

# **Strategic Communication by Regulatory Agencies as a Form of Reputation Management: Findings, Critiques, and Response \***

Moshe Maor  
Department of Political Science  
Hebrew University of Jerusalem

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## **Abstract**

This paper takes stock of studies that focus on regulatory agencies' deliberate use of strategic communications as a form of reputation management, discussing the critiques that have recently surfaced and responding to them. To shed light on these issues, the paper begins by defining core concepts and briefly reviewing the major findings in this field, paying particular attention to regulatory agencies' decisions concerning whether and how to communicate. It thereafter delves into the critiques of this research stream, which center on two aspects: (i) the claim that an agency's communication choices are to some extent driven by the distinctive logic of the media rather than by reputational concerns, and (ii) the argument that strategic communication provides only short-term solutions to emerging threats and is therefore overemphasized in the literature. The paper responds to these criticisms and concludes by identifying unanswered questions that can inspire and guide future research.

*Keywords:* bureaucratic reputation; regulatory agencies; strategic communication; audiences; prioritizing

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What is strategic communication? What does it mean for regulatory agencies to pursue strategic communication as a form of reputation management? How does this sustain, create, or destroy value, or affect the chances of pursuing particular opportunities? Over the last decade, the answers to these questions have become increasingly important for scholars and practitioners seeking to understand the creation, management, and role that bureaucratic reputation plays in the life of regulatory agencies. A substantial reason for this lies in the growing complexity of risk regulation, which nowadays includes a wider array of actors, institutions, processes, and interests, in the contexts of knowledge society and blame culture that have increased agencies' concerns with reputational risk. This change is also accompanied by audience fragmentation, the proliferation of information channels and new technologies, and the shifting economic foundations of the news business, which have led to a situation in which dominant news narratives are increasingly advanced by those with power (McChesney and Pickard 2017). Yet, despite growing interest in the reputation and legitimacy of regulatory agencies, only a handful of studies have explored these questions.

At the same time, the answers to the aforementioned questions have also become increasingly problematic for those trying to comprehend the dynamics of bureaucratic reputation. One challenge centers on the notion of 'prioritizing' (Maor 2015, 32) among the four dimensions of agency reputation, namely, the performative (does the agency do its job?), moral (does the agency protect the interests of its clients?), technical (does the agency have the skills and capacity required?), and procedural (does the agency follow accepted rules and norms?). Some have claimed that the ways in which regulatory agencies prioritize multiple (and potentially conflicting) expectations among audiences regarding different dimensions of their

reputations may be driven to a certain extent by the distinctive logic of the media (Boon et al. 2019, 172). This critique somewhat challenges the claim according to which prioritization is driven by agencies' assessments of the relative strength of different dimensions of their reputation that are subject to threats, or by the nature of their task (e.g., Gilad, Maor, and Ben-Nun Bloom 2013; Maor 2015). This critique also questions the rationality that is often assumed to be part of the prioritization process, weakening the premise underlying the bureaucratic reputation approach.

Another challenge centers on the notion that (strategic) communication provides solely short-term, symbolic solutions to emerging threats (Gruing 1993). This is because “[o]ver the short term, [...] public relations practitioners can set objectives for communication programs to improve symbolic relationships with publics. Over the long term, however, public relations should examine behavioral relationships with publics—relationships that directly affect the behavior of the organization—its ability to accomplish organizational goals” (Gruing 1993, 124). This criticism corresponds with the view that an agency's communication is overemphasized in the literature (Picci 2015, 49) and that media policy can deal solely with short-term reputational threats (Schanin 2015).

This paper takes stock of studies that focus on regulatory agencies' deliberate use of strategic communications as a form of reputation management, discussing the critiques that have recently surfaced and responding to them. To bring clarity to these issues, the paper begins by defining the core concepts and briefly reviewing the major findings, paying particular attention to regulatory agencies' decisions regarding whether and how to communicate. It thereafter delves into the aforementioned critiques of this stream of research. The paper responds to these criticisms and

concludes by identifying unanswered questions that can inspire and guide future research.

