MECHANISM: **[D] DOCUMENTATION APPARATUS** DOMAIN: Economic counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The supervisor expected the municipality to issue formal, written administrative decisions (vedtak) for all forms of economic advice, including simpler interventions like basic budget guidance. WHAT WAS FOUND: The municipality provided simple budget guidance to users informally, without triggering the heavy process of writing a formal legal decision (vedtak) for it. WHY VOLUME IS THE REAL CAUSE: **The requirement imposes a heavy, formal documentation pipeline (vedtak) for everyday guidance, which small offices typically handle informally precisely because they lack dedicated administrative capacity to formalise every minor interaction.** QUOTE: "I lys av at Nav-kontoret har nokså få saker om økonomisk rådgivning, særlig målt mot antall saker om økonomisk sosialhjelp, vurderer vi at Nav-kontoret har et forbedringspotensial når det gjelder å skrive vedtak om enklere økonomisk rådgivning." MUNICIPALITY: Indre Fosen kommune YEAR: 2024

MECHANISM: **[C] COORDINATION INFRASTRUCTURE** DOMAIN: Economic counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The front-line caseworkers writing the decisions were expected to provide an exact deadline or appointment time for when the actual counselling sessions would start. WHAT WAS FOUND: The generalist caseworkers instead wrote that the specialist debt counsellor would contact the user within a certain timeframe (e.g., four weeks) to agree on a start date. This was the sole basis for the formal violation (lovbrudd) in the report. WHY VOLUME IS THE REAL CAUSE: **The municipality relies on a part-time (40%) specialist for debt counselling, meaning generalist front-line workers cannot seamlessly book appointments directly in the decision letter, requiring a two-step coordination process that violates rigid formal requirements.** QUOTE: "9 av de 15 § 17-vedtakene som vi har lest, inneholder en frist for når gjeldsrådgiveren tar kontakt, for å avtale et møtetidspunkt." MUNICIPALITY: Indre Fosen kommune YEAR: 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Moderate. The municipality was found to provide highly praised, timely, and well-documented counselling in actual practice, but was formally sanctioned solely for how it phrased deadlines in its decision letters. This scheduling "error" structurally stems from relying on a part-time (40%) specialist whose calendar cannot be directly booked by generalist front-line staff, revealing a rigid coordination standard designed for larger, more integrated offices. Furthermore, the explicit criticism that the office has "too few" formal cases of simple budget guidance shows how heavy documentation regimes penalise small offices that handle minor issues informally.

Here are the findings extracted from the supervision report that demonstrate mechanisms of scale-related failure.

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Financial advice (økonomisk rådgivning) WHAT WAS EXPECTED: The NAV office was expected to have an established, routine process for writing formal decisions (enkeltvedtak) that explicitly include a deadline for when the service will commence. WHAT WAS FOUND: The municipality was sanctioned because it lacks a "fixed and correct practice" for writing these decisions with start-up deadlines, which the supervisor attributes to an unclear or varied understanding of the rules among staff. WHY VOLUME IS THE REAL CAUSE: The supervisor demands a routine, repeatable procedural pipeline ("fixed practice") for an administrative task that the entire office only performed 8 times in 2023 and 18 times in 2024, making it too infrequent to sustain a standardized, automated workflow. QUOTE: "Midtre Gauldal kommune v/Nav Midtre Gauldal har ikke en fast og riktig praksis for å skrive vedtak som inneholder en reell frist for oppstart." MUNICIPALITY: Midtre Gauldal kommune YEAR: 2025

CLOSING FLAG

This report shows **moderate** evidence of a municipality being sanctioned for structural scale problems. The municipality was found to deliver well on practical user interaction—successfully identifying needs, informing users, and receiving both oral and written applications without turning people away. The sole legal violation is an administrative failure to formalize start deadlines in decision letters. Because the office averages roughly one financial advice case per month, the regulatory expectation of maintaining a "fixed and correct practice" demands a level of procedural continuity and routine that their exceptionally low caseload cannot naturally sustain.

