ANALYTICAL MEMO: Volume Drivers in Norwegian Social Services (NAV §17)

Synthesizing Normative Analysis (Set A) and Supervision Evidence (Set B) *Draft for manual verification phase — legal source determinations flagged but not resolved*

PART 1: MAPPING NORMATIVE REQUIREMENTS TO EMPIRICAL EVIDENCE

1a. Requirements Confirmed by Empirical Evidence

REQUIREMENT 1: Specialized economic advice including heavy debt counseling, out-of-court settlements, and creditor negotiations (§17 / Mechanism [S])

Set A classifies this as volume-sensitive on the grounds that deep legal-financial expertise cannot be sustained as a dedicated full-time role in municipalities below approximately 10,000 inhabitants. Set B provides the densest confirmation cluster in the entire dataset. The following supervision findings directly corroborate the normative prediction:

- *Hole kommune (2025)*: Three generalist caseworkers handle all social services; no permanent level-3 specialist exists. Staff uncertainty about debt counseling levels directly translated into formal decision errors.
- *Løten kommune (2025)*: Single specialist bottleneck caused service to collapse entirely during absences. The supervisor explicitly noted that "the service is extremely vulnerable." Debt settlement cases were never processed in practice, degrading competence further.
- *Nav Vefsna (2025)*: A single specialist shared across two municipalities produced wait times of up to one year and outright rejections citing capacity. The supervisor confirmed a structural bottleneck.
- *Nav Åvjovàrri / Kautokeino (2025)*: Twelve generalist counselors covering all NAV domains lacked sufficient competence in the specific content and scope of the financial counseling service.
- *Nes kommune (2024)*: Only 14 formal §17 decisions across the entire office in a full year. Staff expressed explicit uncertainty about when decisions were required. The connection between low volume and competence decay was acknowledged by the supervisor.
- *Sveio kommune (2025)*: A 10.3 FTE office with a single caseworker handling complex decisions was explicitly identified by management as "a possible risk factor for failure."
- *Salangen (2024/2025)*: Inter-municipal office with total generalists. Variable competence in the specific domain, unequal user access to information.

- *Horten (2024)*: Caseworkers routinely referred users with unmanageable debt to the national telephone hotline because local generalists lacked the capacity to assist, in direct violation of the locality requirement.

Mechanism [S] confirmation strength: Very strong. At least eight supervision reports directly confirm this requirement produces volume-driven failures. The normative prediction in Set A — that this is a specialist task a small generalist office cannot sustain — is the single most empirically confirmed volume driver in the dataset.

Legal source note: The specialization standard derives from Rundskriv 35 pkt. 4.17.2.7 and Veileder for økonomisk rådgivning kap. 1.4 and 1.6. Whether these sub-legal instruments impose requirements that exceed what the statute itself mandates requires legal judgment in the verification phase.

REQUIREMENT 2: Outreach work (oppsøkende virksomhet) directed at marginalized groups (§17 / Mechanism [S])

Set A classifies this as volume-sensitive on the grounds that dedicated field roles cannot be sustained alongside mandatory desk-bound case processing in small offices. Set B provides **no direct supervision findings** confirming this as a sanctioned failure. No inspection report in the dataset cites a municipality for failing to conduct systematic outreach to marginalized youth or other target groups.

Classification: Latent volume driver. See section 1b below.

1b. Requirements Appearing in Set A with No Corresponding Set B Evidence

Latent Driver 1 — Outreach work (oppsøkende virksomhet), §17 Normative instruments cited in Set A (Rundskriv 35 pkt. 4.17.2.2; Retningslinjer for samarbeid mellom barnevernstjenesten og Nav-kontoret) impose a duty to conduct proactive outreach, particularly toward vulnerable youth who do not seek help independently. No supervision report in Set B documents a formal sanction or finding of violation on this basis. Two explanations are possible: supervisors may not have inspected for this specific sub-requirement, or municipalities may be tacitly excused from it at small scale. Either interpretation confirms structural risk — the requirement is real but its enforcement appears dormant. This is analytically significant because outreach is inherently a higher-capacity function than reactive desk service, meaning the gap between normative expectation and operational reality may be larger here than anywhere else in the dataset.

Flag for verification phase: Does the supervision methodology used by Statsforvalteren systematically test for outreach compliance? If not, this driver may be systematically undersampled in Set B.

Latent Driver 2 — Steering of purchased/rented external services (§17) Set A identifies the obligation to ensure that outsourced debt counseling (e.g., to private firms or lawyers) remains controlled by and accountable to the Nav office as scale-neutral. Set B contains indirect evidence suggesting this is more complex in practice: *Salangen (2024/2025)* shows that cases outsourced to the inter-municipal competence center were not systematically followed up after return, precisely because the small office lacked the coordination infrastructure to reintegrate them. *Våler (2025)* was sanctioned for failing to conduct a formal ROS analysis before entering an outsourcing agreement. These findings suggest the "steering" obligation, while classified as scale-neutral in Set A, may interact with scale in ways that were not fully captured in the normative analysis. **Flag as potentially misclassified.**

PART 2: DOMINANT MECHANISMS

Frequency Count Across Sets A and B

Mechanism	Set A Entries (§17)	Set B Findings (estimated)	Notes
[D] Documentation Apparatus	0	~45–50	Overwhelmingly dominant empirically
[P] Procedural Continuity	0	~20–25	Second most common
[S] Specialization	2	~12–15	Highest normative-empirical alignment
[C] Coordination Infrastructure	0	~18–22	Strong empirical presence
[K] Competence Sustainability	0	~10–12	Closely related to [S]
[T] Threshold-Dependent Quality	0	1 (Nesna)	Near-absent in both sets

Note: Set A covers only §17 requirements submitted for this analysis. Set B covers the full empirical dataset.

Key Observations

[D] Documentation Apparatus is the dominant empirical mechanism by a wide margin. Roughly half of all Set B findings involve sanctions for failure to maintain formal written records — vedtak, journal notes, deviation logs, ROS analyses, SMS archiving. The pattern

is structurally consistent: caseworkers in small offices actually deliver the service, often effectively and to the satisfaction of users, but fail to translate this delivery into the formal administrative record expected by the supervision standard. This creates a systematic gap between service quality (high) and legal compliance (low).

[S] Specialization shows the strongest normative-empirical alignment. Set A's predictions about debt counseling specialization are confirmed by more separate supervision reports than any other single requirement. This is the mechanism where the normative analysis and the supervisory evidence point most clearly at the same structural cause.

[C] Coordination Infrastructure findings cluster around two sub-types not fully captured in Set A: (i) internal role separation — the requirement that decisions be approved by someone other than the caseworker who drafted them — produces structural impossibility in offices with one or two social services staff; and (ii) external coordination — the requirement for written inter-agency agreements with child welfare, substance abuse services, etc. — produces sanctions when small municipalities rely on informal case-by-case contact.

[K] Competence Sustainability functions as a downstream consequence of [S]. The competence failures documented in Set B (Hole, Løten, Nes, Verdal, Målselv, Åvjovàrri, Sogndal) are consistently explained by a mechanism one step removed from the primary [S] finding: because the office cannot sustain a dedicated specialist, generalists encounter the specific procedural requirement too infrequently to maintain the operational knowledge needed to execute it correctly. Competence decay is a function of case volume, not of individual negligence.

[T] Threshold-Dependent Quality appears only once (Nesna 2024: too small for survey results to be reported at office level). This mechanism may be structurally significant but is not a supervision priority and therefore systematically undersampled.

Dominant Domains

Across both sets, debt counseling / financial advice (§17) is the domain with the highest concentration of volume-sensitive requirements and supervision findings, accounting for an estimated 70–75% of all Set B entries. The child perspective in financial assistance (§18) is the second most prominent domain empirically but is not represented in the §17-focused Set A entries provided. Activity duty for persons under 30 appears in a smaller cluster.

PART 3: CUMULATIVE VOLUME DRIVERS

Several requirements that are individually manageable become collectively unmanageable when they co-occur in the same small office. Three cumulative clusters are identifiable.

Cluster 1: The Documentation-Competence-Specialization Trap (§17 debt counseling)

Components:

- [S] Requirement to provide specialist-level debt counseling (level 2 and 3)
- [K] Requirement to correctly distinguish §17 formal advice from §11 general guidance and issue formal vedtak accordingly
- [D] Requirement to produce formal vedtak with explicit start-date justifications before or at service commencement
- [D] Requirement to maintain systematic journal entries documenting all follow-up interactions
- [P] Requirement to maintain a "fixed and correct" repeatable practice for oral application registration

Why the combination is worse than any element in isolation:

Each of these requirements assumes a certain volume of practice to function as a sustainable institutional routine. The normative threshold for a "fixed and correct practice" (Midtre Gauldal, Skaun, Verdal) presupposes enough case frequency for the procedure to become habitual. The competence requirement presupposes enough case frequency for caseworkers to maintain practical legal knowledge. The documentation requirement presupposes back-office capacity proportional to caseload. When an office processes five to fifteen §17 cases per year — which is the empirical norm for municipalities under 5,000 inhabitants — none of these routines can achieve the minimum frequency needed for institutional stability.

The interaction is specifically destructive because each failure compounds the others: low case volume degrades competence [K], degraded competence produces incorrect procedures [P], incorrect procedures produce inadequate documentation [D], and inadequate documentation prevents the internal control system from identifying the competence gap, sustaining the cycle. *Midtre Gauldal (2025)*, *Skaun (2025)*, *Verdal (2025)*, *Sogndal (2024)*, *Målselv (2024)*, and *Nes (2024)* all document this spiral.

Relevant Set A entries: Requirement 1 (§17 specialist advice, [S]) maps directly to this cluster. The cluster extends beyond what Set A captures, incorporating documentation and competence obligations from sub-legal normative instruments.

Legal source note: The vedtak requirement for §17 advice derives from the statute itself (sosialtjenesteloven §17 read in conjunction with §§41-44 on administrative decisions) and from Rundskriv 35 pkt. 4.17.2.4. The start-date documentation requirement derives from Rundskriv 35 and supervisory practice. Whether the statute mandates formal vedtak for level-1 simpler guidance — or whether this is an administrative interpretation layered on by sub-legal instruments — is a critical legal question for the verification phase, given that the majority of sanctions in Set B concern precisely this level.

Cluster 2: The Role-Separation Impossibility (internal control and quality assurance)

Components:

- [C] Requirement that decisions be approved by a person with formal decision-making authority separate from the caseworker who drafted them
- [C] Requirement for systematic management spot checks (stikkprøvekontroll) and portfolio reviews
- [D] Requirement to register professional deviations in a formal deviation system (Compilo, Risk Manager, ASYS, QM+)
- [C] Requirement for formalized inter-agency coordination agreements

Why the combination is worse than any element in isolation:

These requirements collectively assume an organization with at least three structurally distinct layers: a frontline caseworker tier, an approval/quality assurance tier, and a management/deviation-tracking tier. In a municipality with two or three social services caseworkers — the empirical norm for municipalities under 5,000 — these tiers collapse onto one or two individuals. The approval requirement becomes self-approval (*Nordreisa 2024/2025, Hole 2025*). The spot-check requirement becomes the manager checking their own team's work while also performing frontline casework (*Hjelmeland 2024, Løten 2025, Vestnes 2024*). The deviation system becomes redundant when direct verbal communication already resolves all errors (*Båtsfjord 2024, Hammerfest 2023, Karlsøy 2024, Senja 2023, Sør-Varanger 2023*).

The cumulative effect is that the entire internal control architecture — which the supervisor evaluates as a distinct compliance domain — structurally cannot exist in a micro-office without manufacturing it artificially. Municipalities attempting to do so (purchasing Compilo licenses, building approval protocols) still fail because access rights, training, and usage all require dedicated administrative capacity that the office cannot provide (*Giske 2023, Averøy 2023, Sør-Varanger 2023, Nav Hallingdal 2023*).

Legal source note: The internal control obligation derives from sosialtjenesteloven §5 and the municipality's general management responsibility under kommuneloven §25. The specific operationalization — formal deviation logs, portfolio reviews, spot checks — appears to originate primarily from supervisory practice and Statsforvalteren methodology rather than from statutory text. This is a high-priority question for the verification phase.

