Step 1 — Extract All Requirements for Process inflation (§ 1)

Requirement 1: Ved valg mellom ulike tolkingsalternativer skal den løsningen som best fremmer lovens formål velges. **Source:** R-35 § 1 / PROC-REQ-1.1

Requirement 2: Tjenestene skal bidra til å oppnå formålene i loven, og skal så langt som mulig utformes i samarbeid med mottakeren. **Source:** R-35 § 1 / PROC-REQ-1.2

Requirement 3: Hvordan Nav-kontoret på best mulig måte kan gi slik hjelp, må vurderes konkret og individuelt ut fra alle virkemidlene kontoret rår over. **Source:** R-35 § 1 / PROC-REQ-1.3

Requirement 4: Nav-kontoret skal særlig være oppmerksom overfor personer med liten sosial tilknytning, personer i overgangs- eller etableringsfaser og barn og unge i vanskeligstilte familier. **Source:** R-35 § 1 / PROC-REQ-1.4

Requirement 5: Barn og unge er spesielt sårbare i vanskelige situasjoner, og Nav-kontoret må sørge for at deres særskilte behov blir ivaretatt i familiens møte med kontoret. **Source:** R-35 § 1 / PROC-REQ-1.5

Requirement 6: Når en tjeneste gis til flere personer, skal tjenestetilbudet vurderes opp mot formålene i loven for hver enkelt mottaker. **Source:** R-35 § 1 / PROC-REQ-1.6

Requirement 7: For eksempel skal tildeling av økonomisk stønad til en familie vurderes i samsvar med formålene for hvert enkelt familiemedlem i tillegg til familien som helhet. **Source:** R-35 § 1 / PROC-REQ-1.7

Requirement 8: Barnekonvensjonen forplikter Nav-kontoret til å sikre at barnets beste er et grunnleggende hensyn ved alle handlinger og avgjørelser som berører barn. **Source:** Kommunebrev 2025 / PROC-REQ-1.8

Requirement 9: Det betyr at det alltid må foretas en konkret og individuell vurdering i hver enkelt sak. **Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / PROC-REQ-1.9

Requirement 10: En vurdering av barnets beste innebærer å vurdere hva som er barnets beste i denne sammenhengen... vekte hensynet opp mot andre hensyn... vise innholdet i barnets beste-vurderingen og forklare vektingen. **Source:** Barnets beste - veileder / PROC-REQ-1.10

Requirement 11: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. **Source:** Barnets beste - veileder / DOC-REQ-1.1

Requirement 12: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. **Source:** Barnets beste - veileder / DOC-REQ-1.2

Requirement 13: Det må foreligge opplysninger i saken som dokumenterer om søker har et hjelpebehov eller ikke. **Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.3

Requirement 14: ...kan også være muntlig, og skrives ned i journalnotat av NAV-kontoret. **Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.4

Requirement 15: Nav-kontoret har plikt til å nedtegne muntlige søknader. **Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.5

Requirement 16: og dette tidspunktet skal fremgå av saken. **Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.6

Requirement 17: skal det i vedtaket som fattes om denne tjenesten fremgå hva som er gitt av opplysning, råd og veiledning. **Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.7

Requirement 18: skal det skrives et avslutningsnotat, eventuelt et avslutningsbrev som informasjon til brukeren. **Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.8

Requirement 19: Hva som er gjort og hvilke løsninger som er valgt skrives i et avslutningsnotat. **Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.9

Requirement 20: Arbeidsgiver skal kartlegge og dokumentere risiko ved arbeidet som, hver for seg eller samlet, kan gi risiko for vold og trusler i alle former for brukermøter. **Source:** Standard for trygge brukermøter i NAV / DOC-REQ-1.10

Requirement 21: Alle etablerte sikkerhetstiltak skal dokumenteres, og gjøres tilgjengelig for alle ansatte ved enheten. **Source:** Standard for trygge brukermøter i NAV / DOC-REQ-1.11

Step 2 — Classify Each Requirement

Requirement 1 Classification: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The finding notes that this establishes a classical legal rule of statutory interpretation guiding the application of the law's standard-discretion to advance its stated aims. *Note: Will not proceed to Step 3.*

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding identifies this as imposing an administrative method involving a "user co-design obligation" regarding how services are structured.

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding states this requirement dictates the specific administrative "assessment methodology" the office must utilize to evaluate how to best provide assistance.

Requirement 4 Classification: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The finding categorizes this as substituting fixed substantive sub-criteria for the open normative

term "vanskeligstilte," thereby defining exactly who qualifies for protection. *Note: Will not proceed to Step 3.*

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding describes this as mandating a "concrete outcome-ensuring obligation in a specific context," explicitly governing the administrative handling of children in family meetings.

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding specifies this establishes a "discrete mandatory assessment procedure specific to multi-recipient service scenarios" governing the process of service delivery.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding identifies this as regulating the specific administrative "methodology for allocating financial assistance" by requiring a two-level assessment process.

Requirement 8 Classification: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The finding recognizes this as an independent legal duty establishing a substantive human rights threshold (the best interests of the child) anchored in international law. *Note: Will not proceed to Step 3.*

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding characterizes this requirement as imposing an absolute procedural obligation regarding the "evidence-discretion — how factual and needs assessment is conducted".

Requirement 10 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding states this replaces an open normative term with a "fixed, sequentially ordered three-step procedural framework" dictating the administrative steps for an assessment.

Requirement 11 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding explicitly defines this as an absolute "mandatory documentation obligation" affecting the administrative component of service delivery.

Requirement 12 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding describes this requirement as establishing specific "content standards for case file entries relating to children," clearly an administrative documentation rule.

Requirement 13 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding classifies this as an absolute documentation requirement dictating how "proof of need is assembled in case files".

Requirement 14 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding confirms this requirement regulates the "administrative handling and recording of verbal submissions" within journal notes.

Requirement 15 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding explicitly categorizes this as establishing an absolute duty concerning the "method of receiving and recording verbal applications".

Requirement 16 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding identifies this rule as mandating a "specific case file content item" (a timestamp) in administrative records.

Requirement 17 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding documents this as a procedural requirement mandating specific content details to be included in formal administrative decisions ("vedtak").

Requirement 18 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding describes this requirement as creating a mandatory administrative step relating to "documentation procedures at service closure".

Requirement 19 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding records this requirement as dictating the "specific content required in a closing note at service conclusion".

Requirement 20 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding explicitly defines this as an administrative "employer safety documentation" obligation regarding occupational risk mapping.

Requirement 21 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding classifies this mandate as another "employer safety documentation" rule regarding the recording and availability of safety measures.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** R-35 § 1 / PROC-REQ-1.2 **Circular/Source:** R-35 § 1 / PROC-REQ-1.2 **Nature of Procedural Requirement:** Services must be designed in cooperation with the recipient as far as possible. **Legal Gap:** Introduces a specific user co-design methodology/obligation that is not prescribed within the text of § 1, which leaves service design methods entirely open. **Thematic Category:** [OTHER] (Cooperative service design procedure)

Requirement Reference: 3 **Finding Reference:** R-35 § 1 / PROC-REQ-1.3 **Circular/Source:** R-35 § 1 / PROC-REQ-1.3 **Nature of Procedural Requirement:** The office must assess concretely and individually how to best provide assistance from all available means. **Legal Gap:** The law's permissive framing regarding a capacity to give help is converted into a mandatory assessment methodology, thereby eliminating the office's discretion to determine its own assessment approach. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** R-35 § 1 / PROC-REQ-1.5 **Circular/Source:** R-35 § 1 / PROC-REQ-1.5 **Nature of Procedural Requirement:** The office must ensure children's specific needs are taken care of during family meetings with the office. **Legal Gap:** Escalates the law's broad directional goal of "contributing to" service provision into a concrete, context-specific outcome-ensuring obligation during family meetings. **Thematic Category:** [USER-COMM]

Requirement Reference: 6 **Finding Reference:** R-35 § 1 / PROC-REQ-1.6 **Circular/Source:** R-35 § 1 / PROC-REQ-1.6 **Nature of Procedural Requirement:** When service is provided to a group, it must be assessed against the law's purposes for each individual recipient. **Legal Gap:** Converts a general individual value reference in § 1 into a specific, mandatory assessment procedure governing multi-recipient service contexts. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** R-35 § 1 / PROC-REQ-1.7 **Circular/Source:** R-35 § 1 / PROC-REQ-1.7 **Nature of Procedural Requirement:** Financial assistance to a family must be assessed both for each individual member and for the family as a whole. **Legal Gap:** Submits the open purpose of contributing to financial security to a fixed, mandatory two-level (per-member and per-family) assessment methodology absent from § 1. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** Veileder om økonomisk stønad etter sosialtjenesteloven / PROC-REQ-1.9 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / PROC-REQ-1.9 **Nature of Procedural Requirement:** A concrete and individual assessment must always be carried out in every single case. **Legal Gap:** The absolute "always must" requirement eliminates any contextual flexibility that would otherwise exist under § 1's open evidence-discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** Barnets beste - veileder / PROC-REQ-1.10 **Circular/Source:** Barnets beste - veileder / PROC-REQ-1.10 **Nature of Procedural Requirement:** Best interest assessments must follow a three-step sequence: assess the best interests, weigh against other considerations, and demonstrate/explain the weighting. **Legal Gap:** Substitutes the open normative standard of a "comprehensive and coordinated service offer" with a fixed, sequentially ordered three-step procedural framework. **Thematic Category:** [SEQUENCE]

Requirement Reference: 11 **Finding Reference:** Barnets beste - veileder / DOC-REQ-1.1 **Circular/Source:** Barnets beste - veileder / DOC-REQ-1.1 **Nature of Procedural Requirement:** Best interest assessments must be documented for verification purposes. **Legal Gap:** Mandates an absolute documentation obligation in an area where § 1 is fully silent and entirely leaves how-discretion open. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** Barnets beste - veileder / DOC-REQ-1.2 **Circular/Source:** Barnets beste - veileder / DOC-REQ-1.2 **Nature of Procedural Requirement:** Entries regarding a child must be neutrally descriptive and strictly limited to what is necessary. **Legal Gap:** Imposes documentation and case-file content standards despite § 1 being completely silent on administrative case file content and neutrality requirements. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.3 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.3 **Nature of Procedural Requirement:** Case files must document whether the applicant has a need for help or not. **Legal Gap:** Creates an absolute obligation dictating what must be present in the case file when § 1's evidence-discretion is completely open and non-prescriptive regarding documentation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 14 **Finding Reference:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.4 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven / DOC-REQ-1.4 **Nature of Procedural Requirement:** Verbal applications must be recorded in a journal note by the NAV office. **Legal Gap:** Creates a specific recording requirement (albeit conditionally applied) that lacks procedural anchoring within the open framework of § 1. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.5 **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.5 **Nature of Procedural Requirement:** The NAV office has a duty to record verbal applications. **Legal Gap:** Establishes a non-derogable, unconditional procedural duty regarding the administration of applications in an area where § 1 provides open how-discretion. **Thematic Category:** [DOC-REQ]

Requirement Reference: 16 **Finding Reference:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.6 **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.6 **Nature of Procedural Requirement:** The case file must show the timestamp of an application. **Legal Gap:** Mandates a highly specific case file content item in an area where § 1 contains no documentation requirements and how-discretion remains completely open. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.7 **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.7 **Nature of Procedural Requirement:** The formal decision (vedtak) must contain what information, advice, and guidance was given. **Legal Gap:** Converts an open normative term into a rigid mandate regarding the exact content that must legally be recorded in formal administrative decisions. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.8 **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.8 **Nature of Procedural Requirement:** A closing note or letter must be written and shared with the user at the conclusion of a service. **Legal Gap:** Mandates an absolute procedural closing step and document in an area where § 1 affords open how-discretion and is entirely silent on service conclusion protocols. **Thematic Category:** [DOC-REQ]

Requirement Reference: 19 **Finding Reference:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.9 **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-1.9 **Nature of Procedural Requirement:** The closing note must document what actions were performed and what solutions were chosen. **Legal Gap:** Converts the open discretionary space of service administration into a precise, fixed-content documentation mandate at closure, lacking any valid statutory anchor. **Thematic Category:** [DOC-REQ]

Requirement Reference: 20 **Finding Reference:** Standard for trygge brukermøter i NAV / DOC-REQ-1.10 **Circular/Source:** Standard for trygge brukermøter i NAV / DOC-REQ-1.10 **Nature of Procedural Requirement:** Employers must document and map risks that may lead to violence and threats during user meetings. **Legal Gap:** This administrative mandate operates independently on the basis of AML occupational safety regulations, rendering § 1 only a thematic anchor rather than a true statutory source for the documentation requirement. **Thematic Category:** [DOC-REQ]

Requirement Reference: 21 **Finding Reference:** Standard for trygge brukermøter i NAV / DOC-REQ-1.11 **Circular/Source:** Standard for trygge brukermøter i NAV / DOC-REQ-1.11 **Nature of Procedural Requirement:** All safety measures must be documented and made available to all employees. **Legal Gap:** The legal mandate strictly derives from an independent occupational safety regulation (Forskrift om utførelse av arbeid), completely bypassing the administrative discretion of § 1. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 2)

Requirement 1: Hvis det er tvil om en person er å anse å ha fast bopel, må Nav-kontoret foreta en konkret individuell vurdering. Source: R-35, § 2, punkt 1.2.1.1 (PROC-REQ-2.1)

Requirement 2: I denne helhetsvurderingen kan det blant annet legges vekt på om personen er folkeregistrert i Norge, har ektefelle og eventuelt barn bosatt i Norge... Source: R-35, § 2, punkt 1.2.1.1 (PROC-REQ-2.2)

Requirement 3: Nav-kontoret må gjøre en konkret og individuell vurdering av oppholdsgrunnlaget. Source: R-35, § 2, punkt 1.2.2.2 (PROC-REQ-2.3)

Requirement 4: Hvis en person har oppholdsgrunnlag som nevnt over må det gjøres en konkret og individuell vurdering av om personen har fast bopel. Source: R-35, § 2, punkt 1.2.2.2 (PROC-REQ-2.4)

Requirement 5: Nav-kontoret kan kreve at en person dokumenterer lovlig opphold. Source: R-35, § 2, punkt 1.2.2.6 (DOC-REQ-2.1 / PROC-REQ-2.5 — consolidated)

Requirement 6: Nav-kontoret må på selvstendig grunnlag foreta en vurdering av om en søker har dokumentert lovlig opphold på søknadstidspunktet. Source: R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.6)

Requirement 7: Personer som ikke er i besittelse av pass eller lignede reisedokument, må fremvise vedtak fra utlendingsmyndighetene. Source: R-35, § 2, punkt 1.2.2.6 (DOC-REQ-2.2)

Requirement 8: Nav-kontoret må i hver enkelt sak etterspørre den dokumentasjon som er nødvendig for å vurdere om en EØS-borger har oppholdsrett. Source: R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.7 / DOC-REQ-2.3 — consolidated)

Requirement 9: Hvis EØS-borgeren ikke fremlegger dokumentasjonen som etterspørres... skal Nav-kontoret likevel vurdere EØS-borgerens oppholdsstatus med bakgrunn i sannsynligheten av opplysningene som er gitt. Source: R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.8)

Requirement 10: Endringen innebærer at Nav-kontorene ikke skal vurdere fast bopel for EØS-borgere som har dokumentert lovlig opphold som arbeidstaker, selvstendig næringsdrivende, tjenesteyter, student og opphold på egne midler... Source: Kommunebrev 2025, § 2 (PROC-REQ-2.9)

Requirement 11: Når en EØS-borger oppsøker Nav-kontoret, må Nav-kontoret kartlegge om vedkommende har et registreringsbevis og hva som eventuelt er oppholdsgrunnlaget i registreringsbeviset. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (PROC-REQ-2.10 / DOC-REQ-2.4 — consolidated)

Requirement 12: Uavhengig av hva som var grunnlaget for oppholdet på registreringstidspunktet, må EØS-borgeren dokumentere at han har lovlig opphold... på søknadstidspunktet for sosiale tjenester. Source: Veileder EØS-borgere (DOC-REQ-2.5)

Requirement 13: Dersom vedkommende arbeider under 10 timer per uke må Nav-kontoret etterspørre dokumentasjon knyttet til arbeidsforholdet og på bakgrunn av denne foreta en konkret helhetsvurdering. Source: Veileder EØS-borgere (PROC-REQ-2.11)

Requirement 14: Dersom EØS-borgeren oppgir at han har lovlig opphold som arbeidstaker, og at han fortsatt er i arbeid, men at han ikke tjener tilstrekkelig til å forsørge seg selv, må han dokumentere at oppholdsgrunnlaget fortsatt står ved lag. Source: Veileder EØS-borgere (DOC-REQ-2.6)

Requirement 15: Dersom EØS-borgeren oppgir at han er selvstendig næringsdrivende må vedkommende dokumentere at ervervsvirksomheten er reell og at oppholdsgrunnlaget står ved lag. Source: Veileder EØS-borgere (DOC-REQ-2.7)

Requirement 16: Dersom vedkommende anfører at han har hatt rimelig grunn [til å si opp], må dette dokumenteres, for eksempel gjennom attest fra lege. Source: Veileder EØS-borgere (DOC-REQ-2.8)

Requirement 17: I vurderingen skal det legges vekt på antall arbeidstimer per uke og lønnens størrelse, om personen har rett til betalt ferie og rett til fortsatt lønn ved sykdom... Source: Veileder EØS-borgere (PROC-REQ-2.12)

Requirement 18: I vurderingen må det legges vekt på dokumentasjon i form av legeattest. Source: Veileder EØS-borgere (DOC-REQ-2.9)

Requirement 19: For at en EØS-borger skal anses å være midlertidig arbeidsufør, må det gjøres en helhetsvurdering med utgangspunkt i situasjonen på søknadstidspunktet. Source: Veileder EØS-borgere (PROC-REQ-2.13)

Requirement 20: I slike tilfeller må EØS-borgeren fremlegge dokumentasjon på opptak til yrkesrettet utdanning. Videre må EØS-borgeren gi en kort redegjørelse for sammenhengen mellom utdanningen og hans tidligere arbeid. Source: Veileder EØS-borgere (DOC-REQ-2.10)

Requirement 21: Familiemedlemmet må dokumentere overfor Nav-kontoret at vilkårene er oppfylt for å kunne anses å fortsatt ha lovlig opphold i Norge i sosialtjenestelovens forstand. Source: Veileder EØS-borgere (DOC-REQ-2.11)

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the administrative process of conducting a concrete individual assessment when doubt exists regarding a person's permanent residence.

Requirement 2: [PROCEDURAL/DOCUMENTATION] Justification: This requirement guides the casework process by listing specific factors (such as national registry status or family) that can be emphasized during the assessment. Ambiguous — recommend human legal review.

Requirement 3: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the administrative step of conducting an individual assessment of the basis of residence.

Requirement 4: [PROCEDURAL/DOCUMENTATION] Justification: This requirement imposes a sequential assessment procedure for determining permanent residence for persons with specific residence bases.

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates administrative form by permitting the caseworker to demand documentation of legal stay.

Requirement 6: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates an independent evaluation procedure caseworkers must perform specifically at the time of application.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Justification: This requirement demands the production of specific administrative forms (decisions from immigration authorities) if a passport is absent.

Requirement 8: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates an absolute procedural step of requesting necessary documentation in every single case involving an EEA citizen.

Requirement 9: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates a procedural fallback mechanism to assess probability when requested documentation is not provided.

Requirement 10: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates administrative process by instructing caseworkers to skip the permanent residence assessment step for certain EEA categories.

Requirement 11: [PROCEDURAL/DOCUMENTATION] Justification: This requirement mandates an initial step-by-step procedure to map and document the user's registration certificate upon first contact.

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the evidentiary process by placing the burden on the user to document their legal stay exactly at the time of application.

Requirement 13: [PROCEDURAL/DOCUMENTATION] Justification: This requirement establishes a sequential procedure to request documentation and perform an assessment if a quantitative working hour threshold is triggered. Ambiguous — recommend human legal review.

Requirement 14: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates that specific evidentiary records must be produced to prove ongoing residence basis when income is insufficient.

Requirement 15: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the production of evidentiary records regarding the reality of business activity for self-employed individuals.

Requirement 16: [PROCEDURAL/DOCUMENTATION] Justification: This requirement specifies the administrative need for documentary evidence, suggesting a specific form such as a doctor's certificate.

Requirement 17: [PROCEDURAL/DOCUMENTATION] Justification: This requirement mandates that specific enumerated economic factors must be evaluated within the assessment process. Ambiguous — recommend human legal review.

Requirement 18: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates that a specific evidentiary document type (a medical certificate) must be given weight in the administrative evaluation.

Requirement 19: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates a holistic evaluation procedure fixed temporally to the point of application.

Requirement 20: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the administrative form of documentation by mandating both proof of enrollment and a short written narrative.

Requirement 21: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates process by placing the documentation burden on a family member to prove conditions are met.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.1.1 (PROC-REQ-2.1) **Nature of Procedural Requirement:** The Nav office must conduct a concrete, individual assessment if there is doubt about a person having permanent residence. **Legal Gap:** § 2 authorizes the King to limit the law for persons without "bopel," but it does not itself impose a duty on Nav to conduct individual residence assessments. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.1.1 (PROC-REQ-2.2) **Nature of Procedural Requirement:** The caseworker may emphasize specific listed factors (e.g., national registry, spouse, children) during the holistic assessment. **Legal Gap:** § 2 mentions "bopel i riket" as a restriction ground but provides no criteria for what constitutes it; the specific enumerated factors lack any textual basis in § 2. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.2 (PROC-REQ-2.3) **Nature of Procedural Requirement:** The Nav office must make a concrete and individual assessment of the basis for residence. **Legal Gap:** § 2 authorizes the King to issue regulations but does not itself mandate Nav's assessment procedure for specific residence bases. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.2 (PROC-REQ-2.4) **Nature of Procedural Requirement:** An

individual assessment of permanent residence must be conducted for persons with specific residence bases. **Legal Gap:** § 2 uses "bopel i riket" as a ground for restriction but does not itself require Nav to conduct an individual permanent residence assessment. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.6 (DOC-REQ-2.1 / PROC-REQ-2.5 — consolidated) **Nature of Procedural Requirement:** The Nav office can demand that a person documents their legal stay. **Legal Gap:** The requirement is supported by the general investigation duty in fvl. § 17, but § 2 itself is purely a scope rule and does not directly grant this evidentiary authority. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.6) **Nature of Procedural Requirement:** The Nav office must independently assess whether an applicant has documented legal stay at the time of application. **Legal Gap:** § 2 states who the law applies to but does not impose a specific independent assessment duty on Nav. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.6 (DOC-REQ-2.2) **Nature of Procedural Requirement:** Persons without a passport or similar travel document must present a decision from the immigration authorities. **Legal Gap:** § 2 does not specify what documentation constitutes proof of legal stay, nor does it mandate presenting a specific administrative decision. **Thematic Category:** [DOC-REQ]

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.7 / DOC-REQ-2.3 — consolidated) **Nature of Procedural Requirement:** The Nav office must request necessary documentation to assess EEA residence rights in every single case. **Legal Gap:** § 2 authorizes regulations for EEA rules but does not itself impose this absolute documentation-requesting duty on caseworkers. **Thematic Category:** [DOC-REQ]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 av 21 **Circular/Source:** R-35, § 2, punkt 1.2.2.6 (PROC-REQ-2.8) **Nature of Procedural Requirement:** If documentation is missing, the Nav office must still evaluate residence status based on the probability of the information provided. **Legal Gap:** This obligation is directly supported by general administrative law (fvl. § 17), but does not originate from the text of § 2 itself. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 10 av 21 **Circular/Source:** Kommunebrev 2025, § 2 (PROC-REQ-2.9) **Nature of Procedural Requirement:** Nav offices shall not assess permanent residence for specific categories of EEA citizens (workers, students, etc.). **Legal Gap:** § 2 authorizes the King to restrict the law; eliminating an assessment step via an administrative Kommunebrev operates within regulatory space but is not directly authorized by § 2's text. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 av 21 **Circular/Source:** Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere

(PROC-REQ-2.10 / DOC-REQ-2.4 — consolidated) **Nature of Procedural Requirement:** When an EEA citizen contacts the office, Nav must map whether they have a registration certificate and its residence basis. **Legal Gap:** § 2 does not prescribe a mandatory first-step mapping of EEA registration certificates. **Thematic Category:** [SEQUENCE]

Requirement Reference: 12 **Finding Reference:** REQUIREMENT 12 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.5) **Nature of Procedural Requirement:** The EEA citizen must document legal stay at the time of application, irrespective of previous registration bases. **Legal Gap:** § 2 does not impose obligations on applicants to document their legal stay, nor does it establish temporal documentation rules regarding prior registration. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 av 21 **Circular/Source:** Veileder EØS-borgere (PROC-REQ-2.11) **Nature of Procedural Requirement:** If working under 10 hours a week, Nav must request employment documentation and conduct a concrete holistic assessment. **Legal Gap:** § 2 contains no reference to weekly working hours, quantitative threshold triggers, or documentation requirements. **Thematic Category:** [SEQUENCE]

Requirement Reference: 14 **Finding Reference:** REQUIREMENT 14 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.6) **Nature of Procedural Requirement:** An EEA citizen claiming worker status who earns insufficiently must document that the basis for residence is still valid. **Legal Gap:** § 2 does not reference worker status, income sufficiency thresholds, or ongoing documentation obligations. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** REQUIREMENT 15 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.7) **Nature of Procedural Requirement:** Self-employed EEA citizens must document that their business activity is genuine and their residence basis remains valid. **Legal Gap:** § 2 contains no reference to self-employment or the criteria that a business must be proven genuine. **Thematic Category:** [DOC-REQ]

Requirement Reference: 16 **Finding Reference:** REQUIREMENT 16 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.8) **Nature of Procedural Requirement:** An individual claiming reasonable cause to resign must document this, such as with a medical certificate. **Legal Gap:** § 2 contains no reference to voluntary resignation, reasonable cause standards, or documentation of such events. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** REQUIREMENT 17 av 21 **Circular/Source:** Veileder EØS-borgere (PROC-REQ-2.12) **Nature of Procedural Requirement:** The assessment must emphasize specific enumerated factors: work hours, salary size, paid vacation rights, and sick pay rights. **Legal Gap:** § 2 is a bare scope rule and contains none of these detailed economic criteria for assessment. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 18 **Finding Reference:** REQUIREMENT 18 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.9) **Nature of Procedural**

Requirement: The evaluation must place weight on documentation in the form of a medical certificate. **Legal Gap:** § 2 contains no reference to medical certificates or evidentiary hierarchies in assessments. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 19 **Finding Reference:** REQUIREMENT 19 av 21 **Circular/Source:** Veileder EØS-borgere (PROC-REQ-2.13) **Nature of Procedural Requirement:** Assessing temporary work incapacity requires a holistic evaluation based on the situation exactly at the time of application. **Legal Gap:** § 2 does not contain the concept of temporary work incapacity, nor does it prescribe a holistic assessment fixed to the application date. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 20 **Finding Reference:** REQUIREMENT 20 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.10) **Nature of Procedural Requirement:** The EEA citizen must present documentation of enrollment in vocational training and provide a short written explanation of its connection to prior employment. **Legal Gap:** § 2 contains no reference to vocational training, enrollment documentation, or the requirement to establish a nexus to prior employment. **Thematic Category:** [DOC-REQ]

Requirement Reference: 21 **Finding Reference:** REQUIREMENT 21 av 21 **Circular/Source:** Veileder EØS-borgere (DOC-REQ-2.11) **Nature of Procedural Requirement:** Family members must document to the Nav office that conditions are met to retain legal residence. **Legal Gap:** § 2 does not reference family members, specify conditions for their residence retention, or impose a documentation burden on them. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 3)

Requirement 1: Nav-kontoret har plikt til å ta imot og vurdere alle skriftlige og muntlige henvendelser som gjelder et behov for sosiale tjenester, uavhengig av hvor personen som henvender seg bor. Source: R-35, § 3 / 2.3.2.1 (PROC-REQ 3.1). Requirement 2: Behovet for tjenester skal vurderes ut fra personens situasjon her og nå. Source: R-35, § 3 / 2.3.2.1 (PROC-REQ 3.2). Requirement 3: Hva slags hjelp og hvor omfattende hjelp Nav-kontoret er forpliktet til å gi etter denne loven, må vurderes ut fra den enkeltes situasjon, hva det søkes om og om oppholdet i kommunen er å anse for fast eller midlertidig. Source: R-35, § 3 / 2.3.2.2 (PROC-REQ 3.3). Requirement 4: I tilfeller hvor en person flytter fra en kommune til en annen uten tilrettelegging fra Nav-kontoret, må Nav-kontoret i den nye kommunen kartlegge og vurdere hjelpebehovet. Source: R-35, § 3 / 2.3.2.3 (PROC-REQ 3.4). Requirement 5: Hvis personen har vedtak om livsopphold fra annen kommune, skal det vurderes om det foreligger behov for livsopphold når vedtaket utløper. Source: R-35, § 3 / 2.3.2.3 (PROC-REQ 3.5). Requirement 6: Hvis personen har bolig i en annen kommune, må det vurderes om det er behov for midlertidig botilbud eller dekning av boutgifter, og om det er behov for bistand til å avvikle boforholdet. Source: R-35, § 3 / 2.3.2.3 (PROC-REQ 3.6). Requirement 7: Nav-kontoret må vurdere søknadene på vanlig måte etter §§ 18 og 19. Source: R-35, § 3 / 2.3.2.4 (PROC-REQ 3.7). Requirement 8: Nav-kontoret bør kontakte og samarbeide med institusjonen eller boligen for forberedelser og tilrettelegging av tjenester ved utskriving. Source: R-35, § 3 / 2.3.2.5 (PROC-REQ 3.8). Requirement 9: Før Nav-kontoret eventuelt avviser søknaden og henviser til oppholdskommunens ansvar i slike situasjoner, bør det gjøres en vurdering av hva som er til beste for søkeren, og eventuell familie, i den konkrete saken. Source: Veileder for samarbeid mellom kriminalomsorgen og Nav (PROC-REQ 3.S1). Requirement 10: Dersom kommunen opplever økt pågang på de sosiale tjenestene, ligger det i kommunens ansvar å sørge for at tjenesten er dimensjonert for å ivareta dette. Source: Kommunebrev 2025 (PROC-REQ 3.S2). Requirement 11: Nav-kontoret har plikt til å nedtegne muntlige søknader. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ 3.1). Requirement 12: ...det holder at søknaden fremgår av saken, som i et notat. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ 3.2). Requirement 13: EØS-borgeren må dokumentere at han har lovlig opphold, evt. dokumentere at han har opparbeidet seg varig oppholdsrett, på søknadstidspunktet for sosiale tjenester. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.3). Requirement 14: På bakgrunn av dette er det nødvendig at Nav-kontoret tar et selvstendig ansvar for at saken er tilstrekkelig opplyst og at oppholdsstatus er dokumentert i saker der et av inngangskriteriene for tjenester, arbeidsrettet oppfølging og tiltak etter loven er lovlig opphold i riket. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.4). Requirement 15: Familiemedlemmet må dokumentere overfor Nav-kontoret at vilkårene er oppfylt for å kunne anses å fortsatt ha lovlig opphold i Norge i sosialtjenestelovens forstand. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.5). Requirement 16: Det må foreligge opplysninger i saken som dokumenterer om søker har et hjelpebehov eller ikke. Source: Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ 3.6). Requirement 17: Dersom behovet er kortvarig, kan opplysningene dokumenteres på følgende måte: [...] Egenerklæring fra søkeren [...] kan også være muntlig, og skrives ned i journalnotat av NAV-kontoret. Source: Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ 3.7). Requirement 18: Det er ikke krav om at samtykke må

utformes skriftlig, men et samtykke er kun gyldig dersom det kan dokumenteres. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ 3.8).

Step 2 — Classify Each Requirement

- **Requirement 1:** [PROCEDURAL/DOCUMENTATION] The finding states this requirement targets the process of how the reception and assessment duty is fulfilled.
- **Requirement 2:** [PROCEDURAL/DOCUMENTATION] The finding notes this requirement mandates a specific "present-situation methodology" for how the caseworker conducts the assessment of needs.
- **Requirement 3:** [PROCEDURAL/DOCUMENTATION] The finding establishes that this requirement mandates a "specific three-factor assessment framework" for how caseworkers must evaluate applications.
- **Requirement 4:** [PROCEDURAL/DOCUMENTATION] The finding indicates this requirement dictates a "mandatory proactive mapping obligation" and procedural trigger when a person relocates.
- **Requirement 5:** [PROCEDURAL/DOCUMENTATION] The finding identifies this as a "mandatory assessment locked to a specific trigger" dictating when and how a caseworker evaluates needs upon an expiring decision.
- **Requirement 6:** [PROCEDURAL/DOCUMENTATION] The finding details this as a "mandatory three-part assessment" specifying precisely what service categories caseworkers must review.
- **Requirement 7:** [PROCEDURAL/DOCUMENTATION] The finding confirms this requirement instructs the caseworker on the regular processing methodology ("på vanlig måte") for applications.
- **Requirement 8:** [PROCEDURAL/DOCUMENTATION] The finding states this dictates an operational procedural step to "contact and collaborate with the institution" before discharge.
- **Requirement 9:** [PROCEDURAL/DOCUMENTATION] The finding categorizes this as establishing a procedural standard (best interest assessment) prior to issuing a jurisdictional rejection and referral.
- **Requirement 10:** [SUBSTANTIVE LEGAL OBLIGATION] The finding characterizes this requirement as a "mandatory capacity management obligation" dictating the municipality's substantive organizational duty and service-dimensioning framework. *(Note: Do not proceed to Step 3 for this requirement)*
- **Requirement 11:** [PROCEDURAL/DOCUMENTATION] The finding explicitly identifies this as a "mandatory documentation obligation" determining how oral applications must be recorded by the office.
- **Requirement 12:** [PROCEDURAL/DOCUMENTATION] The finding explains this requirement sets a "minimum sufficiency standard" for how an application must be documented in the case file.
- **Requirement 13:** [PROCEDURAL/DOCUMENTATION] The finding specifies that this imposes "specific documentation criteria" and burdens on EEA citizens for proving residency.

- **Requirement 14:** [PROCEDURAL/DOCUMENTATION] The finding reveals this requirement converts open factual investigation into a "specific, named, mandatory independent documentation responsibility" for the caseworker.
- **Requirement 15:** [PROCEDURAL/DOCUMENTATION] The finding details this as a "mandatory documentation obligation" dictating how third parties (family members) must record or present proof to the office.
- **Requirement 16:** [PROCEDURAL/DOCUMENTATION] The finding establishes this as a "mandatory documentary precondition" requiring specific contents within the case file to verify needs.
- **Requirement 17:** [PROCEDURAL/DOCUMENTATION] The finding indicates this provides specific "permissible documentation methods" and administrative recording processes for short-term needs.
- **Requirement 18:** [PROCEDURAL/DOCUMENTATION] The finding classifies this as detailing "consent requirements and validity conditions" pertaining strictly to the documentation of consent.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** Krav 1 av 18 — PROC-REQ 3.1 **Circular/Source:** R-35, § 3 / 2.3.2.1 (PROC-REQ 3.1) **Nature of Procedural Requirement:** The NAV office must officially receive and evaluate all inquiries (written and oral) regardless of the applicant's residence. **Legal Gap:** Section 3 functionally ties jurisdictional responsibility to those who "oppholder seg i kommunen," but the circular text actively removes this geographic qualifier at the reception stage. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 2 **Finding Reference:** Krav 2 av 18 — PROC-REQ 3.2 **Circular/Source:** R-35, § 3 / 2.3.2.1 (PROC-REQ 3.2) **Nature of Procedural Requirement:** The caseworker must procedurally assess service needs based on the individual's "here and now" situation. **Legal Gap:** The statute leaves the temporal methodology for needs assessment entirely open, but the circular imposes a fixed "present-moment" criterion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** Krav 3 av 18 — PROC-REQ 3.3 **Circular/Source:** R-35, § 3 / 2.3.2.2 (PROC-REQ 3.3) **Nature of Procedural Requirement:** Needs and assistance must be evaluated through a three-factor procedural framework covering the individual situation, what is applied for, and whether the stay is permanent or temporary. **Legal Gap:** The statute establishes an open normative duty with no assessment criteria, whereas the circular dictates a mandatory multi-factor assessment framework. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 4 **Finding Reference:** Krav 4 av 18 — PROC-REQ 3.4 **Circular/Source:** R-35, § 3 / 2.3.2.3 (PROC-REQ 3.4) **Nature of Procedural Requirement:** The new municipality's NAV office must proactively initiate a mapping and assessment of needs if a person relocates unassisted. **Legal Gap:** Section 3 formulates a reactive outcome responsibility, but the circular escalates this into a specific, proactive assessment procedure triggered by unassisted relocation. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** Krav 5 av 18 — PROC-REQ 3.5 **Circular/Source:** R-35, § 3 / 2.3.2.3 (PROC-REQ 3.5) **Nature of Procedural Requirement:** The caseworker must perform an assessment of subsistence needs at the precise moment a prior municipality's decision expires. **Legal Gap:** The specific trigger of monitoring and acting upon a prior municipality's expiring decision has no textual anchor in Section 3. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 6 **Finding Reference:** Krav 6 av 18 — PROC-REQ 3.6 **Circular/Source:** R-35, § 3 / 2.3.2.3 (PROC-REQ 3.6) **Nature of Procedural Requirement:** The caseworker must assess the need for temporary housing, housing cost coverage, and lease termination assistance if the applicant has housing in another municipality. **Legal Gap:** Section 3 is a general jurisdictional clause lacking specific enumerated service types; attributing these three distinct assessment checks directly to Section 3 creates an unsupported authority link. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** Krav 7 av 18 — PROC-REQ 3.7 **Circular/Source:** R-35, § 3 / 2.3.2.4 (PROC-REQ 3.7) **Nature of Procedural Requirement:** The NAV office must process applications normally according to Sections 18 and 19. **Legal Gap:** There is no legal gap; the circular's procedural instruction directly anchors to and properly operationalizes the mandatory duty specified in Section 3, P2. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** Krav 8 av 18 — PROC-REQ 3.8 **Circular/Source:** R-35, § 3 / 2.3.2.5 (PROC-REQ 3.8) **Nature of Procedural Requirement:** The NAV office should initiate contact and inter-agency collaboration with the institution prior to the user's discharge. **Legal Gap:** There is no legal gap; this procedural recommendation aligns with the mandatory pre-discharge service duties strictly formulated in Section 3, P3. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 9 **Finding Reference:** Krav 9 av 18 — PROC-REQ 3.S1 **Circular/Source:** Veileder for samarbeid mellom kriminalomsorgen og Nav (PROC-REQ 3.S1) **Nature of Procedural Requirement:** A "best interest" evaluation for the applicant and their family should be conducted procedurally before rejecting an application and making a jurisdictional referral. **Legal Gap:** The statute outlines jurisdictional responsibility rules but lacks any text mandating a "best interest" standard as a precondition to jurisdictional rejection. **Thematic Category:** [ASSESS-PROC]

(Requirement 10 skipped — classified as SUBSTANTIVE LEGAL OBLIGATION)

Requirement Reference: 11 **Finding Reference:** Krav 11 av 18 — DOC-REQ 3.1 **Circular/Source:** Veileder til sosialtjenesteloven § 17 (DOC-REQ 3.1) **Nature of Procedural Requirement:** Caseworkers are under a mandatory obligation to record and document oral applications. **Legal Gap:** Section 3 establishes the general jurisdictional responsibility but is entirely silent on how applications are documented; this obligation originates from Section 17 instead. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** Krav 12 av 18 — DOC-REQ 3.2 **Circular/Source:** Veileder til sosialtjenesteloven § 17 (DOC-REQ 3.2) **Nature of Procedural Requirement:** It is procedurally sufficient for the application to merely appear in

the case file (e.g., in a note). **Legal Gap:** Section 3 contains absolutely no provisions detailing minimum documentation standards for applications. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** Krav 13 av 18 — DOC-REQ 3.3 **Circular/Source:** Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.3) **Nature of Procedural Requirement:** EEA citizens are required to provide official documentation establishing their legal or permanent residence at the time of application. **Legal Gap:** The statute leverages the open normative test "oppholder seg," while the circular converts this into a fixed mandatory documentation burden targeting a specific category of individuals. **Thematic Category:** [DOC-REQ]

Requirement Reference: 14 **Finding Reference:** Krav 14 av 18 — DOC-REQ 3.4 **Circular/Source:** Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.4) **Nature of Procedural Requirement:** The NAV office must procedurally take independent responsibility to ensure the case is sufficiently illuminated and residency status is completely documented. **Legal Gap:** Section 3's open factual-assessment duty is improperly escalated into a mandatory, independently named documentation responsibility for residence status lacking direct textual support. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** Krav 15 av 18 — DOC-REQ 3.5 **Circular/Source:** Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere (DOC-REQ 3.5) **Nature of Procedural Requirement:** EEA family members must supply explicit documentation proving that the conditions for their continued legal residence are fulfilled. **Legal Gap:** Section 3 does not impose any formal documentation requirements on third parties, converting an open coverage framework into a rigid documentation mandate. **Thematic Category:** [DOC-REQ]

Requirement Reference: 16 **Finding Reference:** Krav 16 av 18 — DOC-REQ 3.6 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ 3.6) **Nature of Procedural Requirement:** The caseworker's case file must physically contain documented information verifying whether the applicant has a need for help. **Legal Gap:** Section 3 does not provide documentation preconditions for assessing needs, thus creating a hard procedural and documentary threshold devoid of a statutory anchor in this specific clause. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** Krav 17 av 18 — DOC-REQ 3.7 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ 3.7) **Nature of Procedural Requirement:** To satisfy documentation for short-term needs, the office may record an oral self-declaration from the applicant in a journal note. **Legal Gap:** The guidance specifies permissible documentation alternatives for short-term needs, a topic lacking any direct textual foundation in Section 3. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** Krav 18 av 18 — DOC-REQ 3.8 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ 3.8) **Nature of Procedural Requirement:** A user's consent does not strictly need to be in writing, but administrative validity hinges on the office's ability to document it. **Legal Gap:** Section 3 operates entirely outside the domain of consent, validity conditions, or

documentation of consent, providing zero textual basis for this mandate. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 4)

Requirement: "Kommunen må gjennom sin internkontroll sikre at Nav-kontoret er organisert på en måte som sikrer forsvarlige tjenester." Source: PROC-REQ-4.1.

Requirement: "Hva som er forsvarlige tjenester må vurderes i forhold til faglig utvikling, endret verdioppfatning og det som vurderes som god praksis på området." Source: PROC-REQ-4.2.

Requirement: "Det må derfor legges til rette for kvalitetsarbeid i den daglige driften ved Nav-kontoret." Source: PROC-REQ-4.3.

Requirement: "Nav-kontoret må sørge for at alle som henvender seg får sine interesser ivaretatt." Source: PROC-REQ-4.4.

Requirement: "Nav-kontoret må sørge for at søknader behandles uten ugrunnet opphold, og ivareta hjelpebehovet mens søknaden er til behandling." Source: PROC-REQ-4.5.

Requirement: "Hva som regnes som forsvarlig tjenestenivå kan ikke fastslås på generelt grunnlag, men må vurderes konkret og individuelt utfra den enkeltes behov i hvert enkelt tilfelle." Source: PROC-REQ-4.6.

Requirement: "Hjelpen som gis skal baseres på en individuell vurdering med sikte på å styrke den enkeltes forutsetning for mestring og kontroll over eget liv..." Source: PROC-REQ-4.7.

Requirement: "Hvis tjenestemottaker har barn, skal barnas behov vurderes og ivaretas særskilt." Source: PROC-REQ-4.8.

Requirement: "Direktoratet oppfordrer derfor kommunen til å arbeide med å tydeliggjøre hvordan barnets beste-vurderinger skal brukes i saksbehandlingen ved Nav-kontorene..." Source: PROC-REQ-4.9.

Requirement: "Hvis du svarer ja på minst ett av disse spørsmålene, er barn berørt og du må vurdere hva som er til det beste for barnet i den enkelte saken." Source: PROC-REQ-4.10.

Requirement: "En vurdering av barnets beste innebærer å vurdere hva som er barnets beste... vekte hensynet opp mot andre hensyn... vise innholdet i barnets beste-vurderingen..." Source: PROC-REQ-4.11.

Requirement: "NAV-kontoret må være aktive i kartleggingsprosessen slik at man får avdekket hva brukeren har behov for." Source: PROC-REQ-4.12.

Requirement: "Hovedprinsippet for behandling av søknader er derfor at det må foretas individuelle vurderinger basert på opplysninger fra kartleggingen." Source: PROC-REQ-4.13.

Step 2 — Classify Each Requirement

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the use of a specific administrative control mechanism ("internkontroll") to ensure organizational quality.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The requirement establishes the specific normative inputs—professional development, changing values, and good practice—that legally constitute the threshold for an adequate service.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement prescribes an ongoing, named administrative process ("kvalitetsarbeid") within daily operations.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The requirement defines the substantive legal threshold of accessibility and responsiveness ("tilgjengelighet") necessary for a service to be considered defensible.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: Ambiguous — recommend human legal review; the requirement combines administrative processing timelines ("uten ugrunnet opphold") with the substantive duty of addressing acute needs during the wait.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the administrative evaluation form by prohibiting general determinations and demanding concrete, individualized assessment processes.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: Ambiguous — recommend human legal review; the requirement dictates an individual assessment method aimed at achieving the statutory substantive goal of empowerment.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement creates a specific, mandatory administrative assessment procedure that is triggered automatically when a factual condition (the presence of children) is met.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement encourages an institutional administrative procedure to clarify how best-interest evaluations should be integrated into casework processing.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement mandates executing a specific, named administrative assessment ("barnets beste") upon triggering specific factual questions.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement establishes a rigid, three-step sequential administrative methodology (evaluate, weigh, demonstrate) for conducting and documenting an assessment.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement mandates a specific procedural standard of conduct (active participation) by caseworkers during a designated mapping process.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the administrative information-gathering basis that must support the individual assessment procedure during application handling.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** PROC-REQ-4.1 **Circular/Source:** PROC-REQ-4.1 **Nature of Procedural Requirement:** The municipality must use internal controls to ensure the Nav office is organized to deliver appropriate services. **Legal Gap:** The circular converts the open statutory standard of achieving organizational appropriateness under § 4 into a mandatory requirement to use a specific organizational mechanism ("internkontroll"), which is actually regulated by § 5. **Thematic Category:** [REPORTING]

Requirement Reference: 3 **Finding Reference:** PROC-REQ-4.3 **Circular/Source:** PROC-REQ-4.3 **Nature of Procedural Requirement:** The Nav office must facilitate and maintain an ongoing "quality work" process in its daily operations. **Legal Gap:** The circular converts the open standard of quality outcome into a specific, named, mandatory operational process ("kvalitetsarbeid"), fixing an organizational method that the law left open. **Thematic Category:** [OTHER] (Daily operational management process)

Requirement Reference: 5 **Finding Reference:** PROC-REQ-4.5 **Circular/Source:** PROC-REQ-4.5 **Nature of Procedural Requirement:** The office must process applications without undue delay and address the need for help during processing. **Legal Gap:** The procedural timeline element ("uten ugrunnet opphold") primarily derives from the general Public Administration Act (fvl. § 11a), not § 4; grounding it in § 4 creates an ambiguous legal linkage. **Thematic Category:** [SEQUENCE]

Requirement Reference: 6 **Finding Reference:** PROC-REQ-4.6 **Circular/Source:** PROC-REQ-4.6 **Nature of Procedural Requirement:** Needs must be assessed concretely and individually in each case; they cannot be determined generally. **Legal Gap:** No legal gap is identified; this requirement correctly operationalizes the open statutory duty for individualized decision-making under § 4 and administrative law. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** PROC-REQ-4.7 **Circular/Source:** PROC-REQ-4.7 **Nature of Procedural Requirement:** Assistance decisions must be procedurally based on an individualized assessment geared toward empowerment. **Legal Gap:** No legal gap is identified; the requirement directly restates duties correctly flowing from

the purpose clause (§ 1) and the requirement for proper services (§ 4). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** PROC-REQ-4.8 **Circular/Source:** PROC-REQ-4.8 **Nature of Procedural Requirement:** Case handlers must conduct a separate assessment of children's needs if the applicant has children. **Legal Gap:** The circular takes the open legal standard of § 4 and introduces a fixed, condition-triggered, mandatory separate assessment, whose true legal basis lies in the Constitution (Grunnloven § 104). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** PROC-REQ-4.9 **Circular/Source:** PROC-REQ-4.9 **Nature of Procedural Requirement:** Municipalities are encouraged to procedurally clarify how child's best-interest assessments are used during case processing. **Legal Gap:** The institutional duty outlined here is ambiguously linked to § 4, as its actual grounding derives from the UN Convention on the Rights of the Child. **Thematic Category:** [OTHER] (Institutional process clarification)

Requirement Reference: 10 **Finding Reference:** PROC-REQ-4.10 **Circular/Source:** PROC-REQ-4.10 **Nature of Procedural Requirement:** Caseworkers must mandatorily conduct an evaluation of the child's best interests if trigger questions demonstrate a child is affected. **Legal Gap:** The circular mandates a specific, named assessment triggered by conditions, converting the open assessment authority of § 4 into a fixed duty based ambiguously on § 4 rather than the Constitution. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference:** PROC-REQ-4.11 **Circular/Source:** PROC-REQ-4.11 **Nature of Procedural Requirement:** The assessment must be structured using three specific steps: evaluate the child's best interests, weigh them against other concerns, and show the content. **Legal Gap:** The circular converts an open assessment requirement into a paradigm case of shadow binding by mandating a fixed three-step sequential methodology (vurdere → vekte → vise) lacking authorization in § 4. **Thematic Category:** [SEQUENCE]

Requirement Reference: 12 **Finding Reference:** PROC-REQ-4.12 **Circular/Source:** PROC-REQ-4.12 **Nature of Procedural Requirement:** Nav caseworkers must take an active behavioral role in the needs mapping process. **Legal Gap:** The circular converts an open requirement of ensuring adequate assessment into a fixed administrative duty requiring specific active conduct in a named "kartleggingsprosess" mapping process. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** PROC-REQ-4.13 **Circular/Source:** PROC-REQ-4.13 **Nature of Procedural Requirement:** Individual procedural assessments must fundamentally be based on the information gathered during the mapping phase. **Legal Gap:** No legal gap is identified; this requirement legitimately operationalizes the statutory duty to ensure cases are adequately investigated before decisions are made. **Thematic Category:** [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 5)

Requirement: Kommunen skal ha internkontroll etter reglene i kommuneloven § 25-1. Source: R-35, § 5 / PROC-REQ-5.1

Requirement: Internkontrollen skal være systematisk, risikobasert og tilpasset de konkrete forholdene og behovene... Source: R-35, § 5 / PROC-REQ-5.2

Requirement: utarbeide en beskrivelse av virksomhetens hovedoppgaver, mål og organisering Source: R-35, § 5 / PROC-REQ-5.3 = DOC-REQ-5.1

Requirement: ha nødvendige rutiner og prosedyrer Source: R-35, § 5 / PROC-REQ-5.4

Requirement: avdekke og følge opp avvik og risiko for avvik Source: R-35, § 5 / PROC-REQ-5.5

Requirement: dokumentere internkontrollen i den formen og det omfanget som er nødvendig Source: R-35, § 5 / PROC-REQ-5.6 = DOC-REQ-5.2

Requirement: evaluere og ved behov forbedre skriftlige prosedyrer og andre tiltak for internkontroll Source: R-35, § 5 / PROC-REQ-5.7 = DOC-REQ-5.3

Requirement: Arbeids- og velferdsdirektoratet anbefaler kommunene å gjennomgå internkontrollsystemet for de sosiale tjenestene. Source: Kommunebrev 2025 / PROC-REQ-5.8

Requirement: Det er kommunens ansvar å sørge for nødvendig opplæring av sitt personell i arbeids- og velferdsforvaltningen. Source: Kommunebrev 2025 / PROC-REQ-5.9

Requirement: Ivaretar våre internkontrollrutiner at vi vurderer om barn er berørt av de handlingene vi gjør på vårt område? Source: Barnets beste – veileder / PROC-REQ-5.10

Requirement: NAV-leder har ansvar for at hensiktsmessige systemer for risikostyring og internkontroll er etablert og etterleves. Source: Veileder til partnerskapsavtalen / PROC-REQ-5.11

Requirement: Det skal være etablerte rutiner og systemer for å melde uønskede hendelser knyttet til vold, trusler og trakassering... Source: Veileder – trygge brukermøter i NAV / PROC-REQ-5.12

Requirement: Når avvikene behandles er det viktig å finne ut hva som er skjedd, hvorfor det skjedde, rette opp eventuelle feil... Source: Veileder – trygge brukermøter i NAV / PROC-REQ-5.13

Requirement: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste – veileder / DOC-REQ-5.4

Requirement: Arbeidsgiver skal kartlegge og dokumentere risiko ved arbeidet som, hver for seg eller samlet, kan gi risiko for vold og trusler i alle former for brukermøters. Source: Standard for trygge brukermøter i NAV / DOC-REQ-5.5

Requirement: Alle etablerte sikkerhetstiltak skal dokumenteres, og gjøres tilgjengelig for alle ansatte ved enheten. Source: Standard for trygge brukermøter i NAV / DOC-REQ-5.6

Requirement: Tiltak som igangsettes etter en gjennomført risikovurdering skal dokumenteres i gjeldende fagsystemer Source: Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.7

Requirement: Det må også gjøres en vurdering og dokumenteres hva som er «restrisikoen» etter iverksatte tiltak. Source: Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.8

Requirement: Dokumentasjon over innmeldte HMS-avvik og håndteringen av disse (jf. HMS-rutine 5) Source: Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.9

Step 2 — Classify Each Requirement

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This is a verbatim restatement of the statutory provision establishing the foundational, unconditional legal duty to have an internal control system, without specifying how the municipality must administratively implement it. *(Noted here, will not proceed to Step 3)*.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It converts the open statutory requirement into qualitative criteria defining how the internal control system must be structured (systematic and risk-based).

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It mandates the specific administrative production of a written description covering tasks, goals, and organization.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the administrative necessity of establishing routines and procedures for the system.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the specific functional procedure of detecting and following up on deviations.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It prescribes the administrative obligation to document the internal control system.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It establishes a procedural cycle requiring the evaluation and improvement of written procedures when needed.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It calls for a specific administrative procedural action to review the internal control system.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding strictly notes this creates a specific, substantive operational duty to ensure personnel training, which constitutes subject matter falling outside the bounds of procedural internal control entirely. *(Noted here, will not proceed to Step 3)*.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It imposes a fixed administrative requirement that internal control routines must contain a specific child impact assessment step.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It specifies how internal control is administratively organized by assigning responsibility to a named role (NAV-leder) and mandating risk management systems.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It fixes the subject matter of administrative procedures, requiring specific reporting routines for incidents involving violence, threats, and harassment.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates a fixed procedural sequence and investigative steps (fact-finding, cause analysis, error correction) for handling deviations.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It mandates a fixed documentation obligation within the administrative process, requiring that child best-interest assessments always be documented.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It mandates the comprehensive administrative process of mapping and documenting risks for all user meetings.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It establishes fixed administrative obligations requiring that all safety measures be documented and made accessible to unit staff.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It fixes the precise technological medium for record-keeping by requiring that measures be documented in specific IT case management systems.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It establishes a mandatory procedural assessment step requiring residual risk to be evaluated and documented after measures are implemented.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It mandates the administrative creation of a specific documentation category covering all reported HMS deviations and their handling.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** Krav 2 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.2 **Nature of Procedural Requirement:** The internal control system must be structured systematically, be risk-based, and adapted to concrete conditions. **Legal Gap:** § 5 of the Social Services Act contains no qualitative criteria for what internal control must be; authority relies entirely on an unverified reference chain to kommuneloven § 25-1. **Thematic Category:** [REPORTING]

Requirement Reference: 3 **Finding Reference:** Krav 3 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.3 = DOC-REQ-5.1 **Nature of Procedural Requirement:** A written description detailing the entity's main tasks, goals, and organizational structure must be produced. **Legal Gap:** § 5 does not enumerate this specific descriptive document as a required component; it derives from an unverified reference to kommuneloven § 25-1. **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** Krav 4 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.4 **Nature of Procedural Requirement:** The entity must establish necessary administrative routines and procedures. **Legal Gap:** Authority depends on an unverified reference chain to kommuneloven § 25-1, which cannot be confirmed from the available documents. **Thematic Category:** [REPORTING]

Requirement Reference: 5 **Finding Reference:** Krav 5 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.5 **Nature of Procedural Requirement:** The entity must actively detect and follow up on deviations and the risk of deviations. **Legal Gap:** While deviation detection is a standard internal control function, formal authority rests on an unverifiable reference chain to kommuneloven § 25-1. **Thematic Category:** [REPORTING]

Requirement Reference: 6 **Finding Reference:** Krav 6 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.6 = DOC-REQ-5.2 **Nature of Procedural Requirement:** The internal control system must be documented in the necessary form and extent. **Legal Gap:** This documentation duty relies on an unverified reference chain to kommuneloven § 25-1. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** Krav 7 av 19 **Circular/Source:** R-35, § 5 / PROC-REQ-5.7 = DOC-REQ-5.3 **Nature of Procedural Requirement:** Written procedures and other measures must be continuously evaluated and improved when needed. **Legal Gap:** Plausibly compliant with kommuneloven § 25-1, but strictly unconfirmable from the provided documents due to the reference chain limitation. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** Krav 8 av 19 **Circular/Source:** Kommunebrev 2025 / PROC-REQ-5.8 **Nature of Procedural Requirement:** The municipality is directed to specifically review its internal control system. **Legal Gap:** § 5 contains no explicit authorization for the Directorate to dictate that municipalities perform specific review actions beyond ordinary ongoing compliance. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** Krav 10 av 19 **Circular/Source:** Barnets beste – veileder / PROC-REQ-5.10 **Nature of Procedural Requirement:** Internal control routines must actively assess and screen whether children are impacted by local operations.

Legal Gap: § 5 imposes an open, general duty with no explicit mandate requiring child impact assessments as mandatory content, thereby shadow-binding the municipality's procedural discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference:** Krav 11 av 19 **Circular/Source:** Veileder til partnerskapsavtalen / PROC-REQ-5.11 **Nature of Procedural Requirement:** The NAV-leader is assigned mandatory responsibility for establishing and maintaining internal control and risk management systems. **Legal Gap:** § 5 assigns duty generally to the "municipality" and offers no statutory authority to fix internal responsibilities to a named role or introduce distinct "risikostyring" requirements. **Thematic Category:** [OTHER] (Organizational role assignment and responsibility allocation).

Requirement Reference: 12 **Finding Reference:** Krav 12 av 19 **Circular/Source:** Veileder – trygge brukermøter i NAV / PROC-REQ-5.12 **Nature of Procedural Requirement:** Specific routines and reporting systems must be established for incidents involving violence, threats, and harassment. **Legal Gap:** Converts open procedural discretion into a fixed mandate requiring safety incident reporting, a subject properly governed by the Working Environment Act rather than § 5. **Thematic Category:** [REPORTING]

Requirement Reference: 13 **Finding Reference:** Krav 13 av 19 **Circular/Source:** Veileder – trygge brukermøter i NAV / PROC-REQ-5.13 **Nature of Procedural Requirement:** Investigating deviations requires executing specific procedural steps: establish facts, identify causes, and correct errors. **Legal Gap:** § 5 requires detecting deviations but lacks text specifically prescribing these fixed root-cause investigative steps. **Thematic Category:** [SEQUENCE]

Requirement Reference: 14 **Finding Reference:** Krav 14 av 19 **Circular/Source:** Barnets beste – veileder / DOC-REQ-5.4 **Nature of Procedural Requirement:** Child best-interest assessments must be systematically documented so they can be reviewed by others. **Legal Gap:** Child welfare principles lack authority in § 5; mandating this documentation converts the open "nødvendig" normative standard into a fixed, unauthorized obligation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** Krav 15 av 19 **Circular/Source:** Standard for trygge brukermøter i NAV / DOC-REQ-5.5 **Nature of Procedural Requirement:** Risks regarding violence and threats must be comprehensively mapped and documented for absolutely all user meetings. **Legal Gap:** Derives from labor laws (AML) rather than § 5, replacing the open discretionary standard with an absolute, undifferentiated mapping obligation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 16 **Finding Reference:** Krav 16 av 19 **Circular/Source:** Standard for trygge brukermøter i NAV / DOC-REQ-5.6 **Nature of Procedural Requirement:** All safety measures must be strictly documented and made available to every staff member. **Legal Gap:** Eliminates all operational discretion regarding what is necessary to document and share, relying entirely on labor law bases rather than § 5. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** Krav 17 av 19 **Circular/Source:** Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.7 **Nature of Procedural**

Requirement: Risk measures must be explicitly recorded in the specific IT case management systems (fagsystemer). **Legal Gap:** § 5 provides no authority to dictate the technical medium of documentation, thereby shadow-binding the municipality's statutory discretion over form. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** Krav 18 av 19 **Circular/Source:** Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.8 **Nature of Procedural Requirement:** A specific assessment evaluating and documenting residual risk must be performed after measures are implemented. **Legal Gap:** No textual basis exists in § 5 requiring residual risk analysis; imposing it transforms open evaluative judgment into a mandatory, fixed procedure. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 19 **Finding Reference:** Krav 19 av 19 **Circular/Source:** Veileder til standard for trygge brukermøter i NAV / DOC-REQ-5.9 **Nature of Procedural Requirement:** All reported HMS deviations and details regarding their handling must be fully documented. **Legal Gap:** Replaces the open standard of "necessary documentation" under § 5 with a fixed, unqualified obligation based on HMS/labor law frameworks. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 6)

Requirement 1: Nødvendig opplæring skal sikre at den enkelte ansatte har tilstrekkelig kunnskap og kompetanse til å utføre sine arbeidsoppgaver. Source: PROC-REQ-6.1 (R-35 § 6)

Requirement 2: Opplæring og kompetanseheving skal gis ut fra den ansattes individuelle og aktuelle behov. Source: PROC-REQ-6.2 (R-35 § 6)

Requirement 3: Kommunen og Nav-leder skal gjennom styringssystemer og internkontroll legge til rette for og påse at de ansatte har nødvendige kunnskaper for å kunne løse lovpålagte oppgaver. Source: PROC-REQ-6.3 (R-35 § 6)

Requirement 4: Opplæring og kompetanseutvikling bør også baseres på tilbakemeldinger mottatt gjennom klagebehandling og tilsyn, og gjennom samarbeidet med brukergruppenes organisasjoner og frivillige organisasjoner. Source: PROC-REQ-6.4 (R-35 § 6)

Requirement 5: Statsforvalteren og Nav fylke/region skal samarbeide på regionalt nivå om opplæring rettet mot Nav-kontoret. Source: PROC-REQ-6.5 (Kommunebrev 2025)

Requirement 6: Enheter med brukermøter skal ha en plan som sikrer at alle ansatte får systematisk og nødvendig opplæring, trening og øvelser i forebygging og håndtering av vold- og trusselsituasjoner. Source: PROC-REQ-6.6 (Standard for trygge brukermøter i NAV)

Requirement 7: Ansatte må ha fått opplæring før de gjennomfører brukermøter. Source: PROC-REQ-6.7 (Standard for trygge brukermøter i NAV)

Requirement 8: Er barns beste vurderinger en del av nyansattopplæringen og faglig oppdatering av ansatte? Source: PROC-REQ-6.8 (Barnets beste — veileder)

Requirement 9: Enheter med brukermøter skal ha en plan som sikrer at alle ansatte får systematisk og nødvendig opplæring, trening og øvelser i forebygging og håndtering av vold- og trusselsituasjoner. Source: DOC-REQ-6.1 (Standard for trygge brukermøter i NAV)

Requirement 10: Oversikt over hvem som har fått hvilken form for opplæring og tidspunktet for denne. Source: DOC-REQ-6.2 (Veileder til standard for trygge brukermøter i NAV)

Requirement 11: Krav til dokumentert opplæring av ansatte og interne brukere. Source: DOC-REQ-6.3 (Veileder til standard for trygge brukermøter i NAV)

Requirement 12: Oversikt over hvem som har gjennomført hvilke opplæringstiltak knyttet til sikkerhet, vold og trusler. Source: DOC-REQ-6.4 (Veileder til standard for trygge brukermøter i NAV)

Requirement 13: Oversikt over hvem som har gjennomført HMS-grunnopplæring. Source: DOC-REQ-6.5 (Veileder til standard for trygge brukermøter i NAV)

Step 2 — Classify Each Requirement

Requirement 1 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement sets the substantive legal standard by restating the minimum definitional content of what "nødvendig opplæring" entails (ensuring the employee can perform their tasks).

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: The requirement dictates the methodological process of training design (individualization), but lacks explicit textual basis in § 6, rendering its authorization ambiguous.

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: This requirement dictates the use of specific administrative instruments (management systems and internal control) to fulfill training obligations, a mandate which is arguably unsupported by § 6 alone.

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This requirement guides the assessment and evaluation process by recommending specific external feedback sources for determining training content.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This requirement imposes a mandatory administrative coordination and collaboration duty on state actors regarding training operations.

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: This requirement demands the production of a specific document (a plan) to structure training delivery, a formal mandate that is textually unsupported by § 6.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This requirement establishes an absolute sequential rule that dictates the timing of when administrative tasks (user meetings) can be performed relative to completed training.

Requirement 8 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement touches on standard-discretion by suggesting a specific substantive topic (child's best interest assessments) for consideration regarding training content.

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: Identical to Requirement 6, this requirement mandates the creation of a formal document (a plan) to dictate training structure, which lacks explicit authorization in § 6.

Requirement 10 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This dictates administrative form by requiring a mandatory register or overview documenting employee training types and dates.

Requirement 11 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This establishes a formal administrative requirement to produce documented records of completed training for employees and internal users.

Requirement 12 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This requirement imposes a specific record-keeping mandate to maintain an overview tracking completed security and violence training measures.

Requirement 13 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This dictates the production of a specific administrative record tracking the completion of basic HSE training.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** Krav 2 av 13 — PROC-REQ-6.2 **Circular/Source:** PROC-REQ-6.2 (R-35 § 6) **Nature of Procedural Requirement:** Training and competence development must be individualized based on the employee's specific and current needs. **Legal Gap:** The statutory text "nødvendig opplæring" leaves the methodology and approach to training entirely open for the municipality, but the circular mandates individualization as the exclusive approach, thereby eliminating the municipality's

freedom to choose standardized or group-based training methods. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** Krav 3 av 13 — PROC-REQ-6.3 **Circular/Source:** PROC-REQ-6.3 (R-35 § 6) **Nature of Procedural Requirement:** The municipality and Nav-leader must utilize management systems and internal controls to facilitate and ensure employees possess necessary knowledge. **Legal Gap:** The law assigns responsibility exclusively to the municipality and leaves the choice of organizational instruments completely open, whereas the circular impermissibly mandates specific mechanisms (management systems and internal control) and extends the legal duty to an actor not named in the law (Nav-leder). **Thematic Category:** [REPORTING]

Requirement Reference: 4 **Finding Reference:** Krav 4 av 13 — PROC-REQ-6.4 **Circular/Source:** PROC-REQ-6.4 (R-35 § 6) **Nature of Procedural Requirement:** The municipality should base training development on feedback from complaint processing, audits, and cooperation with user and volunteer organizations. **Legal Gap:** The finding establishes no legal gap or escalation, as this is merely a recommendation ("bør") regarding assessment sources that falls comfortably within the municipality's open discretion to determine what is "necessary". **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** Krav 5 av 13 — PROC-REQ-6.5 **Circular/Source:** PROC-REQ-6.5 (Kommunebrev 2025) **Nature of Procedural Requirement:** Statsforvalteren and Nav fylke/region must collaborate regionally regarding training directed at the Nav office. **Legal Gap:** Section 6 names the municipality ("kommunen") as the sole duty-bearer and is completely silent on state actors, providing absolutely no textual basis to impose mandatory collaboration duties on Statsforvalteren or Nav fylke/region. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 6 **Finding Reference:** Krav 6 av 13 — PROC-REQ-6.6 **Circular/Source:** PROC-REQ-6.6 (Standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** Units conducting user meetings must possess a documented plan ensuring systematic training, practice, and exercises in violence and threat prevention for all employees. **Legal Gap:** The open normative term "nødvendig opplæring" grants full methodological discretion to the municipality, but the circular wrongly replaces this freedom with four fixed, mandatory requirements simultaneously: a specific documented form (a plan), a specific content area, structured delivery ("systematisk"), and a universal coverage requirement. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** Krav 7 av 13 — PROC-REQ-6.7 **Circular/Source:** PROC-REQ-6.7 (Standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** Employees are required to complete training before they are permitted to conduct user meetings. **Legal Gap:** The law provides no temporal or sequential parameters for training and does not impose individual employee obligations, yet the circular establishes an absolute prohibition ("må") that eliminates all of the municipality's operational flexibility over timing and sequencing. **Thematic Category:** [SEQUENCE]

Requirement Reference: 9 **Finding Reference:** Krav 9 av 13 — DOC-REQ-6.1 **Circular/Source:** DOC-REQ-6.1 (Standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** Units must maintain a documented plan ensuring all employees

receive systematic training and exercises in violence and threat handling. **Legal Gap:** While the law ("nødvendig opplæring") is entirely open as to content and form without any plan requirement, the circular converts this open discretion into strict, fixed criteria mandating a documented plan alongside specific content and delivery structures. **Thematic Category:** [DOC-REQ]

Requirement Reference: 10 **Finding Reference:** Krav 10 av 13 — DOC-REQ-6.2 **Circular/Source:** DOC-REQ-6.2 (Veileder til standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** An overview must be kept detailing which employees have received which forms of training and when. **Legal Gap:** Section 6 is exclusively a training responsibility provision and contains zero legal authority or delegation for imposing documentation or record-keeping obligations. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** Krav 11 av 13 — DOC-REQ-6.3 **Circular/Source:** DOC-REQ-6.3 (Veileder til standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** Training of employees and internal users must be formally documented. **Legal Gap:** The word "nødvendig" concerns training content and coverage only; Section 6 provides absolutely no textual or structural basis to enforce a documentation or recording obligation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** Krav 12 av 13 — DOC-REQ-6.4 **Circular/Source:** DOC-REQ-6.4 (Veileder til standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** A specific register must be maintained documenting which employees have completed training measures related to security, violence, and threats. **Legal Gap:** The law neither authorizes administrative documentation obligations nor specifies violence and security training as a mandatory subject area requiring corresponding record-keeping. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** Krav 13 av 13 — DOC-REQ-6.5 **Circular/Source:** DOC-REQ-6.5 (Veileder til standard for trygge brukermøter i NAV) **Nature of Procedural Requirement:** A register must be maintained tracking exactly who has completed basic HSE training (HMS-grunnopplæring). **Legal Gap:** Basic HSE training ("HMS-grunnopplæring") is governed entirely by the Working Environment Act (AML), and Section 6 of the Social Services Act neither references HSE training nor authorizes documentation requirements for it. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 7)

Requirement 1: Kommunen skal sørge for bevilgninger til dekning av utgifter til de tjenester som Nav-kontoret er pålagt å yte etter loven. Source: R-35 pkt. 2.7.1

Requirement 2: Søknad om tjenester som en tjenestemottaker har krav på, skal ikke avslås av økonomiske grunner. Source: R-35 pkt. 2.7.1

Requirement 3: Nivået og omfanget av tjenestene må være forsvarlig. Source: R-35 pkt. 2.7.1

Requirement 4: Kommunen bestemmer selv hvordan tjenestetilbudet skal organiseres i Nav-kontoret. Source: R-35 pkt. 2.7.1

Requirement 5: Nav-kontoret må i god tid søke om tilleggsbevilgninger dersom budsjettet antas å bli utilstrekkelig til å dekke pliktmessige ytelser. Source: R-35 pkt. 2.7.1

Requirement 6: ...ligger det i kommunens ansvar å sørge for at tjenesten er dimensjonert for å ivareta dette. Source: Kommunebrev 2025

Requirement 7: Hvis en søker har rett til tjenesten og har et behov som gjør at betingelsene for å få tjenesten er tilstede, kan ikke Nav-kontoret avslå søknaden av økonomiske eller andre ressursmessige grunner. Source: Veileder § 17

Requirement 8: En person som har rett til tjenesten kan ikke avvises eller få avslag med begrunnelse i at Nav-kontoret ikke har kapasitet eller kompetanse til å gi tjenesten. Source: Veileder § 17

Requirement 9: Arbeids- og velferdsdirektoratet anbefaler at kommunen/Nav-kontoret legger inn månedstall på minst følgende av de kommunale indikatorene i Nav-kontorets målekortdatabase, i applikasjonen «Ledelsesinformasjon»: [...] Kroner sosialhjelp totalt (bidrag og lån etter §§ 18 og 19 i sosialtjenesteloven) i løpet av måneden. Source: Kommunebrev 2025

Step 2 — Classify Each Requirement

Requirement 1: **[SUBSTANTIVE LEGAL OBLIGATION]** The requirement dictates the substantive duty of the municipality to provide necessary funding to cover expenses for mandated services. *(Will not proceed to Step 3)*

Requirement 2: **[SUBSTANTIVE LEGAL OBLIGATION]** The requirement concerns the legal outcome of a decision by establishing an explicit prohibition against denying an application on economic grounds. *(Will not proceed to Step 3)*

Requirement 3: **[PROCEDURAL/DOCUMENTATION]** The requirement's legal anchor to § 7 is explicitly flagged as "TVETYDIG" (ambiguous) because the quality standard "forsvarlig" is sourced from a different provision. **Ambiguous — recommend human legal review.**

Requirement 4: **[PROCEDURAL/DOCUMENTATION]** The requirement's statutory connection is flagged as "TVETYDIG" (ambiguous) since § 7 concerns financial responsibility and says nothing about organizational structure. **Ambiguous — recommend human legal review.**

Requirement 5: **[PROCEDURAL/DOCUMENTATION]** The requirement establishes concrete administrative processes regarding how a specific actor (the NAV office) must follow a designated action (apply for supplementary appropriations) within a specific timeframe ("i god tid").