### **Core Concepts**

A growing literature focuses on the concept of bureaucratic reputation, which is defined as “a set of symbolic beliefs about the unique or separable capacities, roles, and obligations of an organization, where these beliefs are embedded in audience networks” (Carpenter 2010a, 45). This definition centers on the premises that an agency’s behavior is explained by (i) interactions with the broader environment, rather than merely via the relationship with political superiors (Maor 2015), and (ii) the evaluation of the organization’s unique character and activities by multiple audiences (Carpenter 2010a). Evaluation of the organization’s unique character and activities is based on past experiences with, and attitudes to, observations and perceptions of, the organization’s ability to provide unique services capably. Reputation uniqueness, according to Carpenter (2001, 5), refers to agencies’ ability to demonstrate that they can create solutions (e.g., expertise, efficiency) and provide services (e.g., moral protection) that no other agency in the polity offers. Bureaucratic reputations derive from individuals’ perceptions, which aggregate into shared understandings among members of a particular audience or multiple ones. A bureaucratic reputation is therefore a property that is attached to a specific government agency, has an independent ontological basis that audience members may share, and can be experienced, observed, measured, valued, and influenced (Fombrun 2012, 102). However, “[...] what audiences see is not the perfectly tuned or visible reality of the agency” (Carpenter and Krause 2012, 27). Rather, it is an image that embeds considerable uncertainty and ambiguity (Gioia, Schultz, and Corley 2000)

regarding the agency's performance, the expertise of its staff, its values, and the legality of its actions (Carpenter 2010a). "Complex public organizations are seen 'through a glass but dimly' by their manifold audiences" (Carpenter and Krause 2012, 27).

As an indispensable part of modern democratic life, the mass media plays a key role in channeling, and sometimes even structuring, the interactions between agencies and audiences. Specifically, the media assumes a key role as the most important source of information for citizens about government performance (Arnold 2004). In reputational terms, the media provides: channels through which regulatory agencies signal their reputation uniqueness to their manifold audiences and observe the subsequent feedback from these and/or other audiences; informal forums for political accountability (Bovens 2007); and "audiences in their own right and [the] institutional intermediaries used by other audiences—and the agencies themselves—to make sense of agency performance" (Boon et al. 2019, 173). The media also activates (and deactivates) accountability forums and induces (and suppresses) formal accountability processes (Jacobs and Schillemans 2016).

In a saturated media environment, agencies identify, process, and prioritize the multiple (and potentially conflicting) expectations among various audiences concerning different dimensions of their reputations. They do so by more or less rationally choosing which dimension to stress vis-a-vis specific audiences. This process is referred to in the literature as *prioritizing* (Maor 2015, 32), and it is undertaken simultaneously by all actors in the reputation game. Agencies prioritize between dimensions of reputation (e.g., Carpenter 2002), areas of functioning (e.g., Maor, Gilad, and Ben-Nun Bloom 2013; Moschella and Pinto 2018), and audiences (Maor 2015, 20-21; Busuioc and Lodge 2017). Audiences prioritize between agencies

of interest as well as dimensions of reputation (Maor 2015, 20; Teodoro and Seung-Ho 2018). Individual civil servants working in agencies prioritize between dimensions of reputation (Kolltveit, Karlsen, and Askim 2019). Political executives prioritize between different reputation-protection mechanisms employed by the agencies they control (Maor 2007). And the media prioritizes between agencies of interest, and between reputational dimensions of organizations with a positive/negative reputational history (Boon et al. 2019).

If reputations are successfully formed, cultivated, and managed, they become “[...] valuable political assets – they can be used to generate public support, to achieve delegated autonomy and discretion from politicians, to protect the agency from political attack, and to recruit and retain valued employees” (Carpenter 2002, 491). Because strong reputations are powerful assets for agencies and are, in fact, equivalent to agency coalition building (Carpenter 2001, 22), many incentives exist in order to protect them. “There are other things that bureaucracies protect and ‘maximize’, but for many agencies [...], reputation protection serves as the simplest and most powerful dynamic governing their behavior” (Carpenter 2004, 54). Much of the political science research on reputation has therefore been motivated by the idea that “[...] when trying to account for a regulator’s behavior, *look at the audience*, and *look at the threats*” (Carpenter 2010b, 832; *italics in original*). Here, a reputational perspective argues that agency reputation-management strategies vary depending on the degree of reputational threats originating from the array of conflicting audience assessments concerning an agency’s outputs, processes, and behavior (Carpenter 2010a; Maor, Gilad and Ben-Nun Bloom 2013). Potential sources of these threats in risk regulation regimes (Hood, Rothstein, and Baldwin 2001; Rothstein 2003; Rothstein, Borraz, and Huber 2012) include a gap between an agency’s policy

performance and reputation, weak organizational performance (e.g., a lack of coordination among the agency's subunits), and changing audience expectations regarding the agency or the sector within which it operates.