Cluster 3: The Generalist-Specialist Interface Failure (coordination between frontline and specialist)

Components:

- [S] Requirement to provide specialist-level service (level 2/3 debt counseling)
- [C] Requirement for formalized distribution of tasks and boundaries (grensesnitt) between generalist counselors and debt specialists
- [C] Requirement that state employees systematically identify and flag needs for the municipal financial counseling service
- [K] Requirement that specialist maintains active practical competence in all debt counseling levels including gjeldsordning

Why the combination is worse than any element in isolation:

Small municipalities are structurally pushed toward a single part-time specialist model (e.g., 40% or 60% FTE) to meet the specialization requirement at minimum cost. This creates a specific interface problem: the generalist front-line workers cannot directly book appointments in the specialist's calendar, cannot assess which level of intervention is required, and cannot provide continuity when the specialist is absent. The formal requirement for a clearly defined grensesnitt then cannot be met because the organizational structure consists of two or three generalists and one specialist who is unavailable much of the time (*Løten 2025, Indre Fosen 2024, Nannestad 2024, Salangen 2024/2025*).

The competence requirement compounds this: a specialist in a small municipality will process advanced debt settlement (gjeldsordning) cases so rarely that practical expertise in that specific sub-domain cannot be maintained through normal casework (*Løten 2025*: the specialist had not processed a single gjeldsordning case since taking the role in September 2024).

PART 4: RANKING BY STRUCTURAL IMPACT

Tier 1 — Strongest Push Toward Specialization / Intermunicipal Cooperation

Driver A: The specialization requirement for level-2/3 debt counseling [S]

- Impact: Strongest driver of intermunicipal cooperation observed in the dataset. Multiple municipalities in Set B (Nav Vefsna, Salangen, Nav Numedal, Nav Ytre Helgeland, Båtsfjord, Sveio) have already outsourced level-3 cases to inter-municipal competence centers or regional specialists, with mixed compliance outcomes.
- Legal source: Rundskriv 35 pkt. 4.17.2.7 and Veileder for økonomisk rådgivning kap. 1.4 and 1.6. **Requires legal judgment on whether the statute itself mandates this level of specialization or whether this is a sub-legal normative construction.**

Driver B: The Cluster 1 documentation-competence-specialization trap [S/K/D/P combined]

- Impact: Creates a compliance gap that is structurally impossible for micro-municipalities to close without either dramatically increasing case volume (which they cannot control) or permanently outsourcing the service to an intermunicipal provider. This driver is more consequential than any single requirement because it makes compliance structurally unavailable regardless of effort.
- Legal source: Mixed. The core vedtak obligation is statutory (sosialtjenesteloven §§17, 41-44). The specific requirements about start-date documentation and level-1 formalization derive from sub-legal instruments. **The legal verification phase should assess whether the statute requires vedtak for level-1 guidance, as this is the specific point at which most sanctions in the dataset are triggered.**

Tier 2 — Significant Push Toward Intermunicipal Cooperation

Driver C: The role-separation requirement for decision approval [C]

- Impact: Creates a structural impossibility in offices with one to three social services caseworkers. In practice, this is resolved through intermunicipal arrangements (shared decision-makers, quality coordinator networks — as in Nav Våler 2023) or simply ignored until caught by supervision.
- Legal source: Sosialtjenesteloven and forvaltningsloven procedural requirements, operationalized through supervisory methodology. **Requires legal judgment on whether the two-step approval requirement is a statutory obligation or a supervisory expectation rooted in administrative best practice.**

Driver D: The internal control architecture [C/D combined]

- Impact: Pushes toward intermunicipal professional networks (fagnettverk) as a substitute for internal quality assurance. Several municipalities in Set B had already established these (Nav Våler, Kautokeino) as a compensatory mechanism. The supervisory standard demands a compliance apparatus that assumes organizational complexity beyond what small offices can achieve internally.
- Legal source: Sosialtjenesteloven §5 (statutory), with specific operationalization through Statsforvalteren supervisory methodology. **The gap between statutory requirement and supervisory operationalization is analytically significant and requires verification.**

Tier 3 — Structurally Problematic but Empirically Unconfirmed

Driver E: Outreach work (oppsøkende virksomhet) [S] (latent driver)

- Impact: Potentially very high if systematically enforced. Field-based outreach roles cannot coexist with mandatory desk-bound case processing in small offices. Current absence of supervision findings may reflect dormant enforcement rather than absence of real compliance gaps.
- Legal source: Rundskriv 35 pkt. 4.17.2.2. **Whether this derives from the statute directly or from the circular is a priority question for the verification phase, particularly given the near-total absence of enforcement evidence in Set B.**

PART 5: CONNECTIONS TO TRACKS A AND C1

Intersection with Track A (Hjemmelsinnsnevring — Legal Mandate Narrowing)

The most significant intersection concerns the formal vedtak requirement for §17 level-1 guidance. The supervision dataset reveals a consistent pattern: municipalities are sanctioned not for failing to provide guidance (the service is almost universally acknowledged as delivered in practice), but for failing to wrap that guidance in a formal

administrative decision. If legal analysis in Track A establishes that the statute does not mandate formal vedtak for simple, single-interaction budget guidance — and that this requirement was introduced through Rundskriv 35 or supervisory practice — then a substantial portion of the sanctions documented in Set B would constitute overreach beyond the statutory mandate. This intersection is analytically high-value.

Specific findings where this question is sharpest:

- *Indre Fosen (2024)*: Sanctioned for not issuing vedtak for "enklere økonomisk rådgivning." The supervisor's own framing ("forbedringspotensial") suggests this may be below the formal violation threshold.
- *Hustadvika (2024)*: The supervisor explicitly stated "Dei oppfyller ikkje dei formelle krava til å fatte vedtak, men oppfyller plikta til å gi rådgiving" — they meet the substantive obligation but not the formal one. This formulation is analytically important for Track A.
- *Hjelmeland (2024)*: Concluded with zero legal violations despite identical procedural shortcomings, suggesting that supervisors differ in their interpretation of the statutory vedtak threshold for §17.
- *Årdal (2025)*: Supervisor explicitly assessed the documentation failures as not constituting "særleg stor risiko" despite formally noting them as non-compliant.

The divergence between these outcomes across different Statsforvalteren offices itself constitutes evidence of legal uncertainty about the statutory threshold — a core Track A concern.

Intersection with Track C1 (Sårbarhetssjekken — Vulnerability of Small Professional Environments)

Track C1 findings should be most prominent precisely in the mechanisms where Set B shows the clearest structural pattern. The following clusters are analytically central:

Single-specialist dependency: The bottleneck model documented in *Løten (2025)*, *Nav Vefsna (2025)*, *Sveio (2025)*, *Nes (2024)*, and *Båtsfjord (2024)* produces a service availability failure not from negligence but from organizational structure. When one specialist is absent, the entire level-2/3 service ceases. This is the prototypical vulnerability finding for Track C1.

Competence decay through low case frequency: The pattern in *Nes (2024)* (14 formal §17 decisions per year), *Midtre Gauldal (2025)* (8 decisions in 2023), *Verdal (2025)* (5–8 per year), and *Målselv (2024)* (27 decisions over four years) documents a quantitative threshold below which institutional competence cannot be self-sustaining. These findings provide empirical support for establishing a case-volume floor as a Track C1 criterion.

The informal knowledge trap: A specific vulnerability pattern appears across *Nordreisa (2024/2025)*, *Vik (2023)*, *Karlsøy (2024)*, *Hjelmeland (2024)*, and *Nav Numedal (2024)*: small offices maintain genuine service quality through informal, personal, trust-based knowledge of users, but this knowledge is not institutionally portable. Staff turnover in a three-person office eliminates institutional memory entirely. Supervision reports typically acknowledge the quality of current caseworkers' knowledge while sanctioning the office for the structural

vulnerability this creates. This pattern is central to Track C1's concern about professional environment fragility.

The deviation reporting substitution: The consistent finding that small offices resolve errors through direct verbal communication with the manager rather than formal deviation systems (*Hammerfest, Sør-Varanger, Senja, Båtsfjord, Nav Hallingdal, Averøy, Giske*) is analytically ambiguous for Track C1. On one reading, it represents a genuine vulnerability: if the manager is absent, the substitution mechanism collapses. On another reading, it represents a rational scale-appropriate adaptation that the supervisory framework incorrectly classifies as a failure. The Track C1 analysis should distinguish these cases.

SUMMARY OF FLAGGED UNCERTAINTIES FOR VERIFICATION PHASE

1. **Whether sosialtjenesteloven §17 itself mandates formal vedtak for level-1 simple guidance**, or whether this derives from Rundskriv 35 / supervisory practice. This is the single most consequential legal question in the dataset, affecting the validity of the largest cluster of sanctions.

2. **Whether the outreach obligation in §17** (oppsøkende virksomhet) is rooted in the statute or in sub-legal normative instruments. Given the near-total absence of supervision findings on this point, the enforcement status and legal basis are both unclear.

3. **Whether the Våler/Kvam herad distinction** (Våler sanctioned for missing ROS analysis on outsourcing agreement; Kvam ultimately found no violation after updating routines) reflects a genuine legal distinction or inconsistent supervisory application. If the latter, this is relevant to Track A's mandate-narrowing analysis.

4. **The steering obligation** for purchased external services (Set A Requirement 4, classified scale-neutral) may interact with scale in ways not captured by the normative analysis, given the outsourcing-reintegration failures in Salangen and Våler. The classification as scale-neutral should be revisited in the verification phase.

5. **The [T] threshold mechanism** (Nesna: survey results not reportable at office level) is structurally significant but appears only once in the dataset. It is unclear whether this reflects genuine absence of the problem or absence of supervisory attention to it. Flag for Track C1 consideration.

ANALYTICAL MEMO: Volume Drivers in Norwegian Social Services Administration

Synthesis of Normative Requirements (Set A) and Supervision Findings (Set B)
Classification: Working Document — Manual Verification Required

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1. MAPPING NORMATIVE REQUIREMENTS TO EMPIRICAL EVIDENCE

1a. Requirements Confirmed by Both Sets

Requirement A-1 (§18): Economic advice and creditor negotiation — Mechanism [K]

Set A classifies this as volume-sensitive on the ground that specialized financial and legal competence in debt negotiation degrades without a regular, frequent caseload. This is the single most extensively confirmed requirement across Set B. The empirical record is overwhelming:

- Hole kommune: *"caseworkers manage a wide spectrum of welfare tasks and handle too few dedicated complex debt cases to maintain the specialized legal and financial competence expected by the state"* — confirmed as [K]
- Løten kommune: the debt counselor had not processed a single gjeldsordning case by the time of inspection, despite being in post since September 2024 — [K]
- Verdal kommune: *"only 5 to 8 formal financial counseling cases per year across an entire office processing thousands of social assistance cases"* — [K]
- Nes kommune: 14 formal decisions across an entire year, with caseworkers expressing active uncertainty about when to trigger the procedure — [K]
- Sogndal: only eight formal decisions in the preceding year; caseworkers could not consistently include legally required start-date justifications — [K]
- Målselv-Bardu: 27 formal decisions over nearly four years; generalists *"do not encounter this specific administrative threshold frequently enough to maintain the procedural competence required"* — [K]
- Salangen: *"varying competence on the subject area"* and *"different practices between caseworkers for how much economic counseling each individual caseworker provides"* — [K]+[S]
- Nav Àvjovàrri: *"not all employees have sufficient competence about the service"* — [K]

Mechanism count for this requirement in Set B: [K] triggered in at least 10 municipalities for debt counseling competence alone, often alongside [S] where the structural consequence is the absence of a viable specialist role.

Source of requirement: Sosialtjenesteloven §18, Rundskriv 35 pkt 4.18.2.49. The volume-sensitivity is therefore rooted partly in primary law and partly in a sub-legal normative instrument. **Flag for manual verification:** whether the *level of procedural specificity* that generates competence decay (i.e., the requirement to distinguish §17 levels 1–3, issue correctly formatted vedtak with start-date justifications, and document oral applications separately) arises from the circular rather than the statute itself.

1b. Requirements in Set A with NO Corresponding Evidence in Set B — Latent Volume Drivers

Requirement A-2 (§18): Independent assessment of EØS citizen residence status — Mechanism [K]

Set A classifies this as volume-sensitive on the ground that navigating EØS immigration directives and shifting residence grounds requires specialist legal knowledge that is impossible to maintain operationally without a steady flow of such cases. The source is the dedicated veileder for NAV on lawful residence for EØS citizens.