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** debt counseling **WHAT WAS EXPECTED:** The Nav office was required to maintain a consistent practice of writing down and documenting all oral applications for financial counseling. **WHAT WAS FOUND:** The municipality lacks a fixed routine for recording oral requests, and employees provided conflicting accounts of how frequently these requests occur and how they are handled. **WHY VOLUME IS THE REAL CAUSE:** The office handles thousands of general social support cases but only a tiny fraction of specific financial counseling cases, meaning the procedural pipeline for formalizing these rare specific oral requests never gets practiced enough to become a routine. **QUOTE:** "Nav-kontoret har svært få saker om økonomisk rådgivning og gjeldsrådgivning, sammenlignet med antall saker om økonomisk sosialhjelp og nødhjelp. [...] Siden vi ikke har funnet brudd på de andre målepunktene, stiller vi spørsmål ved om Nav-kontoret fanger opp alle muntlige henvendelser som kan forstås som en søknad om tjenesten." **MUNICIPALITY:** Skaun kommune (Nav Skaun Melhus) **YEAR:** 2025

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** debt counseling **WHAT WAS EXPECTED:** The office must issue formal written decisions (vedtak) with clear start deadlines before commencing financial counseling services. **WHAT WAS FOUND:** Nearly half of the sampled cases lacked formal decisions entirely, and when decisions were written, they were often backdated or delayed until the user proved "motivated" to accept help. **WHY VOLUME IS THE REAL CAUSE:** Because the formal financial counseling caseload is so exceptionally low, caseworkers bypass the heavy administrative pipeline and simply provide practical help immediately alongside general social assistance, failing to trigger the distinct legal process required for this highly specific service. **QUOTE:** "Nav-kontoret har svært få saker om økonomisk rådgivning og gjeldsrådgivning, sammenlignet med antall saker om økonomisk sosialhjelp og nødhjelp. Nav-kontoret har heller ingen saker om kun økonomisk rådgivning. Dette kan skyldes ulike forhold. Én årsak kan være at Nav-kontoret ikke fatter vedtak om tjenesten, slik at økonomisk rådgivning og gjeldsrådgivning som gis, blir synlig i statistikken." **MUNICIPALITY:** Skaun kommune (Nav Skaun Melhus) **YEAR:** 2025

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** debt counseling **WHAT WAS EXPECTED:** Caseworkers must rigorously document all relevant information and practical advice that emerges during counseling sessions to ensure traceability and continuity. **WHAT WAS FOUND:** Caseworkers failed to journal the full extent of the practical help they actually provided, such as specific guidance given to users regarding daily consumption and spending. **WHY VOLUME IS THE REAL CAUSE:** The legal requirement imposes a heavy documentation regime for every minor piece of advice given, which becomes a disproportionate administrative burden for generalist frontline workers who are managing nearly 5,000 other emergency and social help cases simultaneously. **QUOTE:** "Rådsøkere vi har snakket med, har fortalt om hjelp som vi ikke finner beskrevet i saksdokumentene, blant annet veiledning om forbruk. Flere ansatte innrømmer et forbedringspotensial på å journalføre." **MUNICIPALITY:** Skaun kommune (Nav Skaun Melhus) **YEAR:** 2025

CLOSING FLAG

This report shows **strong evidence** of a municipality being sanctioned for structural scale problems rather than actual poor practice. The supervisor explicitly notes that users are highly satisfied, receive exceptionally fast assistance, and that no service gaps were found in the actual practical delivery. However, because the municipality formally processes only 11 to 22 dedicated financial counseling cases a year compared to roughly 6,000 general social assistance and emergency cases, their formal administrative pipelines for this sub-service have structurally eroded, resulting in legal sanctions for paperwork and procedural flaws despite excellent real-world outcomes.

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Debt counseling (økonomisk rådgivning) **WHAT WAS EXPECTED:** The supervisor required that all formal decisions (vedtak) regarding social services be approved by a separate person with decision-making authority, establishing a two-step maker/checker authorization process. **WHAT WAS FOUND:** The sole financial advisor had been approving their own decisions for a long time, and there were no written routines for who held formal approval authority. **WHY VOLUME IS THE REAL CAUSE:** The requirement assumes an office large enough to have multiple distinct, non-overlapping roles for caseworkers and approvers, which is structurally difficult in an office with only one dedicated debt counselor. **QUOTE:** "Alle vedtak etter sosialtjenesteloven skal godkjennes av en med vedtaksmyndighet. Det var ikke utarbeidet skriftlig rutine på hvem som har denne myndighet på Nav kontoret. Det hadde derfor utviklet seg en forståelse for at økonomisk rådgiver kunne godkjenne egne vedtak." **MUNICIPALITY:** Nordreisa **YEAR:** 2024/2025