Requirement 6: **[PROCEDURAL/DOCUMENTATION]** The requirement's textual connection is flagged as "TVETYDIG" (ambiguous) because service capacity dimensioning is a distinct operational concept not expressly addressed in the financial provisions of § 7. **Ambiguous — recommend human legal review.**

Requirement 7: **[PROCEDURAL/DOCUMENTATION]** The requirement is flagged as "TVETYDIG" (ambiguous) because it addresses individual application decisions sourced from Veileder § 17, while § 7 governs systemic/budget level responsibility. **Ambiguous — recommend human legal review.**

Requirement 8: **[PROCEDURAL/DOCUMENTATION]** The requirement is flagged as "TVETYDIG" (ambiguous) because extending the financial appropriation duty of § 7 to prohibit individual case rejections based on capacity and competence goes beyond what the text anchors. **Ambiguous — recommend human legal review.**

Requirement 9: **[PROCEDURAL/DOCUMENTATION]** The requirement dictates specific administrative record-keeping steps, defining exactly how monthly data must be entered into a designated IT management application.

Step 3 — Structured Entry

Requirement Reference: 3 **Finding Reference:** Krav 3 av 9 — PROC-REQ-2.7.1.3 **Circular/Source:** R-35 pkt. 2.7.1 **Nature of Procedural Requirement:** The level and scope of the services provided must meet the adequate/defensible standard ("forsvarlig"). **Legal Gap:** The specific normative standard "forsvarlig" is not textually present in § 7, which regulates necessary appropriations, meaning the requirement relies on a different provision (§ 4) for its true legal basis. **Thematic Category: [OTHER]** A substantive quality threshold that is categorized here due to ambiguous legal anchoring.

Requirement Reference: 4 **Finding Reference:** Krav 4 av 9 — PROC-REQ-2.7.1.4 **Circular/Source:** R-35 pkt. 2.7.1 **Nature of Procedural Requirement:** The municipality must autonomously determine the organizational structure of the service offer within the NAV office. **Legal Gap:** The circular introduces a principle of organizational autonomy that lacks grounding in § 7, as the statute exclusively governs financial cost allocation and does not address organizational structure. **Thematic Category: [OTHER]** Organizational structure and administrative autonomy guidelines.

Requirement Reference: 5 **Finding Reference:** Krav 5 av 9 — PROC-REQ-2.7.1.5 **Circular/Source:** R-35 pkt. 2.7.1 **Nature of Procedural Requirement:** The NAV office must apply for supplementary budget appropriations in good time if existing funding is anticipated to be insufficient for mandatory services. **Legal Gap:** The statute grants open how-discretion for ensuring funding, but the circular occupies this space by enforcing a fixed mandatory procedure with a defined actor and specific timing, resulting in a shadow binding without statutory authorization. **Thematic Category: [REPORTING]**

Requirement Reference: 6 **Finding Reference:** Krav 6 av 9 — PROC-REQ-2.7.1.6 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** The municipality must ensure the service is properly dimensioned to maintain sufficient capacity to fulfill obligations. **Legal Gap:** Service dimensioning is an operational concept that goes beyond the explicit textual scope of § 7, which strictly governs financial appropriations, making the connection inferential rather than direct. **Thematic Category: [OTHER]** Operational service capacity planning.

Requirement Reference: 7 **Finding Reference:** Krav 7 av 9 — PROC-REQ-2.7.1.7 **Circular/Source:** Veileder § 17 **Nature of Procedural Requirement:** The NAV office must not deny an individual's application on the grounds of economic or resource constraints if conditions for the service are met. **Legal Gap:** The circular misapplies a systemic budgetary duty (§ 7) to prohibit individual-case rejections, originating from a different normative instrument (Veileder § 17) and creating cross-source attribution ambiguity. **Thematic Category: [ASSESS-PROC]**

Requirement Reference: 8 **Finding Reference:** Krav 8 av 9 — PROC-REQ-2.7.1.8 **Circular/Source:** Veileder § 17 **Nature of Procedural Requirement:** Case assessments must not result in rejection or dismissal due to the NAV office's lack of capacity or competence. **Legal Gap:** While plausible as an inference, the explicit prohibition against competence and capacity-based case rejections exceeds what the financial appropriation text in § 7 can legally authorize. **Thematic Category: [ASSESS-PROC]**

Requirement Reference: 9 **Finding Reference:** Krav 9 av 9 — DOC-REQ-7.1 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** Municipalities/NAV offices must record monthly aggregate data (such as total social assistance expenses) into a specific scorecard database application called "Ledelsesinformasjon". **Legal Gap:** The circular requires a highly specific reporting mechanism—including a named IT application and exact frequency—that is entirely absent from both the statutory text and its preparatory works. **Thematic Category: [DOC-REQ]**

Step 1 — Extract All Requirements for Process inflation(§ 8)

Requirement: Departementet skal følge med at loven og forskriftene og andre bestemmelser som gjelder for tjenester etter denne loven, blir anvendt riktig og på en måte som fremmer lovens formål på en god og hensiktsmessig måte. Source: PROC-REQ-8.1 / R-35 Para 8.

Requirement: sørge for at erfaringene med loven blir vurdert, og at det blir gjennomført nødvendige endringer i regelverket Source: PROC-REQ-8.2 / R-35 Para 8.

Requirement: gi de retningslinjene og instruksene som er nødvendige for å nå det målet som er nevnt i bokstav a Source: PROC-REQ-8.3 / R-35 Para 8.

Requirement: arbeide for at det blir satt i gang forskning som kan få betydning for løsningen av oppgaver etter loven Source: PROC-REQ-8.4 / R-35 Para 8.

Requirement: sørge for at det finnes et forsvarlig tilbud for utdanning av personale, og at de som skal anvende loven ellers, får forsvarlig veiledning Source: PROC-REQ-8.5 / R-35 Para 8.

Requirement: sørge for at det blir utarbeidet informasjonsmateriell som sosialtjenesten kan bruke Source: PROC-REQ-8.6 / R-35 Para 8.

Requirement: Departementet kan kreve at kommunale organer som hører under denne loven, uten hinder av taushetsplikten gir de opplysninger og meldinger som er nødvendige for at departementet kan utføre sine oppgaver etter første ledd. Source: PROC-REQ-8.7 / R-35 Para 8.

Requirement: Departementet kan delegere ansvaret. Source: PROC-REQ-8.8 / R-35 Para 8 Commentary 2.8.1.

Requirement: Arbeids- og velferdsdirektoratet har det nasjonale fag- og forvaltningsansvaret for de sosiale tjenestene, og skal innenfor sitt ansvarsområde medvirke til å forebygge og redusere fattigdom... Source: PROC-REQ-8.9 / Kommunebrev.

Requirement: Arbeids- og velferdsdirektoratet har lovfortolkningsansvar for de sosiale tjenestene i Nav-kontoret. Source: PROC-REQ-8.10 / Kommunebrev.

Requirement: Direktoratet vil utarbeide ytterlige faglig veiledningsmateriell om barns beste til støtte for kommunen i Nav i løpet av 2025. Source: PROC-REQ-8.11 / Kommunebrev.

Requirement: Arbeids- og velferdsdirektoratet anbefaler kommunene å gjennomgå internkontrollsystemet for de sosiale tjenestene. Source: PROC-REQ-8.12 / Kommunebrev.

Requirement: Arbeids- og velferdsdirektoratet anbefaler at kommunen/Nav-kontoret legger inn månedstall på minst følgende av de kommunale indikatorene i Nav-kontorets målekortdatabase... Source: PROC-REQ-8.13 / Kommunebrev.

Requirement: Arbeids- og velferdsdirektoratet arbeider med en veiviser som skal gi retning og ideer i arbeidet med å samordne opplæring på regionalt nivå. Source: PROC-REQ-8.14 / Kommunebrev.

Requirement: Arbeids- og inkluderingsdepartementet har gitt Arbeids- og velferdsdirektoratet i oppdrag å utarbeide en egen veileder om økonomisk sosialhjelp... Source: PROC-REQ-8.15 / Veileder økonomisk stønad.

Step 2 — Classify Each Requirement

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The requirement dictates the legal standard and outcome that the application of the law must meet, specifically that it must be applied correctly and promote the law's purpose. *(Note: Do not proceed to Step 3)*

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement outlines an administrative evaluation process for reviewing experiences with the law and implementing regulatory changes.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the administrative process of producing forms or records, specifically guidelines and instructions.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement prescribes an administrative process to initiate research relevant to solving tasks under the law.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The requirement establishes the substantive legal duty of providing an adequate ("forsvarlig") training and guidance offer. *(Note: Do not proceed to Step 3)*

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the production of specific records, namely informational materials that social services can use.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement establishes an administrative reporting procedure where municipalities must provide necessary information and messages upon request.

Requirement: **[PROCEDURAL/DOCUMENTATION]** — *Ambiguous — recommend human legal review* Justification: The requirement concerns the administrative process of delegating responsibility, but the finding explicitly flags its direct statutory basis in § 8 as ambiguous.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The requirement concerns a core substantive duty and legal outcome, namely the institutional mandate to prevent and reduce poverty. *(Note: Do not proceed to Step 3)*

Requirement: **[PROCEDURAL/DOCUMENTATION]** — *Ambiguous — recommend human legal review* Justification: The requirement outlines the administrative assignment of legal interpretation responsibility, which the finding flags as having an ambiguous explicit statutory basis.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement details the administrative production of specific professional guidance materials regarding the best interests of the child.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates an internal administrative review process regarding municipal internal control systems.

Requirement: **[PROCEDURAL/DOCUMENTATION]** — *Ambiguous — recommend human legal review* Justification: The requirement dictates a specific, ongoing administrative reporting procedure into a database, which the finding flags as having an ambiguous statutory basis under § 8.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the administrative production of a guide ("veiviser") for coordinating regional training.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the administrative task and organizational process of preparing a dedicated guide on financial social assistance.

Step 3 — Structured Entry

Requirement Reference: 2 Finding Reference: KRAV 8.2 Circular/Source: PROC-REQ-8.2 / R-35 Para 8 Nature of Procedural Requirement: Evaluating experiences with the law and implementing regulatory changes. Legal Gap: The finding establishes no gap; the circular reproduces the statutory language verbatim, preserving the open normative standard without imposing fixed criteria or escalation. Thematic Category: [ASSESS-PROC]

Requirement Reference: 3 Finding Reference: KRAV 8.3 Circular/Source: PROC-REQ-8.3 / R-35 Para 8 Nature of Procedural Requirement: Providing necessary guidelines and instructions. Legal Gap: The finding establishes no gap; the circular reproduces the statutory language verbatim, preserving the open normative standard intact. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: KRAV 8.4 Circular/Source: PROC-REQ-8.4 / R-35 Para 8 Nature of Procedural Requirement: Initiating research relevant to tasks under the law. Legal Gap: The finding establishes no gap; the circular reproduces the statutory language verbatim without any escalation. Thematic Category: [OTHER] Facilitation of research.

Requirement Reference: 6 Finding Reference: KRAV 8.6 Circular/Source: PROC-REQ-8.6 / R-35 Para 8 Nature of Procedural Requirement: Preparing informational materials for use by social services. Legal Gap: The finding establishes no gap; the circular reproduces the statutory language verbatim, and the omission of a cross-reference does not constitute an escalation. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: KRAV 8.7 Circular/Source: PROC-REQ-8.7 / R-35 Para 8 Nature of Procedural Requirement: Municipal organs providing necessary information and messages to the Department. Legal Gap: The finding establishes no gap;

the circular preserves the permissive "kan" language and the "nødvendige" evidence standard exactly, without converting it to a mandatory obligation. Thematic Category: [REPORTING]

Requirement Reference: 8 Finding Reference: KRAV 8.8 Circular/Source: PROC-REQ-8.8 / R-35 Para 8 Commentary 2.8.1 Nature of Procedural Requirement: Delegating departmental responsibility. Legal Gap: The finding establishes that while delegation is a recognized administrative principle confirmed in preparatory works, the actual text of § 8 contains no explicit statutory authority for this delegation. Thematic Category: [OTHER] Administrative delegation of authority.

Requirement Reference: 10 Finding Reference: KRAV 8.10 Circular/Source: PROC-REQ-8.10 / Kommunebrev Nature of Procedural Requirement: Holding legal interpretation responsibility for social services in the Nav office. Legal Gap: The finding establishes that while the authority to issue guidelines implies an interpretation role, "lovfortolkningsansvar" as a specific institutional legal mandate is not explicitly grounded in the text of § 8 alone. Thematic Category: [OTHER] Legal interpretation responsibility.

Requirement Reference: 11 Finding Reference: KRAV 8.11 Circular/Source: PROC-REQ-8.11 / Kommunebrev Nature of Procedural Requirement: Preparing further professional guidance material regarding the best interests of the child. Legal Gap: The finding establishes no gap; preparing guidance material falls clearly within the open discretion of § 8(f), meaning the lack of an explicit statutory citation is not disqualifying. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: KRAV 8.12 Circular/Source: PROC-REQ-8.12 / Kommunebrev Nature of Procedural Requirement: Reviewing the internal control system for social services. Legal Gap: The finding establishes no gap; the circular's recommendation is weaker than the law's "skal," representing a standard guidance role without upward escalation. Thematic Category: [ASSESS-PROC]

Requirement Reference: 13 Finding Reference: KRAV 8.13 Circular/Source: PROC-REQ-8.13 / Kommunebrev Nature of Procedural Requirement: Entering monthly figures for municipal indicators into the Nav office's scorecard database. Legal Gap: The finding establishes a gap between the ad hoc information-demand power in § 8 second paragraph and the circular's recommendation for a continuous, permanent reporting regime utilizing specific indicators and a specific database. Thematic Category: [REPORTING]

Requirement Reference: 14 Finding Reference: KRAV 8.14 Circular/Source: PROC-REQ-8.14 / Kommunebrev Nature of Procedural Requirement: Developing a guide to provide direction for coordinating regional training. Legal Gap: The finding establishes no gap; creating a guide is a lawful exercise of how-discretion within the mandate of ensuring adequate training under § 8(e). Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: KRAV 8.15 Circular/Source: PROC-REQ-8.15 / Veileder økonomisk stønad Nature of Procedural Requirement: Preparing a dedicated guide on financial social assistance. Legal Gap: The finding establishes no gap; the organizational task falls comfortably within the open discretion of § 8(c) and (f) to prepare

guidelines and informational material without imposing a new duty. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 9)

Requirement 1: Statsforvalteren skal føre tilsyn med at kommunen oppfyller sine plikter etter kapittel 4, § 13 andre ledd første punktum, tredje ledd, fjerde ledd første punktum og § 16 første ledd. **Source:** PROC-REQ-9.1 / R-35 Para 9

Requirement 2: Statsforvalteren skal også føre tilsyn med kommunens internkontroll med pliktene etter kapittel 4, jf. Kommuneloven § 25-1. **Source:** PROC-REQ-9.2 / R-35 Para 9

Requirement 3: Statsforvalteren skal føre tilsyn med kommunens oppfyllelse av de individuelle tjenestene. **Source:** PROC-REQ-9.3 / R-35 Para 9

Requirement 4: I tilsynet kan det i tillegg kontrolleres om kommunen ved sin internkontroll i tilstrekkelig grad sikrer lovpålagte plikter. **Source:** PROC-REQ-9.4 / R-35 Para 9

Requirement 5: Statsforvalteren skal også føre tilsyn med at påbudet om å utarbeide en sosialberedskapsplan blir fulgt opp. **Source:** PROC-REQ-9.5 / R-35 Para 9

Requirement 6: Statsforvalteren skal føre tilsyn med at kommunen oppfyller sine plikter til samarbeid og samordning. **Source:** PROC-REQ-9.6 / R-35 Para 9

Requirement 7: Tilsyn kan være planlagt og rettet inn mot områder og tema hvor statsforvalteren antar det kan være fare for svikt. **Source:** PROC-REQ-9.7 / R-35 Para 9

Requirement 8: Det kan også foregå som reaksjon på konkrete hendelser statsforvalteren blir kjent med fra ulike kilder, som klagesaker, tips og media. **Source:** PROC-REQ-9.8 / R-35 Para 9

Requirement 9: Tilsyn kan utføres både anmeldt og uanmeldt. **Source:** PROC-REQ-9.9 / R-35 Para 9

Requirement 10: Brudd på lov eller forskrifter som avdekkes gjennom tilsyn blir begrunnet og dokumentert i en tilsynsrapport. **Source:** PROC-REQ-9.10 / R-35 Para 9

Requirement 11: Før pålegg benyttes, skal kommunen få en rimelig frist til å rette forholdet. **Source:** PROC-REQ-9.11 / R-35 Para 9

Requirement 12: Dersom statsforvalteren fatter vedtak om pålegg skal forvaltningslovens saksbehandlingsregler følges. **Source:** PROC-REQ-9.12 / R-35 Para 9

Requirement 13: Statsforvalteren kan i slike tilfeller vurdere å opprette tilsyn for å undersøke om kommunen og Nav-kontoret gir en forsvarlig tjeneste. **Source:** PROC-REQ-9.13 / Veileder til sosialtjenesteloven § 17

Requirement 14: Arbeids- og velferdsdirektoratet anbefaler kommunene å gjennomgå internkontrollsystemet for de sosiale tjenestene. **Source:** PROC-REQ-9.14 / Kommunebrev 2025

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] *Justification:* The requirement dictates the fixed, mandatory legal mandate and exhaustively defines the scope of what Statsforvalteren must supervise. *(Noted here, do not proceed to Step 3)*

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] *Justification:* The requirement defines the mandatory legal duty of Statsforvalteren to supervise the municipality's internal control framework. *(Noted here, do not proceed to Step 3)*

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] *Justification:* The requirement establishes the substantive scope of the supervisory mandate by explicitly targeting individual services. *(Noted here, do not proceed to Step 3)*

Requirement 4: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement dictates an optional administrative step to assess the adequacy of municipal compliance during the execution of internal control supervision.

Requirement 5: [SUBSTANTIVE LEGAL OBLIGATION] *Justification:* The requirement expands the substantive legal duty of the supervisory mandate to include monitoring compliance with social preparedness plans. *(Noted here, do not proceed to Step 3)*

Requirement 6: [SUBSTANTIVE LEGAL OBLIGATION] *Justification:* The requirement defines the substantive legal duty for Statsforvalteren to supervise cooperation and coordination obligations. *(Noted here, do not proceed to Step 3)*

Requirement 7: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement outlines the administrative process for targeting and planning supervision based on anticipated areas of failure.

Requirement 8: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement describes the procedural mechanisms and triggers—such as complaints, tips, and media—for initiating reactive supervision.

Requirement 9: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement dictates the administrative method for executing supervision, allowing it to be either announced or unannounced.

Requirement 10: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement dictates how administrative decisions and identified breaches must be strictly documented and justified in a formal supervisory report.

Requirement 11: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement establishes a sequential administrative step by demanding a reasonable deadline be provided before utilizing an injunction.

Requirement 12: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement dictates that the Public Administration Act's administrative processing rules must be followed when issuing formal injunction decisions.

Requirement 13: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement outlines a procedural option for Statsforvalteren to evaluate whether to initiate a supervisory case based on specific complaints.

Requirement 14: [PROCEDURAL/DOCUMENTATION] *Justification:* The requirement dictates an internal administrative review procedure for municipalities to check their own social service internal control systems.

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** KRAV 9.4 **Circular/Source:** PROC-REQ-9.4 / R-35 Para 9 **Nature of Procedural Requirement:** An optional administrative check during supervision to verify whether the municipality's internal control adequately secures statutory duties. **Legal Gap:** The finding establishes that the law mandates supervision of internal control, and the circular correctly treats this specific mechanism of checking adequacy as an optional procedural mechanism within that mandatory frame, resulting in no legal gap. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** KRAV 9.7 **Circular/Source:** PROC-REQ-9.7 / R-35 Para 9 **Nature of Procedural Requirement:** The administrative process of planning and proactively targeting supervision towards areas and themes where failure is anticipated. **Legal Gap:** The finding establishes that planned supervision is a standard procedural form recognized in Kommuneloven kapittel 30 (incorporated via § 9), meaning the permissive circular formulation is consistent with established procedural flexibility and lacks a gap. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** KRAV 9.8 **Circular/Source:** PROC-REQ-9.8 / R-35 Para 9 **Nature of Procedural Requirement:** Utilizing reactive administrative procedures to trigger supervision based on complaints, tips, media, and specific events. **Legal Gap:** The finding states that reactive supervision based on external sources is a recognized form under the incorporated rules of Kommuneloven kapittel 30, confirming procedural flexibility without any legal gap. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** KRAV 9.9 **Circular/Source:** PROC-REQ-9.9 / R-35 Para 9 **Nature of Procedural Requirement:** Executing supervisory audits either through announced or unannounced procedures. **Legal Gap:** The finding establishes that both announced and unannounced supervision are standard methods incorporated via Kommuneloven kapittel 30, ensuring the circular aligns with procedural freedom and presents no gap. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** KRAV 9.10 **Circular/Source:** PROC-REQ-9.10 / R-35 Para 9 **Nature of Procedural Requirement:** Documenting and providing a formal justification for legal breaches within a specific supervisory report. **Legal Gap:** The absolute requirement for a distinct "tilsynsrapport" and strict documentation is not explicitly stated in § 9 itself; authority relies entirely on the ambiguous incorporation of Kommuneloven kapittel 30, making it unclear if the framework is specific enough to support this requirement without further specification. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** KRAV 9.11 **Circular/Source:** PROC-REQ-9.11 / R-35 Para 9 **Nature of Procedural Requirement:** A sequential process requiring that municipalities are given a reasonable deadline to correct a situation before an injunction is employed. **Legal Gap:** The requirement of a reasonable deadline lacks a gap, as it is a recognized procedural rule under Kommuneloven kapittel 30 that aligns perfectly with fundamental administrative principles of contradiction. **Thematic Category:** [SEQUENCE]

Requirement Reference: 12 **Finding Reference:** KRAV 9.12 **Circular/Source:** PROC-REQ-9.12 / R-35 Para 9 **Nature of Procedural Requirement:** Adhering to the administrative processing rules of the Public Administration Act whenever a formal injunction decision is made. **Legal Gap:** The finding establishes that there is no gap, as the Public Administration Act's processing rules govern individual decisions (such as injunctions) directly ex lege, independently of § 9. **Thematic Category:** [SEQUENCE]

Requirement Reference: 13 **Finding Reference:** KRAV 9.13 **Circular/Source:** PROC-REQ-9.13 / Veileder til sosialtjenesteloven § 17 **Nature of Procedural Requirement:** Procedurally evaluating whether to open a supervisory case to assess if a service provided by a municipality or Nav-office is adequate based on complaint cases. **Legal Gap:** The permissive option to assess initiating a case is a clarification consistent with § 9's general mandate and imposes nothing beyond the law's framework, representing no gap. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** KRAV 9.14 **Circular/Source:** PROC-REQ-9.14 / Kommunebrev 2025 **Nature of Procedural Requirement:** An administrative recommendation directed at municipalities to conduct an internal review of their own social service internal control systems. **Legal Gap:** The requirement lacks direct legal anchoring in § 9—which regulates Statsforvalteren, not the Directorate—making it a structurally misleading classification anomaly that plausibly belongs under § 8 instead. **Thematic Category:** [REPORTING]

Step 1 — Extract All Requirements for Process inflation(§ 10)

Based on the provided Track A finding, there are absolutely zero requirements to extract. The text explicitly states: "**Total requirements extracted: 0**" and confirms that the relevant paragraph "contains no documentation requirements, no procedural mandates, and no operational obligations". Furthermore, "All documents confirm zero requirements were extracted from Rundskriv 35 for this paragraph".

Requirement [None]: No requirements exist in the provided text. Source: N/A

Step 2 — Classify Each Requirement

Not applicable. Because zero requirements were identified in the source text during Step 1, there are no requirements to classify.

Step 3 — Structured Entry

Not applicable. Since no requirements were extracted in Step 1 and none could be classified as [PROCEDURAL/DOCUMENTATION] in Step 2, no structured entries can be produced.

Step 1 — Extract All Requirements for Process inflation(§ 11)

Based on the provided Track A deviation analysis finding for § 11, there are exactly **zero (0)** requirements to extract.

The source explicitly states:

- "Dokument B (Rundskriv 35, § 11) contains **zero (0) circular requirements** linked to § 11."
- "Total documentation requirements in paragraph: 0"
- "Note: Rundskriv 35 § 11 imposes no circular requirements on administering authorities."
- While eight procedural requirements (PROC-REQ-SUPP.1 through SUPP.8) are mentioned in supplementary documents, the finding strictly notes they are "not linked to § 11" and belong to other paragraphs.

Step 2 — Classify Each Requirement

Not applicable. Because there are zero (0) extracted requirements in the provided finding, no classifications can be made.

Step 3 — Structured Entry

Not applicable. Because there are no requirements classified as [PROCEDURAL/DOCUMENTATION], there are no structured entries to produce.

Step 1 — Extract All Requirements for Process inflation(§ 12)

Requirement 1: Kommunen skal gjøre seg kjent med innbyggernes levekår, vie spesiell oppmerksomhet til trekk ved utviklingen som kan skape eller opprettholde sosiale problemer, og søke å finne tiltak som kan forebygge slike problemer. Source: PROC-REQ-12.1 (R-35, § 12, ledd 1).

Requirement 2: Nav-kontoret har en plikt til å medvirke i dette arbeidet. Source: PROC-REQ-12.2 (R-35, § 12).

Requirement 3: Det skal rettes spesielt oppmerksomhet mot forhold som er av betydning for de sosialt vanskeligstilte, personer utenfor arbeidslivet og for oppvekstsvilkårene til barn og unge. Source: PROC-REQ-12.3 (R-35, § 12).

Requirement 4: Nav-kontoret må systematisere og analysere kunnskapen om innbyggernes levekår for å få oversikt over trekk ved utviklingen på samfunnsnivå. Source: PROC-REQ-12.4 (R-35, § 12).

Requirement 5: Er Nav-kontoret kjent med at det foreligger forhold som kan bidra til å skape eller opprettholde sosiale problemer, har kontoret et ansvar for å initiere at det etableres forebyggende tiltak mot dette i kommunen. Source: PROC-REQ-12.5 (R-35, § 12).

Requirement 6: Oppsøkende arbeid skal imidlertid ikke drives på en måte som oppleves som ytre innblanding og virker krenkende. Source: PROC-REQ-12.6 (R-35, § 12).

Requirement 7: For å finne frem til aktuelle forebyggende tiltak, bør det tas utgangspunkt i erfaringer fra det sosiale arbeidet i kommunen, og i generelle og forskningsbaserte kunnskaper... Source: PROC-REQ-12.7 (R-35, § 12).

Requirement 8: Nav-kontoret skal ha forebyggende tiltak som søker å legge forholdene til rette for å utvikle og styrke sosialt fellesskap og solidaritet i nærmiljøet. Source: PROC-REQ-12.8 (R-35, § 12, ledd 2).

Requirement 9: Kunnskap skal formidles til andre kommunale organer og lokale frivillige organisasjoner for å bidra til et helhetlig tjenestetilbud og samordnede løsninger. Source: PROC-REQ-12.9 (R-35, § 12).

Requirement 10: Informasjon skal også gis til kommunens innbyggere generelt, og sosialt vanskeligstilte spesielt... Source: PROC-REQ-12.10 (R-35, § 12).

Requirement 11: Informasjonsvirksomheten bør tilpasses lokale forhold, og gis i ulike former og kanaler. Source: PROC-REQ-12.11 (R-35, § 12).

Requirement 12: Det skal tas hensyn til mennesker med ulike behov for tilrettelagt informasjon. Source: PROC-REQ-12.12 (R-35, § 12).

Requirement 13: NAV-kontoret må sørge for at informasjon om de sosiale tjenestene når ut til befolkningen. Source: PROC-REQ-12.13 (Veileder for økonomisk stønad 2022).

Requirement 14: Kommunen må vurdere hvordan man best kan informere om NAV sitt tilbud også til andre aktuelle samarbeidspartnere. Source: PROC-REQ-12.14 (Veileder for økonomisk stønad 2022).

Requirement 15: Kommunen må derfor rette innsatsen spesielt mot utsatte grupper for å søke å hindre at disse personene havner i vanskelige livssituasjoner. Source: PROC-REQ-12.15 (Veileder for økonomisk stønad 2022).

Requirement 16: Nav-kontoret og kommunen... skal sammen med andre aktører bidra inn i kommunens forebyggende arbeid lokalt. Source: PROC-REQ-12.16 (Kommunebrev 2025).

Requirement 17: Kommunen skal utarbeide en plan for kommunens forebyggende arbeid. Source: DOC-REQ-12.1 (Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret).

Requirement 18: Samarbeidsstrukturer, arenaer og eventuelle rutiner for samarbeid kan også fremgå av kommunens plan for det forebyggende arbeidet. Source: DOC-REQ-12.2 (Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret).

Requirement 19: Dersom vurderingen er gjort i forbindelse med utvikling av nye systemer, utredninger eller i fagutviklingsaktiviteter kan den dokumenteres som en del av rapporter, i rundskrivsarbeid, rutiner og lignende. Source: DOC-REQ-12.3 (Barnets beste — veileder).

Step 2 — Classify Each Requirement

Requirement 1 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding identifies this as the fixed statutory framework duty imposing obligations to evaluate living conditions and seek preventive measures. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3*

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this addresses "HOW-discretion" by delegating internal implementation duties to a specific administrative actor (the NAV office).

Requirement 3 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding establishes that this converts open evidence-assessment into mandatory fixed categorical targets dictating the substantive direction of municipal efforts. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3*

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes this replaces open how-discretion with a mandatory two-step procedural method (systematization and analysis) to process knowledge.

Requirement 5 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding describes this as an operationalization of the substantive statutory duty to conditionally initiate preventive measures. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3*

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as an absolute prohibition strictly restricting open how-discretion regarding the specific method of conducting administrative outreach.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding frames this as procedural operational guidance on the informational base and methodology used to select preventive measures.

Requirement 8 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding explains this changes an effort-based obligation into a substantive, result-based mandate requiring the concrete possession of preventive measures. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3*

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this converts an open duty to spread knowledge into a specific communication procedure targeting fixed institutional recipients.

Requirement 10 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding classifies this as direct guidance on the target scope of who receives communicated information (inhabitants and disadvantaged specifically).

Requirement 11 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding evaluates this as procedural recommendations guiding the specific forms and channels of informational activities.

Requirement 12 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding points out this mandate imposes a specific procedural accessibility and adaptation standard on information activities.

Requirement 13 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding establishes this requires the NAV office to procedurally ensure that communicated information successfully reaches the public.

Requirement 14 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding assesses this as requiring a deliberate procedural evaluation of the communication strategies used to inform partners.

Requirement 15 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding states this converts an open assessment into a mandate dictating that substantive prevention efforts be strictly targeted toward a specific population category. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3*

Requirement 16 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding reveals this mandate converts open organizational discretion into a required multi-actor collaborative structure for executing preventive work.

Requirement 17 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as a requirement to produce a specific documentary output (a formal written plan), removing the choice not to have one.

Requirement 18 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as permissive operational guidance concerning the content of an administrative preventive plan.

Requirement 19 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding classifies this as an optional procedural suggestion for how developmental system-level assessments are documented.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** Requirement 2 of 19 **Circular/Source:** PROC-REQ-12.2 (R-35, § 12) **Nature of Procedural Requirement:** The NAV office must participate in the municipality's work regarding living conditions. **Legal Gap:** No legal escalation or gap; assigns responsibility consistent with statutory scheme and preparatory works. **Thematic Category:** [OTHER] (Allocation of internal administrative responsibility)

Requirement Reference: 4 **Finding Reference:** Requirement 4 of 19 **Circular/Source:** PROC-REQ-12.4 (R-35, § 12) **Nature of Procedural Requirement:** The NAV office must systematically process and analyze knowledge about living conditions. **Legal Gap:** Converts the open how-discretion to "become familiar" with living conditions into a mandatory, specific two-step analytical procedure without explicit delegation. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 6 **Finding Reference:** Requirement 6 of 19 **Circular/Source:** PROC-REQ-12.6 (R-35, § 12) **Nature of Procedural Requirement:** Outreach work must not be conducted in a way that feels intrusive or offensive. **Legal Gap:** Introduces an absolute mandatory prohibition restricting the municipality's open how-discretion regarding outreach methods, which lacks direct statutory authorization in § 12. **Thematic Category:** [USER-COMM]

Requirement Reference: 7 **Finding Reference:** Requirement 7 of 19 **Circular/Source:** PROC-REQ-12.7 (R-35, § 12) **Nature of Procedural Requirement:** Finding preventive measures should be based on local experience and research-based knowledge. **Legal Gap:** No legal gap; the permissive "bør" (should) operates as sound operational guidance within the existing open how-discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** Requirement 9 of 19 **Circular/Source:** PROC-REQ-12.9 (R-35, § 12) **Nature of Procedural Requirement:** Knowledge must be disseminated to other municipal bodies and local voluntary organizations. **Legal Gap:** Converts the entirely open how-discretion regarding "spreading knowledge" into a mandatory duty to inform specific fixed institutional categories. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 10 **Finding Reference:** Requirement 10 of 19 **Circular/Source:** PROC-REQ-12.10 (R-35, § 12) **Nature of Procedural Requirement:** Information must be given to inhabitants generally and the socially disadvantaged specifically. **Legal Gap:** No

legal gap; directly operationalizes the statutory duty with identical imperative force. **Thematic Category:** [USER-COMM]

Requirement Reference: 11 **Finding Reference:** Requirement 11 of 19 **Circular/Source:** PROC-REQ-12.11 (R-35, § 12) **Nature of Procedural Requirement:** Information activities should be adapted to local conditions and provided through diverse forms and channels. **Legal Gap:** No legal gap; uses permissive phrasing, preserving the statute's open how-discretion regarding methods of communication. **Thematic Category:** [USER-COMM]

Requirement Reference: 12 **Finding Reference:** Requirement 12 of 19 **Circular/Source:** PROC-REQ-12.12 (R-35, § 12) **Nature of Procedural Requirement:** Consideration must be given to people with varying needs for adapted information. **Legal Gap:** Introduces a specific mandatory accessibility and adaptation obligation within an area where the statute grants open how-discretion. **Thematic Category:** [USER-COMM]

Requirement Reference: 13 **Finding Reference:** Requirement 13 of 19 **Circular/Source:** PROC-REQ-12.13 (Veileder for økonomisk stønad 2022) **Nature of Procedural Requirement:** The NAV office must ensure that information concerning social services reaches the public. **Legal Gap:** No legal gap; acts as a direct operationalization of the open statutory duty without adding obligations in excess of the law. **Thematic Category:** [USER-COMM]

Requirement Reference: 14 **Finding Reference:** Requirement 14 of 19 **Circular/Source:** PROC-REQ-12.14 (Veileder for økonomisk stønad 2022) **Nature of Procedural Requirement:** The municipality must assess how best to inform partners about NAV's services. **Legal Gap:** No legal gap; mandates a deliberation process that effectively channels but does not eliminate open how-discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 16 **Finding Reference:** Requirement 16 of 19 **Circular/Source:** PROC-REQ-12.16 (Kommunebrev 2025) **Nature of Procedural Requirement:** The NAV office and municipality must collaborate with other actors in local preventive work. **Legal Gap:** Converts the broad organizational how-discretion of the municipality into a mandatory specific organizational method of multi-actor collaboration. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 17 **Finding Reference:** Requirement 17 of 19 **Circular/Source:** DOC-REQ-12.1 (Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret) **Nature of Procedural Requirement:** The municipality must prepare a written plan for its preventive work. **Legal Gap:** Mandates a specific documentary output where the law grants open latitude over the form and organization of work, lacking any statutory basis. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** Requirement 18 of 19 **Circular/Source:** DOC-REQ-12.2 (Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret) **Nature of Procedural Requirement:** Cooperation structures and routines may be included in the municipality's plan for preventive work. **Legal Gap:** No legal gap; permissive operational suggestion that places no restriction on the municipality's execution of its duties. **Thematic Category:** [DOC-REQ]

Requirement Reference: 19 **Finding Reference:** Requirement 19 of 19 **Circular/Source:** DOC-REQ-12.3 (Barnets beste — veileder) **Nature of Procedural Requirement:** System-level assessments may be documented in reports, circulars, routines, etc. **Legal Gap:** No legal gap; a purely permissive suggestion on how to record activities, completely preserving open how-discretion. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 13)

Requirement 1: Kommunen i arbeids- og velferdsforvaltningen skal medvirke til at sosiale hensyn blir ivaretatt av andre offentlige organer som har betydning for at formålet med loven blir oppnådd. Source: R-35 Para 13 (PROC-REQ-13.1).

Requirement 2: Kommunen i arbeids- og velferdsforvaltningen skal samarbeide med andre sektorer, forvaltningsnivåer og tjenesteytere dersom samarbeid er nødvendig for å gi en person oppfølging og et helhetlig og samordnet tjenestetilbud, og når dette kan bidra til å løse oppgavene som kommunen i arbeids- og velferdsforvaltningen er pålagt etter denne loven. Source: R-35 Para 13 (PROC-REQ-13.2).

Requirement 3: Blir det påvist mangler ved de tjenester som andre deler av forvaltningen skal yte til personer med et særlig hjelpebehov, skal kommunen i arbeids- og velferdsforvaltningen om nødvendig ta opp saken med rette vedkommende. Source: R-35 Para 13 (PROC-REQ-13.3).

Requirement 4: Er det uklarhet eller uenighet om hvor ansvaret ligger, skal kommunen i arbeids- og velferdsforvaltningen søke å klargjøre forholdet. Source: R-35 Para 13 (PROC-REQ-13.4).

Requirement 5: Ved behov skal kommunen bestemme hvilken kommunal tjenesteyter som skal ivareta samordningen. Source: R-35 Para 13 (PROC-REQ-13.5).

Requirement 6: Hvis tjenestemottakeren har barn, må Nav-kontoret vurdere om samarbeid med tjenesteytere som gir tjenester til barnet er nødvendig for at barnet skal få et helhetlig og samordnet tjenestetilbud. Source: R-35 Para 13 (PROC-REQ-13.6).

Requirement 7: Nav-kontoret må gjøre en konkret faglig vurdering av hvilke andre tjenesteytere de skal samarbeide med, hva de skal samarbeide om i det enkelte tilfelle, hvor omfattende og langvarig samarbeidet vil bli og hvordan samarbeidet i praksis skal organiseres. Source: R-35 Para 13 (PROC-REQ-13.7).

Requirement 8: Hvis direkte kontakt med instansen ikke gir tilfredsstillende resultater, skal Nav-kontoret bringe saken frem for overordnede myndigheter i kommunen. Source: R-35 Para 13 (PROC-REQ-13.8).

Requirement 9: De ulike tjenestene som skal samarbeide om oppfølgingen av en person, må avklare hvilken tjeneste som skal samordne tjenestetilbudet. Source: R-35 Para 13 (PROC-REQ-13.9).

Requirement 10: For å kunne dele taushetsbelagte opplysninger med andre, må det foreligge en lovhjemmel eller et samtykke som tillater det. Source: R-35 Para 13 (PROC-REQ-13.10).

Requirement 11: Både barnevernstjenesten og Nav-kontoret må undersøke om det allerede foreligger en individuell plan og eventuelt være en bidragsyter i denne. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (PROC-REQ-13.11).

Requirement 12: Nav-kontoret har en plikt til å medvirke i kommunens boligsosiale arbeid. Source: Kommunebrev 2025 (PROC-REQ-13.12).

Requirement 13: Nav skal vurdere hvordan opplysninger i institusjonsmeldingen påvirker eventuelle ytelser fra Nav. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (PROC-REQ-13.13).

Requirement 14: For å kunne dele taushetsbelagte opplysninger til andre, må det foreligge en lovhjemmel eller et samtykke som tillater det. Source: R-35 Para 13 (DOC-REQ-13.1).

Requirement 15: Samarbeidet kan forankres i samarbeidsavtaler eller gjennom faste tverrsektorielle møter, arbeidsformer og rutiner. Source: R-35 Para 13 (DOC-REQ-13.2).

Requirement 16: Det er ikke krav om at samtykke må utformes skriftlig, men et samtykke er kun gyldig dersom det kan dokumenteres. Både kriminalomsorgen og velferdstjenestene har ansvar for å innhente slikt samtykke, og for arkivering og journalføring av samtykket i eget journalsystem. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.3).

Requirement 17: Et uttrykkelig samtykke innebærer at personen må ha gjort noe aktivt for å gi sitt samtykke, og samtykke bør gis skriftlig. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (DOC-REQ-13.4).

Requirement 18: For å lette samarbeidet mellom etatene, er det viktig å innhente informert og skriftlig samtykke til utveksling av taushetsbelagte opplysninger fra innsatte/domfelte, jf. forvaltningsloven § 13 a nr. 1. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.5).

Requirement 19: En IP skal blant annet inneholde en angivelse av hvem som har ansvar for å utarbeide planen og hvem som har ansvar for å sikre koordinering og fremdrift i arbeidet med planen jf. Forskrift om individuell plan ved ytelse av velferdstjenester. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.6).

Requirement 20: Ved inngåelse av partnerskapsavtale som inneholder slike bestemmelser, skal selve delegasjonsvedtaket legges ved avtalen som vedlegg. Delegasjonsvedtaket må beskrive hvilken myndighet som er delegert til den felles lederen, og må angi om leder skal ha det utøvende behandlingsansvaret etter personopplysningsloven. Det må videre angi hvilke oppgaver som kan utføres av ansatte hos den andre eier. Source: Veileder-til-partnerskapsavtalen (DOC-REQ-13.7).

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] The requirement addresses the broad legal duty to ensure social considerations are addressed by other bodies, not a specific administrative process.

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes the threshold and legal duty to cooperate when necessary to provide a holistic service offering.

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] The requirement outlines the substantive legal obligation to address and raise issues when service deficiencies are identified for users with special needs.

Requirement 4: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. (The requirement dictates an administrative action to seek clarification when responsibility is unclear).

Requirement 5: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. (The requirement outlines the administrative step of determining which municipal provider will manage coordination).

Requirement 6: [PROCEDURAL/DOCUMENTATION] The requirement establishes a specific mandatory administrative assessment triggered when a service recipient has children.

Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement sets a mandatory, fixed procedural framework of four elements for assessing how cooperation should be organized.

Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement dictates a strict sequential step-by-step escalation procedure to follow if direct contact with an agency fails.

Requirement 9: [PROCEDURAL/DOCUMENTATION] The requirement outlines an administrative process where participating services must collectively clarify coordination responsibilities.

Requirement 10: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes the substantive legal threshold and prerequisites (consent or legal basis) required before sharing confidential information.

Requirement 11: [PROCEDURAL/DOCUMENTATION] The requirement mandates a concrete investigative procedural step to verify whether an individual plan already exists.

Requirement 12: [SUBSTANTIVE LEGAL OBLIGATION] The requirement creates a broad legal duty to participate in communal housing work rather than prescribing an administrative procedure.

Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement introduces a specific concrete administrative procedure for evaluating institutional messages against potential benefit entitlements.

Requirement 14: [SUBSTANTIVE LEGAL OBLIGATION] The requirement details the substantive legal conditions and consent prerequisites necessary for sharing confidential data.

Requirement 15: [PROCEDURAL/DOCUMENTATION] The requirement discusses the administrative structures and documentary frameworks through which cooperation can be formalized.

Requirement 16: [PROCEDURAL/DOCUMENTATION] The requirement dictates strict administrative procedures and systems for archiving and journaling consent records.

Requirement 17: [PROCEDURAL/DOCUMENTATION] The requirement recommends a specific documentary format (written form) and active action for establishing valid user consent.

Requirement 18: [PROCEDURAL/DOCUMENTATION] The requirement advises on the administrative format and process (informed and written) for obtaining consent from inmates.

Requirement 19: [PROCEDURAL/DOCUMENTATION] The requirement details exact documentation and content standards that must be administratively recorded within an Individual Plan.

Requirement 20: [PROCEDURAL/DOCUMENTATION] The requirement enforces mandatory documentation standards and strict content rules for delegation decisions attached to partnership agreements.

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.4) **Nature of Procedural Requirement:** Must administratively seek to clarify the relationship when responsibility is unclear or contested. **Legal Gap:** No gap exists, as the circular replicates the statutory language exactly including the effort-based qualifier "søke å" with no escalation. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.5) **Nature of Procedural Requirement:** Must determine which municipal service provider will handle coordination when needed. **Legal Gap:** No gap

exists, as the circular accurately reproduces the statutory text and the conditional "ved behov" precisely without escalation. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.6) **Nature of Procedural Requirement:** Must specifically evaluate if cooperation with children's service providers is needed when the user has children. **Legal Gap:** The law targets services for the individual recipient ("en person"), while the circular extends this to a mandatory assessment trigger encompassing the person's children, which lacks clear express textual basis in § 13. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.7) **Nature of Procedural Requirement:** Must conduct a specific assessment covering who to cooperate with, the content, scope, and practical organization of the cooperation. **Legal Gap:** The law allows open judgment on assessing cooperation needs, but the circular substitutes this with a fixed, mandatory four-element checklist that shadow-binds the granted how-discretion and evidence-discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.8) **Nature of Procedural Requirement:** Must escalate the case to superior authorities in the municipality if direct contact with an agency does not yield satisfactory results. **Legal Gap:** The law's discretionary "om nødvendig" duty to escalate is shadow-bound and replaced by the circular with an unconditional, mandatory two-step escalation sequence not found in the statute. **Thematic Category:** [SEQUENCE]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 of 20 **Circular/Source:** R-35 Para 13 (PROC-REQ-13.9) **Nature of Procedural Requirement:** All involved services must jointly clarify which specific service shall coordinate the service provision. **Legal Gap:** The law grants the designation power conditionally ("ved behov") solely to the municipality, whereas the circular shifts this into an unqualified mandatory joint obligation on all services. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 of 20 **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (PROC-REQ-13.11) **Nature of Procedural Requirement:** Must actively investigate if an Individual Plan exists and potentially act as a contributor to it. **Legal Gap:** The law's open method for initiating cooperation is shadow-bound by mandating a specific investigative action step (IP investigation) that is legally rooted in a different provision. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 of 20 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (PROC-REQ-13.13) **Nature of Procedural Requirement:** Must assess how information included in an institutional message affects potential NAV benefit entitlements. **Legal Gap:** The open discretion regarding how to cooperate with external agencies is converted into a mandatory, specific operational procedure for reviewing institutional messages that lacks a direct textual basis in § 13. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 15 **Finding Reference:** REQUIREMENT 15 of 20 **Circular/Source:** R-35 Para 13 (DOC-REQ-13.2) **Nature of Procedural Requirement:** Can structure and anchor cooperation through formal agreements, permanent meetings, working forms, and routines. **Legal Gap:** No gap exists; the circular relies on permissive language ("kan forankres") that aligns with the statutory duty to participate in cooperation organs and does not escalate to a mandatory obligation. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 16 **Finding Reference:** REQUIREMENT 16 of 20 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.3) **Nature of Procedural Requirement:** Must ensure consent is documented and explicitly take responsibility for archiving and journaling the consent in the agency's internal system. **Legal Gap:** Archiving and journaling rules stem exclusively from arkivloven and general administrative law, lacking any statutory authorization within § 13 itself. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** REQUIREMENT 17 of 20 **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (DOC-REQ-13.4) **Nature of Procedural Requirement:** Should ensure explicit consent involves an active action and should be recorded in written form. **Legal Gap:** The recommendation for capturing written consent derives from forvaltningsloven and general administrative doctrine, possessing no textual foundation in § 13. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** REQUIREMENT 18 of 20 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.5) **Nature of Procedural Requirement:** Should obtain informed, written consent from inmates or convicts prior to the exchange of confidential details. **Legal Gap:** The requirement is governed exclusively by forvaltningsloven § 13 a nr. 1, not by § 13 stl., which is confirmed by the circular's own legal citation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 19 **Finding Reference:** REQUIREMENT 19 of 20 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-13.6) **Nature of Procedural Requirement:** Must include specific details in an Individual Plan regarding who is responsible for preparing it and who handles securing its coordination and progress. **Legal Gap:** The content requirements for an IP are mandatory-closed rules originating strictly from the IP Regulation, not from the open coordination discretion granted by § 13. **Thematic Category:** [DOC-REQ]

Requirement Reference: 20 **Finding Reference:** REQUIREMENT 20 of 20 **Circular/Source:** Veileder-til-partnerskapsavtalen (DOC-REQ-13.7) **Nature of Procedural Requirement:** Must physically attach delegation decisions to partnership agreements and must detail delegated authority, data processing responsibilities, and permissible tasks for external employees. **Legal Gap:** The law's open discretion regarding the organization of cooperation organs is shadow-bound by three mandatory prescriptions dictating the exact content of formal legal instruments, none of which have any basis in § 13 stl.. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 14)

Requirement 1: Nav-kontoret bør samarbeide med brukergruppenes organisasjoner og med frivillige organisasjoner, herunder ideelle organisasjoner og sosiale entreprenører. Source: R35-00 pkt. 3.14.1 — PROC-REQ-14.1

Requirement 2: Frivillige organisasjoners arbeid innebærer et supplement til velferdstjenestene etter loven, og skal ikke overta Nav-kontorets ansvar for lovpålagte tjenester. Dette innebærer at Nav-kontoret ikke kan henvise tjenestemottaker til matutdeling i stedet for å yte økonomisk stønad, eller til nattilbud framfor å innvilge midlertidig botilbud. Source: R35-00 pkt. 3.14.1 — PROC-REQ-14.2

Requirement 3: Hvis samarbeidet gjelder anskaffelser av tjenester, må lov om offentlige anskaffelser følges. Source: R35-00 pkt. 3.14.1 — PROC-REQ-14.3

Requirement 4: Kommunen bør derfor vurdere om slike organisasjoner bør få informasjon om de sosiale tjenestene og hvordan brukere kan kontakte NAV-kontoret. Source: Veileder om økonomisk stønad — PROC-REQ-14.4

Requirement 5: NAV-kontoret har ikke anledning til å henvise personer til frivillige organisasjoner som et alternativ til økonomisk sosialhjelp. Source: Veileder om økonomisk stønad — PROC-REQ-14.5

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the administrative form of cooperation by advising NAV offices to collaborate with specific types of voluntary and non-profit organizations.

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement dictates the legal outcome of individual case decisions by imposing an absolute prohibition on substituting statutory economic support and temporary housing duties with voluntary services. *(Note: As a [SUBSTANTIVE LEGAL OBLIGATION], this requirement will not proceed to Step 3).*

Requirement 3: [PROCEDURAL/DOCUMENTATION] Justification: This requirement outlines an administrative process that must be followed, specifically mandating compliance with public procurement law when cooperation involves purchasing services.

Requirement 4: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates an administrative communication process by suggesting the municipality consider sharing service and contact information with voluntary organizations.

Requirement 5: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement dictates the substantive legal obligation of the municipality by absolutely prohibiting the referral of individuals to voluntary organizations as an alternative to granting statutory economic social assistance. *(Note: As a [SUBSTANTIVE LEGAL OBLIGATION], this requirement will not proceed to Step 3).*

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: REQUIREMENT 14.1 Circular/Source: R35-00 pkt. 3.14.1 — PROC-REQ-14.1 Nature of Procedural Requirement: The NAV office should cooperate with user groups and voluntary organizations, specifically including non-profits and social entrepreneurs. Legal Gap: No shadow binding or legal gap arises; the circular uses the exact same permissive register ("bør") as the law, and extending the list of covered entities does not convert the recommendation into a stricter obligation. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 3 Finding Reference: REQUIREMENT 14.3 Circular/Source: R35-00 pkt. 3.14.1 — PROC-REQ-14.3 Nature of Procedural Requirement: The municipality must follow public procurement law (lov om offentlige anskaffelser) if the cooperation entails the procurement of services. Legal Gap: While legally correct by operation of procurement law, the requirement lacks textual support under § 14, as the statutory provision contains no procurement authority or delegation. Thematic Category: [OTHER] (Procurement and compliance procedure).

Requirement Reference: 4 Finding Reference: REQUIREMENT 14.4 Circular/Source: Veileder om økonomisk stønad — PROC-REQ-14.4 Nature of Procedural Requirement: The municipality should consider whether voluntary organizations should receive information regarding available social services and how users can contact the NAV office. Legal Gap: The specific requirement to share information about services and contact details lacks an explicit statutory citation and is not textually present in § 14 or its preparatory works, making its exact legal derivation ambiguous. Thematic Category: [REFERRAL-COORD]

Here is the analysis of the Track A deviation finding, executed according to your instructions.

Step 1 — Extract All Requirements for Process inflation(§ 15)

Requirement 1: Kommunen skal bistå vanskeligstilte på boligmarkedet etter reglene i lov 20. des 2022 nr. 121. Source: PROC-REQ-15.1 / R-35 Para 15 (beginning)

Requirement 2: Kommunen i arbeids- og velferdsforvaltningen skal medvirke i kommunens boligsosiale arbeid. Source: PROC-REQ-15.2 / R-35 Para 15 (beginning)

Requirement 3: Nav-kontoret bør så langt mulig medvirke til å unngå dette. [kontekst: unngå konsentrasjon av vanskeligstilte i bestemte områder]. Source: PROC-REQ-15.3 / R-35 Para 15 (middle)

Requirement 4: Nav-kontoret skal være oppmerksom på bosituasjonen til familier med barn og unge, vanskeligstilte ungdom og personer i overgangs- eller etableringsfaser. Source: PROC-REQ-15.4 / R-35 Para 15 (middle)

Requirement 5: ...bør tiltak og tjenester for å sikre en stabil bosituasjon være en del av individuell plan. Source: PROC-REQ-15.5 / R-35 Para 15 (middle)

Requirement 6: Bidra med sin kunnskap i den kommunale planleggingen av hvordan boligproblem kan løses.... Source: PROC-REQ-15.6 / R-35 Para 15 (end)

Requirement 7: Gjøre andre kommunale organer kjent med behovet for ordinære boliger og tilpassede boligløsninger. Source: PROC-REQ-15.7 / R-35 Para 15 (end)

Requirement 8: Samarbeide med andre instanser, som Husbanken, om tiltak som kan lette situasjonen.... Source: PROC-REQ-15.8 / R-35 Para 15 (end)

Requirement 9: Tilby tjenestemottaker råd og veiledning for å bidra til å sikre en tilfredsstillende bosituasjon. Source: PROC-REQ-15.9 / R-35 Para 15 (end)

Requirement 10: Bistå tjenestemottakere som kan ha behov for tjenester i boligen.... Source: PROC-REQ-15.10 / R-35 Para 15 (end)

Requirement 11: Bistå tjenestemottaker med å skaffe bolig når det er nødvendig.... Source: PROC-REQ-15.11 / R-35 Para 15 (end)

Requirement 12: Nav-kontoret har en plikt til å medvirke i kommunens boligsosiale arbeid. Source: PROC-REQ-15.12 / Kommunebrev 2025

Requirement 13: Når midlertidig botilbud benyttes, skal Nav-kontoret så vidt mulig umiddelbart iverksette tiltak for å sikre overgang til varig bolig. Source: PROC-REQ-15.13 / Veiviser for midlertidig botilbud

Requirement 14: ...er det derfor nødvendig at det tidlig blir kartlagt og avklart hva som skal til for at dette blir en varig og stabil bosituasjon. Source: PROC-REQ-15.14 / Veiviser for midlertidig botilbud

Requirement 15: Barnevernstjenesten og Nav-kontoret bør inngå avtaler som regulerer samarbeid og ansvarsfordeling, når ungdom som skal etableres i egen bolig. Source: PROC-REQ-15.15 / Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret

Requirement 16: Nav-kontoret har en plikt til å medvirke... herunder å bistå tjenestemottaker med å skaffe bolig når det er nødvendig. Source: PROC-REQ-15.16 / Nasjonal veileder Kriminalomsorg og NAV

Requirement 17: Hvis Nav-kontoret ikke finner tilbud, eller tilbudet ikke er kvalitetsmessig forsvarlig bør det sendes avvik. Source: DOC-REQ-15.2 / Veiviser for midlertidig botilbud

Requirement 18: Bruker får vedtak om midlertidig botilbud. Source: DOC-REQ-15.3 / Veiviser for midlertidig botilbud

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Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This dictates the municipality's overarching fixed statutory duty to assist disadvantaged individuals, the substance of which is delegated to an external statute. *(Will not proceed to Step 3)*

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This establishes the core substantive obligation that the office must participate in municipal social housing work. *(Will not proceed to Step 3)*

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This sets a substantive goal regarding spatial distribution (avoiding the concentration of disadvantaged groups) rather than a specific administrative procedure. *(Will not proceed to Step 3)*

Requirement 4: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: This dictates a procedural monitoring focus by mandating caseworkers to be "oppmerksom på" (aware of/monitor) specific targeted demographic subsets. *(Proceed to Step 3)*

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: This dictates the use of a specific administrative tool and document format—the individual plan—as the vehicle for securing a stable housing situation. *(Proceed to Step 3)*

Requirement 6: [PROCEDURAL/DOCUMENTATION] Justification: This dictates the administrative process of participating in and contributing knowledge to municipal planning. *(Proceed to Step 3)*

Requirement 7: [PROCEDURAL/DOCUMENTATION] Justification: This dictates an internal inter-agency procedure to inform and make other municipal organs aware of housing needs. *(Proceed to Step 3)*

Requirement 8: [PROCEDURAL/DOCUMENTATION] Justification: This imposes a mandate regarding inter-agency cooperation procedures with specific named institutions like Husbanken. *(Proceed to Step 3)*

Requirement 9: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This reflects the substantive duty to the user to provide advice and guidance (råd og veiledning). *(Will not proceed to Step 3)*

Requirement 10: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This concerns the substantive provision of assistance via in-home services. *(Will not proceed to Step 3)*

Requirement 11: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This concerns the substantive legal standard of directly procuring housing for users when necessary. *(Will not proceed to Step 3)*

Requirement 12: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This is a direct paraphrase and restatement of the overarching substantive duty to participate in social housing work. *(Will not proceed to Step 3)*

Requirement 13: [PROCEDURAL/DOCUMENTATION] Justification: This enforces a strict temporal sequence ("umiddelbart") and procedure triggered automatically by the use of temporary housing. *(Proceed to Step 3)*

Requirement 14: [PROCEDURAL/DOCUMENTATION] Justification: This dictates a mandatory early-stage administrative assessment procedure to map and clarify housing requirements. *(Proceed to Step 3)*

Requirement 15: [PROCEDURAL/DOCUMENTATION] Justification: This requires the administrative step of entering into formal written agreements to regulate cooperation with the child welfare service. *(Proceed to Step 3)*

Requirement 16: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This defines the substantive legal duty to procure housing applied specifically to the context of criminal justice and release. *(Will not proceed to Step 3)*

Requirement 17: [PROCEDURAL/DOCUMENTATION] Justification: This dictates an internal quality management and control procedure to report deviations (sendes avvik). *(Proceed to Step 3)*

Requirement 18: [PROCEDURAL/DOCUMENTATION] Justification: This dictates the administrative documentation requirement of issuing a formal written decision (vedtak) to the user. *(Proceed to Step 3)*

Step 3 — Structured Entry

Requirement 4

- **Requirement Reference:** 4

- **Finding Reference:** PROC-REQ-15.4
- **Circular/Source:** R-35 Para 15 (middle)
- **Nature of Procedural Requirement:** The office must direct its awareness and monitoring specifically toward the housing situations of families with children, disadvantaged youth, and persons in transitional phases.
- **Legal Gap:** The circular converts the open normative standard ("medvirke") into a SHALL-monitor obligation targeting named demographic groups, eliminating the authority's freedom to determine the focus of its participation without explicit statutory authority.
- **Thematic Category:** [ASSESS-PROC]

Requirement 5

- **Requirement Reference:** 5
- **Finding Reference:** PROC-REQ-15.5
- **Circular/Source:** R-35 Para 15 (middle)
- **Nature of Procedural Requirement:** Measures and services to secure a stable housing situation should be documented as part of an individual plan.
- **Legal Gap:** § 15 contains no reference to individual plans; this documentation requirement is governed by § 28 of the Social Services Act, and neither § 15 nor its preparatory works authorize it as a component of the "medvirke" duty.
- **Thematic Category:** [DOC-REQ]

Requirement 6

- **Requirement Reference:** 6
- **Finding Reference:** PROC-REQ-15.6
- **Circular/Source:** R-35 Para 15 (end)
- **Nature of Procedural Requirement:** Contribute knowledge to municipal planning regarding how housing problems can be solved.
- **Legal Gap:** No gap established; the finding confirms this requirement is directly authorized by preparatory works, which identify planning participation as a recognized legal obligation.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 7

- **Requirement Reference:** 7
- **Finding Reference:** PROC-REQ-15.7
- **Circular/Source:** R-35 Para 15 (end)
- **Nature of Procedural Requirement:** Inform other municipal organs of the need for ordinary and adapted housing solutions.
- **Legal Gap:** No gap established; the finding confirms this internal information-sharing duty is a recognized component of "medvirke" established by preparatory works.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 8

- **Requirement Reference:** 8

- **Finding Reference:** PROC-REQ-15.8
- **Circular/Source:** R-35 Para 15 (end)
- **Nature of Procedural Requirement:** Cooperate with specific other agencies, namely Husbanken, regarding measures that can ease the situation.
- **Legal Gap:** The circular converts the open "medvirke" standard into a specific SHALL-cooperate obligation with a named institution (Husbanken), eliminating the authority's freedom to determine its institutional partnerships.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 13

- **Requirement Reference:** 13
- **Finding Reference:** PROC-REQ-15.13
- **Circular/Source:** Veiviser for midlertidig botilbud
- **Nature of Procedural Requirement:** Immediately implement measures to ensure a transition to permanent housing when temporary housing is utilized.
- **Legal Gap:** The circular converts the open "medvirke" standard into a SHALL-act-immediately temporal obligation triggered by an external event (the use of § 27 temporary housing) which is completely absent from the statutory text.
- **Thematic Category:** [SEQUENCE]

Requirement 14

- **Requirement Reference:** 14
- **Finding Reference:** PROC-REQ-15.14
- **Circular/Source:** Veiviser for midlertidig botilbud
- **Nature of Procedural Requirement:** Conduct an early-stage assessment (mapping and clarification) of what is required to achieve a permanent and stable housing situation.
- **Legal Gap:** Using language equivalent to SHALL ("nødvendig") and early ("tidlig"), the circular dictates a specific mandatory early-stage assessment obligation and timing requirement not derived from the statutory text or preparatory works.
- **Thematic Category:** [ASSESS-PROC]

Requirement 15

- **Requirement Reference:** 15
- **Finding Reference:** PROC-REQ-15.15
- **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret
- **Nature of Procedural Requirement:** Enter into formal agreements that regulate cooperation and the distribution of responsibilities with the child welfare service.
- **Legal Gap:** Formal written agreements between NAV and the child welfare service are not found in § 15 or its preparatory works; specific authority for such agreements must derive from § 13 or general administrative law, not § 15.
- **Thematic Category:** [DOC-REQ]

Requirement 17

- **Requirement Reference:** 17
- **Finding Reference:** DOC-REQ-15.2
- **Circular/Source:** Veiviser for midlertidig botilbud
- **Nature of Procedural Requirement:** Send a deviation report (avvik) if an offer is not found or is not of adequate quality.
- **Legal Gap:** The deviation reporting requirement lacks any authority from the "bistå" or "medvirke" duties in § 15; it is a quality management procedure that derives from supervisory authority regulations rather than the Social Services Act.
- **Thematic Category:** [REPORTING]

Requirement 18

- **Requirement Reference:** 18
- **Finding Reference:** DOC-REQ-15.3
- **Circular/Source:** Veiviser for midlertidig botilbud
- **Nature of Procedural Requirement:** Issue a formal administrative decision document (vedtak) regarding temporary housing to the user.
- **Legal Gap:** The formal decision requirement is misattributed to § 15; the obligation to issue a "vedtak" for temporary housing derives from § 27 and the Public Administration Act (fvl.), not the overarching duties of § 15.
- **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 16)

Requirement: Kommunen plikter å utarbeide en beredskapsplan for kommunen i arbeids- og velferdsforvaltningen i samsvar med lov om helsemessig og sosial beredskap. Source: R-35, § 16 (PROC-REQ-16.1 / DOC-REQ-16.1).

Requirement: Sosialberedskapsplanen skal samordnes med kommunens øvrige beredskapsplaner. Source: R-35, § 16 (PROC-REQ-16.2 / DOC-REQ-16.2).

Requirement: Kommunen skal gi nødvendig hjelp under ulykker eller andre akutte situasjoner. Source: R-35, § 16 (PROC-REQ-16.3).

Requirement: Dersom forholdene tilsier det, skal kommunen yte bistand til andre kommuner ved ulykker og andre akutte situasjoner. Source: R-35, § 16 (PROC-REQ-16.4).

Requirement: Den kommunen som mottar bistand etter tredje ledd, skal yte kommunen som bidrar med hjelp, kompensasjon for utgiftene, med mindre noe annet er avtalt. Source: R-35, § 16 (PROC-REQ-16.5).

Requirement: Statsforvalteren skal føre tilsyn med at planleggingsplikten blir fulgt opp. Source: R-35, § 16 (PROC-REQ-16.6).

Requirement: er kommunen pålagt å utarbeide beredskapsplan for sosiale tjenester i Nav-kontoret. Source: R-35, § 16 avsnitt 3.16.1 (DOC-REQ-16.3).

Requirement: Beredskapsplanen skal utarbeides i samsvar med lov om helsemessig og sosial beredskap. Source: R-35, § 16 (DOC-REQ-16.4).

Requirement: Varslingsrutinen skal være beskrevet i den enkelte enhets beredskapsplan. Source: Veileder til standard for trygge brukermøter i NAV (DOC-REQ-16.5 / PROC-REQ-16.8).

Requirement: Alle NAV-enheter skal ha utarbeidet en egen beredskapsplan, basert på samfunnssikkerhetsinstruksen til regjeringen. Source: Veileder til standard for trygge brukermøter i NAV (DOC-REQ-16.6 / PROC-REQ-16.7).

Requirement: Den helhetlige planen må ivareta at eierne oppfyller lovpålagte krav i respektiv organisasjon, og krav som er satt til etablering/drift av NAV-kontoret. Source: Veileder til partnerskapsavtalen (DOC-REQ-16.7 / PROC-REQ-16.10).

Requirement: Eierne skal i fellesskap sørge for at innholdet i dokumentasjonen detaljeres og beskrives. Source: Veileder til partnerskapsavtalen (DOC-REQ-16.8 / PROC-REQ-16.9).

Requirement: Hvis henvendelsen gjelder hjelp i en nødsituasjon, må søknaden vurderes raskt, helst samme dag. Source: Veileder for økonomisk stønad (PROC-REQ-16.11).

Requirement: Hvilke opplysninger som skal innhentes og hvordan de skal dokumenteres må begrenses til et minimum for å sikre rask saksbehandling. Source: Veileder for økonomisk stønad (PROC-REQ-16.12).

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement specifically dictates the administrative production and formal existence of a preparedness plan document.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative procedure of coordinating the plan with other municipal plans.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] The requirement directly establishes the municipality's substantive legal duty and standard to provide "necessary help" in acute situations.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes a conditional legal obligation to yield inter-municipal assistance when factual conditions are met.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] The requirement governs the legal outcome and financial compensation duty for municipalities receiving assistance.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement mandates an external administrative control and supervisory process to verify compliance with planning duties.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates the specific administrative production of a preparedness plan tailored for the social services sub-unit within the NAV office.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates the external compliance standards that must be adhered to in the administrative formulation of the preparedness plan.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates specific procedural documentation content, namely that a notification routine must be inscribed in the unit's plan.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative generation of separate plan documents by each individual NAV unit.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates the comprehensive, documented compliance purpose the plan must formally serve for both owning organizations.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement dictates a joint administrative process wherein the owners must collaboratively detail and describe documentation content.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement sets a procedural and sequential time-bound limit on how quickly a caseworker must process an emergency application.

Requirement: [PROCEDURAL/DOCUMENTATION] The requirement strictly dictates administrative boundaries on the process of evidence gathering and how cases are to be formally documented.

(Note: Requirements 3, 4, and 5 are classified as [SUBSTANTIVE LEGAL OBLIGATION] and will not proceed to Step 3).

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** Krav 1 av 14 **Circular/Source:** R-35, § 16 (PROC-REQ-16.1 / DOC-REQ-16.1) **Nature of Procedural Requirement:** The municipality must formally prepare a preparedness plan for its labor and welfare administration. **Legal Gap:** None. The finding establishes this requirement is purely prescriptive and has explicit legal basis ("HAS_HJEMMEL"). **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** Krav 2 av 14 **Circular/Source:** R-35, § 16 (PROC-REQ-16.2 / DOC-REQ-16.2) **Nature of Procedural Requirement:** The social preparedness plan must undergo a coordination process with the municipality's other preparedness plans. **Legal Gap:** None. The finding establishes the coordination duty is a fixed statutory mandate with clear legal basis ("HAS_HJEMMEL"). **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 6 **Finding Reference:** Krav 6 av 14 **Circular/Source:** R-35, § 16 (PROC-REQ-16.6) **Nature of Procedural Requirement:** The State Administrator (Statsforvalteren) must supervise and monitor that the planning duty is executed. **Legal Gap:** The requirement is placed under § 16 in the circular, but § 16 contains no language authorizing supervision; the true legal basis exists in § 9, leading to a gap of mis-attribution. **Thematic Category:** [OTHER] (External supervisory control procedure).