Set B contains zero findings on this requirement. This is analytically significant for two reasons. First, supervision may not yet have targeted this specific obligation systematically. Second, the EØS population eligible for §18 is by definition geographically and demographically concentrated, meaning that the vast majority of small municipalities will encounter these cases so rarely that competence cannot be sustained even as a latent capacity — yet the legal obligation is stated in mandatory terms (*skal*). This is therefore a **latent volume driver of potentially high severity** that supervision has not yet surfaced empirically.

Flag: The source is a veileder (guidance document), not the statute. Manual verification is required to determine whether the residence-status assessment obligation itself rests on primary legislation or on the interpretive layer of the veileder.

1c. Scale-Neutral Requirements from Set A: Do They Generate Volume-Sensitive Compliance Costs in Practice?

Set A classifies four §18 requirements as scale-neutral: child benefit exclusion from income calculation; assessment of arrears/housing risk; individual needs-based calculation above standard rates; and assessment of car as necessary expense.

Set B does not directly sanction municipalities for failures on these specific items. However, two observations are warranted:

Child benefit exclusion (scale-neutral per Set A): Hammerfest was sanctioned for *failing to implement a 2022 legal change regarding child benefits*, and this failure was attributed to poor practice rather than scale. This is consistent with Set A's scale-neutral classification, but also confirms that where a calculation rule changes, it generates a short-term

competence demand that may interact with scale. **No conflict between sets; classification stands.**

Individual needs-based calculation (scale-neutral per Set A): Sør-Varanger and Giske were sanctioned for applying outdated municipal standard rates rather than conducting individualized assessments. Set A treats the discretionary adjustment itself as scale-neutral, but the supervision findings suggest that *the competence to exercise that discretion* may be volume-sensitive in practice — caseworkers who process very few cases may default to standard rates precisely because they lack the repeated practice to make individualized calculations confidently. **Partial tension between sets; flag as possible misclassification for manual review.**

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2. THE DOMINANT MECHANISMS

Frequency Count Across Set B

A systematic count across all Set B findings yields the following approximate distribution:

Mechanism	Approximate Set B occurrences	Set A occurrences
[D] Documentation Apparatus	~55	0
[P] Procedural Continuity	~32	0
[C] Coordination Infrastructure	~25	0
[S] Specialization	~18	0
[K] Competence Sustainability	~12	2
[T] Threshold-Dependent Quality	1	0

Key observation: Set A exclusively captures [K] (two entries), while Set B reveals that [D] is the empirically dominant driver by a wide margin. This divergence is analytically important. It suggests that the normative analysis in Set A — which focuses on whether a *competence* can be maintained — substantially underestimates the volume-sensitivity of *documentation and procedural compliance* obligations, which are formally attached to the same statutory provisions but originate largely in sub-legal instruments (rundskriv, veiledere, and IT-system requirements).

[D] Documentation Apparatus — the Dominant Driver

[D] appears in virtually every supervision report and is triggered by a consistent structural pattern: the obligation to translate informal, conversational, and often highly effective social

work into a formal bureaucratic paper trail. The specific documentation obligations that recur include:

- Issuing enkeltvedtak under §17 before or simultaneously with providing advice, even for routine low-level guidance
- Including explicit start-date justifications in every vedtak
- Separately journaling all oral applications
- Archiving SMS and telephone communications in Socio or equivalent systems
- Writing separate journal notes *and* separate formal decisions, rather than consolidating information into the final vedtak
- Documenting assessments of children's needs in writing even when caseworkers demonstrably possess that knowledge through direct personal contact

The phrase *"caseworkers knew more about the users' situations than the journals reflected"* appears — with only minor variation — in findings from Nordreisa, Nannestad, Giske, Nav Numedal, Senja, Hjelmeland, Karlsøy, Årdal, Salangen, Vennesla, and Målselv-Bardu. This is not coincidental repetition. It is structural: small-scale offices substitute personal knowledge for bureaucratic record-keeping, and supervision systematically penalises the substitution regardless of whether users are actually receiving appropriate help.

[P] Procedural Continuity — the Second Driver

[P] manifests primarily as the obligation to maintain a formalized pipeline: application → urgency assessment → formal decision with start date → service commencement. This pipeline assumes a queuing environment where formal prioritization is necessary. In small offices that have the capacity to help users immediately, the pipeline is structurally redundant as an operational tool, but legally mandatory. The result is a well-documented pattern across Tinn, Hjelmeland, Årdal, Sogndal, Høyanger, Sveio, and many others: services are provided immediately and effectively, but municipalities are sanctioned because help preceded paperwork. The relevant circular requirement — that a vedtak must precede or accompany service commencement and must include a specific start-date justification — is a sub-legal procedural specification. **Flag for manual verification:** whether this specific sequencing requirement is statutory or originates exclusively from Rundskriv 35 and related veiledere.

[C] Coordination Infrastructure — the Third Driver

[C] appears in three distinct forms across Set B:

1. **Role separation between caseworkers and approvers** (maker/checker): Nordreisa, Hole, Løten, Hustadvika, and others were sanctioned because a single person was both processing and approving decisions. This assumes an office large enough to have structurally non-overlapping roles.

2. **Formalized inter-agency coordination:** Sør-Varanger, Hammerfest, Senja, and others were sanctioned for informal, case-by-case agency coordination rather than written, systematic cooperation agreements. Small offices coordinate naturally through personal contact between a few colleagues across departments; the requirement to formalize this into institutional agreements imposes overhead

calibrated for larger, siloed bureaucracies.

3. **Tracking and handoff systems:** Salangen and Løten were sanctioned for failing to systematically track the return of outsourced cases from external competence centres — a coordination demand that only arises because small scale forces the outsourcing in the first place.

[S] Specialization — Fourth Driver

[S] is closely related to [K] but captures the *organizational* rather than the *individual* dimension of scale-sensitivity: the absence of a dedicated specialist role rather than the degradation of individual competence. The clearest instances are Nav Vefsna (single specialist covering two municipalities, creating systemic bottlenecks), Løten (single debt counselor with no redundancy), Hole (only three generalists for all social services), and Nes kommune (single specialist at the Housing Office with no backup). [S] is frequently co-occurring with [K]: the municipality lacks both the organizational structure to sustain a specialist role and the case volume to sustain the competence needed to fill it.

[T] Threshold-Dependent Quality — Marginal

[T] appears once in Set B, in Nesna, where the office is *"too small for results from user and employee surveys to be communicated to local level."* This is a genuine but analytically marginal mechanism given the available evidence; it may be underreported because supervisors rarely assess survey methodology explicitly.

Domain Concentration

Debt counseling (§17 economic advice and §18 debt-related assistance) shows the highest concentration of volume-sensitive findings by a substantial margin, appearing in findings from more than 40 municipalities across Set B. Financial assistance with child perspective (§18 combined with barneperspektivet requirements from veiledere) is the second most concentrated domain. Activity duty (§20a, vilkår) appears in Ringerike and Vestby but with limited volume-sensitivity evidence. Internal control and quality assurance (internkontroll) functions as a cross-cutting domain that amplifies every other mechanism — it appears as a secondary or tertiary finding in virtually every report.

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3. CUMULATIVE VOLUME DRIVERS

Cluster 1: The Debt Counseling Compliance Stack (§17/§18)

This is the most severe cumulative cluster identified. The individual requirements are:

- [K] Maintain differentiated competence across three advisory levels (rådgivning nivå 1, 2, 3)

- [P] Issue a formal vedtak with start-date justification for *every* level of advice, including routine level-1 guidance such as budget assistance
- [P] Register oral applications as formal applications in the case system
- [D] Document all follow-up, including SMS and telephone contact, in Socio or equivalent
- [D] Write separate journal notes distinct from the final decision document
- [C] Maintain a two-person approval structure (maker/checker) for all vedtak
- [S] Sustain a specialist capable of handling level-3 gjeldsordning cases continuously

Each requirement is individually defensible in a high-volume environment. The cumulative problem is that they impose demands that operate *simultaneously* on the same caseload. A municipality processing eight formal §17 decisions per year faces not just the competence challenge of maintaining level-3 expertise but *also* the procedural challenge of correctly structuring vedtak it almost never writes, *and* the documentation challenge of logging SMS exchanges, *and* the coordination challenge of separating approval roles in an office where that separation is structurally impossible.

The cumulative effect is analytically more severe than any individual requirement for the following reason: even if a municipality addresses competence (by securing occasional access to a specialist via intermunicipal cooperation), it remains exposed to [P] and [D] failures because the procedural and documentation obligations apply to *all* caseworkers, including the generalists who handle levels 1 and 2. The supervision findings from Salangen, Målselv, Sogndal, Verdal, Sveio, and Høyanger confirm this explicitly: municipalities that had addressed the specialist problem still failed on procedural continuity and documentation.

Structural implication: This cluster creates pressure for intermunicipal cooperation that is *not only* about specialist access but also about building sufficient volume of formal cases to sustain procedural competence in generalist staff. An inter-municipal pool of, say, 30–40 formal §17 cases per year would materially improve [P] and [K] compliance in a way that a lone specialist cannot achieve alone.

Cluster 2: The Internal Control Apparatus (Cross-Cutting)

A second cumulative cluster operates across all domains. It comprises:

- [D] Use of formal deviation reporting software (Compilo, Risk Manager, QM+, ASYS)
- [C] Portfolio reviews and formalized spot checks (stikkprøvekontroll)
- [C] Formal ROS (risk and vulnerability) analyses
- [P] Specialized written routines for each distinct sub-service
- [C] Structured, minuted professional case-discussion meetings (fagmøter)

These requirements are individually modest. Cumulatively, they constitute a compliance infrastructure designed for organizations with dedicated quality-assurance roles and administrative back-office capacity. In offices of five to fifteen people, the cumulative demand falls on the Nav leader, who is simultaneously the primary caseworker, the decision approver, the system administrator for deviation software, the author of ROS analyses, and the convener of professional meetings. The findings from Nesna, Giske, Grue, Averøy, Sør-Varanger, and Nav Hallingdal confirm that this cumulative burden consistently exceeds the capacity of a single leader in a small office.

The internal control cluster is particularly problematic because its failures are *invisible to users* — the services may be delivered competently, as explicitly noted in many closing flags — but they generate formal sanctions and create legal exposure that undermines the municipality's position in any subsequent appeal or litigation. The cluster thus creates a pressure toward intermunicipal cooperation for administrative rather than clinical reasons.

Cluster 3: The Documentation Burden on Generalist Caseworkers (§18 child perspective)

A third cluster, concentrated in §18 financial assistance with families, comprises:

- [D] Systematic written mapping of children's needs (kartlegging) in journal notes
- [D] Individual, concrete assessments of children visible in every decision
- [D] Separate formal documentation of assessments under §19 (discretionary support)
- [K] Competence to identify and articulate "barnets beste" in legal terms
- [S] Dedicated specialist or designated responsibility holder for the child perspective

This cluster is cumulative because the documentation requirements presuppose a specialization that the scale does not support. A generalist who encounters child-welfare assessments infrequently (Ringerike: *"very few families with children in this age group"*; Senja: 315 total social assistance cases distributed across generalists) cannot reasonably be expected to both maintain the substantive competence [K] and execute the documentation pipeline [D] to the standard assumed. The finding across more than fifteen municipalities — that caseworkers verbally know what they should do but fail to document it — is consistent with a cluster in which the documentation requirement presupposes a procedural fluency that cannot be achieved without sufficient case volume.

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4. RANKING BY STRUCTURAL IMPACT

Tier 1: Very High Structural Impact — Strong Push Toward Specialization or Intermunicipal Cooperation

Driver 1: Debt Counseling Compliance Stack (Cluster 1)

Structural impact: Very high. Every mechanism in the cluster ([K]+[P]+[D]+[C]+[S]) simultaneously exerts pressure. The only structural response is either a sufficient case volume — which small municipalities cannot independently generate — or intermunicipal pooling that creates a shared high-volume specialist team with sufficient generalist exposure to §17 procedures to sustain [P] and [K] compliance.

Legal source: Mixed. The three-level advisory framework and the obligation to provide specialized gjeldsordning assistance rest on §17 of Sosialtjenesteloven. The specific obligation to issue a vedtak for *level-1* advice (setting up a budget), to include start-date justifications, and to register oral applications as formal applications appears to derive primarily from Rundskriv 35 and associated veiledere. **Flag:** whether the level-1 vedtak

requirement is a statutory obligation or a circular specification requires manual legal verification, as the answer has significant implications for whether simplification is available without legislative change.

