Street-Level Organizations as Experimental Settings:
Why Management Matters Even More

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Abstract

Often portrayed as the face of government, street-level organizations (SLOs) are the organizational setting that directly delivers public services to locally-defined policy-clientele. Due to the immediate, major implications of direct-delivery interactions for citizens, continued scholarly attention has been devoted to street-level implementation. This predominant focus highlights the well-known threefold role of SLOs, namely, delivering policies, mediating policies, and mediating politics; however, it overlooks a potential additional role of SLOs: serving as a source for policy innovation by exploring, experiencing, and experimenting with new policy instruments. Drawing on the Free SideWalk program implementation in Guadalajara, Mexico, our analysis demonstrates how a formal adoption of a new policy instrument follows one SLO’s attempts to address local implementation gaps, termed here street-level policy innovation. Shifting attention to the structural power of street-level management, this study responds to recent calls to employ a managerial perspective on implementation, and further uncovers the key, yet understudied, policy-clientele perspective on implementation.

Key words: Policy implementation; Street-level organizations; Street-level management
Introduction

Street-level organizations (SLOs, also known as “street-level bureaucracies,” “human service organizations,” or “frontline organizations”) are the organizational setting within which public services are directly delivered to locally-defined publics. While difficult to supervise, they nonetheless serve as the loci of organizational initiatives and are required to constantly adjust direct-delivery implementation in order to respond to the dynamically changing particularities of the local context (Smith 1965, see also Brodkin 2003; Evans and Harris 2004; Hill 2003; Hupe and Hill 2007; Lipsky 1980, 2010; Maynard-Moody and Musheno 2000, 2003; Sandfort 2000; Smith 2012). Recognizing that the direct delivery phase of implementation exerts immediate, major implications for citizens, extensive and varied scholarship has focused on the unique characteristics of street-level work in general, and in particular what influences discretion inherent to street-level implementation, and the ways it is exercised (e.g., Brodkin 1997, 2012; Maynard-Moody and Musheno 2000, 2003; Meyers and Vorsanger 2003; Riccucci, Meyers, Lurie and Han 2004; May and Winter 2009; Maynard-Moody and Portillo 2010; Sager, Thomann, Zollinger, van der Heiden and Mavrot 2014; Soss, Fording and Schram 2011; Smith 2012; Harrits and Møller 2014; Tummers, Bekkers, Vink and Musheno 2015).

Focusing on direct-delivery interactions with policy-clients has diverted attention to the role of SLOs in terms of implications for the public, suggesting that “because street-level organizations form the operational core of the state… their practices assume deep political importance, potentially building or undermining support for government as a vehicle for advancing social welfare, equity, and justice” (Brodkin 2012, p. 947; See Lipsky 1980; Smith 1965). Indeed, SLOs are considered to have “intrinsic importance to social well-being” (Lynn,
Heinrich, and Hill 2001, p. 5) and to represent “the face of government to many people” (Smith 2012, p. 442). Specifically, SLOs’ well-established threefold role comprises delivering policies, that is, carrying out policies that legislative and executive authorities determine; mediating policies by constructing policies on the ground through shaping their content and by distributing benefits and services; and mediating politics by voicing upwards the needs and priorities of policy-clients’ requirements (Brodkin 2013, see also Hoggett 2006; Smith 2012).

This predominant focus on direct-delivery interactions with citizens shifts attention from management of SLOs (Gassner & Gofen 2018; Lipsky 2010) and therefore overlooks potential, additional roles of SLOs in the policy sphere. For example, SLOs are the first tier of government to experience discrepancies between policy directives and local policy-clientele priorities, equipping them to be first to identify implementation gaps, which often require adjustments to better harmonize direct-delivery implementation arrangements with the particularities of the local context (e.g., Authors; Carey and Matthews 2017). What influences these adjustments and their implications for policy-clients is well-documented (e.g., Brodkin 2007, 2011; Maynard-Moody and Musheno 2000, 2003; Tummers, Bekkers, Vink and Musheno 2015), nevertheless, their potential upwards influences are understudied.

Shifting the focus to the role of SLOs from a policymaking perspective, this study suggests that SLOs may serve as a source for policy innovation by experimenting with new policy instruments, a process termed here as street-level policy innovation. To demonstrate street-level policy innovation, our analysis draws on the implementation of the SideWalk program in Guadalajara, a large city in Mexico, which aims at liberating sidewalks from wrongly parked vehicles. Originally, the program utilized a punitive approach (issuing fines), which produced undesired consequences during implementation, including confrontations with citizens and bribery practices. To address these implementation gaps, the punitive approach was replaced in
the SLO that implements the program with an educational approach that was introduced via a mix of policy instruments, including warning notices that temporarily replaced the use of fines. This replacement, which switched formally directed policy instruments with a different mix of instruments, was first introduced as an implementation adaptation. It was later deployed to additional implementation settings and eventually was formally recognized and adopted as a key facet of the city’s strategy, thus altering the transit and urban mobility policy of the local government.

