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# Unraveling how intermediary-beneficiary interaction shapes policy implementation

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#### Abstract

As a result of policy growth, implementing agencies often face new mandates without the necessary capacity expansion to comply with, thus resorting to intermediaries. However, intermediaries are not innocuous to the implementation process, especially when they are expected to play the double role of target and intermediary, responsible for translating/interpreting regulation for beneficiaries. How does the interaction between beneficiaries and intermediaries-target shape policy implementation? I argue that such interaction is not only determined by the role the intermediary adopts, and their relation with the beneficiary, but also by the motivations beneficiaries have for engaging in the regulatory process, and their capacity to do so. I develop a theoretical framework for understanding their interaction and apply it to a new regulatory policy in Mexico to provide social security for paid domestic workers. I explore the mechanisms by which the interaction between intermediaries and beneficiaries affects the outcome of the regulatory process.

Keywords: beneficiaries, labor regulation, paid domestic workers, policy growth, regulatory intermediaries.

### 1. Introduction

When policies are introduced, organizations face new demands. Existing administrative capacities, bureaucratic routines, and individual workloads are challenged by the new policy mandate. Implementing agencies develop behavioral routines to adapt to these changes, and how they do so will ultimately shape their implementation and policy outcomes (Adam et al., 2019; Sager & Gofen, 2022; Thomann et al., 2016). It has become common for those agencies to deploy organizational strategies, including prioritizing the implementation of one policy over others (Zink et al., 2024) or incorporating intermediaries as implementers (Abbott et al., 2017) in order to cope with policy growth. When a new mandate does not come with the corresponding additional administrative capacity expansion, organizations develop behavioral routines (Adam et al., 2019).

An intermediary may be a person, an organization, or a network (Brès et al., 2019) that "stands between the regulator and its target" (Abbott et al., 2017) to perform different functions that regulators themselves cannot undertake. The study of regulatory arrangements acknowledges that there is an intermediary (I) between a regulator (R) and their target (T) (see Abbott et al., 2017 in their "RIT model").

Yet, not all regulatory arrangements fit the RIT model. There are cases where a group of actors is the intended beneficiary (B) and yet they are not a (direct) target of the regulation (Koenig-Archibugi & Macdonald, 2017), as in the case of regulation for protecting the labor conditions of digital platform workers (Nielsen et al., 2022). There are also cases where many intermediaries operate simultaneously (Monciardini & Conaldi, 2019), as in the case of sex workers in India (Goyal, 2022). In this paper, I focus on an additional extension of the RIT model: Cases where a person or organization is both direct target and intermediary. In these cases, the regulatory policy attempts to modify a person's behavior (as target) and at the same treats them as intermediaries, making them responsible for handling public problems or supporting public goals (Hysing, 2021). This situation opens up the possibility for conflict of interest: it gives intermediaries the possibility to decide whether or not to align their own and others' behavior toward the policy goals, thus shaping implementation in ways that does not necessarily match the regulator's intentions.

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There are many instances where an individual assumes the dual role of direct target and intermediary. Sweden's prostitution policy, for example, designates clients of sex workers as targets, as they face potential fines or legal consequences for purchasing sexual services. Yet, they also function as intermediaries tasked with combating exploitation and trafficking of sex workers (the beneficiaries of the regulation), bearing the responsibility for self-governing (Erikson & Larsson, 2022; van Wijk & Mascini, 2022). This dual role is echoed in Australia's disability service system, where care workers are the target of new regulations aimed at improving service quality while concurrently acting as intermediaries for the disability people (the beneficiaries of the regulation), responsible for keeping records on service quality and reporting them to the authority (van Toorn & Cortis, 2023).

In these and other instances, there exists considerable variation in the extent to which intermediaries' behavior align with policy goals. This difference is often attributed to the dynamic relationship between intermediaries and beneficiaries, with the latter defined as "the groups whose interests the rules are meant to protect" (Koenig-Archibugi & Macdonald, 2017). However, the explanation is more complex than that: the intermediary-beneficiary relationship is not straightforward, and implications for the implementation process cannot be automatically deduced. In order to account for these interactions, I add a further, usually neglected, component: the role of the beneficiary not as a passive target of a regulation but as an active agent, who also brings their own motives and values into the interaction with the dual role of the intermediary (as intermediary and target).

Ignoring this component, and the complex dynamics between beneficiaries and intermediaries-targets has limited the explanatory potential of numerous studies, which attribute both compliance and non-compliance to their relationship in general, without providing causal explanations. Consider the case of care workers in Australia: It is argued that while some care workers adjusted their routines to comply with the new regulation "out of commitment to their job and clients" (van Toorn & Cortis, 2023), others resisted acting as intermediaries for the same reason.

How does the interaction between beneficiaries and intermediaries-target shape policy implementation? I argue that such interaction is not only determined by the role the intermediary adopts, and their relation with the beneficiary, but also by the motivations beneficiaries have for engaging in the regulatory process, and their capacity to do so. To develop this argument, I provide an analytical framework that expands the current discussion on regulatory intermediaries to the study of targets that also perform the role of intermediaries, interacting with beneficiaries as actors with agency. To exemplify this framework, I study the case of the policy aimed at registering paid domestic workers (PDW) to social security in Mexico, a policy created in 2018, where the government relied on the support of the PDWs' employers to implement it. As in the cases of care workers in Australia, the Swedish clients of sex workers, or many employers of workers performing in the gig economy, in the Mexican case PDW's employers serve as targets of the new regulation and as regulatory intermediaries. They are targets of the regulation since they are obliged to register them to social security, and they are intermediaries since they are responsible for explaining the social security regime to PDWs and helping them enroll into the program.

The article is structured as follows. I first review the literature to identify how beneficiary's involvement shapes intermediation processes and, by doing so, affect policy implementation. Next, I introduce an analytical framework designed for analyzing the roles, motivations, and relationships between intermediaries and beneficiaries. Then, I present the case of PDW in Mexico and the methodology for the analysis. I then describe how roles, motivations, and the relationships between PDWs and their employers played out in the Mexican case and shaped the implementation process. In the next section, I present a discussion with the relevant literature and, in the conclusions, I advance some implications for policy implementation and regulatory intermediaries, and for further research.

