

When do bureaucrats respond to external demands? A theoretical framework and empirical test of bureaucratic responsiveness

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Abstract

Bureaucrats must balance neutral competence with responsiveness to external demands. As external demands are simultaneous and multidimensional, this study analyses bureaucratic responsiveness according to bureaucratic actors' prioritization decisions. Using a discrete choice experiment followed by qualitative interviews in the context of EU agencies, we investigate to what extent bureaucratic responsiveness depends upon the stakeholder that expresses an external demand (source), the aspect of bureaucratic conduct that is addressed (content), and the presence of adverse media attention (salience). In addition to corroborating prior empirical findings, we provide a novel understanding of bureaucratic responsiveness by showing the way the demands' source and content affect responsiveness jointly. Across the range of technical, performative, legal-procedural, and moral demands, we identify which stakeholders can impose demands most authoritatively. We also extend previous research by demonstrating that adverse media attention strengthens responsiveness to technical and moral demands, but not to performative and legal-procedural demands.

Keywords: Bureaucratic responsiveness; Reputation; Mixed-methods design

Evidence for Practice

- As government agencies face simultaneous and heterogeneous external demands to explain, justify, or clarify organizational conduct, in practice, bureaucratic responsiveness requires prioritizing external stakeholders' demands.
- All else equal, this discrete choice experiment finds that top-level bureaucrats working at EU agencies are most responsive to political principals' demands and those with adverse media salience.
- Certain stakeholders can advance more authoritative claims about specific areas of organizational conduct than others: Bureaucrats prioritize technical and performative demands more strongly when expressed by their political principals.
- Relative to demands about moral (mis)conduct by political principals, the general public's moral demands evoke higher bureaucratic responsiveness.
- Adverse media salience strengthens bureaucratic responsiveness to demands of a technical and moral nature.

Introduction

The bureaucracy's emphasis on neutral competence and professional expertise is a cornerstone of democratic processes' functioning (Weber 1947; Rourke 1992). However, bureaucrats operate in complex and vibrant environments that consist of numerous stakeholders with heterogenous and potentially conflicting interests. These stakeholders not only observe bureaucratic conduct, but express demands actively that, if not addressed properly, may have grave consequences for the bureaucracy's ability to perform its unique role adequately and maintain its bureaucratic reputation (Aleksovska, Schillemans, and Grimmelhuijsen 2022; Besselink and Yesilkagit 2021; Gilad, Maor, and Bloom 2015; Koop and Lodge 2020; Maor, Gilad, and Bloom 2013; Rimkutė 2020b; Salomonsen, Boye, and Boon 2021). As such, it is vital for bureaucrats to balance the adherence to neutral bureaucratic competence with responsiveness to external demands (Saltzstein 1992; Bryer 2007). As these external demands are multiple and multidimensional, the study of bureaucratic responsiveness entails analyzing bureaucratic decision-makers' prioritization decisions.

The challenge in addressing external demands adequately is acknowledged widely in the literature. However, research on bureaucratic responsiveness has begun to explore the multiplicity and multidimensionality of demands on bureaucratic prioritization decisions only recently (see, for example, Maor, Gilad, and Bloom 2013; Gilad, Maor, and Bloom 2015): Bureaucrats must prioritize between simultaneous demands that vary not only according to the source (which stakeholder is making the demand?), but also to their content (which aspects of bureaucratic conduct are criticized?), as well as the salience of demands that are made (does the demand receive adverse media attention?). To that end, our research question is: How do external demands' source, content, and salience influence bureaucrats' prioritization decisions?

This study makes a novel contribution to the scholarship on bureaucratic responsiveness, which is defined as “... the ways in which public agencies balance the needs and demands of stakeholders” (Bryer 2007, 481), by examining the way bureaucrats prioritize external stakeholder requests. The study adds to our understanding of bureaucratic responsiveness that has long been of interest to public administration scholarship, which emphasizes external demands’ influence on bureaucrats’ behavior (e.g., Gilad, Maor, and Bloom 2015; Koop and Lodge 2020; Maor, Gilad, and Bloom 2013; Miller 2000; Lowande 2019; Rourke 1992; Besselink and Yesilkagit 2021; Fernández-i-Marín et al. 2023).

Previous theoretical work has introduced core theoretical models of bureaucratic responsiveness; however, scholars have called for a more differentiated understanding of the concept: “... [t]he utility of research on such theoretically significant questions can only be enhanced by increased awareness of the full range of models of bureaucratic democracy and by renewed attention to the conceptual subtleties of responsiveness” (Saltzstein 1992, 84; cf. Bryer 2007). Prior empirical studies have addressed the relevance of heterogeneous stakeholders, the content of public allegations, and media salience to bureaucratic responsiveness (e.g., Aleksovskaja, Schillemans, and Grimmelikhuijsen 2022; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Rimkutė 2020b; Salomonsen, Boye, and Boon 2021).

This study advances an integrated understanding of bureaucratic responsiveness further by examining the interactions between external demands’ source, content, and salience. We make a theoretical contribution by theorizing and analyzing how responsiveness to the content of external demands (i.e., concerns about technical, performative, legal-procedural, or moral bureaucratic conduct) is moderated by demands’ source and salience. We theorize how stakeholders’ ability to bring reputational losses are used by bureaucrats to evaluate the relative strengths of reputational

threats and, in turn, prioritize the most threatening external demands for an immediate response. Moreover, we theorize and test how bureaucratic responsiveness to content of external demands is moderated by the presence of adverse media attention.

As such, this study offers a more nuanced theoretical and empirical understanding of the way that bureaucrats prioritize between multiple and multidimensional demands to achieve bureaucratic responsiveness to a wide range of stakeholders and the quest to engender their unique role in democratic political systems. In so doing, we complement long-established theoretical approaches to explain bureaucratic responsiveness (e.g., political control) with a relatively new theoretical account, i.e., bureaucratic reputation theory, and argue that upholding a positive reputation of unique bureaucratic traits is of utmost importance for organizational success, autonomy, and legitimacy (Bertelli and Busuioc 2021; Busuioc and Rimkutė 2020; Carpenter 2010; Carpenter and Krause 2012; Maor 2015; Rimkutė 2020a).

This study makes a methodological contribution by examining the research question through a mixed-methods design that combines experimental and qualitative evidence. We use a pre-registered discrete choice experiment and follow-up interviews with top-level bureaucrats working at EU-level independent agencies. Our experimental design allows us to validly distill the separate effects of source, content, and salience as well as their interactions on bureaucrats' prioritization decisions from unobservable confounders, whereas the analysis of prioritization decisions of actual bureaucrats strengthens the external validity of our study. Subsequent qualitative analysis of interview data further informs the theoretical mechanisms by uncovering the considerations and justifications of bureaucrats' prioritization decisions.

Our analysis indicates that EU-level agency bureaucrats are most responsive to demands their political principals (the European Commission and the European Parliament) express and

demands with high media salience. Our findings expand existing evidence by showing the way different stakeholders can make more authoritative claims about specific aspects of bureaucratic conduct: Demands of a technical and performative nature are responded to most when articulated by political principals, and moral demands evoke higher responsiveness when voiced by the general public as compared to political principals. Further, we conclude that adverse media salience in particular prompts bureaucratic responsiveness to demands related to technical and moral bureaucratic conduct. In line with extant empirical evidence, our findings suggest that top-level bureaucrats engage in cautious considerations of concurrent multifaceted demands to strategically prioritize the most urgent requests to actively avert conceivable reputational threats (cf. Gilad, Maor, and Bloom 2015).

Theoretical framework: When do bureaucrats respond to external demands?

Our theoretical framework emphasizes the way that external demands' multidimensional nature (i.e., demands with varying source, content, and salience) affect bureaucrats' prioritization decisions. We specify theoretical expectations for the aspects separately, and the way that source and salience moderate bureaucratic responsiveness to demands with different content.

Bureaucratic responsiveness to stakeholders that represent the public's wishes

The initial bureaucratic responsiveness model posits that the bureaucracy's role in democratic political systems is to respond to the public's needs and regards the bureaucracy as a representative of the public and their wishes (Saltzstein 1992). However, different strands of literature have proposed diverse routes through which the public's wishes feed into bureaucratic deliberations. First, the dominant approach to bureaucratic responsiveness—the political control

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literature—considers elected officials the only legitimate representatives of the public’s interests (e.g., Wood and Waterman 1991). The bureaucracy serves as an impartial broker, the services of which elected officials may use to meet public demands. In light of this view, democratically elected representatives have the exclusive duty to represent public interests. The bureaucracy does not attend to the public’s wishes directly or independently. Rather, it responds to public interests only through the “... faithful adherence to elected officials’ interpretation of public wishes” (Saltzstein 1992, 65). Accordingly, the literature indicates that political principals—democratically elected officials and/or other professional overseers—dictate bureaucratic responsiveness (Bryer 2007). Following the Principal-Agent model, bureaucracies are created and designed to be solely receptive to their political superiors (for further elaborations see, McCubbins 1985). Although independent agencies are by design placed at arm’s-length from politics, bureaucrats in these agencies, too, must in practice navigate political value trade-offs, generally resulting in high degrees of responsiveness to political principals (de Boer 2023; de Kruijf and van Thiel 2018; Eriksen 2021). Accordingly, we expect:

Hypothesis 1: When faced with multiple external demands, bureaucrats will prioritize those that originate from political principals.