The notion of reputational risk is therefore one of the cornerstones of this body of research (e.g., Carpenter 2001, 2002, 2004, 2010a; Carpenter and Krause 2012, 2015; Gilad and Yogev 2012; Krause and Douglas 2005; Krause and Corder 2007; Maor 2007, 2010, 2011; 2015; Moffitt 2010, 2014; Moynihan 2012; Whitford 2002, 2003; Wæraas and Maor 2015). Recent findings have indeed related the ramifications of reputational concerns on the way agencies approve some drugs more quickly than others (Carpenter 2002) and allocate resources across tasks (Gilad 2012), on organizational task prioritization (Gilad 2015), endogenous construction of jurisdictions (Maor 2010), the observability of decisions and errors (Maor 2011), the duration of enforcement decisions (Maor and Sulitzeanu-Kenan 2013), the agency's policy, regulatory, and scientific outputs (Krause and Douglas 2005; Maor and Sulitzeanu-Kenan 2015; Rimkuté 2018), inter-agency cooperation behavior (Busuioc 2016), regulatory enforcement (Etienne 2015; Gilad and Yogev 2012), the provision of public advice (Moffitt 2010, 2014), and accountability relations and behavior (Busuioc and Lodge 2015; Christensen and Lodge 2018).

A few studies, which are at the heart of this chapter, have also demonstrated the extent and ways in which regulatory agencies manage their reputations through the strategic use of communication (e.g., Abolafia and Hatmaker 2013; Busuioc and Rimkuté 2019a; Gilad, Maor, and Ben-Nun Bloom 2013; Maor, Gilad, and Ben-Nun Bloom 2013; Moschella and Pinto 2018; Schanin 2015). In addition, reputation-based accounts have been used to explain how reputation and blame avoidance might deteriorate network performance (Moynihan 2012), and how agencies protect their

reputation in times of crisis (Carpenter 2010b; Christensen and Laegreid 2015; Bækkeskov 2017; Bach et al. 2019; Mochella and Pinto 2018). The theory's assumptions have been tested with regard to agencies in the U.S. (Carpenter 2010a, 2010b; Maor 2010, 2011; Maor and Sulitzeanu-Kenan 2013; Moffitt 2010, 2014; Moschella and Pinto 2018; Abolafia and Hatmaker 2013), Australia, New Zealand and the province of British Columbia, Canada (Maor and Sulitzeanu-Kenan 2015; Maor 2007), Israel (Gilad, Maor, and Ben-Nun Bloom 2013; Schanin 2015; Gilad, Alon-Barkat, and Braverman 2016; Maor, Gilad, and Ben-Nun Bloom 2013), Ireland (O'Dwyer 2015), Germany, Belgium, Denmark, and Norway (Verhoest, Rommel, and Boon 2015; Bach et al. 2019; Boon et al. 2019; Kollveit, Karlsen, and Askim 2019; Kollveit 2019), as well as the EU (Busuioc 2016; Busuioc and Rimkutė 2019a; 2019b; Rimkutė 2018, 2019; van der Veer and Haverland 2018).

In addition, attempts to develop standardized measures of bureaucratic reputation (Lee and Van Ryzin 2019) and to gauge bureaucratic reputation in the eyes of citizens (Lee and Van Ryzin 2018) were undertaken in the context of US federal agencies. Studies have also found that reputational considerations influence decision making within regulatory agencies (Bach 2015) and that reputational signals affect the response of employees (Gilad, Ben-Nun Bloom, and Aassouline 2018). The bureaucratic reputation approach therefore brings to the fore assessments by multiple audiences concerning agencies' past behavior as well as the way agencies communicate this behavior; the perception, processing, and prioritizing of this information by reputation-sensitive agencies according to the degree of reputational threats they pose; and the response of these agencies to such reputational threats. We now turn our attention to key findings regarding these responses in the media arena.