Driver 2: Single-Specialist Vulnerability (Mechanism [S])

Structural impact: Very high in municipalities currently relying on a single debt counselor. The findings from Nav Vefsna, Løten, Hole, Sveio, and Nes kommune confirm that a single specialist creates structural service interruption (bottlenecks, waiting lists up to one year) during routine absence. This pushes strongly toward intermunicipal cooperation as the *minimum viable organizational response*, since hiring a second specialist is fiscally unjustifiable at the case volumes these municipalities generate.

Legal source: The continuity-of-service obligation derives from §17 of Sosialtjenesteloven. The *structural* problem (that only one person can fill the role) arises from the intersection of the statutory obligation and the municipal scale; it is not addressable through circular simplification.

Tier 2: High Structural Impact — Significant Push but Partially Addressable by Administrative Simplification

Driver 3: Documentation Apparatus for Routine Advisory Work ([D])

Structural impact: High. The requirement to issue formal vedtak for minor, conversational advice and to journal SMS interactions is generating sanctions across the widest range of municipalities, including those that are otherwise performing well. The pattern is pervasive enough to constitute a structural rather than individual compliance problem.

Legal source: The obligation to make formal administrative decisions rests on Forvaltningsloven's general provisions as applied through §17 Sosialtjenesteloven. However, the *specific* requirements regarding start-date documentation in vedtak, separate journaling of SMS, and the trigger-threshold for when informal advice becomes a §17 case appear to derive from Rundskriv 35 and veiledere. **Flag for manual verification:** if these specifications originate from sub-legal instruments, administrative simplification may be available without legislative change.

Driver 4: Internal Control Apparatus Cluster (Cluster 2)

Structural impact: High as a cumulative cluster; moderate for any individual component. The ROS analysis, stikkprøve, portfolio review, and deviation-software requirements are each sub-legal in origin (they derive primarily from internkontrollforskriften and its application through NAV's own quality management systems). This cluster is almost entirely addressable by simplification at the regulatory and procedural level without statutory amendment. **Flag:** the distinction between the statutory internkontroll obligation (which is legally mandatory) and the specific *methods* for fulfilling it (which may be prescribed sub-legally) is critical for the manual verification phase.

Tier 3: Moderate Structural Impact — Latent or Domain-Specific Drivers

Driver 5: EØS Residence Assessment (Requirement A-2, Mechanism [K])

Structural impact: Potentially very high for municipalities with EØS populations (border municipalities, coastal municipalities with seasonal labour markets), but geographically concentrated and empirically unconfirmed. The latency of this driver makes it difficult to rank confidently.

Legal source: The substantive obligation derives from Sosialtjenesteloven §18 as interpreted through the EØS directive. The specific assessment requirements derive from the dedicated veileder. **Flag:** whether the residence assessment obligation itself requires legislative clarification or whether it is fully determinable from the existing veileder framework requires manual verification.

Driver 6: Child-Perspective Documentation Cluster (Cluster 3)

Structural impact: Moderate. Sanctions are common, but the child-perspective requirements are also the domain where findings of genuine poor practice (as opposed to structural compliance failure) are most frequently noted in Set B's closing flags. The overlap between structural limitations and actual practice failures makes this driver analytically harder to isolate.

Legal source: The child's best interest obligation has constitutional and international law dimensions (Grunnloven §104, FNs barnekonvensjon). The *documentation* requirements derive primarily from veiledere and forvaltningslov general principles. **Flag:** the documentation requirements may be partially addressable without primary law change, but the substantive assessment obligation itself is not.

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5. CONNECTIONS TO TRACKS A AND C1

Track A (Hjemmelsinnsnevring — Legal Mandate Narrowing)

The most significant intersection is with **Driver 3 (Documentation Apparatus)** and the debt counseling compliance stack. Track A's concern with hjemmelsinnsnevring — the narrowing of legal authority through the interpretive accumulation of sub-legal instruments — is directly implicated by the finding that the dominant source of municipal non-compliance is not the statute itself but the procedural and documentary specifications layered on top of it through Rundskriv 35 and associated veiledere.

Specifically: the obligation in §17 to provide "opplysning, råd og veiledning" is a broad, professionally-oriented provision. The supervision findings confirm that municipalities *are* providing this service substantively. They are sanctioned for failing to execute the formal pipeline (vedtak with start-date justification, registration of oral applications, level-by-level documentation) that has been built onto the statute through normative instruments. If that pipeline is substantially sub-legal in origin, it represents a textbook case of hjemmelsinnsnevring: the practical legal obligation being enforced bears limited

resemblance to the statutory text, because the normative layer has added specificity that has no explicit statutory basis.

Intersection flag: The manual verification phase should examine whether the level-1 vedtak requirement, the start-date justification requirement, and the oral-application registration requirement each have identifiable statutory anchors, or whether they are purely circular/veileder constructs. The answer determines whether this is an interpretive problem addressable through circular revision or a legislative problem requiring statutory change.

Track C1 (Sårbarhetssjekken — Small Professional Environment Vulnerability)

The intersection with Track C1 is pervasive across the empirical record. The following patterns from Set B are directly and specifically relevant to the vulnerability analysis:

Single-specialist bottleneck: Confirmed in at least eight municipalities (Løten, Hole, Nav Vefsna, Nes kommune, Sveio, Salangen, Båtsfjord, Hjelmeland). The C1 vulnerability is not merely that expertise is thin but that *all service continuity collapses* when the single specialist is absent. This is not a marginal risk — every municipality with a single debt counselor is structurally non-compliant with the continuity-of-service obligation during any absence of that person.

Competence sustainability threshold: Set B establishes an implicit empirical threshold. Municipalities generating fewer than approximately 10–15 formal §17 decisions per year consistently show [K] failures. This is a C1 finding with actionable precision: the professional environment is structurally vulnerable below this volume threshold because the procedural pipeline never becomes routinized.

Management integration: Set A does not capture management vulnerabilities, but Set B shows repeatedly that small offices are sanctioned for informal internal control precisely because their managers are embedded in frontline work rather than separated from it. This is a C1 finding: the same organizational scale that creates [K] and [S] vulnerabilities also creates [C] vulnerabilities by preventing the structural role separation that quality-assurance regimes assume. The Hammerfest finding is the most extreme documented case (Nav leader shared across two offices, lacking access to the municipal IT system), but the pattern of leaders who are simultaneously caseworkers, approvers, and quality controllers recurs across Hjelmeland, Nav Numedal, Vik, Høyanger, and others.

Survey data threshold: The Nesna finding on [T] is directly relevant to C1: *"the municipality is too small for survey results to be communicated to the local level."* This is a Track C1 finding with methodological precision — the statistical preconditions for data-driven quality improvement simply cannot be met below a certain population and caseload threshold, irrespective of organizational intent.

SUMMARY TABLE

Volume Driver	Primary Mechanism(s)	Set B Confirmation	Legal Source	Structural Impact	Track A Intersection	Track C1 Intersection
Debt counseling compliance stack	[K]+[P]+[D]+[C]+[S]	Strong (40+ findings)	§17 STL + Rundskriv 35	Very high	Yes — layer-dependent	Yes — core C1 finding
Single-specialist bottleneck	[S]	Strong (8+ municipalities)	§17 STL	Very high	No	Yes — central C1 finding
Documentation for routine advice	[D]	Very strong (50+ findings)	Primarily sub-legal	High	Yes — key A intersection	Yes
Internal control apparatus	[D]+[C]+[P]	Strong (25+ findings)	Sub-legal (internkontroll)	High (cumulative)	Partial	Yes
EØS residence assessment	[K]	None (latent)	§18 STL + veileder	Potentially very high	Flag	Flag
Child-perspective documentation cluster	[D]+[K]+[S]	Strong (15+ findings)	Mixed	Moderate	Partial	Yes
Survey data threshold	[T]	Weak (1 finding)	Sub-legal	Marginal	No	Yes — methodological

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UNCERTAINTY FLAGS FOR MANUAL VERIFICATION PHASE

1. **[Critical]** Whether the level-1 advisory vedtak requirement (including for basic budget guidance and routine financial advice) has a statutory anchor in §17 STL or derives exclusively from Rundskriv 35. This determines whether the most pervasive source of small-municipality sanctions is legislatively mandated or administratively created.

2. **[Critical]** Whether the start-date justification requirement in §17 vedtak has a statutory anchor in Forvaltningsloven or Sosialtjenesteloven or derives from the

normative circular layer.

3. **[Important]** Whether the EØS residence assessment obligations in Set A reflect requirements that can be substantively discharged through access to a regional or national specialist, or whether they require locally sustained competence. The veileder source of this requirement means that its operational interpretation may be malleable.

4. **[Important]** Whether Set A's classification of the individual needs-based calculation requirement (§18) as scale-neutral should be revisited in light of Set B evidence that municipalities default to standard rates precisely when case volume is too low to sustain discretionary assessment practice. The formal classification may be correct (the legal obligation is scale-neutral) while the empirical compliance pattern is volume-sensitive.

5. **[Moderate]** Whether the internkontroll obligations that form Cluster 2 are fulfilled by any reasonable standard of continuous oversight, including informal peer review and direct management involvement in cases, or whether the specific *methods* required (formal software, ROS analyses, portfolio reviews) have a regulatory basis that would need to be formally revised to permit smaller-scale functional equivalents.

ANALYTICAL MEMO

Volume Drivers in Norwegian Social Services: Synthesis of Normative Requirements and Supervision Findings

Classification: Internal research memorandum
Purpose: Synthesis for Track B analysis — identifying volume-sensitive requirements
Data sources: Set A (structured paragraph analyses, §§ 17–19); Set B (empirical findings from 100+ supervision reports, 2023–2025)
Caveat: All assessments of legal source (law vs. sub-legal instrument) are descriptive flags only. Determination of whether a driver could be eliminated through normative simplification or legislative change is explicitly reserved for the manual verification phase.

PRELIMINARY NOTE ON SCOPE ASYMMETRY

Set A as provided covers only **§ 19** (Stønad i særlige tilfeller), where both requirements are classified **scale-neutral**. Set B, by contrast, contains findings spanning multiple service domains and numerous statutory provisions — primarily §§ 17, 18, and the activity duty under § 20a, as well as internal control obligations under § 5. This creates a structural asymmetry: the normative mapping in Section 1 below can only be performed in full for § 19. For all other provisions heavily represented in Set B — especially § 17 — the memo proceeds directly from empirical evidence, with the normative classification of those requirements flagged as **pending Set A completion**. This is not a deficiency in the analysis; it is the correct response to the data available.

SECTION 1: MAPPING NORMATIVE REQUIREMENTS TO EMPIRICAL EVIDENCE

1a. Requirements appearing in Set A WITH corresponding Set B evidence

§ 19 — Requirement 1: Plikt til å vurdere stønad i særlige tilfeller
Set A classification: Scale-neutral. Mechanism: None triggered.

Set B contains **one directly relevant finding** (Alstahaug / Nav Ytre Helgeland, 2023) tagged as [S] SPECIALIZATION, where caseworkers systematically relied on standardized rejection texts under § 19 and lacked the capacity to perform individualized discretionary reasoning. The supervisor explicitly stated: *"En reell vurdering og skjønnsutøvelse etter § 19*

krever at det kommer fram hva som er vektlagt og hvordan dette er vektlagt. Dette mangler i avslagene."

Analytical tension: This constitutes a mild conflict between Set A and Set B. Set A classifies the § 19 discretionary assessment as scale-neutral on the grounds that it requires only basic social work competence. Set B shows that small offices with fully generalized workforces covering multiple municipalities may lack sufficient encounter frequency with complex § 19 cases to maintain the individualized reasoning expected. The driver here is [K] (competence sustainability) as much as [S], arising from too-low volume of legally complex edge cases to practise independent legal reasoning.

Uncertainty flag: The Alstahaug finding may reflect an acute capacity problem (refugee influx concurrent with understaffing) rather than a pure scale effect. The evidence is thin — one finding — and Set A's classification as scale-neutral may be correct for most offices. This should be reviewed in the verification phase.

§ 19 — Requirement 2: Vurdering av unntak fra det subsidiære prinsippet
Set A classification: Scale-neutral. Mechanism: None triggered.

No Set B finding directly addresses this requirement. **No conflict identified.**

1b. Requirements appearing in Set A but with NO corresponding Set B evidence

Both § 19 requirements classified as scale-neutral have no Set B confirmation of scale-driven failure. They are therefore **not flagged as latent volume drivers** at this stage, with the caveat on Requirement 1 noted above.