Second, public administration scholarship focusing on explaining the behavior, processes, and outputs of independent government agencies suggests an alternative explanation of the way bureaucrats attend to the public’s wishes. It argues that the bureaucracy may aim to attend to the public’s wishes directly without any intermediaries (i.e., political principals) to address their democratic legitimacy deficit by demonstrating their attentiveness to prevalent concerns of citizens (Alon-Barkat and Gilad 2016). Majone, for example, noted: “[d]emocratically accountable

principals can transfer policy-making powers to non-majoritarian institutions, but they cannot transfer their own legitimacy” (1999, 7). As the legitimacy of bureaucratic institutions does not ensue from the mere fact that authority has been formally granted (Rimkutė and Mazepus 2023), bureaucrats may attempt to fill an authority-legitimacy gap by prioritizing the wishes of the general public¹ (i.e., ordinary citizens) over other stakeholders’ demands. For instance, Moschella, Pinto, and Martocchia Diodati (2020) have illustrated how the European Central Bank strategically addressed negative public allegations by enhancing its public communications, aiming to confront democratic legitimacy concerns arising from the general public (i.e., EU citizens). Accordingly, we hypothesize:

Hypothesis 2: When facing multiple external demands, bureaucrats will prioritize those that originate from the general public.

Bureaucratic responsiveness to reputational threats

A common element of several theoretical frameworks in public administration is that bureaucrats must balance between competing demands, preferences, and values (e.g., Bozeman 2007; Hood 1991). Bureaucratic reputation theory emphasizes strategic considerations to suggest that bureaucrats are more receptive to external demands when their content threatens their organization’s reputational uniqueness (Carpenter 2010; Carpenter and Krause 2012). Attention thus shifts from representing political principals’ or the general public’s preferences directly to a ‘Weberian’ emphasis on rational character and autonomous professional norms as a guide for bureaucratic behavior (Weber 1947; Wilson 1989; Rourke 1992). Bureaucratic professionalism, technical standards, rules, and norms serve as internal guides for bureaucratic behavior and determine bureaucratic responsiveness decisions (Miller and Whitford 2016). Therefore,

bureaucratic responsiveness to external demands is led by rationality and zeal to preserve a positive reputation of bureaucrats' distinctive character and roles in a political system (Carpenter 2010).

Reconciling multifaceted aspects of bureaucratic responsibilities and obtaining a positive corresponding reputation is a meticulous balancing act (Carpenter 2010; Carpenter and Krause 2012). Bureaucrats must decide which of the following professional responsibilities receive priority in view of multiple simultaneous demands: Providing sound professional outputs (corresponding to technical reputation), delivering effective outputs efficiently (performative reputation), adhering diligently to legal procedures (legal-procedural reputation), or committing to positive outcomes of their bureaucratic conduct that include moral and ethical considerations of bureaucratic activities (moral reputation) (Carpenter and Krause 2012).

Although the multidimensional nature of bureaucratic conduct is well-acknowledged in the public administration literature, diverse literature streams provide competing explanations in terms of which of the bureaucratic conduct dimensions (technical, performative, legal-procedural, or moral) bureaucrats choose to prioritize when faced with multiple and simultaneous external demands (see, for example, Krause and Corder 2007; Majone 1997; Miller 2000; Miller and Whitford 2016; Rourke 1992). We emphasize that a myriad of mechanisms may drive responsiveness to the content of external demands, including coercion to comply with laws, regulations and court rulings, resource availability, agency mission statements, bureaucrats' personal motivations and values, and prior exposure to demand content. Nonetheless, bureaucratic reputation scholarship has demonstrated consistently that public salience encourages government agencies to engage in strategic reputation management activities by diversifying their response to public allegations (Maor, Gilad, and Bloom 2013). In addition, responsiveness may increase to demands exercised by authoritative stakeholders who are able to impose grave reputational losses

(Gilad, Maor, and Bloom 2015; Krause and Corder 2007). We therefore formulate hypotheses about all four bureaucratic conduct dimensions (see Online Appendix V) and proceed here with specifying our expectations on the interaction effects between the content and salience as well as the content and source of external demands on bureaucrats' prioritization decisions.

Bureaucratic responsiveness to publicly salient matters. The extent of public salience, i.e., negative media coverage of an external demand, has been argued to affect a bureaucrat's choice to prioritize a particular external demand when providing a response (Erlich et al. 2021; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Salomonsen, Boye, and Boon 2021). Heightened media attention has been found to influence bureaucratic behavior in general and responsiveness in particular, i.e., greater media coverage of organizational misconduct and failure leads to increased responsiveness (Erlich et al. 2021).

Scholarship on regulatory agencies' responsiveness to grave public allegations has argued that agencies that receive extensive adverse media attention are more likely to engage in regulatory talk rather than remain silent to minimize the reputational damage attributable to a specific public accusation (Bach et al. 2022; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Rimkutė 2020b). Further, studies on media coverage patterns over time have demonstrated that adverse media attention is more likely to attract additional critical coverage in the future: "... [w]hile some negative coverage might merely appear to present 'minor' criticism, it might nevertheless represent 'a small seed' for future negative coverage and be stored on top of the other negative stories in the minds of the (media) audience, strengthening a negative causal antecedent when judging future behavior" (Salomonsen, Boye, and Boon 2021, 517). As a result, we expect that adverse media attention is likely to motivate bureaucrats to be more responsive. The theoretical mechanism underlying this claim originates from the bureaucratic reputation

scholarship. Adverse media attention is seen as an urgent threat to an organization's reputation vis-à-vis multiple audiences and, therefore, is more likely to elicit individual bureaucrats' response to mitigate damage to their bureaucratic reputation by refuting public allegations, shifting the blame, or buffering coercive interventions and pressures to align their outputs, processes, or behavior to external demands (Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Rimkutė 2020b). We regard media not as an independent stakeholder who exercises demands on its own, but rather as a critical conduit between bureaucracies and their multiple audiences as well as an important channel through which diverse audiences learn about various aspects of bureaucracy's conduct and acquire reputational perceptions about the bureaucracy at hand. As noted by Maor, "as an indispensable part of modern democratic life, the mass media plays a key role in channeling, and sometimes even structuring, interactions between agencies and audiences" (2020, 2). For example, the media is argued to perform as a channel between bureaucracies and the public. (Soroka et al. 2012), bureaucracies and political stakeholders (Pérez-Durán 2017), as well as bureaucracies and broader audiences that extend beyond political principals and individual citizens (Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013). Accordingly, we hypothesize:

Hypothesis 3: When facing multiple external demands, bureaucrats will prioritize those that have received extensive adverse media coverage.

Further, as argued above, bureaucrats have been found to be sensitive to allegations that target their bureaucratic competencies (Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Müller and Braun 2021; Rimkutė 2020b; van der Veer 2021; Varela Castro, Bustos, and Saldivia Gonzatti 2023). For example, Müller and Braun (2021) demonstrated empirically that in

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view of intensified media attention, regulatory agencies tend to engage in reactive communication strategies to respond to demands their audiences have raised. In particular, agencies were found to engage in reactive response strategies to public allegations when they targeted regulatory agencies' core competencies as well as those competencies for which their reputation is still developing (Maor, Gilad, and Bloom 2013; Müller and Braun 2021). For example, in view of critical public allegations, the European Food Safety Authority (EFSA) was found to engage in extensive regulatory talk to refute accusations that targeted its core competencies and organizational functions that are at the heart of its distinctive role in the political system in which it operates (Rimkutė 2020b). The study demonstrated that bureaucrats are particularly sensitive to public accusations that target their distinctive bureaucratic competence (i.e., technical and legal conduct). For example, to defend its unique role, the EFSA was found to defend its distinctive missions, roles, and tasks vigorously by engaging "... in a significant effort to clarify, justify, and, in turn, legitimize their scientific conclusions and processes" (Rimkutė 2020b, 1652). Thus, consistent with this literature, we expect that bureaucrats will display heightened responsiveness when confronted with adverse media scrutiny directed at their fundamental bureaucratic competence, encompassing professional standards and rules (Bryer 2007). This pertains specifically to their technical and legal-procedural conduct:

Hypothesis 4a, b: Bureaucratic responsiveness to demands related to core bureaucratic competence, (a) technical and (b) legal-procedural conduct, increases when those demands have received extensive adverse media coverage.

Bureaucratic responsiveness to demand content that targets reputational uniqueness. We further argue that bureaucratic institutions hold a diverse set of reputational vulnerabilities vis-à-

vis multiple stakeholders when it comes to the content of the demands that these diverse stakeholders may exercise. We expect that bureaucrats' responses to simultaneous external demands reflect the strength of the threat that a particular stakeholder (or audience) can pose to their technical, legal-procedural, performative, or moral reputations and, in turn, question their legitimacy in a polity. This is the case because some stakeholders can voice more authoritative demands about specific aspects of bureaucratic conduct that, if not immediately attended to, may inflict reputational damage not only in the eyes of stakeholders that exercise those demands but also across multiple audiences. Specifically, we expect that in contexts in which highly heterogeneous audiences exercise external demands, we should observe bureaucrats' greater sensitivity to (1) political principals when their demands are related to bureaucratic competence and professional goals (i.e., technical, legal-procedural, and performative conduct) and (2) the general public (i.e., citizens) when its demands are related to bureaucracies' public goals (i.e., moral conduct).