Requirement Reference: 7 **Finding Reference:** Krav 7 av 14 **Circular/Source:** R-35, § 16 avsnitt 3.16.1 (DOC-REQ-16.3) **Nature of Procedural Requirement:** A preparedness plan must be specifically prepared for the social services sub-unit within the NAV office. **Legal Gap:** The statute establishes the plan duty at the municipal level, whereas the circular creates a sub-divided, unit-specific obligation not explicitly found in § 16. **Thematic Category:** [DOC-REQ]

Requirement Reference: 8 **Finding Reference:** Krav 8 av 14 **Circular/Source:** R-35, § 16 (DOC-REQ-16.4) **Nature of Procedural Requirement:** The preparedness plan must be aligned and prepared in accordance with the health and social preparedness act. **Legal Gap:** None. The finding confirms the statutory text explicitly supports this external standard ("HAS_HJEMMEL"). **Thematic Category:** [DOC-REQ]

Requirement Reference: 9 **Finding Reference:** Krav 9 av 14 **Circular/Source:** Veileder til standard for trygge brukermøter i NAV (DOC-REQ-16.5 / PROC-REQ-16.8) **Nature of Procedural Requirement:** A notification routine (varslingsrutine) must be explicitly described within the preparedness plan of the individual unit. **Legal Gap:** Section 16 is silent on specific content requirements, but the circular imposes a mandatory content requirement that is not found in the statute. **Thematic Category:** [DOC-REQ]

Requirement Reference: 10 **Finding Reference:** Krav 10 av 14 **Circular/Source:** Veileder til standard for trygge brukermøter i NAV (DOC-REQ-16.6 / PROC-REQ-16.7) **Nature of Procedural Requirement:** Every individual NAV unit is mandated to prepare its own separate preparedness plan based on a government societal security instruction. **Legal Gap:** The statute authorizes a single municipal-level plan, but the circular multiplies this into a per-unit obligation and inappropriately shifts the legal basis to an administrative instruction not authorized by § 16. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** Krav 11 av 14 **Circular/Source:** Veileder til partnerskapsavtalen (DOC-REQ-16.7 / PROC-REQ-16.10) **Nature of Procedural Requirement:** The overarching plan must formally guarantee that the organizational owners fulfill their respective statutory requirements and the conditions set for NAV office operations. **Legal Gap:** The circular reformulates the plan duty into a comprehensive compliance tool spanning both owners' entire organizations, extending well beyond the authorized scope of § 16. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** Krav 12 av 14 **Circular/Source:** Veileder til partnerskapsavtalen (DOC-REQ-16.8 / PROC-REQ-16.9) **Nature of Procedural Requirement:** The owners must jointly and collectively ensure that the content within the documentation is fully detailed and described. **Legal Gap:** The circular introduces a joint, mandatory procedural co-obligation for both owners to collectively generate documentation, which is completely absent from § 16 and cannot be derived from its text. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** Krav 13 av 14 **Circular/Source:** Veileder for økonomisk stønad (PROC-REQ-16.11) **Nature of Procedural Requirement:** Emergency help applications must be evaluated and processed rapidly, preferably on the very same day. **Legal Gap:** The circular converts the law's open normative standard ("nødvendig hjelp") into a near-absolute, specific time-bound processing obligation, shadow-binding the authority's freedom to assess the appropriate response timeframe under the statute. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** Krav 14 av 14 **Circular/Source:** Veileder for økonomisk stønad (PROC-REQ-16.12) **Nature of Procedural Requirement:** The acquisition of information and the way it is documented must be constrained to a strict minimum to facilitate fast case processing. **Legal Gap:** The circular shadow-binds the authority's evidence-discretion by imposing an absolute upper limit on evidence gathering, which eliminates the legally granted freedom to ascertain what information is actually needed to fulfill the statutory duty. **Thematic Category:** [ASSESS-PROC]

Here is the analysis of the Track A deviation finding based on your requested three-step framework.

Step 1 — Extract All Requirements for Process inflation(§ 17)

Requirement 1: Råd og veiledning er en tjeneste som det skal fattes vedtak om eller som skal inngå som del av vedtak. Source: R-35, § 4.17.2.4 (DOC-REQ-17.1) Requirement 2: Hvis tjenestemottaker får råd og veiledning i forbindelse med at vedkommende mottar andre tjenester etter loven, skal det i vedtaket som fattes om denne tjenesten fremgå hva som er gitt av råd og veiledning. Source: R-35, § 4.17.2.4 (DOC-REQ-17.2) Requirement 3: Hvis tjenestemottaker ikke har en pågående sak, men har behov for råd og veiledning, kan vedkommende søke om denne tjenesten og få et vedtak om retten til tjenesten. Source: R-35, § 4.17.2.4 (DOC-REQ-17.3) Requirement 4: Det er retten til tjenesten som sådan, og ikke det nærmere innhold i hva rådgivningen skal gå ut på, som må fremgå av vedtaket. Source: R-35, § 4.17.2.4 (DOC-REQ-17.4) Requirement 5: Vedtaket skal i tillegg inneholde tidspunktet for rådgivningen eller en tidsfrist for når tjenesten skal oppfylles. Source: R-35, § 4.17.2.4 (DOC-REQ-17.5) Requirement 6: Hvis en deltaker i kvalifiseringsprogram har råd og veiledning som tiltak i programmet sitt, skal det fattes vedtak om tjenesten som tiltak. Source: R-35, § 4.17.2.4 (DOC-REQ-17.6) Requirement 7: Nav-kontoret kan avslå eller avslutte råd og veiledningen... Det skal i så tilfelle fattes enkeltvedtak om dette. Source: R-35, § 4.17.2.4 (DOC-REQ-17.7) Requirement 8: Nav-kontoret har plikt til å nedtegne muntlige søknader. Source: Veileder til sotjl. § 17 (DOC-REQ-17.8) Requirement 9: Det er ikke nødvendig at nedtegnelsen skjer ved å fylle ut et søknadsskjema; det holder at søknaden fremgår av saken, som i et notat. Source: Veileder til sotjl. § 17 (DOC-REQ-17.9) Requirement 10: ...dette tidspunktet skal fremgå av saken. Source: Veileder til sotjl. § 17 (DOC-REQ-17.10) Requirement 11: Råd og veiledning gitt i forbindelse med innvilgelse eller avslag av andre sosiale tjenester skal omtales i innvilgelsesvedtaket eller avslaget. Source: Veileder til sotjl. § 17 (DOC-REQ-17.11) Requirement 12: Alle søknader om tjenesten skal vurderes individuelt og konkret ut fra søkerens behov på søknadstidspunktet, og avgjørelsen skal fattes i et enkeltvedtak. Source: Veileder til sotjl. § 17 (DOC-REQ-17.12) Requirement 13: Vedtaket skal vise om tjenesten er innvilget eller avslått, hva som eventuelt er innvilget og begrunnelsen for avgjørelsen. Source: Veileder til sotjl. § 17 (DOC-REQ-17.13) Requirement 14: Vedtak om innvilgelse skal inneholde tidspunkt for oppstart av tjenesten, i form av konkret timeavtale eller frist for når første samtale skal være avholdt... Source: Veileder til sotjl. § 17 (DOC-REQ-17.14) Requirement 15: Begrunnelsen skal vise til regelen vedtaket bygger på, som her vil være sotjl. § 17, og nevne faktiske forhold ved brukerens situasjon som har hatt betydning for avgjørelsen. Source: Veileder til sotjl. § 17 (DOC-REQ-17.15) Requirement 16: Avgjørelser om tildeling av tjenesten opplysning, råd og veiledning skal fattes i eget vedtak eller inngå som del av et vedtak som gjelder andre sosiale tjenester. Source: Veileder til sotjl. § 17 (DOC-REQ-17.16) Requirement 17: Hvis brukeren får opplysning, råd og veiledning i forbindelse med innvilgelse eller avslag av en annen tjeneste i sosialtjenesteloven, skal det i vedtaket som fattes om denne tjenesten fremgå hva som er gitt av opplysning, råd og veiledning. Source: Veileder til sotjl. § 17 (DOC-REQ-17.17) Requirement 18: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sotjl. § 17 (DOC-REQ-17.18) Requirement 19: Hvis det er forhold ved saken som gjør at tjenesten avsluttes... skal det skrives et avslutningsnotat, eventuelt et avslutningsbrev som informasjon til brukeren. Source: Veileder til sotjl. § 17 (DOC-REQ-17.19) Requirement

20: Hva som er gjort og hvilke løsninger som er valgt skrives i et avslutningsnotat. Source: Veileder til sotjl. § 17 (DOC-REQ-17.20) Requirement 21: Råd og veiledning er en tjeneste som det skal fattes vedtak om eller som skal inngå som del av vedtak. Vedtaket skal bidra til å sikre tjenestemottakers rettigheter. Source: Kommunebrev 2025 (DOC-REQ-17.21) Requirement 22: Nav-kontoret skal vurdere hvilke råd og veiledningsbehov den enkelte har, og tilpasse tjenesten ut fra dette. Source: R-35, § 4.17.1 (PROC-REQ-17.1) Requirement 23: Kartlegging av barn og unges behov i familier som er mottakere av økonomisk stønad til livsopphold vil være nødvendig for å kunne gi veiledning i den konkrete situasjonen. Source: R-35, § 4.17.1 (PROC-REQ-17.2) Requirement 24: Nav-kontoret skal på bakgrunn av sin råd og veiledningsplikt ha et helhetlig fokus på tjenestemottakerens livssituasjon på ulike områder... Source: R-35, § 4.17.2.1 (PROC-REQ-17.3) Requirement 25: Innholdet i råd og veiledningen må vurderes ut fra sosialfaglige normer og behovene til den enkelte tjenestemottaker. Source: R-35, § 4.17.2.1 (PROC-REQ-17.4) Requirement 26: Nav-kontoret har plikt til å henvise til andre forvaltningsorgan i tilfeller der veiledningsbehovet går ut over Nav-kontorets kompetanse, og skal «så vidt mulig» sørge for at andre instanser gir hjelp. Source: R-35, § 4.17.2.1 (PROC-REQ-17.5) Requirement 27: Råd og veiledning er en tjeneste som det skal fattes vedtak om eller som skal inngå som del av vedtak. Source: R-35, § 4.17.2.4 (PROC-REQ-17.6) Requirement 28: ...må Nav-kontoret vurdere behovet for rådgivningen og angi innen hvilket tidspunkt rådgivningen skal finne sted. Source: R-35, § 4.17.2.4 (PROC-REQ-17.7) Requirement 29: Nav-kontoret skal etter eget tiltak vurdere tjenestemottakers behov for veiledning. Source: R-35, § 4.17.2.6 (PROC-REQ-17.8) Requirement 30: Når Nav-kontoret skal avklare tjenestemottakers behov for økonomisk rådgivning, er det nødvendig å kartlegge vedkommendes faktiske inntekter, utgifter, eiendeler og gjeld. Source: R-35, § 4.17.2.7 (PROC-REQ-17.9) Requirement 31: Ut fra det som kommer frem under kartleggingen, må Nav-kontoret vurdere på hvilket nivå rådgivningen skal gis. Source: R-35, § 4.17.2.7 (PROC-REQ-17.10) Requirement 32: Der det foreligger alvorlige gjeldsproblemer, må Nav-kontoret informere om gjeldsordningen. [...] Nav-kontoret har plikt til å bistå skyldneren så langt det er mulig... Source: R-35, § 4.17.2.9 (PROC-REQ-17.11) Requirement 33: Råd og veiledning er en tjeneste som det skal fattes vedtak om eller som skal inngå som del av vedtak. Source: Kommunebrev 2025 (PROC-REQ-17.12) Requirement 34: Dersom en mindreårig søker om tjenesten opplysning, råd og veiledning må Nav-kontoret innhente samtykke fra den eller de med foreldreansvaret før det søkes om tjenesten. Source: Veileder sotjl. § 17 (PROC-REQ-17.13) Requirement 35: I behandlingen av en søknad må Nav-kontoret avklare om det er noe som haster og må løses umiddelbart. Source: Veileder sotjl. § 17 (PROC-REQ-17.14) Requirement 36: Alle søknader om tjenesten skal vurderes individuelt og konkret ut fra søkerens behov på søknadstidspunktet, og avgjørelsen skal fattes i et enkeltvedtak. Source: Veileder sotjl. § 17 (PROC-REQ-17.15) Requirement 37: Det må innledningsvis avklares om saken dreier seg om forhold som faller inn under økonomisk rådgivning som kan/bør behandles av kommunal rådgivningstjeneste. Source: Veileder øk. rådgivning (PROC-REQ-17.16) Requirement 38: Dersom rådgiveren skal innhente dokumentasjon, må bruker gi rådgiveren fullmakt til dette. Source: Veileder øk. rådgivning (PROC-REQ-17.17) Requirement 39: Det er også viktig å kartlegge den økonomiske situasjonen hos samboer/ektefelle, selv om denne normalt ikke er ansvarlig for brukerens gjeld. Source: Veileder øk. rådgivning (PROC-REQ-17.18)

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative process of providing the service through a formal decision (vedtak). Requirement 2: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates how the content of the guidance should be procedurally recorded alongside another service's decision. Requirement 3: [PROCEDURAL/DOCUMENTATION] The requirement describes the administrative procedural pathway to apply for and formalize the service as a stand-alone decision. Requirement 4: [PROCEDURAL/DOCUMENTATION] The requirement dictates the specific procedural limit on what substance must be documented in the formal decision. Requirement 5: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural inclusion of timing or a deadline in the administrative decision. Requirement 6: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural step to formalize the service in a separate decision within a qualifying program context. Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural safeguard of issuing an enkeltvedtak for adverse decisions like rejection or termination. Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement enforces the administrative case management duty to formally record oral applications. Requirement 9: [PROCEDURAL/DOCUMENTATION] The requirement addresses the procedural flexibility regarding the documentation format of an application. Requirement 10: [PROCEDURAL/DOCUMENTATION] The requirement dictates the basic procedural case management datum of documenting the application date. Requirement 11: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the placement of documentation in a separate decision. Requirement 12: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural assessment of the application and its formalization into an enkeltvedtak. Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement dictates the explicit procedural contents that must be recorded within a formal decision. Requirement 14: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement imposes a procedural mandate for how the start timing of a service must be communicated and recorded formally. Requirement 15: [PROCEDURAL/DOCUMENTATION] The requirement strictly dictates the reasoning and factual basis that procedurally must be contained within the decision document. Requirement 16: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural form (vedtak) required to grant the specific service. Requirement 17: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural documentation of the guidance inside another service's decision. Requirement 18: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural separation of decision records within the KVP measure context. Requirement 19: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the administrative handling and documentation required when the service relationship terminates. Requirement 20: [PROCEDURAL/DOCUMENTATION] The requirement establishes a specific mandatory administrative record-keeping obligation for recording the actions and solutions chosen at service termination. Requirement 21: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural mandate for a formal decision alongside stating an interpretive administrative purpose. Requirement 22: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural assessment steps to identify individual needs and adapt

the service. Requirement 23: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the scope of procedural mapping and information gathering concerning children. Requirement 24: [PROCEDURAL/DOCUMENTATION] The requirement sets a procedural methodological mandate for holistic evaluation across different life areas. Requirement 25: [SUBSTANTIVE LEGAL OBLIGATION] The requirement explicitly sets a legal standard that the content of guidance must be assessed against social-professional norms and individual needs. *(Noted here, do not proceed to Step 3 for this requirement)* Requirement 26: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes the municipality's substantive legal duty and standard for referring individuals to other agencies when competency is exceeded. *(Noted here, do not proceed to Step 3 for this requirement)* Requirement 27: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative procedural form (vedtak) for the service. Requirement 28: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement imposes an administrative procedure to assess need and specify formal timing in a decision. Requirement 29: [PROCEDURAL/DOCUMENTATION] The requirement sets a procedural duty for proactive assessment of guidance needs. Requirement 30: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement strictly dictates the specific elements of a procedural mapping and fact-gathering assessment checklist. Requirement 31: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural assessment step to determine the level of counseling intensity based on mapping. Requirement 32: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates a duty to administratively inform users regarding debt relief schemes based conditionally on their case. Requirement 33: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative form of issuing a vedtak for the service. Requirement 34: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates an administrative procedure to verify capacity and obtain parental consent prior to application processing. Requirement 35: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement establishes a procedural case management triage step during intake to identify urgency. Requirement 36: [PROCEDURAL/DOCUMENTATION] The requirement combines a procedural instruction to individually assess cases and formalize them via enkeltvedtak. Requirement 37: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement mandates a procedural initial administrative scoping and case-classification step. Requirement 38: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural acquisition of third-party consent documentation from the user. Requirement 39: [PROCEDURAL/DOCUMENTATION] The requirement provides a recommended procedural scope for evaluating household financial information during mapping.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: DOC-REQ-17.1 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.1) Nature of Procedural Requirement: Dictates the requirement to grant the service using a formal administrative decision (vedtak). Legal Gap: No gap

established; fully grounded in the Social Services Act and Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: DOC-REQ-17.2 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.2) Nature of Procedural Requirement: Dictates that guidance provided alongside another service must have its details recorded within that other service's vedtak. Legal Gap: The finding establishes that the Act provides no authority regarding how guidance is documented in another service's decision, making the specific placement requirement textually unclear. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: DOC-REQ-17.3 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.3) Nature of Procedural Requirement: Describes the administrative pathway allowing an individual to apply for the stand-alone service and receive a formal vedtak. Legal Gap: No gap established; fully grounded in the Social Services Act and Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: DOC-REQ-17.4 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.4) Nature of Procedural Requirement: Restricts the mandatory content of the vedtak strictly to establishing the right to the service, exempting detailed service contents. Legal Gap: No gap established; aligns with the Act’s open-content design and administrative limitations. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: DOC-REQ-17.5 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.5) Nature of Procedural Requirement: Dictates that the formal decision must specify a timing or deadline for the guidance delivery. Legal Gap: The finding establishes that while the Act leaves timing to open professional discretion, the circular escalates this into a mandatory vedtak content requirement, removing the professional flexibility over timing without a statutory anchor. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: DOC-REQ-17.6 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.6) Nature of Procedural Requirement: Mandates that a formal vedtak must be generated when the guidance service acts as a qualification program (KVP) measure. Legal Gap: The finding establishes that the Act contains no reference to KVP, meaning the specific requirement linking § 17 guidance formally to KVP measures lacks clear textual authority in § 17. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: DOC-REQ-17.7 Circular/Source: R-35, § 4.17.2.4 (DOC-REQ-17.7) Nature of Procedural Requirement: Dictates that rejecting or terminating the service must follow the procedure of generating an enkeltvedtak. Legal Gap: No gap established; fully grounded in the Social Services Act and Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: DOC-REQ-17.8 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.8) Nature of Procedural Requirement: Enforces the administrative duty to document oral applications. Legal Gap: No gap established; fully grounded in general administrative case management and investigation duties. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: DOC-REQ-17.9 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.9) Nature of Procedural Requirement: Specifies the procedural

flexibility to record applications as notes rather than on strict official forms. Legal Gap: No gap established; acts as a permitted relaxation of requirements aligned with administrative principles. Thematic Category: [DOC-REQ]

Requirement Reference: 10 Finding Reference: DOC-REQ-17.10 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.10) Nature of Procedural Requirement: Mandates recording the specific application date within the formal case file. Legal Gap: No gap established; fully covered by basic administrative case-management obligations. Thematic Category: [DOC-REQ]

Requirement Reference: 11 Finding Reference: DOC-REQ-17.11 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.11) Nature of Procedural Requirement: Dictates the placement of guidance documentation inside the vedtak of another requested social service. Legal Gap: The finding establishes that the specific format placement requirement lacks an explicit statutory anchor within the Act. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: DOC-REQ-17.12 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.12) Nature of Procedural Requirement: Instructs that applications receive an individual administrative assessment and result formally in an enkeltvedtak. Legal Gap: No gap established; tracking individual assessment from preparatory works and decision form from the Public Administration Act. Thematic Category: [ASSESS-PROC]

Requirement Reference: 13 Finding Reference: DOC-REQ-17.13 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.13) Nature of Procedural Requirement: Specifies the exact components required inside the vedtak, including grant/refusal status, granted provisions, and core reasoning. Legal Gap: No gap established; directly operationalizes the standard obligations from the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 14 Finding Reference: DOC-REQ-17.14 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.14) Nature of Procedural Requirement: Requires the start timing to be explicitly captured within the decision in the formal form of a concrete appointment or a strict deadline. Legal Gap: The finding establishes that while the Act leaves timing to open professional scheduling judgment, the circular escalates this into a mandatory, highly specified decision content element, structurally bypassing the allowed discretion. Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: DOC-REQ-17.15 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.15) Nature of Procedural Requirement: Dictates the substantive reasoning structure for the vedtak, specifically calling for the legal rule applied and factual decisive contexts. Legal Gap: No gap established; fully grounded in the standard Public Administration Act provisions. Thematic Category: [DOC-REQ]

Requirement Reference: 16 Finding Reference: DOC-REQ-17.16 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.16) Nature of Procedural Requirement: States that granting guidance must be documented via its own decision or wrapped into a combined decision covering other services. Legal Gap: No gap established; fully grounded in the Social Services Act and Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 17 Finding Reference: DOC-REQ-17.17 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.17) Nature of Procedural Requirement: Specifies that if guidance is linked to another social service decision, the provided guidance must be documented inside that decision. Legal Gap: The finding establishes that the specific format obligation requiring placement of documentation in a different service's decision has no clear explicit statutory anchor in the Act. Thematic Category: [DOC-REQ]

Requirement Reference: 18 Finding Reference: DOC-REQ-17.18 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.18) Nature of Procedural Requirement: Prohibits combining the formal decision for guidance with the KVP decision, mandating separation of administrative documents. Legal Gap: The finding establishes that neither § 17 nor § 29 requires separation of the decisions, making this requirement structurally contradictory to the circular's own flexibility and absent of statutory basis. Thematic Category: [DOC-REQ]

Requirement Reference: 19 Finding Reference: DOC-REQ-17.19 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.19) Nature of Procedural Requirement: Imposes an administrative mandate to draft an internal termination note or communication letter upon concluding the service. Legal Gap: The finding establishes that the specific format of generating an explicit "termination note/letter" at the conclusion is not prescribed by § 17 or standard administrative text. Thematic Category: [DOC-REQ]

Requirement Reference: 20 Finding Reference: DOC-REQ-17.20 Circular/Source: Veileder til sotjl. § 17 (DOC-REQ-17.20) Nature of Procedural Requirement: Dictates that the core professional actions executed and specific solutions chosen must be recorded in the formal termination note. Legal Gap: The finding establishes that the Act contains zero documentation mandates; forcing specific professional choices into a mandatory, retrospective record escalates the requirement heavily without legal authority. Thematic Category: [DOC-REQ]

Requirement Reference: 21 Finding Reference: DOC-REQ-17.21 Circular/Source: Kommunebrev 2025 (DOC-REQ-17.21) Nature of Procedural Requirement: Dictates using a vedtak form coupled with an interpretive mandate stating it shall secure the user's rights. Legal Gap: No gap established; the procedural form is grounded legally while the purpose clause acts interpretively without expanding binding obligations. Thematic Category: [DOC-REQ]

Requirement Reference: 22 Finding Reference: PROC-REQ-17.1 Circular/Source: R-35, § 4.17.1 (PROC-REQ-17.1) Nature of Procedural Requirement: Instructs case workers to assess and identify the individual guidance needs and tailor the administrative execution accordingly. Legal Gap: No gap established; directly tracks preparatory works and individual assessment intent. Thematic Category: [ASSESS-PROC]

Requirement Reference: 23 Finding Reference: PROC-REQ-17.2 Circular/Source: R-35, § 4.17.1 (PROC-REQ-17.2) Nature of Procedural Requirement: Highlights a specific mapping procedure geared toward children's needs conditionally within families receiving economic support. Legal Gap: The finding establishes that the specific conditional mapping obligation targeting this exact intersection lacks explicit statutory anchoring directly within § 17 itself. Thematic Category: [ASSESS-PROC]

Requirement Reference: 24 Finding Reference: PROC-REQ-17.3 Circular/Source: R-35, § 4.17.2.1 (PROC-REQ-17.3) Nature of Procedural Requirement: Imposes a mandatory holistic, multi-area procedural focus when conducting assessments and handling users' situations. Legal Gap: The finding establishes that the Act grants professional discretion regarding which specific areas are assessed; the circular overrides this by rigidly converting the scope into a comprehensive mandatory methodological obligation. Thematic Category: [ASSESS-PROC]

Requirement Reference: 27 Finding Reference: PROC-REQ-17.6 Circular/Source: R-35, § 4.17.2.4 (PROC-REQ-17.6) Nature of Procedural Requirement: Dictates the formal decision structure (vedtak) process for confirming the service. Legal Gap: No gap established; functionally identical to DOC-REQ-17.1 and fully grounded legally. Thematic Category: [DOC-REQ]

Requirement Reference: 28 Finding Reference: PROC-REQ-17.7 Circular/Source: R-35, § 4.17.2.4 (PROC-REQ-17.7) Nature of Procedural Requirement: Mandates assessing needs along with structurally recording the timeline specifying when guidance shall take place within the decision format. Legal Gap: The finding establishes that dictating timing as a mandatory inclusion within the formal decision converts an open professional scheduling element into a strict formal requirement lacking explicit statutory anchor. Thematic Category: [DOC-REQ]

Requirement Reference: 29 Finding Reference: PROC-REQ-17.8 Circular/Source: R-35, § 4.17.2.6 (PROC-REQ-17.8) Nature of Procedural Requirement: Enforces a proactive administrative obligation to independently assess user needs even without explicit applications. Legal Gap: No gap established; fully grounded in the general public administration duty for guidance and preparatory works. Thematic Category: [ASSESS-PROC]

Requirement Reference: 30 Finding Reference: PROC-REQ-17.9 Circular/Source: R-35, § 4.17.2.7 (PROC-REQ-17.9) Nature of Procedural Requirement: Restricts the financial assessment procedure strictly around mapping four mandatory checkpoints: income, expenses, assets, and debt. Legal Gap: The finding establishes that the circular converts the open normative standard over what constitutes relevant financial information into a fixed, mandatory four-element checklist unsupported by the text of the Act. Thematic Category: [ASSESS-PROC]

Requirement Reference: 31 Finding Reference: PROC-REQ-17.10 Circular/Source: R-35, § 4.17.2.7 (PROC-REQ-17.10) Nature of Procedural Requirement: Requires the case worker to execute an assessment step determining the necessary scale or intensity level for the counseling. Legal Gap: No gap established; determining the appropriate level aligns with tracking standard professional open judgment elements based on needs mapping. Thematic Category: [ASSESS-PROC]

Requirement Reference: 32 Finding Reference: PROC-REQ-17.11 Circular/Source: R-35, § 4.17.2.9 (PROC-REQ-17.11) Nature of Procedural Requirement: Imposes a duty to specifically inform and communicate about a distinct debt relief scheme to the user during assessment. Legal Gap: The finding establishes textual ambiguity where the substantive

duty strictly follows a separate law (gjeldsordningsloven) and linking its basis directly to § 17 is textually unclear. Thematic Category: [USER-COMM]

Requirement Reference: 33 Finding Reference: PROC-REQ-17.12 Circular/Source: Kommunebrev 2025 (PROC-REQ-17.12) Nature of Procedural Requirement: Repeats the procedural directive requiring a formal administrative decision format (vedtak) for the provision of the service. Legal Gap: No gap established; identical tracking requirements functionally authorized by administrative framework laws. Thematic Category: [DOC-REQ]

Requirement Reference: 34 Finding Reference: PROC-REQ-17.13 Circular/Source: Veileder sotjl. § 17 (PROC-REQ-17.13) Nature of Procedural Requirement: Requires executing a preliminary verification step to secure parental consent sequentially prior to initiating the application. Legal Gap: The finding establishes an ambiguity stating that while the requirement utilizes general legal capacity norms, enforcing the sequence exactly before applying directly through § 17 lacks clear textual necessity inside the Act. Thematic Category: [SEQUENCE]

Requirement Reference: 35 Finding Reference: PROC-REQ-17.14 Circular/Source: Veileder sotjl. § 17 (PROC-REQ-17.14) Nature of Procedural Requirement: Institutes a mandatory procedural triage phase requiring urgency to be evaluated actively during application processing. Legal Gap: The finding establishes that a specific, mandatory internal triage and clarification step purely for urgency relies on general principles but holds no explicit authorization textually inside § 17. Thematic Category: [SEQUENCE]

Requirement Reference: 36 Finding Reference: PROC-REQ-17.15 Circular/Source: Veileder sotjl. § 17 (PROC-REQ-17.15) Nature of Procedural Requirement: Defines that procedural handling incorporates an individual context assessment and formally finishes inside an enkeltvedtak. Legal Gap: No gap established; fully grounded in intent from preparatory works and administrative framework. Thematic Category: [ASSESS-PROC]

Requirement Reference: 37 Finding Reference: PROC-REQ-17.16 Circular/Source: Veileder øk. rådgivning (PROC-REQ-17.16) Nature of Procedural Requirement: Instructs that an initial scoping classification must determine if a case functionally aligns as economic counseling internally. Legal Gap: The finding establishes that inserting an initial formal case scoping prerequisite isn't conceptually anchored or specified inside the raw text of § 17. Thematic Category: [SEQUENCE]

Requirement Reference: 38 Finding Reference: PROC-REQ-17.17 Circular/Source: Veileder øk. rådgivning (PROC-REQ-17.17) Nature of Procedural Requirement: Dictates the procedural acquisition of documented power-of-attorney consent from users prior to gathering specific third-party papers. Legal Gap: The finding establishes that integrating this strict formalization sequence relies on separate privacy law, presenting textual unclarity when listed solely as a § 17 procedural rule. Thematic Category: [USER-COMM]

Requirement Reference: 39 Finding Reference: PROC-REQ-17.18 Circular/Source: Veileder øk. rådgivning (PROC-REQ-17.18) Nature of Procedural Requirement: Recommends evaluating household mapping limits to procedurally capture spousal/partner financial details. Legal Gap: No gap established; structured as a professional mapping

recommendation operating legitimately within the worker's open discretion mapping tools. Thematic Category: [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 18)

Requirement: Hensynene som ligger til grunn for vurderingen av hva som er et forsvarlig livsopphold for den enkelte skal begrunnes konkret og individuelt. Source: R-35 §18, seksjon 4.18.1.1 (DOC-REQ-18.1 / PROC-REQ-18.3).

Requirement: Avgjørelser om økonomisk stønad er enkeltvedtak. Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. Source: R-35 §18, seksjon 4.18.1.7 (DOC-REQ-18.2).

Requirement: Dersom vi velger et resultat som innebærer at barnets beste ikke får gjennomslag må dette begrunnes særskilt og skriftlig for å sikre etterprøvbarhet og barnets rettssikkerhet. Source: Barnets beste — veileder 20032024.pdf (DOC-REQ-18.3), linked to § 18.

Requirement: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste — veileder 20032024.pdf (DOC-REQ-18.4), linked to § 18.

Requirement: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. Source: Barnets beste — veileder 20032024.pdf (DOC-REQ-18.5), linked to § 18.

Requirement: Egenerklæring fra søkeren: [...] kan også være muntlig, og skrives ned i journalnotat av NAV-kontoret. Source: Veileder økonomisk stønad 2022 (oppdatert juni 2024) (DOC-REQ-18.6), linked to § 18.

Requirement: Råd og veiledning gitt i forbindelse med innvilgelse eller avslag av andre sosiale tjenester skal omtales i innvilgelsesvedtaket eller avslaget. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-18.7), applied to § 18.

Requirement: På bakgrunn av dette er det nødvendig at Nav-kontoret tar et selvstendig ansvar for at saken er tilstrekkelig opplyst og at oppholdsstatus er dokumentert i saker der et av inngangskriteriene for tjenester, arbeidsrettet oppfølging og tiltak etter loven er lovlig

opphold i riket. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere juni 2025 (DOC-REQ-18.8), linked to § 18.

Requirement: Hovedprinsippet for behandling av søknad om økonomisk stønad er at det skal foretas konkrete og individuelle vurderinger av hjelpebehov.... Source: R-35 §18, seksjon 4.18 (PROC-REQ-18.1).

Requirement: Nav-kontoret skal foreta en vurdering av tjenestemottakers helhetlige situasjon.... Source: R-35 §18 (PROC-REQ-18.2).

Requirement: Nav-kontoret skal utrede hjelpebehovet i samarbeid med vedkommende. Source: R-35 §18 (PROC-REQ-18.4).

Requirement: Søknaden må vurderes raskt i en nødssituasjon, ofte samme dag som den er mottatt.... Source: R-35 §18 (PROC-REQ-18.5).

Requirement: Hvis tjenestemottaker har barn, skal det tas særlige hensyn til deres behov i alle vurderinger som foretas. Source: R-35 §18 (PROC-REQ-18.6).

Requirement: ...er det viktig at Nav-kontoret foretar en grundig kartlegging av tjenestemottakers helhetlige situasjon, og innhenter de opplysninger som er nødvendige i saken. Source: R-35 §18 (PROC-REQ-18.7).

Requirement: NAV-kontoret bør innledningsvis i kartleggingen søke å avklare hvor lenge brukeren vil ha behov for hjelp fra NAV. Source: Veileder økonomisk stønad 2022 (PROC-REQ-18.8), linked to § 18.

Requirement: NAV-kontoret må gjøre en konkret og individuell vurdering av hvordan opplysningene skal dokumenteres. Source: Veileder økonomisk stønad 2022 (PROC-REQ-18.9), linked to § 18.

Requirement: NAV-kontoret må kartlegge hvor store faktiske utgifter enkeltpersoner har.... Source: Veileder økonomisk stønad 2022 (PROC-REQ-18.10), linked to § 18.

Requirement: ...er det viktig at Nav-kontoret konkret og individuelt vurderer hvilke aktiviteter som er hensiktsmessige.... Source: Kommunebrev 2025 (PROC-REQ-18.11), linked to § 18.

Step 2 — Classify Each Requirement

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding states this requirement merely adds procedural specificity for how a decision must be justified in writing, without eliminating substantive discretion.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding notes that this requirement restates existing mandatory procedural law regarding administrative case processing and decisions.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding explicitly describes this as a "procedural documentation requirement" detailing how a specific decision is to be recorded. Ambiguous — recommend human legal review.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding establishes that this mandates a methodology for documenting the assessment and how it is recorded. Ambiguous — recommend human legal review.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding categorizes this under how-discretion because it dictates the documentation practice and wording for child-related information in case files. Ambiguous — recommend human legal review.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding states this specifies an acceptable evidentiary method for gathering and recording an applicant's self-declarations.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding states that this governs the mandatory written content of a § 18 decision letter. Ambiguous — recommend human legal review.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding concludes that this specifies what factual evidentiary elements must be formally documented to assess an eligibility condition. Ambiguous — recommend human legal review.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding establishes this as a "procedural restatement" specifying the operational methodology for conducting the factual needs assessment.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding states this dictates the investigative scope regarding "what facts are gathered and how" for the assessment.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding notes that this specifies HOW the evidence is gathered by mandating a collaborative investigative method.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding explains that this involves procedural how-discretion by setting practical guidance for the timing and speed of emergency processing.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The finding explicitly establishes that this introduces a "substantive weighting obligation" requiring special consideration for children's needs in all assessments, restricting substantive outcome discretion. *(Will not proceed to Step 3).*

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding concludes this reflects the procedural duty to investigate sufficiently, governing what information is gathered and how thoroughly the situation is mapped.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding describes this as a "methodological recommendation" dictating the sequencing of the initial assessment process.

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding establishes this requires an individualized approach solely regarding documentation methodology and "how to document".

Requirement: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding notes that this dictates what factual expenses must be mapped as a necessary evidentiary procedure, without narrowing substantive discretion on outcomes.

Requirement: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The finding concludes that this entails "setting and assessing activity conditions for economic support", which is a substantive threshold. *(Will not proceed to Step 3).*

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: KRAV 1 av 18 (DOC-REQ-18.1 / PROC-REQ-18.3) Circular/Source: R-35 §18, seksjon 4.18.1.1 Nature of Procedural Requirement: The basis for assessing adequate subsistence must be justified concretely and individually in writing. Legal Gap: N/A — authorization established. The open normative standard inherently requires individualized assessment, and the Public Administration Act (fvl. §§ 24–25) independently mandates reasons be stated. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: KRAV 2 av 18 (DOC-REQ-18.2) Circular/Source: R-35 §18, seksjon 4.18.1.7 Nature of Procedural Requirement: Must treat decisions as individual decisions (enkeltvedtak) and follow statutory case processing and good administrative practices. Legal Gap: N/A — this is directly grounded in fvl. § 2(b) and restates existing mandatory procedural law, creating no new requirements. Thematic Category: [OTHER] General administrative procedure and process compliance.

Requirement Reference: 3 Finding Reference: KRAV 3 av 18 (DOC-REQ-18.3) Circular/Source: Barnets beste — veileder 20032024.pdf Nature of Procedural Requirement: Must provide a specific written justification if a decision results in the child's best interests not prevailing. Legal Gap: § 18 contains no express authorization for a mandatory specific written justification requirement when the child's best interests are overridden; the basis, if any, lies in external sources (UN Convention/Constitution). Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: KRAV 4 av 18 (DOC-REQ-18.4) Circular/Source: Barnets beste — veileder 20032024.pdf Nature of Procedural Requirement: Must document the child's best interests assessment so others can review the evaluations made. Legal Gap: § 18 contains no provision authorizing or requiring documentation of child's best interests assessments; the basis lies in external frameworks and documentation principles rather than § 18's text. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: KRAV 5 av 18 (DOC-REQ-18.5) Circular/Source: Barnets beste — veileder 20032024.pdf Nature of Procedural Requirement: Written information about the child in the case file should be neutrally descriptive and limited to what is strictly necessary. Legal Gap: The instruction on how to describe children in case files lacks an express basis in § 18; plausible authorization routes exist indirectly via external data protection and administrative standards. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: KRAV 6 av 18 (DOC-REQ-18.6) Circular/Source: Veileder økonomisk stønad 2022 (oppdatert juni 2024) Nature of Procedural Requirement: Allows self-declarations from the applicant to be given verbally and written down by the office in a journal note. Legal Gap: N/A — this is a permissive statement about one acceptable evidentiary method, consistent with fvl. § 17's general investigation duty. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: KRAV 7 av 18 (DOC-REQ-18.7) Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Advice and guidance given in connection with granting or denying other social services must be mentioned in the decision letter. Legal Gap: § 18 contains no provision requiring § 17 services be mentioned in § 18 decisions; authority for this specific requirement derives arguably from § 17 and fvl. §§ 24–25 rather than § 18's text. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: KRAV 8 av 18 (DOC-REQ-18.8) Circular/Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere juni 2025 Nature of Procedural Requirement: Must independently ensure the case is sufficiently investigated and residence status explicitly documented for entry criteria. Legal Gap: § 18 does not itself specify lawful residence as a condition or authorize a specific documentation requirement for it; the criterion derives primarily from § 2. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: KRAV 9 av 18 (PROC-REQ-18.1) Circular/Source: R-35 §18, seksjon 4.18 Nature of Procedural Requirement: Must conduct concrete and individual assessments of the applicant's need for assistance. Legal Gap: N/A — the requirement for concrete and individual assessment is directly implied by the open normative standard 'forsvarlig livsopphold' and expressly confirmed in deep law. Thematic Category: [ASSESS-PROC]

Requirement Reference: 10 Finding Reference: KRAV 10 av 18 (PROC-REQ-18.2) Circular/Source: R-35 §18 Nature of Procedural Requirement: Must conduct a holistic assessment of the service recipient's overall situation. Legal Gap: N/A — this circular requirement is an exact restatement of Sivilombudet's authoritative interpretation of § 18 in deep law. Thematic Category: [ASSESS-PROC]

Requirement Reference: 11 Finding Reference: KRAV 11 av 18 (PROC-REQ-18.4) Circular/Source: R-35 §18 Nature of Procedural Requirement: Must investigate the need for help in collaboration with the person concerned. Legal Gap: N/A — this has sufficient basis in § 18 read with fvl. § 17, reflecting the standard of adequate investigation and principle of party participation. Thematic Category: [ASSESS-PROC]

Requirement Reference: 12 Finding Reference: KRAV 12 av 18 (PROC-REQ-18.5) Circular/Source: R-35 §18 Nature of Procedural Requirement: Must process applications quickly in an emergency situation, often the same day it is received. Legal Gap: N/A — the general principle of rapid emergency assessment is grounded in deep law; the "often same day" formulation is practical guidance rather than a strict mandate. Thematic Category: [SEQUENCE]

Requirement Reference: 14 Finding Reference: KRAV 14 av 18 (PROC-REQ-18.7) Circular/Source: R-35 §18 Nature of Procedural Requirement: Must conduct a thorough mapping of the recipient's holistic situation and gather necessary information. Legal Gap: N/A — the requirement to conduct thorough mapping directly reflects the duty to investigate sufficiently before making a decision under fvl. § 17. Thematic Category: [ASSESS-PROC]

Requirement Reference: 15 Finding Reference: KRAV 15 av 18 (PROC-REQ-18.8) Circular/Source: Veileder økonomisk stønad 2022 Nature of Procedural Requirement: Should initially attempt to clarify how long the user will need assistance from NAV during mapping. Legal Gap: N/A — clarifying duration at the outset is a reasonable methodological recommendation consistent with individualized assessment requirements and self-sufficiency goals. Thematic Category: [SEQUENCE]

Requirement Reference: 16 Finding Reference: KRAV 16 av 18 (PROC-REQ-18.9) Circular/Source: Veileder økonomisk stønad 2022 Nature of Procedural Requirement: Must make a concrete and individual assessment regarding how the gathered information should be documented. Legal Gap: N/A — the investigation duty and the individualized assessment requirement inherent in § 18 collectively support requiring individualized assessment of documentation methods. Thematic Category: [DOC-REQ]

Requirement Reference: 17 Finding Reference: KRAV 17 av 18 (PROC-REQ-18.10) Circular/Source: Veileder økonomisk stønad 2022 Nature of Procedural Requirement: Must map out the actual expenses that the individual has. Legal Gap: N/A — mapping actual expenses is logically necessary as a factual input to assess the open normative standard of 'forsvarlig livsopphold' for individual cases. Thematic Category: [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 19)

Requirement 1: Stønad i særlige tilfeller skal bidra til å øke muligheten for å realisere lovens målsettinger for den enkelte, etter en konkret og individuell vurdering. Source: R-35 Para 4.19.1.

Requirement 2: Hvis stønad til livsopphold avslås, skal det vurderes om stønad i særlig tilfeller kan innvilges etter denne bestemmelsen. Source: R-35 Para 4.19.1.

Requirement 3: I vurderingen av om stønad i særlige tilfeller skal gis, skal det tas hensyn til om tjenestemottakers livssituasjon er blitt, eller står i fare for å bli, så vanskelig at vedkommende ikke kommer videre uten hjelp. Source: R-35 Para 4.19.1.

Requirement 4: Tjenestemottakers behov må likevel vurderes ut fra den nåværende situasjonen, og økonomisk stønad til livsopphold kan innvilges til det er mulig å benytte de andre mulighetene. Source: R-35 Para 4.19.1.3.

Requirement 5: Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. Source: R-35 Para 4.19.1.4.

Requirement 6: Nav-kontoret bør derfor vurdere om personer som mottar økonomisk stønad kan ha behov for stønad til særskilte formål. Source: Kommunebrev 2025.

Requirement 7: ...det skal alltid vurderes om stønad kan innvilges etter denne bestemmelsen. Source: Veileder om økonomisk stønad etter sosialtjenesteloven.

Requirement 8: NAV-kontoret bør: ... vurdere å gi stønad etter § 19 dersom bruker er i en vanskelig livssituasjon. Source: Veileder om økonomisk stønad etter sosialtjenesteloven.

Requirement 9: Det må foreligge opplysninger i saken som dokumenterer om søker har et hjelpebehov eller ikke. Source: Veileder om økonomisk stønad etter sosialtjenesteloven 2022.

Requirement 10: NAV-kontoret må gjøre en konkret og individuell vurdering av hvordan opplysningene skal dokumenteres. Source: Veileder om økonomisk stønad etter sosialtjenesteloven 2022.

Requirement 11: Dersom vi velger et resultat som innebærer at barnets beste ikke får gjennomslag må dette begrunnes særskilt og skriftlig for å sikre etterprøvbarhet og barnets rettssikkerhet. Source: Barnets beste — veileder.

Requirement 12: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste — veileder.

Requirement 13: Nav-kontoret har plikt til å nedtegne muntlige søknader. Source: Veileder til sosialtjenesteloven § 17.

Requirement 14: Søknadstidspunktet vil være tidspunktet for innlevering av en skriftlig søknad eller når behovet ble meldt, og dette tidspunktet skal fremgå av saken. Source: Veileder til sosialtjenesteloven § 17.

Requirement 15: ...må EØS-borgeren dokumentere at han har lovlig opphold, evt. dokumentere at han har opparbeidet seg varig oppholdsrett, på søknadstidspunktet for sosiale tjenester. Source: Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere.

Step 2 — Classify Each Requirement

Requirement 1 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement operationalises the legal standard and directs the substantive purpose of the aid, defining what the decision must help achieve. *Note: Will not proceed to Step 3 for this requirement.*

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates a sequential administrative step, mandating an assessment of § 19 every time a § 18 claim is denied.

Requirement 3 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement concerns the legal content of the decision by identifying a substantive factor that must be weighed when applying the open normative standard. *Note: Will not proceed to Step 3 for this requirement.*

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review Justification: While framed as an evidentiary procedure dictating a temporal perspective on need, it overrides other circumstances and fundamentally alters the substantive threshold for aid.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement specifically directs administrative compliance with existing statutory laws and norms governing case processing.

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement establishes an administrative step instructing the office to proactively consider assessing a specific group of long-term recipients.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement imposes a universal, mandatory procedural obligation to always assess the provision in every case.

Requirement 8 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement outlines a soft procedural recommendation to consider an assessment outcome without mandating the decision itself.

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates that factual records must be produced and kept in the case file to document the applicant's need.

Requirement 10 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement mandates an administrative meta-assessment detailing the procedure for how documentation itself should be structured.

Requirement 11 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement prescribes an elevated, specific written form to document and justify a specific decision outcome affecting children.

Requirement 12 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates that a specific type of evaluation (child's best interests) must be formally documented as a record in the case file.

Requirement 13 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement governs the administrative intake procedure by mandating the written recording of oral applications.

Requirement 14 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement is an administrative documentation rule dictating that the exact date an application was submitted must be recorded in the file.

Requirement 15 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement prescribes a specific documentary gatekeeping procedure that EEA citizens must fulfill to access the assessment process.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** PROC-REQ 19.2 **Circular/Source:** R-35 Para 4.19.1 **Nature of Procedural Requirement:** A mandatory sequential step requiring an assessment of § 19 every time an application for § 18 is denied. **Legal Gap:** § 19 establishes a permissive power ("kan") without imposing any mandatory procedural duty to consider that power upon a § 18 refusal, thereby overriding the authority's whether-discretion. **Thematic Category:** [SEQUENCE]

Requirement Reference: 4 **Finding Reference:** PROC-REQ 19.4 **Circular/Source:** R-35 Para 4.19.1.3 **Nature of Procedural Requirement:** A mandatory evidentiary perspective dictating that needs must be assessed based on the present situation rather than future possibilities. **Legal Gap:** § 19 ("trenger det") provides no explicit instruction on the temporal framing of need assessment, and the circular eliminates the authority's freedom to weigh unutilized future resources. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** PROC-REQ 19.5 **Circular/Source:** R-35 Para 4.19.1.4 **Nature of Procedural Requirement:** Case processing must follow statutory law, the Public Administration Act, and unwritten norms of good administrative practice.

Legal Gap: No gap exists (HAS_HJEMMEL); this is a restatement of independent procedural obligations that do not shadow-bind or restrict the substantive discretion granted by § 19. **Thematic Category:** [OTHER] (General case processing compliance)

Requirement Reference: 6 **Finding Reference:** PROC-REQ 19.6 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** A professional recommendation to proactively evaluate if long-term recipients of economic support need aid for special purposes. **Legal Gap:** § 19 does not distinguish between recipient types or create a category-specific duty for proactive review, though the soft recommendation does not escalate the law's permissive language. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** PROC-REQ 19.7 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven **Nature of Procedural Requirement:** A universal mandatory administrative obligation to always assess whether aid can be granted under this provision. **Legal Gap:** § 19 establishes a purely permissive power ("kan") with no mandatory assessment duty; the circular converts this into an obligatory procedural track, overriding case-by-case discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** PROC-REQ 19.8 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven **Nature of Procedural Requirement:** A soft professional recommendation to consider granting aid under § 19 when a user is in a difficult life situation. **Legal Gap:** No gap exists (HAS_HJEMMEL); the circular strictly grounds its recommendation in § 19's own statutory language without overriding the municipality's whether-discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** DOC-REQ 4.19.1.1 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven 2022 **Nature of Procedural Requirement:** Information must exist in the case file documenting whether the applicant requires help. **Legal Gap:** No gap exists (HAS_HJEMMEL); this is a logical procedural corollary of the condition "trenger det" and aligns with the general investigation duty in fvl. § 17 without overriding open evidence-discretion. **Thematic Category:** [DOC-REQ]

Requirement Reference: 10 **Finding Reference:** DOC-REQ 4.19.1.2 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven 2022 **Nature of Procedural Requirement:** The local office must conduct a concrete and individual meta-assessment of how case information is documented. **Legal Gap:** § 19 contains no provision regarding documentation methodology, and general administrative law does not explicitly mandate an individual assessment on how documentation must be structured. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** DOC-REQ 4.19.1.3 **Circular/Source:** Barnets beste — veileder **Nature of Procedural Requirement:** A specific, elevated written justification must be produced if a decision outcome overrules the best interests of a child. **Legal Gap:** § 19 leaves the form and content of decisions entirely open and contains no specific reference to children, meaning the circular converts open how-discretion into a mandatory specific procedural form-requirement. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** DOC-REQ 4.19.1.4 **Circular/Source:** Barnets beste — veileder **Nature of Procedural Requirement:** The authority must formally

document its considerations of the child's best interests (barnets beste). **Legal Gap:** § 19's permissive text lacks any requirement to conduct or document a specific child welfare assessment, effectively adding an extrinsic mandatory content and documentation requirement. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** DOC-REQ 4.19.1.5 **Circular/Source:** Veileder til sosialtjenesteloven § 17 **Nature of Procedural Requirement:** Administrative duty to formally record oral applications. **Legal Gap:** No gap exists in relation to § 19 (HAS_HJEMMEL); it is a universally applicable intake-procedure obligation rooted independently in sosialtjenesteloven § 17 and general administrative principles. **Thematic Category:** [DOC-REQ]

Requirement Reference: 14 **Finding Reference:** DOC-REQ 4.19.1.6 **Circular/Source:** Veileder til sosialtjenesteloven § 17 **Nature of Procedural Requirement:** The exact application date (when submitted or reported) must be recorded and appear in the case file. **Legal Gap:** No gap exists (HAS_HJEMMEL); this is a universal administrative rule with a clear statutory basis in independent record-keeping obligations that do not touch § 19's substantive discretion. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** DOC-REQ 4.19.1.7 **Circular/Source:** Veileder for Nav-kontoret ved vurdering av lovlig opphold for EØS-borgere **Nature of Procedural Requirement:** EEA citizens must provide specific documentation of lawful residence or permanent right of residence at the time of application to access the process. **Legal Gap:** § 19 imposes no nationality or residence-based evidentiary burden for access, meaning the circular converts the open factual gateway into a mandatory fixed documentation criterion for a defined population. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 20)

Requirement 1: "...forutsatt at det i vedtaket om stønad er informert om muligheten for slik reduksjon." Source: R-35 Para 20 — beginning Requirement 2: "Avgjørelse om å sette vilkår skal fremgå av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — beginning Requirement 3: "Vilkår skal begrunnes..." Source: R-35 Para 20 — beginning Requirement 4: "...og det må tydelig fremkomme av vedtaket hva plikten innebærer, hva som kreves for at plikten skal anses oppfylt..." Source: R-35 Para 20 — beginning Requirement 5: "...og hva som kan bli konsekvensene av eventuelle brudd på vilkårene." Source: R-35 Para 20 — beginning Requirement 6: "Hvis konsekvensen av vilkårsbrudd skal iverksettes må det fattes et nytt vedtak." Source: R-35 Para 20 — beginning Requirement 7: "Hvis vilkåret endres, skal det fattes nytt vedtak." Source: R-35 Para 20 — beginning Requirement 8: "Nav-kontoret skal derfor fatte et skriftlig, begrunnet vedtak som uttrykkelig viser at det er satt vilkår, hva vilkåret går ut på og konsekvensen hvis vilkåret brytes." Source: R-35 Para 20 — middle Requirement 9: "Vedtaket må også opplyse om adgangen til å klage på vilkåret." Source: R-35 Para 20 — middle Requirement 10: "Konsekvensen ved brudd på vilkår skal klart fremkomme av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — end Requirement 11: "Det kan ikke settes vilkår etter sotjl. §§ 20 eller 20 a i vedtak om opplysning, råd og veiledning etter sotjl. § 17." Source: Veileder sotjl § 17 Requirement 12: "Hvis brukeren imidlertid ønsker opplysning, råd og veiledning, kan vedkommende ha nytte av at det stilles vilkår om å søke om tjenesten, eller møte til samtaler, i vedtak om økonomisk stønad." Source: Veileder sotjl § 17 Requirement 13: "Det skal ikke settes vilkår for tildeling av økonomisk stønad i en nødssituasjon." Source: R-35 Para 20 — beginning Requirement 14: "Avgjørelse om å sette vilkår skal fremgå av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — beginning Requirement 15: "Vilkår skal begrunnes og det må tydelig fremkomme av vedtaket hva plikten innebærer..." Source: R-35 Para 20 — beginning Requirement 16: "Hvis konsekvensen av vilkårsbrudd skal iverksettes må det fattes et nytt vedtak." Source: R-35 Para 20 — beginning Requirement 17: "Hvis vilkåret endres, skal det fattes nytt vedtak." Source: R-35 Para 20 — beginning Requirement 18: "Før det settes vilkår, skal Nav-kontoret alltid foreta en konkret individuell vurdering av om vilkår er hensiktsmessig..." Source: R-35 Para 20 — middle Requirement 19: "For alle typer vilkår skal Nav-kontoret foreta en konkret individuell vurdering av hvor tyngende vilkåret er for den enkelte tjenestemottaker..." Source: R-35 Para 20 — middle Requirement 20: "Det må foretas en konkret individuell vurdering av hvilke arbeidsoppgaver som passer for den enkelte." Source: R-35 Para 20 — middle Requirement 21: "Nav-kontoret må derfor sørge for at tjenestemottakeren har fått mulighet til å uttale seg før vedtaket om konsekvensen av vilkårsbruddet fattes." Source: R-35 Para 20 — end Requirement 22: "Ved brudd på vilkår skal det gjøres en konkret og individuell vurdering av om det skal fattes vedtak om at konsekvensen skal gjennomføres." Source: R-35 Para 20 — end Requirement 23: "Nav-kontoret skal alltid sikre at barns behov blir ivaretatt, og det må derfor foretas en konkret og individuell vurdering av hvilken betydning konsekvensene av vilkårsbruddet får for barna." Source: R-35 Para 20 — end Requirement 24: "Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet." Source: Kommunebrev 2025 Requirement 25: "Ved tildeling av økonomisk sosialhjelp til personer under 30 år, skal det stilles vilkår om aktivitet med mindre tungtveiende grunner taler mot det." Source: Kommunebrev 2025 Requirement 26: "Vilkår om salg av eiendeler kan uansett ikke stilles som en forutsetning for å få sitt hjelpebehov vurdert, og skal som hovedregel settes i samarbeid med den som søker..." Source: Veileder øk. stønad Requirement 27: "Det kan

ikke settes vilkår etter sotjl. §§ 20 eller 20 a i vedtak om opplysning, råd og veiledning etter sotjl. § 17." Source: Veileder sotjl § 17

Step 2 — Classify Each Requirement

Requirement 1 [PROCEDURAL/DOCUMENTATION] Justification: Specifies the mandatory prior information required in the administrative decision document.

Requirement 2 [PROCEDURAL/DOCUMENTATION] Justification: Dictates how the permissive power, once exercised, must be explicitly documented in the decision.

Requirement 3 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the administrative process of providing reasons for conditions in the decision.

Requirement 4 [PROCEDURAL/DOCUMENTATION] Justification: Specifies the detailed administrative content that must be included when documenting a condition.

Requirement 5 [PROCEDURAL/DOCUMENTATION] Justification: Dictates what information concerning breach consequences must be included in the decision.

Requirement 6 [PROCEDURAL/DOCUMENTATION] Justification: Specifies the administrative procedure (making a new decision) required to execute consequences of a breach.

Requirement 7 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the procedure required to modify an existing condition.

Requirement 8 [PROCEDURAL/DOCUMENTATION] Justification: Synthesizes written form, reasoning, and explicit content requirements into an administrative documentation rule.

Requirement 9 [PROCEDURAL/DOCUMENTATION] Justification: Imposes a mandatory duty to include appeal rights information in the administrative communication.

Requirement 10 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the qualitative degree of clarity required for documenting consequence information in the decision.

Requirement 11 [SUBSTANTIVE LEGAL OBLIGATION] Justification: Restricts the substantive legal scope of the discretionary power, excluding specific decision contexts from its exercise. *(Noted, will not proceed to Step 3)*

Requirement 12 [SUBSTANTIVE LEGAL OBLIGATION] Justification: Confirms a permissive substantive option to attach a specific type of condition (seeking counselling) to economic support decisions. *(Noted, will not proceed to Step 3)*

Requirement 13 [SUBSTANTIVE LEGAL OBLIGATION] Justification: Eliminates the authority's legal discretion to set conditions within a specific factual context (emergency situations),. *(Noted, will not proceed to Step 3)*

Requirement 14 [PROCEDURAL/DOCUMENTATION] Justification: Dictates how condition decisions are recorded and presented administratively.

Requirement 15 [PROCEDURAL/DOCUMENTATION] Justification: Mandates how conditions and their explicit content must be communicated in the decision documentation.

Requirement 16 [PROCEDURAL/DOCUMENTATION] Justification: Specifies the procedural execution required (new decision) when the permissive option to respond to a breach is exercised.

Requirement 17 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the required administrative procedure for changing an existing condition.

Requirement 18 [PROCEDURAL/DOCUMENTATION] Justification: Mandates a specific individual assessment process as a pre-condition before exercising substantive discretion.

Requirement 19 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the procedural implementation of assessing the statutory proportionality requirement for the individual.

Requirement 20 [PROCEDURAL/DOCUMENTATION] Justification: Dictates the procedural implementation of determining which tasks meet the statutory standard of "passende".

Requirement 21 [PROCEDURAL/DOCUMENTATION] Justification: Mandates a user communication process (the right to be heard) before making an adverse administrative decision regarding a breach.

Requirement 22 [PROCEDURAL/DOCUMENTATION] Justification: Mandates a concrete assessment process before exercising the choice over whether to reduce benefits.

Requirement 23 [PROCEDURAL/DOCUMENTATION] Justification: Mandates a child-welfare assessment process as an input into the discretionary decision.

Requirement 24 [PROCEDURAL/DOCUMENTATION] Justification: Mandates a sequential assessment step (checking KVP eligibility) before setting an activity condition.

Requirement 25 [SUBSTANTIVE LEGAL OBLIGATION] Justification: Dictates the substantive legal obligation to apply conditions to a specific demographic (under 30) along with its statutory exception. *(Noted, will not proceed to Step 3)*

Requirement 26 [PROCEDURAL/DOCUMENTATION] Justification: Ambiguous — recommend human legal review (combines substantive restriction on prerequisites with a mandatory procedural rule requiring condition-setting to occur in collaboration with the applicant),.

Requirement 27 [SUBSTANTIVE LEGAL OBLIGATION] Justification: Restricts the legal scope of the power by explicitly prohibiting conditions in advice and guidance decisions. *(Noted, will not proceed to Step 3)*

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** DOC-REQ-20.1 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** The decision for economic support must inform the user about the possibility of benefit reduction upon breach. **Legal Gap:** N/A — the statutory precondition ('forutsatt at det i vedtaket om stønad er informert om muligheten for slik reduksjon') directly authorizes and in fact requires this specific element. **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** DOC-REQ-20.2 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** The decision to set a condition must be explicitly stated in the grant decision for economic support. **Legal Gap:** § 20 contains no explicit requirement that the decision to set conditions must appear in the grant decision itself rather than a separate decision; the specific textual basis is absent. **Thematic Category:** [DOC-REQ]

Requirement Reference: 3 **Finding Reference:** DOC-REQ-20.3 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** Conditions must be reasoned. **Legal Gap:** N/A — Preparatory works (Prop. 39 L) and general admin law explicitly provide a direct normative basis for the reasoning obligation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** DOC-REQ-20.4 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** The decision must clearly state what the duty entails and what is required for fulfillment. **Legal Gap:** § 20 contains no specification of what content the decision must include beyond the conditions themselves; this precise formulation lacks a direct textual anchor. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** DOC-REQ-20.5 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** The decision must outline what the consequences of potential breaches will be. **Legal Gap:** N/A — the statutory text is entirely prescriptive for this specific element. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** DOC-REQ-20.6 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** A new decision must be generated if the consequences of a breach are to be implemented. **Legal Gap:** N/A — Preparatory works explicitly state that a separate decision must be made if support is to be reduced. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** DOC-REQ-20.7 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** A new decision must be generated if the condition is changed. **Legal Gap:** § 20 contains no provision addressing what must happen when conditions are changed; it is textually unanchored in § 20 itself. **Thematic Category:** [DOC-REQ]

Requirement Reference: 8 **Finding Reference:** DOC-REQ-20.8 **Circular/Source:** R-35 Para 20 — middle **Nature of Procedural Requirement:** Nav must draft a written, reasoned decision expressly showing that a condition is set, its content, and breach consequences. **Legal Gap:** The specification that the decision must expressly ("uttrykkelig") show all three elements is a level of specificity not stated in § 20. **Thematic Category:** [DOC-REQ]

Requirement Reference: 9 **Finding Reference:** DOC-REQ-20.9 **Circular/Source:** R-35 Para 20 — middle **Nature of Procedural Requirement:** The decision must inform the user about the right to appeal the condition. **Legal Gap:** N/A — Forvaltningsloven § 27 creates a mandatory obligation independent of the power in § 20. **Thematic Category:** [USER-COMM]

Requirement Reference: 10 **Finding Reference:** DOC-REQ-20.10 **Circular/Source:** R-35 Para 20 — end **Nature of Procedural Requirement:** The consequence of a breach must clearly appear in the economic support decision. **Legal Gap:** N/A — The circular implements the statutory precondition by adding a quality standard ("klart") to what the statute already requires. **Thematic Category:** [DOC-REQ]

Requirement Reference: 14 **Finding Reference:** PROC-REQ-20.2 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** The decision to set conditions must be visible in the grant decision for economic support. **Legal Gap:** § 20 contains no explicit requirement that the decision appear in the grant decision itself. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** PROC-REQ-20.3 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** Conditions must be reasoned and explicitly state what the duty entails in the decision. **Legal Gap:** N/A — The reasoning and content-clarity obligations are grounded in preparatory works and general administrative law. **Thematic Category:** [DOC-REQ]

Requirement Reference: 16 **Finding Reference:** PROC-REQ-20.4 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** A new decision must be produced to implement a breach consequence. **Legal Gap:** N/A — Preparatory works (Prop. 39 L) directly mandate an independent decision for reductions. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** PROC-REQ-20.5 **Circular/Source:** R-35 Para 20 — beginning **Nature of Procedural Requirement:** A new decision must be made if conditions are changed. **Legal Gap:** No explicit provision in § 20 dictates the procedure when conditions are modified. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** PROC-REQ-20.6 **Circular/Source:** R-35 Para 20 — middle **Nature of Procedural Requirement:** Nav must always perform a concrete individual assessment of whether a condition is appropriate before setting it. **Legal Gap:** § 20 sets no requirement for a mandatory prior individual assessment as a pre-condition before exercising the permissive 'kan' power. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 19 **Finding Reference:** PROC-REQ-20.7 **Circular/Source:** R-35 Para 20 — middle **Nature of Procedural Requirement:** Nav must perform a concrete individual assessment of how burdensome the condition is for the individual. **Legal Gap:** N/A — Assessing how burdensome the condition is implements the statutory requirement that conditions must not be "uforholdsmessig byrdefulle". **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 20 **Finding Reference:** PROC-REQ-20.8 **Circular/Source:** R-35 Para 20 — middle **Nature of Procedural Requirement:** Nav must assess which specific tasks are appropriate for the individual. **Legal Gap:** N/A — This implements the statutory open normative term "passende arbeidsoppgaver" which intrinsically mandates individual assessment. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 21 **Finding Reference:** PROC-REQ-20.9 **Circular/Source:** R-35 Para 20 — end **Nature of Procedural Requirement:** Nav must ensure the recipient has an opportunity to be heard before a decision on breach consequences is made. **Legal Gap:** N/A — Forvaltningsloven § 17 imposes a mandatory prescriptive duty to hear parties independent of § 20. **Thematic Category:** [USER-COMM]

Requirement Reference: 22 **Finding Reference:** PROC-REQ-20.10 **Circular/Source:** R-35 Para 20 — end **Nature of Procedural Requirement:** Nav must conduct a concrete and individual assessment of whether to implement a consequence when a condition is breached. **Legal Gap:** N/A — Preparatory works explicitly require assessing the cause and special circumstances before implementing breach consequences. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 23 **Finding Reference:** PROC-REQ-20.11 **Circular/Source:** R-35 Para 20 — end **Nature of Procedural Requirement:** Nav must assess the significance and impact that breach consequences will have on children. **Legal Gap:** N/A — Preparatory works (Prop. 13 L) offer a direct normative basis for assessing child needs prior to implementing consequences. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 24 **Finding Reference:** PROC-REQ-20.12 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** The right to a qualification programme (KVP) must be evaluated sequentially before an activity condition is set. **Legal Gap:** § 20 imposes no sequencing requirement regarding KVP eligibility assessment; KVP rights are governed by separate sections. **Thematic Category:** [SEQUENCE]

Requirement Reference: 26 **Finding Reference:** PROC-REQ-20.14 **Circular/Source:** Veileder øk. stønad **Nature of Procedural Requirement:** Condition-setting must, as a main rule, be done in collaboration with the applicant. **Legal Gap:** The statute leaves entirely open *how* conditions are formulated and through what process; the circular replaces this open process judgment with a mandatory procedural default rule of collaboration (shadow binding the how-discretion). **Thematic Category:** [USER-COMM]

Step 1 — Extract All Requirements for Process inflation(§ 20a)

Requirement: "...forutsatt at det i vedtaket om stønad er informert om muligheten for slik reduksjon." Source: R-35 Para 20 — beginning Requirement: "Avgjørelse om å sette vilkår skal fremgå av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — beginning Requirement: "Vilkår skal begrunnes..." Source: R-35 Para 20 — beginning

Requirement: "...og det må tydelig fremkomme av vedtaket hva plikten innebærer, hva som kreves for at plikten skal anses oppfylt..." Source: R-35 Para 20 — beginning Requirement: "...og hva som kan bli konsekvensene av eventuelle brudd på vilkårene." Source: R-35 Para 20 — beginning Requirement: "Hvis konsekvensen av vilkårsbrudd skal iverksettes må det fattes et nytt vedtak." Source: R-35 Para 20 — beginning Requirement: "Hvis vilkåret endres, skal det fattes nytt vedtak." Source: R-35 Para 20 — beginning Requirement: "Nav-kontoret skal derfor fatte et skriftlig, begrunnet vedtak som uttrykkelig viser at det er satt vilkår, hva vilkåret går ut på og konsekvensen hvis vilkåret brytes." Source: R-35 Para 20 — middle Requirement: "Vedtaket må også opplyse om adgangen til å klage på vilkåret." Source: R-35 Para 20 — middle Requirement: "Konsekvensen ved brudd på vilkår skal klart fremkomme av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — end Requirement: "Det kan ikke settes vilkår etter sotjl. §§ 20 eller 20 a i vedtak om opplysning, råd og veiledning etter sotjl. § 17." Source: Veileder sotjl § 17 Requirement: "Hvis brukeren imidlertid ønsker opplysning, råd og veiledning, kan vedkommende ha nytte av at det stilles vilkår om å søke om tjenesten, eller møte til samtaler, i vedtak om økonomisk stønad." Source: Veileder sotjl § 17 Requirement: "Det skal ikke settes vilkår for tildeling av økonomisk stønad i en nødssituasjon." Source: R-35 Para 20 — beginning Requirement: "Avgjørelse om å sette vilkår skal fremgå av vedtaket om tildeling av økonomisk stønad." Source: R-35 Para 20 — beginning Requirement: "Vilkår skal begrunnes og det må tydelig fremkomme av vedtaket hva plikten innebærer..." Source: R-35 Para 20 — beginning Requirement: "Hvis konsekvensen av vilkårsbrudd skal iverksettes må det fattes et nytt vedtak." Source: R-35 Para 20 — beginning Requirement: "Hvis vilkåret endres, skal det fattes nytt vedtak." Source: R-35 Para 20 — beginning Requirement: "Før det settes vilkår, skal Nav-kontoret alltid foreta en konkret individuell vurdering av om vilkår er hensiktsmessig..." Source: R-35 Para 20 — middle Requirement: "For alle typer vilkår skal Nav-kontoret foreta en konkret individuell vurdering av hvor tyngende vilkåret er for den enkelte tjenestemottaker..." Source: R-35 Para 20 — middle Requirement: "Det må foretas en konkret individuell vurdering av hvilke arbeidsoppgaver som passer for den enkelte." Source: R-35 Para 20 — middle Requirement: "Nav-kontoret må derfor sørge for at tjenestemottakeren har fått mulighet til å uttale seg før vedtaket om konsekvensen av vilkårsbruddet fattes." Source: R-35 Para 20 — end Requirement: "Ved brudd på vilkår skal det gjøres en konkret og individuell vurdering av om det skal fattes vedtak om at konsekvensen skal gjennomføres." Source: R-35 Para 20 — end Requirement: "Nav-kontoret skal alltid sikre at barns behov blir ivaretatt, og det må derfor foretas en konkret og individuell vurdering av hvilken betydning konsekvensene av vilkårsbruddet får for barna." Source: R-35 Para 20 — end Requirement: "Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet." Source: Kommunebrev 2025 Requirement: "Ved tildeling av økonomisk sosialhjelp til personer under 30 år, skal det stilles vilkår om aktivitet med mindre tungtveiende grunner taler mot det." Source: Kommunebrev 2025 Requirement: "Vilkår om salg av eiendeler kan uansett ikke stilles som en forutsetning for å få sitt hjelpebehov vurdert, og skal som hovedregel settes i samarbeid med den som søker..." Source: Veileder øk. stønad Requirement: "Det kan ikke settes vilkår etter sotjl. §§ 20 eller 20 a i vedtak om opplysning, råd og veiledning etter sotjl. § 17." Source: Veileder sotjl § 17 Requirement: "Avgjørelse om å stille vilkår skal fremgå av vedtaket om tildeling av økonomisk stønad." Source: R-35, punkt 4.20a — beginning Requirement: "Hvis vilkåret endres, skal det fattes nytt vedtak." Source: R-35, punkt 4.20a — beginning Requirement: "Vilkår skal begrunnes..." Source: R-35, punkt 4.20a — beginning Requirement: "...og det må tydelig fremkomme av vedtaket hva plikten innebærer..." Source: R-35, punkt 4.20a —

beginning Requirement: "...hva som kreves for at plikten skal anses oppfylt..." Source: R-35, punkt 4.20a — beginning Requirement: "...og hva som kan bli konsekvensene av eventuelle brudd på vilkårene." Source: R-35, punkt 4.20a — beginning Requirement: "Hvis konsekvensen av vilkårsbrudd skal iverksettes må det fattes et nytt vedtak." Source: R-35, punkt 4.20a — beginning Requirement: "Nav-kontoret skal derfor fatte et skriftlig, begrunnet vedtak..." Source: R-35, punkt 4.20a — middle Requirement: "...som uttrykkelig viser at det er satt vilkår..." Source: R-35, punkt 4.20a — middle Requirement: "...hva vilkåret innebærer..." Source: R-35, punkt 4.20a — middle Requirement: "...hva som kreves for at vilkåret anses oppfylt..." Source: R-35, punkt 4.20a — middle Requirement: "...hva som kan bli konsekvensene hvis vilkåret brytes..." Source: R-35, punkt 4.20a — middle Requirement: "...og adgangen til å klage på vedtaket." Source: R-35, punkt 4.20a — middle Requirement: "Konsekvensen ved brudd på vilkår skal klart fremkomme av vedtaket om tildeling av økonomisk stønad." Source: R-35, punkt 4.20a — end Requirement: "Ved brudd på vilkår skal det gjøres en konkret og individuell vurdering av om det skal fattes vedtak om at konsekvensen skal gjennomføres." Source: R-35, punkt 4.20a — end Requirement: "Det kan ikke settes vilkår etter sotjl. §§ 20 eller 20 a i vedtak om opplysning, råd og veiledning etter sotjl. § 17." Source: Veileder til sosialtjenesteloven § 17 Requirement: "Det skal stilles vilkår om aktivitet for tildeling av økonomisk stønad til personer under 30 år." Source: R-35, punkt 4.20a — beginning Requirement: "Dersom manglende norsk- eller samiskkunnskaper er årsaken til at personen ikke er selvhjulpen, skal det vurderes å stille vilkår om norsk- eller samiskopplæring." Source: R-35, punkt 4.20a — beginning Requirement: "Nav-kontoret må foreta en konkret og individuell vurdering av hvilke aktiviteter som er hensiktsmessig for den enkelte." Source: R-35, punkt 4.20a — middle Requirement: "Tjenestemottakers behov, synspunkter og ønsker skal tas med i vurderingene." Source: R-35, punkt 4.20a — middle Requirement: "Tjenestemottakere som fyller kravene for deltakelse i kvalifiseringsprogram skal få tilbud om dette før det vil være aktuelt å tildele økonomisk stønad med vilkår om aktivitet." Source: R-35, punkt 4.20a — middle Requirement: "Nav-kontoret må foreta en konkret og individuell vurdering av om det foreligger tungtveiende grunner for ikke å delta i aktivitet." Source: R-35, punkt 4.20a — middle Requirement: "Hvis tjenestemottaker har tungtveiende grunner på vedtakstidspunktet må Nav-kontoret følge opp vedkommende med tiltak og støtte, og stille vilkår om aktivitet når det ikke lenger foreligger tungtveiende grunner." Source: R-35, punkt 4.20a — middle Requirement: "For alle typer vilkår skal Nav-kontoret foreta en konkret og individuell vurdering av hvor tyngende vilkåret er for den enkelte tjenestemottaker, og eventuelt vedkommendes familie." Source: R-35, punkt 4.20a — middle Requirement: "Nav-kontoret må derfor sørge for at tjenestemottaker har fått mulighet til å uttale seg før vedtaket om konsekvensen av vilkårsbruddet fattes." Source: R-35, punkt 4.20a — end Requirement: "Nav-kontoret skal alltid sikre at barns behov blir ivaretatt, og det må derfor foretas en konkret og individuell vurdering av hvilken betydning konsekvensene av vilkårsbruddet får for barna." Source: R-35, punkt 4.20a — end Requirement: "Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet." Source: Kommunebrev 2025 Requirement: "Nav-kontoret og kommunen bør tilstrebe å bygge opp brede og fleksible aktivitetstilbud for de unge." Source: Kommunebrev 2025