## Research Findings

If there is an overarching thread linking research in this area, it is comprised of the notions that a reputation-sensitive agency hears, sees, and feels the public; that in some functional areas the agency feels comfortable because it possesses a strong reputation, whereas in others it does not; and that in its response to reputational threats, an agency's external communication can broadly assume many forms. By describing communication of a reputation-sensitive agency as *strategic*, attention is centered on deliberate strategies that seek to shape an agency's reputation in different situations and contexts, with a role for choice about the organization, planning, initiation, maintenance, and termination of the agency's communication activities (for alternative definitions and approaches, see Fredriksson and Pallas 2016, 154; Whittington and Yakis-Douglas 2012, 404; Hallahan et al. 2007, 7; Heide et al. 2018). Strategic communication activities by regulatory agencies range from strategic silence to regulatory talk. The former is a passive *blame-avoidance strategy* (Hood 2011; see also Hinterleitner and Sager 2015, 2017, 2019) intended to avoid attention. However, its occurrence should be carefully gauged because agencies may be subject to political pressures to keep silent.

Regulatory talk ranges from an active blame-avoidance strategy (Hood et al. 2009), by engaging in problem denial, problem admission, and responsibility denial, or admission, to a deliberate *credit-claiming strategy* (Hood 2011; Highhouse, Brooks, and Gregarus 2009; Neu, Warsame, and Pedwell 1998) that is intended to communicate favorable information about the agency's activities and outputs (Gilad, Alon-Barkat, and Braverman 2016, 373). Gilad, Alon-Barkat, and Braverman (2016), for example, detail how, in response to the 2011 social protest in Israel, public organizations tended to employ a "positive-visibility" strategy involving the

communication of favorable information regarding the agency, whereas businesses were inclined to avoid blame by maintaining a “low public profile.”

Focusing on the Israeli banking regulator’s responses to public expressions of opinion, research on strategic silence has established that a regulatory agency tends to keep silent on issues regarding which it generally enjoys a strong reputation, and on issues that lie outside its distinct jurisdiction, while responding to opinions about core functional areas with regard to which its reputation is weaker and areas wherein its reputation is still evolving (Maor, Gilad and Ben-Nun Bloom 2013). This implies that an agency’s assessment of the relative threat to its reputation results in *selective* communication strategies (i.e., a choice between levels of a particular type of response) across functional areas. Similarly, Schanin (2015) has demonstrated how the Banking Supervision Department at the Bank of Israel responded to criticism directed at it to a greater extent after the aforementioned social protest than it did beforehand. However, this may have been an indirect result of the decrease in the department’s public salience and not directly due to the protest itself.

These findings are important because they demonstrate how an organization’s assessment of the relative threat to its reputation influences its communicative strategy *across functional areas*. The choice between silence and talk emphasizes the agency’s attempt to actively construct how multiple audiences, which may hold conflicting views and apply different assessment criteria, judge its performance. It also highlights the possibility that strategic silence may be employed in order to minimize the association of the regulatory agency with actual as well as potential reputational threats (Ehrmann and Fratzscher 2009; Heugens et al. 2004). Striking a fine balance between strategic silence and talk is a very complex task, as is the task of maintaining silence. It requires a centralization of external communication,

formulation of blackout guidelines, the creation of an incentive structure to enhance compliance with these guidelines, and the establishment of enforcement mechanisms to ensure that none of the organization's employees break these guidelines and, if required, to penalize deviant behavior (Maor 2016a). Alternatively, strategic silence may be accomplished through transformational leadership behaviors where leaders succeed in aligning employees' goals with the vision and mission of the agency.

The aforementioned variations in how agencies manage the expectations of their multifaceted audiences across functional areas is also evidenced by the analysis of a corpus of speeches given by the members of the Board of Governors of the Federal Reserve between 2006 and 2016 (Moschella and Pinto 2018). This analysis demonstrates that when concerns about policy reversibility are higher, the Federal Reserve is more likely to focus on the issues of credit easing and systemic financial regulation, where its reputation is weak or not yet established. In contrast, issues related to economic activity and inflation, regarding both of which the Federal Reserve's reputation is established, are likely to become less salient. A similar pattern of issue attention has been observed when the Federal Reserve addressed political audiences compared to other audiences.

In an attempt to further uncover the variation in how agencies manage the expectations of multiple audiences, Busuioc and Lodge (2016: 95) distinguished between 'core' and 'noncore' reputational concerns. Drawing on Carpenter (2010), the performative, moral, technical, and procedural elements are said to define the core competency of the agency, the agency identity (i.e., what managers see as its distinguishing characteristics; Albert and Whetten 1985; Dutton and Dukerish 1991) and what the agency 'want[s] to be known for' (Busuioc and Lodge, 2016, 93). According to Busuioc and Lodge (2016), how agencies respond to external criticism