Critical gap: Set A does not yet cover §§ 17, 18, 20a, or § 5 (internkontroll). These paragraphs generate the overwhelming majority of Set B findings. Until Set A analyses for those provisions are available, the normative half of the mapping exercise is structurally incomplete. The remainder of this memo treats Set B findings as the primary analytical substrate and characterizes their implied normative drivers descriptively.

SECTION 2: DOMINANT MECHANISMS

Mechanism frequency across all Set B findings

The following count is based on all findings in Set B where a mechanism tag is explicitly assigned. Where a single report yields multiple findings with the same tag, each is counted separately.

Mechanism	Approximate count	Share

[D] Documentation Apparatus	~65 findings	~42%
[P] Procedural Continuity	~28 findings	~18%
[C] Coordination Infrastructure	~26 findings	~17%
[S] Specialization	~16 findings	~10%
[K] Competence Sustainability	~14 findings	~9%
[T] Threshold-Dependent Quality	~2 findings	~1%

Note: Counts are approximations based on explicit tagging in Set B. Some entries carry dual-mechanism implications; only the primary tagged mechanism is counted here.

[D] DOCUMENTATION APPARATUS dominates overwhelmingly. It appears in virtually every municipality in the sample regardless of service domain, population size, or organizational model. This is the single most consistent finding in the entire dataset.

[P] PROCEDURAL CONTINUITY and [C] COORDINATION INFRASTRUCTURE are closely matched and together account for more than one-third of all findings. Their co-occurrence with [D] is frequent (see Section 3 below on cumulative clusters).

[T] THRESHOLD-DEPENDENT QUALITY is the rarest mechanism — explicitly identified only in Nesna (survey data insufficiently anonymized at small-office level) and implicitly present in several [K] cases. It is almost certainly under-identified in supervision reports, since supervisors typically do not frame failures in terms of statistical validity thresholds. This mechanism is a **latent driver** whose full extent is likely obscured by supervisory framing.

Dominant service domains

Aggregating Set B by domain:

Domain	Finding density	Dominant mechanisms
Debt counseling / §17 economic advice	Very high — present in virtually all reports	D, P, C, S, K
Financial assistance with child perspective	High — present in ~60% of reports	D, S, K, C
Internal control / quality management	High — crosscutting all reports	D, C, P
Activity duty (§20a)	Moderate — Vestby, Ringerike	P, K, D
Complaint handling	Low — Nav Våler	P, S

Housing / KVP	Not represented in Set B as provided	—

Debt counseling under § 17 is the single most volume-sensitive service domain in the dataset. It concentrates all six mechanisms and generates the largest number of sanctions across the largest number of municipalities. The explanation is structural: § 17 covers a broad spectrum from simple budget guidance (level 1) through specialized debt settlement (level 3), requiring simultaneously a formal administrative pipeline for every interaction and deep specialist knowledge for the highest-complexity cases — a combination that small offices cannot sustain.

SECTION 3: CUMULATIVE VOLUME DRIVERS

Individual requirements, even when manageable in isolation, combine into clusters that collectively exceed the functional capacity of small generalist offices. Four such clusters are identified below.

Cluster 1: The § 17 Documentation and Formalization Stack

Mechanisms: [D] + [P]

The most pervasive cluster. It operates as follows:

Under § 17 as interpreted in Rundskriv 35 and supervisory practice, every instance of financial advice — including low-threshold guidance like budget help — must generate:

- A formal written administrative decision (enkeltvedtak) before or when the service starts, including an explicit, reasoned start deadline
- Separate, continuous journal notes documenting all advice, follow-up, and the content of conversations
- Archived records of all modes of contact, including SMS and informal communication

Each of these requirements is individually modest. Together, they impose a triple documentation burden — formal decision + journal + contact archive — on every single advisory interaction, regardless of complexity. For small offices processing 5–22 § 17 cases annually (Skaun, Tinn, Verdal, Sogndal, Årdal), the pipeline is triggered so rarely that no repeatable routine forms, yet when it is triggered, the full compliance burden falls immediately on generalist frontline workers with no back-office support.

Empirical confirmation (selected): Midtre Gauldal (1 case/month, cannot sustain "fixed practice"), Skaun (5,000 general cases vs. ~15 § 17 cases, pipeline erodes), Verdal (5–8 formal cases/year, procedure not internalized), Årdal (immediate help provided, formal pipeline bypassed entirely because no queue exists), Sogndal (8 decisions in prior year), Salangen, Målselv, Høyanger, Tinn, Nordreisa, Indre Fosen, and many others.

Why the combination is worse than its parts: A requirement to write formal decisions alone might be manageable if staff could rely on standardized templates. A journaling requirement alone might be manageable if routines were embedded. But the combination demands that generalist caseworkers simultaneously master: (a) the legal trigger threshold for when informal guidance becomes a statutory service requiring a decision; (b) the specific formal elements required in the decision (start date, legal basis, urgency reasoning); and (c) the discipline of logging all ongoing advisory dialogue. The result is that even offices providing high-quality substantive help are penalized for failing on all three administrative sub-tasks simultaneously.

Legal source flag: The formal decision requirement is anchored in sosialtjenesteloven § 17 and forvaltningsloven. However, the specific requirement for start deadlines in decision letters, and the scope of journaling obligations (including SMS), derives primarily from **Rundskriv 35 and supervisory interpretive practice** rather than directly from the statute. This distinction is analytically significant for Track A and is flagged for verification.

Cluster 2: The Specialization and Competence Bottleneck

Mechanisms: [S] + [K]

Debt counseling at levels 2 and 3 (complex negotiation, gjeldsordning proceedings) requires specialist expertise that can only be maintained through regular, active caseload. Small municipalities — typically those below 10,000–15,000 inhabitants — generate too few level-3 cases to sustain full-time specialist competence internally. The result is a structural single-point-of-failure: one specialist, whose absence halts the entire service (Løten, Nav Vefsna, Sveio, Nes, Hole), or — more commonly — no dedicated specialist at all, with generalists attempting level-3 work they encounter too rarely to perform confidently.

The competence bottleneck compounds the formalization cluster: even if a caseworker is motivated to write formal decisions, they may not know the correct legal threshold for triggering one, or the specific statutory elements required. Verdal, Sogndal, Målselv, Nes, and Nav Àvjovàrri all show caseworkers who knew the service existed but were uncertain about when and how to formalize it — a direct consequence of processing fewer than ten such cases per year.

Why the combination is worse than its parts: Specialization failure (no dedicated expert) and competence degradation (too-rare encounters to maintain skill) are distinct problems that reinforce each other: the absence of a specialist means no one develops expertise through practice, and the low caseload means no one develops expertise through volume. The municipality is caught in a reinforcing loop that cannot be broken by training alone, because without a critical mass of cases, skills acquired through training erode rapidly.

Specific risk: gjeldsordning competence. Løten's current debt counselor, appointed September 2024, had processed zero gjeldsordning cases at the time of inspection. This is not negligence — it reflects the statistical reality that a municipality of ~8,000 residents generates formal debt settlement cases too infrequently to give a new specialist early

experience. The requirement to maintain competence in a procedure that may arise once every two or three years cannot be met by a single officer in a small office.

Legal source flag: The competence requirements derive from sosialtjenesteloven § 17 and the interpretive framework in **Rundskriv 35 (especially the level 1/2/3 tiering model)** and the **Veileder om økonomisk stønad**. The level-tiering structure itself — which creates the expectation of differentiated specialist capacity — originates from sub-legal instruments, not from the statute directly. This is a Track A candidate for review.

Cluster 3: The Internal Control Infrastructure Stack

Mechanisms: [C] + [D]

The internkontroll requirements, as operationalized through supervisory practice, demand:

- Formal risk and vulnerability analyses (ROS-analyser) for each service area
- Scheduled random spot-checks (stikkprøvekontroller) of case portfolios
- Portfolio reviews at regular intervals
- Formal deviation registration in designated software (Compilo, Risk Manager, ASYS, QM+)
- Separate approval authority (vedtaksmyndighet) distinct from the caseworker

Each element presupposes an organization with sufficient internal differentiation to separate roles: a caseworker, an approver, a quality controller, and a manager performing audits. In offices of 3–12 municipal social services staff, this differentiation is structurally impossible. The predictable result, confirmed across dozens of reports, is: caseworkers self-approving decisions (Hole, Nordreisa, Nav Numedal), managers unable to conduct spot-checks because they are simultaneously the frontline worker (Hjelmeland, Båtsfjord, Vik), and deviation systems either unknown, inaccessible, or felt to be redundant because informal verbal communication already achieves the same purpose.

The Compilo/ASYS problem deserves specific note. Multiple reports document municipalities where the deviation software is physically inaccessible to NAV caseworkers because it sits in the municipal IT environment to which they lack credentials (Averøy, Giske, Nord-Fron, Nav Àvjovàrri, Båtsfjord, Hallingdal). This is a coordination infrastructure failure with a technical dimension: the state–municipal split in NAV creates mismatched IT systems that small offices cannot resolve locally.

Why the combination is worse than its parts: Formal deviation reporting (D) without a functioning approval-and-oversight structure (C) produces paperwork that reaches no one capable of acting on it. Formal oversight structures (C) without documentation of what is being overseen (D) produce audits of invisible activity. The two requirements are co-dependent: they only function together, yet together they demand back-office capacity that small offices do not have.

Legal source flag: The internkontroll obligation derives from sosialtjenesteloven § 5 and the general forvaltningsloven requirements. However, the specific form that internal control must

take — formal ROS analyses, scheduled portfolio reviews, documented spot-checks, role-separated approval — is operationalized almost entirely through **Rundskriv, supervisory methodology documents, and interpretive practice**. The statute does not prescribe the specific instruments.

Cluster 4: The Inter-Agency Coordination Expectation

Mechanisms: [C] + [D]

Multiple reports sanction municipalities for failing to maintain **formal, written, systemic cooperation agreements** with other municipal services (child welfare, substance abuse, refugee services, psychiatric services). In practice, these offices do collaborate — caseworkers refer directly to colleagues across the corridor — but the supervisor treats ad-hoc, informal collaboration as non-compliant because it lacks written agreements and traceable documentation.

This cluster is qualitatively different from the others because it penalizes the natural adaptive behavior of small offices, where informal coordination *functions correctly* at the operational level (Sør-Varanger, Hammerfest, Giske, Averøy, Randaberg, Senja). The compliance failure is entirely formal: the municipality does what is required, but does not document that it does what is required in the way the supervisory standard expects.

Legal source flag: The requirement for systematic, written inter-agency cooperation is not explicitly stated in sosialtjenesteloven. It derives from interpretive expectations in supervisory methodology and the general principle of coordinated services. This is a strong Track A candidate.

SECTION 4: RANKING BY STRUCTURAL IMPACT

The following ranks the identified volume drivers by the strength of the pressure they exert toward **specialization** or **intermunicipal cooperation**, and notes the legal source of each driver.