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates the procedural precondition of notifying the user in the decision document. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates how the decision to set conditions must be formally recorded in the grant decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement imposes an administrative duty to provide written justifications for decisions. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement specifies exactly what explanatory content the decision document must contain. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement specifies that the decision must document information regarding breach consequences. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates the administrative step of producing a new, separate decision to enforce a breach. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that the administrative process of modifying a condition requires a new formal decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates the exact form (written, reasoned) and explicit content items required in the decision document. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement imposes a process duty to notify the user of their appeal rights in the decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement sets a qualitative standard for how clearly information must be presented in the decision document. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement restricts the legal scope and context where the authority to impose conditions can be exercised. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement addresses the substantive legal option to utilize a counseling requirement as a condition. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement eliminates the legal option to set conditions entirely in emergency situations. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates how the condition-decision is presented and recorded. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates the duty to reason and clearly communicate the condition's content in the decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement demands a distinct procedural vehicle (new decision) to implement a substantive breach response. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that modifying a condition must be done through a new administrative decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates a mandatory individual assessment process prior to exercising discretion. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates a procedural step to individually assess the burden of a condition to operationalize proportionality. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates a procedural step to individually assess what tasks are appropriate for a user. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates an administrative duty to secure user communication and input before a decision is finalized. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates a procedural assessment process before determining whether to reduce a benefit. Requirement: [PROCEDURAL/DOCUMENTATION] - Ambiguous — recommend human legal review (combines a procedural individual assessment requirement with a substantive duty to secure children's needs). Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement imposes a mandatory sequential administrative step to assess another program before applying conditions. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement

mirrors a mandatory legal duty to impose an activity condition on a specific group alongside a substantive threshold for exemption. Requirement: [PROCEDURAL/DOCUMENTATION] - Ambiguous — recommend human legal review (combines a substantive prohibition regarding asset sales with a procedural mandate for user collaboration). Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement restricts the substantive legal scope of the conditional power. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement governs the form of the written decision where the condition must be documented. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates the administrative step of producing a new decision when amending conditions. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates an administrative reasoning requirement for decision documents. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement specifies the explanatory content required in the decision document. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that specific fulfillment criteria must be explicitly documented. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that information on breach consequences must be included in the document. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates a new formal decision if breach consequences are executed. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates the production of a written and reasoned decision. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement demands explicit documentation that conditions are set. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that the decision explicitly document what the condition implies. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement demands explicit documentation regarding fulfillment criteria. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement demands explicit documentation regarding breach consequences. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement mandates a procedural rights-notification to inform the user of appeal options. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement sets a qualitative standard for how breach consequences must be displayed in the document. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates an individual assessment process before executing a breach consequence. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement defines the outer substantive boundary of where the law's application can occur. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement states the core mandatory substantive duty to impose conditions for a demographic. Requirement: [PROCEDURAL/DOCUMENTATION] - Ambiguous — recommend human legal review (combines an evidence assessment procedure with a substantive language training duty condition). Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates an administrative process to assess which specific activities are appropriate. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates that user views must be procedurally gathered and weighed in assessments. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement creates a mandatory procedural sequence regarding offers given to users prior to imposing conditions. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates a procedural assessment to determine if factual grounds for an exemption exist. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement mandates a substantive ongoing duty to provide follow-up measures and re-impose conditions. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates a mandatory procedural step to assess the individual burden to

operationalize proportionality. Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement dictates a communication procedure to ensure users can comment before a decision. Requirement: [PROCEDURAL/DOCUMENTATION] - Ambiguous — recommend human legal review (combines an absolute procedural assessment requirement with the substantive safeguarding of children). Requirement: [PROCEDURAL/DOCUMENTATION] - The requirement imposes a prerequisite sequential step to assess qualification program rights. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] - The requirement addresses the municipality's systemic duty regarding service capacity.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: DOC-REQ-20.1 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: The grant decision must inform the user about the possibility of benefit reduction upon breach. Legal Gap: No gap identified. The statutory precondition in § 20 directly requires informing about the consequences of breach. Thematic Category: [USER-COMM]

Requirement Reference: 2 Finding Reference: DOC-REQ-20.2 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: The decision to set conditions must explicitly appear in the grant decision itself. Legal Gap: § 20 contains no explicit requirement that the decision to set conditions must appear in the grant decision as opposed to a separate decision. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: DOC-REQ-20.3 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: Conditions must be accompanied by a written justification. Legal Gap: No gap identified. General administrative law (fvl. §§ 24-25) and preparatory works explicitly require reasoned decisions. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: DOC-REQ-20.4 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: The decision must clearly document what the obligation entails and what is required to consider it fulfilled. Legal Gap: § 20 contains no specification of what detailed content the decision must include beyond the conditions themselves. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: DOC-REQ-20.5 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: The decision must document the potential consequences of breaching conditions. Legal Gap: No gap identified. The statutory precondition directly requires informing about the possibility of reduction. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: DOC-REQ-20.6 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: If the breach consequence is to be implemented, a new administrative decision must be made. Legal Gap: No gap identified. Preparatory works state explicitly that if support is to be reduced, a separate decision must be made. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: DOC-REQ-20.7 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: A new administrative decision must be produced if conditions are changed. Legal Gap: § 20 contains no provision addressing what must happen procedurally when conditions are changed. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: DOC-REQ-20.8 Circular/Source: R-35 Para 20 — middle Nature of Procedural Requirement: Caseworkers must produce a written, reasoned decision expressly detailing that conditions are set, their content, and breach consequences. Legal Gap: § 20 provides no explicit specification of detailed decision form or content requiring all elements to be expressly shown. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: DOC-REQ-20.9 Circular/Source: R-35 Para 20 — middle Nature of Procedural Requirement: The decision must inform the user about their right to appeal the condition. Legal Gap: No gap identified. Fvl. § 27 creates a mandatory obligation to inform regarding appeal rights independent of § 20. Thematic Category: [USER-COMM]

Requirement Reference: 10 Finding Reference: DOC-REQ-20.10 Circular/Source: R-35 Para 20 — end Nature of Procedural Requirement: Breach consequences must be clearly presented in the decision document. Legal Gap: No gap identified. This accurately implements the statutory precondition of informing the user, adding a clear qualitative standard. Thematic Category: [DOC-REQ]

Requirement Reference: 14 Finding Reference: PROC-REQ-20.2 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: The decision to set conditions must explicitly appear in the grant decision itself. Legal Gap: § 20 contains no explicit requirement that the condition must appear specifically in the grant decision. Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: PROC-REQ-20.3 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: Conditions must be justified and clearly state what the obligation implies. Legal Gap: No gap identified. It is grounded in prep works and general administrative law (fvl. §§ 24-25). Thematic Category: [DOC-REQ]

Requirement Reference: 16 Finding Reference: PROC-REQ-20.4 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: A new administrative decision must be produced to execute breach consequences. Legal Gap: No gap identified. Preparatory works state explicitly that a separate decision must be formulated. Thematic Category: [DOC-REQ]

Requirement Reference: 17 Finding Reference: PROC-REQ-20.5 Circular/Source: R-35 Para 20 — beginning Nature of Procedural Requirement: A new administrative decision must be produced if conditions are modified. Legal Gap: § 20 contains no explicit provision addressing the procedural requirement when conditions are changed. Thematic Category: [DOC-REQ]

Requirement Reference: 18 Finding Reference: PROC-REQ-20.6 Circular/Source: R-35 Para 20 — middle Nature of Procedural Requirement: A concrete individual assessment must always be conducted to determine if conditions are appropriate prior to setting them.

Legal Gap: § 20 contains no explicit text establishing a mandatory pre-condition to conduct an individual assessment before exercising the 'kan' (may) discretion. Thematic Category: [ASSESS-PROC]

Requirement Reference: 19 Finding Reference: PROC-REQ-20.7 Circular/Source: R-35 Para 20 — middle Nature of Procedural Requirement: Caseworkers must conduct a concrete individual assessment to evaluate how burdensome a condition is for the user. Legal Gap: No gap identified. It is the direct procedural implementation of the statutory proportionality mandate ("ikke uforholdsmessig byrdefulle"). Thematic Category: [ASSESS-PROC]

Requirement Reference: 20 Finding Reference: PROC-REQ-20.8 Circular/Source: R-35 Para 20 — middle Nature of Procedural Requirement: Caseworkers must individually evaluate and assess which specific tasks are appropriate for the user. Legal Gap: No gap identified. It is the mandatory-closed procedural implementation of assessing the open normative term "passende" (appropriate). Thematic Category: [ASSESS-PROC]

Requirement Reference: 21 Finding Reference: PROC-REQ-20.9 Circular/Source: R-35 Para 20 — end Nature of Procedural Requirement: The authority must ensure the user has the opportunity to comment prior to concluding a breach consequence decision. Legal Gap: No gap identified. Fvl. § 17 creates a mandatory procedural obligation to hear parties before adverse decisions. Thematic Category: [USER-COMM]

Requirement Reference: 22 Finding Reference: PROC-REQ-20.10 Circular/Source: R-35 Para 20 — end Nature of Procedural Requirement: Caseworkers must perform a concrete and individual assessment of whether a breach reduction decision should be made. Legal Gap: No gap identified. Preparatory works establish a direct normative basis for a concrete assessment before implementing breach consequences. Thematic Category: [ASSESS-PROC]

Requirement Reference: 23 Finding Reference: PROC-REQ-20.11 Circular/Source: R-35 Para 20 — end Nature of Procedural Requirement: A concrete individual assessment of how a reduction impacts the user's children must always be conducted. Legal Gap: No gap identified. Prop. 13 L directs that special consideration be taken for children's needs, creating the basis for this procedure. Thematic Category: [ASSESS-PROC]

Requirement Reference: 24 Finding Reference: PROC-REQ-20.12 Circular/Source: Kommunebrev 2025 Nature of Procedural Requirement: Caseworkers must assess the right to the Qualification Program (KVP) prior to stipulating activity conditions. Legal Gap: § 20 contains no sequencing requirement indicating KVP eligibility assessment must occur before invoking the § 20 condition-setting regime. Thematic Category: [SEQUENCE]

Requirement Reference: 26 Finding Reference: PROC-REQ-20.14 Circular/Source: Veileder øk. stønad Nature of Procedural Requirement: Caseworkers must, as a main rule, formulate conditions in active collaboration with the applicant. Legal Gap: § 20 leaves entirely open how conditions are formulated and contains no procedural specification dictating collaboration as the mandatory default. Thematic Category: [USER-COMM]

Requirement Reference: 28 Finding Reference: DOC-REQ-20a.1 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: The decision to set conditions must explicitly appear in the grant decision document. Legal Gap: No gap identified. It specifies standard procedure under general administrative law governing the format of decision recording. Thematic Category: [DOC-REQ]

Requirement Reference: 29 Finding Reference: DOC-REQ-20a.2 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: Modifications to conditions require generating a new administrative decision. Legal Gap: No gap identified. It rests on the standard principle of administrative law concerning the amendment of binding decisions under fvl. § 35. Thematic Category: [DOC-REQ]

Requirement Reference: 30 Finding Reference: DOC-REQ-20a.3 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: Conditions must be formally justified in the documentation. Legal Gap: No gap identified. The duty to reason administrative decisions is grounded firmly in general admin law (fvl. § 24). Thematic Category: [DOC-REQ]

Requirement Reference: 31 Finding Reference: DOC-REQ-20a.4 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: The decision document must clarify explicitly what the activity duty entails. Legal Gap: No gap identified. It is directly grounded in Prop. 13 L and fvl. § 25 dictating specific procedural documentation. Thematic Category: [DOC-REQ]

Requirement Reference: 32 Finding Reference: DOC-REQ-20a.5 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: The written decision must establish criteria regarding what is required for the obligation to be considered fulfilled. Legal Gap: No gap identified. It has direct grounding in preparatory works (Prop. 13 L) and general administrative law. Thematic Category: [DOC-REQ]

Requirement Reference: 33 Finding Reference: DOC-REQ-20a.6 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: The decision documentation must clarify the potential consequences of condition breaches. Legal Gap: No gap identified. Section 20a (S7) explicitly mandates prior information on potential reductions as a prerequisite. Thematic Category: [DOC-REQ]

Requirement Reference: 34 Finding Reference: DOC-REQ-20a.7 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: A new formal decision must be made to implement a breach consequence. Legal Gap: No gap identified. Flowing from the statutory text "fattes vedtak" and general administrative principles regarding adverse decisions. Thematic Category: [DOC-REQ]

Requirement Reference: 35 Finding Reference: DOC-REQ-20a.8 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must produce a written, reasoned administrative decision. Legal Gap: No gap identified. Applies the general mandate of fvl. §§ 23-25 to § 20a conditions. Thematic Category: [DOC-REQ]

Requirement Reference: 36 Finding Reference: DOC-REQ-20a.9 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: The document must expressly

indicate that conditions have been imposed. Legal Gap: No gap identified. Directly based on general documentation requirements (fvl. § 25) and preparatory works. Thematic Category: [DOC-REQ]

Requirement Reference: 37 Finding Reference: DOC-REQ-20a.10 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: The written document must define what the condition itself involves. Legal Gap: No gap identified. Derives explicitly from preparatory works directing caseworkers to define the duty clearly. Thematic Category: [DOC-REQ]

Requirement Reference: 38 Finding Reference: DOC-REQ-20a.11 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: The documentation must record the criteria for fulfilling the condition. Legal Gap: No gap identified. Substantively mirrors documentation duties derived from Prop. 13 L and fvl. § 25. Thematic Category: [DOC-REQ]

Requirement Reference: 39 Finding Reference: DOC-REQ-20a.12 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: The documentation must notify the user of potential breach outcomes. Legal Gap: No gap identified. Extracts the explicit statutory prerequisite under S7 that users be notified. Thematic Category: [DOC-REQ]

Requirement Reference: 40 Finding Reference: DOC-REQ-20a.13 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: The decision must inform users regarding their administrative appeal rights. Legal Gap: No gap identified. Operates as an administrative duty from fvl. § 27 to communicate rights to parties. Thematic Category: [USER-COMM]

Requirement Reference: 41 Finding Reference: DOC-REQ-20a.14 Circular/Source: R-35, punkt 4.20a — end Nature of Procedural Requirement: The grant decision must clearly disclose the specific consequence of condition breach. Legal Gap: No gap identified. The qualitative standard directly restates the statutory notification prerequisite under S7. Thematic Category: [DOC-REQ]

Requirement Reference: 42 Finding Reference: DOC-REQ-20a.15 / PROC-REQ-20a.9 Circular/Source: R-35, punkt 4.20a — end Nature of Procedural Requirement: Caseworkers must perform an individual and concrete assessment prior to deciding to execute breach consequences. Legal Gap: No gap identified. Relies directly on fvl. § 17 assessment duties combined with S6 proportionality constraints. Thematic Category: [ASSESS-PROC]

Requirement Reference: 45 Finding Reference: PROC-REQ-20a.2 Circular/Source: R-35, punkt 4.20a — beginning Nature of Procedural Requirement: Caseworkers must undertake a procedure evaluating whether lacking language skills caused the dependency. Legal Gap: No gap identified. The circular precisely quotes S3 of the statute establishing the assessment duty. Thematic Category: [ASSESS-PROC]

Requirement Reference: 46 Finding Reference: PROC-REQ-20a.3 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must conduct a concrete individual evaluation to determine suitable activity content for the user. Legal Gap: No gap identified. Replicates preparatory works and fvl. § 17 duties to thoroughly investigate and apply proportionality constraints. Thematic Category: [ASSESS-PROC]

Requirement Reference: 47 Finding Reference: PROC-REQ-20a.4 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must ensure the user's views and preferences are gathered and considered within the assessment process. Legal Gap: No gap identified. Based explicitly on general administrative investigation duties (fvl. § 17) and user participation requirements (sotjl. § 42). Thematic Category: [ASSESS-PROC]

Requirement Reference: 48 Finding Reference: PROC-REQ-20a.5 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must offer the Qualification Program (KVP) to qualifying users prior to imposing § 20a activity conditions. Legal Gap: § 20a contains no sequence mechanism mandating that the offer of KVP must precede the application of activity conditions. Thematic Category: [SEQUENCE]

Requirement Reference: 49 Finding Reference: PROC-REQ-20a.6 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must undertake a concrete individual assessment to determine if "weighty reasons" exist for an exemption. Legal Gap: No gap identified. It is the procedural mechanism needed to determine if the statutory open normative standard (S2) is triggered. Thematic Category: [ASSESS-PROC]

Requirement Reference: 51 Finding Reference: PROC-REQ-20a.8 Circular/Source: R-35, punkt 4.20a — middle Nature of Procedural Requirement: Caseworkers must individually assess how burdensome a condition will be on the recipient and their family. Legal Gap: No gap identified. Directly operationalizes the mandatory assessment needed to evaluate S6's legal standard regarding disproportionate burdens. Thematic Category: [ASSESS-PROC]

Requirement Reference: 52 Finding Reference: PROC-REQ-20a.10 Circular/Source: R-35, punkt 4.20a — end Nature of Procedural Requirement: Caseworkers must ensure that users are provided the opportunity to comment before adverse breach decisions are formalized. Legal Gap: No gap identified. Applies the fundamental procedural guarantee under Norwegian administrative law (fvl. § 16 advance notice) prior to adverse decisions. Thematic Category: [USER-COMM]

Requirement Reference: 53 Finding Reference: PROC-REQ-20a.11 Circular/Source: R-35, punkt 4.20a — end Nature of Procedural Requirement: Caseworkers must continuously mandate a concrete individual assessment on how a consequence directly affects the recipient's children. Legal Gap: Prop. 13 L authorizes special consideration but does not strictly mandate a separate, mandatory "always" assessment regarding child impacts devoid of flexibility. Thematic Category: [ASSESS-PROC]

Requirement Reference: 54 Finding Reference: PROC-REQ-20a.12 Circular/Source: Kommunebrev 2025 Nature of Procedural Requirement: A procedure assessing KVP rights must be executed before activity conditions are set. Legal Gap: § 20a S1 mandates activity conditions but contains no prerequisite sequencing assessment for KVP rights. Thematic Category: [SEQUENCE]

Step 1 — Extract All Requirements for Process inflation(§ 21)

Requirement 1: Er stønaden gitt som lån eller garanti for lån, skal vedtaket inneholde bestemmelser om lånevilkårene. Source: R-35 Para 21 / DOC-REQ-21.1 (4.21, introductory)

Requirement 2: Avgjørelse om stønadsform, og eventuell endring av stønadsform, fattes og begrunnes i enkeltvedtak. Source: R-35 Para 21 / DOC-REQ-21.2 (4.21.1.1)

Requirement 3: For å dokumentere at tjenestemottaker har gitt tillatelse til at bidraget kan utbetales til andre, og sikre at taushetspliktreglene overholdes, bør samtykket være skriftlig. Source: R-35 Para 21 / DOC-REQ-21.3 (4.21.2.1)

Requirement 4: Hvis tjenestemottaker ønsker at bidraget skal utbetales til andre... må vedkommende gi Nav-kontoret samtykke til dette. Source: R-35 Para 21 / PROC-REQ-21.1 (4.21.2.1)

Requirement 5: Vedtak om økonomisk stønad som lån skal inneholde de nærmere vilkårene for lånet, som rentesats og forfallsdato for avdrag. Source: R-35 Para 21 / DOC-REQ-21.4 + PROC-REQ-21.3 (4.21.2.2)

Requirement 6: Tjenestemottaker bør undertegne et gjeldsbrev ved innvilgelse av økonomisk stønad som lån. Source: R-35 Para 21 / DOC-REQ-21.5 (4.21.2.2)

Requirement 7: Hvis lånet er gitt til flere, som ektefeller eller samboere, må begge undertegne søknaden, og eventuelt gjeldsbrevet, for at de skal bli solidarisk ansvarlig for lånet. Source: R-35 Para 21 / DOC-REQ-21.6 (4.21.2.2)

Requirement 8: Vedtak om økonomisk stønad som garanti for lån skal inneholde de nærmere vilkårene for garantien, som konsekvensene hvis garantien innfris. Source: R-35 Para 21 / DOC-REQ-21.7 + PROC-REQ-21.6 (4.21.2.3)

Requirement 9: Vedtak om økonomisk stønad i form av lån til depositum eller som garanti overfor utleier skal inneholde de nærmere vilkårene for lånet eller garantien, som rentesats, forfallsdato for avdrag og konsekvensene hvis garantien innfris. Source: R-35 Para 21 / DOC-REQ-21.8 (4.21.2.4)

Requirement 10: Nav-kontoret skal vurdere om det foreligger tilstrekkelige holdepunkter for at tjenestemottaker faktisk kan tilbakebetale lånet, før stønad gis som lån. Source: R-35 Para 21 / PROC-REQ-21.2 (4.21.2.2)

Requirement 11: Tjenestemottakers økonomiske situasjon kan ha endret seg når lånet skal tilbakebetales, og Nav-kontoret må vurdere om lånet helt eller delvis skal omgjøres til bidrag. Source: R-35 Para 21 / PROC-REQ-21.4 (4.21.2.2)

Requirement 12: Nav-kontoret skal vurdere om det foreligger tilstrekkelige holdepunkter for at tjenestemottaker faktisk kan tilbakebetale lånet, før det stilles garanti. Source: R-35 Para 21 / PROC-REQ-21.5 (4.21.2.3)

Requirement 13: Tjenestemottakers økonomiske situasjon kan ha endret seg når garantien eventuelt innfris, og Nav-kontoret må vurdere om garantien helt eller delvis skal omgjøres til bidrag. Source: R-35 Para 21 / PROC-REQ-21.7 (4.21.2.3)

Requirement 14: Økonomisk stønad i form av lån til depositum eller som garanti for depositumet overfor utleier, må vurderes hvis tjenestemottaker ikke har egne midler til dette. Source: R-35 Para 21 / PROC-REQ-21.8 (4.21.2.4)

Requirement 15: Hvis utleier fremmer krav i depositumet, bør Nav-kontoret søke å sikre enighet mellom tjenestemottaker og utleier før depositumsgarantien innfris. Source: R-35 Para 21 / PROC-REQ-21.9 (4.21.2.4)

Requirement 16: Nav-kontoret bør innhente samtykke fra tjenestemottaker før garantien innfris. Source: R-35 Para 21 / PROC-REQ-21.10 (4.21.2.4)

Requirement 17: Unntaksvis kan økonomisk stønad gis i form av varer og tjenester. Nav-kontoret må foreta en konkret vurdering av om betingelsene for det er oppfylt. Source: R-35 Para 21 / PROC-REQ-21.11 (4.21.2.5)

Requirement 18: Nav-kontoret må ha konkrete holdepunkter for å anta at tjenestemottaker ikke vil bruke stønaden i henhold til vilkårene som er satt. Source: R-35 Para 21 / PROC-REQ-21.12 (4.21.2.5)

Requirement 19: vurder om det er nødvendig med en husleiegaranti eller depositum. Det kan være viktig å avklare dette tidlig i prosessen. Source: Veiviser for midlertidig botilbud (supplementary document)

Step 2 — Classify Each Requirement

Requirement 1 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the mandatory administrative form and content that must be documented in a loan decision.

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the procedural form (enkeltvedtak) and mandatory documentation of reasoning for the decision on the form of benefit.

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It prescribes the administrative process of documenting recipient consent in writing.

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It dictates a mandatory administrative step of obtaining user consent before routing payments to third parties.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It outlines the specific variables and terms that must be recorded in the formal decision document.

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It specifies the administrative process of having a recipient sign a specific record (promissory note).

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) Justification: It outlines the procedural step of obtaining signatures on administrative forms, though this step creates substantive civil law consequences (solidary liability).

Requirement 8 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It mandates the inclusion of specific pieces of information to be documented in a guarantee decision.

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It dictates exact details and terms that must be recorded in decisions concerning deposit loans or guarantees.

Requirement 10 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It converts a permissive power into a binding duty and establishes a strict evidentiary threshold ("tilstrekkelige holdepunkter") that the legal decision must meet.

Requirement 11 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It prescribes a mandatory administrative reassessment procedure at a later point in the case lifecycle.

Requirement 12 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It imposes a mandatory evidentiary standard and legal threshold that must be satisfied before providing a guarantee.

Requirement 13 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It mandates an administrative reassessment procedure at the post-event phase of guarantee redemption.

Requirement 14 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It converts an advisory recommendation into an automatic legal duty upon a defined factual trigger ("hvis tjenestemottaker ikke har egne midler").

Requirement 15 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It establishes a procedural dispute mediation step to be attempted before redeeming a deposit guarantee.

Requirement 16 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It introduces an administrative procedure to obtain user consent prior to paying out on a guarantee.

Requirement 17 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It requires a concrete evaluation process as an administrative precondition before the caseworker can utilize a discretionary legal power.

Requirement 18 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It restricts the legal standard by stipulating a specific evidentiary requirement ("konkrete holdepunkter") necessary to restrict benefits.

Requirement 19 Classification: [PROCEDURAL/DOCUMENTATION] Justification: It acts as an early-stage sequential administrative directive outlining what caseworkers should investigate.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 of 18 / DOC-REQ-21.1 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.1 (4.21, introductory) **Nature of Procedural Requirement:** The decision document must include the specified terms of the loan. **Legal Gap:** N/A — circular reproduces the statutory text verbatim; no gap exists. **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 of 18 / DOC-REQ-21.2 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.2 (4.21.1.1) **Nature of Procedural Requirement:** Must issue and document decisions regarding the form of benefit as reasoned individual decisions (enkeltvedtak). **Legal Gap:** Authority is found in general administrative law (fvl. §§ 2(b), 24), as § 21 is silent on the specific decision form. **Thematic Category:** [DOC-REQ]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 of 18 / DOC-REQ-21.3 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.3 (4.21.2.1) **Nature of Procedural Requirement:** Should document consent in writing to pay grants to third parties. **Legal Gap:** § 21 is entirely silent on payment routing to third parties or written consent for the same (authority may exist in taushetsplikt rules instead). **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 18 / PROC-REQ-21.1 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.1 (4.21.2.1) **Nature of Procedural Requirement:** Must obtain consent from the recipient to route grant payments to third parties. **Legal Gap:** § 21 does not address consent requirements for third-party payment routing. **Thematic Category:** [USER-COMM]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 18 / DOC-REQ-21.4 + PROC-REQ-21.3 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.4 + PROC-REQ-21.3 (4.21.2.2) **Nature of Procedural Requirement:** Decision documents must specify definitive loan terms such as interest rate and due dates. **Legal Gap:** N/A — lawful operationalization of the open statutory term within a mandatory-closed duty. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 18 / DOC-REQ-21.5 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.5 (4.21.2.2) **Nature of Procedural Requirement:** Should have the recipient sign a promissory note (gjeldsbrev) for a loan. **Legal Gap:** § 21 mandates loan terms inside the decision, but is completely silent on requiring supplementary civil debt instruments like promissory notes. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 of 18 / DOC-REQ-21.6 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.6 (4.21.2.2) **Nature of Procedural Requirement:** Must have both parties sign the application and promissory note to establish

solidary liability. **Legal Gap:** § 21 contains no provision governing joint borrowers, co-signatures, or solidary liability; the requirement operates entirely outside § 21's statutory scope. **Thematic Category:** [DOC-REQ]

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 of 18 / DOC-REQ-21.7 + PROC-REQ-21.6 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.7 + PROC-REQ-21.6 (4.21.2.3) **Nature of Procedural Requirement:** Guarantee decisions must state detailed terms, including the consequences if the guarantee is redeemed. **Legal Gap:** N/A — lawful operationalization fully within the mandatory-closed statutory requirement to include guarantee terms. **Thematic Category:** [DOC-REQ]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 of 18 / DOC-REQ-21.8 **Circular/Source:** R-35 Para 21 / DOC-REQ-21.8 (4.21.2.4) **Nature of Procedural Requirement:** Deposit loan or guarantee decisions must document specific terms like interest rate, due date, and redemption consequences. **Legal Gap:** N/A — fully authorized operationalization of the mandatory-closed statutory duty. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 of 18 / PROC-REQ-21.4 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.4 (4.21.2.2) **Nature of Procedural Requirement:** Must reassess whether a loan should be converted to a grant at the precise time of repayment. **Legal Gap:** § 21 contains no provision on reassessment of loans at the point of repayment or conversion of loans to grants. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 of 18 / PROC-REQ-21.7 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.7 (4.21.2.3) **Nature of Procedural Requirement:** Must evaluate whether a guarantee should be converted to a grant at the point of redemption. **Legal Gap:** § 21 contains no textual basis for a mandatory reassessment obligation at the time of guarantee redemption. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 15 **Finding Reference:** REQUIREMENT 15 of 18 / PROC-REQ-21.9 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.9 (4.21.2.4) **Nature of Procedural Requirement:** Should attempt to mediate an agreement between the recipient and the landlord if a claim is made on a deposit guarantee. **Legal Gap:** § 21 is confined to decision content at the time of grant and contains no provision governing the post-grant process of handling a landlord's claim. **Thematic Category:** [OTHER] Dispute mediation and negotiation procedure with third parties.

Requirement Reference: 16 **Finding Reference:** REQUIREMENT 16 of 18 / PROC-REQ-21.10 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.10 (4.21.2.4) **Nature of Procedural Requirement:** Should obtain the recipient's consent before a guarantee is redeemed. **Legal Gap:** § 21 contains no provision or language regarding consent procedures prior to guarantee redemption. **Thematic Category:** [USER-COMM]

Requirement Reference: 17 **Finding Reference:** REQUIREMENT 17 of 18 / PROC-REQ-21.11 **Circular/Source:** R-35 Para 21 / PROC-REQ-21.11 (4.21.2.5) **Nature of Procedural Requirement:** Must conduct a concrete evaluation to verify statutory conditions are met before granting benefits as goods or services. **Legal Gap:** N/A — deemed a lawful

procedural precondition for exercising the discretionary power explicitly established in § 21 Sentence B. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 19 **Finding Reference:** ORPHAN REQUIREMENTS / PROC-REQ-21.13 **Circular/Source:** Veiviser for midlertidig botilbud (supplementary document) **Nature of Procedural Requirement:** Consider if a rent guarantee or deposit is necessary early in the process. **Legal Gap:** It carries no legal citation, originates purely from a supplementary document, and operates as a caseworker directive completely lacking a statutory anchor. **Thematic Category:** [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 22)

Requirement 1: Når det ikke er truffet vedtak som nevnt i § 21 fjerde ledd, skal stønaden utbetales til den som har søkt om stønad. **Source:** R-35 Para 22 / PROC-REQ-22.1.

Requirement 2: Dersom stønaden skal komme flere til gode, kan det bestemmes at den skal deles mellom dem. **Source:** R-35 Para 22 / PROC-REQ-22.2.

Requirement 3: Økonomisk stønad kan utbetales til andre hvis tjenestemottaker har gitt samtykke til dette.... **Source:** R-35 Para 22 / PROC-REQ-22.3.

Requirement 4: Nav-kontoret bestemmer selv hvorvidt økonomisk stønad utbetales kontant, overføres til bankkonto, postanvisning eller lignende. **Source:** R-35 Para 22 / PROC-REQ-22.4.

Requirement 5: Nav-kontoret skal imidlertid rådføre seg med tjenestemottaker, og utbetalingsmåten skal være minst mulig belastende for tjenestemottaker. **Source:** R-35 Para 22 / PROC-REQ-22.5.

Requirement 6: Avgjørelsen om utbetalingsmåte og om stønaden skal utbetales til andre etter samtykke skal fremgå av vedtaket om økonomisk stønad, men er i seg selv ikke et enkeltvedtak og kan derfor ikke påklages til statsforvalteren. **Source:** R-35 Para 22 (end, sub-section 4.22.1.1) / PROC-REQ-22.6 / DOC-REQ-22.1.

Requirement 7: Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. **Source:** R-35 Para 22 / PROC-REQ-22.7.

Requirement 8: Nav-kontoret bør ha tilbudt brukeren tjenesten opplysning, råd og veiledning, og prøvd å komme frem til en frivillig ordning, før det fattes vedtak om tvungen forvaltning. **Source:** Veileder sotjl. § 17 (supplementary) / PROC-REQ-22.8.

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The requirement dictates the legal destination of the benefit payment (mandatory payment directly to the applicant), which is a substantive right. *(Noted here, do not proceed to Step 3)*

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The requirement establishes the legal authority and threshold for splitting the substantive benefit among multiple intended beneficiaries. *(Noted here, do not proceed to Step 3)*

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The requirement establishes a new substantive legal destination for the benefit by introducing a consent-based third-party payment arrangement outside the immediate household. *(Noted here, do not proceed to Step 3)*

Requirement 4: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement dictates the administrative process and operational modalities for how the funds are delivered (cash, bank transfer, etc.) rather than the substantive rights to the benefit itself. *(Proceed to Step 3)*

Requirement 5: [PROCEDURAL/DOCUMENTATION] **Justification:** Ambiguous — recommend human legal review because the requirement establishes an administrative communication step (duty to consult the recipient) alongside a substantive standard (minimally burdensome method). *(Proceed to Step 3)*

Requirement 6: [PROCEDURAL/DOCUMENTATION] **Justification:** Ambiguous — recommend human legal review because it dictates explicit administrative recording (must appear in the decision letter) while concurrently stripping substantive procedural appeal rights (classifying it as not an enkeltvedtak). *(Proceed to Step 3)*

Requirement 7: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement acts as a general procedural compliance mandate requiring caseworkers to adhere to case processing rules and unwritten norms of good administrative practice. *(Proceed to Step 3)*

Requirement 8: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement dictates mandatory, sequential administrative processing steps (offering guidance and attempting voluntary arrangements) before formalizing a forced management decision. *(Proceed to Step 3)*

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 8 **Circular/Source:** R-35 Para 22 / PROC-REQ-22.4 **Nature of Procedural Requirement:** The caseworker/NAV office has the unilateral authority to determine the practical payment delivery method (e.g., cash, bank account transfer, postal order). **Legal Gap:** § 22 mandates *who* receives the

payment but is entirely silent on the *modality* of payment, granting NAV an explicit operational power without an express textual anchor in the statute. **Thematic Category:** [OTHER] (Operational delivery mechanism procedure)

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 8 **Circular/Source:** R-35 Para 22 / PROC-REQ-22.5 **Nature of Procedural Requirement:** The NAV office must consult with the benefit recipient regarding the payment form, and ensure the chosen method is least burdensome. **Legal Gap:** § 22 sets payment rules but contains no obligation to consult the user or adhere to a burden-minimization standard; the circular borrows these obligations from § 42, which is completely outside § 22's scope. **Thematic Category:** [USER-COMM]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 8 **Circular/Source:** R-35 Para 22 (end, sub-section 4.22.1.1) / PROC-REQ-22.6 / DOC-REQ-22.1 **Nature of Procedural Requirement:** The decisions regarding the chosen payment method and any third-party consent arrangements must be documented inside the formal benefit decision letter (vedtaket). **Legal Gap:** § 22 provides no requirements regarding what specific documentation or content must be recorded in the formal decision letter, nor does it provide a statutory basis for declaring these payment decisions non-appealable. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 of 8 **Circular/Source:** R-35 Para 22 / PROC-REQ-22.7 **Nature of Procedural Requirement:** The NAV office must follow general case processing standards established in the broader Social Services Act, the Public Administration Act, and unwritten administrative norms. **Legal Gap:** § 22 itself does not outline or incorporate this transversal procedural compliance mandate; though legally sound overall, its authorization derives from outside § 22. **Thematic Category:** [OTHER] (General administrative compliance processing)

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 of 8 **Circular/Source:** Veileder sotjl. § 17 (supplementary) / PROC-REQ-22.8 **Nature of Procedural Requirement:** The NAV office is required to sequentially offer information, advice, and guidance to the user to attempt a voluntary arrangement before making a decision on forced management of funds. **Legal Gap:** § 22 contains no statutory reference to, or authority over, forced management procedures or their prerequisites; this requirement belongs to an entirely different legal regime (folketrygdloven § 22-6) and is outside the scope of § 22. **Thematic Category:** [SEQUENCE]

Step 1 — Extract All Requirements for Process inflation(§ 23)

Requirement 1: Avgjørelse om å kreve tilbakebetaling er et enkeltvedtak. Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer for god forvaltningsskikk. Dette gjelder særlig kravene til utredning, varsel, begrunnelse og informasjon om klageadgangen. Source: R-35 Punkt 4.23 / DOC-REQ-23.1 / PROC-REQ-4.23.3.

Requirement 2: Der betingelsene for tilbakebetaling er til stede, må det foretas en konkret individuell vurdering av tjenestemottakers situasjon før det fattes vedtak. I denne vurderingen skal det tas hensyn til tjenestemottakers økonomiske og sosiale forhold. Source: R-35 Punkt 4.23 / DOC-REQ-23.2 / PROC-REQ-4.23.1 + 4.23.2.

Requirement 3: Når Nav-kontoret vurderer om tjenestemottaker har handlet forsettlig eller grovt uaktsomt skal personlige og individuelle forhold hos den enkelte vektlegges, som forståelse av saken og språkferdigheter, og ses i sammenheng med den informasjonen Nav-kontoret har gitt i saken. Source: R-35 Punkt 4.23 / DOC-REQ-23.3 / PROC-REQ-4.23.4.

Requirement 4: Det er ikke anledning til å motregne kravet ved å avslå eller redusere fremtidig økonomisk stønad... Source: R-35 Punkt 4.23 / PROC-REQ-4.23.5.

Requirement 5: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste – veileder 20032024 / DOC-REQ-23.4 / PROC-REQ-4.23.6.

Requirement 6: Det handler om å beskrive hvordan barnets beste er undersøkt og hvilket innhold vurderingen av barnets beste har. Det vil si hvordan vi har kommet frem til barnets beste, samt om og hvordan barnet er hørt. beskrive hvilken vekt barnets beste har fått i avveiningen mot andre hensyn og hvorfor eventuelt andre hensyn går foran. Source: Barnets beste – veileder 20032024 / DOC-REQ-23.5.

Requirement 7: Dersom vi velger et resultat som innebærer at barnets beste ikke får gjennomslag må dette begrunnes særskilt og skriftlig for å sikre etterprøvbarhet og barnets rettssikkerhet. Source: Barnets beste – veileder 20032024 / DOC-REQ-23.6.

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative processing steps, notifications, and formal reasoning required when a repayment decision is made.

Requirement 2: [PROCEDURAL/DOCUMENTATION] — Ambiguous — recommend human legal review The requirement dictates the evaluation procedure by mandating a concrete pre-decision assessment, but arguably blurs into substantive law by specifically mandating that economic and social factors must be evaluated.

Requirement 3: [PROCEDURAL/DOCUMENTATION] — Ambiguous — recommend human legal review The requirement dictates the evidence assessment procedure for establishing fault, but impacts substantive legal thresholds by fixing a mandatory weighting of specific personal and individual factors.

Requirement 4: [SUBSTANTIVE LEGAL OBLIGATION] The requirement dictates a strict legal outcome by establishing an absolute prohibition against offsetting claims through the reduction of future economic support. *(Noted here, do not proceed to Step 3 for this requirement).*

Requirement 5: [PROCEDURAL/DOCUMENTATION] The requirement explicitly dictates that the child's best interest assessment must be formally documented to allow for subsequent verification.

Requirement 6: [PROCEDURAL/DOCUMENTATION] The requirement provides a specific mandatory procedural checklist for what exact content must be described and documented in the assessment.

Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement mandates a heightened, written justification procedure that is only triggered when a specific decision outcome is reached.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 of 7 **Circular/Source:** R-35 Punkt 4.23 / DOC-REQ-23.1 / PROC-REQ-4.23.3 **Nature of Procedural Requirement:** The Nav-office must follow procedural requirements for administrative decisions (enkeltvedtak), particularly regarding investigation, notification, justification, and providing information about the right to appeal. **Legal Gap: No gap (OK)**; the circular restates independently mandatory obligations from forvaltningsloven that automatically apply to any enkeltvedtak, and does not improperly escalate the open "kan" discretion in § 23. **Thematic Category:** [OTHER] (Covers general overarching administrative rules spanning investigation, notification, and documentation).

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 of 7 **Circular/Source:** R-35 Punkt 4.23 / DOC-REQ-23.2 / PROC-REQ-4.23.1 + 4.23.2 **Nature of Procedural Requirement:** A concrete individual assessment must be performed prior to making a decision, taking into consideration the recipient's specific economic and social conditions. **Legal Gap:** The circular converts the entirely open permissive discretion ("kan") found in § 23 into a **constrained, mandatory pre-decision assessment with specific mandatory content**, eliminating the authority's freedom to decide the scope and content of its own analysis. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 of 7 **Circular/Source:** R-35 Punkt 4.23 / DOC-REQ-23.3 / PROC-REQ-4.23.4 **Nature of Procedural Requirement:** When evaluating intent or gross negligence, specific individual factors (such as understanding of the case and language skills) must be weighed and viewed in context

with the information the Nav-office provided. **Legal Gap:** The circular replaces an open normative evidence assessment with a **mandatory specific factor list**, fixing the content and weighting scope of the fault determination without an explicit statutory anchor in § 23. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 7 **Circular/Source:** Barnets beste – veileder 20032024 / DOC-REQ-23.4 / PROC-REQ-4.23.6 **Nature of Procedural Requirement:** Assessments of the child's best interests must be documented so that they can be reviewed and verified by others. **Legal Gap: No gap (OK)**; the requirement directly mirrors higher-level constitutional (Grunnloven § 104) and international law mandates requiring that children's best interests be assessed and documented in public decisions. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 7 **Circular/Source:** Barnets beste – veileder 20032024 / DOC-REQ-23.5 **Nature of Procedural Requirement:** The documentation must describe how the child's best interest was investigated, how the child was heard, and what specific weight the child's interest received when balanced against other considerations. **Legal Gap:** The specific mandatory checklist **exceeds the explicit textual requirements of Grunnloven § 104**, eliminating the authority's freedom to determine the scope and format of how it documents its constitutional obligation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 of 7 **Circular/Source:** Barnets beste – veileder 20032024 / DOC-REQ-23.6 **Nature of Procedural Requirement:** If the outcome of the decision dictates that the child's best interest does not prevail, this must be specially justified in writing. **Legal Gap:** The circular creates a **condition-triggered heightened mandatory written justification obligation** (over and above the general reasoning required by forvaltningsloven §§ 24–25) that lacks any explicit statutory or constitutional textual anchor. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 24)

Requirement 1: Krav om utlegg skal rettes til namsmannen i det distriktet tjenestemottaker har bopel. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.1).

Requirement 2: Nav-kontoret må alltid foreta en konkret individuell vurdering av om det skal gå til tvangsinndrivelse. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.2).

Requirement 3: I denne vurderingen skal det legges vekt på tjenestemottakers økonomiske situasjon, herunder om vedkommende har tilstrekkelig midler til et forsvarlig livsopphold hvis kravet inndrives. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.3).

Requirement 4: Nav-kontoret kan ikke kreve tvangsfullbyrdelse før det har gått to uker etter at det er sendt skriftlig varsel til tjenestemottaker. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.4).

Requirement 5: I varselet skal det opplyses om at tvangsfullbyrdelse vil bli begjært dersom kravet ikke oppfylles. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.5).

Requirement 6: Tjenestemottaker kan da komme med opplysninger som gjør at Nav-kontoret må foreta en ny vurdering av om kravet skal inndrives. Source: R-35, seksjon 4.24.1.1 (PROC-REQ 24.6).

Requirement 7: Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven, tvangsfullbyrdelsesloven og uskrevne normer om god forvaltningsskikk. Source: R-35, seksjon 4.24.1.2 (PROC-REQ 24.7).

Requirement 8: Dersom brukeren er under tvangsforfølgning på grunn av ubetalt gjeld bør rådgiveren kunne veilede om hvordan vedkommende kan forholde seg til en slik situasjon på best mulig måte. Source: Veileder for økonomisk rådgivning (supplementary document, PROC-REQ 24.8).

Step 2 — Classify Each Requirement

Requirement 1 [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates an administrative procedure specifying the appropriate agency (the local bailiff/namsmann) to which an enforcement claim must be routed. → *Proceed to Step 3*

Requirement 2 [PROCEDURAL/DOCUMENTATION] Justification: The requirement mandates an administrative process by requiring the office to always conduct a concrete individual assessment before proceeding with forced enforcement. → *Proceed to Step 3*

Requirement 3 [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding explicitly states that prescribing specific weighting criteria, such as a "forsvarlig livsopphold" standard, constitutes a substantive normative addition. → *Noted here, do not proceed to Step 3*

Requirement 4 [PROCEDURAL/DOCUMENTATION] Justification: The requirement establishes a sequential step-by-step procedure by imposing a two-week waiting period and a written notice precondition. → *Proceed to Step 3*

Requirement 5 [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates the mandatory informational content that must be included in the written notice communicated to the user. → *Proceed to Step 3*

Requirement 6 [PROCEDURAL/DOCUMENTATION] Justification: The requirement outlines a conditional administrative process where the receipt of new information obligates the office to conduct a new assessment. → *Proceed to Step 3*

Requirement 7 [PROCEDURAL/DOCUMENTATION] Justification: The requirement directs the office to follow administrative case processing rules and procedures from external legal frameworks like forvaltningsloven. → *Proceed to Step 3*

Requirement 8 Ambiguous — recommend human legal review (Classified as [PROCEDURAL/DOCUMENTATION]) Justification: The requirement instructs the advisor on a procedural duty to provide guidance and counseling to users facing forced execution. → *Proceed to Step 3*

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 of 8 **Circular/Source:** R-35, seksjon 4.24.1.1 (PROC-REQ 24.1) **Nature of Procedural Requirement:** The claim for execution must be directed to the bailiff (namsmann) in the recipient's district. **Legal Gap:** § 24 only establishes the substantive legal status of a claim for forced execution and is completely silent on the procedural routing rule to the local bailiff, which appears to derive from tvangsfullbyrdelsesloven. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 of 8 **Circular/Source:** R-35, seksjon 4.24.1.1 (PROC-REQ 24.2) **Nature of Procedural Requirement:** A concrete individual assessment must always be conducted to determine if forced enforcement should be initiated. **Legal Gap:** § 24 declares only that qualifying claims constitute a legal basis for enforcement and says nothing about any mandatory pre-step procedural duty to assess whether to actually initiate the enforcement. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 8 **Circular/Source:** R-35, seksjon 4.24.1.1 (PROC-REQ 24.4) **Nature of Procedural Requirement:** The office must send a written notice to the user and observe a mandatory two-week waiting period before demanding forced execution. **Legal Gap:** § 24 contains no notice requirement and no waiting period; these are procedural rules characteristic of tvangsfullbyrdelsesloven § 4-18, making their attribution to § 24 ambiguous. **Thematic Category:** [SEQUENCE]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 8 **Circular/Source:** R-35, seksjon 4.24.1.1 (PROC-REQ 24.5) **Nature of Procedural Requirement:** The written notice must state that forced execution will be petitioned if the claim is not fulfilled. **Legal Gap:** § 24 contains no requirement for written notice, nor does it specify the mandatory content of such a notice, as this rule's natural home is the Enforcement Act's notice provisions. **Thematic Category:** [USER-COMM]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 8 **Circular/Source:** R-35, seksjon 4.24.1.1 (PROC-REQ 24.6) **Nature of Procedural Requirement:** The office must conduct a new assessment of whether the claim should be enforced if the recipient submits new information. **Legal Gap:** § 24 contains no provision for re-assessment triggered

by new information from the recipient, nor does it reference a recipient's right to submit information after notice. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 of 8 **Circular/Source:** R-35, seksjon 4.24.1.2 (PROC-REQ 24.7) **Nature of Procedural Requirement:** The office must follow general case processing rules from the Social Services Act, the Public Administration Act, the Enforcement Act, and unwritten norms of good administrative practice. **Legal Gap:** There is no textual gap (flagged as HAS_HJEMMEL); this requirement is a consolidation and restatement of pre-existing and self-executing statutory obligations derived from other laws, not from § 24. **Thematic Category:** [OTHER] (General administrative compliance and cross-reference directive)

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 of 8 **Circular/Source:** Veileder for økonomisk rådgivning (supplementary document, PROC-REQ 24.8) **Nature of Procedural Requirement:** Advisors should guide users who are under forced execution on how to handle the situation in the best possible way. **Legal Gap:** § 24 concerns the municipality's enforcement rights and contains no provision for guidance or counseling duties, which legally belong to the economic counseling framework (§ 17). **Thematic Category:** [USER-COMM]

Step 1 — Extract All Requirements for Process inflation(§ 25)

Requirement 1: Nav-kontoret må foreta en konkret vurdering av tjenestemottakers økonomiske situasjon på det tidspunkt det er aktuelt å inndrive refusjonskravet. **Source:** R-35 § 25 / PROC-REQ-25.1 (End of section 4.25.1).

Requirement 2: Avgjørelse om vilkår om refusjon må klart fremgå av vedtaket om innvilgelse av økonomisk stønad. **Source:** R-35 § 25 / DOC-REQ-25.1 = PROC-REQ-25.2 (Beginning of 4.25.1.1).

Requirement 3: Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. **Source:** R-35 § 25 / PROC-REQ-25.3 (Beginning of 4.25.1.1).

Requirement 4: Hvis Nav-kontoret kommer til at kravet ikke skal inndrives, eventuelt delvis inndrives, i henhold til vilkår, skal det fattes vedtak om at vilkåret om refusjon helt eller delvis bortfalles. **Source:** R-35 § 25 / DOC-REQ-25.2 = PROC-REQ-25.4 (Middle/End of 4.25.1.1).

Requirement 5: Nav-kontoret kan begjære kravet inndrevet etter reglene i bidragsinnkrevingsloven. **Source:** R-35 § 25 / PROC-REQ-25.5 (End of section 4.25.1).

Step 2 — Classify Each Requirement

Requirement 1 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) **Justification:** The finding notes that this requirement converts the municipality's unqualified permissive authority into a "mandatory procedural sequence" by inserting a specific assessment step before an enforcement decision, but also labels the legal anchor as ambiguous ("TVETYDIG") requiring human legal review.

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding explicitly identifies this as a "mandatory documentation requirement" for instances where the municipality chooses to set the reimbursement condition.

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding states that this requirement addresses the "procedural framework surrounding exercise" of the permissive authorities by restating existing general procedural law.

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding describes this as imposing a "formal procedural step" to issue a formal decision when the municipality exercises its discretion not to enforce the claim.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding indicates this specifies which "legal framework governs the collection mechanism" without adding any mandatory force.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 of 5 / Analyst Note **Circular/Source:** R-35 § 25 / PROC-REQ-25.1 (End of section 4.25.1) **Nature of Procedural Requirement:** The Nav-office must conduct a concrete assessment of the service recipient's economic situation at the time enforcement of the reimbursement claim becomes relevant. **Legal Gap:** The Social Services Act (§ 25) grants fully open, permissive ("kan") discretion over whether and how to enforce a claim with no procedural prerequisites, whereas the circular creates a gap by substituting this open judgment with a mandatory requirement ("må") that dictates both the specific subject matter and timing of an assessment. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 of 5 **Circular/Source:** R-35 § 25 / DOC-REQ-25.1 = PROC-REQ-25.2 (Beginning of 4.25.1.1) **Nature of Procedural Requirement:** The decision to impose a condition of reimbursement must clearly appear in the administrative decision granting financial assistance. **Legal Gap:** The finding establishes no gap ("HAS_HJEMMEL" / "OK"); the rule does not restrict the Social Services Act's permissive choice to set a condition, but is merely a documentation

requirement squarely supported by the Public Administration Act (fvl. §§ 24–25). **Thematic Category:** [DOC-REQ]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 of 5 **Circular/Source:** R-35 § 25 / PROC-REQ-25.3 (Beginning of 4.25.1.1) **Nature of Procedural Requirement:** The Nav-office must follow the case processing requirements dictated by the Social Services Act, the Public Administration Act, and unwritten norms of good administrative practice. **Legal Gap:** The finding establishes no gap ("HAS_HJEMMEL" / "OK"); the circular introduces no new obligations and does not escalate the Social Services Act's language, but simply restates existing legal obligations that bind all administrative bodies. **Thematic Category:** [OTHER] (Restatement of overarching general administrative procedure).

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 5 **Circular/Source:** R-35 § 25 / DOC-REQ-25.2 = PROC-REQ-25.4 (Middle/End of 4.25.1.1) **Nature of Procedural Requirement:** If the Nav-office decides not to enforce, or only partially enforce, the claim, a formal decision must be made to fully or partially waive the reimbursement condition. **Legal Gap:** The finding establishes no gap ("HAS_HJEMMEL" / "OK"); the requirement to formally decide to waive a condition is a procedural consequence supported by the Public Administration Act (fvl. § 2) and does not constrain the underlying discretion granted by the Social Services Act over whether to enforce. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 5 **Circular/Source:** R-35 § 25 / PROC-REQ-25.5 (End of section 4.25.1) **Nature of Procedural Requirement:** The Nav-office may request that the claim be enforced according to the rules in the Contribution Enforcement Act (bidragsinnkrevingsloven). **Legal Gap:** The finding establishes no gap ("HAS_HJEMMEL" / "OK"); the circular uses the identical permissive language ("kan") as the Social Services Act and merely identifies the applicable enforcement statute without adding mandatory force. **Thematic Category:** [OTHER] (Identification of statutory enforcement mechanism).

Step 1 — Extract All Requirements for Process inflation(§ 26)

Requirement: Det må foretas en konkret vurdering av om den økonomiske stønaden er gitt for samme tidsrom som etterbetalingen. Source: R-35 Para 4.26.

Requirement: I denne vurderingen må det avklares hvilket tidsrom etterbetalingen gjelder, og om tjenestemottaker har mottatt økonomisk stønad i denne perioden. Source: R-35 Para 4.26.

Requirement: Hvert enkelt vedtak med stønadsperiode skal ses opp mot tilsvarende periode i etterbetalingen. Source: R-35 Para 4.26.

Requirement: Det må foretas en konkret vurdering av om formålet med den økonomiske stønaden og etterbetalingen er sammenfallende. Source: R-35 Para 4.26.

Requirement: I denne vurderingen må det avklares om den økonomiske stønaden er gitt for å dekke generelle utgifter til livsopphold eller for å dekke særlige utgifter. Source: R-35 Para 4.26.

Requirement: Videre skal det på tilsvarende måte avklares hva etterbetalingen er ment å dekke. Source: R-35 Para 4.26.

Requirement: Der betingelsene for refusjon er til stede, må det foretas en konkret, individuell vurdering av tjenestemottakers situasjon før det fattes vedtak. Source: R-35 Para 4.26.

Requirement: I denne vurderingen skal det tas hensyn til tjenestemottakers økonomiske situasjon... Source: R-35 Para 4.26.

Requirement: Kommunen i Nav må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. Source: R-35 Para 4.26.

Requirement: Tjenestemottaker skal i henhold til god forvaltningsskikk informeres om mulig refusjon i vedtak om tildeling av økonomisk stønad... Source: R-35 Para 4.26.

Requirement: Kommunen i Nav bør informere Arbeids- og velferdsetaten om mulig refusjonskrav, slik at etaten kan holde tilbake ytelsen... Source: R-35 Para 4.26.

Requirement: Når Arbeids- og velferdsetaten har fattet sitt vedtak, skal kommunen i Nav varsle tjenestemottaker om mulig refusjonsvedtak... Source: R-35 Para 4.26.

Requirement: Tjenestemottaker skal gis en kort frist til å uttale seg. Source: R-35 Para 4.26.

Requirement: Vedtak om refusjon skal begrunnes. Source: R-35 Para 4.26.

Requirement: Tjenestemottaker skal gis en detaljert oversikt over utbetalinger, hvilke perioder utbetalingene refererer seg til og til hvilket formål utbetalingene er gitt. Source: R-35 Para 4.26.

Requirement: Det skal videre presiseres hvilke utbetalinger det kreves refusjon for. Source: R-35 Para 4.26.

Requirement: Det skal til slutt fremkomme hvor mye tjenestemottaker har fått etterbetalt i trygdeytelse for tilsvarende periode, etter at det er tatt hensyn til skattetrekk og eventuelle andre trekk. Source: R-35 Para 4.26.

Requirement: Vedtak om refusjon skal sendes til tjenestemottaker. Source: R-35 Para 4.26.

Requirement: Kommunen i Nav må sende skriftlig krav om refusjon til Arbeids- og velferdsetaten. Source: R-35 Para 4.26.

Requirement: Refusjonskravet må inneholde opplysninger om beløpet som kreves refundert, samt hvilket tidsrom og formål beløpet gjelder. Source: R-35 Para 4.26.

Requirement: Hvis det skal kreves refusjon i dagpenger, må refusjonskravet være fremmet ovenfor Arbeids- og velferdsetaten den dagen etterbetalingen av dagpengene er klar... Source: R-35 Para 4.26.

Requirement: Hvis kommunen i Nav er kjent med at tjenestemottaker har søkt dagpenger... kan det vurderes å gi økonomisk stønad som lån for å sikre seg retten til å kreve tilbakebetaling. Source: R-35 Para 4.26.

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates an administrative procedure by mandating a specific "konkret vurdering" to check the period overlap.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement governs the casework process by prescribing specific mandatory verification sub-questions the caseworker must resolve.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement establishes a specific, step-by-step administrative grant-by-grant comparison methodology.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates how an evaluation must be conducted by demanding a mandatory "konkret vurdering" to compare purpose overlap.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: Ambiguous — recommend human legal review; the requirement mandates an assessment process to resolve specific questions, but introduces substantive binary categorizations (general vs. special expenses) lacking in the statute.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement adds a specific mandatory procedural verification step to clarify what the retroactive benefit is meant to cover.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement establishes a mandatory procedural prerequisite ("konkret, individuell vurdering") that must be completed before a decision can be made.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement governs the legal content of the decision by mandating that a specific substantive factor, the user's economic situation, must be considered. *(Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3)*

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement generally directs caseworkers to follow established administrative processing rules and norms under the law.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates how communication with the user must be structured by imposing an advance notification duty at the initial grant stage.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement recommends an inter-agency communication procedure by advising the municipality to inform the state agency about a possible claim.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement outlines user communication by dictating the mandatory administrative step of providing advance notice (forhåndsvarsel).

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement governs the administrative process by establishing a procedural time limit for the user to submit comments.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates how a decision must be documented by requiring formal written reasoning.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates decision documentation formats by demanding a detailed overview with strictly enumerated content elements.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement sets a mandatory documentation obligation by forcing the caseworker to detail exactly which payments are being claimed.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement sets out exactly how specific accounting calculations must be presented within the final decision document.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement outlines the final administrative step of sending the decision document to the user.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates administrative form and routing by specifying that the refund claim must be in writing and addressed to a specific agency.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates the specific informational content fields that must be populated in the refund claim document.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The requirement imposes a strict procedural timeline on when the caseworker must submit a dagpenger refund claim.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement concerns the substantive form of the benefit granted (converting a grant into a loan) under a

distinct legal provision (§ 21). *(Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3)*

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: PROC-REQ 26.1 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The caseworker must perform a concrete assessment to verify if the economic support was given for the same period as the retroactive payment. Legal Gap: The statute is completely silent on the method of verification, while the circular escalates this open condition into a mandatory, explicitly qualified procedure ("konkret vurdering"). Thematic Category: [ASSESS-PROC]

Requirement Reference: 2 Finding Reference: PROC-REQ 26.2 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The caseworker must specifically clarify which period the retroactive payment covers and whether the user received economic support during that time. Legal Gap: The statute states the period-overlap condition without enumerating sub-questions, but the circular establishes two distinct mandatory verification steps that exceed statutory text. Thematic Category: [ASSESS-PROC]

Requirement Reference: 3 Finding Reference: PROC-REQ 26.3 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: Each individual support grant decision must be compared against the corresponding period in the retroactive payment. Legal Gap: The statute requires period overlap but leaves the comparison method open, whereas the circular enforces a specific grant-by-grant comparison methodology using "shall". Thematic Category: [ASSESS-PROC]

Requirement Reference: 4 Finding Reference: PROC-REQ 26.4 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: A concrete assessment must be made to determine if the purpose of the economic support and the retroactive payment coincide. Legal Gap: The statute states "same purpose" as a condition but does not prescribe the assessment method, while the circular mandates a specific "konkret vurdering" eliminating methodological freedom. Thematic Category: [ASSESS-PROC]

Requirement Reference: 5 Finding Reference: PROC-REQ 26.5 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The caseworker must clarify whether the economic support was granted to cover general living expenses or special expenses. Legal Gap: The statute uses an open normative term ("same purpose"), but the circular introduces a specific mandatory binary classification scheme without statutory grounding. Thematic Category: [ASSESS-PROC]

Requirement Reference: 6 Finding Reference: PROC-REQ 26.6 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The caseworker must conduct a separate verification step to clarify exactly what the retroactive payment is meant to cover. Legal Gap: The statute leaves open how purpose comparison is structured, but the circular fixes a separate, mandatory procedural step for one side of the comparison not demanded by the statute. Thematic Category: [ASSESS-PROC]

Requirement Reference: 7 Finding Reference: PROC-REQ 26.7 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The caseworker must complete a concrete, individual assessment of the user's situation prior to making a decision on the refund. Legal Gap: The statute provides a free permissive right to claim a refund without prior assessment procedure, but the circular mandates this specific procedure as a gating prerequisite before acting. Thematic Category: [SEQUENCE]

Requirement Reference: 9 Finding Reference: PROC-REQ 26.9 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The authority must follow general case processing requirements under the Public Administration Act, the Social Services Act, and norms of good administrative practice. Legal Gap: None established; this requirement mirrors the mandatory nature of external legal frameworks and does not escalate the law's "kan" discretion. Thematic Category: [OTHER] *Description:* General adherence to existing overarching administrative law frameworks.

Requirement Reference: 10 Finding Reference: PROC-REQ 26.10 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The user must be informed about a possible future refund during the initial decision to grant economic support. Legal Gap: The statute is entirely silent on any notification duty at the initial grant stage, but the circular extends a mandatory procedural duty into space opened by the permissive "kan". Thematic Category: [USER-COMM]

Requirement Reference: 11 Finding Reference: PROC-REQ 26.11 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The municipality should inform the state NAV administration about a possible refund claim so they can hold back the payment. Legal Gap: The statute does not explicitly mention notifying NAV to exercise the right; however, no shadow binding exists because the circular uses permissive "bør" (should) rather than mandatory language. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 12 Finding Reference: PROC-REQ 26.12 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The municipality must notify the user about a possible refund decision once the state agency has made its retroactive benefit decision. Legal Gap: None established; the requirement directly mirrors the independently mandatory advance notice (forhåndsvarsel) requirement under FVL § 16. Thematic Category: [USER-COMM]

Requirement Reference: 13 Finding Reference: PROC-REQ 26.13 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The user must be given a short deadline to submit comments on the potential decision. Legal Gap: None established; the requirement directly mirrors the user's mandatory right to comment before a decision under FVL § 16. Thematic Category: [USER-COMM]

Requirement Reference: 14 Finding Reference: PROC-REQ 26.14 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: Decisions regarding refunds must be properly reasoned in writing. Legal Gap: None established; the requirement directly mirrors the mandatory written reasoning (begrunnelse) obligation for individual decisions under FVL § 24. Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: PROC-REQ 26.15 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The decision document must provide the user with a detailed overview outlining past payments, their specific periods, and their specific purposes. Legal Gap: The statute leaves the format and specific content of the decision entirely open, but the circular dictates specific, enumerated content elements in a mandatory "detaljert oversikt". Thematic Category: [DOC-REQ]

Requirement Reference: 16 Finding Reference: PROC-REQ 26.16 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The decision document must specify exactly which prior individual payments are being claimed for refund. Legal Gap: The statute does not mandate detailing specific prior payments, but the circular creates a mandatory content obligation, exceeding what is explicitly required by FVL § 25. Thematic Category: [DOC-REQ]

Requirement Reference: 17 Finding Reference: PROC-REQ 26.17 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The decision must display a calculation showing how much the user retroactively received after tax and other deductions are taken into account. Legal Gap: The statute references the retroactive amount but does not require presenting the specific net amount after deductions, thereby fixing an accounting presentation requirement not found in the law. Thematic Category: [DOC-REQ]

Requirement Reference: 18 Finding Reference: PROC-REQ 26.18 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The finalized refund decision must be sent to the user. Legal Gap: None established; the requirement mirrors the independent mandatory notification requirement for individual decisions found in FVL § 27. Thematic Category: [USER-COMM]

Requirement Reference: 19 Finding Reference: PROC-REQ 26.19 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The municipality must send a written refund claim specifically to the state NAV administration. Legal Gap: The statute grants the right to a refund but does not strictly specify the written form or the inter-agency addressee for the mechanism; though ambiguous, it operates as a practical implementation step rather than restricting the authority's primary discretion. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 20 Finding Reference: PROC-REQ 26.20 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: The refund claim document must contain explicit information detailing the claimed amount, the timeframe, and the purpose. Legal Gap: None established; the three required content elements directly track and reflect the precise conditions already present in the statute. Thematic Category: [DOC-REQ]

Requirement Reference: 21 Finding Reference: PROC-REQ 26.21 av 22 Circular/Source: R-35 Para 4.26 Nature of Procedural Requirement: Refund claims targeting unemployment benefits (dagpenger) must be submitted to the state agency on the exact same day the retroactive payment is cleared. Legal Gap: None established; the same-day operational deadline is governed strictly by the independent holding-back mechanisms established in Folketrygdloven § 22-7. Thematic Category: [SEQUENCE]

Step 1 — Extract All Requirements for Process inflation(§ 27)

Requirement 1: Søknad om midlertidig botilbud må vurderes samme dag som den er mottatt Source: R-35 Para 27 / PROC-REQ-27.1.

Requirement 2: og hvilke opplysninger som er nødvendige må begrenses til den konkrete situasjon. Source: R-35 Para 27 / PROC-REQ-27.2.

Requirement 3: Nav-kontoret må vurdere om det midlertidige botilbudet er egnet til å ivareta disse behovene. Source: R-35 Para 27 / PROC-REQ-27.3.

Requirement 4: Nav-kontoret må sikre at det midlertidige botilbudet som benyttes er forsvarlig. Source: R-35 Para 27 / PROC-REQ-27.4.

Requirement 5: Bruk av midlertidig botilbud skal begrenses i omfang og lengde Source: R-35 Para 27 / PROC-REQ-27.5.

Requirement 6: Midlertidig botilbud skal kun unntaksvis benyttes til barnefamilier og ungdom og aldri vare i mer enn tre måneder. Source: R-35 Para 27 / PROC-REQ-27.6.

Requirement 7: Når midlertidig botilbud benyttes, skal Nav-kontoret så vidt mulig umiddelbart iverksette tiltak for å sikre overgang til varig botilbud. Source: R-35 Para 27 / PROC-REQ-27.7.

Requirement 8: Nav-kontoret skal sørge for at tjenestemottaker innkalles til oppfølgingssamtale snarest mulig Source: R-35 Para 27 / PROC-REQ-27.8.

Requirement 9: Nav-kontoret må alltid vurdere personens situasjon her og nå. Source: R-35 Para 27 / PROC-REQ-27.9.

Requirement 10: Avgjørelse om innvilgelse eller avslag på midlertidig botilbud er enkeltvedtak. Source: R-35 Para 27 / DOC-REQ-27.1.

Requirement 11: Hvilken opplysning, råd og veiledning hun har fått, omtales i vedtaket om midlertidig botilbud. Source: Veileder til sotjl. § 17 / DOC-REQ-27.4.

Requirement 12: Hvis tjenestemottaker ikke har penger til å betale for det midlertidige botilbudet, må Nav-kontoret vurdere om tjenestemottaker skal innvilges økonomisk stønad. Source: R-35 Para 27.

Requirement 13: For tjenestemottakere som ikke klarer å ivareta sine interesser på boligmarkedet, bør bolig og nødvendige tjenester for å sikre en stabil bosituasjon være en del av individuell plan. Source: R-35 Para 27.

Requirement 14: Hvis Nav-kontoret ikke finner tilbud, eller tilbudet ikke er kvalitetsmessig forsvarlig bør det sendes avvik. Source: Veiviser for midlertidig botilbud.