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Debt counseling (økonomisk rådgivning) **WHAT WAS EXPECTED:** Extensive formal documentation of user situations, systematic journal entries in the municipal IT system, and formal written decisions (vedtak) for all advisory services provided. **WHAT WAS FOUND:** Caseworkers provided the necessary help but failed to log this systematically, and the dedicated debt counselor had to document their work in Microsoft Word because they lacked a proper module in the IT system. Caseworkers actually knew more about the users' situations than the journals reflected. **WHY VOLUME IS THE REAL CAUSE:** In a small community, caseworkers rely on direct personal knowledge of the users rather than heavy bureaucratic documentation, and a small municipality likely lacks the scale to justify procuring or configuring specialized IT modules for a single employee. **QUOTE:** "Gjeldsrådgiver har ikke skikkelig arbeidsverktøy i det kommunale saksbehandlingssystemet, slik at dennes arbeid dokumenteres i Word... Derimot ble det oppgitt at veilederne visste mer om brukernes situasjon enn det som kom fram av journalene." **MUNICIPALITY:** Nordreisa **YEAR:** 2024/2025

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Debt counseling (økonomisk rådgivning) **WHAT WAS EXPECTED:** A standardized, uniform routine where every instance of economic advice triggers a formal, repeatable pipeline starting with a written decision (vedtak) that includes start times and legal justifications. **WHAT WAS FOUND:** Staff lacked a shared written routine and often provided the service informally during ongoing, ad-hoc contact with users without ever generating formal paperwork. **WHY VOLUME IS THE REAL CAUSE:** A small office of ten people defaults to delivering services organically through direct, informal daily contact rather than maintaining a rigid, bureaucratic pipeline designed for processing high volumes of distinct cases. **QUOTE:** "De ansatte ved Nav-kontoret har ikke en felles forståelse for når og hvordan det skal fattes vedtak om tjenesten. Ut ifra intervju med ansatte, ledere og brukere vurderer vi at tjenesten gis i et større omfang enn det som kommer frem av antall vedtak og skriftlig dokumentasjon i saksmappene." **MUNICIPALITY:** Nordreisa **YEAR:** 2024/2025

CLOSING FLAG Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

I rate the evidence as **strong**. The report explicitly acknowledges that users are actually receiving good, timely help and are satisfied with their follow-up ("Brukere har i intervju opplyst at de i kontakt med Nav har fått god hjelp og at hjelpen har kommet tidsnok", "Brukerne vi snakket med virket fornøyd"). The municipality is being sanctioned almost entirely because its informal, small-scale operational style fails to meet the formal documentation, rigid role-separation, and IT-system requirements designed for a much larger bureaucracy.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Debt counseling (Økonomisk rådgjeving) WHAT WAS EXPECTED: The supervisor required the municipality to draft and issue a formal written legal decision (enkeltvedtak) under § 17 prior to providing economic advice,. WHAT WAS FOUND: The caseworkers successfully provided the economic advice (often verbally, informally, or via digital channels) but failed to generate the formal administrative paperwork for it,. WHY VOLUME IS THE REAL CAUSE: The requirement to convert spontaneous, dynamic social work into a formal administrative pipeline imposes a heavy paperwork burden that assumes a back-office capacity frontline workers in smaller offices simply do not have. QUOTE: "Dei oppfyller ikkje dei formelle krava til å fatte vedtak, men oppfyller plikta til å gi rådgiving." MUNICIPALITY: Hustadvika kommune YEAR: 2024

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Debt counseling (Økonomisk rådgjeving) WHAT WAS EXPECTED: The municipality was expected to formally document, register, and archive all ongoing dialogue and information from user follow-ups in the central IT system to ensure traceability,. WHAT WAS FOUND: Caseworkers maintained continuous, dynamic contact with users via SMS and phone, but failed to manually transfer and archive these informal text interactions into the formal "Socio" IT system. WHY VOLUME IS THE REAL CAUSE: Archiving informal SMS dialogue into a central IT database is a highly cumbersome administrative compliance task that falls disproportionately on frontline workers who lack dedicated clerical or back-office support. QUOTE: "Mykje av oppfølginga skjer på SMS som ikkje alltid vert lagra i Socio, men vert liggande på rettleiar sin mobil." MUNICIPALITY: Hustadvika kommune YEAR: 2024

CLOSING FLAG This report shows **strong** evidence of a municipality being sanctioned for structural scale problems rather than actual poor practice. The supervisor explicitly acknowledges that the municipality successfully fulfills its duty to provide good advice and notes that users are highly satisfied with the help they receive. The sanctions are entirely based on the office's failure to maintain a heavy, formal bureaucratic apparatus—specifically drafting legal decisions for routine advice and manually archiving text messages—which penalizes the practical administrative realities of the office rather than the actual quality of its social work,.