First, we argue that political principals can induce grave reputational consequences when they allude to bureaucratic failure to follow professional standards and legal rules, as well as deliver on performance targets—the very reason independent bureaucratic institutions are created and the very core *reputational uniqueness* aspects that set them apart from political institutions or any other organizations in a political system (Carpenter 2001; Maor and Sulitzeanu-Kenan 2016). We, therefore, anticipate bureaucrats to be exceedingly sensitive to political principals' claims challenging their aptitude to prompt and maintain the belief across multiple audiences that they are the most appropriate actor for the technical, legal-procedural, and performative responsibilities delegated exclusively to them.

We further argue that a bureaucrat's choice to prioritize political principals' demands of a technical, legal, and performative nature is motivated by principals' aptitude to inflict grave *reputational losses across the three dimensions of bureaucratic reputation in the eyes of multiple audiences observing bureaucratic organizations' conduct* rather than on a bureaucrats' choice to engage in "sanctioned acceptance" (Carpenter and Krause 2015). In other words, bureaucrats choose to prioritize specific demands of political principals not because they blindly adhere to all demands originating from political principals but because such a response strategy is estimated to be the best way to cultivate a bureaucratic reputation for credibility, legal diligence, and effectiveness (Krause and Douglas 2005; Krause and Corder 2007). While demands regarding moral bureaucratic conduct are outside political principals' influence realm and, therefore, not prioritized, we expect bureaucrats to most strongly prioritize political principals' demands concerning their (1) adherence to the highest professional, technical, or scientific standards; (2) compliance with formal rules and legal procedures; (3) capacity to effectively accomplish its targets for mandated tasks. Accordingly, we hypothesize:

Hypothesis 5a, b, c: Bureaucratic responsiveness to demands related to (a) technical, (b) legal-procedural, and (c) performative conduct is strengthened when these demands originate from political principals.

Second, as argued above, bureaucrats may choose to directly prioritize the general public's demands to correct for their democratic legitimacy deficit (see Hypothesis 2). We extend this argument by suggesting that bureaucrats will more strongly prioritize citizens' wishes when these directly target the delivery of public goals that carry broader moral and ethical implications. We argue that bureaucrats engage in direct interactions with the public and particularly use their

discretion to reflect the interests of citizens when these exercise moral demands, because acting “objectively” to pursue subjective interests and goals may contribute to enhanced reputation in the eyes of professional networks but may bring grave reputational damage in the eyes of ordinary people (Rivera and Knox 2023). We, therefore, anticipate that bureaucrats will use their bureaucratic discretion to act with moral agency if the demand originates directly from citizens and addresses moral conduct, i.e., concerns about the bureaucracy’s commitment to the highest ethical standards and moral values. In sum, by engaging in well-calculated management of external audiences’ expectations by attending to the external demands of stakeholders that are in the best position to damage their bureaucratic reputations, bureaucrats can manage the adverse consequences that these external demands may have on the unique bureaucratic reputation, if left unattended. Studies on regulatory responsiveness to external demands have provided empirical evidence in line with these expectations (Koop and Lodge 2020; Moschella, Pinto, and Martocchia Diodati 2020; Rimkutė 2020b; Reh, Bressanelli, and Koop 2020; Rimkutė 2018). For example, Rimkutė (2018) has shown that risk regulators issue more stringent regulatory measures—e.g., a ban on bisphenol A (a chemical compound used in the manufacturing plastics) in infant feeding bottles based on the precautionary principle—if the general public voices strong concerns about the safety and health of the most vulnerable groups (e.g., infants), whereas agencies that face stronger demands from political principals or professional peers focus on emphasizing scientific rigor, due process, and effectiveness in their risk regulatory outputs. Similar responsiveness patterns have been observed in scholarship focusing on financial regulators. For example, research on the European Central Bank (ECB) communications identified “the match between societal concerns and the topics covered in ECB policymakers’ communication” (Moschella, Pinto, and Martocchia Diodati 2020, 414). The scholars suggest that the ECB was

responsive to the rising dissatisfaction of EU citizens with financial instability within the Economic and Monetary Union and went above and beyond its legal mandate and formal responsibilities to attend to this concern. Accordingly, we hypothesize:

Hypothesis 6: Bureaucratic responsiveness to demands related to moral conduct is strengthened when these demands originate from the general public.

Methodology

We conduct a pre-registered discrete choice experiment (DCE) among bureaucrats working at EU agencies and bodies (see Online Appendix I) complemented with semi-structured interviews (Online Appendix IV). In this section, we outline the research setting, subject recruitment, and the experiment's design and procedures.

Research setting

We examine top-level bureaucrats who work at EU independent agencies because prioritizing among external demands has been documented to be particularly important in the EU polity. Compared to national and federal agencies, EU-level independent agencies operate in a multilevel setting that encompasses a wider range of conflicting demands and severe public accusations (e.g., see Busuioc and Rimkutė 2020). EU agencies are subjected to multiple principals (e.g., the European Parliament and the European Commission) as “European institutional architecture has been carefully designed to avoid any concentration of power” (Dehousse 2008, 790). The same holds true in the context of other relevant audiences—e.g., professional peers, industry representatives—closely observing the conduct of EU agencies and voicing their demands. This places EU agencies in an environment that is marked by a multiplicity of conflicting and competing demands to which they must attend. As non-majoritarian institutions, deficits in

EU agencies' legitimacy necessitate receptiveness to stakeholders' criticism, as failure to balance between conflicting external expectations can be fatal given their grave legitimacy and accountability issues (Braun and Busuioc 2020). This empirical setting provides a unique opportunity to discern carefully crafted responsiveness practices designed to attend to simultaneous, multidimensional external demands on which an EU agency's success, and even institutional survival, is contingent.

In addition to the theoretical relevance, focusing on EU-level independent agencies is highly relevant, both practically and societally. Far-reaching responsibilities are delegated to EU-level agencies that affect the lives of 447 million citizens in 27 EU Member States directly in domains that contribute to EU social and economic (regulatory) policies. Scholars have noted that the delegation of regulatory and executive tasks to EU-level agencies is "profound and incessant" (Rimkutė 2021, 221). So far, forty-six EU agencies and bodies have been established to support to EU institutions and member states in their regulatory and executive tasks (for a comprehensive description of the creation, variety, and evolution of EU agencies, please see: Busuioc, Groenleer, and Trondal 2012; Rimkutė 2021; Rittberger and Wonka 2015). These EU agencies assume a critical role in diverse domains, spanning areas such as human/animal/plant health, food safety, pharmaceuticals, chemicals, environmental protection, financial markets, energy supply, air traffic and safety, (cyber) security, education, and justice. Notwithstanding the heterogeneity in the design of EU agencies, encompassing varying degrees of independence, assigned roles and responsibilities, as well as the extent of their *de jure* and *de facto* powers, these agencies assume an important role in the EU political system. However, despite the well-documented tendency of EU agencies to expand the boundaries of the European regulatory state by extending to policy domains that were traditionally reserved for national institutions, there remains a need of

comprehensive exploration concerning the implications inherent in the EU agency governance model.

Subject recruitment

On 24 June 2021, an email invitation to participate in the study was sent to individuals who work at 46 EU agencies and bodies whose email addresses were publicly available, and a reminder was sent on 1 September 2021. 132 of 1375 individuals completed the questionnaire, for a response rate of 9.6%.

Twenty-seven of 46 EU agencies are represented in our sample. 27.3% of the sample identify as female, and the respondents' mean age is 49.4 years with an average organizational tenure of 10.7 years; 40.9% of the participants hold a master's degree or equivalent, and 30.3% have a PhD degree or equivalent. With respect to their organizational roles, 27.3% of the sample hold a managerial position.

The DCE was constructed using a fractional factorial design: "... a sample from the full factorial selected such that all effects of interest can be estimated" (Lancsar and Louviere 2008, 667), which was generated using the R package by Aizaki (2012). The fractional factorial design consisted of 24 choice sets, which were divided into three separate blocks (A, B, C). Each participant was assigned randomly to one of the three blocks, and thus, indicated prioritization preferences among eight choice sets that were presented to the respondents in random order. A one-way ANOVA reveals no statistically significant differences between the three blocks with respect to the participants' gender, age, tenure, education level, and organizational role, indicating that the random assignment was successful (Appendix A).

For the purposes of this study, the separate external demands that were presented to the participants serve as the unit of analysis. Thus, our sample of respondents yields an analytical

sample of 2112 observations (132 respondents who prioritize 8 choice sets, each of which consists of 2 options, i.e., $132 \times 8 \times 2$). This study's use of a discrete choice experiment is highly suitable to analyze a relatively small sample of elite decision-makers. Although the response rate of the study is in line with survey experiments among elites (cf. Kertzer and Renshon 2022), a limitation of this study is the unavailability of information required to determine representativeness of the study's participants to the wider population. Purposive sampling strategies among elites generally produce consistent and unbiased estimators of population parameters (López 2023). Nonetheless, we emphasize that this study is unable to determine the sample's representativeness to the wider population.

Utilizing a sequential mixed-methods design, we conducted semi-structured interviews to inform the real-time prioritization decisions of bureaucrats. Through analysis of their justifications and considerations for prioritization decisions, the interviews inform the theoretical mechanisms through which the characteristics of external demands affect bureaucratic responsiveness. The interview data were collected between November 2021 and March 2022 with 16 EU agency bureaucrats who completed our survey and indicated that they would be willing to elaborate on their responses in an online interview with the researchers. The interviews lasted 91 minutes on average. Our interviewees represent 14 EU agencies that cover regulatory or executive mandates. Seven are in a directorate/management position, while nine are responsible for the primary processes (e.g., technical, scientific, research, or other substantive functions). Their average organizational tenure was 9.75 years (Online Appendix IV).