In the following section, the well-documented roles of SLOs are reviewed, to convey that their potential role as a source for policy innovation is understudied. After specifying the research approach and the case, our findings present street-level policy innovation as an evolving process during which concrete efforts to address local implementation gaps, exercised through replacing a directed policy instrument with a new set of instruments, evolved to formal adoption of the new policy approach and instruments. Conclusions discuss theoretical and practical contributions.

Roles of Street-Level Organizations

Occupying an interstitial position between formal policymaking and a local public, SLOs such as fire stations, child protection agencies, social service organizations, police stations, schools, and health care clinics, are constantly required to balance inconsistencies between different formal policies implemented by the same organization and reconcile clashes between formal rules and policy-clients’ needs and priorities (Lipsky, 1980; Maynard-Moody & Musheno, 2000, 2003), especially because formal policies are often ambiguous and vague (Lipsky, 1980; Maynard-Moody & Musheno, 2000; Sandfort, 2000; Brodkin, 2003). Responsible for
transforming and operationalizing formal policies into street-level implementation, SLOs are provided with considerable discretionary power and serve as the connecting link between “steering” and “doing” (Gassner & Gofen, 2018), while playing a key role in structuring citizen-government relationships (Brodkin, 2013).

Initially termed as “frontline organizations,” Smith (1965) distinguished them as a distinct type of governmental agency according to three defining characteristics: (1) serving as the organizational initiative locus; (2) exercising tasks independently of other comparable units, while often developing an information monopoly about the environment within which they are embedded; and (3), the difficulty of being supervised, due to their need to respond to constant, ever-changing situations while located far away from centralized command. Lipsky’s (1980) seminal “street-level bureaucracy” further emphasized the importance of these organizations by distinguishing them as a unique sub-category within which a substantial proportion of employees are street-level bureaucrats, a unique and distinct sub-group of public workers that directly delivers policies. They operate by following rules as a “bureaucracy” at the “street-level,” that is, at a considerable distance from decision-making avenues and the center of power. To include non-governmental agencies that also directly deliver policies to the public, Brodkin (2013) has recently suggested replacing “bureaucracy” with “organization.”

Well-established scholarship emphasizes the distinct characteristics of SLOs, including substantial discretionary power, limited resources, an “action imperative” work mode, difficult to supervise, required to respond to constant changes and emergencies, and, in general, serving as the organizational setting that reconciles the constant discrepancies between policy directives and local policy-clientele priorities (Brodkin 2003; Evans and Harris 2004; Hill 2003; Hupe and Hill 2007; Lipsky 1980; Maynard-Moody and Musheno 2000, 2003; Sandfort 2000; Smith 1965; Smith 2012).
SLOs well-known threefold role, that is, delivering policies, mediating policies, and mediating politics (Brodkin 2013), emphasizes their significance not only for implementation but for the public sphere in general. SLOs are not simply state agents appointed to carry out policies determined by legislative and executive authorities. Rather, SLOs construct policies on the ground because, while formal directives provide the resources and authorize action, they are unable to control how they will be exercised on the ground, and also because of formal policies’ ambiguity, coupled with direct-delivery discretionary power, which shape policy content. SLOs also mediate politics by voicing the needs and interests of policy-clients to higher levels of management, thus facilitating channels for citizenry “making claims on the state, asserting rights, and seeking redress” (Brodkin 2013, p. 28, see also Hoggett 2006).

Moreover, unresolved tensions are inherent to SLOs for varied reasons, including being the sites “of policy conflicts” (Brodkin 2013, p. 26), serving as a site “wherein politically contested policy projects may be advanced indirectly through administrative means… that alter the arrangements and conditions of street-level policy work” (Brodkin 2013, p. 23) while acting as “the gatekeeper to the government benefits and an array of citizenship rights” (Smith 2012, p. 442). Furthermore, SLOs are positioned at “the intersection of conflicting needs and alternative definitions of the common good” (Hoggett 2006, p. 176), and indeed are the first tier of government to experience and identify implementation gaps that are relevant to a local clientele (Gassner and Gofen 2018).

By focusing on chief executive officers of SLOs, our study acknowledges the vitality and significance of SLOs, and responds to the recent calls, mentioned above, to employ a managerial perspective on implementation (Brodkin 2012; Hupe and Buffat 2014; Lipsky 2010; Meier 2009; Smith 2012; Winter 2012).
This paper proceeds as follows. SLOs’ roles are reviewed, to suggest that their potential role serving as experimental setting is understudied. After specifying the research approach and describing the case, findings define the process of street-level policy innovation and specify its phases drawing on the evolvement of the Free Side Walk program. Concluding remarks summarize the contribution of street-level policy innovation to theory and to practice.