# 2. Policy implementation, policy growth, and intermediaries

Since policy accumulation eventually leads to the growth (in size and quantity) of a policy domain, implementation deficits arise due to the administrative burdens imposed over the bureaucracy (Knill et al., 2012). Recently, the literature on policy implementation has looked at regulatory intermediaries as a response to bureaucratic workload. In this section, I review the literature to explore the current understanding of the intermediation process (and its implications on implementation), particularly regarding beneficiaries and their interaction with intermediaries.

The study of regulatory intermediaries provides insights into how organizations deal with policy growth. This literature builds on the premise that regulators do not always have the capacity to implement and enforce regulatory policies: they lack direct access to the target population, direct means to influence their behavior, or the necessary channels to monitor compliance. Organizations seek to compensate for this limited capacity by working through a third party: an intermediary (Abbott et al., 2017).

Research on intermediaries focused initially on the dynamics between regulators (R), their targets (T), and the intermediaries (I) (Abbott et al., 2017). The intermediary's role was characterized based on the regulatory setting where they perform (i.e., private, public, or hybrid), their resources and capabilities (Van der Heijden, 2017), and their interaction with rule takers (Abbott et al., 2017). These theoretical insights led to the development of a role-based framework that explains how organizations adopt the role of intermediation. This framework involves four key interrelated elements: the *activities* that the organization exhibits, the *motives* to participate, the *resources* available, and the *relationships* to other actors (Kourula et al., 2019).

These insights guided new research toward a more nuanced understanding of intermediation, particularly in two directions: involving other actors, and their role in the process. On the one hand, it was acknowledged that there are instances where other non-state actors take part: the beneficiaries of the regulation (B), and that their interaction with intermediaries shapes the implementation process (Koenig-Archibugi & Macdonald, 2017). However, the focus has not been put on beneficiaries *per se* but on their relation to other actors involved (intermediaries, targets, regulators). The underlying assumption is that the role of beneficiaries is a function of the role intermediaries play in the process (i.e., if intermediaries represent and translate regulation for beneficiaries, then the beneficiaries' role is to be represented). This notion places beneficiaries as actors that are subject to a relationship with an intermediary, but do not address how beneficiaries themselves affect this relationship.

Yet, beneficiaries are also actors with agency. Despite the evidence that shows that "there are good reasons to believe that beneficiaries' relationships to intermediaries affect the interpretation and implementation of rules, and that this has potential implications both for the welfare of beneficiaries and for regulatory outcomes" (Koenig-Archibugi & Macdonald, 2017, p. 52), how beneficiaries contribute to such relation has not yet been addressed.

At the same time, the literature on the subject has expanded upon Abbott et al.'s (2017) concept of the potential overlap between the roles of intermediary and target. Koenig-Archibugi and MacDonald (2017) suggest that the same person can have different identities during an intermediation process. Erikson and Larsson (2022) emphasize the "tensions and complexities" arising when a private actor is placed in the dual capacity of intermediary and target. They underscore the need for further exploration into how regulatory strategies impact them as a target and subsequently influence their performance in the intermediary role. However, the examination of the dual role as intermediary and target has primarily focused on the challenges it poses for the regulator, neglecting its implications for the relationship with beneficiaries. This omission is relevant, since intermediaries' dual role essentially positions them as a "judge and jury," thereby influencing power dynamics in the regulatory process, including those with beneficiaries whose well-being the regulation aims to safeguard.

In sum, existing theoretical approaches alone cannot encompass the full complexity of the intermediation process. To fill this gap, I propose a framework with theoretical expectations of the dynamics of intermediariestargets and beneficiaries' interaction within the implementation process.

# 3. An analytical framework for studying intermediaries as targets and beneficiaries as indirect targets of a regulation

Following the literature on regulatory intermediaries, I use *roles and activities, motives*, and *relationships* as analytical categories to study both intermediaries and beneficiaries. As recent studies have shown, these are the most crucial, interconnected factors involved in the intermediation process<sup>1</sup> (see Abbott et al., 2017; Kourula et al., 2019; Peterman et al., 2014). Table 1 depicts the theoretical expectations of the roles, motivations, and relationships of both intermediaries and beneficiaries in the implementation of a regulatory policy. Each of these theoretical expectations is explained in detail in the following lines.

TABLE 1 Theoretical expectations for intermediaries-targets and beneficiaries

	Role and activities  In what capacity do beneficiaries and intermediaries engage in the process? What activities are they expected to undertake?	Motives  What are the benefits of engaging in the process? What are the costs of doing so?	Relationship What is the power relationship between intermediaries and beneficiaries?
Theoretical expectations for intermediaries as direct targets	If they disagree with how the rule aims to affect beneficiaries, intermediaries may resist policy implementation; agreement may result in cooperative implementation.  (Expectation 1)	If learning, compliance, and psychological costs impede intermediaries from pursuing the policies that are aligned with their principles in relation to the beneficiaries, then they would consider the cost of engaging in the process too onerous, and vice versa.  (Expectation 3)	If intermediaries-targets cannot be held accountable by the regulator or the beneficiary, they will hold an advantageous position in the power relation with beneficiaries, and vice versa.  (Expectation 5)
Theoretical expectations for beneficiaries (indirect targets)	If beneficiaries have a negative self-perception of their social standing vis a vis bureaucracy, then it is unlikely they support and advocate for the benefits they are entitled to, and vice versa. (Expectation 2)	If beneficiaries expect the rewards they can obtain from the program will improve their well-being in the immediate term, beneficiaries will be willing to assume the cost of coping with administrative burdens, and vice versa.  (Expectation 4)	If beneficiaries can serve as a check on the intermediaries behavior, then their position in the power relation may shift to their favor, and vice versa.  (Expectation 6)

Source: Own elaboration.

# 3.1. Roles and activities

Roles (mother, daughter, employer, community leader, etc.) explain individuals' social behavior since they set expectations and duties for them to fulfill in relation to others (Kourula et al., 2019). Thus, understanding the intermediaries' and beneficiaries' roles in the regulatory process requires having a grasp of the activities they are expected to undertake.

Intermediaries' role is influenced by the ambiguity of regulations and their intended purpose in the regulatory process. When rules are vague, intermediaries are expected to interpret and "translate" them for the targets. They may also be brought to the process to facilitate program execution or verify its implementation (Abbott et al., 2017; Brès et al., 2019; Kourula et al., 2019; Monciardini & Conaldi, 2019). Beneficiaries, on the other hand, are likely to play a role in monitoring and providing feedback on regulation effectiveness (Koenig-Archibugi & Macdonald, 2017). Beneficiaries are expected to modify their behavior to meet a standard (sex-workers are expected to take measures to safeguard their physical integrity, or employees are expected to reject a job offer that denies them fair wages). Completing these tasks, however, does not occur only because it is mandated by the rule. Intermediaries-targets' and beneficiaries' value system plays an important role in this.