Experimental design, procedures, and operationalization

The DCE is pre-registered² and received departmental ethics committee approval (Online Appendix VI) before the data were collected. The DCE presents participants with eight consecutive pairs of external demands in random order that vary according to the features of *source* (from which stakeholder does the demand originate?), *content* (what aspect of organization conduct does the demand concern?), and *salience* (has the demand received widespread adverse media attention?). For each pair, the participants indicate which of the two requests their organization would need to prioritize. The vignette and an example choice set are given in Appendix B. The full fractional factorial design that outlines all choice sets is given in Online Appendix II.

Table 1 provides the operational definitions of the three features' different levels. To operationalize relevant sources of external demand, we consulted EU agency scholarship to define political principals and other relevant stakeholders. Although EU agencies have multiple principals, we select the European Parliament and the European Commission as the most crucial (cf. Busuioc 2013; Dehousse 2008). Broader government agency scholarship argues that agencies are receptive at times not only to their political principals, but to a wider range of stakeholders, including private interest groups, professional peers, scientific experts, and/or mobilized public interests (Braun and Busuioc 2020). To that end, we included a diverse set of potentially relevant stakeholders to be able to capture different actors' relative relevance to bureaucratic prioritization decisions.

To operationalize the content of demands, we followed Carpenter and Krause's (2012) conceptualization of four reputational dimensions that bureaucrats are expected to uphold. We include four levels that concern technical, performative, legal-procedural, and moral bureaucratic

conduct. For salience, we differentiate between demands that attract extensive adverse media attention and those that do not.

To measure the dependent variable, the participants were asked the following question: “In your opinion, which request should your organization prioritize for a response (e.g., provision of an explanation, justification, clarification)?”, with “Request 1” and “Request 2” as answer categories.

In assessing the DCE’s ecological validity, 91% of the participants indicate that their organization faces similar requests in practice, while only 9% indicate that their organization does not encounter such requests (Online Appendix III). Nonetheless, we acknowledge a potential external validity limitation, as the abstract manipulations may not entirely capture the contextually embedded nature of real-world decision-making. We suggest that future experimental research should consider using richer and more context-specific manipulations to strengthen external validity.

[Table 1 Here]

Follow-up interviews and procedures

The semi-structured interviews consisted of two parts. The first set of questions was designed to shed light on which levels within the features (source, content, salience) the interviewees would prioritize and *why*. The second set of questions consisted of eight additional pairs of demands that varied in *source*, *content*, and *salience*. The findings of our quantitative analysis informed the scenarios’ content, with the intention to collect qualitative data that reveals the decision-making processes that lead to the prioritization decisions.

Analysis and Results

The study's hypotheses are tested using a generalized linear mixed-effects model with random variance components for the level of individual respondents and agencies. A generalized linear model is appropriate due to the binary nature of the dependent variable, while random effects allow to isolate the relationships of interest from potential confounding, unobserved variation on the level of individuals and agencies. Figure 1 visualizes the effects of the independent variables (relative to the reference category) on the dependent variable (prioritization decisions) as log odds (β). The full statistical model is reported in Appendix C Table C1.

[Figure 1 Here]

The analysis indicates that bureaucrats are most likely to prioritize demands from their political principals (i.e., the European Parliament and the European Commission), compared to all other stakeholders. While the European Commission's demands are slightly more likely to be prioritized than those of the European Parliament, this difference between both political principals is not statistically significant ($\beta = .26$; $p = .116$). Therefore, Hypothesis 1 finds strong support.

The interview data provide relevant insights into the underlying mechanisms of bureaucrats' responsiveness to their political principals. European Parliament Members are perceived as legitimate representatives of the public interest and, therefore, it is considered important to prioritize their demands: "The European Parliament represents people's voice. Hence, in a way, it would be also democratically correct to prioritize the Parliament" (Interviewee #12). In contrast, the European Commission is seen as a professional overseer that holds not only a

formal mandate to oversee EU agencies' performance and budgets, but also a good understanding and substantive knowledge of EU agencies' roles, functions, and daily activities: "We have a functional hierarchy with the European Commission. In plain words, they are our bosses, they are political masters. And while the agency remains technically independent, we are an EU agency working under the direction of the executive arm of the EU, which is the Commission" (Interviewee #11).

Figure 1 shows that the general public's demands are prioritized more than those of corporations ($\beta = -.91, p < .001$) and scientific experts ($\beta = -.47, p = .002$), but less than those of the European Parliament ($\beta = .48; p = .003$) and the European Commission ($\beta = .74; p < .001$). The prioritization of demands from the general public does not differ significantly from prioritization of demands by national agencies ($\beta = -.21; p = .188$). As the general public's demands are not among those that bureaucrats prioritize most, hypothesis 2 is rejected.

The interviews reveal that the tendency to overlook requests that derive from the general public is related to citizens' unfamiliarity with EU agencies' activities, limiting their ability to express demands that are within the confines of the agencies' mandates. The interviewees emphasized that they chose to respond to the general public's requests indirectly by being responsive to those of the European Parliament that represents EU citizens directly—"the European Parliament is the voice of the European citizens" (Interviewee #12)—and the European Commission that serves as the guardian of the EU Treaties.

Our theoretical expectations specify the effect of media salience on bureaucratic responsiveness. The results in Figure 1 indicate that media salience has a positive effect on bureaucratic responsiveness ($\beta = .78, p < .001$). This provides support for the theoretical expectation that bureaucrats are more likely to respond to demands that have received adverse

media coverage (Hypothesis 3). Further, we model interaction effects to test whether high salience moderates the relations between the external demands' content and bureaucratic responsiveness (see Appendix C Table C2). Figure 2 visualizes how the effects of a demand's source are conditional on the level of salience, including 95% confidence intervals. We find that responsiveness to legal-procedural demands with high salience is not statistically different from legal-procedural demands with low salience ($\beta = 0.36$; $p = .182$). Therefore, Hypothesis 4b is rejected. The analysis provides evidence that media salience strengthens prioritization of technical demands ($\beta = 1.17$; $p < .001$). Responsiveness to technical demands is more than three times as likely when salience is high. This provides support for Hypothesis 4a. Expanding on the theoretical expectations, we find that high media salience strongly strengthens bureaucratic responsiveness to moral demands ($\beta = 2.10$; $p < .001$): Moral demands without high media salience have the lowest probability of being prioritized, while those with high media salience receive bureaucratic actors' highest priority.

[Figure 2 Here]

Our interview data provide relevant insights into why the presence of extensive media criticism plays a crucial role in prioritization decisions. The interviewees noted that media scrutiny amplifies the urgency of demands, necessitating a swift and decisive response to effectively uphold and protect the agency's esteemed reputation. Nevertheless, the interviewees underscored that the salience of a demand, despite garnering substantial negative media scrutiny, should not be automatically equated with its perceived significance, as evidenced by the subsequent illustration: "We would want not to miss the opportunity to get the clarification in the media. But not because we would then consider this request more important, but because of the urgency and not being in

control of the timeline when media are involved. It is the urgency, not the importance. So, it is not that we only act if there is media attention. That is not the message that I would like to convey” (Interviewee #16).

Our interview data yield empirical support for the expected causal mechanism that reputational considerations play a decisive role in justifying the prioritization of demands that encounter adverse media coverage. The interviewees posited that adverse media attention constitutes a direct reputational peril, serving as a catalyst for bureaucrats to promptly and diligently respond, aiming to attenuate potential harm inflicted upon their agency’s reputational standing. They underscored the significance of employing a vigilant and efficacious approach in addressing public allegations: “A journalist could say something that for us would be a serious reputational issue, and we should go and attack that with all the forces and strength we have [...]. If they don’t consult us before publication, the risk is definitely to have a reputational damage. So far it has never happened. But if it happens, it should clearly have the priority. We are extremely cautious” (Interviewee #14).

Furthermore, our interview data offer pertinent insights into the significance of safeguarding technical reputation when confronted with adverse media coverage directed at the respective dimension of reputation. The interviewees highlighted the imperative of upholding the perception among relevant audiences that EU agencies are credible and possess technical expertise, given their lack of formal enforcement mechanisms, relying instead on Member States’ willingness to adhere to the information and technical advice they provide. Consequently, in the event of critical media scrutiny of an agency’s technical conduct, it is accorded utmost priority, as exemplified by:

Negative media attention is important to us because it reaches the public and it touches our credibility as an authority. We do not have a lot of real tools at the end of the day. If you look at our regulation, we have quite a big mandate [...]. But we get a water pistol to patrol it, right? It's not real tools that we have. So, our only real tool is our credibility as an organization and this is, of course, a clear threat to the functioning of the authority if you get negative attention. Negative attention could be very harmful. (Interviewee #5)

The interviews also shed light on how critical media attention amplifies the importance of moral demands, highlighting their potential as imminent threats to reputation that are difficult to refute: "There are a lot of excuses for a low performance, no excuse for legal breaches and moral (mis)conduct. [...] putting in doubt the moral conduct of an institution, I think, it's a big accusation and it should have priority over everything to clear the name of the institution" (Interviewee #13).