Methods

To demonstrate that local efforts exercised by a SLO in order to address implementation gaps may be later adopted as a formal change of policy, analysis draws on theoretical sampling (Eisenhardt 2008), whereby a particular instance of local implementation adaptation is examined to refine ideas, develop emergent themes, assess their adequacy and relevance, identify conceptual boundaries, and elaborate on the evolvement of the process (Charmaz 2000). Tracing a policy change is fraught with methodological difficulties, especially as regards changes that are informally implemented rather than formally declared (Gofen & Needham 2015). The case study of Mexico, which had a persistent, well-documented, issue of illegal parking (Roque & Masoumi 2016) and demonstrated a clear-cut shift of policy approach, provided an opportunity to uncover the mechanisms through which on-the-ground implementation influences not only policy outcomes but also policy change. Although a case study of a single country with a small sample inhibits generalization, it allows undertaking exploratory data gathering and theorizing around upwards influence of implementation adaptation that has to come before large-scale comparative work (Yin 2008). Specifically, the case of implementing the Free SideWalk Program in Guadalajara, Mexico, demonstrates how an earlier policy approach (punitive) was distinctively replaced by a fundamentally different
approach (educational) in Guadalajara’s municipal government. This switch between approaches followed the adaptation introduced by the SLO in an attempt to address implementation gaps, mainly unintended consequences of uneasy interactions with citizens and ultimately bribery practices of frontline officials.

Both quantitative and qualitative instruments were applied to formulate an embedded case study design (Bryman 2012), as follows: To initiate rapport with members of the SLO in Guadalajara, a semi-structured open-ended group interview was conducted at the end of 2015 with five managers of the SLO, including the street-level manager (SLM), who occupies the sole top position in the SLO, four mid-level managers, including the general operation manager (GOM1), two members of the legal affairs unit (LA1/2), and the SLO’s director of the communication office (CO). These interviews provided a general understanding of the program and its implementation on the ground. Next, a structured non-participatory observation session was performed by two teams of researchers who each accompanied a group of five frontline officials (also well-known as ‘street-level bureaucrats’) operating the program during one regular day of work (see Appendix A for details on the observation scheme design). Observations documented frontline officials’ trajectories in the field and their interactions with law breakers, in addition to their interactions with the manager they directly report to, that is, the first-line manager (FLM) within the SLO.

Data collection also included semi-structured, open-ended interviews with managers of the SLO at two different points of time. The first wave took place in 2016 and focused on the underlying logic of the implementation adaptations. Interviews (N=5) were conducted with the street-level manager (SLM1), three mid-level managers (GOM1, LA1, CO) and the first-line manager (FOM), whose direct subordinates are the frontline officials. A second wave of interviews (N=5), which was conducted in 2019, included three repeated informants, now
former members of the SLO (SLM1, FOM and CO), and another two new informants who belonged to a SLO (SLM2 and GOM2) of a neighbor city (Zapopan). The follow up interviews with former members of Guadalajara’s SLO focused on the effects of adaptations into policy change. Interviews conducted with Zapopan officials aimed at understanding how policy changes in Guadalajara affected Zapopan’s policy change.

Implementation perspective of frontline officials who directly interact with law breakers was collected drawing on a semi-structured questionnaire (N=20, representing 80 percent of the SLO’s frontline personnel). Such data allowed triangulation (Hendren, Luo, & Pandey, 2018) as regards the claims of the SLO’s employees on the design and effects of implementation adaptations (see Appendix C). Because policies are “creatures of words” (Majone 1989), to allow for a systematic and comprehensive exploration, data also draws on formal in-house documentation, including policy plans, council member minutes, official press releases, and news articles to gauge policy changes enacted by relevant actors among other policy-relevant agents.

The Free Sidewalk Program

The Free Sidewalk program was implemented in Guadalajara to address the obstruction of sidewalks by wrongly parked vehicles, which has been a common issue in Mexico in general, and in Guadalajara in particular, mainly due to the growth in car ownership (Roque and Masoumi 2016) accompanied by a bad quality of public transportation and a poor level of basic infrastructure for the safety of pedestrians (Cortes, Gil, Orozco Núñez, Gatica Domínguez, & Cifuentes, 2016; García De Quevedo Najar, Gonzalez Pérez, & Aspillra Lara, 2018; Híjar, Vazquez-Vela, & Arreola-Risa, 2003). Guadalajara, which is among the largest
cities in Mexico (1.5 million inhabitants, INEGI, 2015), belongs to the Guadalajara metropolitan area, which includes additional eight municipalities, with a total of approximately 4.4 million inhabitants (CONAPO 2010).

Recognizing that the obstruction of sidewalks by cars frequently causes accidents with a high pedestrian mortality rate (Bartels, et al, 2010), in 2015, the newly-elected mayor decided to implement the Free Sidewalk program. The program’s importance within the agenda of the local government is reflected in the short time (less than a month) that passed after the mayor took office until the program was announced (Guadalajara Press Release, October 2015).

Notably, although the Mexican constitution establishes transit among the set of public safety functions assigned to municipalities (CPEUM 2019; Art. 115. III. H), many state governments have proclaimed legislation and institutions concerning local urban affairs (Meza, 2016). Such intergovernmental policy disputes are well documented in federal systems (Agranoff & Radin, 2014) and multi-level governance settings (Hooghe & Marks, 2003). This jurisdictional overlap has become a source of conflict, frequently resolved with the intervention of Mexico’s Supreme Court to clarify the roles of different levels of government (DOF, 2011). In the chaos, the design and implementation of public transit and parking policies in the country varies, depending on the historical institutions dictating the relationship between state and municipal levels of government (REF). As with other municipalities within the metropolitan area, such as the neighbor city Zapopan, Guadalajara, announced this program in 2015 amidst a political dispute with the state level government of Jalisco.