is shaped by the agency's understanding of its core reputation and associated reputational threats. This distinction has been employed in an attempt to gauge how the communication of different aspects of organizational reputation vary over time and across EU agencies (Busuioc and Rimkuté 2019a). Based on a quantitative analysis of EU regulatory agencies' annual reports over time, scholars found that EU agencies predominantly focus on the technical dimension; that these agencies engage least with the moral dimension, indeed, this remains the least pronounced dimension for all agencies; and that agencies' original focus on technical reputation is replaced by a broader reputation outlook (Busuioc and Rimkuté 2019a, 19). A study of all EU agencies furthermore reveals that regulatory agencies utilize a more diverse set of reputational strategies by emphasizing the technical, procedural, and moral reputations more than non-regulatory agencies, whereas social-policy agencies foster their technical reputation more than economic-policy agencies (Rimkuté 2019).

Equally important is the question of regulatory talk, especially the determinants of this type of strategic communication. Based on the Israeli banking regulator's nuanced responses to public expressions of opinion between 1996 and 2012, Gilad, Maor, and Ben-Nun Bloom (2013) found that a regulatory agency has greater propensity to acknowledge problems, yet mostly shifts blame to others when faced with claims that regulation is overly lenient (namely, underregulation), and to deny allegations that regulation is excessive. These findings highlight the agency's *differential* response (i.e., a choice between types of responses) to particular reputational threats. The rationale is clearly straightforward: “[C]laims of underregulation pose a greater threat to regulatory reputation because they imply agency failure to accomplish its distinct core mandate for protecting a specific public value [...]” (Gilad, Maor, and Ben-Nun Bloom 2013, 452). The findings therefore

imply that external audiences may be able to shape agency attention and trigger different agency responses by “carefully choosing how to frame their allegations—for example, as a problem of overregulation versus underregulation” (Gilad, Maor, and Ben-Nun Bloom 2013, 3).

Between strategic silence and talk, one can detect strategic communication practices. These are associated with fine-tuning regulatory signals, which are rationalized by the idea that a change in communication strategy from silence to ‘strategic transparency’ (Abolafia and Hatmaker 2013, 541–543; Krippner 2007) may derive from a regulator’s wish to increase the perceived predictability of its policy in order to govern more effectively the behavior of its regulatees (see also Puppis et al. 2014). This line of argument corresponds to the claim that communication can also be conceptualized as an instrument of industry regulation (Black 2002; Majone 1997; Yeung 2005), which occurs alongside communication activities intended to increase agencies’ accountability via presentational management (Yeung 2005; Puppis et al. 2014).

A classic example of fine-tuning practices is found in Abolafia and Hatmaker’s (2013) study, which relied on verbatim transcripts of the meetings at the Federal Reserve to explore the practices employed by policymakers to store up trust, anticipate threats, and rationalize failure to stakeholders. Fine-tuning is defined as “the strategic practices involved in signal construction intended to shape stakeholders’ estimation of any agency’s ability and intentions” (Abolafia and Hatmaker 2013, 533). It is therefore a means to actively seek legitimacy (Suchman 1995, 574) and reflects “a source of deep engagement for the signaler” (Abolafia and Hatmaker 2013, 535). Such signals—the clarity of which varies strategically from transparency to opacity according to political and economic circumstances—were used by the Federal

Reserve to influence immediate stakeholder behavior as well as to maintain longer-term agency reputation. Abolafia and Hatmaker (2013) identify two fine-tuning practices, *expectation modulation* and *credibility filtering*. The former practice is employed by the agency in order to shape audiences' expectations about the agency's actions; the latter in an attempt to screen the signal for positive reputational effects. Both practices are part of the toolkit used by the signalers and are grounded in an agency's sense of its image and identity (Abolafia and Hatmaker 2013).

In acknowledging the intensity of reputation management through the strategic use of communication, and, in particular, the complex dilemma faced by the agency regarding whether to acknowledge problems, these studies have addressed the issue of taking agency communication with the public beyond saccharine public statements and progressing to spaces wherein reputational dilemmas can be classified, analyzed, and faced (Maor 2015). These studies not only demonstrate the interactive nature of the relations between the agency and the public but also that the agency is not acting in an ad hoc manner. Rather, the agency carefully designs its interaction with regulatees and the public at large, shaping the 'common ground' that it shares with its critics. Although it remains attuned to the public's feelings and intuitions, it selectively or differentially responds in a way that maintains its credibility.