As proposed in Hypothesis 5, we theorize that bureaucratic responsiveness to technical, performative, and legal-procedural demands will result in higher responsiveness when exercised by political principals (i.e., European Parliament and European Commission). Figure 3 visualizes log odds (with 95% confidence intervals) of responsiveness to technical, performative, and legal-procedural demands by the European Parliament, as compared to the other stakeholders considered in the analysis (full statistical results in Appendix C Table C3a). We find that the European Parliament can most commandingly voice demands about agencies' technical conduct, as the difference with all other actors in the analysis is statistically significant. Responsiveness to both performative and legal-procedural demands increases when issued by the European Parliament as compared to corporations, scientific experts and the general public. However, responsiveness to the Parliament's performative demands is lower than the European Commission's performative demands ($\beta = 1.15$; $p = .015$), and is not statistically different from national agencies ($\beta = 0.84$; p

= .069). Similarly, responsiveness to legal-procedural demands of the Parliament and Commission are not statistically distinguishable ($\beta = -0.49; p = .280$), and we find that legal-procedural demands by national agencies (professional peers) are responded to more strongly than similar demands by the European Parliament ($\beta = 1.28; p = .018$).

[Figure 3 Here]

Figure 4 visualizes the prioritization log odds (with 95% confidence intervals) for stakeholders' technical, performative, and legal-procedural demands, relative to the Commission (full statistical results in Appendix C Table C3b). We find that the Commission is particularly well-positioned to voice performative demands, as these result in higher responsiveness than all actors but national agencies ($\beta = -0.31; p = .491$). Responsiveness to the Commission's technical demands is higher than scientific experts and the general public, statistically indistinguishable from national agencies and corporations, and notably lower than technical demands that are voiced by the European Parliament ($\beta = 1.13; p = .033$). For legal-procedural demands, odds for responsiveness to the Commission's demands are not statistically different than most other actors, but higher than scientific experts ($\beta = -2.21; p < .001$) and lower than national agencies ($\beta = 1.77; p < .001$).

[Figure 4 Here]

Overall, the experimental findings support the overarching theoretical expectation that, depending upon the demand's content, political principals can make more authoritative claims than others. We find that the European Parliament can most authoritatively exercise technical demands,

while the Commission's demands about performative agency conduct elicit high bureaucratic responsiveness. Our interview data demonstrate that reputational considerations underlie these findings. The interviewees state that their political principals hold strong authority and are equipped better to inflict damage on agencies' technical, legal, and performative reputation than other stakeholders. The European Parliament and the Commission are overseers that delegate tasks to EU agencies formally and possess formal powers as well as substantial knowledge about agencies' core expertise and activities. Consequently, these stakeholders' technical, legal, and performative demands are not disregarded as unsubstantiated allegations easily, as might be the case if such demands originate from other stakeholders. In particular, our interviewees describe the way performative requests from the Commission are a clear indication that the Commission must have a well-reasoned criticism and their request needs to be addressed urgently and diligently to prevent potential reputational losses: "If the European Commissioner is questioning the accomplishment of goals, mandate, and tasks of the agency, it's because they have hard proof. For me, it would be far more worrying. I would definitely go for the European Commissioner's request" (Interviewee #14).

Finally, hypothesis 6 states that stakeholder demands about moral conduct will result in higher bureaucratic responsiveness when voiced by the general public. Figure 5 visualizes prioritization log odds (with 95% confidence intervals) for stakeholders' moral demands, relative to moral demands by the general public (full statistical results in Appendix C Table C3c). The results provide partial support for the theoretical expectation, as we find that the general public does not more forcefully exercise moral demands than scientific experts and national agencies. Crucially, however, we find that the general public's moral demands evoke higher responsiveness

than moral demands issued by the European Parliament ($\beta = -2.17$; $p = .001$) as well as the European Commission ($\beta = -1.04$; $p = .026$).

The interviews shed light on this striking finding as interviewees note explicitly that, because of reputational considerations, they tend to be highly responsive to moral misconduct claims that originate from the general public. In contrast to political principals, the interviewees perceive the general public as having a greater standing in matters concerning moral and ethical claims, primarily due to the subjective nature inherent in such claims: “The public knows better about these things. Moral or ethical standards are very personal, and if you see that the general public feels strongly and expresses concerns, you need to deal with it. I think, that is for reputational purposes, and again it clearly impacts our moral outlook when it comes to the general public” (Interviewee #12).

[Figure 5 Here]

Discussion

This study corroborates findings from prior research that bureaucrats are most responsive to political principals’ external demands (e.g., Aleksovska, Schillemans, and Grimmelikhuijsen 2022; Bach et al. 2022) and to external demands that have received extensive criticism from the media (e.g., Bach et al. 2022; Erlich et al. 2021; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Müller and Braun 2021; Rimkutė 2020b; Salomonsen, Boye, and Boon 2021). Our findings show thereby that the source and salience account for substantial variation in bureaucratic responsiveness to external demands. The source and salience feed into bureaucratic deliberations and play a considerable role in influencing bureaucrats’ decisions to prioritize giving attention to

a particular set of demands. Our qualitative data reveal that reputational dynamics serve as a driving mechanism behind bureaucrats' responsiveness to political principals and to issues of high salience. Nonetheless, our data cannot refute the explanation that responsiveness to media salience may also align with theories of political control, given that media coverage is likely to trigger political control behaviors. Subsequent research endeavors could delve into the relative explanatory power of competing causal mechanisms that underlie bureaucrats' responsiveness to external demands.

Our study's most important contribution is that it extends knowledge on bureaucratic responsiveness by identifying theoretically and practically meaningful interactions between external demands' source, content, and salience. While several studies have shown that public agencies may choose to emphasize external demands that threaten their agency's bureaucratic competencies on occasion, public administration scholarship stresses often that bureaucratic actors must attend simultaneously to all substantive allegations, including those related to technical, performative, legal-procedural, and moral conduct (Carpenter and Krause 2012). Our findings also point to this delicate balancing act, as our quantitative and qualitative analysis reveals no clear order of importance between these dimensions (see Online Appendix V). Previous research has shown that agencies prioritize those substantive allegations that are at the core of their reputational uniqueness or for which they hold a poor reputation (Bach et al. 2022; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Müller and Braun 2021).

We provide a novel explanation by showing the way that the source from which the demand originates moderates the relation between the external demands' content and bureaucratic responsiveness. In this way, bureaucrats are more responsive to certain stakeholders than others depending upon the external demand's content. The results reveal a greater responsiveness to

moral demands originating from the general public compared to political principals, driven by the general public's capacity to wield substantial reputational threats on the moral conduct of EU agencies. Furthermore, we find that political principals can make more authoritative claims about technical and performative agency (mis-)conduct. Our qualitative analysis corroborates that demands that target technical, performative (as well as legal-procedural) bureaucratic responsibilities are considered to pose a more significant risk to inflict serious damage on an agency's reputational standing if they derive from political principals. The interviewees state that such demands are considered to originate from a credible source that targets EU-level agencies' primary organizational responsibilities, and, as a result, they receive bureaucrats' undivided attention and priority. Our qualitative data further provide evidence that when political principals criticize bureaucratic competence, it is perceived as inherently more worrisome and is regarded as inflicting severe reputational damage. In other words, such criticism potentially carries dire implications for the ability to attain a favorable technical and performance assessment.

In addition, we have observed that diverse political principals' demands are not equally consequential: European Parliament Members, as elected representatives, wield the greatest influence when it comes to voicing demands related to agencies' technical conduct, while the European Commission, as the professional overseer, possesses the most authoritative leverage in terms of performative demands. This observation indicates the need for refining our hypotheses (Hypothesis 5a, b, c) and emphasizes that different political principals present unique reputational threats, ultimately resulting in varying agency responsiveness decisions. Building on our theoretical and empirical contribution, future scholarship could further theorize about the conditions behind the varied bureaucratic responsiveness decisions induced by a diverse set of political principals, such as elected representatives and professional overseers. Such endeavors

would enable further development of theoretical and empirical insights of bureaucratic responsiveness in the context of the multiple-principal political systems.

Another way in which this study extends previous research on bureaucratic responsiveness is that it shows that media salience in particular strengthens responsiveness to external demands of a technical or moral nature. Although our analysis shows that media salience has an independent, direct effect on bureaucratic responsiveness, the results show that such media attention matters more strongly when it targets technical and moral bureaucratic responsibilities. EU-level bureaucrats in particular endeavor to maintain a positive reputation for their *technical competence* and *credibility* to be considered a reliable provider of trustworthy information, which is particularly important because of their limited discretionary powers. Our data suggest that EU agency bureaucrats do indeed constrain their bureaucratic behavior by adhering to the core tasks that they have to deliver in the EU political system, and that bureaucratic professionalism serves as an internal check on bureaucratic responsiveness decisions.

In addition to scientific contributions, our study has important implications for public administration practice. As government agencies face simultaneous and heterogeneous external demands to explain, justify, or clarify organizational conduct, bureaucratic responsiveness in practice requires external stakeholders' demands to be prioritized. The comprehensive framework on which this study rests (including external demands' source, content, and salience) may be of use to officials responsible for agency communication, as well as public managers who seek to mitigate organizational misconduct, to guide such prioritization decisions. While recent research in *Public Administration Review* draws solely on managerial attention to problems of a performative nature (e.g., Hansen and Nielsen 2022; van der Voet and Lems 2022) our study demonstrates that bureaucratic actors must also attend to organizational misconduct of a technical,

legal-procedural, and moral nature, and must base their prioritization decisions upon the demand's source and salience.