To discourage drivers from parking illegally and obstructing sidewalks, the program’s main instrument was issuing a ticket with an average cost of $111 USD per event, which varies depending on the type of law infringement (see portal.guadalajara.gob.mx/program-banquetas-libres). This cost represents a substantial burden for a regular citizen as it is approximately 15
percent of the average monthly household income in the city (ENIGH, 2016). The implementation of the program in Guadalajara has been exercised by a SLO of the municipality’s local government. At the beginning of the administration, this SLO, named the “Public Parking Unit Department,” was assigned as “responsible for authorizing activities related to public parking” (Parking Regulation Act - Municipal Gazzette, 2003; Art.2). Thus it was responsible for carrying out the parking regulations of the city of Guadalajara, comprised of a set of different types of parking rules including “Parking in public roads” (Parking Regulation Act- Municipal Gazzette, 2003; Art 7. III. C).

Daily implementation of the program included sending teams of frontline officials to survey a determined area in search of law breakers. If offenders are absent from their cars, frontline officials were directed to search for them in the nearby houses or businesses in order to ask them to move their vehicles. During the first period of implementing the program, frontline official teams were accompanied by a FLM who oversaw field operations, regularly supervising several field-teams’ operations from headquarters and also from the field in the early stages of the program (Milenio, 2015). Additional FLMs’ activities included providing support to frontline officials when required by field-level operations, collecting frontline officials’ observations with regard to field-level operations, and addressing further complications not stipulated in advance in a protocol of conduct. Regular meetings between FLM and frontline officers took place almost every day (Frontline officials’ questionnaire, see Appendix C).

**Street-Level Policy Innovation: Formal Adoption of Local Implementation Adaptations**

As presented above, the existing literature tends to focus on local implementation adaptation from a *downward* perspective, that is, how it is influenced by, and how it influences policy

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outcomes. Hence, suggesting an *upwards* perspective on implementation, the possibility that local implementation adaptation may be adopted as formal policy and thus contribute to a policy change, is overlooked. To allow for a more nuanced understanding of the potential contribution of implementation adaptation in SLOs to policy change, this study shifts attention to the upwards influence of local attempts to address implementation gaps, termed here as *street-level policy innovation*. Street-level policy innovation therefore goes beyond the common understanding of street-level innovation, which focuses on innovative implementation activities exercised by frontline workers (e.g., Arnold 2015; Keiser 2010; Maroulis 2017).

Street-level policy innovation refers to processes within which implementation adaptations that entail a single SLO’s efforts to address local implementation gaps with policy-clientele are later adopted as a formal policy change that is widely implemented.

Specifically, our analysis identified four phases which comprise street-level policy innovation: (1) Identifying implementation gaps while directly delivering policy to the local policy-clientele; (2) Design and local implementation of adaptation; (3) Accumulated evidence of the new implemented instrument effectiveness; and (4) Formal adoption of implementation adaptations as a policy innovation. Street-level policy innovation emerged as managed by the SLM, who is rather overlooked as a distinct category, although occupying a unique, structural position as overarchingly in charge of the street-level implementation of multiple policies to a local policy-clientele while being accountable for the outputs and outcomes of the SLO (Gassner & Gofen 2018). In the following sections, each phase will be elaborated and demonstrated through the case of the Free SideWalk Program.
Identifying Implementation Gaps: Unintended Consequences of Implementation

Analysis identified two unintended consequences, which were noticed by the SLO’s employees. One is that the direct interaction between frontline officials and citizen offenders often involves verbal quarrels, which were also noted during the observation sessions. Two managers explicitly referred to these interactions, for example, a member of the legal affairs unit exemplified: “I went to do a street operation [a manager mentioned] and they treated us with a hostility that you would not believe” (Interview LA1), and in a similar manner, the FLM generalized that “People try to make you fall into contradictions. It is important to have sensibility and tolerance; know how to work under pressure (...) Sometimes you meet citizens who feel frustrated and can express themselves inadequately” (Interview FOM.W1). The survey of frontline officials further supports these negative interactions, indicating that 35 percent prefer to avoid confrontation with law breakers, while discretion plays a key part in the implementation process. About half of the frontline official survey respondents declared that offenders are treated according to how offenders treat them. They usually penalize those who are aggressive, as one frontline official put it, “If they are aggressive, you give them a ticket” (Frontline official no.003-M).