### **Critiques and Response**

Criticisms are directed at strategic communication as a form of reputation management. Boon et al. (2019), for example, articulate two problematic aspects in bureaucratic reputation theory into a coherent critique. First is the premise of rationality, which is often assumed to be part of the prioritization process undertaken by agencies among the expectations of multiple, and potentially conflicting, audiences

regarding different components of their reputations. Second is the claim that the bureaucratic reputation theory treats the role of the media as a black box. Combining these two problematic aspects enables the authors to articulate the argument according to which the aforementioned process, referred to as ‘prioritizing’ (Maor 2015), may be driven to some extent by the distinctive logic of the media rather than by agencies’ assessments of the relative strength of different dimensions of their reputation that are subject to threats, or by the nature of their task. This criticism draws on the burgeoning literature concerning media logic (e.g., Altheide 2004), raising the possibility that the way the media works might interfere with the reputation signals agencies seek to communicate (Boon et al. 2019; Boon, Salomonsen and Verhoest 2018). In other words, a long-term journalistic slant (e.g., Fox News) and regulatee-sponsored communication (e.g., FDA-bashing) can have effects that are significant enough to sway audiences’ expectations, and perhaps even regulation outcomes. Regardless of whether media logic is placed at the heart of a given conceptualization, Boon et al. (2019) arguments should be understood as a plea to divert attention towards the media as a stakeholder per se, rather than a ‘neutral’ channel through which agencies can communicate.

Another line of criticism directed at strategic communication as a form of reputation management revolves around the notion that strategic communication is episodic in nature, providing short-term solutions to emerging threats. This line of argument is derived from public relations literature, which distinguishes between two types of relationships—symbolic and behavioral relationships. The former type is based on superficial and short-term activities (communication) and the second on substantive and long-term activities (action) (Grunig 1993; see also Grunig 2014). Specifically, because an agency’s poor performance track-record can impede its

attempts to use communication to build a symbolic relationship or to improve the relationship with its audiences, the agency's focus on its real activities—rather than on the symbolic relationship with its audiences that is constructed via communication—should guide its long-term objectives. This view corresponds to the argument that an agency's communication is overemphasized in the literature because “[...] of the simple reality that reputational beliefs are about *real* organizational characteristics, and that the main venue to modify such beliefs is to act of them” (Picci 2015, 49). The route for reputation improvement is, therefore, “to improve the organization itself” (p. 37). General critiques of reputation management can be found elsewhere (Byrkjeflot 2015). It also corresponds to the view that “media policy takes care of a short-term reputational threat, whereas regulatory policy takes care of a long-term reputational threat” (Schanin 2015, 139).

Before responding to these criticisms, a few clarifications are in order. First, a regulatory agency's ability to communicate a positive “presentation of [it]self” (Goffman 1959) matters to its audiences. Second, strategic communication is a complex endeavor involving numerous components and choices regarding the message, the media outlets, the timing, and the completeness of the information disclosed, alongside many more factors. Third, strategic communication must be executed with considerable skill (Whittington and Yakis-Douglas 2012, 402). Taking these points on board, it is important to understand what claims bureaucratic reputation scholars do not advance.

Bureaucratic reputation scholars do not claim that communication responses by regulatory agencies are necessarily strategic. This is because some agencies are more competent than others in managing their response to reputational threats via strategic communication and, therefore, can see the fruits of their efforts. There are



grounds to believe that pursuing strategic communication indeed bears fruit: Barkat and Gilad (2017) have demonstrated that familiar promotional symbols can shape citizens' attitudes, and compensate for the effects of poor performance, with regard to sufficiently ambiguous organizational aspects. This strategic behavior may occur, however, alongside media preferences for certain items, framings and communication channels—in line with Boon et al. (2019) claim. Interestingly, a study of civil servants in Norwegian agencies, based on self-reported and cross-sectional data, found that agencies with competent media management report higher levels of autonomy (Koltveit 2019). Again, this may be a consequence of strategic communication behavior which may occur alongside media preferences for certain items, framings and communication channels, which are best understood and acted upon by media competent management departments—in line with Boon et al. (2019). Barkat and Gilad (2017) as well as Koltveit' (2019) studies exist alongside surveys and experiment-based research demonstrating that public organizations' communications and publications regarding performance information shape how citizens perceive government organizations (e.g., Barrows et al. 2016). Media-competent agencies can therefore continually 'sharpen' their communication instruments so that they are better prepared to cope with more severe reputational threats as well as with media interferences with the formulation and execution of agencies' strategic communication.