While this study provides relevant theoretical, methodological, and empirical insights into one aspect of bureaucratic responsiveness—namely, *priority and response timing*—important research gaps persist when it comes to the level of *effort* and *resources* bureaucrats invest to diligently address a given external request. We know relatively little of how much effort, time, and resources bureaucrats invest in responding to demands that vary on multiple aspects (e.g., source and content). Furthermore, reputation theory shares with other theoretical frameworks its premise that bureaucratic actors must balance between multiple, competing demands, preferences or values (e.g., Bozeman 2007). Bureaucratic prioritization decisions may thus be driven by strategic, reputational considerations, but can potentially also result from bureaucrats' intrinsic motivations. It is therefore critical that future scholarship integrates experimental and statistical analyses to test the tenets of bureaucratic reputation theory with evidence concerning the underlying mechanisms of the theory. This study relied on interviews to document that strategic, reputational considerations are core drivers of bureaucratic responsiveness, and we encourage future research on bureaucratic reputation theory to explicitly examine the causal mechanisms of the theory.

Lastly, little is known of whether bureaucrats' choice to prioritize a given demand or decision to invest much effort and resources to issue a response to a particular demand are perceived as legitimate by multiple audiences observing their conduct (i.e., political principals, interest groups, professional peers, independent experts, citizens). Scholarship on bureaucratic responsiveness has been primarily confined to scrutinizing bureaucrats' choices, decision-making processes, and justifications. In stark contrast, the exploration of multiple audiences' perceptions

concerning the legitimacy of specific responsiveness decisions remains a void that has yet to be comprehensively investigated.

Our analysis does not provide support for the notion that bureaucrats will prioritize demands that the public-at-large expresses directly, which emphasizes that such demands may lack weight and credibility. This result is consistent with an analysis of bureaucrats' perceived influence on the US bureaucracy by Furlong (1998), which similarly shows bureaucrats consider other political actors over the general public. A potential explanation for this is that citizens may voice their demands and preferences directly as well indirectly via a range of stakeholders, such as politicians, interest groups, the courts and the ombudsman. In addition, one should note that direct responsiveness to citizens' demands poses significant challenges in the EU political system because it consists of 27 member states and just under 447 million people. It is, therefore, likely that this preference to prioritize political principals over the general public is attributable in part to the empirical setting that we studied. EU agencies operate at considerable distance from citizens and perform highly technical regulatory tasks (Majone 1997). Therefore, an avenue for future research is to consider proximity to citizens explicitly as a boundary condition of the mechanism by which bureaucracies are responsive to the general public's interests and demands. While relatively distant bureaucracies, including, for instance, the regulatory agencies of the EU and the US federal government, may be most responsive to issues their political principals express, agencies that operate in close proximity to citizens may be more likely to prioritize their demands directly. Within a national context, future research may incorporate variation with respect to citizens' proximity fruitfully in the design, for example, through a comparative analysis of regulatory agencies that maintain some distance from citizens (e.g., financial regulators) and

service provider agencies that are in direct contact with citizens (e.g., tax administration, welfare benefits distribution).

The abstract term ‘general public’ was used in the experiment to refer to EU citizens. This term commonly refers to citizens in the context of EU institutions and the relevant scholarship. However, a limitation of this term is that other stakeholders may claim to advocate demands on behalf of the general public, and that the general public is itself not a unitary actor. Our interview demonstrate that the term’s meaning was self-evident to the highly educated top-level bureaucrats operating at the EU-level. However, we suggest future studies to use a more straightforward operationalization (i.e., citizens) to capture this particular source of an external demand and its relevance to prioritization decisions.

As this discussion makes clear, our empirical investigation of bureaucratic responsiveness was conducted in a particular research context. The context of EU independent agencies is a rich case to study bureaucratic responsiveness because of their exposure to a multitude of stakeholders on multiple levels, as well as the importance of being responsive to external demands because of the absence of direct forms of legitimation (Braun and Busuioac 2020). While regulatory agencies in other contexts face highly similar characteristics (most notably in the US federal government), the situational specificity bars us from the formulation of ‘general’ theoretical propositions of bureaucratic responsiveness. However, in our view, for a general framework of bureaucratic responsiveness to be theoretically valid and practically applicable, it must incorporate rather than exclude relevant situational variation (O’Toole and Meier 2015). Our qualitative data also show that the interviewees invoked the particular context frequently to justify their prioritization decisions. Thereby, contextual variation reveals potential boundary conditions of the determinants of bureaucratic responsiveness, including for example, autonomy and proximity to citizens. Future

scholarship on bureaucratic responsiveness may harness such variation as a way to advance our understanding of a topic that is, and is likely to remain, at the heart of the bureaucracy's functioning in democratic political systems.

Conclusion

The extant literature on bureaucratic responsiveness has drawn our attention to the challenge that bureaucrats face when they must prioritize between simultaneous, multidimensional external demands (Bryer 2007; Gilad, Maor, and Bloom 2015; Maor, Gilad, and Bloom 2013; Saltzstein 1992). Public administration scholarship outlines diverse theoretical views on the type of demands to which bureaucracies are more likely to respond (e.g., Erlich et al. 2021; Gilad, Maor, and Bloom 2015; Koop and Lodge 2020; Müller and Braun 2021; Maor, Gilad, and Bloom 2013; Salomonsen, Boye, and Boon 2021; Besselink and Yesilkagit 2021), and has thus far relied on mostly (quantitative) observational data to provide empirical evidence of bureaucratic responsiveness. We built on this scholarship to make a novel contribution to the literature on bureaucratic responsiveness by examining further the way bureaucrats prioritize decisions between multiple simultaneous external demands using both experimental and interview data. Empirically, we focused on top-level bureaucrats working at EU-level independent agencies to study how external demands' source, content, and salience influence EU-level bureaucrats' prioritization decisions.

The main conclusions of this study are that bureaucrats prioritize responses to political principals' demands and those with high media salience. In addition, and consistent with theoretical expectations, our analysis generates novel evidence of the way that the demand's source and salience moderate the responsiveness to different substantive demands (i.e., technical, legal-procedural, performative, and moral conduct). Specifically, we find that technical and

performance-related demands are responded to most when expressed by political principals, while moral appeals tend to elicit greater responsiveness when they originate from the general public. Additionally, our findings suggest that heightened media attention, especially when it casts a negative spotlight on bureaucratic conduct of a technical or moral nature, prompts EU agency bureaucrats to attend to such demands first.

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Endnotes

¹We use the mainstream definition of the general public provided by the Cambridge dictionary “ordinary people, especially people who are not members of a particular organization or who do

not have any special type of knowledge”.

<https://dictionary.cambridge.org/dictionary/english/general-public>

²The pre-registration can be accessed online at https://aspredicted.org/blind.php?x=WBK_9ZV

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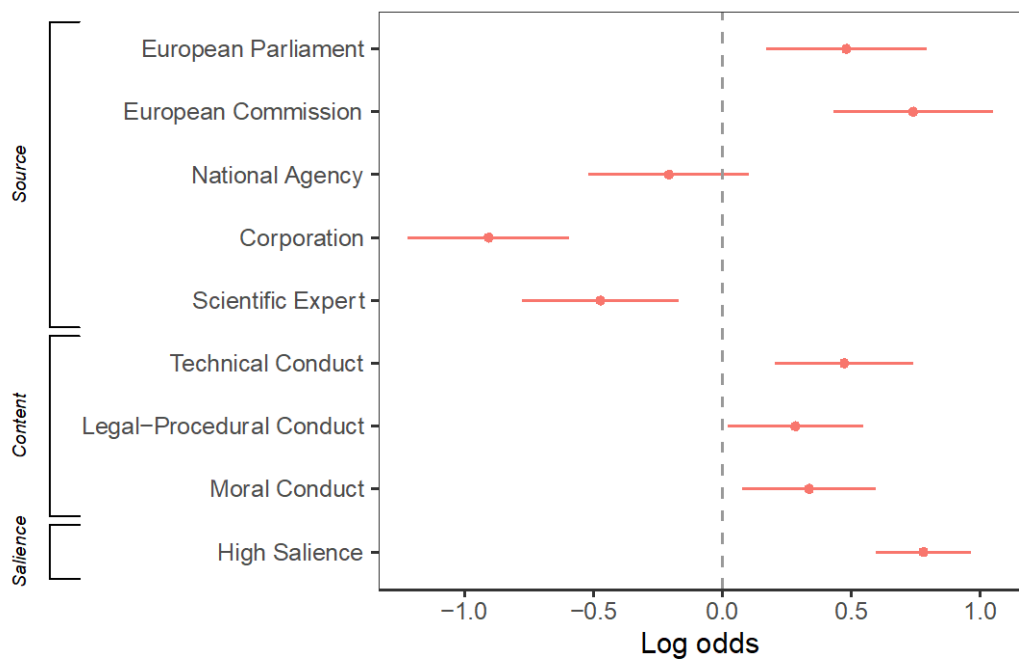
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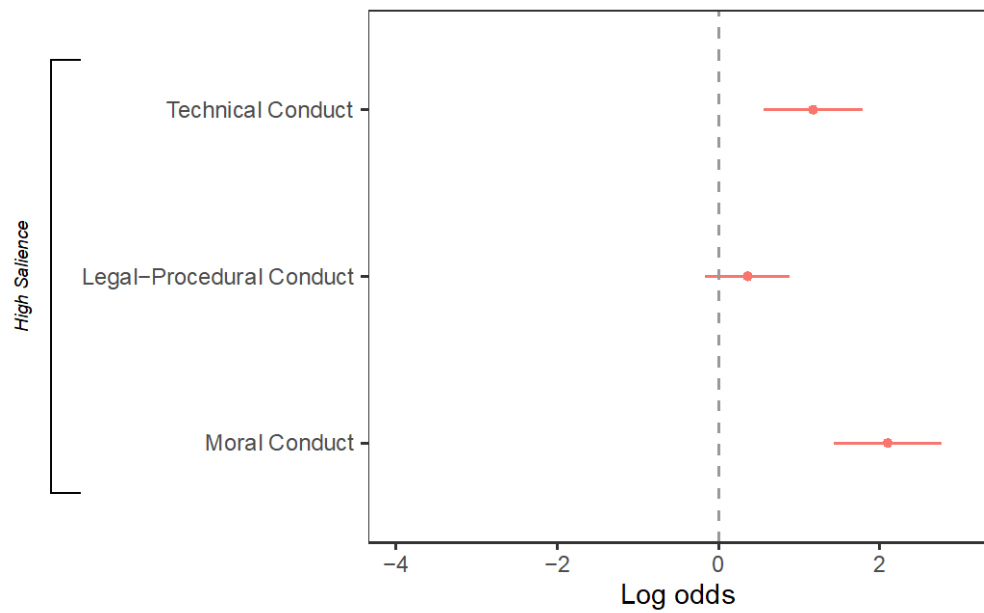
Tables and Figures