An additional unintended consequence, divergence from directed rules, was described by a few of the managers as the frontline officials abusing their discretion for bribery, as suggested by one of them, who mentioned that, “such [frontline officials’] discretion is what provides them [frontline officials] the opportunity to receive or ask for money” (Interview GOM1). Describing a common interaction, he further revealed his opinion: “I’m going to fine you’ [the frontline official to an offender], ‘no, please give me a break’ [offender to a frontline official]. And then they [frontline official] hesitates filling out the ticket or they make a mistake [on the ticket] on purpose” (Interview GOM1). More generally, some managers considered that the imposition of fines had created higher incentives for corruption while cultivating the perception among the general public that fines only had the purpose of collecting...
revenues for the city government, as it was stipulated in the Income Law for the Municipality of Guadalajara (Jalisco Government, 2015). Discretionary power was nevertheless inevitable, particularly when frontline officials have to decide complicated situations, for example, when a person with a severe disability parks in a handicapped parking spot without the corresponding permit: “although agents would have to fine her in principle, they are corroborating her condition through their own eyes; so they usually let her use the parking space, but invite her to acquire her permit” (Interview FOM.W1). Interestingly, a response in the frontline official questionnaire further supported this possibility of divergence. When asked about the importance of having experience in the job, he answered “those with more experience belong to unions and are less strict [with the norm]” (Frontline official no.005-E).

In contrast with this approach, which referred to bribery practices as intentional, another approach emerged, referring to unintended consequences as human mistakes, as explained by one of the legal unit officials, “[implementing the policy] made operators [frontline officials] think that their work is measured by the number of tickets being placed instead of placing them correctly” (Interview LA1). According to the SLM, these mistakes led to ineffectiveness of the policy, because “when operators [frontline officials] make mistakes while filling out a ticket, citizens do not get the message [on the importance of the program] and further exhibit the SLO’s incompetence” (Interview SLM1.W1). As a result of these mistakes, the SLO needed to cancel between 600 to 800 tickets monthly during previous administrations: “with us [new administration], the maximum amount of cancelled tickets has reached 180” (Interview LA2).

**Design and Local Implementation of Adaptations**

Shifting from a punitive to an educational approach was supported by the realization of the SLO management that current policy instruments were insufficient to make people understand the
benefits of freeing sidewalks for the safety of pedestrians, while, as mentioned above, they were leading to undesired consequences. Moreover, this shift proposal was already publicly discussed and further established in a previous mayor’s party platform through a proposition to favor the right of way of pedestrians instead of vehicles (Party Platform, 2012), and the appointed SLM joined the government after being affiliated with an NGO in favor of urban sustainability, and envisaged the incorporation of an educational approach to deal with the sidewalk obstruction problem using warnings as a prior measure to the imposition of fines.

The decision to shift away from a purely punitive approach to a different, more educational approach, was begun by making a critical review of existing instruments such as the fines. According to the group interview, the preexisting fine format featured “a message to the citizen that the most important thing [for the government] was to levy taxes” (Interview FOM.W1). In addition, features in the format of the ticket, deemed as administrative vices by the SLO’s managers, increase chances of avoiding fines legally, meaning the possibility of gaming the system during the interaction between frontline official and citizen:

“the law give rights to citizen to appeal an administrative sanction up to three days after the sanction is given, but [due to the format] they [citizen in previous administration] where appealing tickets even after one or three years later, strange isn’t it? and in bunches of 20 or 30 tickets, which gives you an idea of something going on” (Interview LA2).

Therefore, after taking control of what was originally the SLO of the Public Parking Unit Department (later in 2017 formalized as the Mobility and Transportation Direction), the SLM reached the municipal ‘Coordination of Public Space Regulation’, another department within the local government, and with the support of the director of legal affairs, carried out a study on the legal basis of the fine ticket’s format. Critical legal faults were spotted in the format that
allowed cancellation of fines as mentioned before. According to the SLM, changing the format was not a difficult task, although it required the consultation and involvement of many other legal and public communication areas within the municipal government: “We had to make visible [the need for] this change within the administration, we had to prepare reports for them [to council members]” (Interview SLM1.W1).

The fine-tuning of tickets made other vices visible within the SLO’s preexisting procedures. The supervision of parking meters, which, according to Parking Regulation Act (Municipal Gazzette, 2003) was a legal jurisdiction of the SLO, was completely outsourced to a private company called MetroMeters. This jurisdiction, however, represented only one of many other parking supervisions that the local government was systematically neglecting in terms of parking regulations. “We needed that [frontline officials’] experience in social reengineering, therefore we needed to relaunch the SLO’s activities and separate them [frontline officials in the eyes of the citizens from MetroMeters agents], and accompany them with the FSWP [a different name tag]” (Interview SLM1.W1) “…the uniform is different” (Interview CO).

As part of the innovations made in the SLO, warning notices were among the next things introduced to make citizens more aware of the changes “to first make warnings before fines so people could know the new measures this administration is going to take” (Interview GOM1). Warning served as “test before making a fine” (Interview FOM1.W1). SLM discretion plays an important role in the SLO makeover however, “the authority [government] has the legal authority to provide a warning before a sanction” (Interview LA1). Warnings until then; however, these were underexploited until that point in time. During the group interview in 2016, managers role played about citizens’ initial reactions to warnings, where, according to them, it provided an opportunity to give citizens a different message:
“[An offender says] ‘why did you fine me,’ [a manager responds] ‘where does it say that there is a fine?’ people do not read and so that gave us an opportunity to offer a message [with respect to the law violation] ‘do you know what you did?’ so once the citizen has been lectured we tell them that such ticket is not a fine but a warning [citizen are then relieved]’” (Interview LA).