Neither intermediaries' nor beneficiaries' tasks are neutral: they are valued-laden. Actors (regulators, intermediaries, targets, and *beneficiaries*) tell themselves "stories" about the policy and their role in it. Such a story is guided by their own understandings and values that do not always coexist seamlessly with other actors' interpretations (Michel et al., 2022). When an actor performs the double role of target and intermediary, their room for interpreting the regulation increases: because the regulator depends on him as intermediary, this "provides him with leverage to perform his role as target" (van Wijk & Mascini, 2022: 887). In such cases, the opportunity for intermediaries to shape the interpretation of compliance to their advantage increases (Edelman & Talesh, 2011). Indeed, intermediaries deploy strategies according to their value system in relation to the content of the policy (Ciornei et al., 2023), which somehow seeks to affect beneficiaries. If intermediaries disagree with how the rule

aims to affect beneficiaries, they may passively or actively resist implementing the regulatory policy. Conversely, agreement with the regulator's vision for beneficiaries results in cooperative implementation (*Expectation 1*).

Beneficiaries, on the other hand, also bring their own values to the implementation process. Even when they are part of vulnerable groups, beneficiaries are not passive agents (Parsell, 2018), on the contrary, they have agency and thus are able to act in the way they consider that best favors their interests (Gofen et al., 2019). Policies play an important part influencing such agency, since they allocate power and thus characterize certain groups as deserving or underserving of social benefits (Schneider & Ingram, 1993). This in turn shapes beneficiaries' perceptions of their rights and entitlements (Khawaja & Khalid, 2022). However, individuals' human capital (scarcity, health issues, and cognitive decline) also plays a significant role in shaping their interaction with governmental processes. Groups characterized by lower levels of human capital tend to struggle more with administrative burdens, making them less likely to access public services (Christensen et al., 2020). Therefore, regardless that the implementation of the policy enhances their self-perception of worth and entitlements, their perception of their social standing vis a vis the bureaucracy also influence their behavior. Consequently, the more negative their perception of their social standing, the less likely they are to support the policy and advocate for the benefits they are entitled to (*Expectation 2*).

### 3.2. Motivations

Motives explain the reasoning for actors to engage in any process. In the case of regulatory processes, both intermediaries' and beneficiaries' motivations are informed by the benefits and costs they expect out of them. Where intermediaries are also targets of regulation, they encounter costs and benefits as intermediaries, but also as targets. As targets, they are subjected to regulatory measures attempting to modify their behavior. Accordingly, the costs of engaging in the process take the form of constraining rules: imposing responsibilities on them, limiting their choices (Koenig-Archibugi & Macdonald, 2017). Yet, "sometimes intermediaries are the ones called upon to regulate others, while in other situations they are targeted to govern themselves" (van Wijk & Mascini, 2022).

When individuals act as intermediaries, the responsibility for regulating others' behavior materialized in the different tasks they have to fulfill for translating and facilitating the policy. Complying with this regulation depends on them actively engaging with the regulator, the beneficiary, or both. The benefits they expect to get from the process may be material if they are motivated by self-interest, or intangible (recognition, autonomy) if motivated by their loyalty to a person, a principle, or an institution (Abbott et al., 2021). The costs they face take the form of administrative burdens, as individuals face learning, compliance, and psychological costs in their interaction with the State: filling forms, understanding an administrative process or fulfilling compliance requirements (i.e., show up in a certain place at a given time) (Herd & Moynihan, 2019). Whether these costs are considered too onerous to engage in the process depends not on their absolute value but on what motivates intermediaries: if it is self-interest, engaging in a process would be too onerous y for them if those costs hinder them from taking up more lucrative roles or positions; instead, if intermediaries are motivated by their loyalty, costs will be too onerous only if perceived as a way for being controlled or marginalized. In sum, if learning, compliance, and psychological costs impede intermediaries from pursuing the policies that are aligned with their principles in relation to the beneficiaries, then they would consider the cost of engaging in the process too onerous (*Expectation 3*).

This same premise may be extended to explain the beneficiaries' motives. Recent research has shown that social policy implementation may be hampered by resistance from beneficiaries (Ranci & Arlotti, 2019). Before enrolling in a program, potential beneficiaries compare the costs they would incur in if they participate in the program against the benefits they would get (Currie, 2004). Benefits are assessed in terms of their potential to contribute to their well-being. Yet, sometimes people have time-inconsistent preferences whereby they prioritize earlier moments as they approach, even if waiting could get them greater benefits (what O'Donoghue & Rabin, 1999 named "Present-biased"). On the other hand, the costs against those benefits are compared with are thought of in terms of time (to learn about the program and how to enroll) (Daigneault & Macé, 2020). Indeed, the take up of a program starts by being aware of its existence. The following stages go from knowing the eligibility criteria, the kind of benefit offered, the application procedure, and, once selected, understanding how to comply with the administrative rules. The costs of acquiring such information would depend on "whose shoulders the program's design and administrative practices place the administrative burden." (Daigneault & Macé, 2020: 2–3).

Socially disadvantaged people are more likely to also be "administratively disadvantaged" (Peeters & Nieto-Morales, 2021: 21) because their ability to understand how bureaucracy works, what Döring (2021) calls "administrative literacy," is lesser making it more difficult for them to navigate the administrative procedures. Therefore, the assumption that "those who wait in line, turn up for an appointment, or complete a form value the benefit more than those unwilling to do so" is incomplete (Christensen et al., 2020). Thus, if beneficiaries expect the rewards they can obtain from the program will improve their well-being in the immediate term, beneficiaries would assume the cost of coping with administrative burdens (*Expectation 4*).

### 3.3. Relations

Introducing an intermediary affects the power relation between the actors involved in the regulatory process. Originally, it was argued that by delegating the regulatory responsibilities to intermediaries the State shifted the balance of power in their favor (Abbott & Snidal, 2009). Yet, as van Wijk and Mascini (2022: 879) argue, "power does not necessarily shift unambiguously in one direction. Rather, the mobilization of intermediaries can both empower them by involving them in regulation and disempower them by holding them responsible for regulating."

