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The unintended restriction of access to territorial development policies due to administrative burden

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Extended Abstract

Background and Research Gap

The effects of administrative burden on policy access are well-documented in social policy. Learning, compliance, and psychological costs shape take-up and the experience of public programmes, and their weight falls disproportionately on individuals with fewer resources, limited administrative familiarity, or reduced capacity to navigate complex procedures (Heinrich, 2016; Herd & Moynihan, 2018). Non-take-up in this literature reflects both limited capacity and reduced willingness: potential beneficiaries assess whether the effort of engagement outweighs the expected benefits, and when the calculus is unfavourable they exit or disengage (Warin, 2017). The result is a form of administrative exclusion that disproportionately affects already disadvantaged groups — groups that public policy was in many cases specifically designed to reach (Brodkin & Majmundar, 2010).

Far less is known about how these dynamics operate in territorial development policies such as EU Cohesion Policy (Piattoni & Polverari, 2016). Unlike entitlement-based social programmes, territorial development policies rely on discretionary, project-based allocation, multi-level governance, and sustained engagement by organisational actors — municipalities, NGOs, firms, and public agencies — rather than individual citizens. Their effectiveness depends not on individuals claiming rights but on organisations investing the administrative resources required to apply for, obtain, and implement project funding. Whether and how administrative burden shapes these decisions, and with what distributional consequences for the place-based equity objectives of such policies, has received limited systematic attention.

Existing work points to the relevance of the question. Hansum (2025) identifies administrative complexity as an explanation for non-demand among potential Cohesion Policy beneficiaries, but does not trace the causal pathways through which this operates. Cunico et al. (2023) model implementation dynamics producing short-term responses that undermine long-term policy performance, including absorption of available resources, without directly addressing administrative burden as a mechanism. The need remains for a theoretically grounded account of how policy design and implementation decisions generate administrative burden and how the latter translates into differential access outcomes.

This article addresses that gap. It asks how administrative burden emerges in territorial development policies and how it influences actual and potential beneficiaries' access. Taking EU Cohesion Policy as its empirical terrain, it develops a theoretical model of three pathways through which administrative burden shapes access — two generating exclusion and one theorising mitigation — and submits this model to empirical test in the French region of Auvergne–Rhône-Alpes.

Theoretical Framework

The analysis builds on the administrative burden framework (Moynihan et al., 2015), which distinguishes three cost types: information costs arising from the effort required to understand access conditions and procedures; compliance costs arising from the time and resources needed to meet programme requirements; and psychological costs including perceived arbitrariness, institutional anxiety, and erosion of confidence in programme governance. Applied to organisational beneficiaries rather than individual citizens, these categories require conceptual adaptation: psychological costs manifest not as personal stigma but as institutional anxiety around audit risk and financial corrections, and as eroded confidence in programme governance.

The article differentiates administrative burden in territorial development policies from the "hidden politics" logic documented in social policy (Herd & Moynihan, 2018; Mettler, 2018), where burden is deliberately calibrated to suppress uptake. In Cohesion Policy, managing authorities are assessed on their capacity to commit and spend resources, not to restrict access. Administrative burden in this context is therefore more plausibly a product of unintended consequences of policy design than of deliberate gatekeeping — a distinction that shapes both the mechanisms through which burden arises and its distributional effects.

Three theoretical pathways are developed. Pathway 1 links stringent audit and verification requirements to compliance and psychological costs, producing differential exclusion of organisations with insufficient administrative capacity (H1). Pathway 2 links coordination failures across governance levels to ambiguity in procedural requirements and eligibility conditions, raising information and compliance costs disproportionately for lower-capacity actors and generating perceived arbitrariness as a secondary psychological cost (H2). Pathway 3 theorises inclusive inter-organisational cooperation — particularly the integration of local knowledge into programme design — as a mechanism capable of reducing information and compliance costs and improving access for a broader range of beneficiaries (H3).

Research Design and Methods

The empirical analysis focuses on ERDF and ESF programme delivery in Auvergne–Rhône-Alpes. France operates a decentralised delivery model in which regions act as programme authorities, producing precisely the multi-level governance structure central to Pathway 2. The region managed separate programmes for its two legacy territories in 2014–2020 before consolidating into a unified programme in 2021, providing internal variation across programme generations and fund types within a single institutional setting. The accumulated complexity of sequential grant cycles, frequent regulatory modifications, and multi-actor accountability chains makes all three theoretical pathways empirically traceable.

A qualitative process-tracing case study design is used (Beach & Pedersen, 2019). The analytical strategy proceeds in two steps: first identifying design and implementation features that generate administrative burden, operationalised through the three cost types; then assessing how these features distribute access outcomes across beneficiary types. Access is treated as unequal when the distribution of funded projects reflects differences in the capacity to overcome administrative barriers rather than differences in project quality or strategic alignment with programme objectives.