Such an educational approach made people leave the SLO office and spread the word “next time I do this [law violation], then I will be fined” (Interview CO). The idea of warnings as an educational mechanism to change the longstanding punitive strategy emerged between September and October 2015 during several meetings held by members from both incoming administrations in the Guadalajara and Zapopan city governments (Interview GM2). Without having to change any municipal regulations, which would have required the approval of the city council, the SLM in charge of the FSWP opted to make further adaptations in order to shift from a punitive to an educational approach. Zapopan’s government followed Guadalajara’s lead a year later, introducing warning notices, which temporarily replaced fines (Interview GOM2).

Additional changes in the implementation arrangements throughout 2015 and 2016 further advanced an educational approach, such as hiring people in wheelchairs as frontline officials of the FSWP, which took place at the end of 2015 as part of the effort to increase drivers’ awareness to the risks that disabled people face with the obstruction of sidewalks (El Informador, 2015). In addition, the SLO as part of the FSWP started an educational course named Educavial, which was designed to sensitize citizens to pedestrian safety, with participation offered to offenders in exchange for eligibility for a substantial discount in their penalties (Guadalajara Press Release, 2016a). Importantly, whereas replacing fines with warnings did not require any official approval from higher-up management, these adaptations did require the approval of the city council due to their budgetary implications (Municipal Gazzette, 2018).
Accumulated Evidence of the New Implemented Instrument Effectiveness

Two expectations fulfill the underlying rationale of warning notices, which provided drivers a non-punitive and educational way to change their behavior: fostering a more positive interaction between frontline officials and offenders and developing a better understanding among the public of the negative consequences of obstructing the city sidewalks. Both these expectations were later indeed achieved. Specifically, this adaptation of the implementation arrangements successfully changed the nature of the interaction between frontline officials and drivers; it drastically reduced its hostility, as stated by one of the program’s frontline managers: “warnings are kind of a preparation before the imposition of fines, which produces a very drastic reaction among people (...) When receiving a warning notice, a driver might get confused at first, but later the agent [frontline official] has leeway to calm them down and explain that it does not produce a charge, but only a cautionary notice” (Interview FOM.W1).

Although 85 percent of the frontline officials believed that fines were more effective in preventing the obstruction of sidewalks, 65 percent of them agreed that warnings are more instructive than fines. A frontline manager acknowledged, “when you impose a fine, people develop barriers that prevent them from understanding the benefits of the program” (Interview FOM.W1). All frontline officials surveyed reported that offenders appreciated their attempt to talk with them instead of charging them a fine. Warnings were deemed useful in their repertoire of intervention, since they could avoid the use of fines without violating the program’s objectives.

Formal Adoption of Implementation Adaptations as a Policy Innovation

The idea of warning notices as an educational mechanism to change the longstanding punitive strategy, according to the interview with the SLM of Zapopan’s SLO (SLM2), emerged between September and October 2015 during several discussion meetings held by members from both
incoming administrations in the Guadalajara and the Zapopan city governments. Therefore, and without having to change any municipal regulation, which would have required the approval of the city council, the SLM in charge of the FSWP in Guadalajara opted to make further adaptations in order to shift from a punitive to an educational approach. Zapopan’s government followed Guadalajara’s lead years later “the mobility, transit and security act was approved in 2017, which provides the legal bases for [Zapopan’s] FSWP” (Interview GOM2). Following the success of the adaptation, the mayor of Guadalajara participated in the field as a FSWP operator, and such actions were quickly spotted by the local media, so that the FSWP became officially a flagship program of the incoming government of Guadalajara (Milenio, 2015). Later, in May of 2016, the FSWP became celebrated for its success by the Rockefeller Foundation, which included Guadalajara in its list of “most resilient cities of the world”, partly as a result of its urban mobility policy innovations (Guadalajara Press Release, May 2016b). These innovations were giving precedence to pedestrians in the use of public spaces and urban infrastructure, granting people, particularly those with any type of vulnerability, universal access to transportation services, and favoring the use of public transportation and non-motorized vehicles over private cars (Municipal Gazzette 2017a).

By mid July 2016, the city council of Guadalajara enacted a new statute restoring municipal authority to control urban mobility, a policy competence that the municipal government had yielded several decades before to the state level government. This policy change included replacing the Parking Regulation Act issued in 2003, which restrained the municipal government’s authority to the supervision of public and private parking spaces, to a new regulatory framework called the Integral Management Act, where the government of Guadalajara acquires the power to manage an ample variety of mobility issues, such as road safety, transportation of persons using motorized and non-motorized vehicles, sidewalk quality...
standards, and the norms of conduct that drivers should follow in their interaction with pedestrians and with other vehicles (Municipal Gazzette, 2016). The new regulatory framework provided the legal basis for the authority of the Mobility and Transportation Direction, previously the Public Parking Unit Department. This new municipal organization is now responsible for the design and implementation of different public transportation plans and strategies and oversees the development of mobility infrastructure along with many other competences that were completely absent in previous regulations (Municipal Gazette 2017b).

