institutional arrangement, it is more powerful to use arguments from opposing logics than to remain only within the

discursive sphere of the preferred logic. They also illustrate that the role of objects can change as they become used by different actors to adopt or adapt the new regulation.

Limitations and Implications for Future Research

The current study has limitations that we hope will inspire future research. The study was performed in a specific context—the public procurement of management consulting services in Sweden—and for a specific period, which could be considered particularly well suited to studying implementation. We also argue that our findings could be generalized to other countries with similar regulations, and to types of knowledge-intensive and complex services other than management consulting services. However, to test the generalizability of the findings, more empirical research is needed. We suggest that studies be performed in countries with different regulatory systems and on other types of purchases. It would also be interesting to explore whether the implementation process differs between policy and program implementations. Related to this is the question of whether it would be possible to skip any of the waves in the implementation process, depending on (1) the context and (2) what is being implemented (e.g., program or policy).[8]

Since much of the existing research on implementation has been performed at separate levels—that is, the field, organization or micro level—less is known about how these levels interact (Hupe 2014). Our study attempts to bridge this gap, but more multi-level studies are needed. In such studies, a particular interest in the interstices between institutional complexity and institutional work is warranted (Lawrence et al. 2011; Smets and Jarzabkowski 2013) as institutional change—such as the adoption or adaption of a new regulation—is achieved by people's individual and collective actions (Greenwood, Suddaby, and Hinings 2002; Micelotta and Washington 2013). The findings also indicate that more attention should be given to the role of discourse and objects in implementation.

Supplementary Material

Supplementary data are available at *Journal of Public Administration Research and Theory* online.

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