The analysis triangulates across four empirical sources: 52 semi-structured interviews conducted between April 2022 and February 2025 with managing authority staff, beneficiaries, intermediary organisations, and national and EU-level actors; participant observation of implementation processes; documentary analysis of EU regulations, national instructions, and regional procedural materials; and a beneficiary survey. Purposive sampling maximised variation across roles, organisational tiers, fund exposure, and programme generations, complemented by snowball recruitment to analytical saturation.

Key Findings

Information costs and the relational structure of access (H2)

The first empirical pathway operates at the point of entry. Managing authority staff describe the programme's information environment as systematically inaccessible. Technical eligibility documentation is written from an administrative rather than user perspective and diverges from operational practice in ways that generate confusion. Officials acknowledge that the existing communication infrastructure is inadequate, with one stating that they genuinely do not know how someone unfamiliar with European funds would access them. The result is not merely a technical information deficit but a climate of uncertainty in which the perception of programme complexity acts as a deterrent before any formal engagement has taken place — a mechanism the article terms burden-induced aversion, distinct from ignorance of the programme.

Survey data confirm that information access is overwhelmingly relational: 34% of beneficiaries first learned of funding opportunities through professional networks and a further 34% through institutional partners, while formal channels — websites, social media, public events — account for fewer than 20% of initial contacts combined. Among survey respondents, 75% reported prior experience of multiple funded projects and 53% had managed more than three, consistent with a prior regional assessment finding that 71% of project leaders already had European fund experience at entry. The programme is effectively accessed by repeat players embedded in established institutional networks, while isolated actors face prohibitive entry barriers.

Compliance costs, capacity thresholds, and self-exclusion (H1)

The second empirical pathway operates through compliance cost pressure on both the managing authority and beneficiaries. The managing authority faces a fixed administrative workload per project largely independent of grant size, creating a structural incentive to favour large-scale projects. This implicit preference has been formalised in minimum expenditure thresholds — generally €50,000, rising to €150,000 for certain measures — that function not as eligibility criteria but as administrative capacity proxies. Officials acknowledge openly that these thresholds exclude organisations not on grounds of project quality but on grounds of presumed inability to sustain compliance demands. The distributional consequences concentrate programme engagement among large local authorities and institutionally well-endowed organisations, while small municipalities, under-resourced associations, and actors in peripheral territories are effectively excluded.

A parallel exclusion mechanism operates through the decisions of potential beneficiaries themselves. Survey data and interview testimony document a pattern of deliberate non-engagement among eligible organisations that judge administrative costs to exceed expected benefits. Critically, this self-exclusion is frequently driven by anticipated rather than experienced burden: reputation, peer accounts, and initial exploratory contact with the administration are sufficient to produce sustained disengagement. Cases were documented in which experienced, well-resourced organisations forewent grants worth €200,000 more than available alternatives specifically to avoid ERDF administrative obligations, and in which project leaders expressed willingness to delay projects by six months to avoid European co-financing. These cases demonstrate that burden-induced deterrence is not a product of ignorance or incapacity but of rational cost-benefit assessment — and that if it operates at the level of well-resourced actors, its effect on smaller organisations must be considerably stronger.

The entanglement of burden and mitigation (H3 qualified)

The most theoretically significant finding concerns the relationship between the burden-generating pathways and the cooperative mitigation mechanism theorised in H3. Network-based intermediaries, sector coordinators, and the managing authority's operational departments do demonstrably reduce burden for the organisations they serve — H3 is not falsified. However, access to these mitigating structures is itself conditioned by the network embeddedness and institutional resources that Pathways 1 and 2 show to be unevenly distributed. Cooperative mitigation operates selectively, benefiting organisations already least burdened. The managing authority's deliberate investment in intermediary networks — financing coordination positions in chambers of commerce and sector associations — is a rational response to capacity constraints, but institutionalises rather than corrects the insider advantage: it channels mitigation resources toward already well-connected actors while leaving isolated organisations without equivalent support.

This finding points to a dynamic the article terms the entanglement of burden and mitigation: in multi-level, multi-actor governance settings, burden-generating and burden-mitigating mechanisms are structurally interdependent rather than analytically separable. The same coordination failures that generate ambiguity and information costs also shape who gains access to the relational structures through which burden is mitigated. The same capacity constraints that lead the managing authority to filter applicants also determine which intermediary networks receive institutional investment. The result is that cooperative arrangements tend to reproduce rather than correct differential exclusion unless explicitly designed to reach actors outside established networks — a condition the current model does not satisfy.