In sum, in contrast to the typical trend in Mexico, where most policies end as soon as the incumbent government is replaced (Meza, 2017), the FSWP has continued its operations, transcending government administrations. Furthermore, the municipality of Zapopan has not only closely followed Guadalajara’s lead in terms of the FSWP (see Zapopan’s main website)¹ but, more importantly, both municipal governments had established inter-municipal cooperation to enforce these policies jointly. Eduvial provides a certificate valid in both municipalities. Also, these municipalities have developed an electronic citizen report application where people can inform authorities about different types of incidents, including the obstruction of sidewalks by wrongly parked vehicles, which has been a useful instrument to reduce the enforcement costs of the program (see ciudapp.mx). Furthermore, according to interviews made with current officials of the SLO in Zapopan (SLM2 and GOM2), in other Mexican cities in the north, such as San Pedro Garza, one of the most affluent municipalities in Mexico, have approached the design team with the aim of replicating the program elsewhere.

Conclusions

Drawing on the Free SideWalk program implementation in Guadalajara, Mexico, our analysis demonstrates how a formal adoption of a new policy instrument follows one SLO’s attempts to address local implementation gaps, termed here *street-level policy innovation*. Shifting the focus to *street-level policy innovation*, this study suggests a threefold contribution. First, current street-level scholarship emphasizes the role of SLOs is not just the well-documented endeavors to deliver policies, to mediate policies, and to mediate politics (Brodkin 2013; Hogett 2006; Lynn, Heinrich, and Hill 2001; Smith 2012). Street-level policy innovation emphasizes that SLOs play an additional role: serving as a source for policy innovation by exploring, experiencing, and experimenting with new policy instruments, while producing concrete evidence as per the effectiveness of the new instrument.

Second, attempts of adjusting practical delivery efforts “to the dynamism, unexpectedness, and ever changing “routines” of street level work” (Gassner & Gofen, 2018; see also Lipsky, 1980; May, 2012; Maynard-Moody & Portillo, 2010), namely, adaptation of implementation, is inherent to policy implementation (Bardach, 1977). Mostly considering what influences implementation adaptations and their implications for policy outcomes, the adaptation of implementation is well-documented from a *downward* perspective. Moreover, adaptation of implementation is a well-established *downward* managerial implementation function of middle management (e.g., Carey & Matthews, 2017; Hjern & Porter, 1981). Allowing a better understanding on the upwards influence of implementation adaptations, street-level policy innovation uncovers a potential *upwards* influence of implementation adaptations, which is understudied. As an upwards influence, street-level policy innovation also emphasizes that the upwards managerial functions of middle management may go beyond its common portrayal as voice, comprising of “championing” alternatives and “synthesizing” information (Floyd &
Wooldridge, 1992). Rather, middle management upwards influence may entail setting an example and providing on the ground evidence for a policy innovation.

Lastly, street-level policy innovation further emphasizes the key, yet understudied role of street-level management, who are first to identify implementation gaps that are relevant to the local clientele served by the SLO, and to have the capability to address these gaps (Gassner & Gofen, 2018). Indeed, numerous studies focus on direct-delivery interactions in SLOs, whereas SLOs’ management is understudied. Indeed, it has been recently argued that “if the public wants to affect public service policy delivery, it must look not to the behavior of individual workers but to managers and policy makers” (Lipsky 2010, 212, our emphasis; see also, Hupe & Buffat, 2014; Meier, 2009). Comparable suggestions have claimed that public management studies may contribute to the research of policy implementation, while addressing implementation through administrative systems as a “missing link” in policy research (Barrett, 2004; Brodkin, 2012; Lynn, Heinrich & Hill, 2000; Robichau & Lynn, 2009; Winter, 2012).

To better understand street-level policy innovation, further research is required, for example, in additional policy sectors. Further research is also required to better understand under what conditions local adaptations to address implementation gaps evolve into formal policy change.
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Appendix A: Non-participant structured observation.

Objective: To know the process of operation of the program (infractions and warnings).

Relative to the routes (How are the routes)

- What are the schedules?
- What is the duration per operator (average)?
- How many streets and/or blocks does an operator cover?
- How are the routes determined?
- Are there logbooks of the routes and, if so, what information is collected?

Relating to operators (Details about their work)

- Do the operators go alone or accompanied? If accompanied, what accompaniment do they have?
- What equipment do they generally use to carry out their work?
- Do they take pictures?
- How does the interaction with offenders occur when the infraction is detected?
- How do they decide to proceed in each case, especially in the case of "gray areas" that require interpretation and assessment?
- When a ticket versus a warning is issued?

Relative to information:

Please do not cite
• How the operators report the information of each case at the end of their journey.

• How the collection and recording of the information is carried out.