Tier 1 — Maximum structural pressure (effectively require inter-municipal cooperation)

Driver 1: Level-3 debt counseling availability

- Mechanism: [S] + [K]
- Impact: A municipality below approximately 10,000–15,000 inhabitants cannot sustain a full-time level-3 debt specialist. If the specialist is absent, the service halts. If the position is vacant, complex cases queue. This is a structural necessity for inter-municipal cooperation — no amount of training resolves it.
- Pressure: Very strong → intermunicipal cooperation

- Source: § 17 sosialtjenesteloven; level-tiering from **Rundskriv 35** (sub-legal)
- Confirmed by: Løten, Nav Vefsna, Sveio, Hole, Nes, Nordreisa, Horten

Driver 2: Gjeldsordning competence maintenance

- Mechanism: [K]
- Impact: Formal debt settlement proceedings are rare even for specialists. A single specialist in a small municipality may go one to three years without a gjeldsordning case, making competence maintenance structurally impossible without inter-municipal caseload pooling.
- Pressure: Very strong → intermunicipal cooperation or centralized specialist function
- Source: § 17; competence expectations from **Rundskriv 35 and Veileder** (sub-legal)
- Confirmed by: Løten (specialist had zero gjeldsordning cases at time of inspection)

Tier 2 — Strong structural pressure (manageable within office, but requires deliberate mitigation)

Driver 3: The § 17 formalization pipeline (Cluster 1)

- Mechanism: [D] + [P]
- Impact: Requires a repeatable bureaucratic pipeline for a service triggered too rarely in small offices to build routine. Can theoretically be addressed through templates and checklists, but only if case volume is sufficient to sustain practice — which it structurally is not in municipalities processing fewer than ~20 § 17 cases annually.
- Pressure: Moderate → specialization within the office (designating one caseworker as the § 17 lead) or simplification of the sub-legal requirements
- Source: § 17 sosialtjenesteloven; formalization details primarily from **Rundskriv 35 and supervisory practice** (sub-legal)
- Confirmed by: ~35 reports across the dataset

Driver 4: Role-separated approval and quality control (Cluster 3)

- Mechanism: [C] + [D]
- Impact: Requires structural separation of caseworker and approver roles that is physically impossible in offices of 2–5 social services staff. Produces systemic self-approval violations regardless of individual effort.
- Pressure: Strong → minimum staffing thresholds, or formal acknowledgment in supervisory practice that small offices must use alternative quality-assurance mechanisms
- Source: forvaltningsloven + sosialtjenesteloven § 5; specific role-separation expectations from **supervisory methodology** (sub-legal)
- Confirmed by: Hole, Nordreisa, Nav Numedal, Hjelmeland, Båtsfjord, Salangen

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Tier 3 — Moderate structural pressure (produces compliance friction, manageable with adequate resources)

Driver 5: Systematic child-perspective documentation

- Mechanism: [D] + [S]
- Impact: Requires individualized, written documentation of children's needs in every financial assistance decision. In small offices where caseworkers personally know every family, the information exists but is not written down. This is a documentation compliance failure, not a substantive care failure, in the majority of cases reviewed.
- Pressure: Moderate → training and template adoption, but underlying driver is administrative burden on generalist staff
- Source: sosialtjenesteloven § 18 + barnekonvensjonen via tolkning; documentation specifics from **supervisory practice** (sub-legal)
- Confirmed by: ~25 reports

Driver 6: Formal written inter-agency agreements (Cluster 4)

- Mechanism: [C]
- Impact: Functionally, collaboration exists. The failure is purely formal: no written agreements. Rectifiable without structural change if normative expectations are adjusted.
- Pressure: Low → administrative fix, but reveals misalignment between supervisory expectations and scale-appropriate practice
- Source: No explicit statutory requirement for written agreements identified; derives from **supervisory interpretive practice** (sub-legal)
- Confirmed by: Sør-Varanger, Hammerfest, Giske, Averøy, Randaberg, Senja

Driver 7: Threshold-dependent quality — survey and statistical feedback

- Mechanism: [T]
- Impact: Explicit in Nesna (too small for local-level survey results to be reported); implicit in many other offices that lack performance data to drive improvement. Structurally irresolvable at small scale without aggregation at inter-municipal or county level.
- Pressure: Moderate → data aggregation at higher levels; unremedied at single-office level
- Source: General quality assurance expectations, not statutory
- Confirmed by: Nesna (explicit); likely latent in many others

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SECTION 5: CONNECTIONS TO TRACKS A AND C1

Track A (Hjemmelsinnsnevring — Legal Mandate Narrowing)

Several of the most significant volume drivers identified above are rooted not in the text of sosialtjenesteloven but in sub-legal normative instruments — primarily Rundskriv 35 and the

Veileder om økonomisk stønad — that specify how the law is to be applied. This has direct analytical significance for Track A: if a driver's operative requirements derive from a circular or interpretive document rather than the statute, it is potentially removable or adjustable through normative revision without legislative change.

High-priority Track A flags:

1. **The level 1/2/3 tiering model for § 17** — this classification schema, which creates differentiated specialist expectations at each tier, originates in Rundskriv 35, not the statute. The statute requires the service; the circular creates the complexity that makes the service volume-sensitive. If the tiering model imposes requirements that a plain reading of § 17 does not require, this is a strong Track A candidate.

2. **The start-deadline formalization requirement in § 17 decisions** — the requirement that formal decisions under § 17 must include an explicit, reasoned start deadline is confirmed across dozens of reports as the single most common trigger for sanctions (Midtre Gauldal, Indre Fosen, Skaun, Verdal, Sogndal, Årdal, and many others). Its precise legal foundation — whether § 17 itself, forvaltningsloven § 11a, or Rundskriv 35 — requires verification. If it derives primarily from sub-legal elaboration, it is a leading Track A candidate.

3. **The written inter-agency agreement requirement** — as noted above, no statutory provision appears to mandate written inter-agency agreements as opposed to functioning inter-agency collaboration. If the sanctioning practice rests on supervisory methodology rather than law, this is a Track A candidate.

4. **The § 19 discretionary reasoning standard** — Set A classifies the § 19 assessment as scale-neutral, but Set B shows at least one case (Alstahaug) where the supervisory standard for what individualized reasoning requires (explicit weighting of every factor) may exceed what the statute demands. The gap between statutory requirement and supervisory operationalization is a Track A question.

Track C1 (Sårbarhetssjekken — Vulnerability of Small Professional Environments)

The majority of Tier 1 and Tier 2 volume drivers identified in Section 4 directly map onto Track C1 vulnerability indicators. The following intersections are analytically most significant:

Intersection 1: Single-specialist dependency (Driver 1 + C1) Every report documenting a municipality that relies on one debt counselor — Løten, Nav Vefsna, Sveio, Hole, Nordreisa, Nes, and others — shows the same structural signature: when the specialist is absent, sick, or resigning, the entire service halts. This is the canonical Track C1 vulnerability pattern. The volume driver analysis adds a normative dimension: the vulnerability is not merely organizational but regulatory — the requirement for specialized level-2/3 capacity is the force that creates the bottleneck.

Intersection 2: Generalist model and competence degradation (Driver 2 + C1) The "everyone does everything" generalist model appears in reports for Senja, Nord-Fron, Sør-Varanger, Nav Àvjovàrri, Salangen, and others. Track C1 identifies this as a vulnerability indicator. The volume driver analysis identifies the mechanism: competence in complex sub-services (gjeldsordning, barnets beste assessments, § 19 discretionary reasoning) erodes when encounter frequency is below the threshold necessary to maintain practice-based skill. The solution to both Track C1 vulnerability and this volume driver is the same: specialization, which in turn requires inter-municipal caseload pooling.

Intersection 3: Management overstretch (Driver 4 + C1) Reports for Hjelmeland, Båtsfjord, Vik, Nav Numedal, and others document managers who are simultaneously the office's primary social services caseworker, its debt counselor, and its sole quality assurance mechanism. This is a Track C1 compound vulnerability. The volume driver analysis adds that the regulatory expectation of role-separated approval assumes an organizational differentiation that these offices structurally cannot provide — the problem is not management quality but structural impossibility.

Intersection 4: IT system fragmentation (Cluster 3 + C1) The Compilo/ASYS inaccessibility problem documented in Averøy, Giske, Båtsfjord, and others is both a Track C1 IT-infrastructure vulnerability and a [D] + [C] volume driver. It reflects the structural consequence of the state–municipal split in NAV: small offices do not have the internal IT governance capacity to resolve access mismatches between state and municipal systems. The Track C1 vulnerability is the inaccessibility itself; the volume driver is the supervisory standard that requires use of those systems regardless of accessibility.

SUMMARY TABLE

Volume driver	Mechanisms	Domain	Tier	Track A flag	Track C1 flag
Level-3 specialist dependency	S + K	Debt counseling	1	Rundskriv 35 tiering	Yes — single specialist
Gjeldsordning competence	K	Debt counseling	1	Rundskriv 35	Yes — encounter frequency
§ 17 formalization pipeline	D + P	§ 17 advice	2	Rundskriv 35 / supervisory practice	Partial
Role-separated approval	C + D	Internal control	2	Supervisory methodology	Yes — management overstretch

Child-perspective documentation	D + S	Financial assistance	3	Supervisory practice	Yes — generalist model
Inter-agency agreement formalization	C	Multiple	3	Supervisory practice only	Partial
Survey/statistical threshold	T	Quality management	3	General QA expectations	Yes — data aggregation
§ 19 discretionary reasoning	S + K	Financial assistance	Uncertain	Supervisory operationalization (Alstahaug only — thin)	Partial

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OUTSTANDING UNCERTAINTIES AND FLAGS FOR VERIFICATION PHASE

1. **Set A coverage gap.** The normative mapping is structurally incomplete until Set A analyses for §§ 17, 18, 20a, and § 5 are available. Several of the highest-impact volume drivers identified empirically in Set B lack a corresponding normative classification.

2. **§ 19 / Alstahaug tension.** The conflict between Set A's scale-neutral classification of § 19 and the Alstahaug finding is real but rests on a single empirical data point in a report flagged as having concurrent acute capacity stress (refugee influx). Verification of whether the § 19 discretionary standard is genuinely scale-neutral or latently volume-sensitive requires additional Set A analysis and case review.

3. **Mechanism [T] under-identification.** Threshold-dependent quality failures are almost certainly more prevalent than the two explicit Set B findings suggest. Supervisors do not typically frame failures in terms of statistical validity thresholds. This mechanism warrants targeted review in the verification phase, particularly in relation to internal control data systems and survey feedback mechanisms.

4. **The "no sanction / good practice" paradox.** Several reports (Årdal, Hjelmeland, Karlsøy, Nav Numedal, Kvam herad, Nord-Fron) document offices rated as effectively delivering high-quality services to satisfied users while simultaneously failing bureaucratic compliance standards. This pattern is analytically significant: it suggests the documentation and procedural requirements identified as volume drivers are generating compliance costs without corresponding service quality improvements in small-scale settings. This should be reflected in any assessment of proportionality.

5. **Legal source of start-deadline requirement in § 17 decisions.** This requirement is the single most frequently sanctioned element across the entire dataset. Its precise legal anchor requires verification before Track A conclusions can be drawn.

Memo prepared for internal analytical use. All citations to specific supervision reports retain original Norwegian terminology. All assessments of legal source are descriptive flags only; legal determination is reserved for the manual verification phase.

ANALYTICAL MEMO

Volume Drivers in Norwegian Social Services: Synthesis of Normative Requirements and Supervision Evidence

Classification: Internal research memo — Track B synthesis **Source sets:** Set A (§ 20a normative analysis, Document 1); Set B (supervision report findings, Document 2) **Purpose:** Identify empirically confirmed and latent volume drivers; map mechanisms; flag intersections with Tracks A and C1

PART 1: MAPPING NORMATIVE REQUIREMENTS TO EMPIRICAL EVIDENCE

1a. Requirements Confirmed by Both Set A and Set B

Requirement 1 — Diverse portfolio of activity measures (§ 20a)

- **Set A classification:** Volume-sensitive, Mechanism T (Threshold-Dependent Quality)
- **Set A justification:** Running structured group activities, low-threshold programmes, and work-training measures requires a critical mass of participants; for 1–2 youths per year, the "activity" degrades to ad hoc, isolated tasks.
- **Set B confirmation:** Nav Vestby (2025) provides direct empirical corroboration. The municipality previously operated its own local activity programme and reported it was then straightforward to set conditions early. Once the municipal programme closed, the office became dependent on state-level measures with long waitlists, structurally preventing timely condition-setting under § 20a. The quote is explicit: *"Det oppgis i intervjuer at kommunen tidligere hadde et kommunalt tiltak. Det var da enklere å stille vilkår... I flere intervjuer vises det til utfordringer med ventetider på statlige tiltak."*
- **Supporting Set B count:** 1 direct finding (Nav Vestby); the Nesna finding on survey thresholds provides structural reinforcement of the T mechanism in a related quality-management domain, though not § 20a specifically.
- **Assessment:** Confirmed. The T mechanism is rare in Set B overall, which makes this match analytically significant — it means the only T-classified requirement in Set A has already manifested in supervision practice exactly as the mechanism predicts.

1b. Requirements in Set A with No Corresponding Set B Evidence — Latent Volume Drivers

Requirement 2 — Assess language skills using established frameworks (§ 20a)

- **Set A classification:** Volume-sensitive, Mechanism K (Competence Sustainability)
- **Set A justification:** Formally mapping a young person's language proficiency against established assessment frameworks requires specialist skill that will decay in a generalist office that rarely handles such cases.
- **Set B status:** No supervision finding in the provided corpus directly addresses language assessment competence under § 20a. This domain is absent from all 40+ reports reviewed.
- **Flag: Latent volume driver.** The K mechanism is extensively confirmed in Set B in adjacent domains (debt counseling, child welfare assessment, § 17 decision-making), which lends strong structural plausibility to this risk. The absence of Set B evidence most likely reflects the novelty of the strengthened language-training obligation rather than the absence of the problem. Supervision focus on § 20a language assessment has not yet accumulated in the corpus.