Requirement 15: Hvis bruker har forsørgeransvar skal det legges særlig vekt på at barn og unges behov blir ivaretatt. Source: Veiviser for midlertidig botilbud.

Requirement 16: Nav-kontoret har plikt til å henvise til andre forvaltningsorgan i tillfeller der veiledningsbehovet går ut over Nav-kontorets myndighetsområde, og skal 'så vidt mulig' sørge for at andre instanser gir hjelp. Source: Veiviser for midlertidig botilbud.

Requirement 17: Midlertidig botilbud skal kun unntaksvis benyttes ved løslatelse fra fengsel eller ved utskriving fra institusjon. Nav-kontoret bør sikre direkte overgang til varig botilbud for personer i slike sårbare faser. Source: Nasjonal veileder for kriminalomsorg / Nav.

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement converts open discretion regarding procedural timing into a fixed administrative rule for evaluating an application,.

Requirement 2: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative process by imposing a mandatory constraint limiting factual evidence-gathering to the immediate situation.

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] The requirement addresses the legal threshold and adequacy of the housing outcome, as finding an offer implies finding housing that works for the individual,.

Requirement 4: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes an open normative standard regarding the legal adequacy ("forsvarlig") of the temporary housing offer,.

Requirement 5: [SUBSTANTIVE LEGAL OBLIGATION] The requirement creates a mandatory limitation rule on the substantive scope and duration of the user's right to housing,.

Requirement 6: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes an absolute numerical duration ceiling and categorical prohibition that limits the substantive legal duty towards specific user groups.

Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement dictates a time-pressured sequential step commanding the authority to initiate measures securing transition to permanent housing,.

Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement imposes a specific procedural obligation to summon the user to an administrative follow-up conversation,.

Requirement 9: [PROCEDURAL/DOCUMENTATION] The requirement converts the administrative evidence-gathering process into a fixed procedure mandating a fresh "here and now" assessment in all cases.

Requirement 10: [PROCEDURAL/DOCUMENTATION] The requirement classifies the decision's legal form, directly dictating how the case is processed and documented under the Public Administration Act,.

Requirement 11: [PROCEDURAL/DOCUMENTATION] The requirement establishes a mandatory rule regarding what specific advice and guidance must be documented in the final decision,.

Requirement 12: [PROCEDURAL/DOCUMENTATION] The requirement dictates a sequential administrative assessment step to evaluate a user's need for economic support.

Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement concerns inter-agency administrative planning, specifically documenting housing solutions within an individual plan.

Requirement 14: [PROCEDURAL/DOCUMENTATION] The requirement dictates an internal quality management procedure, mandating the reporting of deviations.

Requirement 15: [SUBSTANTIVE LEGAL OBLIGATION] The requirement dictates the legal standard by requiring special weight be given to the substantive needs of children and youth in the decision,.

Requirement 16: [PROCEDURAL/DOCUMENTATION] The requirement dictates an administrative referral process and inter-agency coordination procedure.

Requirement 17: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement contains both a substantive restriction on eligible user categories upon release and a procedural step to secure transition, making it inherently mixed,.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: REQUIREMENT 1 av 11 Circular/Source: R-35 Para 27 / PROC-REQ-27.1 Nature of Procedural Requirement: Applications must be evaluated on the same day they are received. Legal Gap: The statute is silent on procedural timing, granting wide discretion, but the circular imposes a fixed, mandatory "same day" evaluation timeframe with no textual basis,. Thematic Category: [ASSESS-PROC]

Requirement Reference: 2 Finding Reference: REQUIREMENT 2 av 11 Circular/Source: R-35 Para 27 / PROC-REQ-27.2 Nature of Procedural Requirement: The process of gathering information must be strictly limited to the concrete situation at hand. Legal Gap: The law leaves the authority's evidence-gathering discretion completely open, while the circular imposes a mandatory limitation rule on how facts can be collected,. Thematic Category: [ASSESS-PROC]

Requirement Reference: 7 Finding Reference: REQUIREMENT 7 av 11 Circular/Source: R-35 Para 27 / PROC-REQ-27.7 Nature of Procedural Requirement: The office must as far as possible immediately initiate measures to secure the user's transition to permanent housing. Legal Gap: The statute grants open discretion over post-placement follow-up and contains no affirmative duty for permanent housing, but the circular converts this into an immediate, time-pressured mandatory sequence,. Thematic Category: [SEQUENCE]

Requirement Reference: 8 Finding Reference: REQUIREMENT 8 av 11 Circular/Source: R-35 Para 27 / PROC-REQ-27.8 Nature of Procedural Requirement: The authority must summon the service recipient to a follow-up conversation as soon as possible. Legal Gap: The statute is entirely silent on follow-up requirements, whereas the circular creates a fixed procedural communication duty qualified by urgency without any authorization,. Thematic Category: [USER-COMM]

Requirement Reference: 9 Finding Reference: REQUIREMENT 9 av 11 Circular/Source: R-35 Para 27 / PROC-REQ-27.9 Nature of Procedural Requirement: The office must always evaluate the person's immediate "here and now" situation. Legal Gap: The law implies situational assessment but leaves the method open; the circular turns this into an absolute, exceptionless mandatory procedure, eliminating all evidence-gathering flexibility. Thematic Category: [ASSESS-PROC]

Requirement Reference: 10 Finding Reference: REQUIREMENT 10 av 11 Circular/Source: R-35 Para 27 / DOC-REQ-27.1 Nature of Procedural Requirement: The decision on temporary housing must be documented and handled formally as an enkeltvedtak. Legal Gap: No gap exists; the finding establishes that this correctly restates mandatory-closed legal classifications established by general administrative law and preparatory works,. Thematic Category: [DOC-REQ]

Requirement Reference: 11 Finding Reference: REQUIREMENT 11 av 11 Circular/Source: Veileder til sotjl. § 17 / DOC-REQ-27.4 Nature of Procedural Requirement: The specific information, advice, and guidance given to the user must be documented inside the written decision. Legal Gap: The statute is totally silent on decision content, but the circular imposes a fixed mandatory documentation requirement exceeding the general reasons required by the Public Administration Act,. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: ORPHAN REQUIREMENTS (1) Circular/Source: R-35 Para 27 Nature of Procedural Requirement: The office must assess if the recipient should be granted economic support to pay for the housing. Legal Gap: The requirement dictates a sequential evaluation process but there is no corresponding statutory text provided in the source to authorize or assess this duty,. Thematic Category: [ASSESS-PROC]

Requirement Reference: 13 Finding Reference: ORPHAN REQUIREMENTS (2) Circular/Source: R-35 Para 27 Nature of Procedural Requirement: The provision of housing and stabilization services should be included as part of an individual plan. Legal Gap: The requirement relies on provisions for individual planning, but the associated statutory link is completely absent from the provided source document,. Thematic Category: [DOC-REQ]

Requirement Reference: 14 Finding Reference: ORPHAN REQUIREMENTS (3) Circular/Source: Veiviser for midlertidig botilbud Nature of Procedural Requirement: The office should submit a deviation report (avvik) if an offer cannot be found or lacks sound quality. Legal Gap: The procedure dictates internal quality management and reporting, but lacks any identifiable statutory authorization or citation in the source,. Thematic Category: [REPORTING]

Requirement Reference: 16 Finding Reference: ORPHAN REQUIREMENTS (5) Circular/Source: Veiviser for midlertidig botilbud Nature of Procedural Requirement: The office must refer users to other administrative bodies and ensure they provide help when guidance needs exceed their own authority. Legal Gap: The circular establishes a mandatory inter-agency coordination duty using strict language ("plikt", "skal"), yet identifies absolutely no legal basis or statutory link for it,. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 17 Finding Reference: ORPHAN REQUIREMENTS (6) Circular/Source: Nasjonal veileder for kriminalomsorg / Nav Nature of Procedural Requirement: Use of the housing offer is strictly restricted for prison releases, and the office should ensure a direct transition to permanent housing for these users. Legal Gap: The unconditional statutory right to housing is categorically restricted and appended with a transitional procedure without any cited legal basis, conflicting with the absolute duty confirmed by case law,. Thematic Category: [SEQUENCE]

Step 1 — Extract All Requirements for Process inflation(§ 28)

Requirement: Planen skal oppdateres løpende.... Source: R-35 § 28, Middle of paragraph. Requirement: ...en plan som sammenfatter vurderinger av behov og virkemidler, og som angir et helhetlig og begrunnet tjenestetilbud.. Source: R-35 § 28, Middle of paragraph. Requirement: ...avgjørelser om tjenester fattes i egne vedtak etter bestemmelsene som gjelder for tjenesten.. Source: R-35 § 28, Middle of paragraph. Requirement: Den individuelle planens innhold og omfang skal tilpasses behovene til den enkelte tjenestemottaker.. Source: R-35 § 28, Middle of paragraph. Requirement: Det skal kun utarbeides én individuell plan for hver enkelt tjenestemottaker.. Source: R-35 § 28, Middle of paragraph. Requirement: Planen skal holdes oppdatert.. Source: R-35 § 28, Middle of paragraph. Requirement: en oversikt over tjenestemottakers mål, ressurser og behov for tjenester eller tiltak. Source: R-35 § 28, Middle of paragraph. Requirement: en oversikt over hvem som deltar i arbeidet med planen. Source: R-35 § 28, Middle of paragraph. Requirement: en angivelse av hvem som har ansvar for å utarbeide planen, og hvem som har ansvar for å sikre koordinering og fremdrift i arbeidet med planen. Source: R-35 § 28, Middle of paragraph. Requirement: en oversikt over hva tjenestemottakeren, tjenesteyterne og eventuelt pårørende vil bidra med i planarbeidet. Source: R-35 § 28, Middle of paragraph. Requirement: en oversikt over aktuelle tjenester og tiltak, omfanget av dem, og hvem som skal ha ansvaret for dem. Source: R-35 § 28, Middle of paragraph. Requirement: en beskrivelse av hvordan tjenestene eller tiltakene skal gjennomføres. Source: R-35 § 28, Middle of paragraph. Requirement: en angivelse av om tjenestemottakeren har fått tilbud om eller fått oppnevnt koordinator... barnekoordinator... eller kontaktlege.... Source: R-35 § 28, Middle of paragraph. Requirement: en angivelse av planperioden og tidspunkt for eventuelle

justeringer og revisjoner av planen. Source: R-35 § 28, Middle of paragraph. Requirement: tjenestemottakerens samtykke til at planen utarbeides og eventuelt samtykke til at deltakere i planleggingen gis tilgang til taushetsbelagte opplysninger. Source: R-35 § 28, Middle of paragraph. Requirement: en oversikt over nødvendig eller ønskelig samarbeid med andre tjenesteytere.. Source: R-35 § 28, Middle of paragraph. Requirement: Dersom tjenestemottakeren er et barn, skal det også gis en beskrivelse av hvordan barnets rett til medvirkning er ivaretatt i arbeidet med planen. Source: R-35 § 28, Middle of paragraph. Requirement: Kommunen bør være oppmerksom på at innsatte ofte har behov for koordinerte og samordnede tjenester under og etter straffegjennomføringen, og at individuell plan kan benyttes i større grad for denne gruppen.. Source: Kommunebrev 2025. Requirement: Forskriften regulerer hva en slik plan skal inneholde, og avklarer ansvarsforholdet mellom de ulike tjenestene.. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav. Requirement: En IP skal blant annet inneholde en angivelse av hvem som har ansvar for å utarbeide planen og hvem som har ansvar for å sikre koordinering og fremdrift i arbeidet med planen.... Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav. Requirement: Kriminalomsorgens planarbeid bør samstemmes med den individuelle planen og POP kan inngå som en delplan under den individuelle planen.. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav. Requirement: En individuell plan skal sammenfatte vurderinger av behov og virkemidler, og angi et helhetlig og begrunnet tjenestetilbud på tvers av de offentlige instansene som deltar med tiltak og tjenester i planen.. Source: Veileder til sosialtjenesteloven § 17. Requirement: Planen skal utformes i samarbeid med tjenestemottakeren. Source: R-35 § 28, Beginning of paragraph. Requirement: Kommunen skal samarbeide med andre tjenesteytere om planen for å bidra til et helhetlig tilbud for den det gjelder.. Source: R-35 § 28, Beginning of paragraph. Requirement: Planen skal oppdateres løpende og være et dynamisk verktøy i koordinering og målretting av tjenestetilbudet.. Source: R-35 § 28, Middle of paragraph. Requirement: Hvis tjenestemottaker ikke ønsker en individuell plan, eller ikke bidrar til å utforme den, skal planen ikke utarbeides.. Source: R-35 § 28, Middle of paragraph. Requirement: Barnet skal bli lyttet til, og barnets synspunkter skal vektlegges i samsvar med barnets alder og modenhet.. Source: R-35 § 28, Middle of paragraph. Requirement: Individuell plan skal ikke utarbeides uten samtykke fra tjenestemottakeren eller den som har rett til å samtykke.... Source: R-35 § 28, Middle of paragraph. Requirement: Arbeids- og velferdsforvaltningen... har en selvstendig plikt til å sørge for at arbeidet med individuell plan igangsettes.... Source: R-35 § 28, Middle of paragraph. Requirement: ...skal det avtales hvilken velferdstjeneste som skal ha hovedansvaret for utarbeidelse og oppfølgning av den individuelle planen.. Source: R-35 § 28, Middle of paragraph. Requirement: Den individuelle planens innhold og omfang skal tilpasses behovene til den enkelte tjenestemottaker. Det skal under utarbeidelsen tas hensyn til tjenestemottakerens kulturelle og språklige bakgrunn.. Source: R-35 § 28, End of paragraph. Requirement: Kommunen bør være oppmerksom på at innsatte ofte har behov for koordinerte og samordnede tjenester under og etter straffegjennomføringen, og at individuell plan kan benyttes i større grad for denne gruppen.. Source: Kommunebrev 2025. Requirement: Kriminalomsorgens planarbeid bør samstemmes med den individuelle planen og POP kan inngå som en delplan under den individuelle planen.. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav. Requirement: Både barnevernstjenesten og Nav-kontoret må undersøke om det allerede foreligger en individuell plan og eventuelt være en bidragsyter i denne.. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret. Requirement: En

individuell plan skal sammenfatte vurderinger av behov og virkemidler, og angi et helhetlig og begrunnet tjenestetilbud på tvers av de offentlige instansene som deltar med tiltak og tjenester i planen.. Source: Veileder til sosialtjenesteloven § 17.

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the administrative frequency and process for managing and updating the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates a fixed documentary method for synthesizing and recording assessments within the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the external administrative procedure of formalizing service allocations through separate formal decisions (vedtak). Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Concerns the substantive legal standard for tailoring the scope and content of the plan to the user's needs. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the structural administrative limit of producing only one plan per recipient. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the ongoing administrative process of maintaining the document. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates a specific informational overview that must be recorded in the plan document. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates documenting the specific participants involved in the plan's formulation. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates recording structural coordination details regarding who holds responsibility for drafting and progress. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates documenting the contributions expected from all involved parties in the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates listing services, scope, and responsibility allocations directly in the plan form. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the inclusion of a written description covering how services will be implemented. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates recording administrative status updates concerning coordinator appointments. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates documenting temporal constraints and revision timelines in the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the required documentation of user consent within the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates recording the inter-agency cooperation structure needed for the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates specific specialized documentary requirements detailing how a child's participation rights were handled. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Concerns the substantive factual assessment (evidence-discretion) regarding whether a specific group (inmates) qualifies for a statutory right. Requirement: [PROCEDURAL/DOCUMENTATION] Provides a descriptive structural overview of how the regulation allocates responsibility. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the documentary recording of responsibility for coordinating and progressing the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the inter-agency procedure of aligning correctional planning forms (POP) with the individual plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates a required formula for documenting assessments and reasoning across multiple public agencies. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the cooperative procedural process for formulating the plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the process of inter-agency cooperation required during planning. Requirement:

[PROCEDURAL/DOCUMENTATION] Dictates the specific administrative frequency and dynamic functional handling of the plan updates. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Establishes a threshold condition (user's lack of contribution) that dictates the substantive legal outcome by extinguishing the right to a plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the procedural requirements for listening to and weighting a child's views during planning. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the required procedural step of securing consent before initiating administrative planning work. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates an administrative process by imposing an independent duty on specific agencies to initiate work. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the inter-agency procedural agreement on which service holds primary responsibility. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Dictates the substantive legal standard for adapting plan content, including cultural and linguistic considerations. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Concerns the substantive evidence-discretion regarding inmates' qualifying needs for coordinated services. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates the process of coordinating correctional instruments (POP) into the overarching plan structure. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates a mandatory administrative investigation procedure agencies must follow before creating a new plan. Requirement: [PROCEDURAL/DOCUMENTATION] Dictates a fixed three-part documentary formula for summarizing assessments and reasoning across agencies.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: DOC-REQ 28.1 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates the administrative frequency and process for managing and updating the plan. Legal Gap: The circular imposes a continuous-updating duty ("løpende") without regulatory citation, which exceeds the open mandate in the regulation to simply keep the plan updated. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: DOC-REQ 28.2 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates a fixed documentary method for synthesizing and recording assessments within the plan. Legal Gap: Converts the open normative outcome standard ("helhetlig tilbud") into a specific, fixed documentation formula, eliminating municipal latitude on how comprehensive service coordination is documented. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: DOC-REQ 28.3 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates the administrative procedure for formalizing service decisions. Legal Gap: Ambiguous context — the requirement to use formal decisions (vedtak) stems from general administrative law and other service statutes, meaning it falls entirely outside the discretionary scope and delegation of § 28. Thematic Category: [OTHER] (General administrative law procedure outside plan context).

Requirement Reference: 5 Finding Reference: DOC-REQ 28.5 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Limits documentation to only one

individual plan per recipient. Legal Gap: None established; requirement is validly authorized under FOR-2022-06-22-1110-§9 covering scope and content. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: DOC-REQ 28.6 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates that the plan document must be maintained. Legal Gap: None established; expressly authorized by FOR-2022-06-22-1110-§9. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: DOC-REQ 28.7 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates inclusion of an overview of goals, resources, and needs in the plan. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: DOC-REQ 28.8 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates listing who participates in the plan's work. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: DOC-REQ 28.9 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates indicating responsible persons for drafting, coordination, and progress. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 10 Finding Reference: DOC-REQ 28.10 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates an overview of the contributions expected from recipient, providers, and relatives. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 11 Finding Reference: DOC-REQ 28.11 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates an overview of current services, scope, and responsibility allocations. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: DOC-REQ 28.12 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates describing the implementation of services or measures. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 13 Finding Reference: DOC-REQ 28.13 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates indicating if the user has been offered or assigned coordinators. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 14 Finding Reference: DOC-REQ 28.14 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates indicating the plan period and time for adjustments. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: DOC-REQ 28.15 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates documenting the recipient's consent to the plan and confidentiality exemptions. Legal Gap: None established; restates mandatory content from validly issued regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 16 Finding Reference: DOC-REQ 28.16 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates an overview of required or desired cooperation with other providers. Legal Gap: None established; doubly anchored in the statutory cooperation duty and the regulation. Thematic Category: [DOC-REQ]

Requirement Reference: 17 Finding Reference: DOC-REQ 28.17 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates describing how a child's right to participate was ensured in the plan. Legal Gap: None established; authorized under the regulation and children's participation rights. Thematic Category: [DOC-REQ]

Requirement Reference: 19 Finding Reference: DOC-REQ 28.19 Circular/Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav Nature of Procedural Requirement: Provides a descriptive explanation of what the regulation regulates regarding content and responsibility. Legal Gap: None established; it is a descriptive statement that imposes no novel obligation. Thematic Category: [OTHER] (Explanatory description).

Requirement Reference: 20 Finding Reference: DOC-REQ 28.20 Circular/Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav Nature of Procedural Requirement: Dictates recording who bears responsibility for formulation and coordination. Legal Gap: None established; restatement of regulation content authorized by FOR-2022-06-22-1110-§9. Thematic Category: [DOC-REQ]

Requirement Reference: 21 Finding Reference: DOC-REQ 28.21 Circular/Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav Nature of Procedural Requirement: Dictates the alignment and integration of correctional justice plans (POP) as a sub-plan. Legal Gap: The explicit use of the correctional plan (POP) as a sub-plan stems from correctional practice, falling outside the statutory or delegated scope of § 28. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 22 Finding Reference: DOC-REQ 28.22 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Dictates cross-agency documentation synthesizing needs, means, and reasoning into a stated offer. Legal Gap: Converts the open statutory normative standard ("helhetlig tilbud") into a fixed, three-part documentation formula spanning all public agencies, eliminating municipal discretion on the procedural method. Thematic Category: [DOC-REQ]

Requirement Reference: 23 Finding Reference: PROC-REQ 28.1 Circular/Source: R-35 § 28, Beginning of paragraph Nature of Procedural Requirement: Dictates formulating the plan in cooperation with the recipient. Legal Gap: None established; verbatim restatement of direct statutory authority § 28(2). Thematic Category: [USER-COMM]

Requirement Reference: 24 Finding Reference: PROC-REQ 28.2 Circular/Source: R-35 § 28, Beginning of paragraph Nature of Procedural Requirement: Dictates cooperating with other service providers to achieve a comprehensive offer. Legal Gap: None established;

verbatim restatement of direct statutory authority § 28(3). Thematic Category: [REFERRAL-COORD]

Requirement Reference: 25 Finding Reference: PROC-REQ 28.3 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates that the plan must be a dynamic tool that is continuously updated for coordination. Legal Gap: Converts the regulation's open "holdes oppdatert" mandate into a specific mandatory continuous frequency ("løpende") and functional process, escalating beyond authorized latitude. Thematic Category: [DOC-REQ]

Requirement Reference: 27 Finding Reference: PROC-REQ 28.5 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates the process for communicating with children and assigning weight to their views. Legal Gap: None established; authorized directly by FOR-2022-06-22-1110-§4. Thematic Category: [USER-COMM]

Requirement Reference: 28 Finding Reference: PROC-REQ 28.6 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates the prerequisite of obtaining user consent before developing the plan. Legal Gap: None established; requirement originates from and is authorized by FOR-2022-06-22-1110-§5. Thematic Category: [USER-COMM]

Requirement Reference: 29 Finding Reference: PROC-REQ 28.7 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Imposes an independent administrative duty on welfare and employment offices to initiate plan procedures. Legal Gap: None established; explicitly authorized under FOR-2022-06-22-1110-§6. Thematic Category: [SEQUENCE]

Requirement Reference: 30 Finding Reference: PROC-REQ 28.8 Circular/Source: R-35 § 28, Middle of paragraph Nature of Procedural Requirement: Dictates clarifying and agreeing upon which service holds main responsibility for preparation and follow-up. Legal Gap: None established; authorized by FOR-2022-06-22-1110-§7 covering responsibility clarification. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 33 Finding Reference: PROC-REQ 28.11 Circular/Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav Nature of Procedural Requirement: Dictates syncing correctional planning forms (POP) with the individual plan. Legal Gap: The mechanism of using POP specifically as a sub-plan stems strictly from external correctional administrative practice, lacking authorization in § 28. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 34 Finding Reference: PROC-REQ 28.12 Circular/Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret Nature of Procedural Requirement: Dictates a mandatory prerequisite procedure to investigate existing individual plans prior to new planning work. Legal Gap: The requirement uses the highest imperative ("må undersøke") to impose a specific mandatory investigation procedure that is logically implied but not expressly authorized in either § 28 or the regulation. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 35 Finding Reference: PROC-REQ 28.13 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Dictates synthesizing assessments and stating a comprehensive multi-agency offer into a fixed documentary template. Legal Gap: Converts the open statutory outcome standard ("helhetlig tilbud") into a mandated three-part fixed documentation formula ("sammenfatte vurderinger... og angi et helhetlig og begrunnet tjenestetilbud"), removing local procedural discretion. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 29)

Requirement: Avgjørelse om kvalifiseringsprogram med tilhørende stønad er et enkeltvedtak. Source: R-35 para 29 / DOC-REQ-29.1 / section 4.29.1.2. Requirement: Hvis kvalifiseringsprogrammet innvilges, skal varigheten av programmet fremgå av vedtaket. Source: R-35 para 29 / DOC-REQ-29.2 = PROC-REQ-29.5 / section 4.29.1.2. Requirement: skal veileder sammen med søker gå igjennom informasjonen og avgjøre om den kan benyttes som beslutningsgrunnlag. Eventuelle opplysninger som ikke lenger oppfattes som gyldige må endres. Source: R-35 para 29 / PROC-REQ-29.8 (incorporating DOC-REQ-29.3) / section 4.29.2.2. Requirement: I arbeidsevnevurderingen skal en persons ressurser og hindringer, herunder eventuelle helseplager, kartlegges. Source: R-35 para 29 / DOC-REQ-29.4 = PROC-REQ-29.10 / section 4.29.2.9. Requirement: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: veileder-sosialtjenesteloven-17 / DOC-REQ-29.5 = S.4. Requirement: Råd og veiledning gitt i forbindelse med innvilgelse eller avslag av andre sosiale tjenester skal omtales i innvilgelsesvedtaket eller avslaget. Source: veileder-sosialtjenesteloven-17 / DOC-REQ-29.6. Requirement: DOC-REQ-29.7: 'Alle forberedelser, som førstegangssamtale, gjennomføring av arbeidsevnevurdering, utforming av programinnholdet og utarbeidelse av individuell plan, kan utføres mens deltakeren er i fengsel eller forvaring.' S.3: 'For personer som har rett til kvalifiseringsprogram kan tilrettelegging av programmet skje mens personen oppholder seg i fengselet, slik at det kan iverksettes ved løslatelse.'. Source: Nasjonal veileder kriminalomsorgen og Nav / DOC-REQ-29.7 = S.3 / section 4.29.2.13. Requirement: må Nav-kontoret foreta en konkret vurdering av om ny deltakelse i program er hensiktsmessig og nødvendig for å komme i arbeid. Source: R-35 para 29 / PROC-REQ-29.1 / Beginning of paragraph. Requirement: inntektsmuligheter gjennom arbeid og økonomiske rettigheter etter andre ordninger må avklares før vedtak om kvalifiseringsprogram blir fattet. Source: R-35 para 29 / PROC-REQ-29.2 / Beginning of paragraph. Requirement: Nav-kontoret i den nye kommunen bør i samarbeid med deltakeren vurdere om kvalifiseringsprogrammet kan videreføres eller om det er mer hensiktsmessig å innvilge et nytt program. Source: R-35 para 29 / PROC-REQ-29.3 / Beginning of paragraph. Requirement: Dette innebærer blant annet at en søknad skal behandles uten ugrunnet opphold. Source: R-35 para 29 / PROC-REQ-29.4 /

Beginning of paragraph. Requirement: Programmets innhold utarbeides etter at innvilgelsesvedtaket er fattet, og må iverksettes innen seks måneder fra søknadstidspunktet. Source: R-35 para 29 / PROC-REQ-29.6 / Beginning of paragraph. Requirement: I vurderingen av arbeidsevnen skal det tas hensyn til søkers ønsker og ressurser slik de fremkommer i egenvurderingen [...]. Source: R-35 para 29 / PROC-REQ-29.7 / Middle of paragraph. Requirement: Vurderingen av om tett og koordinert bistand er hensiktsmessig og nødvendig skal bygge på opplysningene i arbeidsevnevurderingen og sosialfaglig skjønn, og gjøres av Nav-veileder i samråd med søker. Source: R-35 para 29 / PROC-REQ-29.9 / Middle of paragraph. Requirement: Deltakere som kan ha rett til arbeidsavklaringspenger eller uføretrygd, skal da sette frem krav om det, og det må foretas en konkret vurdering av om det er saklig grunn til å midlertidig avbryte eller avslutte programmet. Source: R-35 para 29 / PROC-REQ-29.11 / End of paragraph. Requirement: Nav-kontoret må foreta en konkret vurdering av om forutsetningene for deltakelse i kvalifiseringsprogram under straffegjennomføring er tilstede i hvert enkelt tilfelle. Source: R-35 para 29 / PROC-REQ-29.12 / End of paragraph. Requirement: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev 2025 / S.1. Requirement: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: Kommunebrev 2025 / S.2.

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the formal administrative classification and legal instrument (enkeltvedtak) that the office must use for its decision. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the specific administrative content regarding duration that must be recorded within the decision letter. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative step-by-step process a caseworker must follow to collaboratively review, validate, and update evidence with the user. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the specific mandatory items (resources, obstacles, health) that must be formally documented within the assessment procedure. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the formal structure and packaging of administrative instruments by forbidding the combination of two specific decisions. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates strict record-keeping rules regarding what must be mentioned in decision documents concerning guidance activities. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates when administrative planning and preparatory procedural steps are allowed to occur. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative action of conducting a concrete evaluation when assessing a user for program re-entry. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the procedural sequencing by demanding external conditions be verified prior to formulating the decision. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the collaborative referral and evaluation process to follow when a participant moves between municipalities. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative timeline and processing speed expected for case handling. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates a strict temporal sequence and a strict six-month deadline for program implementation after a decision is made.

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the assessment procedure by specifying which input (self-assessment) must be weighed. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative methodology for the evaluation, prescribing evidentiary sources, a professional standard, and mandatory co-presence. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review; the requirement dictates an administrative evaluation regarding program termination, but simultaneously mandates a substantive procedural duty on the participant to formally apply for other benefits. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative process of conducting a concrete evaluation tailored to a specific institutional context (incarceration). Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the mandatory sequential order in which different administrative evaluations must be handled. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates an administrative approach for proactive investigation and outreach to identify eligible participants.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: KRAV 1 av 18 Circular/Source: R-35 para 29 / DOC-REQ-29.1 / section 4.29.1.2 Nature of Procedural Requirement: Must format the decision and support concerning the qualification program strictly as an enkeltvedtak. Legal Gap: N/A — specific element is governed by mandatory-closed language in fvl. § 2(b), not permissive language in § 29. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: KRAV 2 av 18 Circular/Source: R-35 para 29 / DOC-REQ-29.2 = PROC-REQ-29.5 / section 4.29.1.2 Nature of Procedural Requirement: Must explicitly record the duration of the program in the decision document when granting the program. Legal Gap: N/A — specific element is governed by mandatory-closed fvl. §§ 24–25 + stl. § 32, no permissive space to shadow-bind. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: KRAV 3 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.8 (incorporating DOC-REQ-29.3) / section 4.29.2.2 Nature of Procedural Requirement: Caseworker must jointly review information with the applicant, formally determine its usability, and mandatorily alter any invalid data. Legal Gap: The circular converts the law's open evidence-discretion into three specific mandatory steps (joint review, usability decision, mandatory updating), eliminating the authority's freedom to determine the assessment scope. Thematic Category: [ASSESS-PROC]

Requirement Reference: 4 Finding Reference: KRAV 4 av 18 Circular/Source: R-35 para 29 / DOC-REQ-29.4 = PROC-REQ-29.10 / section 4.29.2.9 Nature of Procedural Requirement: Must map and record a person's resources, obstacles, and health issues within the work capability assessment. Legal Gap: N/A — specific element is governed by mandatory-closed Nav-loven § 14a, not permissive language in § 29. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: KRAV 5 av 18 Circular/Source: veileder-sosialtjenesteloven-17 / DOC-REQ-29.5 = S.4 Nature of Procedural Requirement: Must issue separate decision instruments for § 17 measures and § 29 programs, and strictly prohibit their consolidation. Legal Gap: The circular converts the law's procedural silence on

decision packaging into a mandatory rule requiring a separate instrument and prohibiting incorporation. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: KRAV 6 av 18 Circular/Source: veileder-sosialtjenesteloven-17 / DOC-REQ-29.6 Nature of Procedural Requirement: Must explicitly mention any guidance given in relation to other social services directly in the decision document. Legal Gap: The circular imposes a mandatory specific content requirement on decisions in the open space where § 29 grants no instruction. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: KRAV 7 av 18 Circular/Source: Nasjonal veileder kriminalomsorgen og Nav / DOC-REQ-29.7 = S.3 / section 4.29.2.13 Nature of Procedural Requirement: May conduct administrative preparations (first meetings, assessments, plan drafting) while the participant is detained or incarcerated. Legal Gap: N/A — circular uses permissive language ('kan') fully consistent with the law's open permissive space; no escalation detected. Thematic Category: [OTHER] Preparatory process.

Requirement Reference: 8 Finding Reference: KRAV 8 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.1 / Beginning of paragraph Nature of Procedural Requirement: Must conduct a specific, concrete evaluation regarding the appropriateness and necessity of a user re-entering the program. Legal Gap: N/A — the circular's requirement for a concrete assessment is substantively equivalent to the law's 'vurderes' condition; no escalation detected. Thematic Category: [ASSESS-PROC]

Requirement Reference: 9 Finding Reference: KRAV 9 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.2 / Beginning of paragraph Nature of Procedural Requirement: Must successfully clarify income and other rights before formulating the KVP decision. Legal Gap: N/A — specifying verification must occur before the decision is inherent to any condition-based right; no escalation detected. Thematic Category: [SEQUENCE]

Requirement Reference: 10 Finding Reference: KRAV 10 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.3 / Beginning of paragraph Nature of Procedural Requirement: Should collaboratively evaluate, when a participant moves, whether to continue their current program or evaluate them for a new one. Legal Gap: N/A — the circular uses recommendation ('bør') which is weaker than the law's mandatory requirement; no escalation detected. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 11 Finding Reference: KRAV 11 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.4 / Beginning of paragraph Nature of Procedural Requirement: Must formally process the application without undue delay. Legal Gap: N/A — specific element is governed by mandatory-closed fvl. § 11a, not permissive language in § 29. Thematic Category: [SEQUENCE]

Requirement Reference: 12 Finding Reference: KRAV 12 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.6 / Beginning of paragraph Nature of Procedural Requirement: Must design program content only after the decision is granted and must execute implementation within six months of application. Legal Gap: The circular converts the law's open timing into a mandatory fixed deadline of 6 months from the application date. Thematic Category: [SEQUENCE]

Requirement Reference: 13 Finding Reference: KRAV 13 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.7 / Middle of paragraph Nature of Procedural Requirement: Must weigh the user's desires and resources exactly as presented in the self-evaluation during the assessment. Legal Gap: N/A — specific element is governed by mandatory-closed Nav-loven § 14a, not by permissive language in § 29. Thematic Category: [ASSESS-PROC]

Requirement Reference: 14 Finding Reference: KRAV 14 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.9 / Middle of paragraph Nature of Procedural Requirement: Must build the evaluation strictly on work assessments and social discretion, collaboratively enacted between a NAV counselor and the user. Legal Gap: The circular converts the law's open evidence-discretion into a three-part mandatory specific methodology dictating evidentiary source, reasoning standard, and fixed actor co-presence. Thematic Category: [ASSESS-PROC]

Requirement Reference: 15 Finding Reference: KRAV 15 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.11 / End of paragraph Nature of Procedural Requirement: Must evaluate if objective grounds exist to interrupt or end the program, and mandates the user submit claims for other benefits. Legal Gap: The circular imposes a mandatory positive obligation on the participant to apply for benefits, converting a passive eligibility criterion into an affirmative procedural duty. Thematic Category: [OTHER] Mixed participant duty and administrative assessment.

Requirement Reference: 16 Finding Reference: KRAV 16 av 18 Circular/Source: R-35 para 29 / PROC-REQ-29.12 / End of paragraph Nature of Procedural Requirement: Must perform an individualized, concrete evaluation of prerequisites while a participant is going through criminal sentencing. Legal Gap: N/A — requirement for a concrete individual assessment mirrors the individualized assessment already mandated by the statute; no escalation detected. Thematic Category: [ASSESS-PROC]

Requirement Reference: 17 Finding Reference: KRAV 17 av 18 Circular/Source: Kommunebrev 2025 / S.1 Nature of Procedural Requirement: Must sequentially process and evaluate the right to a qualification program before imposing activity requirements. Legal Gap: The circular converts the law's open timing into a mandatory specific sequencing obligation. Thematic Category: [SEQUENCE]

Requirement Reference: 18 Finding Reference: KRAV 18 av 18 Circular/Source: Kommunebrev 2025 / S.2 Nature of Procedural Requirement: Should actively conduct outreach to investigate possible eligibility for target populations and offer required application assistance. Legal Gap: N/A — recommendation to proactively investigate does not convert open space into mandatory obligations; no escalation detected. Thematic Category: [USER-COMM]

Step 1 — Extract All Requirements for Process inflation(§ 30)

Requirement 1: Når vedtak om deltakelse i kvalifiseringsprogram er fattet, skal Nav-veileder sammen med deltaker definere mål og utarbeide et individuelt tilpasset program. Source: R-35 § 4.30 — begynnelse (PROC-REQ 30.1).

Requirement 2: Det skal derfor legges stor vekt på deltakerens egne ønsker og vurderinger ved utformingen av programmet. Source: R-35 § 4.30 — begynnelse (PROC-REQ 30.2).

Requirement 3: Nav-kontoret må foreta en konkret og individuell vurdering av hvilken type utdanning eller opplæring som skal inngå. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.3).

Requirement 4: Nav-kontoret må begrunne bruken av tiden i hver sak. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.4 / DOC-REQ 30.4).

Requirement 5: Deler av programmet kan likevel legges til kveld, natt eller helg hvis det vurderes som hensiktsmessig og nødvendig ut fra deltakerens helhetlige situasjon og yrkesmål. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.5).

Requirement 6: Tidspunktet for iverksettelse av program skal fastsettes etter en individuell og konkret vurdering i samarbeid med deltaker. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.6) — Forskrift § 1 cited.

Requirement 7: Programmet må iverksettes innen seks måneder fra søknadsdato. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.7).

Requirement 8: I oppfølgingen av deltakeren skal det foretas en kontinuerlig vurdering av om aktivitetene og tiltakene i programmet er egnet for å fremme vedkommendes mål. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.8) — Forskrift § 1 cited.

Requirement 9: Deltakerens utbytte av tiltakene og progresjonen i programmet skal vurderes og eventuelt følges opp med endringer av innholdet. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.9) — Forskrift § 1 cited.

Requirement 10: Nav-kontoret må foreta en konkret og individuell vurdering av hvilke andre tiltak som kan inngå i programmet. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.10).

Requirement 11: Tidsbruken skal begrunnes og fremgå av saken. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.11 / DOC-REQ 30.7).

Requirement 12: I tillegg må det alltid vurderes om den enkeltes helsesituasjon utløser andre rettigheter til ytelser og oppfølging. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.12).

Requirement 13: Om en deltaker kan kombinere kvalifiseringsprogram med avtjening av samfunnsstraff, må vurderes individuelt i samarbeid med den det gjelder. Source: R-35 § 4.30 — midtre del (PROC-REQ 30.13).

Requirement 14: Ved gjennomført eller avsluttet program skal det utstedes et deltakerbevis. Source: R-35 § 4.30 — avslutning (PROC-REQ 30.14 / DOC-REQ 30.3) — Forskrift § 1 cited.

Requirement 15: Deltakerbeviset skal utformes i samarbeid med deltaker. Source: R-35 § 4.30 — avslutning (PROC-REQ 30.15).

Requirement 16: Hvis programdeltakeren er forelder, skal det ved utformingen av program tas hensyn til familiesituasjonen og eventuelt foretas tilpasninger i forhold til barnets behov. Source: R-35 § 4.30 — avslutning (PROC-REQ 30.16).

Requirement 17: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: Kommunebrev 2025 (linked to § 30 in Dokument B — PROC-REQ 30.17).

Requirement 18: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder sotjl. § 17 (linked to § 30 in Dokument B — PROC-REQ 30.18 / DOC-REQ 30.12).

Requirement 19: For personer som har rett til kvalifiseringsprogram kan tilrettelegging av programmet skje mens personen oppholder seg i fengselet, slik at det kan iverksettes ved løslatelse. Source: Kriminalomsorg veileder (linked to § 30 in Dokument B — PROC-REQ 30.19).

Requirement 20: Det skal fremgå av programmet på hvilke tidspunkt det skal foretas evalueringer. Source: R-35 § 4.30 — begynnelse (DOC-REQ 30.1) — Forskrift § 1 cited.

Requirement 21: Varigheten av kvalifiseringsprogrammet skal framgå av innvilgelsesvedtaket, mens tidspunktet for oppstart skal framgå av programmet. Source: R-35 § 4.30 — midtre del (DOC-REQ 30.5).

Requirement 22: I tillegg skal Nav-veileder og deltaker avtale konkrete tidspunkt for evalueringer, som skal fremgå av programmet. Source: R-35 § 4.30 — midtre del (DOC-REQ 30.6).

Requirement 23: Beviset skal dokumentere hva slags arbeidsrettet kompetanse deltakeren har tilegnet seg i løpet av programmet, og synliggjøre vedkommendes ressurser og progresjon. Source: R-35 § 4.30 — avslutning (DOC-REQ 30.8).

Requirement 24: Deltakerbeviset bør omtale hvilke tiltak og aktiviteter programmet har bestått av, varighet, at programmet har vært på full tid og oppmøte. Source: R-35 § 4.30 — avslutning (DOC-REQ 30.9).

Requirement 25: Hva deltakeren har oppnådd i forhold til målet, tiltak som har ført til endring og hva som eventuelt gjenstår for å komme i arbeid, kan også nevnes. Source: R-35 § 4.30 — avslutning (DOC-REQ 30.10).

Requirement 26: Aktiviteter som helsehjelp, opptrening og egenaktivitet kan omtales hvis det anses hensiktsmessig. Source: R-35 § 4.30 — avslutning (DOC-REQ 30.11).

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes this establishes a specific administrative two-step mechanism (joint goal-definition and program construction).

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding establishes that this rule converts an open normative standard into a mandatory fixed-weighting formula for a specific subjective factor ("wishes and assessments"). *(Noted here, do not proceed to Step 3)*

Requirement 3: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this dictates the method for how the evidence/standard-assessment must be conducted to identify qualifying educational measures.

Requirement 4: [PROCEDURAL/DOCUMENTATION] Justification: The finding classifies this as an absolute mandatory documentation obligation for time use in every case.

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: The finding analyzes this as addressing scheduling arrangements as a structural part of individual program tailoring.

Requirement 6: [PROCEDURAL/DOCUMENTATION] Justification: The finding explains this focuses on how the timing of program commencement is collaboratively assessed and determined.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as an absolute administrative deadline (six months) regarding the timing of when a program must commence.

Requirement 8: [PROCEDURAL/DOCUMENTATION] Justification: The finding explicitly links this to the ongoing monitoring frequency of a mandatory assessment obligation.

Requirement 9: [PROCEDURAL/DOCUMENTATION] Justification: The finding explains this dictates evaluating ongoing progress and the conditional process of adapting program content.

Requirement 10: [PROCEDURAL/DOCUMENTATION] Justification: The finding determines this introduces a mandatory procedural duty to actively assess which supporting measures to include before making a decision.

Requirement 11: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this rule requires a written justification in the case file regarding health activity time allocation.

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: The finding evaluates this as an absolute mandatory administrative duty to assess rights to other benefits and follow-up outside the program.

Requirement 13: [PROCEDURAL/DOCUMENTATION] Justification: The finding confirms this requires an individualized collaborative assessment regarding combination with community service.

Requirement 14: [PROCEDURAL/DOCUMENTATION] Justification: The finding characterizes this as a requirement governing the issuance of an administrative document (deltakerbevis).

Requirement 15: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this dictates the specific procedural form (joint co-creation) by which the certificate must be produced.

Requirement 16: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding states this transforms an open standard into a mandatory enumeration of specific substantive considerations and adaptations (family situation and a third party's child needs) for a specific subgroup. *(Noted here, do not proceed to Step 3)*

Requirement 17: [PROCEDURAL/DOCUMENTATION] Justification: The finding interprets this as an administrative process governing the pre-application eligibility investigation of potential applicants.

Requirement 18: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this governs the procedural vehicle and document format (a separate § 17 decision) rather than a substantive choice.

Requirement 19: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as outlining when and how to begin program preparation within a specific sequence of administrative tailoring.

Requirement 20: [PROCEDURAL/DOCUMENTATION] Justification: The finding concludes this explicitly dictates the documentation content structure of the program plan.

Requirement 21: [PROCEDURAL/DOCUMENTATION] Justification: The finding evaluates this as a rule governing the exact physical locations (across different documents) where specific elements must be recorded.

Requirement 22: [PROCEDURAL/DOCUMENTATION] Justification: The finding specifies this establishes a fixed mandatory two-part procedure combining joint scheduling agreements with strict documentation.

Requirement 23: [PROCEDURAL/DOCUMENTATION] Justification: The finding asserts this dictates mandatory substantive content items that must be placed inside the participant certificate.

Requirement 24: [PROCEDURAL/DOCUMENTATION] Justification: The finding indicates this provides recommendatory guidance on what documentation items should populate the certificate.

Requirement 25: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes this offers permissive guidance on optional documentation content for the certificate.

Requirement 26: [PROCEDURAL/DOCUMENTATION] Justification: The finding explains this consists of permissive guidance regarding the optional documentation of health activities in the certificate.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 **Circular/Source:** R-35 § 4.30 — begynnelse (PROC-REQ 30.1) **Nature of Procedural Requirement:** The Nav caseworker must define goals and draft the program jointly with the participant. **Legal Gap:** § 30 imposes a tailoring obligation but leaves the method open; the circular improperly eliminates methodological freedom by imposing a specific mandatory two-step joint co-creation procedure not derivable from the statute. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.3) **Nature of Procedural Requirement:** The Nav office must conduct a concrete and individual assessment of which educational measures to include. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) grounded in prep works and existing mandatory assessments without language escalation. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.4 / DOC-REQ 30.4) **Nature of Procedural Requirement:** The Nav office must justify and document the allocation of time in every single case. **Legal Gap:** § 30 contains permissive discretion regarding time allocation and lacks a textual basis for an absolute, running obligation to document and justify time usage in every case. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.5) **Nature of Procedural Requirement:** Parts of the program can be scheduled for evenings, nights, or weekends based on a holistic assessment. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) as the conditional scheduling flexibility is consistent with the statutory tailoring obligation. **Thematic Category:** [OTHER] (Procedural scheduling arrangements)

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.6) — Forskrift § 1 cited **Nature of Procedural Requirement:** The start time of the program must be determined through individual assessment in collaboration with the participant. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) deriving directly from the cited delegated authority in Forskrift § 1. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.7) **Nature of Procedural Requirement:** The program must be initiated within six months from the date of application. **Legal Gap:** § 30 concerns program content only and contains absolutely no statutory provision or relevant discretion

element governing a deadline for program commencement. **Thematic Category:** [SEQUENCE]

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 8 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.8) — Forskrift § 1 cited **Nature of Procedural Requirement:** Caseworkers must continuously assess if activities and measures remain suitable for promoting the participant's goals. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) flowing from continuous tailoring obligations and the delegated Forskrift § 1 authority. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.9) — Forskrift § 1 cited **Nature of Procedural Requirement:** Progress and benefit from measures must be evaluated and conditionally followed up with changes to program content. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) under Forskrift § 1 without escalating the statutory framework. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 10 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.10) **Nature of Procedural Requirement:** The Nav office must perform a concrete, individual assessment of which other supportive measures can be included. **Legal Gap:** § 30 grants genuine permissive discretion ('kan') regarding whether to include supporting measures at all, but the circular escalates this by mandating an active, specific assessment procedure must take place first. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.11 / DOC-REQ 30.7) **Nature of Procedural Requirement:** The use of time for health activities must be justified and recorded in the case file. **Legal Gap:** § 30 confers freely exercisable permissive discretion ('kan') regarding health activity time, which the circular improperly converts into a mandatory documentation obligation whenever exercised. **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** REQUIREMENT 12 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.12) **Nature of Procedural Requirement:** The Nav office must always assess if the participant's health situation triggers rights to other benefits and follow-up outside the program. **Legal Gap:** § 30 strictly governs program content/time allocation and provides no statutory basis for this entirely new, absolute mandatory duty ('må alltid') to assess external rights. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 **Circular/Source:** R-35 § 4.30 — midtre del (PROC-REQ 30.13) **Nature of Procedural Requirement:** Any combination of the program with a community service sentence must be assessed individually with the participant. **Legal Gap:** § 30 explicitly and exhaustively lists combination options as strictly employment or apprenticeship; community service is legally distinct and entirely outside the provision's regulatory scope. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** REQUIREMENT 14 **Circular/Source:** R-35 § 4.30 — avslutning (PROC-REQ 30.14 / DOC-REQ 30.3) — Forskrift § 1 cited **Nature**

of Procedural Requirement: A participant certificate must be issued when the program is completed or terminated. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) legitimately derived from the cited Forskrift § 1 under S8 delegation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** REQUIREMENT 15 **Circular/Source:** R-35 § 4.30 — avslutning (PROC-REQ 30.15) **Nature of Procedural Requirement:** The participant certificate must be drafted in collaboration with the participant. **Legal Gap:** § 30 contains no statutory or delegated provision directing the specific procedural form (joint co-creation) by which the certificate must be produced. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** REQUIREMENT 17 **Circular/Source:** Kommunebrev 2025 (linked to § 30 in Dokument B — PROC-REQ 30.17) **Nature of Procedural Requirement:** The Nav office should actively investigate eligible persons in the target group and assist them with applications. **Legal Gap:** § 30 governs content only for already-enrolled participants; this duty addresses pre-application eligibility identification which belongs to entirely different provisions (§ 29 and § 17). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 18 **Finding Reference:** REQUIREMENT 18 **Circular/Source:** Veileder sotjl. § 17 (linked to § 30 in Dokument B — PROC-REQ 30.18 / DOC-REQ 30.12) **Nature of Procedural Requirement:** A § 17 advisory service included as a measure must be formalized in a separate § 17 decision rather than inside the § 29 program decision. **Legal Gap:** The procedural requirement to use a distinct decision derives directly from § 17's own rules and not from § 30, making its linkage to § 30 ambiguous, though the finding notes this does not escalate substantive discretion. **Thematic Category:** [DOC-REQ]

Requirement Reference: 19 **Finding Reference:** REQUIREMENT 19 **Circular/Source:** Kriminalomsorg veileder (linked to § 30 in Dokument B — PROC-REQ 30.19) **Nature of Procedural Requirement:** Program preparation and facilitation can occur while a participant is in prison to allow start upon release. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) utilizing permissive language consistent with general statutory flexibility. **Thematic Category:** [SEQUENCE]

Requirement Reference: 20 **Finding Reference:** REQUIREMENT 20 **Circular/Source:** R-35 § 4.30 — begynnelse (DOC-REQ 30.1) — Forskrift § 1 cited **Nature of Procedural Requirement:** The program document must state the timing schedule for evaluations. **Legal Gap:** No gap established; the finding concludes this requirement has a valid legal basis (HAS_HJEMMEL) appropriately drawn from Forskrift § 1 under S8 delegation. **Thematic Category:** [DOC-REQ]

Requirement Reference: 21 **Finding Reference:** REQUIREMENT 21 **Circular/Source:** R-35 § 4.30 — midtre del (DOC-REQ 30.5) **Nature of Procedural Requirement:** Program duration must appear in the grant decision, while the start date must appear in the program document. **Legal Gap:** § 30 contains no provision dictating exactly where or in which specific documents different mandatory program elements must be recorded. **Thematic Category:** [DOC-REQ]

Requirement Reference: 22 **Finding Reference:** REQUIREMENT 22 **Circular/Source:** R-35 § 4.30 — midtre del (DOC-REQ 30.6) **Nature of Procedural Requirement:** The caseworker and participant must agree on concrete evaluation dates, and these specific dates must be documented in the program. **Legal Gap:** § 30 leaves evaluation structuring open under a tailoring obligation; the circular improperly eliminates municipality flexibility by converting it into a fixed two-part mandatory documentation and agreement procedure without statutory basis. **Thematic Category:** [DOC-REQ]

Requirement Reference: 23 **Finding Reference:** REQUIREMENT 23 **Circular/Source:** R-35 § 4.30 — avslutning (DOC-REQ 30.8) **Nature of Procedural Requirement:** The participant certificate must explicitly document acquired work-related competence, resources, and progression. **Legal Gap:** § 30 and its corresponding delegated regulations contain no specific provisions authorizing a mandatory enumeration of substantive content items for the certificate. **Thematic Category:** [DOC-REQ]

Requirement Reference: 24 **Finding Reference:** REQUIREMENT 24 **Circular/Source:** R-35 § 4.30 — avslutning (DOC-REQ 30.9) **Nature of Procedural Requirement:** The participant certificate should mention measures, activities, duration, full-time status, and attendance. **Legal Gap:** § 30 contains no provision authorizing specification of guided/recommended certificate content, though practical severity is reduced due to 'bør' language. **Thematic Category:** [DOC-REQ]

Requirement Reference: 25 **Finding Reference:** REQUIREMENT 25 **Circular/Source:** R-35 § 4.30 — avslutning (DOC-REQ 30.10) **Nature of Procedural Requirement:** The certificate can optionally mention achievements relative to goals, change-inducing measures, and remaining steps for employment. **Legal Gap:** § 30 lacks any authorization for specifying optional certificate content items, though practical severity is minimal due to permissive 'kan' language. **Thematic Category:** [DOC-REQ]

Requirement Reference: 26 **Finding Reference:** REQUIREMENT 26 **Circular/Source:** R-35 § 4.30 — avslutning (DOC-REQ 30.11) **Nature of Procedural Requirement:** Activities such as health assistance, training, and self-activity can be documented in the certificate if deemed appropriate. **Legal Gap:** § 30 authorizes the allocation of health activities inside the program but contains no provision regarding permissive, retrospective documentation of these activities in the certificate. **Thematic Category:** [DOC-REQ]

Here is the analysis of the Track A deviation finding based on your explicit instructions.

Step 1 — Extract All Requirements for Process inflation(§ 31)

Requirement 1: Kommunen skal tilrettelegge og iverksette kvalifiseringsprogram... men senest innen seks måneder etter at søknad om deltakelse har kommet inn. Source: PROC-REQ-31.1 (R-35, § 31, begynnelse)

Requirement 2: Ved søknad om kvalifiseringsprogram skal det foretas en arbeidsevnevurdering, hvis det ikke allerede er gjort. Source: PROC-REQ-31.2 (R-35, § 31, begynnelse)

Requirement 3: Det må videre vurderes om øvrige inngangsvilkår er oppfylt. Source: PROC-REQ-31.3 (R-35, § 31, begynnelse)

Requirement 4: Hvis kvalifiseringsprogram blir innvilget, skal innholdet i programmet utformes. Source: PROC-REQ-31.4 (R-35, § 31, begynnelse)

Requirement 5: Starttidspunktet skal fastsettes i samråd med deltaker og fremgå av programmet. Source: PROC-REQ-31.5 / DOC-REQ-31.1 (R-35, § 31, midtre del)

Requirement 6: Deltakeren skal ha et program på full tid med et forsvarlig, faglig innhold fra oppstart. Source: PROC-REQ-31.6 (R-35, § 31, midtre del)

Requirement 7: Programmet kan utformes etter hvert, forutsatt at det ikke oppstår perioder uten tiltak og aktiviteter. Source: PROC-REQ-31.7 / DOC-REQ-31.2 (R-35, § 31, midtre del)

Requirement 8: Nav-kontoret skal bidra til gode overganger mellom ulike ordninger, ytelser og livssituasjoner for den enkelte. Source: PROC-REQ-31.8 (R-35, § 31, avslutning)

Requirement 9: For eksempel bør perioden før iverksettelse brukes på en måte som gjør at programmet kan starte umiddelbart etter løslatelse... Source: PROC-REQ-31.9 (R-35, § 31, avslutning)

Requirement 10: Det kan i tillegg være nødvendig å sikre deltakeren stønad til livsopphold fram til iverksettelse og første utbetaling... Source: PROC-REQ-31.10 (R-35, § 31, avslutning)

Requirement 11: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: PROC-REQ-31.11 (Kommunebrev 2025)

Requirement 12: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram... Source: PROC-REQ-31.12 (Kommunebrev 2025)

Requirement 13: For personer som har rett til kvalifiseringsprogram kan tilrettelegging av programmet skje mens personen oppholder seg i fengselet... Source: PROC-REQ-31.13 (Veileder for samarbeid — Kriminalomsorg)

Requirement 14: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: PROC-REQ-31.14 / DOC-REQ-31.3 (Veileder til sotjl. § 17)

Requirement 15: Det skal fattes vedtak om hvilken arbeidsrettet oppfølging vedkommende skal ha utfra behovet, og eventuelt utarbeides en aktivitetsplan, eller et kvalifiseringsprogram for deltakere i programmet. Source: DOC-REQ-31.4 (Veileder til sotjl. § 17)

Step 2 — Classify Each Requirement

Requirement 1 Classification: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The finding explicitly establishes this as a "MANDATORY-CLOSED" element defining the fixed outer time limit and unconditional legal duty to implement the program. *(Note: Do not proceed to Step 3 for this requirement)*

Requirement 2 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The requirement converts the open discretion of how to arrange the program into a mandatory administrative obligation to use a specific procedural assessment tool ("arbeidsevnevurdering").

Requirement 3 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding notes this dictates the administrative step of assessing and verifying that the statutory eligibility conditions are met.

Requirement 4 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding identifies this as the administrative process of giving the program content and form prior to its legal implementation.

Requirement 5 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The requirement dictates a participant consultation process and a strict documentation standard where the date must be recorded in the program.

Requirement 6 Classification: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: The finding states explicitly that the mandates for "full tid" and "forsvarlig faglig innhold" are "substantive programme content requirements, not merely implementation arrangements". *(Note: Do not proceed to Step 3 for this requirement)*

Requirement 7 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding states this encompasses the administrative sequencing of how and when the program's detailed content is developed over time.

Requirement 8 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The finding interprets this as a coordination obligation to facilitate transition processes across different administrative services and situations.

Requirement 9 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The requirement dictates the procedural sequencing and practical steps for how the municipality manages the pre-implementation timeframe.

Requirement 10 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The finding links this to the practical facilitation step of ensuring the participant's financial continuity during the administrative pre-implementation phase.

Requirement 11 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding explicitly states this introduces a mandatory procedural sequencing rule dictating that the eligibility assessment must precede any imposition of activity conditions.

Requirement 12 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The finding indicates this prescribes a proactive eligibility investigation process prior to a formal application being received.

Requirement 13 Classification: **[PROCEDURAL/DOCUMENTATION]** Justification: The finding describes this as covering the procedural allowance of where and when the preparatory steps are administratively organized.

Requirement 14 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The requirement dictates the internal "vedtak architecture" specifying how administrative decisions must be structurally documented and separated.

Requirement 15 Classification: **[PROCEDURAL/DOCUMENTATION]** (Ambiguous — recommend human legal review) Justification: The finding states this dictates the formal administrative decision-making process ("vedtak") regarding work-oriented follow-up prior to program implementation.

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** REQ 2 av 15 **Circular/Source:** PROC-REQ-31.2 (R-35, § 31, begynnelse) **Nature of Procedural Requirement:** A specific assessment instrument (arbeidsevnevurdering) must be used. **Legal Gap:** § 31 authorises implementation for eligible persons but does not prescribe the specific assessment instrument to be used in the eligibility process. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** REQ 3 av 15 **Circular/Source:** PROC-REQ-31.3 (R-35, § 31, begynnelse) **Nature of Procedural Requirement:** Administrative verification that the entry conditions are met. **Legal Gap:** N/A — the duty to verify the eligibility conditions is implicit in § 31's triggering clause; no authority gap exists. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 4 **Finding Reference:** REQ 4 av 15 **Circular/Source:** PROC-REQ-31.4 (R-35, § 31, begynnelse) **Nature of Procedural Requirement:** The

content of the program must be formulated once granted. **Legal Gap:** N/A — organising and forming the program's content is directly encompassed by the statutory duty to "tilrettelegge og iverksette". **Thematic Category:** [SEQUENCE]

Requirement Reference: 5 **Finding Reference:** REQ 5 av 15 **Circular/Source:** PROC-REQ-31.5 / DOC-REQ-31.1 (R-35, § 31, midtre del) **Nature of Procedural Requirement:** The start date must be set in consultation with the participant and recorded directly in the program document. **Legal Gap:** § 31 supports the requirement to document the date but does not authorise the consultation procedure, making the combined requirement's basis ambiguous. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQ 7 av 15 **Circular/Source:** PROC-REQ-31.7 / DOC-REQ-31.2 (R-35, § 31, midtre del) **Nature of Procedural Requirement:** The program content may be developed gradually, provided there are no periods without activities. **Legal Gap:** N/A — graduated development falls within the HOW-discretion, and the condition attached reflects § 30's full-time requirement without introducing novel authority. **Thematic Category:** [SEQUENCE]

Requirement Reference: 8 **Finding Reference:** REQ 8 av 15 **Circular/Source:** PROC-REQ-31.8 (R-35, § 31, avslutning) **Nature of Procedural Requirement:** The NAV office must contribute to inter-agency or cross-scheme transitions for the individual. **Legal Gap:** It is arguable whether broad transition facilitation falls within the scope of "tilrettelegge" in § 31 or requires a separate legal basis, making its basis ambiguous. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 9 **Finding Reference:** REQ 9 av 15 **Circular/Source:** PROC-REQ-31.9 (R-35, § 31, avslutning) **Nature of Procedural Requirement:** The pre-implementation period should be structured so the program can begin immediately after release from prison. **Legal Gap:** N/A — guidance on how to use the pre-implementation period falls squarely within the HOW-discretion and is not a new requirement. **Thematic Category:** [SEQUENCE]

Requirement Reference: 10 **Finding Reference:** REQ 10 av 15 **Circular/Source:** PROC-REQ-31.10 (R-35, § 31, avslutning) **Nature of Procedural Requirement:** Ensuring the participant has practical financial continuity until program implementation. **Legal Gap:** § 31 does not authorise the specific measure of providing income support; it is ambiguous whether this derives from § 31 or is a § 18 requirement contextualised to the § 31 phase. **Thematic Category:** [OTHER] Practical financial facilitation.

Requirement Reference: 11 **Finding Reference:** REQ 11 av 15 **Circular/Source:** PROC-REQ-31.11 (Kommunebrev 2025) **Nature of Procedural Requirement:** The right to the program must be assessed before any conditions regarding activity are imposed. **Legal Gap:** § 31 provides no basis for mandating a priority sequence of § 31 processing relative to other provisions' activity conditions. **Thematic Category:** [SEQUENCE]

Requirement Reference: 12 **Finding Reference:** REQ 12 av 15 **Circular/Source:** PROC-REQ-31.12 (Kommunebrev 2025) **Nature of Procedural Requirement:** Active investigation of potential eligibility for individuals in the target group. **Legal Gap:** § 31 is

triggered strictly by an application and contains no authority for pre-application proactive investigation, making its basis ambiguous. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** REQ 13 av 15 **Circular/Source:** PROC-REQ-31.13 (Veileder for samarbeid — Kriminalomsorg) **Nature of Procedural Requirement:** Preparation and administrative arrangements of the program can occur while the person is physically in prison. **Legal Gap:** N/A — conducting preparatory arrangements while in prison is a specific valid exercise of the open HOW-discretion. **Thematic Category:** [OTHER] Physical location of procedural arrangements.

Requirement Reference: 14 **Finding Reference:** REQ 14 av 15 **Circular/Source:** PROC-REQ-31.14 / DOC-REQ-31.3 (Veileder til sotjl. § 17) **Nature of Procedural Requirement:** Component measures must be documented in a separate decision (vedtak) under § 17, distinct from the § 29 program decision. **Legal Gap:** § 31 authorises program implementation but not the internal "vedtak architecture" for component measures, making the link to § 31 ambiguous. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** REQ 15 av 15 **Circular/Source:** DOC-REQ-31.4 (Veileder til sotjl. § 17) **Nature of Procedural Requirement:** A formal decision (vedtak) on work-oriented follow-up must be made prior to implementation. **Legal Gap:** § 31 authorises program implementation but does not establish the pre-implementation vedtak structure; the actual basis is Nav-loven § 14a, making the link to § 31 ambiguous. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 32)

Requirement: Varigheten fastsettes ut fra deltakerens forutsetninger og behov og skal fremgå av vedtaket. Source: DOC-REQ 32.1 (R-35 Para 32, beginning — Under § 2). Requirement: Ved utløpet av vedtaksperioden skal kommunen fatte vedtak om at programmet forlenges, jf. loven § 32 første ledd første punktum, eller avsluttes, jf. loven § 34 første ledd. Source: DOC-REQ 32.2 (R-35 Para 32, beginning — Under § 2). Requirement: Varigheten skal fastsettes og individuelt begrunnes i vedtaket om innvilget program eller vedtak om forlengelse. Source: DOC-REQ 32.3 = PROC-REQ 32.1 (R-35 Para 32 — Under 4.32.1.1 / beginning). Requirement: Vurderinger knyttet til varigheten av program må være begrunnet i deltakers individuelle forhold. Source: DOC-REQ 32.4 (R-35 Para 32 — Under 4.32.1.1). Requirement: Avgjørelse om å tas inn igjen i program skal også fattes og begrunnes i vedtak som kan påklages til statsforvalteren. Source: DOC-REQ 32.5 = PROC-REQ 32.2 (R-35 Para 32 — Under 4.32.1.1 / when re-entering). Requirement: Hvis kvalifiseringsprogrammet ikke forlenges, skal det fattes vedtak om avslutning etter § 34. Source: DOC-REQ 32.6 = PROC-REQ 32.5 (R-35 Para 32 — Under 4.32.2.2 / end of period). Requirement: Varigheten skal fastsettes individuelt ut fra deltakerens ressurser, hindringer og behov, slik de fremgår av arbeidsevnevurderingen. Source: PROC-REQ 32.3 (R-35 Para 32 — beginning, before decision). Requirement: Deltakeren må fortsatt fylle inngangsvilkårene til program, men det er ikke nødvendig å foreta en ny arbeidsevnevurdering. Source: PROC-REQ 32.4 (R-35 Para 32 — middle, before extension decision). Requirement: Vurderingen av om det er hensiktsmessig å forlenge programmet, gjøres i samarbeid med deltakeren i evalueringen senest før vedtaksperioden utløper. Source: PROC-REQ 32.6 (R-35 Para 32 — middle, latest before expiry). Requirement: I vurderingen skal det legges vekt på deltakerens forutsetninger, oppfølgingsbehov, progresjon i programmet og motivasjon for fortsatt deltakelse. Source: PROC-REQ 32.7 (R-35 Para 32 — middle, during evaluation). Requirement: I tillegg må det vurderes som sannsynlig at målsettingen om overgang til arbeid kan nås som følge av forlengelsen. Source: PROC-REQ 32.8 (R-35 Para 32 — middle, during evaluation). Requirement: Vurderingen av om en ytterligere forlengelse er nødvendig for å kunne oppnå målsettingen om arbeidsdeltakelse, gjøres i samarbeid med deltakeren på slutten av vedtaksperioden. Source: PROC-REQ 32.9 (R-35 Para 32 — end of period, special extension). Requirement: Situasjonen på arbeidsmarkedet skal også vektlegges. Source: PROC-REQ 32.10 (R-35 Para 32 — end, during special extension evaluation). Requirement: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: PROC-REQ 32.11 (Kommunebrev 2025 — before setting conditions). Requirement: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: PROC-REQ 32.12 (Kommunebrev 2025 — proactive discovery). Requirement: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: DOC-REQ 32.7 = PROC-REQ 32.13 (Veileder sotjl. § 17 — when adding advice/guidance measure).

Step 2 — Classify Each Requirement

Requirement 1 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding establishes that this is a documentation requirement stating that whatever duration is set must appear in the written administrative decision.

Requirement 2 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates that the authority must make a formal documented decision at the period's end, without constraining the substantive choice of whether to extend.

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this merely specifies the content of the mandatory reasons required by general administrative law in the formal decision.

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement governs how reasoning must be documented (grounded in individual circumstances) rather than converting open standards into fixed substantive criteria.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This dictates the administrative form of the action (a formal decision that can be appealed to the county governor) rather than a substantive entitlement. *Ambiguous — recommend human legal review* (statutory linkage is disputed).

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding specifies this only concerns the formal procedural step (issuing a termination decision) that must follow if the substantive choice not to extend is made.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The requirement mandates that the process of duration-setting rely on a specific evaluation procedure and document (arbeidsevnevurderingen). *Ambiguous — recommend human legal review* (classification between procedural mandate and substantive constraint).

Requirement 8 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this dictates evidentiary procedure by relieving the authority of the administrative burden to conduct a specific new assessment. *Ambiguous — recommend human legal review* (statutory authorization for this waiver is disputed).

Requirement 9 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding establishes that this converts an open assessment into mandatory procedural constraints regarding collaboration, vehicle, and timing. *Ambiguous — recommend human legal review* (statutory basis for this mandate is disputed).

Requirement 10 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding concludes that this eliminates standard-discretion by mandating four specific substantive weighting criteria that must be applied to determine extension outcomes. *(Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3)*

Requirement 11 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding details how this adds a mandatory probability threshold and predictive criterion to the

substantive decision of whether an extension will be granted. *(Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3)*

Requirement 12 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This replaces the open assessment process with mandatory procedural constraints regarding the method (collaboration) and timing (end of decision period). *Ambiguous — recommend human legal review* (statutory authorization is disputed).

Requirement 13 Classification: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding establishes that this mandates the weighting of a specific substantive factor (labor market conditions), altering the law's open standard for assessing special grounds. *(Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3)*

Requirement 14 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as a procedural sequencing requirement dictating the step-by-step order of assessments.

Requirement 15 Classification: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates a procedural and administrative duty for the Nav-office to proactively investigate eligibility and assist with applications.

Requirement 16 Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as a dictate on the structural separation of administrative decisions (what goes into which type of decision). *Ambiguous — recommend human legal review* (statutory linkage is disputed).