In any regulatory arrangement there are power relations at play. Targets have interest in capturing the intermediary in order to guide their interpretation or enforcement of rules in a way that favors them (Abbott et al., 2017), although their chances to succeed in this task depends on how insulated the intermediary is from target influence (Maggetti et al., 2017). On the other hand, intermediaries generate "informational advantages" from interpreting the rules and translating its meaning for beneficiaries (Abbott et al., 2017). Therefore, intermediaries seek to increase such advantages by promoting rules or monitoring indicators that are less costly for them to comply with (Galland, 2017). Hence, when an actor plays the double roles of intermediary and target the conflict of interest is absolute.

However, what holds true for both an intermediary and a target is that accountability mechanisms delimit their discretion. Indeed, while the new regulatory policy is a source of power, how it is exercised depends on the room for discretion they have to do so (see Gilson et al., 2014). By making intermediaries and targets accountable to the regulator or the beneficiary the room for discretion for the intermediary to interpret the rule decreases, whereas the possibility for noncompliance as targets also diminishes. When implementing the policy that legalized prostitution in the Netherlands, for instance, owners and managers of brothels and windows complained about having to do the work for the police of determining whether sex-workers are in that job voluntarily. Yet, as they are accountable to the regulator by being subjected to effective monitoring mechanism (inspections), they opt for self-governing: "the power balance has shifted away from entrepreneurs and sex-workers and toward the municipality because, although generally unhappy with the *responsibilization* strategy, entrepreneurs have complied with it by self-disciplining." (van Wijk & Mascini, 2022: 886).

When accountability relies on beneficiaries, their capacity to prevent evasion is key to avoiding deepening their dependence on the group to which they are subordinated. Thus, if intermediaries-targets cannot be held accountable by the regulator or the beneficiary, they will hold an advantageous position in the power relation with beneficiaries (*Expectation 5*), whereas if beneficiaries can serve as a check on the intermediaries behavior, then their position in the power relation may shift to their favor (*Expectation 6*).

Table 1 shows how beneficiaries (as indirect targets) and intermediaries also acting as direct targets are expected to shape policy implementation in terms of their roles, motives, and relationship.

Naturally, this framework is limited to the analysis of regulatory processes where intermediaries are direct targets and beneficiaries are involved as active players. It shows that the implementation process is shaped not only by the design of a policy or even by the roles prescribed for the intermediaries; as I later exemplify with the case of PDWs in Mexico, the process of implementation is also expected to be shaped by the roles and motives of both intermediaries and final beneficiaries, and by their own relationship.

# 4. Research design

In this paper, I suggest that both beneficiaries and intermediaries, and the interaction between them, affect the implementation process of a regulatory policy. To develop this argument, I presented an analytical framework

with theoretical expectations regarding their roles, motivations, and relationships to study how they both shape the implementation process. In the following section, I use the policy for registering PDWs to a Social Security scheme in Mexico to exemplify the analytical framework. Before doing that, in this section I explain why this policy is useful for illustrating my argument and present my sources and methods.

Worldwide, 6% of PDW have access to comprehensive social protection (ILO, 2021a). In Mexico, only 2.4% of the 2.5 million people working as PDW has social insurance (INEGI, 2023). The policy for registering PDWs to a Social Security Scheme in Mexico is useful to showcase a regulatory arrangement where intermediaries are direct targets, interacting with beneficiaries (indirect targets) for two reasons. First, because the Mexican government lacks the information to identify and locate PDW to advise them about their rights, it relies on their employers as intermediaries to translate the new regulation for them, while also being the target of the regulation since they are charged with the responsibility to register them. Hence, this is a good case to exemplify a framework that analyzes instances of intermediaries that are also direct targets of a regulation that seeks to protect a specific population. This is not a peculiarity exclusive of the Mexican case: all over the world the enforcement of rules aimed at protecting PDW is challenging because the work they perform takes place in a private household, which means that social security inspections cannot legally be held there or, if legally permitted, would require an unaffordable number of inspectors (ILO, 2021b; see also Paraciani & Rizza, 2021). Therefore, the decision for complying heavily rest upon employers, which makes it a relevant case for discussing Expectations 1 to 4.

The second reason is that this is a case where intermediaries are barely accountable to the regulator or the beneficiary. Unlike the case of the prostitution policy in the Netherlands where the owners and managers of brothels are accountable to the regulator, in the Mexican case the possibility to make employers (targets-intermediaries) accountable is low because the government does not know who works as a PDW or where they work. This gives employers more room to interpret the law that they are meant to comply with, but because the government lacks the capacity to empower PDW to demand their rights, the imbalances of power between them and their employees deepen, and thus employers are unaccountable to them too. This allows for better discussing Expectations 5 and 6, and therefore shed light to regulatory arrangements where power imbalances between beneficiaries and targets-intermediaries are considerable. For example, neighbors as beneficiaries of a policy governing the generation of hazardous air pollution may be less empowered than the industrial emitters the policy is targeting; workers as beneficiaries of a safety workplace regulatory policy or informal workers in general rendered as beneficiaries of labor regulation.

Based on the analytical framework presented above, in the following paragraphs, I explain how the implementation process is shaped by employers as intermediaries and targets of regulatory policies, and by PDW as beneficiaries and indirect targets. For doing so, I characterize the roles and motivations of PDWs and their employers and their relationship using different methodological approaches: I conducted a documentary review that was later complemented by interviews with federal and local public officials and PDWs, as well as with a questionnaire to PDWs' employers (see the Supporting Information). The evidence retrieved from these sources was later organized around the analytical categories provided by the framework for their further analysis.

The sequence and logic of the different approaches are the following: The first aim was to characterize the role assigned to PDWs and their employers in the process of implementation. Therefore, I conducted an analysis of the regulation itself and of official federal government records and administrative data. Given the ambiguities of the regulation in some instances, this information was complemented with semi-structured interviews with four public officials involved in the implementation of the program. The next step was to compare the demands of the regulatory policy (in terms of the expected roles of beneficiaries and intermediaries) to its actual implementation (the reasoning and motivations for enrolling or not in the new regulatory program). To this end, I conducted semi-structured interviews during November of 2021 with two PDWs (one with social security and one without). I complemented this interviews with the results of a survey to 428 PDWs working in Mexico City, which was conducted in September 2020 by the Council to Prevent and Eliminate Discrimination in Mexico City (COPRED), in collaboration with two local civil society organizations, the Ministry of Labor and Employment, the Ministry for Native Peoples and Resident Indigenous Communities, and the ILO in Mexico (COPRED, 2021). The aim of the survey was to understand the extent to which the labor rights of PDW were being secured. I also interviewed three employers that have registered their domestic workers and two who have not, to develop an understanding of their relationship with their employees. Since these interviews were

conducted when the social security regime was already in place, but its compliance was still voluntary, a second round of interviews was conducted 6 months after the law was passed (and so the new social security regime became mandatory). This second round included six more interviews, carried out during June 2023.