Requirement 3 — Retrieve and verify data from the National Introduction Register (NIR) (§ 20a)

- **Set A classification:** Volume-sensitive, Mechanism D (Documentation Apparatus)
- **Set A justification:** Maintaining active user access, technical connections, and routine familiarity with a specialized external national database imposes overhead that assumes back-office support or steady throughput.
- **Set B status:** No supervision finding addresses NIR-access or NIR-verification failures. The database-access problem is structurally analogous to findings about Compilo, ASYS, QM+, and Socio fragmentation documented in multiple Set B municipalities — but NIR specifically is unconfirmed.
- **Flag: Latent volume driver.** The D mechanism for external database compliance is one of the best-confirmed mechanisms in Set B generally (see Part 2), making this an analytically probable risk. Absence of evidence in the current corpus should not be read as absence of the problem. Source: *Sosialtjenesteloven* § 20a; *Forskrift om bruk av vilkår* § 1; Rundskriv 35 pkt. 4.20a.2.1.

PART 2: DOMINANT MECHANISMS

Mechanism Frequency Count

The following counts draw on all tagged findings across both Set A and Set B. Set B findings were counted per distinct municipality-finding pair to avoid double-counting the same underlying problem.

Mechanism	Set A count	Set B count (approx.)	Combined rank

[D] Documentation Apparatus	1	60+	**1st — dominant**
[P] Procedural Continuity	0	25+	**2nd**
[C] Coordination Infrastructure	0	20+	**3rd**
[S] Specialization	0	14+	**4th**
[K] Competence Sustainability	1	10+	**5th**
[T] Threshold-Dependent Quality	1	2	**6th — sparse**

Dominant mechanism: [D] — Documentation Apparatus. This is the single most pervasive volume driver in the empirical record by a wide margin. It appears in every domain covered by the supervision corpus, in every size category of municipality, and in both sanctioned and unsanctioned inspections. The core pattern is consistent: frontline generalists in small offices deliver competent practical help but fail to translate that help into the formal administrative artefacts — *vedtak*, journal notes, deviation registrations, ROS analyses — demanded by supervisory standards. Municipalities explicitly and repeatedly acknowledge that their workers know more about the user than the written record reflects.

Representative quotes establishing this as a structural rather than behavioral pattern:

- *"Derimot ble det oppgitt at veilederne visste mer om brukernes situasjon enn det som kom fram av journalene."* — Skaun, Nordreisa, Nannestad, Salangen, Målselv, and others, near-verbatim.
- *"Dei oppfyller ikkje dei formelle krava til å fatte vedtak, men oppfyller plikta til å gi rådgiving."* — Hustadvika 2024 (the clearest single encapsulation of the D-mechanism dynamic in the corpus).

Second mechanism: [P] — Procedural Continuity. Failures cluster around two distinct sub-types: (i) the inability to maintain a repeatable pipeline for formalizing oral applications into statutory requests, documented in Skaun, Høyanger, Verdal, and Sogndal; and (ii) the inability to issue formal *vedtak* with legally required startup deadlines before or simultaneously with service delivery, documented in Midtre Gauldal, Nordreisa, Tinn, Nannestad, Nav Numedal, Salangen, Årdal, and others. Both sub-types arise from the same volume cause: a pipeline cannot become habitual when triggered fewer than 10–15 times per year.

Third mechanism: [C] — Coordination Infrastructure. Two sub-types dominate: (i) the absence of a formal maker/checker separation for *vedtak* approval, where one person approves their own decisions (Nordreisa, Hole, Hjelmeland, Nav Numedal, Båtsfjord); and (ii) the absence of systematic, written cooperation agreements with other municipal services or between generalists and specialists (Sør-Varanger, Hammerfest, Senja, Nannestad, Løten, Salangen). Both are structurally predicted by small organizational scale.

Highest-Concentration Service Domains

Debt counseling (økonomisk rådgivning / gjeldsrådgivning) accounts for the largest concentration of volume-sensitive findings by far — present in approximately 35 of the 40+ reports reviewed. Every mechanism fires in this domain. This is not coincidental: debt counseling has a uniquely multi-layered compliance architecture (levels 1–3, § 17 *vedtak* requirements, NIR, ROS analyses, maker/checker approval, specialist-generalist handover protocols) that individually and cumulatively overwhelms small offices.

Financial assistance with child perspective (barneperspektiv) is the second most heavily affected domain, with [D] and [K] dominating. The requirement to individually map and formally document children's needs is consistently undermined in small offices where caseworkers know families personally but lack time or back-office capacity to translate that knowledge into written records.

Activity duty for youth under 30 (§ 20a) is a tertiary domain in Set B, with Nav Vestby and Ringerike providing the clearest evidence. The relative scarcity of § 20a findings may reflect the recency of strengthened statutory obligations rather than an absence of structural problems. The Set A analysis flags three volume-sensitive requirements in this domain (T, K, D), none of which have yet accumulated a deep supervision record.

PART 3: CUMULATIVE VOLUME DRIVERS

Cluster 1 — The Debt Counseling Compliance Stack

The most analytically significant cumulative driver is the combination of requirements in the debt counseling domain. Individually, each requirement is manageable; collectively, they constitute a compliance architecture that presupposes a mid-to-large bureaucratic organization.

The cluster consists of five simultaneously operative requirements:

1. **Formal *vedtak* for every level of advice including level 1** (P/D): Each counseling interaction, however brief or informal, must trigger a separate legal decision with a formally justified startup date. Sources: *Sosialtjenesteloven* § 17; Rundskriv 35.

2. **Maker/checker separation for all *vedtak* approval** (C): Every decision must be approved by a person distinct from the drafter. Sources: *Sosialtjenesteloven* general administrative requirements; confirmed in Nordreisa, Hole, Hjelmeland, Løten.

3. **Dedicated specialist maintaining live competence at level 3** (S/K): Complex debt cases require formal expertise — gjeldsordning, statutory debt settlement — that can only be sustained through regular practice. Sources: Rundskriv 35; confirmed in Løten, Nav Vefsna, Nes, Sveio, Båtsfjord.

4. **Formalized handover protocol between generalist and specialist tiers** (C): Clear written rules defining when a case must be transferred upward are required. Sources: Rundskriv 35; confirmed in Løten, Nannestad, Salangen.

5. **Systematic journal documentation of all follow-up, including SMS and phone contact** (D): All interactions must be logged in the central system regardless of channel. Sources: Rundskriv 35; confirmed in Hustadvika, Sunndal, Høyanger, Sogndal, Salangen, Målselv.

Why the combination is more problematic than each element in isolation: A municipality with, say, 8–12 formal debt counseling decisions per year might theoretically sustain any one of these requirements through periodic training or a general administrative routine. But the stack demands simultaneously: (a) a dedicated specialist for level 3 (justifying the position requires sustained caseload that small municipalities lack); (b) a second person available to approve decisions (impossible if the specialist is the only debt-competent employee); (c) a formalized two-tier handover pipeline (operationally irrelevant if one person handles everything); (d) documented *vedtak* for every minor interaction (impossible to maintain as a habit on 8–12 annual triggers); and (e) continuous real-time journaling including SMS (requires back-office capacity that does not exist). Each requirement assumes the others are already satisfied. The result is a structural impossibility for any office below a threshold caseload, estimated by the empirical record at roughly 30–50 formal cases per year.

Empirical confirmation: This cluster is the single most frequently sanctioned set of failures in the corpus, appearing in materially identical form across Tinn, Nordreisa, Skaun, Hustadvika, Hole, Løten, Nannestad, Nav Numedal, Sogndal, Sveio, Høyanger, Årdal, Salangen, Målselv, Verdal, Båtsfjord, and Karlsøy — municipalities ranging from 2,600 to 28,000 inhabitants and from 5 to 28 employees. The geographic and organizational breadth rules out local management failure as a primary cause.

Cluster 2 — The Internal Control Apparatus

A second cumulative cluster operates across all social service domains, not just debt counseling. It combines:

1. **Formal deviation registration in dedicated software** (D): Requires use of Compilo, ASYS, QM+, or Riskmanager for all professional errors. Confirmed failures in Nesna, Giske, Averøy, Sør-Varanger, Àvjovàrri, Båtsfjord, Hammerfest, Nav Hallingdal, Senja, and others.

2. **Periodic systematic spot-checks (stikkprøvekontroller) of case files** (C/D): Management must conduct regular sampling audits. Confirmed failures in Løten, Tinn, Våler (2025), Sør-Varanger, Hjelmeland, Averøy, Randaberg, and others.

3. **Formal ROS (risk and vulnerability) analysis per service area** (D/C): A documented risk analysis must exist for each defined service. Confirmed failures in Hjelmeland, Sør-Varanger, Våler (2025), Nesna, Årdal, Målselv.

4. **Portfolio-level statistical overviews and reporting upward to management** (C): Management must have aggregated data on caseloads. Confirmed failures in Løten, Nav Numedal, Randaberg.

Why the combination is more problematic than each element in isolation: The internal control apparatus is designed for organizations where management is structurally separated from frontline production and must use formal instruments to maintain oversight. In offices of 5–12 employees where the NAV leader reads every decision, sits in on team meetings, personally knows all users, and often carries a frontline caseload themselves, the formal control regime is simultaneously redundant (because the leader has direct oversight) and disproportionately burdensome (because maintaining it requires dedicated administrative time that does not exist). Small offices solve quality assurance organically through proximity; the supervisory regime treats the absence of the formal bureaucratic overlay as a legal violation. Nesna 2024 captures this precisely: *"Det er for lite til at resultater fra bruker- og ansattundersøkelser blir formidlet til lokalt nivå."*

Flag — uncertainty: It is less clear than in Cluster 1 whether these failures originate primarily in law or in sub-legal normative instruments. Several internal control requirements derive from *kommuneloven* § 25-1 and *sosialtjenesteloven* § 5 rather than from rundskriv alone. This requires legal verification before any simplification argument can be made (see Part 4).

Cluster 3 — Child Perspective Documentation

A third, focused cumulative cluster operates in financial assistance for families:

1. **Holistic mapping of each child's specific needs** (K/S): Caseworkers must individually assess health, housing, social network, and daily life for every child in the household.

2. **Formal written documentation of that mapping** (D): The assessment must appear in journal notes or the decision, not merely be held as tacit knowledge.

3. **Formal *vedtak* under § 17 for any guidance provided to families** (P): Advisory conversations must be converted into legal decisions with appeal rights.

4. **Assessment of barnets beste when setting activity conditions for young parents** (K): Confirmed in Ringerike 2025 — caseworkers encounter this demographic so rarely that the trigger fails to activate.

Cumulative effect: The combination forces a generalist caseworker handling 200–400 total social assistance cases annually to maintain specialized competence in child welfare law, exercise that competence reliably in the subset of cases involving families (which may be 15–30% of the total), document it exhaustively in every instance, and separately issue formal § 17 decisions whenever they provide any guidance. In offices relying on caseload distribution by birth date (Senja, Sør-Varanger, Nord-Fron, Nav Hallingdal), no individual caseworker encounters family cases frequently enough to make any of these a habitual pipeline. The result is consistently identified failures: generalists verbally conducting the assessments while failing to document them, and omitting § 17 *vedtak* because the service is folded into general contact.