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** KRAV 1 av 16 **Circular/Source:** DOC-REQ 32.1 (R-35 Para 32, beginning — Under § 2) **Nature of Procedural Requirement:** The chosen duration of the program must be explicitly recorded in the administrative decision. **Legal Gap:** No gap identified (HAS_HJEMMEL / OK). The requirement aligns directly with delegated regulations and general administrative law governing decision forms. **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** KRAV 2 av 16 **Circular/Source:** DOC-REQ 32.2 (R-35 Para 32, beginning — Under § 2) **Nature of Procedural Requirement:** The authority must make a formal administrative decision at the end of the period either to extend or terminate the program. **Legal Gap:** No gap identified (HAS_HJEMMEL / OK). It follows general administrative law that rights-affecting choices at the end of a period require formal decisions. **Thematic Category:** [DOC-REQ]

Requirement Reference: 3 **Finding Reference:** KRAV 3 av 16 **Circular/Source:** DOC-REQ 32.3 = PROC-REQ 32.1 (R-35 Para 32 — Under 4.32.1.1 / beginning) **Nature of Procedural Requirement:** The authority must individually justify the chosen duration within the reasoning of the program grant or extension decision. **Legal Gap:** No gap identified

(HAS_HJEMMEL / OK). It is a standard specification of the content of mandatory reasons under the Public Administration Act (fvl. § 25). **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** KRAV 4 av 16 **Circular/Source:** DOC-REQ 32.4 (R-35 Para 32 — Under 4.32.1.1) **Nature of Procedural Requirement:** Evaluative reasoning regarding duration must document its basis in the participant's individual circumstances. **Legal Gap:** No gap identified (HAS_HJEMMEL / OK). It reiterates the individualized nature of the assessment under standard administrative law without overriding discretion. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** KRAV 5 av 16 **Circular/Source:** DOC-REQ 32.5 = PROC-REQ 32.2 (R-35 Para 32 — Under 4.32.1.1 / when re-entering) **Nature of Procedural Requirement:** Re-admission decisions must be formalized in a decision that includes reasons and appeal rights. **Legal Gap:** TVETYDIG (Ambiguous linkage). The statute § 32 is completely silent on re-admission to the program after a break; this procedural requirement is structurally misplaced under § 32. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** KRAV 6 av 16 **Circular/Source:** DOC-REQ 32.6 = PROC-REQ 32.5 (R-35 Para 32 — Under 4.32.2.2 / end of period) **Nature of Procedural Requirement:** If not extending the program, a formal decision regarding its conclusion must be issued under § 34. **Legal Gap:** No gap identified (HAS_HJEMMEL / OK). Direct procedural consequence resulting from the substantive choice not to extend. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** KRAV 7 av 16 **Circular/Source:** PROC-REQ 32.3 (R-35 Para 32 — beginning, before decision) **Nature of Procedural Requirement:** The authority must use the specific "arbeidsevnevurdering" document to assess individual resources, obstacles, and needs when determining duration. **Legal Gap:** SHADOW_BINDING / TVETYDIG. The circular eliminates the authority's open "how-discretion" over duration-setting by mandating a fixed criteria framework permanently anchored to one specific administrative document, lacking clear authorization in § 32. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** KRAV 8 av 16 **Circular/Source:** PROC-REQ 32.4 (R-35 Para 32 — middle, before extension decision) **Nature of Procedural Requirement:** It relieves the authority from having to perform a formally new "arbeidsevnevurdering" when assessing an extension. **Legal Gap:** TVETYDIG. The statutory provision contains no language regarding whether a new assessment tool is formally required or waived, creating ambiguity over the statutory anchor for this procedural simplification. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** KRAV 9 av 16 **Circular/Source:** PROC-REQ 32.6 (R-35 Para 32 — middle, latest before expiry) **Nature of Procedural Requirement:** The authority must conduct its evaluation of the extension collaboratively with the user, strictly before the current decision period expires. **Legal Gap:** SHADOW_BINDING / TVETYDIG. The law’s open evaluation discretion is superseded by three mandatory procedural constraints specifying collaboration modality, process vehicle, and a strict timing deadline. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 12 **Finding Reference:** KRAV 12 av 16 **Circular/Source:** PROC-REQ 32.9 (R-35 Para 32 — end of period, special extension) **Nature of Procedural Requirement:** Assessments for further special extension must be done collaboratively with the participant specifically at the end of the decision period. **Legal Gap:** SHADOW_BINDING / TVETYDIG. The law leaves the evaluation procedure entirely open, but the circular imposes mandatory procedural constraints governing timing and collaborative methods. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** KRAV 14 av 16 **Circular/Source:** PROC-REQ 32.11 (Kommunebrev 2025 — before setting conditions) **Nature of Procedural Requirement:** The right to the qualification program must be procedurally assessed before stipulating any activity conditions. **Legal Gap:** MANGLER_HJEMMEL. This step-by-step sequencing requirement has no statutory basis in § 32, which strictly addresses program duration; it is functionally misplaced. **Thematic Category:** [SEQUENCE]

Requirement Reference: 15 **Finding Reference:** KRAV 15 av 16 **Circular/Source:** PROC-REQ 32.12 (Kommunebrev 2025 — proactive discovery) **Nature of Procedural Requirement:** The Nav-office must actively investigate and search out target group persons who might have rights to the program and assist them in applying. **Legal Gap:** MANGLER_HJEMMEL. Proactive pre-program identification duties fall outside the legal scope of § 32 entirely, which only regulates the timeframe of an ongoing program. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 16 **Finding Reference:** KRAV 16 av 16 **Circular/Source:** DOC-REQ 32.7 = PROC-REQ 32.13 (Veileder sotjl. § 17 — when adding advice/guidance measure) **Nature of Procedural Requirement:** A service measure under § 17 must be structurally separated into its own decision and cannot be nested within the qualification program decision under § 29. **Legal Gap:** TVETYDIG (Ambiguous linkage). This requirement concerning structural separation of administrative decisions is outside the discretionary scope and text of § 32. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 33)

Requirement 1: Planen skal utformes i samarbeid med deltakeren, jf. § 42. Source: Rundskriv 35 § 33 / PROC-REQ-33.1 / DOC-REQ-33.1. **Requirement 2:** En person skal ha kun én individuell plan og én koordinator for planen. Source: Rundskriv 35 § 33 / DOC-REQ-33.2. **Requirement 3:** Hvis deltaker allerede har en individuell plan ved oppstart i program, må Nav-veileder ta kontakt med koordinatoren. Source: Rundskriv 35 § 33 / PROC-REQ-33.2. **Requirement 4:** og sørge for at Nav-kontoret blir en aktør inn i planen og at kvalifiseringsprogrammet samkjøres med planens øvrige tiltak og tjenester. Source: Rundskriv 35 § 33 / PROC-REQ-33.3. **Requirement 5:** Brukere som har behov for langvarige og koordinert tjenester har rett til individuell plan, og både innvilgelser og avslag fattes i vedtak. Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ-33.4. **Requirement 6:** En individuell plan skal sammenfatte vurderinger av behov og virkemidler, og angi et helhetlig og begrunnet tjenestetilbud på tvers av de offentlige instansene som deltar med tiltak og tjenester i planen. Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ-33.5 /

PROC-REQ-33.9. **Requirement 7:** En IP skal blant annet inneholde en angivelse av hvem som har ansvar for å utarbeide planen og hvem som har ansvar for å sikre koordinering og fremdrift i arbeidet med planen jf. Forskrift om individuell plan ved ytelse av velferdstjenester. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav / DOC-REQ-33.6. **Requirement 8:** Kriminalomsorgens planarbeid bør samstemmes med den individuelle planen og POP kan inngå som en delplan under den individuelle planen. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav / DOC-REQ-33.7 / PROC-REQ-33.11. **Requirement 9:** Både barnevernstjenesten og Nav-kontoret har plikt til å utarbeide individuell plan til personer som har behov for langvarige og koordinerte tjenester, jf. barnevernsloven § 15-9, Nav-loven § 15 og sosialtjenesteloven § 28. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / DOC-REQ-33.8 / PROC-REQ-33.6. **Requirement 10:** Individuell plan skal ikke utarbeides uten at det foreligger samtykke. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / DOC-REQ-33.9 / PROC-REQ-33.5. **Requirement 11:** Kommunen bør være oppmerksom på at innsatte ofte har behov for koordinerte og samordnede tjenester under og etter straffegjennomføringen, og at individuell plan kan benyttes i større grad for denne gruppen. Source: Kommunebrev 2025 / PROC-REQ-33.4. **Requirement 12:** Både barnevernstjenesten og Nav-kontoret må undersøke om det allerede foreligger en individuell plan og eventuelt være en bidragsyter i denne. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / PROC-REQ-33.7. **Requirement 13:** Kommunen har en plikt til å bestemme hvilken kommunal tjenesteyter som skal ivareta samordningen dersom dette er uklart. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / PROC-REQ-33.8. **Requirement 14:** Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sosialtjenesteloven § 17 / PROC-REQ-33.10. **Requirement 15:** Hvis brukeren har behov for langvarige og koordinerte tjenester, bør bolig og nødvendige tjenester for å sikre en trygg og god bosituasjon være en del av individuell plan. Source: Veiviser for midlertidig botilbud / PROC-REQ-33.12.

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement dictates the collaborative administrative method for organizing the preparation of the plan.

Requirement 2: [PROCEDURAL/DOCUMENTATION] The requirement establishes the strict administrative structure and record-keeping bounds of having only one plan and one coordinator.

Requirement 3: [PROCEDURAL/DOCUMENTATION] The requirement imposes a mandatory sequential communication step that a specific caseworker must execute.

Requirement 4: [PROCEDURAL/DOCUMENTATION] The requirement mandates specific procedural outcomes concerning how NAV is documented as an actor and how services are administratively aligned.

Requirement 5: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) The requirement mixes a substantive legal threshold for eligibility with a strict procedural documentation mandate for formalizing decisions.

Requirement 6: [PROCEDURAL/DOCUMENTATION] The requirement explicitly dictates the documented contents, evaluations, and format to be included in the individual plan.

Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement dictates the necessary administrative documentation of roles and inter-agency responsibilities within the physical plan document.

Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement suggests a procedure for the structural alignment and inter-agency coordination of separate administrative plans.

Requirement 9: [SUBSTANTIVE LEGAL OBLIGATION] The requirement defines the legal threshold and substantive condition (a needs assessment) that triggers the statutory duty to provide an individual plan. *(Noted here, do not proceed to Step 3)*

Requirement 10: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) The requirement creates an absolute procedural precondition by requiring consent before the administrative step of plan preparation can begin.

Requirement 11: [PROCEDURAL/DOCUMENTATION] The requirement advises caseworkers on internal evaluation procedures and considerations when assessing a specific demographic group.

Requirement 12: [PROCEDURAL/DOCUMENTATION] The requirement dictates a mandatory preliminary investigative sequence the caseworker must perform before proceeding.

Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement imposes an internal administrative procedure and duty to definitively assign inter-agency coordination responsibility.

Requirement 14: [PROCEDURAL/DOCUMENTATION] The requirement dictates exactly how a service decision must be formally documented and administratively separated from other decisions.

Requirement 15: [SUBSTANTIVE LEGAL OBLIGATION] The requirement defines the substantive legal content and specific services (housing) that should constitute a holistic offering. *(Noted here, do not proceed to Step 3)*

Step 3 — Structured Entry

Requirement 1

- **Requirement Reference:** 1

- **Finding Reference:** REQUIREMENT R1
- **Circular/Source:** Rundskriv 35 § 33 / PROC-REQ-33.1 / DOC-REQ-33.1
- **Nature of Procedural Requirement:** The plan must be formulated collaboratively with the participant.
- **Legal Gap:** N/A — the circular text is word-for-word identical to the statutory text, meaning no legal gap exists.
- **Thematic Category:** [USER-COMM]

Requirement 2

- **Requirement Reference:** 2
- **Finding Reference:** REQUIREMENT R2
- **Circular/Source:** Rundskriv 35 § 33 / DOC-REQ-33.2
- **Nature of Procedural Requirement:** A person must have only one individual plan and one plan coordinator.
- **Legal Gap:** N/A — the requirement restates a binding rule from the *Forskrift om individuell plan*, lawfully issued under explicit statutory delegation.
- **Thematic Category:** [DOC-REQ]

Requirement 3

- **Requirement Reference:** 3
- **Finding Reference:** REQUIREMENT R3
- **Circular/Source:** Rundskriv 35 § 33 / PROC-REQ-33.2
- **Nature of Procedural Requirement:** The NAV caseworker must contact the existing coordinator upon the participant's start in the program.
- **Legal Gap:** The law grants open discretion on how to cooperate, but the circular closes off this freedom by imposing a specific, mandatory action triggered by a specific condition and designating a specific actor.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 4

- **Requirement Reference:** 4
- **Finding Reference:** REQUIREMENT R4
- **Circular/Source:** Rundskriv 35 § 33 / PROC-REQ-33.3
- **Nature of Procedural Requirement:** NAV must ensure it is registered as an actor in the plan and align the qualification program with the plan's other measures.
- **Legal Gap:** The open normative standard for a "holistic offering" is replaced with fixed, mandatory content outcomes that eliminate the authority's freedom to interpret what holistic coordination concretely entails.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 5

- **Requirement Reference:** 5
- **Finding Reference:** REQUIREMENT R5
- **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-33.4

- **Nature of Procedural Requirement:** Individual plan approvals and rejections must be decided as formal "vedtak", and the right is conditioned on a need for long-term and coordinated services.
- **Legal Gap:** While the "vedtak" requirement is authorized by general administrative law, conditioning the § 33 plan right on a needs assessment creates a gap by potentially importing a condition that the law expressly excludes.
- **Thematic Category:** [DOC-REQ]

Requirement 6

- **Requirement Reference:** 6
- **Finding Reference:** REQUIREMENT R6
- **Circular/Source:** Veileder til sosialtjenesteloven § 17 / DOC-REQ-33.5 / PROC-REQ-33.9
- **Nature of Procedural Requirement:** The plan must summarize needs and means assessments and indicate a holistic, reasoned service offering across participating agencies.
- **Legal Gap:** The open normative term "helhetlig tilbud" is replaced by fixed, enumerated documentation mandates without citing the authorizing regulation, eliminating case-by-case interpretive freedom.
- **Thematic Category:** [DOC-REQ]

Requirement 7

- **Requirement Reference:** 7
- **Finding Reference:** REQUIREMENT R7
- **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav / DOC-REQ-33.6
- **Nature of Procedural Requirement:** The plan must document who is responsible for preparing the plan and who ensures coordination and progress.
- **Legal Gap:** N/A — the circular restates a rule from the *Forskrift om individuell plan*, which was lawfully issued under explicit statutory delegation.
- **Thematic Category:** [DOC-REQ]

Requirement 8

- **Requirement Reference:** 8
- **Finding Reference:** REQUIREMENT R8
- **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav / DOC-REQ-33.7 / PROC-REQ-33.11
- **Nature of Procedural Requirement:** The correctional service's plans should be structurally aligned with the individual plan, and the POP can be included as a sub-plan.
- **Legal Gap:** While the statute does not explicitly mention the correctional services, the circular uses permissive/weaker language ("bør/kan") than the statutory mandate ("skal"), meaning there is no escalation beyond the statutory bounds.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 10

- **Requirement Reference:** 10
- **Finding Reference:** REQUIREMENT R10
- **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / DOC-REQ-33.9 / PROC-REQ-33.5
- **Nature of Procedural Requirement:** An individual plan must not be prepared without the participant's consent.
- **Legal Gap:** The law mandates open collaboration, but the circular converts this into an absolute prohibition and fixed barrier (consent) before preparation can begin, eliminating interpretation.
- **Thematic Category:** [SEQUENCE]

Requirement 11

- **Requirement Reference:** 11
- **Finding Reference:** REQUIREMENT R11
- **Circular/Source:** Kommunebrev 2025 / PROC-REQ-33.4
- **Nature of Procedural Requirement:** The municipality should be aware that inmates often need coordinated services and may utilize the individual plan more for this specific group.
- **Legal Gap:** N/A — the requirement operates as a non-binding awareness recommendation using permissive language, falling within the general cooperation duty without escalating it.
- **Thematic Category:** [ASSESS-PROC]

Requirement 12

- **Requirement Reference:** 12
- **Finding Reference:** REQUIREMENT R12
- **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / PROC-REQ-33.7
- **Nature of Procedural Requirement:** Child welfare services and NAV must initially investigate whether an individual plan already exists and potentially contribute to it.
- **Legal Gap:** The law's open discretion on how to execute cooperation is closed off by imposing a specific, mandatory initial investigative step, removing the authority's freedom to govern the process.
- **Thematic Category:** [SEQUENCE]

Requirement 13

- **Requirement Reference:** 13
- **Finding Reference:** REQUIREMENT R13
- **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / PROC-REQ-33.8
- **Nature of Procedural Requirement:** The municipality must designate which municipal service provider will handle coordination if responsibility is unclear.
- **Legal Gap:** The open cooperation norm is converted into a specific, mandatory decision-making obligation triggered by a defined condition, replacing interpretative latitude with a fixed procedural step.
- **Thematic Category:** [REFERRAL-COORD]

Requirement 14

- **Requirement Reference:** 14
- **Finding Reference:** REQUIREMENT R14
- **Circular/Source:** Veileder til sosialtjenesteloven § 17 / PROC-REQ-33.10
- **Nature of Procedural Requirement:** The service as a measure must be adopted in a separate decision under § 17 and not included in the qualification program decision under § 29.
- **Legal Gap:** The requirement entirely lacks legal basis (hjemmel) under § 33, because § 33 strictly governs individual plan formulation and contains no provision concerning the formalization of these specific service decisions.
- **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 34)

Requirement 1: Nav-kontoret må foreta en konkret vurdering av om det er grunnlag for enten å midlertidig avbryte eller avslutte. Source: PROC-REQ-34.1 / R-35 Para 34, Beginning. **Requirement 2:** Avgjørelse om å midlertidig avbryte eller avslutte kvalifiseringsprogram med tilhørende stønad er enkeltvedtak, som kan påklages til statsforvalteren. Source: DOC-REQ-34.2 / R-35 Para 34, Beginning of section 4.34.1.1. **Requirement 3:** Ved midlertidig avbrudd eller avslutning etter denne bestemmelsen skal utbetaling av kvalifiseringsstønad stanses. Source: PROC-REQ-34.2 / R-35 Para 34, Beginning. **Requirement 4:** Hvis kvalifiseringsprogrammet avsluttes skal det utstedes et deltakerbevis, med mindre deltakeren ikke har kommet i gang med programmet før det avsluttes. Source: PROC-REQ-34.3 / DOC-REQ-34.1 / R-35 Para 34. **Requirement 5:** Som hovedregel skal forhåndsvarsel gis skriftlig. Source: PROC-REQ-34.4 / DOC-REQ-34.3 / R-35 Para 34, Middle of section 4.34.1.1. **Requirement 6:** Nav-kontoret må vurdere om inngangsvilkårene fortsatt er oppfylt og om målet om arbeid er oppnåelig innenfor den tiden som gjenstår. Source: PROC-REQ-34.5 / R-35 Para 34, Middle. **Requirement 7:** Avgjørelse om å tas inn igjen i program skal også fattes og begrunnes i vedtak som kan påklages til statsforvalteren. Source: PROC-REQ-34.6 / DOC-REQ-34.4 / R-35 Para 34, Middle of section 4.34.1.1. **Requirement 8:** Hva som er en saklig grunn må vurderes i hvert enkelt tilfelle. Source: PROC-REQ-34.7 / R-35 Para 34, Middle. **Requirement 9:** Hvis deltaker har hatt gjentatte midlertidige avbrudd, må det avklares om forutsetningene for videre deltakelse fortsatt er tilstede eller om det er saklig grunn for å avslutte programmet. Source: PROC-REQ-34.8 / R-35 Para 34, Middle. **Requirement 10:** Hvis programmet har vært midlertidig avbrutt i ett år skal Nav-kontoret fatte vedtak om å avslutte programmet. Source:

PROC-REQ-34.9 / DOC-REQ-34.5 / R-35 Para 34, End of section 4.34.2. **Requirement 11:** Nav-kontoret må legge til rette for at deltakere skal kunne prøve seg i ordinært arbeid. Source: PROC-REQ-34.10 / R-35 Para 34, End. **Requirement 12:** Hvis en deltaker skal gjennomføre straff må det avklares om straffegjennomføringen kan kombineres med fortsatt deltakelse i programmet, eller om det er saklig grunn til å midlertidig avbryte eller avslutte programmet. Source: PROC-REQ-34.11 / R-35 Para 34, End. **Requirement 13:** Hvis deltakeren setter frem krav om arbeidsavklaringspenger, uføretrygd eller overgangsstønad, må det foretas en konkret vurdering av om det er saklig grunn til å midlertidig avbryte eller avslutte programmet. Source: PROC-REQ-34.12 / R-35 Para 34, End. **Requirement 14:** ...bør Nav-kontorene i de berørte kommunene samarbeide om å tilrettelegge for at flyttingen ikke får uheldige konsekvenser for deltakeren. Source: PROC-REQ-34.13 / R-35 Para 34, End. **Requirement 15:** Nav-kontoret i den ny kommunen bør i samarbeid med deltakeren vurdere om kvalifiseringsprogrammet kan videreføres eller om det er mer hensiktsmessig å innvilge et nytt program. Source: PROC-REQ-34.14 / R-35 Para 34, End. **Requirement 16:** Hvis deltakeren har omfattende fravær må det vurderes om fraværet lar seg forene med fortsatt deltakelse, eller om det er saklig grunn til å midlertidig avbryte eller avslutte programmet. Source: PROC-REQ-34.15 / R-35 Para 34, End. **Requirement 17:** Hvis kvalifiseringsprogrammet stanses, skal opplysning, råd og veiledningstjenesten fortsette i samsvar med § 17-vedtaket eller stanses på selvstendig grunnlag. Source: PROC-REQ-34.16 / DOC-REQ-34.6 / Veileder til sosialtjenesteloven § 17.

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative process of making a concrete investigation before taking action.

Requirement 2: [PROCEDURAL/DOCUMENTATION] The requirement legally classifies the formal nature and documentation of the decision as an enkeltvedtak.

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] The requirement mandates a strict substantive consequence (automatic cessation of payments) following an interruption or termination decision. *(Noted here, do not proceed to Step 3)*

Requirement 4: [PROCEDURAL/DOCUMENTATION] The requirement dictates a post-decision administrative process regarding the physical issuance of a participant certificate.

Requirement 5: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural form of communication by mandating that advance notice must generally be given in writing.

Requirement 6: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement governs the assessment procedure prior to readmission, but it converts open discretion into a conditional assessment with specific, fixed criteria that shadow-bind substantive choices.

Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative form and documentation of readmission decisions, stating they must be single individual decisions.

Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement affirms the administrative necessity of assessing what constitutes a factual reason on a case-by-case basis.

Requirement 9: [PROCEDURAL/DOCUMENTATION] The requirement dictates a procedural investigation duty triggered when the factual circumstances of repeated temporary interruptions arise.

Requirement 10: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes a mandatory-closed legal threshold, dictating the absolute substantive outcome of terminating the program after exactly one year. *(Noted here, do not proceed to Step 3)*

Requirement 11: [SUBSTANTIVE LEGAL OBLIGATION] The requirement creates a positive operational substantive duty for the municipality to actively facilitate work tryouts for the participant. *(Noted here, do not proceed to Step 3)*

Requirement 12: [PROCEDURAL/DOCUMENTATION] The requirement mandates an investigative administrative step to clarify facts when a participant faces execution of a criminal sentence.

Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement dictates an investigative procedure and concrete assessment when a participant makes specific benefit claims.

Requirement 14: [PROCEDURAL/DOCUMENTATION] The requirement recommends an inter-agency collaborative procedure between municipalities upon a participant's relocation.

Requirement 15: [PROCEDURAL/DOCUMENTATION] The requirement dictates a procedural evaluation step in the receiving municipality in collaboration with the participant regarding program continuation.

Requirement 16: [PROCEDURAL/DOCUMENTATION] The requirement mandates an administrative investigation procedure to evaluate whether extensive absence is compatible with continued participation.

Requirement 17: [SUBSTANTIVE LEGAL OBLIGATION] The requirement dictates the substantive legal outcome for separately granted § 17 services in the event the qualification program is stopped. *(Noted here, do not proceed to Step 3)*

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** Requirement 1 of 17 **Circular/Source:** PROC-REQ-34.1 / R-35 Para 34, Beginning **Nature of Procedural Requirement:** Must conduct a concrete assessment of whether there are valid grounds to temporarily interrupt or

terminate the program. **Legal Gap:** No gap exists; the requirement formalizes an investigation process already embedded in the legal standard and general administrative law without escalating the law. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 2 **Finding Reference:** Requirement 2 of 17 **Circular/Source:** DOC-REQ-34.2 / R-35 Para 34, Beginning of section 4.34.1.1 **Nature of Procedural Requirement:** Decisions to temporarily interrupt or terminate must be formulated as 'enkeltvedtak' subject to appeal to the state administrator. **Legal Gap:** No gap exists; the classification of these decisions as individual decisions is anchored in the preparatory works and forvaltningsloven § 2. **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** Requirement 4 of 17 **Circular/Source:** PROC-REQ-34.3 / DOC-REQ-34.1 / R-35 Para 34 **Nature of Procedural Requirement:** Must issue a participant certificate if the qualification program is terminated. **Legal Gap:** § 34 makes no mention of certificates and provides no authority for the obligation; its placement here is legally ambiguous because the requirement genuinely derives from § 30. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** Requirement 5 of 17 **Circular/Source:** PROC-REQ-34.4 / DOC-REQ-34.3 / R-35 Para 34, Middle of section 4.34.1.1 **Nature of Procedural Requirement:** Must generally provide advance notice in a written format. **Legal Gap:** No gap exists; specifying a written format is a reasonable elaboration of the duty to provide advance notice inherently supported by forvaltningsloven § 16. **Thematic Category:** [USER-COMM]

Requirement Reference: 6 **Finding Reference:** Requirement 6 of 17 **Circular/Source:** PROC-REQ-34.5 / R-35 Para 34, Middle **Nature of Procedural Requirement:** Must evaluate if entry conditions are still met and if the work goal is achievable within the remaining time prior to readmission. **Legal Gap:** The statute grants open discretion to resume a program and prescribes no conditions for readmission, but the circular introduces conditional mandatory assessment elements with specific, fixed criteria, resulting in shadow-binding. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** Requirement 7 of 17 **Circular/Source:** PROC-REQ-34.6 / DOC-REQ-34.4 / R-35 Para 34, Middle of section 4.34.1.1 **Nature of Procedural Requirement:** Decisions concerning readmission into the program must be formulated and reasoned as single individual decisions ('enkeltvedtak'). **Legal Gap:** No gap exists; general administrative law, specifically forvaltningsloven § 2(1)(b), clearly provides authority for the procedural form of this decision. **Thematic Category:** [DOC-REQ]

Requirement Reference: 8 **Finding Reference:** Requirement 8 of 17 **Circular/Source:** PROC-REQ-34.7 / R-35 Para 34, Middle **Nature of Procedural Requirement:** Must evaluate what constitutes a valid factual reason ('saklig grunn') in each specific, individual case. **Legal Gap:** No gap exists; affirming an open, case-by-case assessment faithfully articulates exactly what the open normative legal standard inherently demands. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** Requirement 9 of 17 **Circular/Source:** PROC-REQ-34.8 / R-35 Para 34, Middle **Nature of Procedural Requirement:** Must clarify

whether conditions for further participation are met or if there is factual grounds to terminate when a participant has experienced repeated temporary interruptions. **Legal Gap:** No gap exists; it is a procedural investigation duty that directly implements guidance from preparatory works and aligns with the general 'utredningsplikt'. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 12 **Finding Reference:** Requirement 12 of 17 **Circular/Source:** PROC-REQ-34.11 / R-35 Para 34, End **Nature of Procedural Requirement:** Must investigate if a participant's execution of a criminal sentence can be combined with continued participation or constitutes grounds for program interruption/termination. **Legal Gap:** No gap exists; investigating this factual scenario is within the ambit of the open normative standard in § 34, and is legally supported by the general investigation duty in forvaltningsloven § 17. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** Requirement 13 of 17 **Circular/Source:** PROC-REQ-34.12 / R-35 Para 34, End **Nature of Procedural Requirement:** Must conduct a concrete evaluation of grounds to interrupt or terminate the program when a participant asserts specific claims for benefits like AAP, disability, or transitional support. **Legal Gap:** No gap exists; the requirement faithfully implements explicit preparatory works guidance under the 'saklig begrunnet' standard and general administrative law without mandating a substantive outcome. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** Requirement 14 of 17 **Circular/Source:** PROC-REQ-34.13 / R-35 Para 34, End **Nature of Procedural Requirement:** NAV offices in affected municipalities should collaborate to facilitate a move so that the relocation does not create adverse consequences for the participant. **Legal Gap:** The obligation to cooperate across municipal lines during a relocation is entirely unanchored in § 34, making the statutory basis for this requirement legally ambiguous. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 15 **Finding Reference:** Requirement 15 of 17 **Circular/Source:** PROC-REQ-34.14 / R-35 Para 34, End **Nature of Procedural Requirement:** The new municipality's NAV office should cooperatively assess with the participant whether the program can be continued or if a newly granted program is better. **Legal Gap:** § 34 addresses interruption and termination but is completely silent on program continuation in a new municipality, making its placement ambiguous as authority actually stems from §§ 29–30. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 16 **Finding Reference:** Requirement 16 of 17 **Circular/Source:** PROC-REQ-34.15 / R-35 Para 34, End **Nature of Procedural Requirement:** Must investigate whether extensive participant absence is compatible with continued participation or provides factual grounds for interruption or termination. **Legal Gap:** No gap exists; this is an administrative assessment requirement that successfully executes preparatory works guidance and the investigation duty required by forvaltningsloven § 17. **Thematic Category:** [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 35)

Requirement 1: Kvalifiseringsstønaden, eventuelt med barnetillegget, innvilges i samme vedtak som kvalifiseringsprogrammet. Source: R-35 Para 4.35.1.1 (DOC-REQ-35.1)

Requirement 2: I vedtaket skal det informeres om at stønaden kan reduseres på grunn av ugyldig fravær eller samordning med arbeidsinntekt mv. eller andre offentlige ytelser. Source: R-35 Para 4.35.1.1 (DOC-REQ-35.2 = PROC-REQ-35.2)

Requirement 3: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-35.3 = PROC-REQ-35.7)

Requirement 4: Hvis brukeren får opplysning, råd og veiledning i forbindelse med innvilgelse eller avslag av en annen tjeneste i sosialtjenesteloven, skal det i vedtaket som fattes om denne tjenesten fremgå hva som er gitt av opplysning, råd og veiledning. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-35.4)

Requirement 5: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste — en veileder for deg som jobber i NAV (DOC-REQ-35.5)

Requirement 6: Nav-kontoret må følge de krav til saksbehandling som følger av denne loven, forvaltningsloven og uskrevne normer om god forvaltningsskikk. Source: R-35 Para 4.35 (PROC-REQ-35.1)

Requirement 7: Det skal ikke gis barnetillegg for ektefelles eller samboers særkullsbarn. Source: R-35 Para 4.35 (PROC-REQ-35.3)

Requirement 8: Betingelsen om at deltakeren må ha forsørget fosterbarnet i to år forut for krav om barnetillegg, kan fravikes hvis forsørgelsen er av varig karakter. Source: R-35 Para 4.35 (PROC-REQ-35.4)

Requirement 9: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: Kommunebrev 2025 (PROC-REQ-35.5)

Requirement 10: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev 2025 (PROC-REQ-35.6)

Step 2 — Classify Each Requirement

Requirement 1: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement dictates administrative form by mandating that the benefit and the qualification program be consolidated into a single decision document.

Requirement 2: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement dictates the administrative content of a form by stipulating the specific forward-looking information warnings that must be included in the decision document.

Requirement 3: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement governs administrative structure by commanding that the service as a measure must be recorded in a separate decision document.

Requirement 4: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement imposes a record-keeping duty dictating how advice and guidance provided to a user must be documented within a service decision.

Requirement 5: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement mandates the specific documentation of a "barnets beste" assessment so that evaluations can be verified by others.

Requirement 6: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement outlines the broad administrative and procedural standards (the Public Administration Act and unwritten norms) caseworkers must follow in case processing.

Requirement 7: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: This requirement establishes a categorical legal outcome by excluding a specific group (spouse's or partner's stepchildren) from the right to receive the child supplement. *(Noted here, do not proceed to Step 3)*

Requirement 8: **[SUBSTANTIVE LEGAL OBLIGATION]** Justification: This requirement defines the legal threshold for the child supplement by establishing a substantive discretionary waiver condition for foster children. *(Noted here, do not proceed to Step 3)*

Requirement 9: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement dictates the administrative process by mandating active pre-application investigation and assistance for potential program users.

Requirement 10: **[PROCEDURAL/DOCUMENTATION]** Justification: This requirement mandates an administrative procedural sequence, specifying that qualification program eligibility must be assessed before setting activity conditions.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 of 10 **Circular/Source:** R-35 Para 4.35.1.1 (DOC-REQ-35.1) **Nature of Procedural Requirement:** The caseworker must grant the qualification benefit and any potential child supplement in the same decision document as the qualification program. **Legal Gap:** § 35 is entirely silent on decision structure and contains no legal authority mandating the consolidation of these items into a single document. **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 of 10 **Circular/Source:** R-35 Para 4.35.1.1 (DOC-REQ-35.2 = PROC-REQ-35.2) **Nature of Procedural Requirement:** The caseworker must include information in the decision informing the user that the benefit may be reduced in the future due to invalid absence, income coordination, or other public benefits. **Legal Gap:** § 35 contains no provision specifying information content obligations regarding future reductions; the substantive rules on reduction are found in §§ 36–38, not § 35. **Thematic Category:** [USER-COMM]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 of 10 **Circular/Source:** Veileder til sosialtjenesteloven § 17 (DOC-REQ-35.3 = PROC-REQ-35.7) **Nature of Procedural Requirement:** The administrative decision regarding the service as a measure must be issued in its own separate document and not grouped with the qualification program decision. **Legal Gap:** § 35 contains no provision on the form or separation of administrative decisions; the circular attempts to base this requirement under § 35 despite its actual statutory basis lying in §§ 17 and 29. **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 of 10 **Circular/Source:** Veileder til sosialtjenesteloven § 17 (DOC-REQ-35.4) **Nature of Procedural Requirement:** Caseworkers must document what advice and guidance was given to a user inside the decision document issued for a separate social service. **Legal Gap:** § 35 lacks any statutory anchor or provision dictating the documentation of advice and guidance given in connection with service decisions; it is presented without authorizing text. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 of 10 **Circular/Source:** Barnets beste — en veileder for deg som jobber i NAV (DOC-REQ-35.5) **Nature of Procedural Requirement:** Caseworkers must specifically document their "barnets beste" (best interests of the child) assessments to allow for secondary verification of their evaluations. **Legal Gap:** § 35 grants open evidence-discretion regarding the factual assessment of "forsørger barn" but does not mandate or authorize a specific structured assessment model or documentation framework like "barnets beste". **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 of 10 **Circular/Source:** R-35 Para 4.35 (PROC-REQ-35.1) **Nature of Procedural Requirement:** Caseworkers must comply with the general case processing requirements derived from the Social Services Act, the Public Administration Act, and unwritten administrative norms. **Legal Gap:** None. This requirement is a direct restatement of existing, broad statutory obligations binding on all public authorities, requiring no new legal authority from § 35. **Thematic Category:** [OTHER] (General procedural compliance restating existing law)

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 of 10 **Circular/Source:** Kommunebrev 2025 (PROC-REQ-35.5) **Nature of Procedural Requirement:** Caseworkers should actively investigate whether individuals in the target group have a right to the program and must assist them with the application if necessary. **Legal Gap:** § 35 contains no provision establishing a duty for pre-application investigation or assistance; these legal obligations fall under §§ 29–30 and fvl. § 11, rendering the requirement's linkage to § 35 legally unsupported. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 10 of 10 **Circular/Source:** Kommunebrev 2025 (PROC-REQ-35.6) **Nature of Procedural Requirement:** The caseworker must procedurally sequence their actions by evaluating the user's right to the qualification program before imposing activity conditions. **Legal Gap:** § 35 contains no mandate regarding the sequential ordering of assessments relative to activity conditions; it imposes a strict procedural sequence ("skal vurderes") without any textual anchor in § 35. **Thematic Category:** [SEQUENCE]

Step 1 — Extract All Requirements for Process inflation(§ 36)

Requirement 1: Med egenmelding menes det at programdeltakeren skriftlig eller muntlig melder fra... uten å legge fram legeerklæring. Source: R-35 Para 4.36.1 (DOC-REQ-36.1)

Requirement 2: Hvis sykdom eller skade... varer ut over de tre kalenderdagene egenmelding er nyttet, kan kommunen i arbeids- og velferdsforvaltningen kreve legeerklæring. Source: R-35 Para 4.36.1 (DOC-REQ-36.2)

Requirement 3: Kommunen i arbeids- og velferdsforvaltningen kan kreve at programdeltakeren bekrefter en muntlig egenmelding etter at han eller hun har gjenopptatt programdeltakelsen. Source: R-35 Para 4.36.1 (DOC-REQ-36.3)

Requirement 4: Fra den fjerde dagen kan kommunen... kreve at barnets eller barnepasserens sykdom blir dokumentert med legeerklæring. Source: R-35 Para 4.36.1 (DOC-REQ-36.4)

Requirement 5: ...med mindre hun fremlegger legeattest om at det er bedre for henne å delta i program. Source: R-35 Para 4.36.1 (DOC-REQ-36.5)

Requirement 6: Ved ugyldig fravær, det vil si fravær som det ikke er gitt tillatelse til, reduseres stønaden tilsvarende time for time. Barnetillegget holdes utenfor. Source: R-35 Para 4.36.1 (PROC-REQ-36.1)

Requirement 7: Deltakere i program skal ha tett oppfølging fra Nav-kontoret. Source: R-35 Para 4.36.1 (PROC-REQ-36.2)

Requirement 8: Det er viktig at Nav-veileder har et godt samarbeid med tiltaksarrangører, utdanningsinsitusjoner og andre for å fange opp en deltakers fravær og eventuelt kunne følge opp med bedre tilrettelegging. Source: R-35 Para 4.36.1 (PROC-REQ-36.3)

Requirement 9: Godkjente permisjoner skal ikke medregnes i programmets varighet. Source: R-35 Para 4.36.1 (PROC-REQ-36.4)

Requirement 10: Kvalifiseringsstønaden innvilges i samme vedtak som kvalifiseringsprogrammet.... Source: R-35 Para 4.36.1.1 (PROC-REQ-36.5)

Requirement 11: Vedtaket skal opplyse om at stønaden reduseres som følge av ugyldig fravær. Source: R-35 Para 4.36.1.1 (DOC-REQ-36.6 / PROC-REQ-36.6)

Requirement 12: Reduksjon på grunn av ugyldig fravær gjøres administrativt med hjemmel i denne bestemmelsen og med grunnlag i registrert frammøte. Source: R-35 Para 4.36.1.1 (DOC-REQ-36.7 / PROC-REQ-36.7)

Requirement 13: Reduksjonen og begrunnelsen for den skal fremgå av saken. Tilsvarende gjelder for beslutninger om permisjoner. Source: R-35 Para 4.36.1.1 (DOC-REQ-36.8 + DOC-REQ-36.9 / PROC-REQ-36.8)

Requirement 14: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev 2025 (PROC-REQ-36.9)

Requirement 15: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: Kommunebrev 2025 (PROC-REQ-36.10)

Requirement 16: For personer som har rett til kvalifiseringsprogram kan tilrettelegging av programmet skje mens personen oppholder seg i fengselet, slik at det kan iverksettes ved løslatelse. Source: Nasjonal veileder kriminalomsorgen/NAV (PROC-REQ-36.11)

Requirement 17: ...må Nav-kontoret foreta en konkret vurdering av om forutsetningene for deltakelse i kvalifiseringsprogram under straffegjennomføring er til stede i hvert enkelt tilfelle. Source: Nasjonal veileder kriminalomsorgen/NAV (PROC-REQ-36.12)

Requirement 18: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sosialtjenesteloven § 17 (PROC-REQ-36.13)

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative format—specifically whether notification can be written or oral—without altering legal rights.

Requirement 2: [PROCEDURAL/DOCUMENTATION] This requirement establishes an evidentiary documentation standard by specifying when a medical certificate can be demanded.

Requirement 3: [PROCEDURAL/DOCUMENTATION] This requirement dictates post-hoc administrative record-keeping by allowing the municipality to demand written confirmation of an oral notification.

Requirement 4: [PROCEDURAL/DOCUMENTATION] This requirement dictates the documentation threshold necessary for a caseworker to verify an absence due to a sick child.

Requirement 5: [PROCEDURAL/DOCUMENTATION] This requirement establishes a strict evidentiary documentation prerequisite (a medical certificate) for a user to resume participation early after childbirth.

Requirement 6: [SUBSTANTIVE LEGAL OBLIGATION] This requirement concerns the substantive legal outcome by dictating the exact calculation method ("time for time") and explicitly excluding a financial component (Barnetillegget) from the reduction. *(Noted here, will not proceed to Step 3)*

Requirement 7: [PROCEDURAL/DOCUMENTATION] This requirement mandates a specific administrative process requiring caseworkers to ensure "close follow-up" with the participant.

Requirement 8: [PROCEDURAL/DOCUMENTATION] This requirement dictates an inter-agency administrative procedure for caseworkers to collaborate with organizers to detect participant absences.

Requirement 9: [SUBSTANTIVE LEGAL OBLIGATION] This requirement dictates a substantive legal outcome regarding the user's rights by altering the calculation rule for the program's overall legal duration. *(Noted here, will not proceed to Step 3)*

Requirement 10: [PROCEDURAL/DOCUMENTATION] This requirement dictates the formal administrative structure by requiring the qualification benefit and program to be bundled in the same decision document.

Requirement 11: [PROCEDURAL/DOCUMENTATION] This requirement dictates a specific communication process by demanding that the decision document contain explicit notification of the reduction consequence.

Requirement 12: [PROCEDURAL/DOCUMENTATION] **Ambiguous — recommend human legal review.** The finding explicitly notes legal-procedural uncertainty as to whether this dictates the purely procedural execution mechanism ("gjøres administrativt") or if it improperly alters the mandatory individual reduction decision.

Requirement 13: [PROCEDURAL/DOCUMENTATION] This requirement dictates the internal administrative record-keeping process by requiring reduction decisions and reasoning to be formally documented in the case file.

Requirement 14: [PROCEDURAL/DOCUMENTATION] This requirement dictates the procedural sequence of assessment steps, requiring the right to the program to be evaluated before setting activity conditions.

Requirement 15: [PROCEDURAL/DOCUMENTATION] This requirement dictates a proactive case processing procedure for caseworkers to actively identify and assist eligible persons with applications.

Requirement 16: [PROCEDURAL/DOCUMENTATION] This requirement dictates an administrative preparation process for setting up program facilitation while a person is incarcerated.

Requirement 17: [PROCEDURAL/DOCUMENTATION] This requirement dictates that caseworkers must execute an explicit concrete evaluation procedure to assess participation preconditions during a prison sentence.

Requirement 18: [PROCEDURAL/DOCUMENTATION] This requirement dictates the formal administrative procedure for structuring casework, mandating separate decisions for different legal measures.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: REQUIREMENT 1 av 13 Circular/Source: R-35 Para 4.36.1 (DOC-REQ-36.1) Nature of Procedural Requirement: Defines the procedural format for self-declaration as a written or oral notification without needing a medical certificate. Legal Gap: The specific notification format is established via a regulation under § 36's delegation space; the circular restates a delegated rule rather than filling a gap on its own independent authority. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: REQUIREMENT 2 av 13 Circular/Source: R-35 Para 4.36.1 (DOC-REQ-36.2) Nature of Procedural Requirement: The municipality may demand a medical certificate to document absences exceeding three days. Legal Gap: The 3-day medical threshold relies entirely on a separate regulation enacted under § 36's delegation, meaning the circular does not independently restrict discretion. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: REQUIREMENT 3 av 13 Circular/Source: R-35 Para 4.36.1 (DOC-REQ-36.3) Nature of Procedural Requirement: The caseworker may demand post-hoc written confirmation of an oral self-declaration. Legal Gap: The post-absence written confirmation rule is derived from a regulation enacted under § 36 delegation rather than the primary statutory text of § 36 itself. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: REQUIREMENT 4 av 13 Circular/Source: R-35 Para 4.36.1 (DOC-REQ-36.4) Nature of Procedural Requirement: Caseworkers can require a medical certificate from the fourth day to verify a child or caregiver's sickness. Legal Gap: The four-day documentation threshold stems from a separate regulation enacted under § 36's delegation; it is not established independently by the circular. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: REQUIREMENT 5 av 13 Circular/Source: R-35 Para 4.36.1 (DOC-REQ-36.5) Nature of Procedural Requirement: The participant must provide a medical certificate to resume the program before their default maternity leave expires. Legal Gap: This specific implied mandatory condition is derived entirely from a

regulation authorized by § 36, rather than the text of § 36 itself. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: REQUIREMENT 7 av 13 Circular/Source: R-35 Para 4.36.1 (PROC-REQ-36.2) Nature of Procedural Requirement: Participants must be given mandatory close follow-up from the NAV office. Legal Gap: § 36 solely governs the consequence of absence and its exceptions; it lacks any proper legal basis to impose a mandatory close follow-up duty during program participation. Thematic Category: [OTHER] (Case management and supervision procedure requirement)

Requirement Reference: 8 Finding Reference: REQUIREMENT 8 av 13 Circular/Source: R-35 Para 4.36.1 (PROC-REQ-36.3) Nature of Procedural Requirement: NAV advisors should collaborate with program organizers and other institutions to detect absences. Legal Gap: § 36 contains no provision authorizing or requiring inter-institutional collaboration, making the requirement's link to § 36 textually unsupported. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 10 Finding Reference: REQUIREMENT 10 av 13 Circular/Source: R-35 Para 4.36.1.1 (PROC-REQ-36.5) Nature of Procedural Requirement: The qualification benefit must be granted within the same administrative decision as the qualification program. Legal Gap: § 36 governs absence reductions and does not address or authorize procedural rules regarding whether the benefit and program must be bundled into a single joint decision. Thematic Category: [OTHER] (Administrative decision structuring requirement)

Requirement Reference: 11 Finding Reference: REQUIREMENT 11 av 13 Circular/Source: R-35 Para 4.36.1.1 (DOC-REQ-36.6 / PROC-REQ-36.6) Nature of Procedural Requirement: The administrative decision document must explicitly inform the user that the benefit will be reduced for invalid absences. Legal Gap: § 36 is entirely silent on granting decision content; any potential legal basis would have to rely on a general administrative law duty (fvl. § 17) rather than § 36 itself. Thematic Category: [USER-COMM]

Requirement Reference: 12 Finding Reference: REQUIREMENT 12 av 13 Circular/Source: R-35 Para 4.36.1.1 (DOC-REQ-36.7 / PROC-REQ-36.7) Nature of Procedural Requirement: Reductions are to be executed administratively based on registered attendance rather than through individual decisions. Legal Gap: § 36 mandates the reduction but does not specify the procedural mechanism, leaving a gap and uncertainty over whether individual decisions are required under general administrative law instead of an ongoing administrative execution. Thematic Category: [OTHER] (Administrative execution procedure requirement)

Requirement Reference: 13 Finding Reference: REQUIREMENT 13 av 13 Circular/Source: R-35 Para 4.36.1.1 (DOC-REQ-36.8 + DOC-REQ-36.9 / PROC-REQ-36.8) Nature of Procedural Requirement: The reduction decision, its justification, and any leave decisions must appear in the case file. Legal Gap: This requirement directly implements general administrative law documentation obligations (fvl. §§ 15 and 25) rather than stemming directly from § 36's substantive text. Thematic Category: [DOC-REQ]

Requirement Reference: 14 Finding Reference: ORPHAN 1 Circular/Source: Kommunebrev 2025 (PROC-REQ-36.9) Nature of Procedural Requirement: The right to a qualification program must be assessed before any activity conditions are imposed. Legal Gap: § 36

does not address pre-conditions for setting activity requirements; the requirement belongs to § 29 and § 20, demonstrating a misattribution of legal basis. Thematic Category: [SEQUENCE]

Requirement Reference: 15 Finding Reference: ORPHAN 2 Circular/Source: Kommunebrev 2025 (PROC-REQ-36.10) Nature of Procedural Requirement: The NAV office should actively investigate eligibility and assist target group persons in applying. Legal Gap: § 36 solely governs mid-program benefit reductions and offers no statutory basis for proactive pre-enrolment outreach obligations. Thematic Category: [ASSESS-PROC]

Requirement Reference: 16 Finding Reference: ORPHAN 3 Circular/Source: Nasjonal veileder kriminalomsorgen/NAV (PROC-REQ-36.11) Nature of Procedural Requirement: Program facilitation and preparation can occur while the user is still in prison for implementation upon release. Legal Gap: § 36 governs absence from active programs; it lacks authority and provides no basis for pre-release program preparation, which should be anchored in §§ 29-30. Thematic Category: [OTHER] (Pre-release planning procedure requirement)

Requirement Reference: 17 Finding Reference: ORPHAN 4 Circular/Source: Nasjonal veileder kriminalomsorgen/NAV (PROC-REQ-36.12) Nature of Procedural Requirement: Caseworkers must conduct a concrete evaluation of whether program participation preconditions are met during a prison sentence. Legal Gap: § 36 handles the financial consequences of program absence and has no legal authority to govern concrete eligibility and participation precondition assessments. Thematic Category: [ASSESS-PROC]

Requirement Reference: 18 Finding Reference: ORPHAN 5 Circular/Source: Veileder til sosialtjenesteloven § 17 (PROC-REQ-36.13) Nature of Procedural Requirement: A § 17 service measure must be formalized in its own separate decision, distinct from the § 29 program decision. Legal Gap: § 36 contains no authority whatsoever over how § 17 measures are formally decided, placing this requirement entirely outside the paragraph's scope. Thematic Category: [OTHER] (Formal decision separation procedure requirement)

Step 1 — Extract All Requirements for Process inflation(§ 37)

Requirement 1: Kvalifiseringsstønaden avkortes time for time hvis deltakeren har inntektsgivende arbeid eller gjennomfører læretid. Source: R-35 Para 37 (innledning)

Requirement 2: Det skal også gjøres avkortning i barnetillegget. Source: R-35 Para 37 (innledning/beregning)

Requirement 3: Ved utregning vil det være hensiktsmessig å slå sammen timene til hele dager, som trekkes fra stønaden før utbetaling. Source: R-35 Para 37 (beregningsmetode)

Requirement 4: Det skal samordnes time for time uavhengig av om arbeidet foregår på dagtid, kveld, natt eller helg. Source: R-35 Para 37 (beregningsmetode)

Requirement 5: Timer som eventuelt blir til overs og utgjør mindre enn en dag, tas det ikke hensyn til. Source: R-35 Para 37 (beregningsmetode)

Requirement 6: Kvalifiseringsstønaden innvilges i samme vedtak som kvalifiseringsprogrammet. Source: R-35 Para 4.37.1.1 (Vedtak og klage — innledning)

Requirement 7: Vedtaket skal opplyse om at stønaden kan samordnes med arbeidsinntekt mv. Source: R-35 Para 4.37.1.1 (Vedtak og klage — midten)

Requirement 8: Reduksjon på grunn av inntektsgivende arbeid gjøres administrativt med hjemmel i denne bestemmelsen. Source: R-35 Para 4.37.1.1 (Vedtak og klage — midten)

Requirement 9: Reduksjonen og begrunnelsen for den skal fremgå av saken. Source: R-35 Para 4.37.1.1 (Vedtak og klage — slutten)

Requirement 10: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev 2025

Requirement 11: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram... Source: Kommunebrev 2025

Requirement 12: Innsatte i fengsel kan få innvilget kvalifiseringsprogram hvis oppholdet i fengsel er av kortere varighet enn seks måneder... Source: Nasjonal veileder for kriminalomsorgen

Requirement 13: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sosialtjenesteloven § 17

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] The requirement establishes an exact mathematical formula for executing the legal duty to reduce the benefit.

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] The requirement directly states the legal outcome that child supplements must be included in the reduction.

Requirement 3: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement introduces an operational administrative calculation method (consolidating hours to days) that is not specified in the statute.

Requirement 4: [SUBSTANTIVE LEGAL OBLIGATION] The requirement clarifies the substantive reach of the hour-based calculation formula by establishing that it applies universally regardless of the time of day.

Requirement 5: [SUBSTANTIVE LEGAL OBLIGATION] The requirement directly modifies the substantive statutory calculation formula by categorically excluding a specific class of hours (sub-full-day remainders) from the reduction.

Requirement 6: [PROCEDURAL/DOCUMENTATION] The requirement dictates administrative form by imposing a structural mandate about joint decision-making.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement imposes a specific information and communication duty on the decision document itself.

Requirement 8: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement dictates the procedural mechanism for implementation by allowing administrative execution instead of a formal separate decision.

Requirement 9: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement imposes a mandatory case-file documentation obligation for the administrative record.

Requirement 10: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative process by imposing an explicit sequencing rule on the eligibility assessment.

Requirement 11: [PROCEDURAL/DOCUMENTATION] The requirement directs caseworker activity by imposing a duty to proactively investigate potential target groups.

Requirement 12: [SUBSTANTIVE LEGAL OBLIGATION] The requirement sets a substantive legal threshold regarding who is eligible to receive the qualification program.

Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement dictates administrative form by regulating the exact structure of formal decisions for advisory services.

Step 3 — Structured Entry

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 37.3 **Circular/Source:** R-35 Para 37 (beregningsmetode) **Nature of Procedural Requirement:** Administrators are instructed to bundle calculated hours into whole days before deducting them from the benefit payout. **Legal Gap:** § 37 authorizes an hour-based calculation but neither prescribes nor prohibits a day-bundling technique, leaving ambiguity regarding whether general

administrative authority covers this calculation methodology. **Thematic Category:** [OTHER] Relates strictly to internal computational methodology and calculation tactics.

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 37.6 **Circular/Source:** R-35 Para 4.37.1.1 (Vedtak og klage — innledning) **Nature of Procedural Requirement:** The qualification benefit must be granted within the exact same formal decision document as the qualification program. **Legal Gap:** § 37 is strictly a substantive economic coordination rule and grants no authority to regulate decision form, structure, or procedure. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 37.7 **Circular/Source:** R-35 Para 4.37.1.1 (Vedtak og klage — midten) **Nature of Procedural Requirement:** The decision document must inform the user that the benefit can be coordinated with work income. **Legal Gap:** § 37 contains no provisions regarding mandatory decision content, creating ambiguity as to whether independent administrative laws are required to support this information duty. **Thematic Category:** [USER-COMM]

Requirement Reference: 8 **Finding Reference:** REQUIREMENT 37.8 **Circular/Source:** R-35 Para 4.37.1.1 (Vedtak og klage — midten) **Nature of Procedural Requirement:** The income reduction must be implemented administratively rather than issuing a new formal decision for each reduction instance. **Legal Gap:** § 37 establishes the reduction formula but is completely silent on the procedural mechanism, making it legally ambiguous whether the statute implies administrative execution. **Thematic Category:** [OTHER] Dictates the legal procedural mechanism (administrative vs. formal decision) for executing a reduction.

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 37.9 **Circular/Source:** R-35 Para 4.37.1.1 (Vedtak og klage — slutten) **Nature of Procedural Requirement:** The calculated reduction and the specific justification for it must be actively documented in the case record. **Legal Gap:** § 37 contains no documentation or case-file recording requirements, meaning authority must be evaluated against general administrative duties elsewhere. **Thematic Category:** [DOC-REQ]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 37.10 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** The right to a qualification program must be assessed first before any activity conditions are established. **Legal Gap:** § 37 regulates economic coordination only; this sequential obligation has no functional or textual basis in the provision. **Thematic Category:** [SEQUENCE]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 37.11 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** NAV caseworkers should actively investigate if individuals in the target group might have a right to the program. **Legal Gap:** Active investigation of program eligibility falls entirely outside § 37's scope, as the statute dictates nothing about who must be investigated or how. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 37.13 **Circular/Source:** Veileder til sosialtjenesteloven § 17 **Nature of Procedural Requirement:** The advisory service must be issued in its own separate decision under § 17, apart from the program decision under § 29. **Legal Gap:** § 37 deals exclusively with economic reduction formulas;

the structuring and form of advisory service decisions fall entirely outside its bounds.
Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 38)

Requirement 1: "skal kvalifiseringsstønaden reduseres krone for krone" **Source:** R-35 Para 38, seksjon 4.38.1 (begynnelse)

Requirement 2: "kan kommunen kreve refusjon i beløpet" **Source:** R-35 Para 38, seksjon 4.38.1 (begynnelse)

Requirement 3: "må det foretas en konkret vurdering av om det er saklig grunn til midlertidig å avbryte eller avslutte programmet" **Source:** R-35 Para 38, seksjon 4.38.1 (midtre del — ved krav om uføretrygd)

Requirement 4: "må det foretas en konkret vurdering på tilsvarende måte som for uføretrygd" **Source:** R-35 Para 38, seksjon 4.38.1 (midtre del — ved søknad om AAP/overgangsstønad)

Requirement 5: "Vedtaket skal opplyse om at stønaden kan samordnes med andre offentlige ytelser." **Source:** R-35 Para 38, seksjon 4.38.1.1 (Vedtak og klage)

Requirement 6: "Reduksjonen og begrunnelsen for den skal fremgå av saken." **Source:** R-35 Para 38, seksjon 4.38.1.1 (Vedtak og klage — avslutning)

Requirement 7: "Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet." **Source:** Kommunebrev 2025 (tilknyttet § 38 i kartlegging)

Requirement 8: "må Nav-kontoret foreta en konkret vurdering av om forutsetningene for deltakelse i kvalifiseringsprogram under straffegjennomføring er til stede" **Source:** Veileder Kriminalomsorg (tilknyttet § 38 i kartlegging)

Step 2 — Classify Each Requirement

Requirement 1 Classification: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The requirement dictates a mandatory mathematical financial consequence where the benefit must be reduced equally to the overlapping entitlement. *(Note: Does not proceed to Step 3)*

Requirement 2 Classification: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The requirement establishes the municipality's genuine substantive discretion over whether and to what extent they may claim full or partial refusion. *(Note: Does not proceed to Step 3)*

Requirement 3 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement imposes a mandatory procedural assessment obligation regarding programme interruption or termination when a disability pension is applied for.

Requirement 4 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement extends a mandatory procedural assessment obligation regarding programme participation status to scenarios where AAP or overgangsstønad is applied for.

Requirement 5 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) **Justification:** The requirement dictates the mandatory drafting content of the decision document (enkeltvedtak), specifically the obligation to state that coordination with other benefits may occur.

Requirement 6 Classification: [PROCEDURAL/DOCUMENTATION] (Ambiguous — recommend human legal review) **Justification:** The requirement establishes a mandatory case-file documentation and record-keeping procedure for recording the reduction and its justification.

Requirement 7 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement imposes a mandatory procedural sequencing obligation to evaluate qualification programme eligibility before setting activity conditions on social assistance.

Requirement 8 Classification: [PROCEDURAL/DOCUMENTATION] **Justification:** The requirement dictates that the Nav office must execute a concrete procedural assessment of whether the conditions for programme participation are met during incarceration.

Step 3 — Structured Entry

Requirement Reference: Requirement 3 **Finding Reference:** PROC-REQ 38.3 **Circular/Source:** R-35 Para 38, seksjon 4.38.1 (midtre del — ved krav om uføretrygd) **Nature of Procedural Requirement:** A concrete assessment must be made regarding whether there is an objective reason to temporarily interrupt or terminate the programme. **Legal Gap:** § 38 strictly limits its scope to financial reduction and refusion rights, thereby providing no statutory authority or mandate to assess the interruption or termination of the programme itself. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: Requirement 4 **Finding Reference:** PROC-REQ 38.4 **Circular/Source:** R-35 Para 38, seksjon 4.38.1 (midtre del — ved søknad om AAP/overgangsstønad) **Nature of Procedural Requirement:** A concrete assessment must be made in a corresponding manner as with disability pensions regarding the programme status when AAP or overgangsstønad is applied for. **Legal Gap:** § 38 provides no mandate to assess programme participation status when a participant applies for AAP or overgangsstønad, as it strictly addresses financial coordination and refusion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: Requirement 5 **Finding Reference:** PROC-REQ 38.5 **Circular/Source:** R-35 Para 38, seksjon 4.38.1.1 (Vedtak og klage) **Nature of Procedural**

Requirement: The decision document (vedtak) must contain explicit information notifying that the benefit can be coordinated with other public benefits. **Legal Gap:** § 38 is exclusively substantive and contains no textual provision requiring specific content or information to be included within the drafting of the decision. **Thematic Category:** [DOC-REQ]

Requirement Reference: Requirement 6 **Finding Reference:** PROC-REQ 38.6 **Circular/Source:** R-35 Para 38, seksjon 4.38.1.1 (Vedtak og klage — avslutning) **Nature of Procedural Requirement:** The reduction of the benefit and the justification for it must be explicitly documented in the case file. **Legal Gap:** While § 38 creates the substantive duty to reduce the benefit, it contains absolutely no text or provision addressing record-keeping or case-file documentation obligations. **Thematic Category:** [DOC-REQ]

Requirement Reference: Requirement 7 **Finding Reference:** PROC-REQ 38.7 **Circular/Source:** Kommunebrev 2025 (tilknyttet § 38 i kartlegging) **Nature of Procedural Requirement:** The procedural evaluation of the right to the qualification programme must take place sequentially before imposing activity conditions on social assistance. **Legal Gap:** § 38 deals solely with overlapping public benefits and refusion rights, providing no legal basis for procedural sequencing requirements regarding social assistance. **Thematic Category:** [SEQUENCE]

Requirement Reference: Requirement 8 **Finding Reference:** PROC-REQ 38.8 **Circular/Source:** Veileder Kriminalomsorg (tilknyttet § 38 i kartlegging) **Nature of Procedural Requirement:** The Nav office is obligated to conduct a concrete assessment to determine if the preconditions for participating in the qualification programme during a prison sentence are met. **Legal Gap:** § 38 addresses financial coordination and refusion, providing no legal basis or authority for obligations relating to assessing programme participation during incarceration. **Thematic Category:** [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 39)

Requirement 1: Utbetaling av kvalifiseringsstønad skjer etterskuddsvis på grunnlag av registrert frammøte. Source: R-35, § 4.39.1

Requirement 2: Etterskuddsvis utbetaling av kvalifiseringsstønaden innebærer at stønaden må være opptjent først. Source: R-35, § 4.39.1

Requirement 3: Opptjening skjer ved deltakelse i programmet og frammøtet skal registreres. Source: R-35, § 4.39.1

Requirement 4: Ugyldig fravær fører til reduksjon i stønaden. Source: R-35, § 4.39.1

Requirement 5: Kommunen beslutter hvordan og til hvilke tidspunkter utbetaling skal skje. Source: R-35, § 4.39.1

Requirement 6: Det at første utbetaling av kvalifiseringsstønaden skjer etterskuddsvis, gjør at det kan være nødvendig å sikre deltakeren livsopphold fram til utbetalingen. Source: R-35, § 4.39.1

Requirement 7: Det skal derfor gis skattefritak for juni og halvt trekk i desember. Source: R-35, § 4.39.1

Requirement 8: Trygdeavgift for stønaden betales med mellomsats etter folketrygdloven. Source: R-35, § 4.39.1

Requirement 9: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev 2025

Requirement 10: Nav-kontoret bør aktivt undersøke om personer som er i målgruppen kan ha rett på kvalifiseringsprogram, og gi hjelp til å søke der det er nødvendig. Source: Kommunebrev 2025

Requirement 11: For personer som har rett til kvalifiseringsprogram kan tilrettelegging av programmet skje mens personen oppholder seg i fengselet, slik at det kan iverksettes ved løslatelse. Source: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav

Requirement 12: Tjenesten som tiltak skal fattes i et eget vedtak etter sotjl. § 17, og ikke inngå i vedtaket om kvalifiseringsprogram etter sotjl. § 29. Source: Veileder til sosialtjenesteloven § 17

Requirement 13: Programmet skal innvilges selv om det ved oppstart er usikkert om deltakeren kan komme i arbeid etter avsluttet program. Source: Veileder økonomisk stønad 2022

Requirement 14: Ved behandling av søknad om kvalifiseringsprogram skal derfor ingen utelukkes med den begrunnelse at deltakelse ikke vil føre til varig heltidsarbeid. Source: Veileder økonomisk stønad 2022

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding analyzes this as a mandatory-closed rule dictating the legal standard for payment timing and basis.

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding determines this requirement establishes the legal threshold that the entitlement must be accrued prior to payment.

Requirement 3: [PROCEDURAL/DOCUMENTATION] Justification: The finding establishes that this dictates the administrative process of documenting and registering participant attendance.

Requirement 4: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding identifies the benefit reduction as a substantive legal outcome resulting directly from invalid absence.

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: The finding categorizes this as permissive delegation regarding the administrative procedure of determining the methods and timing of payments.

Requirement 6: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding explicitly links this requirement to the substantive legal right to interim subsistence governed by § 18.

Requirement 7: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding specifies that this imposes a substantive legal duty regarding the specific tax treatment of the benefit.

Requirement 8: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding notes this dictates the substantive legal standard for calculating national insurance contribution rates.

Requirement 9: [PROCEDURAL/DOCUMENTATION] Justification: The finding outlines this as a sequential step a caseworker must follow when processing program eligibility versus setting activity conditions.

Requirement 10: [PROCEDURAL/DOCUMENTATION] Justification: The finding categorizes this as an administrative process directive concerning how caseworkers should proactively identify and assist applicants.

Requirement 11: [PROCEDURAL/DOCUMENTATION] Justification: The finding addresses this as an inter-agency administrative setup procedure occurring prior to a participant's release from prison.

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this dictates administrative form by mandating that the service must be structured as a separate decision document.

Requirement 13: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding analyzes this as a substantive legal threshold governing the standard for granting programme admission.

Requirement 14: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding identifies this as a substantive non-discrimination obligation regarding the legal outcomes of programme eligibility assessment.

Step 3 — Structured Entry

Requirement Reference: 3 **Finding Reference**: PROC-REQ-39.3 **Circular/Source**: R-35, § 4.39.1 **Nature of Procedural Requirement**: Participant attendance must be actively registered by the municipality. **Legal Gap**: There is no gap; the finding explicitly concludes this has legal basis (HAS_HJEMMEL) as a direct articulation of the statutory presupposition that attendance must be registered. **Thematic Category**: [DOC-REQ]

Requirement Reference: 5 **Finding Reference**: PROC-REQ-39.5 **Circular/Source**: R-35, § 4.39.1 **Nature of Procedural Requirement**: The municipality must establish the administrative methods and schedules for benefit disbursement. **Legal Gap**: There is no gap; the finding concludes this verbatim matches the explicit statutory delegation of procedural how-discretion granted to municipalities (HAS_HJEMMEL). **Thematic Category**: [OTHER] - Dictates the permissive administrative delegation of payment systems.

Requirement Reference: 9 **Finding Reference**: PROC-REQ-39.9 **Circular/Source**: Kommunebrev 2025 **Nature of Procedural Requirement**: Caseworkers must perform the assessment of the right to the program prior to imposing any activity conditions. **Legal Gap**: The finding establishes a MANGLER_HJEMMEL gap, noting that this requirement belongs to eligibility under § 29 and lacks any statutory basis under the payment-administration rules of § 39. **Thematic Category**: [SEQUENCE]

Requirement Reference: 10 **Finding Reference**: PROC-REQ-39.10 **Circular/Source**: Kommunebrev 2025 **Nature of Procedural Requirement**: Caseworkers should proactively investigate potential target groups and actively provide application assistance. **Legal Gap**: The finding establishes a MANGLER_HJEMMEL gap, identifying this as a programme access issue that falls entirely outside the scope of § 39's payment method and timing authority. **Thematic Category**: [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference**: PROC-REQ-39.11 **Circular/Source**: Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav **Nature of Procedural Requirement**: The program should be arranged and facilitated during incarceration to ensure it is ready to be implemented upon the participant's release. **Legal Gap**: The finding establishes a MANGLER_HJEMMEL gap, concluding that programme setup and facilitation lack statutory footing in § 39. **Thematic Category**: [REFERRAL-COORD]

Requirement Reference: 12 **Finding Reference**: PROC-REQ-39.12 **Circular/Source**: Veileder til sosialtjenesteloven § 17 **Nature of Procedural Requirement**: The service measure must be documented and issued in a separate decision letter, strictly separated from the qualification program decision. **Legal Gap**: The finding establishes a MANGLER_HJEMMEL gap, stating that § 39 grants no authority over decision-structuring, as the true statutory bases for this form requirement (§ 17 and § 29) are absent from the mapping. **Thematic Category**: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 40)

Requirement: Dersom en person har fått utbetalt høyere kvalifiseringsstønad enn det vedkommende har krav på, kan det overskytende trekkes i framtidig stønad. Source: R-35 § 40 / PROC-REQ-40.1.

Requirement: Nav-kontoret må imidlertid vurdere om det er rimelig å ta slike feilutbetalinger tilbake ved direkte trekk i framtidig stønad. Source: R-35 § 40 / PROC-REQ-40.2.

Requirement: Det er ikke anledning til å inngå avtale med deltakeren om trekk i kvalifiseringsstønad for å dekke kommunens krav. Source: R-35 § 40 / PROC-REQ-40.3.

Requirement: Forholdet kan politianmeldes uavhengig av om det fattes vedtak om tilbakebetaling eller ikke. Source: R-35 § 40 / PROC-REQ-40.4.

Requirement: Trekk i framtidig stønad etter bestemmelsens første ledd er en administrativ beslutning som kan fattes med hjemmel i bestemmelsens første ledd. Source: R-35 § 40 / PROC-REQ-40.5.

Requirement: Beslutningen og vurderingene som er gjort skal fremgå av saken. Source: R-35 § 40 / PROC-REQ-40.6.

Requirement: Beslutningen kan påklages til beslutningstakeren, enten dette er Nav-kontoret eller kommunen. Source: R-35 § 40 / PROC-REQ-40.7.

Requirement: Avgjørelse om å kreve tilbakebetaling på grunn av uriktige opplysninger etter bestemmelsens annet ledd er et enkeltvedtak som kan påklages til statsforvalteren. Source: R-35 § 40 / PROC-REQ-40.8.

Step 2 — Classify Each Requirement

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] This requirement establishes the pure, permissive legal power granting the authority a free choice over whether to deduct the excess benefit. *Noted here, do not proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review; the requirement imposes a mandatory procedural assessment step while simultaneously introducing a substantive normative standard ("rimelig") absent from the statute.

Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review; the requirement dictates an absolute prohibition on a specific recovery method, which is an administrative restriction on how recovery may be effectuated.

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement introduces an external procedural step for police reporting that is governed entirely by general criminal procedural law.

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates administrative form by classifying the specific type of legal act as an "administrativ beslutning".

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement explicitly dictates the administrative documentation process by mandating that both the decision and underlying assessments must be recorded in the case file.

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement specifies an internal procedural complaint route for appealing an administrative decision to the decision-maker.

Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative characterization of the decision as an "enkeltvedtak" and specifies the formal procedural appeal route to the County Governor.

Step 3 — Structured Entry

Requirement Reference: 2 Finding Reference: PROC-REQ-40.2 Circular/Source: R-35 § 40 / PROC-REQ-40.2 Nature of Procedural Requirement: The NAV office is required to perform a mandatory fairness and proportionality assessment to determine if direct deduction is reasonable. Legal Gap: The statute grants an open, purely permissive "kan" authority with no preconditions, whereas the circular enforces a mandatory two-step process requiring an analytical fairness assessment and importing a normative standard ("rimelig") entirely absent from the statutory text. Thematic Category: [ASSESS-PROC]

Requirement Reference: 3 Finding Reference: PROC-REQ-40.3 Circular/Source: R-35 § 40 / PROC-REQ-40.3 Nature of Procedural Requirement: The authority is absolutely prohibited from utilizing voluntary deduction agreements with the participant as a method to recover the municipality's claims. Legal Gap: Neither § 40 nor § 23 restricts the mechanism of recovery, yet the circular imposes an absolute prohibition that exceeds what the permissive statutory framework supports without explicit authority. Thematic Category: [OTHER] Restriction on recovery mechanisms and authorized administrative methods.

Requirement Reference: 4 Finding Reference: PROC-REQ-40.4 Circular/Source: R-35 § 40 / PROC-REQ-40.4 Nature of Procedural Requirement: The authority may execute the procedure of filing a police report regarding the matter, independent of any repayment decision. Legal Gap: § 40 contains no authority or conditions regarding police reporting; the requirement is entirely outside the scope of § 40 and lacks any statutory citation. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 5 Finding Reference: PROC-REQ-40.5 Circular/Source: R-35 § 40 / PROC-REQ-40.5 Nature of Procedural Requirement: The decision for future benefit deduction under the first paragraph must be processed and categorized administratively as an "administrativ beslutning". Legal Gap: There is no legal gap; the characterization is a

legally accurate interpretive statement consistent with the statutory text, as no formal "enkeltvedtak" procedure is prescribed for the first paragraph. Thematic Category: [OTHER] Classification of administrative act form.

Requirement Reference: 6 Finding Reference: PROC-REQ-40.6 Circular/Source: R-35 § 40 / PROC-REQ-40.6 Nature of Procedural Requirement: The caseworker must ensure that the administrative decision, as well as all factual and legal assessments made during the exercise of discretion, are documented and appear in the case file. Legal Gap: The statutory text grants an open authority with no procedural or documentation prescriptions, whereas the circular dictates a mandatory "skal" obligation to document both the decision and its assessments, restricting the authority's freedom to act informally. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: PROC-REQ-40.7 Circular/Source: R-35 § 40 / PROC-REQ-40.7 Nature of Procedural Requirement: The administrative process must accommodate an appeal of the decision directly to the decision-maker, whether that is the NAV office or the municipality. Legal Gap: § 40 first paragraph contains no provision addressing the right to appeal this specific administrative decision, making this specific procedural route a mechanism without direct grounding in the statutory text. Thematic Category: [SEQUENCE]

Requirement Reference: 8 Finding Reference: PROC-REQ-40.8 Circular/Source: R-35 § 40 / PROC-REQ-40.8 Nature of Procedural Requirement: Repayment decisions derived from incorrect information under the second paragraph must be processed administratively as an "enkeltvedtak" with appeal rights to the County Governor (statsforvalteren). Legal Gap: There is no legal gap; categorizing this action as an "enkeltvedtak" appealable to the County Governor is legally consistent with the combined effect of the mandatory reference to § 23 and general administrative law. Thematic Category: [OTHER] Formal procedural categorization and appeal routing.