Additionally, to understand PDW's employers experience as intermediaries and their expectations and experience when registering (or not) their PDW, I applied a questionnaire to 170 employers of domestic workers. Since this job is performed in private homes by vulnerable people as part of a working relationship outside the formal economy, there are practical restrictions and ethical considerations to employ a different method. The findings of this questionnaire do not aim to be representative but to capture a rather unseen working relationship. With that aim, the selection of respondents was based on a snowball sample technique according to which the questionnaire was shared with a small pool of people that had a PDW working for them, seeking to maximize variation in the social security status of their PDW, their job status and their PDW's length of service. Each of those respondents then shared the questionnaire with their network.

The questionnaire, applied in May 2022, had three sections (summary data on respondents is provided as Supporting Information). The first focused on the characteristics of the employer's household. Since the objective was to understand their and their PDW's roles and motivations to engage in the regulatory process, the aim was to understand the type of workload that the household represented for the PDW. It contained questions regarding the number of people in the household that required to be taken care of (children, people with disabilities, and elderly people), and who the main caregiver was. The second section was about the employer: their characteristics and employment situation. The aim was to understand to what extent household chores were delegated to the PDW (i.e. if PDW's employer had a full-time job themselves, it could be assumed that their time for house cleaning was less than those that do not have a paid job). The last section was about the domestic worker. To fully grasp the motivations for them to register in the social security scheme and the relation they held, the questions in this section included the time the PDW had been working for them, the type of tasks they performed, the PDW's family and socioeconomic context and the reasons for which they had (or had not) registered them to a social security regime. 19.4% of the respondents had registered their PDW.

Once I had collected the evidence of the roles, motivations, and relationship between PDW and their employers, the data analysis consisted in organizing it into the three categories of the analytical framework. For both beneficiaries and PDW, I answered the questions regarding the activities they were expected to undertake, the costs and benefits of engaging in the process and the power relations between them. Once roles, motivations, and relationships were made observable, I contrasted them to the theoretical expectations set in the analytical framework, and the implications this had for the implementation of the policy.

# 5. The regulatory arrangement for social policy expansion in Mexico: Roles, motives, and relationships between PDW and their employers in Mexico

In Mexico, 55.8% of the workforce has an informal employment: they lack social security, rendering them ineligible for contributory pensions or health services. While alternative public hospitals exist under the Federal Ministry of Health and State Health Services, they are insufficient to meet demand, lacking essential staff, equipment, and infrastructure. PDWs, a subset of this group, typically resort to subpar private medical facilities or pharmacy-affiliated clinics for primary health care. Due to prolonged waiting times and uncertainty about care, public hospitals are only sought in critical illnesses. Both scenarios lead to out-of-pocket expenses, adversely affecting family finances, especially considering the absence of contributory pensions. In 2020, 46.1% of individuals aged 65 or older lived below the Income Poverty Line (Coneval, 2021).

After two decades of having different groups advocating for PDW's rights, by the end of 2018 the Supreme Court determined that excluding them from the mandatory Social Security regime was discriminatory and violated their human rights. The Supreme Court thus mandated the creation of a "tailor-made" social security scheme that should be piloted, before making it mandatory (SCJN, 2019). The Social Security Institute (IMSS) was designated for undertaking this task as the institution responsible for the provision of social security to the employees of the formal private sector (WHO, 2017). Yet, although the pilot phase was supposed to last 18 months (from 2018 to 2020), the legislative reform was only passed by the end of 2022. From 2018 to 2022, it was optional for the employers of PDW to register them to the new social security regime.

The new regime was indeed tailored to PDW's needs and characteristics. The process for registering PDW's can be carried out online and very straightforward; they are entitled to benefits identical to the most generous regime; and the requisites are so basic, that public officials feared that other employers already registered in other (more expensive) regimes may change to this (P.O, pers.com. 2020). Yet, extending social security to domestic workers is not just a matter of passing a new law that mandates it. Instead, rules and administrative processes must operate swiftly at the organizational level to provide the intended beneficiaries with the information they need to enroll, as well as the back-end procedures for delivering the benefit: targeting, eligibility assessment, and service delivery as well as to enforce the regulation.

Informing PDWs of their new rights, enrolling them, and enforcing the new rule by monitoring its compliance are tasks that exceed the installed capacities of the Social Security Institute. The lack of a registry of PDW (or social registries in general) makes it impossible for the IMSS (or anyone) to reach this group of the population, let alone inform and enroll them into a new social security scheme. In Koenig-Archibugi and Macdonald's (2017) terms, this means that IMSS (R) lacks direct access to PDW (Indirect Target and beneficiaries [B]); it lacks direct means to inform them of their rights and the benefits associated to the new regime so that they can effectively change PDW's working conditions, and finally, it lacks the necessary means to gather information on compliance. The one person that does possess such access and resources is the PDW's employer (Intermediary [I]) who also has to register them and pay a monthly contribution (Target [T]).

Yet, the inclusion of intermediaries in a regulatory regime represents the kind of move that leads to complex forms of governance (Levi-Faur, 2011) in response to policy growth (Knill et al., 2023). Indeed, despite that the process for registering a PDW to the new regime entails a simple administrative task for employers (fill an online or in person format and pay) (IMSS, n.d.), after more than 4 years of the beginning of the pilot program, only 2% of the domestic workers in the country have been incorporated into the new regime. The low rates of PDW with social security "can partly be attributed to gaps in national labor and social security legislation, and partly to gaps in implementation" (ILO, 2021a). The regulatory arrangement where the new policy was to be implemented was characterized by a regulator (IMSS) that not only lacked the capacity to fully enforce the rule but also by beneficiaries and intermediaries with roles, motivations, and a relationship on their own.

In what follows, I show how beneficiaries and intermediaries adopt different roles, and act motivated by an assessment of the cost and benefits of engaging in a regulatory process, and by a pre-existing relationship between them (see a summary of the analysis in Table 2).