PART 4: RANK BY STRUCTURAL IMPACT

Tier 1 — Highest Structural Impact (push toward specialization or intermunicipal cooperation is near-mandatory)

[S] Specialization — Level 3 debt counseling specialist

- **Structural impact:** Maximum. A municipality that cannot sustain caseload sufficient to justify a dedicated level-3 specialist will face either a structural bottleneck (Løten, Nav Vefsna, Sveio) or total service unavailability during absences (Nes, Båtsfjord). No generalist model can substitute for this role at level 3. This driver alone forces intermunicipal cooperation or outsourcing to competence centers.
- **Legal source:** *Sosialtjenesteloven* § 17. The three-tier service level framework is elaborated in sub-legal normative instruments (Rundskriv 35 and associated guidance). *Flag for legal verification: whether the statutory text independently requires level-3 specialist capacity, or whether this requirement is fully a product of the circular's interpretation of the statutory duty.*

[S/K] Specialization + Competence Sustainability — Combined child welfare and legal discretion competence

- **Structural impact:** High. The combination of mandatory individual child assessment under *sosialtjenesteloven* § 18 and mandatory discretionary § 19 analysis requires legal-welfare expertise that degrades rapidly in generalist offices. Alstahaug 2023 and Nord-Fron 2023 both document the use of standardized rejection text as a symptom of eroded § 19 competence.
- **Legal source:** *Sosialtjenesteloven* §§ 18–19 for the substantive obligations; documentation and assessment standards primarily in Rundskriv 35 and *Prop. 91 L (2010–2011)*. *Flag for legal verification: the degree to which individualized § 19 assessment is a direct statutory requirement versus a supervisory interpretation elaborated in the circular.*

Tier 2 — High Structural Impact (push toward cooperation is strong but not absolute)

[D] Documentation Apparatus — vedtak for all levels of § 17 advice

- **Structural impact:** High. The requirement to issue formal decisions for level 1 (simple budget guidance) is the most frequently sanctioned individual requirement in the corpus. It structurally disadvantages small offices that deliver the same guidance informally and immediately.
- **Legal source:** *Sosialtjenesteloven* § 17 for the underlying service obligation; the requirement that § 17 services trigger *enkeltvedtak* is grounded in *forvaltningsloven* §§ 2 and 23 and elaborated in Rundskriv 35. *Flag for legal verification: whether every instance of § 17 guidance legally requires an enkeltvedtak, or whether the circular imposes a stricter documentation standard than the statute mandates. This is a high-priority question for Track A (hjemmelsinnsnevring): if the circular's vedtak-for-all-levels requirement is not strictly compelled by law, simplification is within scope.*

[C] Coordination Infrastructure — maker/checker separation

- **Structural impact:** High. The requirement structurally presupposes at least two employees with overlapping *vedtaksmyndighet*, which is impossible in the single-specialist or two-caseworker configurations documented in Nordreisa, Hole, and Hjelmeland.
- **Legal source:** *Forvaltningsloven* § 6 (on impartiality) and general *kommuneloven* internal control requirements. The specific operationalization as maker/checker in the context of § 17 is a supervisory practice standard. *Flag for legal verification: whether forvaltningsloven independently mandates structural separation or whether this is a supervisory expectation layered on top.*

Tier 3 — Moderate Structural Impact (manageable through targeted measures)

[P] Procedural Continuity — formalizing oral applications

- **Structural impact:** Moderate. The requirement that oral inquiries be recognized and registered as formal applications is individually manageable but fails systematically when caseload is below 10 per year. It pushes toward shared administrative intake functions rather than full intermunicipal cooperation.
- **Legal source:** *Forvaltningsloven* § 11a (duty to process applications); Rundskriv 35 for specific operationalization. *Flag: whether the circular imposes stricter oral-application formalization than forvaltningsloven requires is relevant to Track A.*

[K] Competence Sustainability — legal boundary between levels of advice

- **Structural impact:** Moderate. Verdal and Målselv both show that caseworkers cannot maintain the specific legal competence to distinguish § 11 (forvaltningsloven guidance) from § 17 (social services advice) when they trigger fewer than 10 formal decisions per year. Targeted training can partially mitigate, but decay recurs without sustained volume.
- **Legal source:** The distinction between levels is elaborated in Rundskriv 35 rather than explicitly in statute. *Flag for legal verification: whether the level taxonomy is a statutory or sub-legal construction.*

Tier 4 — Lower Structural Impact (latent, not yet empirically confirmed in this domain)

[T] Threshold-Dependent Quality — activity portfolio (§ 20a)

- **Structural impact:** Structural in its nature but relatively narrow in scope. Confirmed in Nav Vestby. Push is toward municipal programme investment or regional cooperation in activity provision. Does not by itself require intermunicipal administrative integration.
- **Legal source:** *Sosialtjenesteloven* § 20a (statutory obligation to set conditions); Rundskriv 35 pkt. 4.20a.1 and 4.20a.2.1; Kommunebrev 2025. *Flag: the obligation to maintain a diverse portfolio is articulated primarily in the circular (shall-language). Whether the statute independently mandates this breadth requires legal verification.*

[K] Competence Sustainability — language assessment (§ 20a)

- **Structural impact:** Likely moderate; empirically unconfirmed. Push would be toward shared language assessment resources in an intermunicipal setting.
- **Legal source:** Rundskriv 35 pkt. 4.20a.2.1 (bør-language). *Flag: advisory register (bør) reduces but does not eliminate volume-sensitivity.*

[D] Documentation Apparatus — NIR verification (§ 20a)

- **Structural impact:** Lower than Cluster 1 D requirements; database access is a solvable technical problem at relatively low cost, though routine familiarity requires volume.
- **Legal source:** *Sosialtjenesteloven* § 20a; *Forskrift om bruk av vilkår* § 1. *Flag: the NIR access requirement is rooted in statute and regulation, not solely in the circular.*

PART 5: CONNECTIONS TO TRACKS A AND C1

Intersections with Track A (Legal Mandate Narrowing — hjemmelsinnsnevring)

The concept of hjemmelsinnsnevring — the erosion of effective legal mandate through structural incapacity — is most directly implicated at the intersection of [S] and [K] mechanisms with the requirements for substantive legal discretion.

Critical intersection 1 — § 19 discretionary assessment. *Sosialtjenesteloven* § 19 grants municipalities a legally mandated discretionary power to grant assistance in exceptional circumstances. Alstahaug 2023 and Nav Skiptvet 2023 both document a structural incapacity to exercise this power: caseworkers use standardized rejection texts and cannot articulate how the § 19 criteria are weighed. This is not a misapplication of the law; it is an effective legal nullification of § 19 at the municipal level, driven by generalist overload. *This is a Tier 1 Track A intersection: the volume-sensitive failure in [S] directly narrows the effective hjemmel.*

Critical intersection 2 — § 20a barnets beste for young parents. Ringerike 2025 shows that even a relatively large municipality (31,000 inhabitants, dedicated youth department) fails to trigger the barnets beste assessment when the specific demographic is rare. The legal obligation under *barnekonvensjonen* Article 3 and *sosialtjenesteloven* § 20a exists; the volume-driven competence failure under [K] means it is not practically exercised. *This is a Track A intersection: a specific statutory duty is being rendered inoperative by frequency-of-encounter failure.*

Critical intersection 3 — § 17 vedtak requirement. The most contested Track A question in the debt counseling domain is whether *sosialtjenesteloven* § 17 independently requires *enkeltvedtak* for all levels of advice, or whether this requirement is imposed by Rundskriv 35's interpretation of the statute. Multiple State Administrators sanction municipalities for failing to issue *vedtak* for level 1 (simple budget guidance), while the substantive service is delivered correctly. If the *vedtak* requirement for level 1 is a circular construction rather than a direct statutory mandate, this would mean a sub-legal normative instrument is creating the primary volume driver for the [D] and [P] mechanisms — a direct hjemmelsinnsnevring scenario in reverse (the circular narrowing the practical operative space of the statute). *This requires priority legal verification.*

Intersections with Track C1 (Vulnerability of Small Professional Environments — sårbarhetssjekken)

Track C1 concerns are most directly confirmed at the intersection of [S] and [C] mechanisms with single-specialist configurations.

Critical intersection 1 — Single-specialist bottleneck. Løten, Nav Vefsna, Nes, Sveio, and Båtsfjord all document the same structural configuration: one debt specialist, no backup capacity, service continuity entirely dependent on that individual's presence. The Løten report states this explicitly as a supervisory finding (*"tjenesten er svært sårbart, ved gjeldsrådgivers fravær"*). This is the canonical Track C1 scenario: a small professional environment so thin that a single vacancy, illness, or maternity leave collapses a statutory service entirely. The [S] mechanism in Set B is consistently the mechanism that produces the most acute C1 vulnerability.

Critical intersection 2 — Competence decay and irreplaceability. Løten 2025 adds a dimension to Track C1 that goes beyond absence: the current debt counselor had not processed a single gjeldsordning case since September 2024, meaning even the present incumbent is building rather than maintaining competence. In this configuration, the office does not merely become vulnerable when the specialist leaves — it is structurally vulnerable in steady state because the caseload is insufficient to sustain live competence. This is a Track C1 finding with a [K] driver.

Critical intersection 3 — Shared or temporary managers. Hammerfest 2023 documents an extreme C1 configuration where the NAV leader is shared across two offices and lacks access to the municipal casework system. This is a direct structural consequence of small-municipality scale creating a need to pool leadership resources. The [C] mechanism (coordination infrastructure failure: the leader cannot access the system) and the [S] mechanism (no dedicated, locally embedded leadership) compound into a Track C1 vulnerability at the management tier rather than the frontline.

Critical intersection 4 — Internal control as C1 indicator. The consistent failure to maintain internal control regimes — stikkprøver, ROS analyses, portfolio reviews — across micro-offices (Løten, Tinn, Vestnes, Averøy, Àvjovàrri, Karlsøy) functions as a systemic C1 indicator. When management capacity is entirely absorbed by frontline service delivery, the quality assurance layer that would detect and correct failures is the first to be abandoned. This means C1 vulnerabilities tend to be self-concealing: the absence of the oversight apparatus is simultaneously a symptom of small-scale vulnerability and a mechanism by which other vulnerabilities go undetected.

SUMMARY TABLE

Rank	Driver	Mechanism(s)	Domain	Legal source	Track A intersection	Track C1 intersection	Set B strength
1	§ 17 *vedtak* for all levels of debt advice	D, P	Debt counseling	*Stl.* § 17 + Rundskriv 35	**HIGH** — circular may expand *vedtak* requirement beyond statute	Moderate	Very strong (35+ findings)

2	Level 3 specialist capacity	S	Debt counseling	*Stl.* § 17 + Rundskriv 35	Moderate	**HIGH** — single-specialist bottleneck	Strong (10+ findings)
3	Maker/checker *vedtak* approval	C	All social services	*Fvl.* + supervisory standard	Moderate	**HIGH** — structurally impossible in micro-offices	Strong (8+ findings)
4	§ 19 individualized discretionary assessment	S, K	Financial assistance	*Stl.* §§ 18–19	**HIGH** — effective mandate nullification	Moderate	Strong (6+ findings)
5	Internal control apparatus (Compilo/ROS/stikkprøver)	D, C	All social services	*Kommuneloven* § 25-1 + supervisory standards	Low	**HIGH** — self-concealing in small offices	Very strong (20+ findings)
6	Child mapping and barnets beste documentation	D, K	Financial assistance	*Stl.* §§ 18–19; *Barnekonv.* art. 3	**HIGH** (§ 20a young parents)	Moderate	Strong (15+ findings)
7	Activity portfolio (§ 20a)	T	Activity duty	*Stl.* § 20a + Rundskriv 35 + Kommunebrev 2025	Moderate	Moderate	Thin (1 confirmed finding)
8	Language assessment (§ 20a)	K	Activity duty	Rundskriv 35 (bør)	Low–Moderate	Moderate	**Unconfirmed — latent**

9	NIR verification (§ 20a)	D	Activity duty	*Stl.* § 20a + Forskrift + Rundskriv 35	Low	Low	**Unconfirmed — latent**

FLAGS FOR MANUAL LEGAL VERIFICATION

The following questions require legal judgment that this memo explicitly defers:

1. **Does *sosialtjenesteloven* § 17 independently mandate *enkeltvedtak* for level 1 financial advice, or is this a Rundskriv 35 construction?** This is the highest-priority verification question given the volume of Set B sanctions it generates.

2. **Does the three-tier service level taxonomy (levels 1–3) in debt counseling have a statutory basis, or is it entirely a product of sub-legal normative instruments?** If sub-legal, the specialist-capacity requirement may be within scope for simplification.

3. **Is the maker/checker *vedtaksgodkjenning* requirement directly mandated by *forvaltningsloven* § 6 and *kommuneloven*, or does it reflect a supervisory practice standard layered on top of those provisions?**

4. **Does the duty under § 20a to offer a diverse activity portfolio (Rundskriv 35 pkt. 4.20a.1 — skal) derive its mandatory force from the statute, or is the specific portfolio breadth requirement a circular elaboration that could be narrowed without statutory amendment?**

5. **Does *barnekonvensjonen* Article 3 and *sosialtjenesteloven* § 20a, read together, independently require individual barnets beste assessment in every case involving young parents, or is this operationalized through the circular?**