• To what use is the information put?

• How many people participate in the management of information?

• What equipment do they have to process and organize the information?

• What happens when the tickets of infraction or warnings are illegible?

Appendix B: Semi-structured open-ended interviews

<table>
<thead>
<tr>
<th>Management level</th>
<th>Position</th>
<th>Key</th>
<th>City</th>
<th>Wave</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street-level manager</td>
<td>FSWP General Manager</td>
<td>SLM1 (.W1 or .W2 depending on the wave)</td>
<td>Guadalajara</td>
<td>1st &amp; 2nd</td>
</tr>
<tr>
<td>Mid-level manager</td>
<td>FSWP General Operation Manager</td>
<td>GOM1</td>
<td>Guadalajara</td>
<td>1st</td>
</tr>
<tr>
<td>Mid-level manager</td>
<td>FSWP Communication Officer</td>
<td>CO (.W1 or .W2 depending on the wave)</td>
<td>Guadalajara</td>
<td>1st &amp; 2nd</td>
</tr>
<tr>
<td>Mid-level manager</td>
<td>FSWP Legal Affairs</td>
<td>LA1</td>
<td>Guadalajara</td>
<td>1st</td>
</tr>
<tr>
<td>Mid-level manager</td>
<td>FSWP Legal Affairs</td>
<td>LA2</td>
<td>Guadalajara</td>
<td>1st</td>
</tr>
<tr>
<td>First-line manager</td>
<td>FSWP Field Operation Manager</td>
<td>FOM (.W1 or .W2 depending on the wave)</td>
<td>Guadalajara</td>
<td>1st &amp; 2nd</td>
</tr>
<tr>
<td>Street-level manager</td>
<td>FSWP General Manager</td>
<td>SLM2</td>
<td>Zapopan</td>
<td>2nd</td>
</tr>
<tr>
<td>Mid-level manager</td>
<td>FSWP General Operation Manager</td>
<td>GOM2</td>
<td>Zapopan</td>
<td>2nd</td>
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Appendix C: List of semi-structured interviews with frontline officers

<table>
<thead>
<tr>
<th>id</th>
<th>sex</th>
<th>age</th>
<th>time working in FSWP (months)</th>
<th>opinion about what is more effective</th>
<th>meetings reported with management (freq)</th>
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<tr>
<td>001-E</td>
<td>male</td>
<td>55</td>
<td>7</td>
<td>none</td>
<td>daily</td>
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<tr>
<td>002-E</td>
<td>male</td>
<td>40</td>
<td>4</td>
<td>Both</td>
<td>daily</td>
</tr>
<tr>
<td>003-E</td>
<td>male</td>
<td>22</td>
<td>4</td>
<td>fines</td>
<td>daily</td>
</tr>
<tr>
<td>004-E</td>
<td>male</td>
<td>27</td>
<td>4</td>
<td>fines</td>
<td>weekly</td>
</tr>
<tr>
<td>005-E</td>
<td>female</td>
<td>24</td>
<td>4</td>
<td>fines</td>
<td>daily</td>
</tr>
<tr>
<td>001-M</td>
<td>male</td>
<td>48</td>
<td>7</td>
<td>fines</td>
<td>daily</td>
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<tr>
<td>002-M</td>
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<td>45</td>
<td>7</td>
<td>fines</td>
<td>daily</td>
</tr>
<tr>
<td>003-M</td>
<td>male</td>
<td>42</td>
<td>7</td>
<td>fines</td>
<td>daily</td>
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<td>004-M</td>
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<td>fines</td>
<td>daily</td>
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<td>53</td>
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<td>fines</td>
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<tr>
<td>001-J</td>
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<td>27</td>
<td>7</td>
<td>fines</td>
<td>daily</td>
</tr>
<tr>
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<td>29</td>
<td>7</td>
<td>both</td>
<td>daily</td>
</tr>
<tr>
<td>003-J</td>
<td>male</td>
<td>37</td>
<td>4</td>
<td>fines</td>
<td>indefinite</td>
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<tr>
<td>004-J</td>
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<td>30</td>
<td>4</td>
<td>fines</td>
<td>daily</td>
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<td>---</td>
<td></td>
</tr>
<tr>
<td>005-J</td>
<td>male</td>
<td>42</td>
<td>7</td>
<td>fines</td>
<td>almost daily</td>
</tr>
<tr>
<td>001-G</td>
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<td>34</td>
<td>7</td>
<td>fines</td>
<td>indefinite</td>
</tr>
<tr>
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<td>male</td>
<td>45</td>
<td>5</td>
<td>fines</td>
<td>indefinite</td>
</tr>
<tr>
<td>003-G</td>
<td>male</td>
<td>46</td>
<td>4</td>
<td>fines</td>
<td>weekly</td>
</tr>
<tr>
<td>004-G</td>
<td>male</td>
<td>47</td>
<td>8</td>
<td>fines</td>
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<tr>
<td>005-G</td>
<td>male</td>
<td>20</td>
<td>4</td>
<td>fines</td>
<td>daily</td>
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</table>