### 5.1. Roles and activities

As intermediaries, employers of PDWs interpret the new regulation and assess whether this is the best alternative for their employees: they assess whether PDWs are deserving of social security and, if so, if affiliating them to this new regime is the best way to provide it. In a country where 55.8% of the working population lacks social security (INEGI, 2023), among many of the employers of domestic workers in Mexico prevails the notion that social security is not a fundamental right. As one of the respondents put it: "There are many of us in this country who work and do not have social security, not even large companies provide it" (R96). The combination of a job that has traditionally been undervalued, along with the fact that workers "more deserving" in their eyes also lack social security, reinforces the notion that denying this right for domestic workers is not problematic (let alone illegal).

Yet, some employers do consider PDWs deserving of benefits related to social security. However, they seldom consider the new regime as the best alternative to provide it. In line with *Expectation 1*, employers resist the implementation of the new policy (see Ciornei et al., 2023), not so much because they disagree with the problem the policy is attempting to address (lack of a decent job for PDW), but with the selected strategy to address it (Prior & Barnes, 2011). This is evident when 137 out of the 170 respondents of the questionnaire declared that they decided not to register their domestic worker in the social security because she was already a beneficiary of the IMSS (by means of their husband or daughters/sons) (26.3%); she rather receives the amount of money equivalent to the employer's contribution (16%); she does not want to use the health services provided by the IMSS (2.9%) or because they already give her private insurance (1.5%).

On the other hand, the beneficiaries' role is not purely relational, but explained by their own motivations and capacity to act. PDW's role is influenced by the self-perception of conducting an undervalued job. This is

TABLE 2 Empirical manifestations of the interpretative intermediation process

	Role and activities	Motives	Relationship
	In what capacity do beneficiaries and intermediaries engage in the process? What activities are they expected to undertake?	What are the benefits of engaging in the process? What are the costs of doing so?	What is the power relationship between intermediaries and beneficiaries?
Intermediaries	Employers' decision to comply is influenced by their alignment with both the principles of the policy (PDWs deserve a decent job) and the regulator's strategy (registering to Social Security). Employers who agree with the strategy, register their PDW to social security.	Employers that agree that PDW's perform a real job find a way to decrease the costs of engaging in a "burdensome" bureaucratic procedure to provide their PDWs with social security.	Given the impossibility for PDW (or the IMSS) to make employers accountable, the employers' decision is not informed by a legal mandate but by the preexisting (paternalistic) relationship between them and their PDWs.
Empirical evidence from beneficiaries	Based on a perception of their job as undervalued, their limited negotiation power over working conditions and their very narrow understanding of how the IMSS works, PDWs seldom advocate for their rights.	Even if PDWs expect immediate benefits, the administrative burden they face goes beyond the registration process (accessing to health and social services at IMSS) increasing the expected costs of negotiating their registry to the social security regime, particularly if it entails risking their job by being replaced by other PDW.	

Source: Own elaboration.

reinforced by the acknowledgment of the very limited negotiation power they have over their working conditions (ILO, 2021a) because an oversupply of PDW in Mexico (8.7% of the economically active female population is dedicated to paid domestic work [ENOE\_T3\_2022]) and their reduced chances of finding another job with better conditions, given their limited formal education (44.6% completed only elementary school and 33.5%, secondary school; the average level of schooling of this population is 9.1 years [INEGI, 2015]). This is especially true for PDW who identify themselves as indigenous people (60% of the surveyed PDW) who earn the minimum wage or less (\$187 US per month) and seldom speak Spanish, making it even more difficult for them to understanding and negotiate the terms of their hiring and their salary (COPRED, 2021).

Furthermore, they find it difficult to understand how the tripartite social security system works, that is, that employers, employees and the IMSS contribute to fund social security benefits. As one of the employers of a PDW interviewed said "I explained to her... They do find it very difficult to understand that a portion of their salary has to be withheld. [With the implementation of this new scheme] this is going to be a tremendous problem" (S.C, pers.com. 2020). Also, once registered, they have to conduct bureaucratic processes they are not familiar with for them or their family to get access to benefits such as health services or day-care for their children. In line with the *Expectation 2*, although PDW recognizes that their participation in the labor market should entail the same rights as any other job (INEGI, 2017), they are aware that the possibility for them to demand them is limited by their disadvantaged position within a labor negotiation (ILO, 2021b), but also by their disadvantaged position regarding the complex IMSS bureaucracy. 18.2% of domestic workers belong to or identify with an indigenous people or community and all of them are women.

### 5.2. Motivations

As any person, before actually engaging in a new program, employers of PDW assess the complexity of the process of registering their PDW and making the monthly payments. In terms of the perceived costs of the process,

Mexican bureaucracy is infamous for its inefficiencies and burdensome and systematically unpredictable administrative procedures (Peeters & Nieto-Morales, 2021). This is especially true of its public health system: there is a widespread perception among the population that accessing primary health care at the Institute for Social Security (IMSS) is time-consuming and their services lack quality (INSP, 2012). As one of the respondents put it:

It is also important to consider the complications of bureaucratic procedures. All the people I know who have attempted to register these workers have faced this type of restriction. The documentation [the IMSS] requests, the records that are often not so simple for [the domestic workers] to gather (...). It is not that their work is not valued and their labor rights are not recognized, it is also a matter of administrative restrictions. (S.C, pers. Comm., 2020)

This perception remains even when the requirements for registering domestic workers are fewer, and the process for paying the monthly contributions is much simpler than that for any other type of employee in other regimes (ILO, 2021b). This is partly because, as Baekgaard and Serritzlew (2016) explain, citizens' interpretation of the information regarding the performance of public services is biased, since it is contingent on prior beliefs. Despite the efforts (from the IMSS, complying with an explicit instruction from the Supreme Court) to design an administratively simple regime, the notion that this process (or any involving the IMSS) is complex prevails among employers. This interpretation suggests that more and better information on how the program works does not automatically result in more employers registering their domestic workers. As Baekgaard and Serritzlew's (2016:73) put it, "the information that is inconsistent with prior beliefs is less likely to be interpreted correctly than belief-consistent information."