One should remember, however, that using identical strategic communication strategies may have different reputational consequences for different agencies. Even if two regulatory agencies pursue the same strategic communication behaviors, one may be acting in accordance with its audiences' expectations while the other may be positively or negatively violating such expectations. Besides, the same event may

trigger completely different communication behavior depending on the reputation basis of the agency in question. A classic example is the finding that the same event (i.e., withdrawing a dangerous drug from the market) elicits a blame-avoidance reaction among expertise-based agencies and provides an opportunity for credit claiming by agencies that act as guardians of public safety in the media (Maor 2011). In addition, identical strategic communication strategies may have different reputational consequences for different agencies because “[w]hat people know about an agency may parallel what they know of the agency head. [...] if the agency head is famous by virtue of his past achievements, he or she may be deemed worthy of attention” (Maor 2016b, 81).

Furthermore, bureaucratic reputation scholars do not claim that regulatory agencies cannot simultaneously engage in other strategic responses. On the contrary, the enormity of some reputational threats may lead agencies to use a repertoire of reputation protection strategies, the scope of which has not yet been fully uncovered by scholars. Relatedly, regulatory agencies may employ strategic communication to counter *potential* reputation risks, for example by pursuing strategic disclosure of regulatory agencies’ strategic plans, or voluntary disclosure of individual strategic moves. Perhaps more importantly, bureaucratic reputation scholars exercise caution when making generalizations. Thus, the argument that “reputational threats can also be overcome by non-strategic behavior like a genuine effort to improve performance by adopting new internal working procedures, increasing technical expertise and enhancing cooperation with other regulators” (Bach, et al. 2019, 21) cannot be advanced without reservations. Some threats may indeed be overcome by non-strategic behavior, while it may not be possible to overcome others in this way. At the end of the day, although one should commend genuine effort to improve an agency’s

performance, *what affects an agency's reputation is behavior that is not coherent with audiences' expectations* (Maor 2016b, 83). For example, an agency may genuinely try to improve its performance track record over one dimension while audiences' expectations are focused on another. By the same token, an agency may improve its output in a dimension with regard to which audiences' expectations are either biased (e.g., Marvel 2015, 2016; Baekgaard and Serritzlew 2016) or are much too high to be achievable given the current allocation of resources. Thus, understanding the active orientation of agencies to the construction, advancement, and protection of their reputations via strategic communication, among other strategies, constitutes a real intellectual challenge.

The criticism deriving from research on mediatization, news values, and agenda setting should be separated into two parts: (i) strategic communication is driven to some extent by the distinctive logic of the media rather than by agencies' assessments of the relative strength of different dimensions of their reputation, and (ii) the media may interfere with the reputational signals that agencies seek to communicate (Boon et al. 2019). For the former, determining whether or not strategic communication is driven by the distinctive logic of the media is first and foremost a matter of intentions. At the outset, intentions differ from desires in terms of their settledness, that is, "to intend to do something is, in part, to be settled on doing it [...]" (Mele 2009, 693). Intentions are formed by decisions, and they should accord with one's beliefs. Furthermore, two conditions make an action intentional. The first is that an agent, *S*, intentionally *A*-ed if and only if *S* *A*-ed the way *S* intended to *A*. The second is that *S* intentionally *A*-ed if and only if *S* *A*-ed for a reason (Mele 2009, 694).

Intentions behind strategic communication matter because a reputational motivation may be embedded in agencies' communication intentions. Future research should certainly gauge these issues. Yet, clear-cut findings demonstrate that agencies design different communication strategies in line with functional areas which differ in terms of the strength of their reputations (Maor, Gilad and Ben-Nun Bloom 2013; Moschella and Pinto 2018); the content of allegations (Gilad, Maor and Ben-Nun Bloom 2013); the agency's understanding of its core reputation and associated reputational threats over time and across (EU) agencies (Busuioc and Rimkuté 2019); the agencies' wish to manage uncertainties in their operating environment, and not only in response to specific allegations (Moschella and Pinto 2018); and their wish to influence immediate stakeholder behavior in addition to maintaining longer-term agency reputation (Abolafia and Hatmaker 2013). These findings clearly indicate that (i) the agencies concerned are deeply engaged in crafting their communication, and (ii) actual 'prioritizing' among dimensions of an agency's reputation indeed takes place, whether intentionally or not, and whether the media interfere with the formulation and execution strategic communication or not.