Table 1. Features, Levels, and Operationalization

Feature	Level	Operationalization
Source	European Parliament member	A Member of the European Parliament ...
	European Commissioner	A European Commissioner ...
	National agency head	A director of a relevant national agency ...
	Corporation	A large corporation ...
	Scientific expert	A scientific expert working at a research institute ...
	General public	The general public ...
Content	Technical conduct	... has expressed serious concerns about your organization's adherence to the highest professional, technical or scientific standards.
	Performative conduct	... has expressed serious concerns about your organization's capacity to effectively accomplish its goals and mandated tasks.
	Legal-procedural conduct	... has expressed serious concerns about your organization's compliance with formal rules and legal procedures.
	Moral conduct	... has expressed serious concerns about your organization's commitment to the highest ethical standards and moral values.
Salience	High salience	This request has received much negative media attention.
	Low salience	This request has not received any media attention.

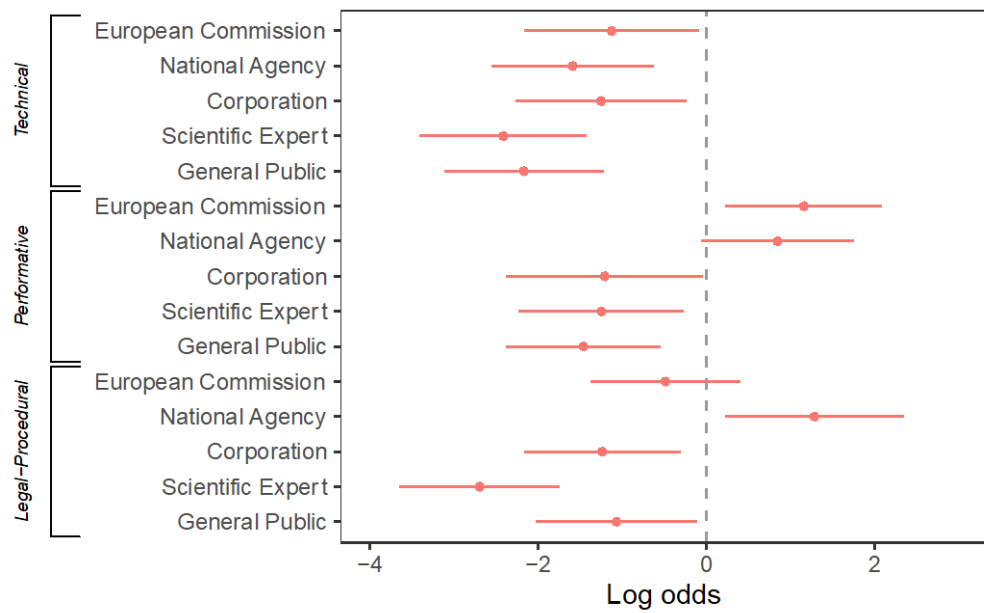
**Note:**

Reference categories are General Public (Source), Performative Conduct (Content), and Low Saliency (Saliency).
 Figure 1. Characteristics of external demands and bureaucratic responsiveness

**Note:**

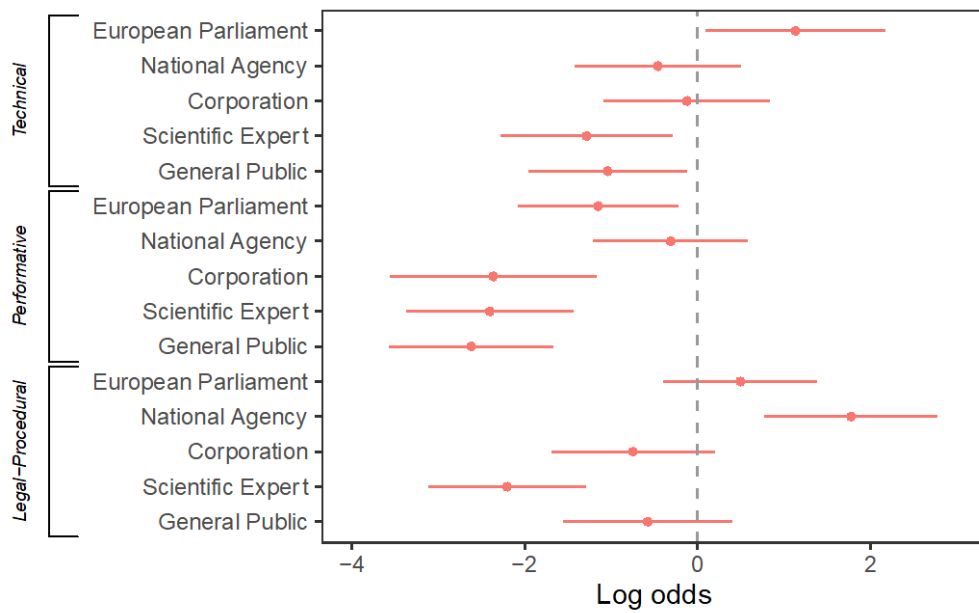
Reference categories are Performative Conduct (Content) and Low Salience (Salience).
All other estimates are modeled but not visualized.

Figure 2. Marginal effects of demand content under high and low salience

**Note:**

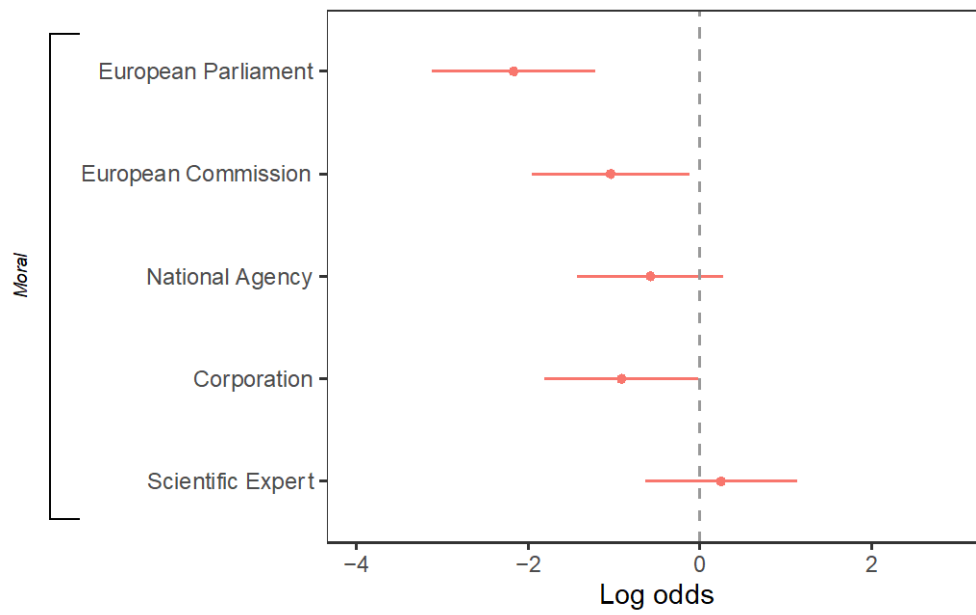
Reference categories are European Parliament (Source) and Moral Conduct (Content).
All other estimates are modeled but not visualized.

Figure 3. Marginal effects for the European Parliament's technical, performative and legal-procedural demands.

**Note:**

Reference categories are European Commission (Source) and Moral Conduct (Content).
All other estimates are modeled but not visualized.

Figure 4. Marginal effects for the European Commission's technical, performative and legal-procedural demands.



Note:
Reference categories are Technical Conduct (Content) and General Public (Source).
All other estimates are modeled but not visualized.

Figure 5. Marginal effects for the general public's moral demands.