Step 1 — Extract All Requirements for Process inflation(§ 41)

Requirement 1: Nav-kontoret har videre plikt til å nedtegne muntlige søknader. Source: R-35, § 41, avsnitt 5.41.2.2 (DOC-REQ-41.1). Requirement 2: Opplysninger i saken skal alltid være skriftlig, enten dette er i form av innhentede dokumenter eller nedtegnelser i søknad eller øvrige saksdokumenter. Source: R-35, § 41, avsnitt 5.41.2.3 (DOC-REQ-41.2). Requirement 3: Vedtaket som fattes skal begrunnes. Source: R-35, § 41, avsnitt 5.41.2.4 (DOC-REQ-41.3). Requirement 4: Begrunnelsen skal være skriftlig og inneholde tre elementer: den skal vise til reglene vedtaket bygger på, den skal nevne de faktiske forhold som har vært avgjørende, den bør nevne de hovedhensyn det er lagt vekt på ved

skjønnsutøvelsen. Source: R-35, § 41, avsnitt 5.41.2.4 (DOC-REQ-41.4). Requirement 5: Det må klart og tydelig fremgå at det samtykkes, hva samtykket innebærer og samtykkets varighet bør fremkomme. Source: R-35, § 41, avsnitt 5.41.2.5 (DOC-REQ-41.5). Requirement 6: Det er Nav-kontoret som må sannsynliggjøre at det foreligger et samtykke, og det bør derfor være skriftlig i form av en samtykkeerklæring. Source: R-35, § 41, avsnitt 5.41.2.5 (DOC-REQ-41.6). Requirement 7: Dersom vi velger et resultat som innebærer at barnets beste ikke får gjennomslag må dette begrunnes særskilt og skriftlig for å sikre etterprøvbarhet og barnets rettssikkerhet. Source: Barnets beste – veileder (DOC-REQ-41.7). Requirement 8: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste – veileder (DOC-REQ-41.8). Requirement 9: Både kriminalomsorgen og velferdstjenestene har ansvar for å innhente slikt samtykke, og for arkivering og journalføring av samtykket i eget journalsystem. Source: Nasjonal veileder for samarbeid mellom kriminalomsorgen og Nav (DOC-REQ-41.9). Requirement 10: Nav-kontoret har plikt til å nedtegne muntlige søknader. [...] det holder at søknaden fremgår av saken, som i et notat. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-41.10). Requirement 11: kan også være muntlig, og skrives ned i journalnotat av NAV-kontoret. Source: Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ-41.11). Requirement 12: Hvis det er forhold ved saken som gjør at tjenesten avsluttes, som for eksempel at den anses som gitt eller det ikke er mulig å få gjort noe mer, skal det skrives et avslutningsnotat, eventuelt et avslutningsbrev som informasjon til brukeren. Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-41.12). Requirement 13: Nav-kontoret har plikt til å gi informasjon og veiledning om tjenester, rettigheter og plikter etter loven. Source: R-35, § 41, begynnelse (PROC-REQ-41.1). Requirement 14: Nav-kontoret har videre plikt til å nedtegne muntlige søknader. Søknader skal aldri avslås muntlig. Source: R-35, § 41, begynnelse (PROC-REQ-41.2). Requirement 15: Nav-kontoret skal sikre at saken er så godt opplyst som mulig før det treffes en avgjørelse. Source: R-35, § 41, før avgjørelse (PROC-REQ-41.3). Requirement 16: Den individuelle vurderingen skal foretas konkret i hver sak ut fra tjenestemottakers behov på søknadstidspunktet. Source: R-35, § 41, midten (PROC-REQ-41.4). Requirement 17: Hjemmebesøk skal aldri foretas uten tjenestemottakers samtykke. Nav-kontoret kan ikke pålegge tjenestemottaker å undertegne en samtykkeerklæring. Source: R-35, § 41, midten (PROC-REQ-41.5). Requirement 18: Nav-kontoret må sørge for at fremmedspråklige forstår den informasjonen som gis, og de som trenger det har krav på bruk av tolk. Tjenestemottakers barn skal aldri brukes i stedet for tolk. Source: R-35, § 41, gjennomgående (PROC-REQ-41.6). Requirement 19: Vedtaket som fattes skal begrunnes. Dette er for å sikre at det fattes en riktig avgjørelse som er forståelig. Begrunnelsen skal være skriftlig og inneholde tre elementer. Source: R-35, § 41, slutten (PROC-REQ-41.7). Requirement 20: Tjenestemottaker skal ha varsel om mulig utestenging og anledning til å uttale seg før endelig beslutning tas. Source: R-35, § 41, før avgjørelse (PROC-REQ-41.8). Requirement 21: Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet. Source: Kommunebrev (PROC-REQ-41.9). Requirement 22: Hvis henvendelsen gjelder hjelp i en nødsituasjon, må søknaden vurderes raskt, helst samme dag. Source: Veileder om økonomisk stønad etter sosialtjenesteloven (PROC-REQ-41.10). Requirement 23: NAV-kontoret må være aktive i kartleggingsprosessen slik at man får avdekket hva brukeren har behov for. Source: Veileder om økonomisk stønad etter sosialtjenesteloven (PROC-REQ-41.11). Requirement 24: Vedtak om innvilgelse skal inneholde tidspunkt for oppstart av tjenesten, i form av konkret timeavtale eller frist for når

første samtale skal være avholdt. Source: Veileder til sosialtjenesteloven § 17 (PROC-REQ-41.12).

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative step of recording an oral application. Requirement 2: [PROCEDURAL/DOCUMENTATION] The requirement dictates the absolute written form for all case information, which is an administrative process standard. Requirement 3: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative act of producing a formal justification for a decision. Requirement 4: [PROCEDURAL/DOCUMENTATION] The requirement governs how a decision must be documented, specifying three written elements. Requirement 5: [PROCEDURAL/DOCUMENTATION] The requirement specifies the administrative form and necessary content of a consent declaration. Requirement 6: [PROCEDURAL/DOCUMENTATION] The requirement dictates the procedural burden of proof and administrative form (written declaration) for consent. Requirement 7: [PROCEDURAL/DOCUMENTATION] The requirement mandates a special documentation process (written justification) when diverging from the child's best interests. Requirement 8: [PROCEDURAL/DOCUMENTATION] The requirement mandates the documentation of evaluations to ensure administrative verifiability. Requirement 9: [PROCEDURAL/DOCUMENTATION] The requirement sets internal records management procedures for archiving and journalizing consent. Requirement 10: [PROCEDURAL/DOCUMENTATION] The requirement governs the administrative documentation of oral requests in the form of a case note. Requirement 11: [PROCEDURAL/DOCUMENTATION] The requirement mandates the record-keeping format (journal note) for documenting oral communications. Requirement 12: [PROCEDURAL/DOCUMENTATION] The requirement dictates the administrative necessity of writing a closing note or letter when a service is terminated. Requirement 13: [PROCEDURAL/DOCUMENTATION] The requirement mandates the procedural step of communicating information and guidance to the user. Requirement 14: [PROCEDURAL/DOCUMENTATION] The requirement dictates how applications are recorded and structurally prohibits the administrative process of oral rejections. Requirement 15: [PROCEDURAL/DOCUMENTATION] The requirement sets an administrative pre-condition that the case must be fully investigated before deciding. Requirement 16: [PROCEDURAL/DOCUMENTATION] The requirement directs how a caseworker must assess the application, setting a standard for concrete individual evaluation. Requirement 17: [PROCEDURAL/DOCUMENTATION] The requirement procedurally constrains investigation methods by prohibiting unconsented home visits and forced signatures. Requirement 18: [PROCEDURAL/DOCUMENTATION] The requirement governs the process of user communication by mandating interpreters and prohibiting child interpreters. Requirement 19: [PROCEDURAL/DOCUMENTATION] The requirement outlines the administrative necessity of a written, three-element justification to ensure understanding. Requirement 20: [PROCEDURAL/DOCUMENTATION] The requirement dictates the sequential administrative procedure of providing advance notice and the right to be heard. Requirement 21: [PROCEDURAL/DOCUMENTATION] The requirement dictates a sequential step-by-step process, requiring the assessment of qualification program rights before setting activity conditions. Requirement 22: [PROCEDURAL/DOCUMENTATION] The

requirement mandates an administrative processing speed standard (preferably same day) for emergency applications. Requirement 23: [PROCEDURAL/DOCUMENTATION] The requirement governs casework methodology, mandating an active role in the mapping process. Requirement 24: [PROCEDURAL/DOCUMENTATION] The requirement dictates what specific administrative scheduling details (time appointment or deadline) must be included in an approval decision.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: REQUIREMENT 1 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.2 (DOC-REQ-41.1) Nature of Procedural Requirement: The Nav office must document oral applications. Legal Gap: The duty to record oral applications is not explicitly mentioned in § 41 or the Public Administration Act, but is only a practical consequence of the duty to investigate and archive. Thematic Category: [DOC-REQ]

Requirement Reference: 2 Finding Reference: REQUIREMENT 2 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.3 (DOC-REQ-41.2) Nature of Procedural Requirement: All case information must always be in writing. Legal Gap: Section 17 of the Public Administration Act requires proper clarification of the case, but does not establish an absolute formal requirement that all information must always be in writing. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: REQUIREMENT 3 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.4 (DOC-REQ-41.3) Nature of Procedural Requirement: Decisions made must be justified. Legal Gap: None — the requirement is fully grounded in the law as § 41 classifies the decisions as individual decisions, which are subject to the justification duty in § 24 of the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: REQUIREMENT 4 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.4 (DOC-REQ-41.4) Nature of Procedural Requirement: The justification must be written and contain three specific elements regarding rules, facts, and main considerations. Legal Gap: None — the requirement mirrors the content specifications for justifications outlined in § 25 of the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: REQUIREMENT 5 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.5 (DOC-REQ-41.5) Nature of Procedural Requirement: Consent declarations must clearly state that consent is given, what it entails, and its duration. Legal Gap: The Public Administration Act regulates confidentiality and the obtaining of consent but sets no explicit formal requirements for the content and duration of the consent declaration. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: REQUIREMENT 6 of 24 Circular/Source: R-35, § 41, avsnitt 5.41.2.5 (DOC-REQ-41.6) Nature of Procedural Requirement: The Nav office bears the burden of proof to show consent exists, and it should therefore be in a written declaration. Legal Gap: The Public Administration Act contains no explicit rule placing the burden of proof for the existence of consent on the Nav office. Thematic Category: [ASSESS-PROC]

Requirement Reference: 7 Finding Reference: REQUIREMENT 7 of 24 Circular/Source: Barnets beste – veileder (DOC-REQ-41.7) Nature of Procedural Requirement: A special written justification is required when choosing a result that overrides the child's best interests. Legal Gap: Section 41 incorporates the Public Administration Act but does not mention the child's best interests or provide a basis for materially differentiated justification requirements. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: REQUIREMENT 8 of 24 Circular/Source: Barnets beste – veileder (DOC-REQ-41.8) Nature of Procedural Requirement: The assessments of the child's best interests must be documented for verifiability. Legal Gap: The child-specific requirement to verifiably document child's best interests assessments requires basis in the Social Services Act § 4 or child rights principles, and cannot be derived solely from § 41. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: REQUIREMENT 9 of 24 Circular/Source: Nasjonal veileder for samarbeid mellom kriminalomsorgen og Nav (DOC-REQ-41.9) Nature of Procedural Requirement: The office is responsible for archiving and journalizing consent in its own journal system. Legal Gap: The Public Administration Act and § 41 contain no specific rules on archiving and journalizing consent; these duties rest primarily on the Archives Act. Thematic Category: [DOC-REQ]

Requirement Reference: 10 Finding Reference: REQUIREMENT 10 of 24 Circular/Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-41.10) Nature of Procedural Requirement: Oral applications must be recorded, minimally in the form of a note. Legal Gap: Specifying a minimum form (such as "in a note") for recording oral applications is a practical elaboration not explicitly found in the wording of § 41 or the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 11 Finding Reference: REQUIREMENT 11 of 24 Circular/Source: Veileder om økonomisk stønad etter sosialtjenesteloven (DOC-REQ-41.11) Nature of Procedural Requirement: Oral requests must be written down in a journal note by the NAV office. Legal Gap: The specific documentation form of a "journal note" does not explicitly follow from § 41 or the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: REQUIREMENT 12 of 24 Circular/Source: Veileder til sosialtjenesteloven § 17 (DOC-REQ-41.12) Nature of Procedural Requirement: A closing note or a closing letter must be written when a service is terminated. Legal Gap: The internal duty to write a note finds no explicit basis in § 41 or the Public Administration Act, though a closing letter to the user is partially supported. Thematic Category: [DOC-REQ]

Requirement Reference: 13 Finding Reference: REQUIREMENT 13 of 24 Circular/Source: R-35, § 41, begynnelse (PROC-REQ-41.1) Nature of Procedural Requirement: The Nav office must provide information and guidance about services, rights, and duties. Legal Gap: None — the requirement directly mirrors the guidance duty in § 11 of the Public Administration Act incorporated via § 41. Thematic Category: [USER-COMM]

Requirement Reference: 14 Finding Reference: REQUIREMENT 14 of 24 Circular/Source: R-35, § 41, begynnelse (PROC-REQ-41.2) Nature of Procedural Requirement: Oral applications must be recorded and applications shall never be rejected verbally. Legal Gap:

None — recording is supported by § 17 of the Public Administration Act, and written rejection is supported by § 27. Thematic Category: [DOC-REQ]

Requirement Reference: 15 Finding Reference: REQUIREMENT 15 of 24 Circular/Source: R-35, § 41, før avgjørelse (PROC-REQ-41.3) Nature of Procedural Requirement: The case must be as well-illuminated as possible before making a decision. Legal Gap: None — this is a direct quotation of the investigation duty in § 17 of the Public Administration Act. Thematic Category: [ASSESS-PROC]

Requirement Reference: 16 Finding Reference: REQUIREMENT 16 of 24 Circular/Source: R-35, § 41, midten (PROC-REQ-41.4) Nature of Procedural Requirement: The individual assessment must be conducted concretely based on the user's needs at the time of application. Legal Gap: Section 41 does not provide explicit basis for the individuality requirement; it stems primarily from the purpose provision of the Social Services Act (§ 1) and its material structure. Thematic Category: [ASSESS-PROC]

Requirement Reference: 17 Finding Reference: REQUIREMENT 17 of 24 Circular/Source: R-35, § 41, midten (PROC-REQ-41.5) Nature of Procedural Requirement: Home visits must never be conducted without consent, and the user cannot be forced to sign a consent declaration. Legal Gap: The absolute prohibitions lack explicit basis in § 41 or the Public Administration Act, springing instead from constitutional and human rights principles. Thematic Category: [ASSESS-PROC]

Requirement Reference: 18 Finding Reference: REQUIREMENT 18 of 24 Circular/Source: R-35, § 41, gjennomgående (PROC-REQ-41.6) Nature of Procedural Requirement: Interpreters must be provided when needed, and children shall never be used in place of an interpreter. Legal Gap: The explicit right to an interpreter and the absolute prohibition against using children as interpreters lack explicit basis in § 41 alone, resting instead on the Interpreter Act and legal policy. Thematic Category: [USER-COMM]

Requirement Reference: 19 Finding Reference: REQUIREMENT 19 of 24 Circular/Source: R-35, § 41, slutten (PROC-REQ-41.7) Nature of Procedural Requirement: Decisions must have a written, three-element justification to ensure understanding. Legal Gap: None — the requirement has a clear basis through § 41's incorporation of §§ 24 and 25 of the Public Administration Act. Thematic Category: [DOC-REQ]

Requirement Reference: 20 Finding Reference: REQUIREMENT 20 of 24 Circular/Source: R-35, § 41, før avgjørelse (PROC-REQ-41.8) Nature of Procedural Requirement: The user must receive advance notice and an opportunity to speak before a final decision on exclusion is made. Legal Gap: None — the rule is anchored in the advance notice requirements of § 16 of the Public Administration Act. Thematic Category: [USER-COMM]

Requirement Reference: 21 Finding Reference: REQUIREMENT 21 of 24 Circular/Source: Kommunebrev (PROC-REQ-41.9) Nature of Procedural Requirement: The right to the qualification program must be evaluated before setting activity conditions. Legal Gap: Section 41 cannot serve as a legal basis for a material sequencing rule between two different benefit regimes, which requires basis in §§ 20 and 29–39. Thematic Category: [SEQUENCE]

Requirement Reference: 22 Finding Reference: REQUIREMENT 22 of 24 Circular/Source: Veileder om økonomisk stønad etter sosialtjenesteloven (PROC-REQ-41.10) Nature of Procedural Requirement: Emergency applications must be processed quickly, preferably on the same day. Legal Gap: The timeframe of "preferably the same day" is stricter than the Public Administration Act's explicit demand of "without undue delay," and the emergency context is primarily regulated by § 27. Thematic Category: [OTHER] (Time-processing requirement)

Requirement Reference: 23 Finding Reference: REQUIREMENT 23 of 24 Circular/Source: Veileder om økonomisk stønad etter sosialtjenesteloven (PROC-REQ-41.11) Nature of Procedural Requirement: The Nav office must actively map out and uncover what the user needs. Legal Gap: None — the requirement for active mapping is a legitimate operationalization of the duty to investigate in § 17 of the Public Administration Act. Thematic Category: [ASSESS-PROC]

Requirement Reference: 24 Finding Reference: REQUIREMENT 24 of 24 Circular/Source: Veileder til sosialtjenesteloven § 17 (PROC-REQ-41.12) Nature of Procedural Requirement: An approval decision must include specific starting times via a concrete appointment or a deadline for the first conversation. Legal Gap: The demand for a specific time designation is more detailed than §§ 24–25 of the Public Administration Act require, and relates primarily to § 17 rather than § 41. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 42)

Requirement: Tjenestetilbudet skal så langt som mulig utformes i samarbeid med tjenestemottaker. Source: R-35, § 5.42 / PROC-REQ 42.1 Requirement: Det skal legges stor vekt på hva vedkommende mener. Source: R-35, § 5.42 / PROC-REQ 42.2 Requirement: Tjenestemottaker skal ut fra sine forutsetninger aktivt gis mulighet til å bidra til å utforme tjenestetilbudet. Source: R-35, § 5.42 / PROC-REQ 42.3 Requirement: Tjenestemottaker skal medvirke og ha innflytelse i hele søknadsprosessen, fra henvendelse, søknad og kartlegging av behov til vedtak og utforming og tilrettelegging av tjenestetilbud. Source: R-35, § 5.42 / PROC-REQ 42.4 Requirement: Nav-kontoret må være tydelig på hva som forventes av tjenestemottaker og hva tjenestemottaker kan forvente av veileder og Nav. Source: R-35, § 5.42 / PROC-REQ 42.5 Requirement: Nav-kontoret må sørge for at tjenestemottaker får mulighet til å legge fram sin situasjon og uttale seg om egen sak ved å skape rom for dialog. Source: R-35, § 5.42 / PROC-REQ 42.6 Requirement: For at medvirkningen skal være reell, må Nav-kontoret holde tjenestemottaker informert gjennom hele søknadsprosessen. Source: R-35, § 5.42 / PROC-REQ 42.7 Requirement: All informasjon skal tilpasses tjenestemottakers forutsetninger. Source: R-35, § 5.42 /

PROC-REQ 42.8 Requirement: Nav-veileder må forsikre seg om at begge parter har en felles forståelse av den informasjonen som utveksles og sakens innhold. Source: R-35, § 5.42 / PROC-REQ 42.9 Requirement: Tjenestemottakers barn skal aldri brukes i stedet for tolk. Source: R-35, § 5.42 / PROC-REQ 42.10 Requirement: Hvis tjenestetilbudet... omfatter flere tjenestemottakere, må Nav-kontoret sørge for at begge gis relevant informasjon og anledning til å uttale seg. Source: R-35, § 5.42 / PROC-REQ 42.11 Requirement: Hvis barn er berørte av tjenestetilbudet, skal deres behov og eventuelle synspunkter som hovedregel fremmes gjennom foreldre og foresatte. Source: R-35, § 5.42 / PROC-REQ 42.12 Requirement: For tjenestemottakere med spesielle behov, kan det være aktuelt å tilrettelegge for medvirkning ved å møte vedkommende utenfor Nav-kontoret... Source: R-35, § 5.42 / PROC-REQ 42.13 Requirement: Kontoret skal i alle vurderinger legge stor vekt på hva tjenestemottaker mener og ønsker, hvis dette er innenfor lovens formål og rammer. Source: R-35, § 5.42 / PROC-REQ 42.14 Requirement: Hvis tjenestetilbudet ikke er i samsvar med tjenestemottakers ønsker, skjerpes kravet til at beslutningen begrunnes på en måte som er forståelig for vedkommende. Source: R-35, § 5.42 / PROC-REQ 42.15 / DOC-REQ 42.2 Requirement: Fullmektigen må, i motsetning til en advokat, legge frem skriftlig fullmakt fra tjenestemottaker. Source: R-35, § 5.42.2 / DOC-REQ 42.1 Requirement: Brukermedvirkning er sentral i kartleggingsprosessen, og NAV-kontoret bør derfor undersøke hva brukeren selv mener at vedkommende har behov for. Source: Veileder til sosialtjenesteloven (øk. stønad) / PROC-REQ 42.16 Requirement: Det er den enkelte bruker som kjenner sitt behov best... NAV-kontoret bør derfor legge vekt på hva brukeren selv opplever at vedkommende trenger. Source: Veileder til sosialtjenesteloven (øk. stønad) / PROC-REQ 42.17 Requirement: Det er også en forutsetning for god oppfølging at NAV-veilederen kartlegger brukerens helhetlige situasjon, og aktivt spør om for eksempel hjemmesituasjon, omsorgsoppgaver, helse, fritid, boligforhold og økonomi. Source: Veiviser til midlertidig botilbud / PROC-REQ 42.18 Requirement: Brukeren skal medvirke og ha innflytelse i hele søknadsprosessen, fra henvendelse, søknad og kartlegging av behov til vedtak og utforming og tilrettelegging av tjenesten. Source: Veileder til sosialtjenesteloven § 17 / PROC-REQ 42.19 Requirement: Eierne har et ansvar for å sikre at det arbeides med brukermedvirkning på individ- og systemnivå. Source: Partnerskapsavtalen / PROC-REQ 42.20 Requirement: Nav-kontoret har plikt til å nedtegne muntlige søknader. Når brukeren gir uttrykk for et behov for tjenesten, er dette å regne som en muntlig søknad. Det er ikke nødvendig at nedtegnelsen skjer ved å fylle ut et søknadsskjema; det holder at søknaden fremgår av saken, som i et notat. Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ 42.3 Requirement: Et uttrykkelig samtykke innebærer at personen må ha gjort noe aktivt for å gi sitt samtykke, og samtykke bør gis skriftlig. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / DOC-REQ 42.4 Requirement: Dersom rådgiveren skal innhente dokumentasjon, må bruker gi rådgiveren fullmakt til dette. Source: Veileder for økonomisk rådgivning / DOC-REQ 42.5

Step 2 — Classify Each Requirement

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] This requirement establishes the core statutory duty dictating the legal standard that the service offer must be designed in collaboration with the user. → noted here, do not proceed to Step 3. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] This requirement dictates the statutory legal

threshold establishing that great weight must be attached to the user's views. → noted here, do not proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative sub-obligation of how the caseworker must specifically and actively facilitate the user's contribution. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative process spanning chronologically from first contact to decision making, expanding procedural steps beyond the statute's scope. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates how administrative communication must be structured regarding the clarification of mutual expectations between the office and the user. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative form of casework by demanding the creation of space for dialogue so the user can present their situation. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates a continuous administrative communication procedure to keep the user informed across the entire application process. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the procedural standard for how all information and communication must be structured and adapted. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates a specific procedural verification step caseworkers must follow to ensure mutual understanding during communication. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates an administrative process rule explicitly prohibiting who can be used to assist with interpretation during communication. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates specific procedural steps for providing information and securing hearing rights in multi-party situations. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the specific procedural channel indicating how children's views are to be conveyed as a general administrative rule. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates a permissive administrative option regarding how the physical meeting process can be structured for users with special needs. → proceed to Step 3. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] This requirement extends the substantive legal standard of applying "great weight" to the user's views across all assessments universally. → noted here, do not proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates how an administrative decision must be documented and formally reasoned if it diverges from the user's wishes. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative form and case documentation (written proxy) required for external representation. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the evaluation procedure a caseworker should follow to investigate what the user perceives as their need. → proceed to Step 3. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] This requirement dictates the substantive standard of weight that should be applied to the user's self-perceived needs when determining an outcome. → noted here, do not proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates specific assessment steps involving an enumerated checklist of life domains the caseworker must investigate. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the step-by-step procedural scope for user involvement throughout the entire application process. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review; this

requirement concerns systemic institutional governance at the ownership level rather than individual case processing procedures. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the record-keeping and administrative registration procedure for documenting oral applications. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative form and documentation standard (written) required for securing user consent. → proceed to Step 3. Requirement: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative documentation procedure required for financial advisors to obtain authorization (power of attorney) to collect external information. → proceed to Step 3.

Step 3 — Structured Entry

Requirement Reference: Finding Reference: REQUIREMENT R3 Circular/Source: R-35, § 5.42 / PROC-REQ 42.3 Nature of Procedural Requirement: The caseworker must actively facilitate the user's opportunity to contribute to the service offer based on their conditions. Legal Gap: The statute mandates collaboration qualified by "so far as possible," whereas the circular mandates a specific active facilitation procedure not present in the text, converting an open duty into a fixed obligation. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R4 Circular/Source: R-35, § 5.42 / PROC-REQ 42.4 Nature of Procedural Requirement: The caseworker must allow the user to participate and influence the entire application process, from initial contact to the final decision. Legal Gap: The statute limits collaboration to the service design phase, whereas the circular extends this temporal scope to initial contact and adds a right of influence without textual authority. Thematic Category: [SEQUENCE]

Requirement Reference: Finding Reference: REQUIREMENT R5 Circular/Source: R-35, § 5.42 / PROC-REQ 42.5 Nature of Procedural Requirement: The office must clearly communicate to the user what is expected of them and what they can expect from the office. Legal Gap: The statute leaves how collaboration is structured entirely open, whereas the circular imposes a specific communicative sub-obligation with no explicit anchor in the law. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R6 Circular/Source: R-35, § 5.42 / PROC-REQ 42.6 Nature of Procedural Requirement: The office must create space for dialogue to give the user the opportunity to present their situation and speak to their case. Legal Gap: The statute grants open judgment on the method of collaboration, whereas the circular mandates a specific procedural form ("create space for dialogue") and user rights, removing the law's flexibility qualifier. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R7 Circular/Source: R-35, § 5.42 / PROC-REQ 42.7 Nature of Procedural Requirement: The office must continuously keep the user informed throughout the entire application process. Legal Gap: The statute imposes a flexible, context-limited duty anchored to service design, whereas the circular imposes a continuous, mandatory information obligation spanning the whole process. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R8 Circular/Source: R-35, § 5.42 / PROC-REQ 42.8 Nature of Procedural Requirement: The caseworker must adapt all information to the user's specific conditions. Legal Gap: The statute uses a qualified standard allowing calibrated collaboration, whereas the circular imposes an absolute, unqualified rule covering all communications, eliminating preserved flexibility. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R9 Circular/Source: R-35, § 5.42 / PROC-REQ 42.9 Nature of Procedural Requirement: The caseworker must actively verify that both parties have a mutual understanding of the information exchanged and the case content. Legal Gap: The statute leaves the collaboration procedure open, whereas the circular imposes a specific mandatory verification step (mutual comprehension check) as a standalone duty not required by the law. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R10 Circular/Source: R-35, § 5.42 / PROC-REQ 42.10 Nature of Procedural Requirement: The caseworker must absolutely never use the user's children as interpreters. Legal Gap: The statute preserves judgment on how communication is organized, whereas the circular operates as an absolute prohibition that entirely forecloses one option within the authority's open discretion, lacking a statutory foundation in § 42. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R11 Circular/Source: R-35, § 5.42 / PROC-REQ 42.11 Nature of Procedural Requirement: The office must provide all relevant parties with information and the opportunity to speak in multi-party situations. Legal Gap: The statute leaves collaboration in multi-party situations entirely open and qualified, whereas the circular mandates specific procedural steps without any flexibility qualifier. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R12 Circular/Source: R-35, § 5.42 / PROC-REQ 42.12 Nature of Procedural Requirement: The office must generally channel the needs and views of affected children through their parents or guardians. Legal Gap: The statute makes no reference to children or how their views are conveyed, whereas the circular imposes a specific procedural channel as the mandatory default rule. Thematic Category: [USER-COMM]

Requirement Reference: Finding Reference: REQUIREMENT R13 Circular/Source: R-35, § 5.42 / PROC-REQ 42.13 Nature of Procedural Requirement: The office may consider facilitating participation for users with special needs by arranging meetings outside the office. Legal Gap: The finding establishes no legal gap; the circular uses permissive language ("kan det være aktuelt") that remains consistent with the statutory flexibility. Thematic Category: [OTHER] (Procedural suggestion rather than a rigid mandate)

Requirement Reference: Finding Reference: REQUIREMENT R15 Circular/Source: R-35, § 5.42 / PROC-REQ 42.15 / DOC-REQ 42.2 Nature of Procedural Requirement: The caseworker must provide heightened, understandable justification for the decision if the service offer diverges from the user's wishes. Legal Gap: The finding establishes no direct restriction on the input discretion; the rule merely acts as a procedural consequence attached to the outcome, which possesses arguable support from general administrative duties. Thematic Category: [DOC-REQ]

Requirement Reference: Finding Reference: REQUIREMENT R16 Circular/Source: R-35, § 5.42.2 / DOC-REQ 42.1 Nature of Procedural Requirement: The caseworker must demand a written power of attorney from a fullmektig (proxy) acting on behalf of the user. Legal Gap: Section 42 does not authorize or regulate proxy representation; this is a categorization gap as the rule properly derives from a separate procedural domain governed by fvl. § 12. Thematic Category: [DOC-REQ]

Requirement Reference: Finding Reference: REQUIREMENT R17 Circular/Source: Veileder til sosialtjenesteloven (øk. stønad) / PROC-REQ 42.16 Nature of Procedural Requirement: The office should investigate what the user themselves perceives as their need during the mapping process. Legal Gap: The finding establishes no gap; this procedural suggestion acts as natural implementation guidance and is entirely consistent with the statutory standard. Thematic Category: [ASSESS-PROC]

Requirement Reference: Finding Reference: REQUIREMENT R19 Circular/Source: Veiviser til midlertidig botilbud / PROC-REQ 42.18 Nature of Procedural Requirement: The caseworker must actively ask about specific life domains such as home situation, care tasks, health, leisure, housing, and finances as a prerequisite for follow-up. Legal Gap: The statute provides an open-ended collaboration duty, whereas the circular imposes an enumerated checklist of life domains as a mandatory comprehensive prerequisite lacking textual authority. Thematic Category: [ASSESS-PROC]

Requirement Reference: Finding Reference: REQUIREMENT R20 Circular/Source: Veileder til sosialtjenesteloven § 17 / PROC-REQ 42.19 Nature of Procedural Requirement: The caseworker must ensure the user has participation and influence throughout the entire application process, from first contact to the final decision. Legal Gap: The statute anchors the qualified collaboration duty exclusively to service design, whereas the circular converts it into an absolute right stretching across the entire process, adding a right to influence. Thematic Category: [SEQUENCE]

Requirement Reference: Finding Reference: REQUIREMENT R21 Circular/Source: Partnerskapsavtalen / PROC-REQ 42.20 Nature of Procedural Requirement: The owners must ensure that user participation is addressed structurally on both an individual and system level. Legal Gap: Section 42 concerns individual case processing rights, whereas the requirement dictates institutional governance obligations derived structurally from NAV-loven § 6. Thematic Category: [OTHER] (Systemic governance obligation)

Requirement Reference: Finding Reference: REQUIREMENT R22 Circular/Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ 42.3 Nature of Procedural Requirement: The office must formally record oral applications (e.g., via a note) whenever the user expresses a need for a service. Legal Gap: Section 42 imposes no obligation regarding the recording of oral applications; the procedural duty derives from unrelated general case management obligations and fvl. § 11a. Thematic Category: [DOC-REQ]

Requirement Reference: Finding Reference: REQUIREMENT R23 Circular/Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret / DOC-REQ 42.4 Nature of Procedural Requirement: The caseworker should obtain consent in a written format when inter-agency explicit consent is required. Legal Gap: Section 42 contains no

provisions concerning consent documentation; the requirement inherently derives from specific consent law principles outside § 42. Thematic Category: [DOC-REQ]

Requirement Reference: Finding Reference: REQUIREMENT R24 Circular/Source: Veileder for økonomisk rådgivning / DOC-REQ 42.5 Nature of Procedural Requirement: A financial advisor must obtain authorization via a power of attorney from the user to legally collect documentation. Legal Gap: Section 42 has no provision regulating powers of attorney in financial guidance; the rule constitutes a separate procedural domain governed by fvl. § 12 representation principles. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 43)

Requirement: Opplysninger skal så langt som mulig innhentes i samarbeid med tjenestemottaker eller slik at vedkommende har kjennskap til innhentingen. Source: R-35 § 43 / PROC-REQ-43.1

Requirement: Nav-kontoret skal sikre at saken er så godt opplyst som mulig før det treffes en avgjørelse om tjenester etter loven. Source: R-35 § 43 / PROC-REQ-43.2

Requirement: Det må foreligge opplysninger i saken som dokumenterer om tjenestemottaker har et hjelpebehov eller ikke. Source: R-35 § 43 / PROC-REQ-43.3

Requirement: Det må også foreligge opplysninger som dokumenterer oppholdsstatus, og eventuelt om personen har fast bopel i Norge. Source: R-35 § 43 / PROC-REQ-43.4

Requirement: Hvis Nav-kontoret skal innhente opplysningene, skal dette som hovedregel skje etter samtykke fra vedkommende. Source: R-35 § 43 / PROC-REQ-43.5

Requirement: Hvilke opplysninger som skal fremskaffes i den enkelte sak må alltid vurderes individuelt ut fra tjenestemottakers situasjon og konkret i forhold til tjenesten det søkes om. Source: R-35 § 43 / PROC-REQ-43.6

Requirement: ...det skal ikke innhentes flere opplysninger enn nødvendig. Source: R-35 § 43 / PROC-REQ-43.7

Requirement: Kontoutskrift kan derfor ikke kreves fremlagt rutinemessig. Source: R-35 § 43 / PROC-REQ-43.8

Requirement: Tjenestemottaker skal gis anledning til å stryke over opplysninger som ikke er nødvendige for saken før kontoutskriften leveres til Nav-kontoret. Source: R-35 § 43 / PROC-REQ-43.9

Requirement: Opplysningene i saken skal foreligge skriftlig, enten dette er i form av innhentede dokumenter eller nedtegnelser i søknad eller øvrige saksdokumenter. Source: R-35 § 43 / PROC-REQ-43.10

Requirement: Hvis tjenestemottaker ikke fremlegger dokumentasjonen som etterspørres... skal Nav-kontoret likevel vurdere tjenestemottakers behov med bakgrunn i sannsynligheten av opplysningene som er gitt. Source: R-35 § 43 / PROC-REQ-43.11

Requirement: Muntlige opplysninger som Nav-kontoret innhenter, for eksempel fra samarbeidspartnere, skal dokumenteres ved nedtegnelse i saken. Source: R-35 § 43 / PROC-REQ-43.12

Requirement: Tjenestemottaker skal være informert om, og ha forstått, hvilke opplysninger som er nødvendige for å avgjøre saken. Source: R-35 § 43 / PROC-REQ-43.13

Requirement: Nav-kontoret har ikke anledning til å sette vilkår om, eller på annen måte utøve press for, at tjenestemottaker skal undertegne samtykkeerklæring. Source: R-35 § 43 / PROC-REQ-43.14

Requirement: Det skal aldri innhentes opplysninger fra private institusjoner eller personer som ikke utfører oppgaver for det offentlige uten tjenestemottakers samtykke. Source: R-35 § 43 / PROC-REQ-43.15

Requirement: NAV-kontoret må være aktive i kartleggingsprosessen slik at man får avdekket hva brukeren har behov for. Source: Veileder om økonomisk stønad / PROC-REQ-43.16

Requirement: NAV-kontoret bør innledningsvis i kartleggingen søke å avklare hvor lenge brukeren vil ha behov for hjelp fra NAV. Source: Veileder om økonomisk stønad / PROC-REQ-43.17

Requirement: Hvis henvendelsen gjelder hjelp i en nødsituasjon, må søknaden vurderes raskt, helst samme dag. Source: Veileder om økonomisk stønad / PROC-REQ-43.18

Requirement: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste — veileder / PROC-REQ-43.19

Requirement: Direktoratet oppfordrer derfor kommunen til å arbeide med å tydeliggjøre hvordan barnets beste-vurderinger skal brukes i saksbehandlingen.... Source: Kommunebrev 2025 / PROC-REQ-43.20

Requirement: Hovedregelen er at opplysningene som er nødvendige for saken skal være skriftlige i form av innhentede dokumenter, som lønnsslipp, husleiekontrakt, saldoutskrift og likning. Source: R-35 § 43 / DOC-REQ-43.4

Requirement: Noen opplysninger som tjenestemottaker gir krever ikke ytterligere dokumentasjon enn nedtegnelse i saksdokumentene, fordi det uten videre bør legges til grunn at opplysningene er riktige. Source: R-35 § 43 / DOC-REQ-43.5

Requirement: Det er også tilstrekkelig at opplysninger som det er umulig eller urimelig vanskelig å fremskaffe dokumentasjonen på, nedtegnes i saksdokumentene. Source: R-35 § 43 / DOC-REQ-43.6

Requirement: Tjenestemottaker som er i stand til å ivareta sine interesser, skal som hovedregel selv fremskaffe og dokumentere opplysningene som er nødvendige for at Nav-kontoret skal kunne vurdere vedkommendes behov for tjenesten det søkes om. Source: R-35 § 43 / DOC-REQ-43.8

Requirement: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. Source: Barnets beste — veileder / DOC-REQ-43.10

Requirement: NAV-kontoret må gjøre en konkret og individuell vurdering av hvordan opplysningene skal dokumenteres. Source: Veileder om økonomisk stønad / DOC-REQ-43.11

Requirement: Nav-kontoret har plikt til å nedtegne muntlige søknader. Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ-43.12

Step 2 — Classify Each Requirement

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding identifies this as the procedural framework dictating what form of collaboration or user awareness must be pursued during information gathering.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this relates to the administrative duty to ensure adequate investigation of the case file before making a decision.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding analyzes this as an evidentiary threshold regarding what substantive content must be present in the case file documentation. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding specifies this establishes a procedural documentary obligation concerning case-file content for residency status. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as managing the procedural consent framework for information gathering.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding characterizes this as dictating the administrative methodology and standardized versus individual criteria for deciding what information to gather.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes this establishes a procedural ceiling on the amount of information the caseworker is permitted to gather. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as a procedural restriction on making routine demands for a specific document type. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding explicitly calls this a "specific procedural step" concerning user redaction rights before submitting documents.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding defines this as dictating the written form that case file documentation must take. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding categorizes this as "assessment methodology" dictating how to evaluate missing documentation in case processing.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding frames this as dictating how information gathered from third parties must be recorded in the file. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding analyzes this as dictating the active communication and verification procedures required for user awareness. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this governs how the authority manages the consent procedure without applying pressure. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as a procedural limit on the scope of the authority's ability to demand information from private parties.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding states this operationalizes the active procedural role required during the mapping process.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding calls this a "case management best-practice recommendation" addressing the mapping process sequence. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding explicitly refers to this as introducing a specific time-bounded "special procedural rule" for emergency assessments.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding describes this as an obligation to formally document specific assessments within saksbehandling. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding observes that this relates to administrative best practice and institutional development of how assessments are used in saksbehandling. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding indicates this prescribes both the mandatory written form and the specific types of physical documents to be gathered.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding determines this establishes differentiated procedural documentation thresholds for user-provided information. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding categorizes this as a procedural accommodation rule for recording information when physical documentation is impossible.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding classifies this as a procedural allocation of the primary responsibility for information gathering.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes this dictates the form, tone, and content of recorded file notes regarding children. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding outlines this as a mandate controlling the methodology for documenting gathered information. Ambiguous — recommend human legal review.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] Justification: The finding frames this as an administrative duty governing the reception and recording of applications. Ambiguous — recommend human legal review.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: 1 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.1 Nature of Procedural Requirement: Requires information to be gathered collaboratively or in a manner ensuring the user is aware of the collection. Legal Gap: No gap is established; the finding states the circular verbatim reproduces the statutory text's open qualifier without escalation. Thematic Category: [USER-COMM]

Requirement Reference: 2 Finding Reference: 2 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.2 Nature of Procedural Requirement: Mandates that the office ensures the case is adequately investigated and enlightened before a decision is made. Legal Gap: No gap is established; the requirement directly operationalizes the general administrative duty found in fvl. § 17. Thematic Category: [ASSESS-PROC]

Requirement Reference: 3 Finding Reference: 3 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.3 Nature of Procedural Requirement: Requires the case file to contain documented information establishing whether the user needs assistance. Legal Gap: The law strictly regulates how information is gathered but does not specify the substantive content or exact documentation of "hjelpebehov" that must exist in the file. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: 4 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.4 Nature of Procedural Requirement: Mandates that the case file contains documented information regarding residency status and fixed domicile in Norway. Legal Gap: The law neither requires documentation of oppholdsstatus nor specifies residence-based evidentiary thresholds. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: 5 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.5 Nature of Procedural Requirement: Establishes that if the office gathers information, it must be done with the user's consent as a primary rule. Legal Gap: No gap is established; the law's clear framework regarding voluntary consent implicitly authorizes this requirement. Thematic Category: [USER-COMM]

Requirement Reference: 6 Finding Reference: 6 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.6 Nature of Procedural Requirement: Mandates an individualized assessment of what information must be gathered based specifically on the user's situation and requested service. Legal Gap: The circular converts the law's permissive discretion over information gathering into a mandatory individualized assessment, eliminating the authority's freedom to use standardized intake criteria. Thematic Category: [ASSESS-PROC]

Requirement Reference: 7 Finding Reference: 7 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.7 Nature of Procedural Requirement: Prohibits gathering more information than is necessary for the case. Legal Gap: The law itself does not contain an explicit data minimization requirement. Thematic Category: [ASSESS-PROC]

Requirement Reference: 8 Finding Reference: 8 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.8 Nature of Procedural Requirement: Prohibits the routine demand for submission of bank statements. Legal Gap: The law authorizes requesting information but contains no specific restriction on demanding routine bank statements. Thematic Category: [DOC-REQ]

Requirement Reference: 9 Finding Reference: 9 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.9 Nature of Procedural Requirement: Requires providing the user with an opportunity to redact unnecessary information from bank statements before submission. Legal Gap: The law establishes a general collaborative approach but contains no authorization for, or reference to, a specific pre-submission document redaction right. Thematic Category: [USER-COMM]

Requirement Reference: 10 Finding Reference: 10 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.10 Nature of Procedural Requirement: Mandates that gathered information must be in writing, whether via collected documents or recorded notes. Legal Gap: The law explicitly regulates the collection process itself, but not the physical or written form of the resulting case file documentation. Thematic Category: [DOC-REQ]

Requirement Reference: 11 Finding Reference: 11 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.11 Nature of Procedural Requirement: Requires the caseworker to assess the user's needs based on the probability of provided information when required documentation is missing. Legal Gap: No gap is established; the requirement correctly specifies a probability assessment methodology that operationalizes the mandatory investigation duty. Thematic Category: [ASSESS-PROC]

Requirement Reference: 12 Finding Reference: 12 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.12 Nature of Procedural Requirement: Mandates that oral information gathered from third parties must be documented through written notation in the file. Legal Gap: The law authorizes gathering information but provides nothing explicitly regarding how to format or record oral information. Thematic Category: [DOC-REQ]

Requirement Reference: 13 Finding Reference: 13 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.13 Nature of Procedural Requirement: Requires ensuring the user is actively informed about, and has understood, what specific information is necessary to decide their case. Legal Gap: The law only requires passive "awareness" of gathering, whereas the circular escalates this by mandating active informing and verified user comprehension. Thematic Category: [USER-COMM]

Requirement Reference: 14 Finding Reference: 14 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.14 Nature of Procedural Requirement: Prohibits setting conditions or applying pressure on a user to sign a consent declaration. Legal Gap: The law implies voluntary consent through its framework, but the specific prohibition on applying pressure or conditions is not textually grounded in the statute. Thematic Category: [USER-COMM]

Requirement Reference: 15 Finding Reference: 15 av 27 Circular/Source: R-35 § 43 / PROC-REQ-43.15 Nature of Procedural Requirement: Completely prohibits gathering information from private parties (who do not perform public functions) without user consent. Legal Gap: No gap is established; purely private parties are entirely excluded from the scope of the statutory permissive authority. Thematic Category: [ASSESS-PROC]

Requirement Reference: 16 Finding Reference: 16 av 27 Circular/Source: Veileder om økonomisk stønad / PROC-REQ-43.16 Nature of Procedural Requirement: Requires caseworkers to take an active role during the mapping process to uncover the user's actual needs. Legal Gap: No gap is established; the directive to be active correctly operationalizes the existing mandatory administrative investigation duty. Thematic Category: [ASSESS-PROC]

Requirement Reference: 17 Finding Reference: 17 av 27 Circular/Source: Veileder om økonomisk stønad / PROC-REQ-43.17 Nature of Procedural Requirement: Recommends that caseworkers attempt to clarify the expected duration of the user's assistance needs early in the mapping phase. Legal Gap: The law does not specify the sequence or content of the mapping process, nor does it require early clarification of need duration. Thematic Category: [ASSESS-PROC]

Requirement Reference: 18 Finding Reference: 18 av 27 Circular/Source: Veileder om økonomisk stønad / PROC-REQ-43.18 Nature of Procedural Requirement: Mandates that emergency applications be assessed quickly, preferably on the same day. Legal Gap: The

law contains no emergency clause, processing timeline, or special procedural rule for acute situations. Thematic Category: [SEQUENCE]

Requirement Reference: 19 Finding Reference: 19 av 27 Circular/Source: Barnets beste — veileder / PROC-REQ-43.19 Nature of Procedural Requirement: Requires documenting assessments regarding the "best interests of the child" to allow for future verification. Legal Gap: The law explicitly lacks any provision authorizing or requiring documentation of the "best interests of the child" assessment. Thematic Category: [DOC-REQ]

Requirement Reference: 20 Finding Reference: 20 av 27 Circular/Source: Kommunebrev 2025 / PROC-REQ-43.20 Nature of Procedural Requirement: Encourages municipalities to explicitly outline how "best interests of the child" assessments should be utilized in casework practice. Legal Gap: The law provides no textual basis for this institutional development recommendation. Thematic Category: [OTHER] (Institutional capability building and internal policy development requirement)

Requirement Reference: 21 Finding Reference: 21 av 27 Circular/Source: R-35 § 43 / DOC-REQ-43.4 Nature of Procedural Requirement: Mandates as a main rule that necessary information be in writing and establishes specific recognized physical document types (e.g., payslips, leases). Legal Gap: The law authorizes requesting information but fails to specify the required form of that information or enumerate specifically named document types. Thematic Category: [DOC-REQ]

Requirement Reference: 22 Finding Reference: 22 av 27 Circular/Source: R-35 § 43 / DOC-REQ-43.5 Nature of Procedural Requirement: Stipulates that certain user-provided information does not require extensive documentation beyond file notes, assuming its correctness. Legal Gap: The law does not explicitly establish differentiated procedural or evidentiary documentation thresholds based on the type of personal information provided. Thematic Category: [DOC-REQ]

Requirement Reference: 23 Finding Reference: 23 av 27 Circular/Source: R-35 § 43 / DOC-REQ-43.6 Nature of Procedural Requirement: Establishes that case file notation is sufficient when securing physical documentation is impossible or unreasonably difficult. Legal Gap: No gap is established; the circular merely applies the law's own "as far as possible" qualifier directly to documentation realities. Thematic Category: [DOC-REQ]

Requirement Reference: 24 Finding Reference: 24 av 27 Circular/Source: R-35 § 43 / DOC-REQ-43.8 Nature of Procedural Requirement: Dictates that capable users have the primary responsibility to procure and submit their own necessary documentation. Legal Gap: No gap is established; this allocation of procedural responsibility is directly rooted in the statutory preparatory works. Thematic Category: [ASSESS-PROC]

Requirement Reference: 25 Finding Reference: 25 av 27 Circular/Source: Barnets beste — veileder / DOC-REQ-43.10 Nature of Procedural Requirement: Directs that file recordings concerning children must be neutrally descriptive and limited only to what is strictly necessary. Legal Gap: The law entirely fails to address the form or content restrictions of how child-related information must be documented. Thematic Category: [DOC-REQ]

Requirement Reference: 26 Finding Reference: 26 av 27 Circular/Source: Veileder om økonomisk stønad / DOC-REQ-43.11 Nature of Procedural Requirement: Demands that the office perform a concrete, individual assessment specifically regarding how information will be documented. Legal Gap: The law provides no methodology for documenting gathered information, yet the circular escalates by mandating an individualized assessment of the documentation method itself. Thematic Category: [DOC-REQ]

Requirement Reference: 27 Finding Reference: 27 av 27 Circular/Source: Veileder til sosialtjenesteloven § 17 / DOC-REQ-43.12 Nature of Procedural Requirement: Imposes an administrative duty to formally record oral applications. Legal Gap: The specific law in question does not address or mandate the recording of oral applications. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 43 a)

Requirement 1: Kommunen, statsforvalteren, Statens helsetilsyn og Arbeids- og velferdsdirektoratet kan behandle personopplysninger, herunder personopplysninger som nevnt i personvernforordningen artikkel 9 og 10, når dette er nødvendig for utførelsen av oppgaver etter loven her. **Source:** PROC-REQ 43a.1 (R-35 para 5.43a.1).

Requirement 2: All behandling av personopplysninger må ha et rettslig grunnlag for å være lovlig etter personvernforordningen. **Source:** PROC-REQ 43a.2 (R-35 para 5.43a.1).

Requirement 3: Artikkel 6 nr. 3 krever da at behandlingen har et supplerende rettsgrunnlag i nasjonal rett. **Source:** PROC-REQ 43a.3 (R-35 para 5.43a.1).

Requirement 4: Dette inkluderer blant annet at vi bør ha et særlig fokus på å begrense opplysninger vi lagrer om enkeltbarn... **Source:** PROC-REQ 43a.4 (Barnets beste — veileder).

Requirement 5: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. **Source:** PROC-REQ 43a.5 / DOC-REQ 5.43a.2 (Barnets beste — veileder).

Requirement 6: Når det skal dokumenteres i enkeltsaker, er det viktig at fagsystemene brukes på en måte som ivaretar barnets rett til personvern. **Source:** DOC-REQ 5.43a.1 (Barnets beste — veileder).

Requirement 7: Et samtykke skal være frivillig, spesifikt, informert, gitt utvetydig gjennom aktiv handling og bør være skriftlig. **Source:** PROC-REQ 43a.6 (Samarbeid kriminalomsorgen — NAV).

Requirement 8: For å kunne gi taushetsbelagte opplysninger videre, må det foreligge en lovhjemmel eller et samtykke som tillater det. **Source:** PROC-REQ 43a.7 (Samarbeid barnevern — NAV).

Requirement 9: Selv om det er hjemmel for å utveksle opplysninger uten samtykke, bør det alltid først bes om samtykke... **Source:** PROC-REQ 43a.8 (Samarbeid barnevern — NAV).

Requirement 10: Hvis Nav-kontoret skal innhente opplysninger på vegne av brukeren, må det foreligge et samtykke fra vedkommende før innhentingen. **Source:** PROC-REQ 43a.9 (Veileder sosialtjenesteloven § 17).

Requirement 11: Det må gjøres en konkret vurdering av om opplysninger skal utleveres til andre forvaltningsorganer. **Source:** PROC-REQ 43a.10 (Samarbeid kriminalomsorgen — NAV).

Requirement 12: Dersom en av de to eierne stiller strengere krav til sikkerhet... må NAV-leder sørge for at disse kravene blir tatt hensyn til. **Source:** PROC-REQ 43a.11 (Veileder partnerskapsavtalen).

Requirement 13: Det må foreligge opplysninger i saken som dokumenterer om søker har et hjelpebehov eller ikke. NAV-kontoret må gjøre en konkret og individuell vurdering av hvordan opplysningene skal dokumenteres. **Source:** DOC-REQ 5.43a.5 (Veileder om økonomisk stønad).

Requirement 14: Nav-kontoret har plikt til å nedtegne muntlige søknader. [...] det holder at søknaden fremgår av saken, som i et notat. Søknadstidspunktet vil være tidspunktet for innlevering av en skriftlig søknad eller når behovet ble meldt, og dette tidspunktet skal fremgå av saken. **Source:** DOC-REQ 5.43a.6 (Veileder til sosialtjenesteloven § 17).

Requirement 15: Dersom en mindreårig søker om tjenesten opplysning, råd og veiledning må Nav-kontoret innhente samtykke fra den eller de med foreldreansvaret før det søkes om tjenesten. Samtykket bør være skriftlig... **Source:** DOC-REQ 5.43a.7 (Veileder til sosialtjenesteloven § 17).

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement establishes the core legal authority and substantive condition (necessity) under which data processing is lawful. *(Note: Do not proceed to Step 3 for this requirement).*

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This dictates the fundamental legal threshold from the GDPR that a legal basis must exist for processing to be lawful. *(Note: Do not proceed to Step 3 for this requirement).*

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This defines the substantive GDPR requirement for data processing to possess a supplementary basis in national law. *(Note: Do not proceed to Step 3 for this requirement).*

Requirement 4: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: This requirement dictates an administrative standard for how caseworkers limit the stored records regarding children, which borders on a substantive privacy standard.

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: This requirement dictates the exact administrative tone (neutral) and strict content limits of case file documentation produced about a child.

Requirement 6: [PROCEDURAL/DOCUMENTATION] Justification: This requirement prescribes the specific administrative method for how professional IT systems must be utilized during case documentation.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: This dictates an exhaustive checklist of criteria and the written form that a consent record must meet, which overlaps with the substantive legal validity of consent.

Requirement 8: [SUBSTANTIVE LEGAL OBLIGATION] Justification: This requirement establishes an absolute substantive precondition (a legal basis or consent) that must exist before confidential information can be disclosed. *(Note: Do not proceed to Step 3 for this requirement).*

Requirement 9: [PROCEDURAL/DOCUMENTATION] Justification: This mandates a strict sequential procedural priority requiring caseworkers to always ask for consent first, even when substantive authority otherwise exists.

Requirement 10: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: This imposes a mandatory procedural sequence to obtain user consent prior to gathering information, essentially replacing the open legal necessity assessment.

Requirement 11: [PROCEDURAL/DOCUMENTATION] Justification: This imposes a mandatory administrative assessment procedure that must be conducted before disclosing information to other agencies.

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: This dictates an internal compliance procedure by mandating the NAV leader to strictly accommodate the owners' security requirements.

Requirement 13: [PROCEDURAL/DOCUMENTATION] Justification: This strictly dictates both the required content of case file records (documenting need) and the assessment procedure used to determine how to document it.

Requirement 14: [PROCEDURAL/DOCUMENTATION] Justification: This explicitly dictates the case-processing form, demanding oral applications be recorded and specific timestamps appear in the file.

Requirement 15: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: This establishes a mandatory procedural sequence (securing preferably written parental consent before a minor applies for services) that intersects with substantive rights.

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 **Circular/Source:** PROC-REQ 43a.4 (Barnets beste — veileder) **Nature of Procedural Requirement:** Caseworkers must have a special focus on limiting the information stored in records about individual children. **Legal Gap:** § 43 a contains no child-specific provision and no explicit data minimization rule; the circular restricts open assessment without textual grounding in the law. **Thematic Category:** [DOC-REQ]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 **Circular/Source:** PROC-REQ 43a.5 / DOC-REQ 5.43a.2 (Barnets beste — veileder) **Nature of Procedural Requirement:** Written information about children in a case file must be neutrally descriptive and limited to what is strictly necessary. **Legal Gap:** § 43 a confers general processing authority but does not prescribe content standards or neutrality requirements for written case records regarding children. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 **Circular/Source:** DOC-REQ 5.43a.1 (Barnets beste — veileder) **Nature of Procedural Requirement:** Professional IT systems must be utilized in a specific manner to safeguard children's privacy during documentation. **Legal Gap:** The statute leaves the method of processing open, but the circular imposes a mandatory normative expectation that restricts the entity's choice regarding IT system usage. **Thematic Category:** [DOC-REQ]

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 **Circular/Source:** PROC-REQ 43a.6 (Samarbeid kriminalomsorgen — NAV) **Nature of Procedural Requirement:** Consent procedures must ensure consent is voluntary, specific, informed, unequivocal via active action, and preferably written. **Legal Gap:** § 43 a leaves judgments on processing open ("nødvendig"), while the circular illegally replaces this discretion with a fixed, exhaustive checklist of consent conditions not found in the provision. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 **Circular/Source:** PROC-REQ 43a.8 (Samarbeid barnevern — NAV) **Nature of Procedural Requirement:** Caseworkers must systematically request consent first, even when another legal basis exists to exchange information. **Legal Gap:** § 43 a creates no procedural preference for consent over statutory authority; the circular eliminates the entity's discretion over sequencing by demanding a mandatory procedural priority. **Thematic Category:** [SEQUENCE]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 10 **Circular/Source:** PROC-REQ 43a.9 (Veileder sosialtjenesteloven § 17) **Nature of Procedural Requirement:** Caseworkers must secure consent prior to gathering information on behalf of a user. **Legal Gap:** § 43 a uses an open necessity standard ("nødvendig"), which the circular illegally replaces with an absolute procedural precondition demanding consent before gathering takes place. **Thematic Category:** [SEQUENCE]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 **Circular/Source:** PROC-REQ 43a.10 (Samarbeid kriminalomsorgen — NAV) **Nature of Procedural Requirement:** A concrete, formal assessment must be conducted before disclosing information to other administrative bodies. **Legal Gap:** § 43 a does not mandate any separate assessment procedure before disclosure; the circular shadow-binds the open evaluation of necessity by mandating a specific, formal procedural step. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 12 **Finding Reference:** REQUIREMENT 12 **Circular/Source:** PROC-REQ 43a.11 (Veileder partnerskapsavtalen) **Nature of Procedural Requirement:** The NAV leader must internally ensure compliance with stricter security requirements stipulated by the owners. **Legal Gap:** § 43 a contains no provision regarding internal governance or owner relations; the circular completely eliminates operational discretion over data security by mandating an internal compliance duty. **Thematic Category:** [REPORTING]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 **Circular/Source:** DOC-REQ 5.43a.5 (Veileder om økonomisk stønad) **Nature of Procedural Requirement:** The case file must document whether the applicant needs help, and the office must execute a concrete, individual assessment regarding how this is documented. **Legal Gap:** § 43 a does not prescribe mandatory documentation of need assessments or specify any method for documentation decisions; the circular imposes strict mandatory content and procedural steps. **Thematic Category:** [DOC-REQ]

Requirement Reference: 14 **Finding Reference:** REQUIREMENT 14 **Circular/Source:** DOC-REQ 5.43a.6 (Veileder til sosialtjenesteloven § 17) **Nature of Procedural Requirement:** Caseworkers must record oral applications and ensure that specific application timestamps appear in the case file. **Legal Gap:** § 43 a provides no duty to record oral applications or note timestamps; the circular unlawfully eliminates record-keeping discretion by mandating this specific file content. **Thematic Category:** [DOC-REQ]

Requirement Reference: 15 **Finding Reference:** REQUIREMENT 15 **Circular/Source:** DOC-REQ 5.43a.7 (Veileder til sosialtjenesteloven § 17) **Nature of Procedural Requirement:** The NAV office must obtain (preferably written) consent from parental authorities prior to a minor applying for advice and guidance. **Legal Gap:** § 43 a provides no specific consent preconditions when a service-seeker is a minor; the circular replaces the general permissive authority with a strict prior-consent gate. **Thematic Category:** [SEQUENCE]

Here is the analysis of the Track A deviation finding, executed strictly according to your three-step instruction.

Step 1 — Extract All Requirements for Process inflation(§ 44)

Requirement 1: Dokumenter og annet materiale som inneholder taushetsbelagte opplysninger skal oppbevares på forsvarlig måte. **Source:** R-35, 5.44.2.2 (DOC-REQ-44.1).

Requirement 2: Fysiske dokumenter skal oppbevares i låsbare skuffer og skap, og at elektroniske dokumenter kun skal være tilgjengelige for personer som trenger opplysningene i sitt arbeide. **Source:** R-35, 5.44.2.2 (PROC-REQ-44.1).

Requirement 3: Hvis det foreligger et behov for unntak fra taushetsplikten som ikke er hjemlet i lov, må den Nav-ansatte ha samtykke fra tjenestemottaker før opplysningene kan gis. **Source:** R-35 (PROC-REQ-44.2).

Requirement 4: Hvis grunnlaget for unntaket er hjemlet i lov, bør den ansatte likevel først be om tjenestemottakers samtykke fordi størst mulig grad av åpenhet og samarbeid alltid bør tilstrebes. **Source:** R-35 (PROC-REQ-44.3).

Requirement 5: Som utgangspunkt skal samtykket være skriftlig. **Source:** R-35, 5.44.2.6.2 (DOC-REQ-44.2 / PROC-REQ-44.4).

Requirement 6: I saksfremlegg, diskusjoner og lignende skal anonymisering brukes hvis uvedkommende for saken gis tilgang til dokumenter eller er tilstede i diskusjonen. **Source:** R-35, 5.44.2.6.3 (DOC-REQ-44.3 / PROC-REQ-44.5).

Requirement 7: I slike tilfeller må Nav-kontoret likevel foreta en konkret vurdering av hvorvidt de skal gi opplysninger om saken. I vurderingen må det tas hensyn til sakens art og tjenestemottakers helhetlige situasjon. **Source:** R-35 (PROC-REQ-44.6), related to fvl. § 13 a nr. 3.

Requirement 8: Det skal aldri innhentes opplysninger fra private institusjoner eller personer uten tjenestemottakers samtykke. **Source:** R-35 (PROC-REQ-44.7).

Requirement 9: Hvilke opplysninger som er nødvendige i den enkelte sak må vurderes individuelt ut fra tjenestemottakers situasjon og konkret i forhold til tjenesten det søkes om. **Source:** R-35 (PROC-REQ-44.8), citing fvl. § 13 b.

Requirement 10: Det må gjøres en konkret vurdering av om opplysninger skal utleveres eller ikke. I denne vurderingen vil det blant annet være av betydning om deling av opplysninger vil skade tillitsforholdet mellom tjenestemottaker og kommunen i Nav. **Source:** R-35 (PROC-REQ-44.9), citing fvl. § 13 b nr. 5.

Requirement 11: Kommunen må likevel sørge for at utleveringen av opplysninger registreres tilfredsstillende. **Source:** R-35, 5.44.2.6.8 (DOC-REQ-44.4 / PROC-REQ-44.10), citing § 44 fjerde ledd.

Requirement 12: Både kriminalomsorgen og velferdstjenestene har ansvar for å innhente slikt samtykke, og for arkivering og journalføring av samtykket i eget journalsystem. **Source:**

Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-44.5 / PROC-REQ-44.12).

Requirement 13: Et samtykke skal være frivillig, spesifikt, informert, gitt utvetydig gjennom aktiv handling og bør være skriftlig. **Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-44.6).

Requirement 14: Et uttrykkelig samtykke innebærer at personen må ha gjort noe aktivt for å gi sitt samtykke, og samtykke bør gis skriftlig. **Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (DOC-REQ-44.7 / PROC-REQ-44.11).

Requirement 15: Hvis Nav-kontoret skal innhente opplysninger på vegne av brukeren, må det foreligge et samtykke fra vedkommende før innhentingen. **Source:** Veileder til sosialtjenesteloven § 17 (DOC-REQ-44.8).

Requirement 16: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. **Source:** Barnets beste — veileder (DOC-REQ-44.9).

Requirement 17: I de tilfeller der den innsatte/domfelte har oppnevnt verge, må kriminalomsorgen og Nav være oppmerksom på dette og sikre dialog med verge ved innhenting av samtykke. **Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (PROC-REQ-44.13).

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative method for how confidential documents must be safely stored to implement the core confidentiality duty.

Requirement 2: [PROCEDURAL/DOCUMENTATION] This requirement dictates specific operational and physical security infrastructure (locked drawers, electronic access restrictions) for managing documents.

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] This requirement establishes the legal prerequisite (consent) as the only valid exception pathway when no statutory exception applies to the absolute confidentiality duty. *(Does not proceed to Step 3).*

Requirement 4: [PROCEDURAL/DOCUMENTATION] This requirement adds a procedural sequence, instructing caseworkers to seek consent prior to utilizing an existing legal basis for exception.

Requirement 5: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative form (written) that consent must take as a starting point.

Requirement 6: [PROCEDURAL/DOCUMENTATION] This requirement dictates the internal administrative process of anonymizing information during meetings and discussions to prevent unauthorized access.

Requirement 7: [PROCEDURAL/DOCUMENTATION] This requirement mandates a specific assessment procedure and dictates the precise factors that must be evaluated before information is disclosed.

Requirement 8: [SUBSTANTIVE LEGAL OBLIGATION] This requirement establishes an absolute legal boundary by prohibiting the gathering of information from private parties without consent. *(Does not proceed to Step 3).*

Requirement 9: [PROCEDURAL/DOCUMENTATION] This requirement dictates the evaluation procedure for assessing necessity individually based on context.

Requirement 10: [PROCEDURAL/DOCUMENTATION] This requirement dictates that the administrative assessment must concretely evaluate the specific factor of trust damage.

Requirement 11: [PROCEDURAL/DOCUMENTATION] This requirement dictates an internal post-disclosure record-keeping process (registration).

Requirement 12: [PROCEDURAL/DOCUMENTATION] This requirement dictates the specific administrative and operational system (own journal system) where consent must be archived and journaled.

Requirement 13: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement mixes substantive legal validity criteria from the GDPR (voluntary, specific, informed) with procedural administrative form recommendations (should be written).

Requirement 14: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. The requirement defines the substantive legal nature of explicit consent while concurrently recommending a procedural written form.

Requirement 15: [SUBSTANTIVE LEGAL OBLIGATION] This requirement establishes a substantive legal prerequisite (consent) for the municipality's authority to gather information on the user's behalf. *(Does not proceed to Step 3).*

Requirement 16: [PROCEDURAL/DOCUMENTATION] This requirement dictates the documentation standard of neutrality and strict data minimization when writing case files concerning children.

Requirement 17: [PROCEDURAL/DOCUMENTATION] This requirement dictates the administrative procedure of ensuring a communicative dialogue with an appointed guardian during the consent gathering process.

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** REQUIREMENT 1 av 17 **Circular/Source:** R-35, 5.44.2.2 (DOC-REQ-44.1) **Nature of Procedural Requirement:** Documents containing confidential information must be stored securely. **Legal Gap:** The statute implies

a mandatory confidentiality duty but contains no explicit authorization for the circular to mandate physical storage standards. **Thematic Category:** [DOC-REQ]

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 av 17 **Circular/Source:** R-35, 5.44.2.2 (PROC-REQ-44.1) **Nature of Procedural Requirement:** Physical documents must be stored in locked drawers or cabinets, and electronic documents must be strictly access-controlled. **Legal Gap:** The circular dictates concrete physical and digital access controls, whereas the statute is entirely silent on the specifics of storage methods. **Thematic Category:** [DOC-REQ]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 av 17 **Circular/Source:** R-35 (PROC-REQ-44.3) **Nature of Procedural Requirement:** The caseworker should sequentially seek the user's consent before disclosing information, even if a statutory basis already exists. **Legal Gap:** The statute grants permissive discretion ('kan') to disclose without placing any procedural pre-condition (such as attempting to obtain consent first) on its exercise. **Thematic Category:** [SEQUENCE]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 av 17 **Circular/Source:** R-35, 5.44.2.6.2 (DOC-REQ-44.2 / PROC-REQ-44.4) **Nature of Procedural Requirement:** Caseworkers must secure consent in written form as a default starting point. **Legal Gap:** The statute leaves the form of consent entirely open, but the circular escalates this by establishing written form as the mandatory default, resulting in shadow-binding. **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 av 17 **Circular/Source:** R-35, 5.44.2.6.3 (DOC-REQ-44.3 / PROC-REQ-44.5) **Nature of Procedural Requirement:** Anonymization must be used in internal presentations or discussions if unauthorized persons are present. **Legal Gap:** There is no legal gap; this requirement is a fully authorized and natural implementation of the mandatory confidentiality duty established in the incorporated provision fvl. § 13 a nr. 2. **Thematic Category:** [OTHER] Internal data handling and presentation procedure to prevent unauthorized disclosure.

Requirement Reference: 7 **Finding Reference:** REQUIREMENT 7 av 17 **Circular/Source:** R-35 (PROC-REQ-44.6), related to fvl. § 13 a nr. 3 **Nature of Procedural Requirement:** The Nav office must conduct a concrete assessment evaluating the nature of the case and the user's holistic situation before deciding to disclose information. **Legal Gap:** The statute grants fully open judgment on whether to disclose, but the circular mandates the format of the assessment and prescribes two specific factors that must be evaluated, eliminating the authority's freedom (shadow-binding). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 9 **Finding Reference:** REQUIREMENT 9 av 17 **Circular/Source:** R-35 (PROC-REQ-44.8), citing fvl. § 13 b **Nature of Procedural Requirement:** Necessity regarding information sharing must be evaluated individually based on the user's situation and the service applied for. **Legal Gap:** There is no legal gap; the circular correctly implements the statute's open normative term ('nødvendig') using natural contextual factors without artificially constraining discretion. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** REQUIREMENT 10 av 17 **Circular/Source:** R-35 (PROC-REQ-44.9), citing fvl. § 13 b nr. 5 **Nature of Procedural**

Requirement: The caseworker must perform a concrete assessment regarding disclosure that explicitly evaluates whether sharing will damage the trust relationship. **Legal Gap:** There is no legal gap; assessing potential trust damage is an explicitly mandated statutory condition in § 44 that the circular accurately applies. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 11 **Finding Reference:** REQUIREMENT 11 av 17 **Circular/Source:** R-35, 5.44.2.6.8 (DOC-REQ-44.4 / PROC-REQ-44.10), citing § 44 fjerde ledd **Nature of Procedural Requirement:** The municipality must satisfactorily register its disclosure of information to the police or correctional services. **Legal Gap:** There is no legal gap; the mandatory post-disclosure registration is explicitly authorized as a procedural safeguard by the legislative preparatory works (Prop. 108 L). **Thematic Category:** [DOC-REQ]

Requirement Reference: 12 **Finding Reference:** REQUIREMENT 12 av 17 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-44.5 / PROC-REQ-44.12) **Nature of Procedural Requirement:** Consent must be archived and journaled specifically in the agency's own journal system. **Legal Gap:** The statute is entirely silent regarding the archiving and journaling of consent documents within specific operational systems, making this an unsupported system-level requirement. **Thematic Category:** [DOC-REQ]

Requirement Reference: 13 **Finding Reference:** REQUIREMENT 13 av 17 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (DOC-REQ-44.6) **Nature of Procedural Requirement:** Consent must meet defined validity criteria (voluntary, specific, informed, unambiguous action) and should be obtained in writing. **Legal Gap:** The veileder dictates mandatory consent validity criteria mirroring GDPR, for which § 44 itself provides absolutely no textual authority or definition. **Thematic Category:** [OTHER] Combines substantive validity criteria with administrative documentation form.