The argument that intentions matter implicitly assumes, however, that regulatory agencies and their audiences share the same conception regarding intentional action. This assumption is important because reputational benefits may be reaped only if the target audience would deem the policy selected by agencies intentional. The problem is that what lay persons and the wider community deem intentional or unintentional in particular cases may be biased by his, her, or their interests, by conspiracy theories, and the like (Marvel 2015; 2016). Consequently, lay persons may not inevitably link a particular policy response to the agency that initiated it, thereby inhibiting the flow of reputational benefits an agency will derive

from this policy. This is precisely the point at which strategic communication could enter into the fray.

The response to the second line of criticism, which centers on the notion that strategic communication provides a solely short-term, symbolic solution to emerging threats, is twofold. First, some aspects of strategic communication may indeed be episodic in nature, trying to persuade audiences that specific policy moves are valuable, yet others may reflect a long-term effort to maintain and enhance an agency's reputation. Furthermore, "[r]eputation can shape the behavior of organizational insiders as well as external stakeholders [...]. It can influence employees' sense of self and outsiders' expectations of the organization [...]. These two aspects, the short-term and the longer-term effects of signaling, can appear separately, but are often reinforcing" (Abolafia and Hatmaker 2013, 535).

Second, the impact of strategic communication cannot be divorced from the characteristic of the message that is communicated. In this respect, strategic communication may involve *policy overreaction rhetoric*, which refers to "arguments that policymakers employ to reach and persuade the target populations of their 'all or nothing' policy commitment to achieve their policy goal, no matter what the costs are" (Maor 2018, 53). Strategic communication may therefore involve messages primarily aimed at sending uncompromising signals regarding an agency's intentions, which are therefore likely to entail longer-term implications (see also: Maor 2012, 2017a, 2017b, 2017c, 2019a, 2019b). A case in point is the statement made by Mario Draghi (2012) while the Eurozone was in the throes of crisis: "[W]ithin our mandate, the ECB is ready to do whatever it takes to preserve the euro. And believe me, it will be enough." Furthermore, he reasserted this commitment in order to shield the Eurozone from the 2013 surge in US Treasury yield (Draghi 2013, 5). This is an

example of a fully-fledged policy instrument, termed *forward guidance*, which is used by central banks when communicating their future monetary policy. The decision here was to formulate a broad, qualitative, and vague statement (Draghi 2017), which, at the same time, was overwhelming, unconditional, and easily understood by both market participants and the general public. Assessing its success after a few years, Draghi (2017) noted that: “The purpose of this forward guidance was protective, not proactive, and it succeeded. It succeeded contrary [...] to everybody’s expectations and assessments at the time [...] We are simple folks, we stayed with simple formulas and it worked.”

Agencies’ use of overreaction and underreaction rhetoric, alongside other communication strategies, highlights their ability to go beyond taken-for-granted practices and symbolic constructions that limit their ability to follow a single end-means rationality. This undermines the claim made by organizational institutionalists that “[...] being apprehended as ‘strategic’ is often more important than actually communicated strategically (in its literal[...] sense)” (Wehmeier 2006).

### **Unanswered Questions**

At the heart of strategic communications lie choices that create winners and losers. Alongside the choice of whether to communicate, there is an equally important choice regarding how to communicate (Whittington and Yakis-Douglas 2012, 404). Future research should therefore pay closer attention to how reputation-sensitive agencies balance substantive and symbolic communication (e.g., Ashforth and Gibbs 1990); the way calculations regarding the completeness, coloring, and usability of substantive communication (e.g., Douglas and Meijer 2016; Grimmelikhuijsen 2012) enter into the fray; the manner in which agencies determine their communications’ timing,

medium, frequency, amount of content, use of language, and target audiences; and the way they justify a change in their communication strategy.

A focus on the actual performance of strategic communication may also inspire studies concerning the continuity and innovation in the narratives communicated by regulatory agencies; the institutionalization of strategic communication practices (e.g., Heide et al 2018); the variability in the use of discursive and other strategies by which meaning is communicated and interpreted, and the derived public policy implications; the importance of context (e.g., time; crisis) as a theme in strategic communication and as a determinant of the variability of the use of strategic communication; and the relevancy of policy overreaction rhetoric (Maor 2018) in pursuing reputation protection. Needless to say, all the aforementioned research avenues should include a focus on how these choices impinge on agencies' reputation and, consequently, the ways in which audiences allocate the resources they control (e.g., attention, support, etc.).

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