The Paradox of Administrative Cohesion

Taken together, the findings reveal what the article terms the paradox of administrative cohesion. Cohesion Policy is designed to correct territorial and structural inequalities; its place-based logic explicitly targets the actors and territories most in need of investment support. Yet the administrative architecture through which it is implemented systematically disadvantages precisely those actors. The organisations most likely to be excluded — by compliance thresholds, information opacity, the absence of network relays, and the deterrent effect of programme reputation — are those for whom European investment support would be most transformative. The organisations that dominate the funded portfolio are those for which it functions as an additional strategic resource rather than a corrective one.

This paradox has both effectiveness and democratic dimensions. It undermines programme performance by concentrating funded activity among large-scale incumbent organisations, and it erodes institutional legitimacy by creating a system in which access depends more on administrative solvency and network position than on project quality or territorial need. The co-financing rate asymmetry between Rhône-Alpes (40% ERDF rate) and Auvergne (60%) further illustrates how programme design parameters interact with administrative burden to produce spatially differentiated access outcomes — a finding with direct implications for the place-based equity logic that Cohesion Policy is designed to advance.

Theoretical Contributions and Implications

The article makes three contributions to the literature. First, it extends the administrative burden framework to organisational beneficiaries in a project-based governance setting, showing that the three cost types operate meaningfully for collective actors while requiring conceptual adaptation. Psychological costs manifest through institutional rather than personal mechanisms; compliance costs are absorbed by organisational structures whose capacity varies systematically across actor types. The framework travels, but its application to organisations demands analytical refinement that this article begins to develop.

Second, it theorises and empirically demonstrates the entanglement of burden-generating and burden-mitigating mechanisms in multi-level governance — a dynamic not previously identified in the administrative burden literature. This finding has implications beyond Cohesion Policy: in any multi-actor policy domain where cooperative arrangements are deployed as a response to administrative complexity, those arrangements risk reproducing the access inequalities that complexity generates unless mitigation is explicitly designed to reach actors outside established relational networks.

Third, it provides the first systematic empirical confirmation that non-take-up dynamics well-documented in social policy apply to investment-oriented territorial development policies. This transposition is not automatic — the deliberate hidden politics logic does not transfer intact to a context where managing authorities are incentivised to maximise absorption — but the access-restricting effects of administrative burden are demonstrably present and structurally generated by programme design rather than incidental to it.

For programme design, the findings suggest that procedural simplification — the dominant response in successive regulatory reform cycles, including proportionality provisions and simplified cost options — addresses the symptoms of burden without resolving its structural sources. Correcting differential access requires not only simpler procedures but an explicit reorientation of intermediary and cooperative structures toward actors currently outside their reach: ungrouped organisations, small municipalities, and actors in peripheral territories for whom the relational architecture of programme access currently functions as a barrier rather than a bridge.

Key References

Beach, D., & Pedersen, R. (2019). *Process-Tracing Methods*. University of Michigan Press. https://doi.org/10.3998/mpub.10072208

Brodkin, E. Z., & Majmundar, M. (2010). Administrative Exclusion: Organizations and the Hidden Costs of Welfare Claiming. *Journal of Public Administration Research and Theory*, *20*(4), 827–848. https://doi.org/10.1093/JOPART/MUP046

Cunico, G., Aivazidou, E., & Mollona, E. (2023). Investigating Supply and Demand in European Cohesion Policy: Micro-Foundations of Macro-Behaviours. *Journal of the Knowledge Economy*. https://doi.org/10.1007/s13132-023-01430-6

Hansum, R. (2025). ‘Why organizations leave money on the table: explaining non-demand for EU funds.’ *Regional and Federal Studies*. https://doi.org/10.1080/13597566.2025.2485052

Heinrich, C. J. (2016). The bite of administrative burden: A Theoretical and empirical investigation. *Journal of Public Administration Research and Theory*, *26*(3), 403–420. https://doi.org/10.1093/jopart/muv034

Herd, Pamela., & Moynihan, D. P. . (2018). *Administrative Burden : Policymaking by Other Means*. Russell Sage Foundation.

Mettler, Suzanne. (2018). *The government-citizen disconnect*. Russell Sage Foundation.
Moynihan, D., Herd, P., & Harvey, H. (2015). Administrative burden: Learning, psychological, and compliance costs in citizen-state interactions. *Journal of Public Administration Research and Theory*, *25*(1), 43–69. https://doi.org/10.1093/jopart/muu009
Piattoni, Simona., & Polverari, Laura. (2016). *Handbook on cohesion policy in the EU*. Edward Elgar Publishing.
Warin, P. (2017). *Le Non-recours aux politiques sociales*. Presses universitaires de Grenoble.