Requirement Reference: 14 **Finding Reference:** REQUIREMENT 14 av 17 **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (DOC-REQ-44.7 / PROC-REQ-44.11) **Nature of Procedural Requirement:** Explicit consent entails that the individual takes an active action, and it should be captured in writing. **Legal Gap:** The definition requiring active action for explicit consent and the written form recommendation possess no textual basis within § 44. **Thematic Category:** [OTHER] Combines legal definition with administrative documentation form.

Requirement Reference: 16 **Finding Reference:** REQUIREMENT 16 av 17 **Circular/Source:** Barnets beste — veileder (DOC-REQ-44.9) **Nature of Procedural Requirement:** Written case file information about children must be neutrally descriptive and limited to what is strictly necessary. **Legal Gap:** The statute is entirely silent on documentation standards; the circular imposes a data minimization standard on case documents lacking any textual authorization in § 44. **Thematic Category:** [DOC-REQ]

Requirement Reference: 17 **Finding Reference:** REQUIREMENT 17 av 17 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (PROC-REQ-44.13) **Nature of Procedural Requirement:** Caseworkers must be aware of guardianship structures and ensure dialogue with the guardian when collecting consent. **Legal Gap:** The statute contains zero provisions addressing legal capacity and guardianship

situations, offering no textual basis for the procedural dialogue requirement. **Thematic Category:** [USER-COMM]

Step 1 — Extract All Requirements for Process inflation(§ 45)

Requirement 1: Enhver som utfører tjeneste eller arbeid etter denne loven, skal i sitt arbeid være oppmerksom på forhold som kan føre til tiltak fra barneverntjenesten. **Source:** R-35, § 5.45 (PROC-REQ-45.1)

Requirement 2: ...skal uten hinder av taushetsplikt melde fra til barneverntjenesten uten ugrunnet opphold når det er grunn til å tro at et barn blir eller vil bli mishandlet... **Source:** R-35, § 5.45 (PROC-REQ-45.2)

Requirement 3: Enhver som utfører tjeneste eller arbeid etter denne loven, plikter også å gi opplysninger etter pålegg i samsvar med barnevernloven § 6-4. **Source:** R-35, § 5.45 (PROC-REQ-45.3)

Requirement 4: Hvis det er grunn til bekymring for barnets eller den unges livssituasjon, skal dette undersøkes nærmere gjennom samtale med foreldrene. **Source:** R-35, § 5.45.2.1 (PROC-REQ-45.4)

Requirement 5: Nav-kontoret skal bidra til å finne løsninger sammen med foreldrene. **Source:** R-35, § 5.45.2.1 (PROC-REQ-45.5)

Requirement 6: For å kunne ivareta oppmerksomhetsplikten, må Nav-kontoret kjenne til barneverntjenestens generelle hjelpetiltak... **Source:** R-35, § 5.45.2.1 (PROC-REQ-45.6)

Requirement 7: Det må vurderes konkret om opplysningene gir grunn til bekymring for om barnet befinner seg i en situasjon som utløser plikt til å melde fra. **Source:** R-35, § 5.45.2.2 (PROC-REQ-45.7)

Requirement 8: Når opplysningsplikten foreligger, skal den ansatte umiddelbart melde fra til barneverntjenesten. **Source:** R-35, § 5.45.2.2 (PROC-REQ-45.8)

Requirement 9: Det skal ikke foretas ytterligere undersøkelser for å bekrefte eller avkrefte bekymringen. **Source:** R-35, § 5.45.2.2 (PROC-REQ-45.9)

Requirement 10: Meldingen til barneverntjenesten skal være fra navngitt ansatt, eller vedkommendes leder, slik at barneverntjenesten på best mulig måte kan vurdere innholdet i meldingen og behovet for å innhente ytterligere opplysninger. **Source:** R-35, § 5.45.2.2 (PROC-REQ-45.10 / DOC-REQ-45.1)

Requirement 11: Nav-kontoret bør utarbeide rutiner for hvordan opplysningsplikten skal ivaretas. **Source:** R-35, § 5.45.2.2 (PROC-REQ-45.11 / DOC-REQ-45.2)

Requirement 12: Drøftingene skal være anonyme. Dette innebærer at det ikke skal brukes navn, adresser eller andre opplysninger som kan avsløre barnet eller foreldrenes identitet. **Source:** R-35, § 5.45.2.4 (PROC-REQ-45.12 / DOC-REQ-45.3)

Requirement 13: Hvis tjenesten avdekker et behov som barnevernstjenesten bør vurdere, skal tjenesten veilede om tilbudet eller bistå familien ved kontakt. **Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (PROC-REQ-45.13)

Requirement 14: Dersom tjenesten bistår ved å ta kontakt, må det foreligge samtykke. **Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (PROC-REQ-45.14)

Requirement 15: Det må vurderes konkret om det er tilstrekkelig å melde fra kun til barnevernet i en slik situasjon, eller om politiet også skal varsles. **Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (PROC-REQ-45.15)

Requirement 16: Dersom Nav-kontoret skal fange opp... vanskelige livssituasjoner for barn... er det avgjørende at kartleggingen er god nok. **Source:** Kommunebrev 2025 (PROC-REQ-45.16)

Requirement 17: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. **Source:** Barnets beste – veileder (DOC-REQ-45.4)

Requirement 18: Det som skrives om barnet i saken bør være nøytralt beskrivende og begrense seg til det som er strengt nødvendig for å vise at vi har tatt tilstrekkelig hensyn til barnets beste. **Source:** Barnets beste – veileder (DOC-REQ-45.5)

Requirement 19: Når det skal dokumenteres i enkeltsaker, er det viktig at fagsystemene brukes på en måte som ivaretar barnets rett til personvern. **Source:** Barnets beste – veileder (DOC-REQ-45.6)

Requirement 20: Et uttrykkelig samtykke innebærer at personen må ha gjort noe aktivt for å gi sitt samtykke, og samtykke bør gis skriftlig. **Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret (DOC-REQ-45.7)

Step 2 — Classify Each Requirement

Requirement 1: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The text identifies this as an entirely open normative legal standard establishing the mandatory duty of awareness without prescribing any specific method. *(Will not proceed to Step 3)*

Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The text establishes this as an open evidence standard ("grunn til å tro") and substantive threshold that directly triggers the duty to report. *(Will not proceed to Step 3)*

Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The text classifies this as purely prescriptive law establishing a legal duty activated strictly by an external formal order. *(Will not proceed to Step 3)*

Requirement 4: [PROCEDURAL/DOCUMENTATION] Justification: The finding establishes that this converts an open awareness duty into a fixed mandatory investigative process, specifically an investigation through parental conversation.

Requirement 5: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding strictly classifies this as a substantive welfare-assistance obligation that goes entirely beyond the procedural awareness and reporting framework of § 45. *(Will not proceed to Step 3)*

Requirement 6: [PROCEDURAL/DOCUMENTATION] - *Ambiguous — recommend human legal review* Justification: The circular mandates a specific institutional competence prerequisite for how the awareness duty is fulfilled, attempting to fix a concrete operational method where the law grants professional judgment.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Justification: The circular mandates that the assessment of the evidentiary reporting threshold must be conducted as a case-specific, concrete factual evaluation procedure.

Requirement 8: [PROCEDURAL/DOCUMENTATION] Justification: The circular converts a standard that allows for justified delays into an absolute, immediate administrative timing obligation.

Requirement 9: [PROCEDURAL/DOCUMENTATION] Justification: The circular escalates the open evidence-gathering discretion into an absolute administrative prohibition on conducting further investigations.

Requirement 10: [PROCEDURAL/DOCUMENTATION] Justification: The circular converts open discretion regarding reporting into a concrete mandatory procedural rule governing the form and named attribution of the report.

Requirement 11: [PROCEDURAL/DOCUMENTATION] Justification: The circular recommends the administrative creation of internal organizational routines to handle the reporting duty.

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: The circular establishes a strict procedural anonymization requirement that governs preliminary consultations with the child welfare services.

Requirement 13: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The finding determines this requirement imposes a substantive service duty to provide guidance and assistance, which is entirely absent from § 45. *(Will not proceed to Step 3)*

Requirement 14: [PROCEDURAL/DOCUMENTATION] - *Ambiguous — recommend human legal review* Justification: The requirement establishes the procedural prerequisite of obtaining consent before undertaking a distinct voluntary administrative activity.

Requirement 15: [PROCEDURAL/DOCUMENTATION] - *Ambiguous — recommend human legal review* Justification: The requirement mandates a concrete evaluation process regarding whether an inter-agency referral notification should also be sent to the police.

Requirement 16: [PROCEDURAL/DOCUMENTATION] Justification: The circular imposes an absolute sufficiency standard and concrete quality threshold for the mapping and assessment procedure.

Requirement 17: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates that the "best interest of the child" assessments must be formally documented so they can be externally reviewed.

Requirement 18: [PROCEDURAL/DOCUMENTATION] Justification: The requirement dictates specific stylistic content limitations and normative drafting standards for case note records.

Requirement 19: [PROCEDURAL/DOCUMENTATION] Justification: The circular dictates practical procedures for how IT systems must be utilized to protect privacy during documentation.

Requirement 20: [PROCEDURAL/DOCUMENTATION] Justification: The requirement regulates the administrative form and documentation of consent, mandating active steps and written records.

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** PROC-REQ-45.4 **Circular/Source:** R-35, § 5.45.2.1 **Nature of Procedural Requirement:** Conduct a mandatory investigative process through a direct conversation with the parents if there are grounds for concern. **Legal Gap:** While § 45 leaves the method of fulfilling the awareness duty entirely open to professional judgment, the circular enforces a specific mandatory investigative step lacking clear statutory authorization. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 6 **Finding Reference:** PROC-REQ-45.6 **Circular/Source:** R-35, § 5.45.2.1 **Nature of Procedural Requirement:** The NAV office must possess specific knowledge of general child welfare measures to fulfill the awareness duty. **Legal Gap:** § 45 leaves how awareness is practically fulfilled open; the circular converts this into a mandatory institutional competence prerequisite that § 45 arguably does not authorize. **Thematic Category:** [OTHER] (Institutional competence prerequisite)

Requirement Reference: 7 **Finding Reference:** PROC-REQ-45.7 **Circular/Source:** R-35, § 5.45.2.2 **Nature of Procedural Requirement:** Perform a concrete, individualized evaluation of whether the information triggers the reporting duty threshold. **Legal Gap:** There is no legal gap (HAS_HJEMMEL); the law's condition inherently implies an individual factual assessment, meaning the circular does not escalate the law's standard. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 8 **Finding Reference:** PROC-REQ-45.8 **Circular/Source:** R-35, § 5.45.2.2 **Nature of Procedural Requirement:** Process and submit the formal report to child welfare services immediately. **Legal Gap:** § 45 implicitly permits justified delays ("uten ugrunnet opphold"), but the circular eliminates this judgment margin by mandating absolute immediate processing. **Thematic Category:** [SEQUENCE]

Requirement Reference: 9 **Finding Reference:** PROC-REQ-45.9 **Circular/Source:** R-35, § 5.45.2.2 **Nature of Procedural Requirement:** Absolute prohibition against undertaking any further administrative investigation or evidence-gathering to confirm or refute a concern. **Legal Gap:** The law leaves the evidence-gathering phase open to professional discretion; the circular converts this into a strict ban on gathering further factual information, removing legitimate assessment activity. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** PROC-REQ-45.10 / DOC-REQ-45.1 **Circular/Source:** R-35, § 5.45.2.2 **Nature of Procedural Requirement:** Structure the report to explicitly include the name of the sending employee or manager. **Legal Gap:** § 45 simply mandates reporting with no rules on form or authorship; the circular mandates concrete attribution requirements lacking statutory basis. **Thematic Category:** [DOC-REQ]

Requirement Reference: 11 **Finding Reference:** PROC-REQ-45.11 / DOC-REQ-45.2 **Circular/Source:** R-35, § 5.45.2.2 **Nature of Procedural Requirement:** Develop organizational routines covering how the reporting duty is handled. **Legal Gap:** § 45 creates individual duties without referencing organizational systems; there is no legal basis in § 45 for mandating the preparation of institutional routines. **Thematic Category:** [REPORTING]

Requirement Reference: 12 **Finding Reference:** PROC-REQ-45.12 / DOC-REQ-45.3 **Circular/Source:** R-35, § 5.45.2.4 **Nature of Procedural Requirement:** Remove names, addresses, and identifying information when engaging in preliminary consultations with child welfare. **Legal Gap:** § 45 manages formal mandatory reporting but is entirely silent on—and provides no basis for regulating—pre-reporting anonymous consultations. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 14 **Finding Reference:** PROC-REQ-45.14 **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret **Nature of Procedural Requirement:** Secure user consent prior to providing voluntary assistance with contacting child welfare services. **Legal Gap:** § 45 regulates mandatory reporting that overrides confidentiality; it provides no authority for consent rules governing voluntary contact assistance, which relies on external privacy laws. **Thematic Category:** [USER-COMM]

Requirement Reference: 15 **Finding Reference:** PROC-REQ-45.15 **Circular/Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav **Nature of Procedural**

Requirement: Conduct a concrete evaluation to determine if an inter-agency referral/notification to the police is required alongside child welfare reporting. **Legal Gap:** § 45 solely addresses reporting to the child welfare service; police notification procedures rely on the Penal Code, making § 45 a false statutory anchor. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 16 **Finding Reference:** PROC-REQ-45.16 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** Map and assess a child's difficult life situation up to a "decisive" standard of sufficiency. **Legal Gap:** The law leaves the depth and quality of awareness entirely open to professional judgment, but the circular imposes a strict, concrete adequacy and quality threshold without authorization in § 45. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 17 **Finding Reference:** DOC-REQ-45.4 **Circular/Source:** Barnets beste – veileder **Nature of Procedural Requirement:** Document case evaluations regarding the best interest of the child to enable later review. **Legal Gap:** § 45 contains no documentation obligation whatsoever; the mandate derives from the Convention on the Rights of the Child and general administrative law instead. **Thematic Category:** [DOC-REQ]

Requirement Reference: 18 **Finding Reference:** DOC-REQ-45.5 **Circular/Source:** Barnets beste – veileder **Nature of Procedural Requirement:** Write case notes about children using neutrally descriptive language limited strictly to what is necessary. **Legal Gap:** § 45 has zero provisions governing how case records should be styled or limited; these standards derive from archiving and privacy laws. **Thematic Category:** [DOC-REQ]

Requirement Reference: 19 **Finding Reference:** DOC-REQ-45.6 **Circular/Source:** Barnets beste – veileder **Nature of Procedural Requirement:** Use IT and professional systems in ways that safeguard the child's right to data privacy when documenting individual cases. **Legal Gap:** § 45 contains no rules regarding IT systems or data protection practices, which are entirely governed by GDPR and related laws. **Thematic Category:** [DOC-REQ]

Requirement Reference: 20 **Finding Reference:** DOC-REQ-45.7 **Circular/Source:** Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret **Nature of Procedural Requirement:** Ensure consent for information sharing involves an active step and record it in written form. **Legal Gap:** § 45 addresses mandatory overrides of confidentiality and lacks any provisions on consent formatting; such rules reside in privacy regulations like GDPR. **Thematic Category:** [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 46)

Requirement: Dersom et folkevalgt organ etter kommunestyrets beslutning skal behandle saker vedrørende enkeltpersoner etter denne loven, skal organet ha tre til fem medlemmer. Source: R-35 § 46 / PROC-REQ-46.1.

Requirement: Tjenestemottakere kan selv bringe saker inn for organet. Source: R-35 § 46 / PROC-REQ-46.2.

Requirement: Det samme kan de folkevalgte og kommunens administrasjon. Source: R-35 § 46 / PROC-REQ-46.3.

Requirement: Enkeltvedtak kan uavhengig av om saken behandles i organet, påklages og oversendes statsforvalteren. Source: R-35 § 46 / PROC-REQ-46.4.

Requirement: PROC-REQ-18.1. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.2. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.3. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.4. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.5. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.6. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.7. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.8. Source: Veileder Øk. Stønad.

Requirement: PROC-REQ-18.9. Source: Kommunebrev 2025.

Requirement: PROC-REQ-18.10. Source: Kommunebrev 2025.

Step 2 — Classify Each Requirement

Requirement Classification: [SUBSTANTIVE LEGAL OBLIGATION] (Noted here, do not proceed to Step 3). Justification: The requirement establishes the specific legal duty the municipality carries regarding the precise composition and exact member count of the elected body.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding explicitly describes this as a "procedural right to submit cases," though it inherently involves a substantive right granted to the service recipient.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: The requirement dictates the administrative process specifying how cases can be referred to the body by elected officials and the administration.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the requirement dictates the administrative process of forwarding appeals to the county governor, though it ultimately stems from a substantive legal right to appeal.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Requirement Classification: [PROCEDURAL/DOCUMENTATION] (Proceed to Step 3). Justification: Ambiguous — recommend human legal review; the finding provides no text for this orphan requirement, making it impossible to assess its substantive or procedural nature without further information.

Step 3 — Structured Entry

Requirement Reference: Requirement **Finding Reference:** Krav 2 av 4 — PROC-REQ-46.2 **Circular/Source:** R-35 § 46 / PROC-REQ-46.2 **Nature of Procedural Requirement:** Defines the administrative process allowing service recipients to directly submit their own cases to the elected body. **Legal Gap:** The procedural right for service recipients to submit cases is entirely absent from the provided statutory text of § 46, creating an uncertainty gap requiring verification against the full statutory text or kommuneloven. **Thematic Category:** [OTHER] (User initiation and case submission process fits none of the standard categories).

Requirement Reference: Requirement **Finding Reference:** Krav 3 av 4 — PROC-REQ-46.3 **Circular/Source:** R-35 § 46 / PROC-REQ-46.3 **Nature of Procedural Requirement:** Dictates the administrative process enabling elected officials and the municipal administration to refer or bring cases into the elected body. **Legal Gap:** The right of the administration and elected officials to refer cases is entirely absent from the provided statutory text of § 46, creating a basis-uncertainty gap. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: Requirement **Finding Reference:** Krav 4 av 4 — PROC-REQ-46.4 **Circular/Source:** R-35 § 46 / PROC-REQ-46.4 **Nature of Procedural Requirement:** Dictates the administrative process for forwarding appealed individual decisions to the county governor. **Legal Gap:** No gap exists, as the finding establishes this requirement is fully supported by mandatory-closed rights in general administrative law (fvl. §§ 28–34) without escalating any permissive statutory language. **Thematic Category:** [SEQUENCE]

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Veileder Øk. Stønad **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Requirement Reference: Requirement **Finding Reference:** Orphan Requirements **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** Unspecified in the finding due to absent text. **Legal Gap:** The finding establishes no substantive gap against § 46, as this is an out-of-scope mapping artifact appropriately linked to § 18. **Thematic Category:** [OTHER] (Out-of-scope orphan requirement).

Step 1 — Extract All Requirements for Process inflation(§ 47)

Requirement: I enkeltvedtaket skal tjenestemottaker informeres om at statsforvalteren er klageinstans, fremgangsmåten ved klage og klagefrist. Source: R-35 Para 47 / DOC-47.1 Requirement: En klage skal: fremsettes for Nav-kontoret, være skriftlig Source: R-35 Para 47 / DOC-47.2 Requirement: En klage skal: [...] være undertegnet av klager eller fullmektig Source: R-35 Para 47 / DOC-47.3 Requirement: En klage skal: [...] nevne det vedtak det klages over Source: R-35 Para 47 / DOC-47.4 Requirement: En klage skal: [...] nevne den endring som ønskes Source: R-35 Para 47 / DOC-47.5 Requirement: En klage skal: [...] angi begrunnelse for eventuell oversittelse av klagefristen Source: R-35 Para 47 / DOC-47.6 Requirement: Og bør: være begrunnet / Klagen bør i tillegg være begrunnet. Source: R-35 Para 47 / DOC-47.7 + Veileder til sotjl. § 17 / DOC-47.12 Requirement: Vurderer Nav-kontoret at tjenestemottaker har helt eller delvis rett i sin klage, skal det fattes nytt vedtak som erstatter det opprinnelige. / Det betyr at kontoret må gjøre en ny vurdering av om brukeren skal innvilges tjenesten. Source: R-35 Para 47 / DOC-47.8 + PROC-47.8 + DOC-47.13 + PROC-47.S4 Requirement: skal statsforvalteren stadfeste avslagsvedtaket og informere om hvorfor. Source: R-35 Para 47 / DOC-47.9 Requirement: Slike klager skal tas opp med kommunens administrasjon eller leder for de kommunale tjenestene i Nav-kontoret, og klagen skal behandles og besvares i tråd med god forvaltningsskikk. Source: R-35 Para 47 / DOC-47.10 + PROC-47.12 Requirement: En klage skal fremsettes for Nav-kontoret, være skriftlig og undertegnet av klager eller fullmektig, nevne det vedtak det klages over og endringen som ønskes, og angi begrunnelse for eventuell oversittelse av klagefristen. Source: Veileder til sotjl. § 17 / DOC-47.11 Requirement: Nav-kontoret skal bistå dem som trenger det med å utforme klage. Source: R-35 Para 47 / PROC-47.1 Requirement: Inneholder klagen feil eller mangler skal Nav-kontoret gi tjenestemottaker anledning til å rette opp dette. / Når Nav-kontoret mottar en klage må kontoret umiddelbart undersøke om klagen har feil eller mangler, og eventuelt gi brukeren en frist for å rette opp dette. Source: R-35 Para 47 / PROC-47.2 + Veileder / PROC-47.S1 Requirement: Hvis feil eller mangler ikke blir rettet, skal klagen avvises. Source: R-35 Para 47 / PROC-47.3 Requirement: Ved oversittelse av klagefristen må det vurderes om det foreligger særlige grunner som gjør at klagen likevel skal behandles. Source: R-35 Para 47 / PROC-47.4 Requirement: Nav-kontoret har plikt til å vurdere og undersøke de forhold som fremkommer i klagen. Source: R-35 Para 47 / PROC-47.5 Requirement: Kravet om at Nav-kontoret skal forberede og avgjøre saker uten ugrunnet opphold gjelder også klagesaker. / Kontoret må videre vurdere om saken trenger en rask avgjørelse. Source: R-35 Para 47 / PROC-47.6 + Veileder / PROC-47.S2 Requirement: ...hvis brukerens hjelpebehov er akutt, må klagen som hovedregel behandles samme dag. Source: Veileder til sotjl. § 17 / PROC-47.S3 Requirement: Nav-kontoret skal sørge for at tjenestemottakers hjelpebehov er ivaretatt også mens klagen er til behandling. Source: R-35 Para 47 / PROC-47.7 Requirement: Hvis klagen ikke tas til følge, skal saken oversendes statsforvalteren så fort den er forberedt. Source: R-35 Para 47 / PROC-47.9 Requirement: Nav-kontoret må gi god informasjon og bistå dem som trenger det med å fremme klagen. Source: R-35 Para 47 / PROC-47.10 Requirement: Klager som ikke gjelder enkeltvedtak skal ikke behandles etter denne bestemmelsen. Source: R-35 Para 47 / PROC-47.11 Requirement: Hvis Nav-kontoret er i tvil om klagen gjelder et enkeltvedtak eller misnøye over andre forhold, må dette avklares med tjenestemottaker. Source: R-35 Para 47 / PROC-47.13

Step 2 — Classify Each Requirement

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates how communication regarding appeal rights must be structured within the user's decision document. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the administrative form and submission process the complaint must follow. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the documentation requirement for the user's signature on the complaint. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the documentation requirement that the complaint identifies the contested decision. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the documentation requirement that the complaint states the desired outcome. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the documentation requirement to provide a reason for missing an appeal deadline. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates a recommendation for the administrative content and form of the complaint, specifically that it should contain reasoning. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the sequential steps and documentation required when the issuing authority upholds a complaint. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates the documentation and communication procedure the appeal body must follow when upholding a rejection. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates the internal routing and handling procedure for complaints not concerning formal single decisions. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It is a consolidated restatement dictating the formal written and documentation requirements for submitting a complaint. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates the administrative process of providing hands-on drafting assistance to a user. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the sequential process and user communication required when a complaint contains defects. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the administrative outcome of rejecting a complaint if procedural defects remain uncorrected. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates an evaluation procedure the authority must follow regarding late submissions. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates a general evaluation procedure requiring the authority to investigate the claims made in the complaint. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the timing procedure and sequential constraints for processing cases without delay and assessing urgency. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates a sequential processing timeline requiring same-day action for acute cases. Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It establishes a substantive duty on the municipality to ensure the user's ongoing welfare needs are met while an appeal is pending. *(Noted here, does not proceed to Step 3)*. Requirement: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the internal routing procedure of forwarding an unresolved complaint to the appeal body. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates the procedural communication step of providing information and assistance to the user when filing. Requirement: [PROCEDURAL/DOCUMENTATION]

Justification: It dictates the administrative scoping procedure for rejecting complaints that fall outside the single-decision rule. Requirement: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. Justification: It dictates a procedural communication step to clarify the legal nature of a complaint with the user.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: KRAV 1 av 23 Circular/Source: R-35 Para 47 / DOC-47.1 Nature of Procedural Requirement: Ensure the decision document informs the recipient that Statsforvalteren is the appeal body, outlines the procedure, and states the deadline. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [USER-COMM]

Requirement Reference: 2 Finding Reference: KRAV 2 av 23 Circular/Source: R-35 Para 47 / DOC-47.2 Nature of Procedural Requirement: Complaints must be submitted in writing to the Nav office. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 3 Finding Reference: KRAV 3 av 23 Circular/Source: R-35 Para 47 / DOC-47.3 Nature of Procedural Requirement: Complaints must be signed by the complainant or proxy. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 4 Finding Reference: KRAV 4 av 23 Circular/Source: R-35 Para 47 / DOC-47.4 Nature of Procedural Requirement: Complaints must specify the decision being appealed. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 5 Finding Reference: KRAV 5 av 23 Circular/Source: R-35 Para 47 / DOC-47.5 Nature of Procedural Requirement: Complaints must specify the desired change. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 6 Finding Reference: KRAV 6 av 23 Circular/Source: R-35 Para 47 / DOC-47.6 Nature of Procedural Requirement: Complaints must provide a reason if the deadline was missed. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 7 Finding Reference: KRAV 7 av 23 Circular/Source: R-35 Para 47 / DOC-47.7 + Veileder til sotjl. § 17 / DOC-47.12 Nature of Procedural Requirement: Complaints should ideally include substantive reasoning. Legal Gap: Neither § 47 nor fvl. § 32 provides an explicit textual basis for recommending that complaints include substantive reasoning. Thematic Category: [DOC-REQ]

Requirement Reference: 8 Finding Reference: KRAV 8 av 23 Circular/Source: R-35 Para 47 / DOC-47.8 + PROC-47.8 + DOC-47.13 + PROC-47.S4 Nature of Procedural Requirement: A new assessment must be made and a formal new decision issued if the Nav office agrees fully or partially with the complaint. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [ASSESS-PROC]

Requirement Reference: 9 Finding Reference: KRAV 9 av 23 Circular/Source: R-35 Para 47 / DOC-47.9 Nature of Procedural Requirement: Statsforvalteren must document reasons and inform the user when upholding a rejection. Legal Gap: § 47 addresses Nav-kontoret's

obligations rather than Statsforvalterens internal handling, and the circular explicitly anchors this to a separate statutory regime (Nav-loven § 14a). Thematic Category: [USER-COMM]

Requirement Reference: 10 Finding Reference: KRAV 10 av 23 Circular/Source: R-35 Para 47 / DOC-47.10 + PROC-47.12 Nature of Procedural Requirement: Complaints not concerning single decisions must be routed to municipal administration or unit leaders and answered per good administrative practice. Legal Gap: § 47 contains no provision governing internal routing and handling procedures for complaints that do NOT concern formal single decisions (enkeltvedtak). Thematic Category: [REFERRAL-COORD]

Requirement Reference: 11 Finding Reference: KRAV 11 av 23 Circular/Source: Veileder til sotjl. § 17 / DOC-47.11 Nature of Procedural Requirement: A composite requirement dictating that complaints must be written, submitted to Nav, signed, name the decision, state the desired change, and explain any delay. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [DOC-REQ]

Requirement Reference: 12 Finding Reference: KRAV 12 av 23 Circular/Source: R-35 Para 47 / PROC-47.1 Nature of Procedural Requirement: The Nav office must actively assist users in formulating and physically drafting a complaint. Legal Gap: The specific duty to provide hands-on drafting assistance goes beyond the general informational guidance duty explicitly covered by fvl. § 11. Thematic Category: [USER-COMM]

Requirement Reference: 13 Finding Reference: KRAV 13 av 23 Circular/Source: R-35 Para 47 / PROC-47.2 + Veileder / PROC-47.S1 Nature of Procedural Requirement: The Nav office must immediately check complaints for defects upon receipt and give the user an opportunity and deadline to correct them. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [SEQUENCE]

Requirement Reference: 14 Finding Reference: KRAV 14 av 23 Circular/Source: R-35 Para 47 / PROC-47.3 Nature of Procedural Requirement: The complaint must be formally rejected if procedural errors or defects are not corrected. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [SEQUENCE]

Requirement Reference: 15 Finding Reference: KRAV 15 av 23 Circular/Source: R-35 Para 47 / PROC-47.4 Nature of Procedural Requirement: The office must assess if special excusable grounds exist allowing a late complaint to be processed. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [ASSESS-PROC]

Requirement Reference: 16 Finding Reference: KRAV 16 av 23 Circular/Source: R-35 Para 47 / PROC-47.5 Nature of Procedural Requirement: The office has a duty to investigate and assess the facts and claims made in the complaint. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [ASSESS-PROC]

Requirement Reference: 17 Finding Reference: KRAV 17 av 23 Circular/Source: R-35 Para 47 / PROC-47.6 + Veileder / PROC-47.S2 Nature of Procedural Requirement: The office must process the complaint without undue delay and assess if the case requires a rapid decision. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [ASSESS-PROC]

Requirement Reference: 18 Finding Reference: KRAV 18 av 23 Circular/Source: Veileder til sotjl. § 17 / PROC-47.S3 Nature of Procedural Requirement: Acute complaints must generally be processed on the same day. Legal Gap: Neither § 47 nor fvl. § 11a provides explicit authority for a same-day processing standard in acute complaint cases. Thematic Category: [SEQUENCE]

Requirement Reference: 20 Finding Reference: KRAV 20 av 23 Circular/Source: R-35 Para 47 / PROC-47.9 Nature of Procedural Requirement: Unresolved complaints must be forwarded to Statsforvalteren as soon as they are prepared. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [REFERRAL-COORD]

Requirement Reference: 21 Finding Reference: KRAV 21 av 23 Circular/Source: R-35 Para 47 / PROC-47.10 Nature of Procedural Requirement: The Nav office must provide good information and assist users with filing the complaint. Legal Gap: The active assistance duty to file the complaint is not explicitly authorized by fvl. § 11 or § 47, and its linkage to a separate regime (Nav-loven § 14a) creates genuine ambiguity. Thematic Category: [USER-COMM]

Requirement Reference: 22 Finding Reference: KRAV 22 av 23 Circular/Source: R-35 Para 47 / PROC-47.11 Nature of Procedural Requirement: Complaints not regarding a formal single decision (enkeltvedtak) must not be processed under this specific paragraph. Legal Gap: N/A — HAS_HJEMMEL. Thematic Category: [SEQUENCE]

Requirement Reference: 23 Finding Reference: KRAV 23 av 23 Circular/Source: R-35 Para 47 / PROC-47.13 Nature of Procedural Requirement: The Nav office must clarify with the user if there is doubt regarding whether a complaint concerns a single decision or general dissatisfaction. Legal Gap: Neither § 47 nor fvl. § 11 contains an express textual obligation to conduct this procedural clarification with the service recipient. Thematic Category: [USER-COMM]

Step 1 — Extract All Requirements for Process inflation(§ 48)

Requirement 1: Statsforvalteren kan prøve alle sider av vedtaket. Source: R-35 § 48 Requirement 2: Når det gjelder prøvingen av det frie skjønn, kan statsforvalteren likevel bare endre vedtaket når skjønnet er åpenbart urimelig. Source: R-35 § 48 Requirement 3: Dersom et vedtak som gir klageren medhold, ikke kan settes i verk straks, kan statsforvalteren bestemme at det straks skal settes i verk midlertidige tiltak som skal dekke

et øyeblikkelig behov. Source: R-35 § 48 Requirement 4: Statsforvalteren må vurdere om tilbakesendelse er i tjenestemottakers interesse... eller om behovet for en rask avgjørelse tilsier at statsforvalteren fatter nytt vedtak. Source: R-35 § 48 (middle) Requirement 5: Statsforvalteren skal vurdere saken ut fra de opplysninger som foreligger når prøvingen skjer. Source: R-35 § 48 (middle) Requirement 6: Hvis statsforvalteren endrer Nav-kontorets vedtak, skal tjenestene som hovedregel beregnes fra søknadstidspunktet. Source: R-35 § 48 (middle) Requirement 7: Nav-kontoret har plikt til å rette seg etter statsforvalterens avgjørelse. Source: R-35 § 48 (middle) Requirement 8: Statsforvalteren skal alltid prøve den rettsanvendelsen Nav-kontoret har foretatt i saken. Source: R-35 § 48 (middle) Requirement 9: Dette betyr at statsforvalteren må vurdere om Nav-kontoret har benyttet korrekt lovhjemmel og tolket lovens bestemmelser riktig. Source: R-35 § 48 (middle) Requirement 10: Ved vurdering av klage på vedtak etter denne bestemmelsen, skal statsforvalteren alltid prøve om betingelsene for stønad er oppfylt. Source: R-35 § 48 (middle) Requirement 11: Statsforvalteren skal undersøke om Nav-kontoret har behandlet saken i tråd med reglene for forsvarlig saksbehandling. Source: R-35 § 48 (middle) Requirement 12: Dette omfatter at det må vurderes om saken har vært tilstrekkelig utredet, om tjenestemottaker har fått anledning til å uttale seg og medvirke, og om avgjørelsen er individuelt og konkret begrunnet. Source: R-35 § 48 (middle) Requirement 13: Statsforvalteren skal vurdere Nav-kontorets skjønnsutøvelse. Source: R-35 § 48 (end) Requirement 14: Statsforvalteren kan kun endre et vedtak ut fra disse grunnlagene dersom skjønnsutøvelsen er åpenbart urimelig. Source: R-35 § 48 (end) Requirement 15: Ved vurderingen av om skjønnet er åpenbart urimelig skal det tas utgangspunkt i lovens formål. Source: R-35 § 48 (end) Requirement 16: Det må vurderes om vedtaket får åpenbart urimelige konsekvenser for alle som er berørt av vedtaket. Source: R-35 § 48 (end) Requirement 17: Når Nav-kontoret mottar en klage må kontoret umiddelbart undersøke om klagen har feil eller mangler. Source: Veileder § 17 (Explains § 48 pre-phase) Requirement 18: Kontoret må videre vurdere om saken trenger en rask avgjørelse. Source: Veileder § 17 (Explains § 48 pre-phase) Requirement 19: Nav-kontoret skal vurdere og undersøke alle forhold som fremkommer i klagen. Det betyr at kontoret må gjøre en ny vurdering av saken. Source: Veileder § 17 (Explains § 48 pre-phase) Requirement 20: Hvis klagen skal oversendes klageinstansen, skal dette gjøres så fort saken er forberedt. Source: Veileder § 17 (Explains § 48 pre-phase) Requirement 21: Søknader skal vurderes individuelt og vedtak skal begrunnes. Source: Veileder til sosialtjenesteloven § 17 Requirement 22: Nav-kontoret har plikt til å nedtegne muntlige søknader. Source: Veileder til sosialtjenesteloven § 17 Requirement 23: Vedtaket skal vise om tjenesten er innvilget eller avslått, hva som eventuelt er innvilget og begrunnelsen for avgjørelsen. Source: Veileder til sosialtjenesteloven § 17 Requirement 24: Begrunnelsen skal vise til regelen vedtaket bygger på, som her vil være sotjl. § 17, og nevne faktiske forhold ved brukerens situasjon som har hatt betydning for avgjørelsen. Source: Veileder til sosialtjenesteloven § 17 Requirement 25: Hvis brukeren får opplysning, råd og veiledning i forbindelse med innvilgelse eller avslag av en annen tjeneste i sosialtjenesteloven, skal det i vedtaket som fattes om denne tjenesten fremgå hva som er gitt av opplysning, råd og veiledning. Source: Veileder til sosialtjenesteloven § 17 Requirement 26: Hvis det er forhold ved saken som gjør at tjenesten avsluttes, som for eksempel at den anses som gitt eller det ikke er mulig å få gjort noe mer, skal det skrives et avslutningsnotat, eventuelt et avslutningsbrev som informasjon til brukeren. Source: Veileder til sosialtjenesteloven § 17 Requirement 27: En klage skal fremsettes for Nav-kontoret, være skriftlig og undertegnet av klager eller fullmektig, nevne det vedtak det klages over og endringen som ønskes, og angi begrunnelse for eventuell oversittelse av klagefristen. Source: Veileder til sosialtjenesteloven

§ 17 Requirement 28: Dersom vi velger et resultat som innebærer at barnets beste ikke får gjennomslag må dette begrunnes særskilt og skriftlig for å sikre etterprøvbarhet og barnets rettssikkerhet. Source: Barnets beste — veileder Requirement 29: For at andre skal kunne se hvilke vurderinger som er gjort og ha mulighet for å etterprøve vurderingene må barnets beste-vurderingene dokumenteres. Source: Barnets beste — veileder Requirement 30: Innvilgelse, delvis innvilgelse og avslag på søknaden skal gis i form av enkeltvedtak. Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret Requirement 31: Råd og veiledning er en tjeneste som det skal fattes vedtak om eller som skal inngå som del av vedtak. Vedtaket skal bidra til å sikre tjenestemottakers rettigheter. Source: Kommunebrev 2025

Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] This requirement establishes the permissible scope ("alle sider") for the administrative procedure of conducting a case review. Requirement 2: [SUBSTANTIVE LEGAL OBLIGATION] This requirement dictates the specific legal threshold ("åpenbart urimelig") that must be met to substantively change a free discretion decision. (Noted: Proceed to Step 3 for remaining, skipping this). Requirement 3: [SUBSTANTIVE LEGAL OBLIGATION] This requirement outlines a substantive legal outcome by authorizing the immediate enactment of temporary measures to meet instant needs. (Noted: Proceed to Step 3 for remaining, skipping this). Requirement 4: [PROCEDURAL/DOCUMENTATION] This requirement dictates an administrative evaluation process determining whether to remit a case or quickly issue a new decision. Requirement 5: [PROCEDURAL/DOCUMENTATION] This requirement dictates a procedural and evidentiary rule to use the information present at the time the review is conducted. Requirement 6: [SUBSTANTIVE LEGAL OBLIGATION] This requirement mandates a substantive legal right regarding the baseline date for calculating benefits following a changed decision. (Noted: Proceed to Step 3 for remaining, skipping this). Requirement 7: [PROCEDURAL/DOCUMENTATION] This requirement directs the administrative hierarchy by legally obligating NAV to comply with Statsforvalteren's finalized ruling. Requirement 8: [PROCEDURAL/DOCUMENTATION] This requirement enforces a mandatory process by compelling a review of the legal application made by the local NAV office. Requirement 9: [PROCEDURAL/DOCUMENTATION] This requirement prescribes fixed steps in the review process by forcing an evaluation of correct legal basis and interpretation. Requirement 10: [PROCEDURAL/DOCUMENTATION] This requirement specifies a procedural obligation forcing the administrator to always assess if the benefit conditions are satisfied. Requirement 11: [PROCEDURAL/DOCUMENTATION] This requirement establishes a mandatory investigative step to review compliance with defensible casework rules. Requirement 12: [PROCEDURAL/DOCUMENTATION] This requirement introduces a specific three-item procedural checklist evaluating investigation sufficiency, user participation, and concrete justification. Requirement 13: [PROCEDURAL/DOCUMENTATION] This requirement imposes a mandatory administrative process to assess the local office's exercise of discretion. Requirement 14: [SUBSTANTIVE LEGAL OBLIGATION] This requirement dictates the substantive threshold ("åpenbart urimelig") acting as the sole gateway for changing a decision. (Noted: Proceed to Step 3 for remaining, skipping this). Requirement 15: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. This requirement mandates a fixed interpretive starting point for assessing unreasonableness, acting as a mandatory procedural consideration within an open

normative standard. Requirement 16: [PROCEDURAL/DOCUMENTATION] Ambiguous — recommend human legal review. This requirement forces a specific assessment step focusing on the consequences for all affected parties within the review parameters. Requirement 17: [PROCEDURAL/DOCUMENTATION] This requirement dictates a pre-phase processing step forcing NAV to check immediately for defects upon receiving a complaint. Requirement 18: [PROCEDURAL/DOCUMENTATION] This requirement directs an administrative triage step by requiring NAV to evaluate if a case necessitates a rapid decision. Requirement 19: [PROCEDURAL/DOCUMENTATION] This requirement enforces sequential casework operations requiring NAV to investigate all facts and reassess the entire case upon complaint receipt. Requirement 20: [PROCEDURAL/DOCUMENTATION] This requirement imposes a procedural timeline obligating the immediate forwarding of a prepared complaint. Requirement 21: [PROCEDURAL/DOCUMENTATION] This requirement dictates foundational case processing and documentation steps for individual assessment and justification. Requirement 22: [PROCEDURAL/DOCUMENTATION] This requirement enforces a strict record-keeping obligation to commit verbal applications to writing. Requirement 23: [PROCEDURAL/DOCUMENTATION] This requirement dictates documentation form and content by outlining exactly what the final decision record must display. Requirement 24: [PROCEDURAL/DOCUMENTATION] This requirement regulates documentation content by dictating what facts and legal citations the written justification must contain. Requirement 25: [PROCEDURAL/DOCUMENTATION] This requirement dictates record-keeping obligations to explicitly document any advice or guidance provided alongside a service decision. Requirement 26: [PROCEDURAL/DOCUMENTATION] This requirement mandates the production of a specific record — a closure note or letter — when closing out a service. Requirement 27: [PROCEDURAL/DOCUMENTATION] This requirement establishes formal communication and submission strictures that users must follow when appealing. Requirement 28: [PROCEDURAL/DOCUMENTATION] This requirement sets a heightened written documentation burden when the outcome overrides a child's best interest. Requirement 29: [PROCEDURAL/DOCUMENTATION] This requirement dictates the documentation of best interest assessments to ensure external verifiability. Requirement 30: [PROCEDURAL/DOCUMENTATION] This requirement dictates the mandatory administrative form that applications must be answered with (enkeltvedtak). Requirement 31: [PROCEDURAL/DOCUMENTATION] This requirement demands that guidance services are formally encapsulated within an administrative decision structure.

Step 3 — Structured Entry

Requirement Reference: 1 Finding Reference: PROC-REQ 48.1 / Krav 1 av 31 Circular/Source: R-35 § 48 Nature of Procedural Requirement: Statsforvalteren is permitted to review all aspects of a decision. Legal Gap: None; the circular reproduces the statutory text verbatim and correctly mirrors the permissive review competence. Thematic Category: [ASSESS-PROC]

Requirement Reference: 4 Finding Reference: PROC-REQ 48.4 / Krav 4 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must deliberate over whether remitting the case or creating a new rapid decision is in the user's interest. Legal Gap: § 48 permits broad review but does not explicitly require this specific mandatory assessment step; the circular improperly eliminates discretion by

converting the permissive competence into a mandatory, bounded consideration. Thematic Category: [ASSESS-PROC]

Requirement Reference: 5 Finding Reference: PROC-REQ 48.5 / Krav 5 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must restrict the evidentiary foundation to information available at the precise time the review occurs. Legal Gap: § 48 does not mandate a temporal reference point for evidentiary assessment; the circular closes off the open evidence-discretion authorized by law and dictates a fixed, mandatory temporal rule instead. Thematic Category: [ASSESS-PROC]

Requirement Reference: 7 Finding Reference: PROC-REQ 48.7 / Krav 7 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: The local NAV office is required to comply with Statsforvalteren’s finalized decisions. Legal Gap: While legally sound systemically under the general administrative appeal framework (fvl. § 34), § 48 itself solely governs Statsforvalteren's competence and does not explicitly formulate NAV's compliance obligations. Thematic Category: [OTHER] (Inter-agency hierarchical compliance)

Requirement Reference: 8 Finding Reference: PROC-REQ 48.8 / Krav 8 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must unconditionally review the legal application conducted by the lower office. Legal Gap: § 48 contains permissive language granting Statsforvalteren a choice ("kan prøve"); the circular escalates this into a mandatory and absolute obligation ("skal alltid"), eliminating whether-discretion over legal review. Thematic Category: [ASSESS-PROC]

Requirement Reference: 9 Finding Reference: PROC-REQ 48.9 / Krav 9 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must evaluate whether correct legal authority was applied and if statutory provisions were correctly interpreted. Legal Gap: The broad statutory "how-discretion" over what elements to scrutinize is improperly converted into a fixed, mandatory checklist of specific review objects. Thematic Category: [ASSESS-PROC]

Requirement Reference: 10 Finding Reference: PROC-REQ 48.10 / Krav 10 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must always check whether the basic conditions for the benefit are satisfied. Legal Gap: Converting a permissive authorization ("kan") into an unconditional command ("skal alltid prøve") eliminates both whether-discretion and how-discretion regarding review scrutiny. Thematic Category: [ASSESS-PROC]

Requirement Reference: 11 Finding Reference: PROC-REQ 48.11 / Krav 11 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must investigate if the case was processed defensibly according to administrative rules. Legal Gap: The law allows procedural review under "alle sider", but does not compel it; the circular incorrectly transforms an authorized discretionary competence into a mandatory investigatory duty. Thematic Category: [ASSESS-PROC]

Requirement Reference: 12 Finding Reference: PROC-REQ 48.12 / Krav 12 av 31 Circular/Source: R-35 § 48 (middle) Nature of Procedural Requirement: Statsforvalteren must evaluate a three-item checklist: whether the case was sufficiently investigated, whether the user was heard, and whether the decision was concretely justified. Legal Gap: These fvl.

§§ 17, 24-25 requirements lack an explicit statutory basis in § 48; the circular replaces open evidence-discretion with a rigid, mandatory procedural checklist. Thematic Category: [ASSESS-PROC]

Requirement Reference: 13 Finding Reference: PROC-REQ 48.13 / Krav 13 av 31 Circular/Source: R-35 § 48 (end) Nature of Procedural Requirement: Statsforvalteren must evaluate NAV's overall exercise of discretion. Legal Gap: Reviewing discretion is permissively authorized in the statute, but the circular imposes a mandatory duty to assess the discretion ("skal vurdere") exceeding the statutory grant. Thematic Category: [ASSESS-PROC]

Requirement Reference: 15 Finding Reference: PROC-REQ 48.15 / Krav 15 av 31 Circular/Source: R-35 § 48 (end) Nature of Procedural Requirement: The assessment of whether discretion is "manifestly unreasonable" must take the law's explicit purpose as its starting point. Legal Gap: § 48 supplies a purely normative threshold lacking methodological constraints; the circular partially fixes a mandatory starting methodology, heavily constricting the interpretive space. Thematic Category: [ASSESS-PROC]

Requirement Reference: 16 Finding Reference: PROC-REQ 48.16 / Krav 16 av 31 Circular/Source: R-35 § 48 (end) Nature of Procedural Requirement: It must be evaluated whether the decision creates obviously unreasonable consequences for all affected parties. Legal Gap: Adding a mandatory, fixed checklist item regarding consequences for all affected parties reduces the open interpretive space preserved by the statutory normative standard. Thematic Category: [ASSESS-PROC]

Requirement Reference: 17 Finding Reference: PROC-REQ 48.17 / Krav 17 av 31 Circular/Source: Veileder § 17 (Explains § 48 pre-phase) Nature of Procedural Requirement: NAV must immediately investigate received complaints for formal errors or defects. Legal Gap: This requirement governs a pre-phase processing step anchored exclusively in fvl. §§ 32–33, and lies entirely outside the substantive and discretionary architecture of § 48. Thematic Category: [SEQUENCE]

Requirement Reference: 18 Finding Reference: PROC-REQ 48.18 / Krav 18 av 31 Circular/Source: Veileder § 17 (Explains § 48 pre-phase) Nature of Procedural Requirement: NAV must evaluate if the complained-about case necessitates an urgent decision. Legal Gap: Urgency assessments upon complaint receipt derive from general administrative rules (fvl. § 33), representing an orphan requirement with zero explicit basis inside § 48. Thematic Category: [ASSESS-PROC]

Requirement Reference: 19 Finding Reference: PROC-REQ 48.19 / Krav 19 av 31 Circular/Source: Veileder § 17 (Explains § 48 pre-phase) Nature of Procedural Requirement: NAV must investigate all facts raised in the complaint and conduct a wholly new evaluation of the case. Legal Gap: The obligation forcing NAV to reconsider its own ruling before forwarding relies on fvl. § 33(4), meaning it falls completely outside the scope of § 48. Thematic Category: [ASSESS-PROC]

Requirement Reference: 20 Finding Reference: PROC-REQ 48.20 / Krav 20 av 31 Circular/Source: Veileder § 17 (Explains § 48 pre-phase) Nature of Procedural Requirement: A complaint must be forwarded to the appeal body as soon as case preparation is finished.

Legal Gap: This strict forwarding timeline is anchored in fvl. § 33(4) and is improperly mapped to § 48. Thematic Category: [SEQUENCE]

Requirement Reference: 21 Finding Reference: DOC-REQ 48.2 / Krav 21 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Caseworkers must assess applications individually and explicitly justify the resulting decisions. Legal Gap: Individual assessment and documentation rules belong strictly to the first-instance process (sotjl. §§ 17–18 and fvl. §§ 24–25), having no jurisdictional overlap with Statsforvalteren's § 48 review competence. Thematic Category: [DOC-REQ]

Requirement Reference: 22 Finding Reference: DOC-REQ 48.3 / Krav 22 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Verbal applications must be formally recorded in writing. Legal Gap: The documentation duty for oral submissions exists under fvl. § 17, and has no legal or textual connection to § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 23 Finding Reference: DOC-REQ 48.4 / Krav 23 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: The formal decision document must list whether services were granted, precisely what was given, and the justification. Legal Gap: Required first-instance documentation content finds its basis solely in fvl. §§ 24–25, leaving it outside the authority granted in § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 24 Finding Reference: DOC-REQ 48.5 / Krav 24 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: The decision's justification must explicitly state the rule relied upon and reference the relevant factual circumstances. Legal Gap: The circular explicitly sources this duty from sotjl. § 17 and fvl., confirming there is no grounding foundation within § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 25 Finding Reference: DOC-REQ 48.6 / Krav 25 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Decision documents must articulate whatever supplementary advice, information, and guidance was given to the user. Legal Gap: The mandate to capture first-instance advice aligns with sotjl. § 17's guidance duty, not Statsforvalteren's appellate scope governed by § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 26 Finding Reference: DOC-REQ 48.7 / Krav 26 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Concluded services must result in a formal case-closure note or user letter. Legal Gap: Producing documentation verifying that a service has naturally ended is a case management requirement devoid of any textual basis in § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 27 Finding Reference: DOC-REQ 48.8 / Krav 27 av 31 Circular/Source: Veileder til sosialtjenesteloven § 17 Nature of Procedural Requirement: Users must ensure their appeals are submitted in writing, signed, state the target decision, list requested changes, and excuse any deadline breaches. Legal Gap: These formatting requirements accurately reflect administrative appeal rules found in fvl. § 32, but they do not

trace to § 48, which dictates only what occurs once the complaint is handled. Thematic Category: [USER-COMM]

Requirement Reference: 28 Finding Reference: DOC-REQ 48.9 / Krav 28 av 31 Circular/Source: Barnets beste — veileder Nature of Procedural Requirement: Overriding a child's best interest requires creating specialized written documentation assuring legal verifiability. Legal Gap: The substantive documentation requirement for assessing children's rights originates in Grunnloven § 104 and the UN Convention on the Rights of the Child, lying wholly outside § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 29 Finding Reference: DOC-REQ 48.10 / Krav 29 av 31 Circular/Source: Barnets beste — veileder Nature of Procedural Requirement: Assessments regarding a child's best interest must be explicitly documented so external parties can review them. Legal Gap: The obligation to preserve child-welfare assessments draws exclusively from constitutional rules and fvl. § 24/25, presenting a totally mislinked requirement regarding § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 30 Finding Reference: DOC-REQ 48.11 / Krav 30 av 31 Circular/Source: Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret Nature of Procedural Requirement: Grants and denials of applications must be formatted strictly as an "enkeltvedtak". Legal Gap: The mandate prescribing that first-instance evaluations take this administrative format springs from fvl. § 2(b) and substantive law, lacking any legal nexus to § 48. Thematic Category: [DOC-REQ]

Requirement Reference: 31 Finding Reference: DOC-REQ 48.12 / Krav 31 av 31 Circular/Source: Kommunebrev 2025 Nature of Procedural Requirement: Advice and guidance services must themselves be formalized within an administrative decision structure. Legal Gap: First-instance decision-making obligations concerning purely advisory services reflect sotjl. § 17 directly, sitting distinctly outside the purview of Statsforvalteren's competence delineated in § 48. Thematic Category: [DOC-REQ]

Step 1 — Extract All Requirements for Process inflation(§ 49)

Requirement: Nav-kontorene skal sørge for at tjenestemottaker ikke er skadelidende som følge av uenighet. **Source:** R-35 punkt 5.49.1.

Requirement: Kommunene som er involvert i saken skal innhente alle opplysninger av betydning... **Source:** R-35 punkt 5.49.1.

Requirement: ...og gis mulighet til å uttale seg om hverandres fremleggelser av saken. **Source:** R-35 punkt 5.49.1.

Requirement: Hvis kommunene ligger i ulike fylker, skal statsforvalteren som behandler saken gi fylkesmennene til de andre kommunene anledning til å uttale seg før endelig avgjørelse blir truffet. **Source:** R-35 punkt 5.49.1.

Requirement: Statsforvalteren bør påse at kompetente organ i de involverte kommuner har tatt standpunkt til det omtvistede spørsmålet, herunder spørsmålet om tvistesak skal reises. **Source:** R-35 punkt 5.49.1.

Requirement: Videre bør statsforvalteren påse at kompetente organ i de involverte kommuner er klar over at tvisten ikke kan bringes inn for domstolen etter at statsforvalteren har avgjort den og at de er forelagt hverandres framleggelser av saken og har fått mulighet til å uttale seg. **Source:** R-35 punkt 5.49.1.

Requirement: Nav-kontorene skal sørge for at tjenestemottaker ikke er skadelidende som følge av uenighet. **Source:** Nasjonal veileder for samarbeidet mellom kriminalomsorgen og Nav (refererer R-35 pkt. 5.49.1).

Step 2 — Classify Each Requirement

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** The finding establishes that this imposes a specific mandatory duty on NAV offices to protect service recipients from harm, which concerns a legal obligation and outcome for the user. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding identifies this as an administrative mandate that converts open normative space into a specific, comprehensive information-gathering obligation. *Requirements classified [PROCEDURAL/DOCUMENTATION] → proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding states this rule converts an open space into a specific, fixed procedural requirement concerning administrative hearing rights and mutual review. *Requirements classified [PROCEDURAL/DOCUMENTATION] → proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding characterizes this requirement as a specific, complex mandatory procedural step for inter-agency cross-county consultation before an administrative decision is reached. *Requirements classified [PROCEDURAL/DOCUMENTATION] → proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding outlines that this imposes a supervisory checking role on the Statsforvalter regarding internal municipal decision-making procedures. *Requirements classified [PROCEDURAL/DOCUMENTATION] → proceed to Step 3.*

Requirement: [PROCEDURAL/DOCUMENTATION] **Justification:** The finding notes this establishes specific pre-decision checking and informational duties concerning the process and the finality of the decision. *Requirements classified [PROCEDURAL/DOCUMENTATION] → proceed to Step 3.*

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] **Justification:** Identical in text to Requirement 1, the finding confirms this creates a substantive, mandatory protective duty on NAV offices to prevent harm to the service recipient. *Requirements classified [SUBSTANTIVE LEGAL OBLIGATION] → noted here, do not proceed to Step 3.*

Step 3 — Structured Entry

Requirement Reference: 2 **Finding Reference:** REQUIREMENT 2 av 7 **Circular/Source:** R-35 punkt 5.49.1 **Nature of Procedural Requirement:** Involved municipalities are mandated to gather all relevant information pertaining to the dispute. **Legal Gap:** Section 49 leaves the manner of processing completely open ("behandlingsmåten") and delegates formal procedural rules to the Department, whereas the circular displaces this open space with a specific, mandatory, universal information-gathering requirement. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** REQUIREMENT 3 av 7 **Circular/Source:** R-35 punkt 5.49.1 **Nature of Procedural Requirement:** Municipalities must be given the opportunity to review and comment on each other's submissions during the dispute process. **Legal Gap:** The statute is silent on hearing obligations and leaves procedure wholly open, but the circular imposes a specific, absolute hearing right tied to mutual review, sidestepping formal rule-making by the Department. **Thematic Category:** [SEQUENCE]

Requirement Reference: 4 **Finding Reference:** REQUIREMENT 4 av 7 **Circular/Source:** R-35 punkt 5.49.1 **Nature of Procedural Requirement:** In cross-county disputes, the handling Statsforvalter must give Statsforvalters in the other involved counties the opportunity to comment before making a final decision. **Legal Gap:** Section 49 mentions no cross-county procedures and delegates rule-making to the Department, while the circular imposes a complex, mandatory inter-Statsforvalter consultation step out of entirely open normative space. **Thematic Category:** [REFERRAL-COORD]

Requirement Reference: 5 **Finding Reference:** REQUIREMENT 5 av 7 **Circular/Source:** R-35 punkt 5.49.1 **Nature of Procedural Requirement:** The Statsforvalter should ensure that competent organs within the involved municipalities have formally taken a stance on the dispute and whether a case should be raised. **Legal Gap:** Section 49 grants the Statsforvalter authority to decide the dispute but specifies no supervisory mandate or checking role over internal municipal authorization and decision-making bodies. **Thematic Category:** [OTHER] External supervisory checking requirement to verify the administrative competence of municipal bodies.

Requirement Reference: 6 **Finding Reference:** REQUIREMENT 6 av 7 **Circular/Source:** R-35 punkt 5.49.1 **Nature of Procedural Requirement:** The Statsforvalter should ensure involved municipalities are aware the dispute cannot be brought to court post-decision, and

verify they have seen each other's submissions and had the chance to comment. **Legal Gap:** Section 49 contains no language addressing informational duties regarding decision finality or ensuring mutual review, yet the circular creates specific pre-decision checking and informing duties absent a textual anchor. **Thematic Category:** [OTHER] Informational notification and process verification duties directed exclusively at municipalities.

Step 1 — Extract All Requirements for Process inflation(§ 49 a)

Requirement: Kommunen har plikt til å oppfylle et vedtak fra et statlig forvaltningsorgan som gir en privat part rett til tjenester, selv om domstolen har funnet vedtaket ugyldig gjennom et søksmål etter tvisteloven § 1-4 a. Source: R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.1

Requirement: Kommunen kan reise søksmål etter tvisteloven § 1-4 a. Source: R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.2

Requirement: Et vedtak som er kjent ugyldig av domstolen etter slikt søksmål fra kommunen, kan kun omgjøres til skade for den private part etter forvaltningsloven § 35 første ledd bokstav c, dersom årsaken til at vedtaket er ugyldig er at parten selv eller noen som har handlet på vegne av den private parten, forsettlig eller grovt uaktsomt har gitt uriktige opplysninger eller holdt tilbake opplysninger. Source: R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.3

Requirement: For å kunne gjøre om vedtaket må saken i tillegg framstå slik at vedtaket ikke ville fått tilsvarende innhold, dersom det ikke ble gitt uriktige opplysninger eller holdt tilbake opplysninger. Source: R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.4

Requirement: Det innebærer at kommunen vil kunne gjøre om vedtaket etter de andre reglene i forvaltningsloven § 35, også § 35 siste ledd. Source: R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.5

Step 2 — Classify Each Requirement

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement dictates a purely prescriptive statutory duty of the municipality regarding the outcome (the obligation to fulfill a decision granting a private party rights to services) and contains no discretionary space.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement concerns the legal right and authority of the municipality to file a lawsuit, which is an implicit permissive legal power assumed by the law.

Requirement: [SUBSTANTIVE LEGAL OBLIGATION] Justification: The requirement establishes the substantive legal threshold and conditions (intentional or grossly negligent misrepresentation) bounding the authority's discretionary power to reverse a decision to the detriment of a private party.

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The finding explicitly states that whether this mandatory causality test requires a separate legal source or is implied is "genuinely ambiguous". *Note: Ambiguous — recommend human legal review.*

Requirement: [PROCEDURAL/DOCUMENTATION] Justification: The finding notes that whether non-detrimental reversal pathways remain available is an "interpretive question not resolved by the text" and that "genuine ambiguity exists". *Note: Ambiguous — recommend human legal review.*

Step 3 — Structured Entry

Requirement Reference: 4 **Finding Reference:** Requirement 4 of 5 **Circular/Source:** R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.4 **Nature of Procedural Requirement:** The authority is required to execute an additional, mandatory evaluative step to assess and show that the decision would not have had the same content if the correct information had been provided. **Legal Gap:** While the Social Services Act § 49 a grants an open discretionary power of assessment ("kan") with only one condition for reversal (intentional/grossly negligent misrepresentation), the circular imposes a wholly new, mandatory fixed causality criterion ("må saken i tillegg framstå slik") that lacks an express textual basis in the statute. **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** Requirement 5 of 5 **Circular/Source:** R-35 pkt. 5.49a.1 — PROC-REQ-5.49a.1.5 **Nature of Procedural Requirement:** The municipality must consider or utilize administrative pathways under other rules within forvaltningsloven § 35, including its final paragraph, when evaluating decision reversals. **Legal Gap:** The Social Services Act § 49 a specifically limits detrimental reversal to forvaltningsloven § 35 first paragraph letter c under specific conditions, and the text does not resolve whether the extension to other rules in forvaltningsloven § 35 authorized by the circular is permitted or excluded. **Thematic Category:** [OTHER] (This defines alternative legal avenues available for administrative processing and evaluation, rather than a specific step-by-step or documentation process).

Step 1 — Extract All Requirements for Process inflation(§ 50)

Requirement 1: "NAV-kontoret skal sikre at saken er så godt opplyst som mulig før det treffes en avgjørelse..." Source: Veileder om økonomisk stønad etter sosialtjenesteloven (operationalizing R-35 § 18)

Requirement 2: "Hvor mye som skal kartlegges må vurderes individuelt i hver sak..." Source: Veileder om økonomisk stønad

Requirement 3: "NAV-kontoret bør derfor innledningsvis i kartleggingen søke å avklare hvor lenge brukeren vil ha behov for hjelp fra NAV." Source: Veileder om økonomisk stønad

Requirement 4: "Hvis henvendelsen gjelder hjelp i en nødsituasjon, må søknaden vurderes raskt, helst samme dag." Source: Veileder om økonomisk stønad

Requirement 5: "NAV-kontoret må gjøre en konkret og individuell vurdering av hvordan opplysningene skal dokumenteres." Source: Veileder om økonomisk stønad

Requirement 6: "Hovedprinsippet for behandling av søknader er derfor at det må foretas individuelle vurderinger basert på opplysninger fra kartleggingen." Source: Veileder om økonomisk stønad

Requirement 7: "Det skal foretas en skjønnsmessig vurdering i hver enkelt sak..." Source: Veileder om økonomisk stønad

Requirement 8: "NAV-kontoret må alltid ivareta hjelpebehovet inntil andre muligheter kan benyttes." Source: Veileder om økonomisk stønad

Requirement 9: "Ved vurdering av søknad om stønad til familier skal det ikke tas hensyn til barnetrygd og barns inntekt..." Source: Veileder om økonomisk stønad

Requirement 10: "...det skal alltid vurderes om stønad kan innvilges etter denne bestemmelsen." Source: Veileder om økonomisk stønad

Requirement 11: "...skal det stilles vilkår om aktivitet med mindre tungtveiende grunner taler mot det." Source: Kommunebrev 2025

Requirement 12: "Rett til kvalifiseringsprogram skal vurderes før det stilles vilkår om aktivitet." Source: Kommunebrev 2025

Requirement 13: "...er barn berørt og du må vurdere hva som er til det beste for barnet i den enkelte saken." Source: Barnets beste – veileder

Requirement 14: "Nav-kontoret må alltid foreta en konkret vurdering av lovlig opphold... med utgangspunkt i søknadstidspunktet." Source: Veileder lovlig opphold for EØS-borgere

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Step 2 — Classify Each Requirement

Requirement 1: [PROCEDURAL/DOCUMENTATION] Justification: It dictates the administrative process by requiring caseworkers to ensure a case is as well-illuminated as possible before making a decision.

Requirement 2: [PROCEDURAL/DOCUMENTATION] Justification: It dictates an evaluation procedure regarding the extent of individual mapping required in each case.

Requirement 3: [PROCEDURAL/DOCUMENTATION] Justification: It dictates an initial sequential step in the mapping process to clarify the expected duration of the user's need.

Requirement 4: [PROCEDURAL/DOCUMENTATION] Justification: It prescribes the timeline and administrative speed for evaluating applications in emergency situations.

Requirement 5: [PROCEDURAL/DOCUMENTATION] Justification: It dictates how caseworkers must assess and handle the documentation of information.

Requirement 6: [PROCEDURAL/DOCUMENTATION] Justification: It establishes the primary administrative procedure for processing applications, relying on individual mapping.

Requirement 7: [PROCEDURAL/DOCUMENTATION] Justification: It mandates the administrative process of carrying out a discretionary assessment in every individual case.

Requirement 8: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It imposes a substantive duty on the municipality by mandating that the assistance need is always met until alternatives are available. *(Noted here, do not proceed to Step 3)*

Requirement 9: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It dictates the legal threshold of the financial decision by expressly prohibiting the inclusion of child benefit and children's income in the assessment. *(Noted here, do not proceed to Step 3)*

Requirement 10: [PROCEDURAL/DOCUMENTATION] Justification: It dictates a mandatory assessment procedure to always evaluate if a benefit can be granted under the provision.

Requirement 11: [SUBSTANTIVE LEGAL OBLIGATION] Justification: It dictates the legal content and outcome of the decision by mandating that activity conditions be set unless weighty reasons oppose it. *(Noted here, do not proceed to Step 3)*

Requirement 12: [PROCEDURAL/DOCUMENTATION] Justification: It dictates a mandatory step-by-step sequential procedure for the casework process prior to imposing activity conditions.

Requirement 13: [PROCEDURAL/DOCUMENTATION] Justification: Ambiguous — recommend human legal review; it dictates an evaluation procedure regarding the best interests of the child.

Requirement 14: [PROCEDURAL/DOCUMENTATION] Justification: It dictates an assessment procedure fixed to a specific administrative time anchor (the time of application).

Step 3 — Structured Entry

Requirement Reference: 1 **Finding Reference:** ORPHAN — PROC-REQ-18.1 **Circular/Source:** Veileder om økonomisk stønad etter sosialtjenesteloven (operationalizing R-35 § 18) **Nature of Procedural Requirement:** The caseworker must ensure the case is fully illuminated before a decision is reached. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 2 **Finding Reference:** ORPHAN — PROC-REQ-18.2 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must individually evaluate the necessary extent of mapping in each case. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 3 **Finding Reference:** ORPHAN — PROC-REQ-18.3 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must attempt to clarify the expected duration of the user's assistance needs at the beginning of the mapping process. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [SEQUENCE]

Requirement Reference: 4 **Finding Reference:** ORPHAN — PROC-REQ-18.4 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must assess emergency applications quickly, preferably on the same day. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 5 **Finding Reference:** ORPHAN — PROC-REQ-18.5 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must make a concrete, individual assessment regarding how information should be documented. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [DOC-REQ]

Requirement Reference: 6 **Finding Reference:** ORPHAN — PROC-REQ-18.6 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must process applications using individual assessments based on mapped information. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 7 **Finding Reference:** ORPHAN — PROC-REQ-18.7 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must conduct a discretionary evaluation in every single case. **Legal Gap:** The

requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 10 **Finding Reference:** ORPHAN — PROC-REQ-18.10 **Circular/Source:** Veileder om økonomisk stønad **Nature of Procedural Requirement:** The caseworker must always assess whether a benefit can be granted. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it invokes § 18 and § 19, neither of which are present in the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 12 **Finding Reference:** ORPHAN — PROC-REQ-18.12 **Circular/Source:** Kommunebrev 2025 **Nature of Procedural Requirement:** The caseworker must assess the right to a qualification program before setting conditions about activity. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [SEQUENCE]

Requirement Reference: 13 **Finding Reference:** ORPHAN — PROC-REQ-18.13 **Circular/Source:** Barnets beste – veileder **Nature of Procedural Requirement:** The caseworker must evaluate what constitutes the best interests of the child in cases where children are affected. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it links to § 18 and Grunnloven § 104, neither of which are present in the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Requirement Reference: 14 **Finding Reference:** ORPHAN — PROC-REQ-18.14 **Circular/Source:** Veileder lovlig opphold for EØS-borgere **Nature of Procedural Requirement:** The caseworker must always make a concrete assessment of lawful residence specifically anchored to the time of application. **Legal Gap:** The requirement lacks a statutory baseline (MANGLER_HJEMMEL) because it is linked to § 18, which is completely absent from the source document (Dokument A). **Thematic Category:** [ASSESS-PROC]

Step 1 — Extract All Requirements for Process inflation(§ 51)

Based on the provided Track A deviation analysis finding, there are **zero** requirements to extract. The source document explicitly states the following:

- "Dokument B (Rundskriv 35, § 51 mapping) yields **zero operational requirements** on NAV staff or the municipal administration".
- "Total documentation requirements in paragraph: 0" and "Total from supplementary documents: 0".
- "Total requirements analyzed: 0".
- The single entry mentioned in the text (PROC-REQ-51.1) is explicitly dismissed as a requirement, with the finding stating: "It is not a circular requirement imposing duties on case-processors; it is a descriptive paraphrase of the law. It therefore does **not** constitute a 'Rundskriv-krav' within the meaning of Dokument B's extraction framework".

Step 2 — Classify Each Requirement

Not applicable. Because zero requirements exist in the provided finding, there are no requirements to classify into either [PROCEDURAL/DOCUMENTATION] or [SUBSTANTIVE LEGAL OBLIGATION].

Step 3 — Structured Entry

Not applicable. Because there are no requirements classified as [PROCEDURAL/DOCUMENTATION] in Step 2, there are no structured entries to produce.

Step 1 — Extract All Requirements for Process inflation(§ 51 a)

Based on the provided Track A deviation analysis finding, there are **zero (0) extractable requirements**.

The source explicitly states that Dokument B (Rundskriv 35, § 51 a, section 6.51a.1) contains no extractable requirements ("krav"), noting that "no obligations, procedures, documentation duties, or behavioural commands directed at caseworkers or municipalities are stated". Furthermore, the aggregated summary confirms that the total number of requirements analyzed is zero.

Because there are no requirements present in the source, none can be listed.

Step 2 — Classify Each Requirement

Not applicable. Because zero (0) requirements were identified and extracted in Step 1, there are no requirements to classify.

Step 3 — Structured Entry

Not applicable. Because there are no requirements classified as [PROCEDURAL/DOCUMENTATION] in Step 2, no structured entries can be produced.