While these tasks are left for the employers of PDWs, no apparent benefit for the employers can be drawn from the current regulatory arrangement. This explains why 43% of the respondents of the questionnaire stated that the main reason for which they had not registered their PDW to social security was because they only worked at their houses once or twice a week. Indeed, as stated in *Expectation 3*, the combination of high costs and low benefits with the fact that employers do not consider that PDW are entailed to social security because "they are part of the family," explains the motivations for employers not to register them. Being "part of the family" does not only mean that they are not perceived as workers, but also that the tasks they perform are not "a real job." Empirically this becomes clear when the employers do not register them arguing that "they do not see them as workers" (M.D., pers. com., 2020), "let alone if they only come [to] work a few days a week [not daily]" (V.M., pers. com., 2020).

Yet, some employers have registered their domestic workers despite that they believe that engaging with the IMSS is complex and burdensome. They did so not because it was mandatory (some of them registered them when it was voluntary), but because "it is a labor right" (90% of the respondents that had registered their PDW). In many of these cases, employers found a way to sort out the costs of engaging with the IMSS: among the respondents that had registered their domestic workers to social security, 21% resorted to a middleman (gestor) to do so, or opted to register them as cleaning staff of their own companies because, although it is economically more expensive, it is a process that is done by others (i.e., the accountant or the human resources department). In line with Expectation 3, for them to engage in such a burdensome process was deemed worthy because doing so is compatible with their principles.

On the beneficiary side, their motivations are also preceded by an assessment of the costs in which they would incur if they participate in the program against the benefit they would get (Daigneault & Macé, 2020). Enrolling in programs such as public health insurance entails bearing the costs immediately, whereas the benefits would be received in the future, if ever (Currie, 2004). Therefore, while for PDWs the benefits of enrolling are far from being immediate and tangible, the costs of enrolling are permanent and immediate in two ways.

First, even if at one point in time employers agreed to enroll their PDW, this agreement has to be renegotiated every month. Indeed, during the pilot phase of the social security scheme PDWs faced many difficulties when trying to navigate the online platform to register themselves to the Social Security scheme and conducting the following steps (going to a financial institution to pay their employers' monthly contributions); therefore, the IMSS redesigned the process and make the employers responsible for undertaking these tasks. As a result, social security enrollment becomes a perpetual bargaining chip. Hence, although intermediaries were originally brought to the regulatory process by the regulator as a way to cope with the overburden and lack of capacity

to implement the policy, in practice they also satisfy PDW's needs. This has traditionally been like that. In fact, to the eyes of most PDW (64% of the PDW surveyed), safety work conditions entail a working setting where their employers are attentive to their needs (COPRED, 2021). Either to enroll them to social security or to help them with personal concerns, PDWs rely on their employers to meet their own needs.

Second, in the cases where the benefits of being registered are likely to be immediate (i.e., get medicines or a surgery), they still have to face the costs of engaging with a bureaucracy that they do not know how to deal with. One employer, who has already registered the PDW to the new regime, reported that the PDW has been facing difficulties while registering her parents as her beneficiaries so they can get the medicines they need, because "everyone at the IMSS' clinic tells her a different story. Someone told her that she had to go to the clinic that corresponds to her parents' home address, but then she went there and they told her to go to the clinic that corresponds to her home address, and then someone told her that [registering her parents as beneficiaries] was simply not possible. But is it, right? I told her 'Maribel, don't give up. It is possible and it's your right. Tell them that it can be done'." (R.J., pers. com., 2023). This situation showcases Expectation 4, since the administrative illiteracy of PDW raises the cost for them to enroll in the new regime, despite being aware of the benefits of doing so.

# 5.3. Relationship

When beneficiaries are "represented" by someone else (regulators, targets, or intermediaries), a social relationship between the beneficiary and their representative tends to be characterized by intense interaction (Koenig-Archibugi & Macdonald, 2017). This is precisely the case of PDW's employers, who hold a close relationship with their PDW: they share an intimate physical space while belonging to different worlds, each pertaining to a different social class. Unsurprisingly, many employers refer to domestic workers as persons who are "part of the family." In turn, a formal labor relation that could protect domestic workers from power inequalities (Blofield & Jokela, 2018) is instead dominated by a paternalistic relation where "edification and protection behaviors [are] adopted (...) by employers in relation to workers and with explicit reference to parent–child relations." (Gibbon et al., 2014: 167).

When PDWs' employers acting as intermediaries are called to interpret the regulatory program, they also bring "their own subjective concerns and meanings to bear in determining what action to take in specific circumstances, at specific times and in specific places" (Prior & Barnes, 2011: 267). Such judgment is influenced by the paternalistic relationship between employers and PDWs, whereby they are seen as "part of the family" more than as employers. Eighty-seven out of the 170 respondents of the questionnaire said they agreed or strongly agreed with the statement that their domestic worker "is like family. I help her with what I can (for example, I buy medicine when she needs it, I help her to pay for her studies, or I help her to cover the expenses related to her children/parents)." Even among some of the employers who have registered their domestic workers to social security, paternalistic reasoning underlies. Almost one in every 10 employers that registered their domestic workers argue that they did so because they wanted to help them given the particular circumstances they were facing (i.e., they were pregnant, their parents were sick and needed some medicines, they were old or they were lonely).

Conversely, the decision to register PDW to social security seldom came from a demand from PDW to their employers. And, even in such cases, the oversupply of PDW in Mexico limits their leverage in any labor negotiation. As predicted in *Expectation 5*, the impossibility to make employers accountable for their role as targets leaves them with plenty of discretion to hire someone else that is willing to perform that job without demanding social security. This shifts the balance of power in favor of employers.

Expectation 6 was not observed in this case, since there were no instances where beneficiaries served as a check on the intermediaries behavior. In part, this is so because the paternalistic nature of the PDW-employer relationships is also endorsed (and perpetuated) by PDWs themselves. From the perspective of PDWs, demanding their right to social security is not an easy task. Although among the interviewed PDWs the work they perform is seen as one that is carried out as part of a labor relation, in practice they allow practices that are anchored in a paternalistic relationship. "Sometimes [the employer] came back until 11 at night and I had to wait there, taking care of the children... [but I didn't quit] because she was good to me: she lent me money when I needed it, or sometimes when I got sick, she bought me the medicines" (T., pers. comm., 2020). PDWs' "permissive" behavior with respect to some of their employer's actions is rewarded with "tokens" of their kindness that

can go from higher than the average payrolls, to payments in kind, or to tolerate actions that other employer might not (for instance, taking their own children to their workplace when they cannot attend school for some reason).

The findings of the analysis are summarized in Table 2.