Appendices

Appendix A: Balance check for random assignment to blocks A, B, C

Table A1. Balance check

	Block			One-way ANOVA test	
	A	B	C	F-value	p-value
Age	47.58 (10.24)	52.18 (7.05)	49.07 (7.16)	3.081	.052
Tenure	9.65 (8.18)	12.03 (6.78)	11.04 (6.64)	.975	.383
Education level	4.17 (0.90)	4.03 (0.80)	4.39 (0.63)	2.068	.134
Female gender	0.30 (0.46)	0.31 (0.47)	0.21 (0.41)	0.697	.501
<i>Organizational role:</i>					
Management	0.26 (0.44)	0.26 (0.44)	0.31 (0.47)	.159	.853
Primary processes	0.43 (0.50)	0.38 (0.49)	0.28 (0.46)	1.070	.348
Support staff	0.07 (0.26)	0.15 (0.37)	0.13 (0.34)	.801	.453

Note. Mean values and standard deviations are reported for age, tenure and education level. Proportions and standard deviations are reported for female gender and organizational role.

Appendix B: Experimental vignette and example of a choice set

In the survey, the following text introduced the experimental task:

We would like to ask you to consider the following situation: Imagine that two stakeholders have expressed critical concerns to which your organization's response is requested (e.g., provision of an explanation, justification, or clarification). On the following pages, you will be presented with eight pairs of simultaneous stakeholder requests. These requests differ with regards to their source, their content, and visibility. You can assume that the requests are equal in all other relevant characteristics. For each pair, we ask you to indicate which request needs a more immediate response from your organization.

Imagine that your organization faces the following two requests:

Table B1. Example of a choice set

	Request 1	Request 2
Source	A European Commissioner ...	The general public ...
Content	... has expressed serious concerns about your organization's adherence to the highest professional, technical, or scientific standards.	... has expressed serious concerns about your organization's compliance with formal rules and legal procedures.
Visibility	This request has not received any media attention.	This request has received much negative media attention.

In your opinion, which request should your organization prioritize for a response (e.g., provision of an explanation, justification, clarification)?

- Request 1
- Request 2

Appendix C: Regression tables

Table C1. Characteristics of external demands and bureaucratic responsiveness (Figure 1)

	<i>Model 1</i>			<i>Model 2</i>			<i>Model 3</i>		
	β	S.E.	<i>p</i>	β	S.E.	<i>p</i>	β	S.E.	<i>p</i>
Source									
European Parliament		(ref.)		-.26	.16	.116	.48	.16	.003
European Commission	.26	.16	.116		(ref.)		.74	.16	<.001
National Agency	-.69	.17	<.001	-.95	.17	<.001	-.21	.16	.188
Corporation	-1.39	.17	<.001	-.65	.17	<.001	-.91	.16	<.001
Scientific Expert	-.95	.16	<.001	-.21	.16	<.001	-.47	.15	.002
General Public	-.48	.16	<.001	-.74	.16	<.001		(ref.)	
Content (reference category: Performative conduct)									
Technical conduct	.47	.14	<.001	.47	.14	<.001	.47	.14	<.001
Legal-procedural conduct	.28	.13	0.036	.28	.13	0.036	.28	.13	0.036
Moral conduct	.34	.13	0.011	.34	.13	0.011	.34	.13	0.011
Salience (reference category: Low salience)									
High Salience	.78	.09	<.001	.78	.09	<.001	.78	.09	<.001
Constant	-.12	.15	.403	.13	.14	.351	-.60	.14	<.001
Observations	2112								
AIC	2677.884								

Note: Logistic regression coefficients are reported. Model includes random variance components for individual respondents and agencies.

Table C2. Interaction effects Salience * Source and bureaucratic responsiveness (Figure 2)

	Estimate	Standard error	p-value
Source (reference category: Corporation)			
European Parliament	1.20	.17	< .001
European Commission	1.31	.18	< .001
National Agency	.11	.19	.582
Scientific Expert	-.07	.18	.696
General Public	1.05	.17	< .001
Content (reference category: Performative conduct)			
Technical conduct	-.09	.20	.646
Legal-procedural conduct	.10	.19	.590
Moral conduct	-.69	.21	.001
Salience (reference category: Low salience)			
High Salience	-.14	.21	.509
Interactions Source * Content			
Technical conduct:High salience	1.17	.31	< .001
Legal-procedural:High salience	.36	.27	.182
Moral conduct:High salience	2.10	.34	< .001
Constant	-.84	.20	< .001
Observations		2112	
AIC		2641.26	

Note: Logistic regression coefficients are reported. Model includes random variance components for individual respondents and agencies.

Table C3a. Marginal effects for the European Parliament's technical, performative and legal-procedural demands (Figure 3).

	Estimate	Standard error	p-value
Source (reference category: European Parliament)			
European Commission	.35	.32	.269
National Agency Corporation	-.63	.31	.042
Scientific Expert	-.61	.36	.090
General Public	.53	.34	.118
	.67	.32	.036
Content (reference category: Moral conduct)			
Technical conduct	1.61	.38	< .001
Performative conduct	-.05	.33	.868
Legal-procedural conduct	.81	.33	.014
Salience (reference category: Low salience)			
High Salience	1.04	.15	< .001
Interactions Source*Content			
Technical conduct*European Commission	-1.13	.53	.033
Technical conduct*National Agency Corporation	-1.59	.49	.001
Technical conduct*Scientific Expert	-1.26	.52	.016
Technical conduct*General Public	-2.42	.51	< .001
Technical conduct*General Public	-2.17	.48	< .001
Performative conduct*European Commission	1.15	.48	.015
Performative conduct*National Agency Corporation	.84	.46	.069
Performative conduct*Scientific Expert	-1.21	.60	.043
Performative conduct*General Public	-1.25	.50	.013
Performative conduct*General Public	-1.47	.47	.002
Legal-procedural conduct*European Commission	-.49	.45	.280
Legal-procedural conduct*National Agency Corporation	1.28	.54	.018
Legal-procedural conduct*Corporation	-1.24	.48	.009
Legal-procedural conduct*Scientific Expert	-2.70	.49	< .001

Legal-procedural conduct*General Public	-1.07	.49	.028
<i>Constant</i>	-.52	.25	.033
Observations		2112	
AIC		2570.766	

Note: Log odds are reported. Model includes random variance components for individual respondents and agencies.

Table C3b. Marginal effects for the European Commission's technical, performative and legal-procedural demands (Figure 4).

	Estimate	Standard error	p-value
Source (reference category: European Commission)			
European Parliament	-.35	.23	.269
National Agency	-.99	.32	< .001
Corporation	-.97	.30	.006
Scientific Expert	.18	.35	.587
General Public	.32	.33	.307
Content (reference category: Moral conduct)			
Technical conduct	.48	.36	.187
Performative conduct	1.10	.34	.001
Legal-procedural conduct	.32	.31	.307
Salience (reference category: Low salience)			
High Salience	1.04	.15	< .001
Interactions Source*Content			
Technical conduct*European Parliament	1.13	.53	.033
Technical conduct*National Agency	-.46	.49	.344
Technical conduct*Corporation	-.13	.49	.798
Technical conduct*Scientific Expert	-1.29	.51	.011
Technical conduct*General Public	-1.04	.47	.026
Performative conduct*European Parliament	-1.16	.47	.015
Performative conduct*National Agency	-.31	.46	.491
Performative conduct*Corporation	-2.37	.61	< .001
Performative conduct*Scientific Expert	-2.41	.50	< .001
Performative conduct*General Public	-2.62	.49	< .001
Legal-procedural conduct*European Parliament	.49	.45	.280
Legal-procedural conduct*National Agency	1.77	.51	< .001
Legal-procedural conduct*Corporation	-.75	.48	.120
Legal-procedural conduct*Scientific Expert	-2.21	.47	< .001

Legal-procedural conduct*General Public	-.58	.50	.245
<i>Constant</i>	-.17	.23	.471
Observations		2112	
AIC		2570.766	

Table C3c. Marginal effects for the general public's moral demands (Figure 5).

	Estimate	Standard error	p-value
Source (reference category: General Public)			
European Parliament	1.50	.37	< .001
European Commission	.72	.38	.057
National Agency Corporation	-.73	.33	.029
Scientific Expert	-.37	.31	.237
	-.38	.33	.240
Content (reference category: Technical conduct)			
Performative conduct	-.96	.33	.004
Legal-procedural conduct	.30	.36	.399
Moral conduct	.57	.30	.057
Salience (reference category: Low salience)			
High Salience	1.04	.15	< .001
Interactions Source*Content			
Performative conduct*European Parliament	-.71	.50	.157
Performative conduct* European Commission	1.58	.55	.004
Performative conduct* National Agency Corporation	1.73	.50	.001
Performative conduct*Scientific Expert	-.66	.55	.225
Legal-procedural conduct*European Parliament	.46	.51	.368
Legal-procedural conduct*European Commission	-1.10	.52	.033
Legal-procedural conduct* National Agency Corporation	-.46	.56	.410
Legal-procedural conduct*Scientific Expert	1.77	.59	.003
Moral conduct*European Parliament	-1.09	.44	.014
Moral conduct* European Commission	-1.38	.50	.006
Moral conduct* National Agency Corporation	-2.17	.48	< .001
Moral conduct* Scientific Expert	-1.04	.47	.026
	-.58	.43	.182
	-.92	.46	.045
	.24	.45	.589

<i>Constant</i>	- .41	.21	.050
Observations		2112	
AIC		2570.766	