### 6. Discussion

The literature on policy growth deals with the effects on the overburdened organizations in charge of implementing ever-growing and more complex policy stocks (Adam et al., 2019; Knill et al., 2023). By focusing on intermediation as one of the most common strategies for coping with the necessity to satisfy a new regulatory mandate without new administrative capacities, this study unbundles the mechanisms at work in the case of intermediaries that are also a target of the regulation, thus making three main contributions to the literature on policy growth and regulatory intermediaries.

First, as suggested by Abbott et al. (2021), the fact that the behavior of intermediaries is informed by the risks and rewards of their different loyalties was also evident in the case of PDW and their employers. By introducing the dimension of the administrative burden into the analysis of the intermediaries-beneficiaries assessment of the cost and benefits, this study provides a more nuanced understanding of the motivations of the actors involved. The analysis puts in perspective the weight such rewards have for both the intermediaries and beneficiaries in pursuing the principles they are loyal to, showing that the loyalty of intermediaries is not absolute.

Second, in cases where targets are unaccountable, the cost for noncompliance is minimal. Yet, as shown in the case analyzed, there are targets that nonetheless comply with the regulation. This suggests that, when intermediary-targets are unaccountable their willingness to comply with burdensome regulatory policies is not a function of maximizing utility; this decision is also mediated by their relation with the beneficiary. In such cases, what is at stake is not whether intermediary-targets use the ample room for discretion to comply or not with the regulation, but how suitable they find the "solution" the regulation puts forward. This complements the arguments suggesting that intermediaries motivations are informed by the congruency between the policy goals and their value system (Abbott et al., 2021; Ciornei et al., 2023; Euchner & Zeegers, 2022): intermediaries may agree with policy goals but not with the means to attain them.

Finally, the literature on the involvement of beneficiaries as actors in the intermediation process recognizes their significance in shaping policy implementation (Abbott et al., 2017; Koenig-Archibugi & Macdonald, 2017). However, the current explanation is limited to the role of intermediaries and attributes compliance to their performance, ignoring the mechanisms by which the interaction between intermediaries and beneficiaries affects outcomes. This study aims to enhance our understanding of how these relationships impact the role of intermediaries. It suggests that intermediaries' assessments of regulatory policies and the costs and benefits of compliance are influenced by their connection with beneficiaries and their ability to advocate for their entitled benefits.

# 7. Conclusions

The most recent literature on policy growth and regulatory intermediaries sees the latter as agents that are in a better position (more capable) than the regulator itself to enforce a new policy (Abbott et al., 2017), given the ever-growing policy accumulation (Adam et al., 2019; Zink et al., 2024). In this paper, I have argued that in order to understand the dynamics of the intermediation process, beneficiaries' roles, motivations, and relationships with other actors of the regulatory process are as crucial as that of the intermediaries/targets.

By offering a characterization of both intermediaries and beneficiaries, I show that they affect the implementation of policies in which the decision for complying is not exclusive to the target groups. This is the case with many policies aimed at providing labor benefits for workers performing in the informal economy, where it is unclear to whom their employers are accountable. The analytical framework that I present allows for empirically observing how both intermediaries and beneficiaries' behavior explains regulatory compliance, and policy implementation in general. This paper contributes to the study of regulatory regimes where new labor policies are seeking to guarantee decent working conditions where (1) there is an intended beneficiary of the regulation (workers)

and (2) the direct targets of regulation are the employers and implicitly, they also act as intermediaries themselves.

The main conclusion that can be drawn from the analysis presented in the previous section is that whenever intermediaries and beneficiaries intervene in a policy, they affect the implementation arrangement by challenging the assumptions upon which the policy's theory of change rests. From the perspective of the regulator, it was reasonable to expect that employers would be willing to provide better conditions for their workers as long as doing so did not entail burdensome costs (economic, administrative) for them to bear. This makes them the perfect candidate for acting as an intermediary: they can access a dispersed and difficult-to-reach target population; because they have an intimate relation with them, they can care for them, and finally, by doing so they would not incur high economic costs (see Abbott et al., 2017). And it is precisely on this premise that the policy for formalizing domestic workers in Mexico is based: enrolling domestic workers involves a simple administrative procedure, the employers' contribution is the lowest among all social security regimes, and the social benefits that make up the regime for domestic workers are as generous as the best existing regimes in Mexico. Yet, the beneficiaries' perspective is excluded from such calculus. Unsurprisingly, the rate of PDWs' enrolment is extremely low.

Extending the RIT framework to the study of the intermediary-target dual role and beneficiaries' role in implementation makes it evident that the motivations are not the same as those considered in the theory of change of the regulatory program. Thus, when it comes to social security policies targeting a group of the population that has been traditionally considered undeserving of social policy, it is not only a matter of lessening the costs (economic or administrative) that either the employer or the employee have to bear, nor is it a question of making the benefit so appealing to offset the costs of getting it. Instead, when the intermediary and the beneficiary engage in the regulatory process, what is altered is the existing relationship between them. There is a pre-existing relationship that functions in a particular manner between them: certain costs and certain benefits already exist for both parties and are already allocated. These are the costs and benefits against which the new regulation competes with. Consequently, from the intermediaries' perspective, they are not deciding between complying or not; they are weighing whether it is more convenient (for both) to register them for social security or to keep providing them with what they "actually" need when they need it. From the beneficiaries' perspective, they are not deciding between keeping a precarious and undervalued job and getting a better one; they are considering if a long-term benefit is worth risking their precarious but only possible job.

This study adds to the recent literature devoted to exploring the intricacies of the implementation process showing that it hinges not only on governments' willingness to adhere to new policy mandates. It supports the argument that implementation depends on the institutional arrangement where policy is to be deployed (see Zink et al., 2024) and the complexity of the implementation task at hand (see Haag et al., 2024), but also on the dynamic interaction of the actors involved in deploying the organizational strategies chosen by implementing agencies to navigate these demanding conditions.

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# Data availability statement

The data that support the findings of this study are openly available in Github at https://github.com/CynthiaLMS/Intermediary-Beneficiary-Interaction-Shaping-Policy-Implementation.git.

#### **Endnote**

While Kourula et al. (2019), include "resources" as part of the elements involved in the process in this analytical framework, I conceive them as part of the motivations that lead people to partake in a process since individuals' resources set the basis against which a person assess the costs and benefits of engaging in a particular program.

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# **Supporting information**

Additional Supporting Information may be found in the online version of this article at the publisher's web-site:

**Data S1:** Supporting Information.