Finding 1 MECHANISM: [S] SPECIALIZATION DOMAIN: financial/debt counseling WHAT WAS EXPECTED: The supervisor expected the municipality to provide specialized economic advice for serious debt problems, categorized as level 3 cases. WHAT WAS FOUND: The municipality has no permanent employee handling level 3 cases and lacks a specialized function for financial advice, yet generalists are dealing with level 3 issues. WHY VOLUME IS THE REAL CAUSE: The municipality's extremely low caseload cannot financially or practically sustain a full-time, dedicated specialist just for complex debt cases. QUOTE: "Nav Hole har ingen fast ansatt som jobber med nivå 3 saker." MUNICIPALITY: Hole kommune YEAR: 2025

Finding 2 MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: financial/debt counseling WHAT WAS EXPECTED: The supervisor expected management to conduct quality assurance of casework and for there to be formal oversight ensuring correct decisions. WHAT WAS FOUND: The frontline caseworkers approve their own decisions under the Social Services Act, and management does not perform internal quality checks or sample controls on these decisions. WHY VOLUME IS THE REAL CAUSE: This requirement assumes an organizational structure large enough to separate case processing from approval and quality assurance, which is structurally impossible when only three generalist employees handle all social services. QUOTE: "Det er hovedsakelig tre ansatte som behandler saker etter Lov om sosiale tjenester. Veilederne godkjenner sine egne vedtak etter sosialtjenesteloven." MUNICIPALITY: Hole kommune YEAR: 2025

Finding 3 MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: financial/debt counseling WHAT WAS EXPECTED: The office was expected to have systematic procedures to log unrecorded needs, track application dates uniformly, and comprehensively document all casework. WHAT WAS FOUND: The caseworkers rely on informal solutions like physical sticky notes and personal familiarity with the users, leading to inconsistent documentation and varied interpretations of when an application starts. WHY VOLUME IS THE REAL CAUSE: In a small community where caseworkers personally know the small pool of users, maintaining a rigid, large-scale administrative pipeline feels redundant and is naturally replaced by informal tracking. QUOTE: "Kontoret benytter seg av ulike løsninger, herunder et system med fysiske lapper. De ansatte opplyser at de kjenner brukerne godt, og at det er lett for brukerne å komme i kontakt med dem." MUNICIPALITY: Hole kommune YEAR: 2025

Finding 4 MECHANISM: [K] COMPETENCE SUSTAINABILITY DOMAIN: financial/debt counseling WHAT WAS EXPECTED: Caseworkers are expected to possess deep, specialized knowledge of the different levels of financial advice to ensure legally sound casework and properly adapted guidance. WHAT WAS FOUND: Employees lack systematic training, demonstrate uncertainty regarding the different advisory levels, and make formal errors in their decisions. WHY VOLUME IS THE REAL CAUSE: Caseworkers in this micro-office 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. QUOTE: "Det virker også å være opplæringsbehov blant de ansatte når det gjelder inngående kjennskap til hva de ulike nivåene i den økonomiske råd- og veiledningen innebærer... de kjenner til de ulike nivåene, men det virker å være en usikkerhet her som gjenspeiler seg iblant annet vedtak." MUNICIPALITY: Hole kommune YEAR: 2025

CLOSING FLAG

The evidence is **strong** that this municipality is being sanctioned for structural scale problems rather than actual poor practice. With a total of only three generalist caseworkers handling all social services for about 130 users, Hole NAV structurally lacks the scale to maintain dedicated debt specialists, separate quality assurance roles, or highly formalized administrative pipelines. The documented failures—such as self-approved decisions, reliance on physical sticky notes, and degraded competence in highly technical sub-fields—are the direct and inevitable consequences of running a micro-office, not an intentional disregard for quality.

Here are the findings extracted from the supervision report that demonstrate failures caused by structural scale problems and low case volume:

Finding 1

- **MECHANISM:** [S] SPECIALIZATION
- **DOMAIN:** Debt counseling (økonomisk rådgivning)
- **WHAT WAS EXPECTED:** The municipality must ensure continuous, accessible financial advice and initiate services based on urgency and the user's needs, rather than office capacity,.
- **WHAT WAS FOUND:** The municipality relies on a single debt counselor, meaning the entire service bottlenecks and cases are heavily delayed when this one specialist is absent, vacant, or at full capacity,. Preliminary mapping and urgent case processing completely halt until the specialist is available.
- **WHY VOLUME IS THE REAL CAUSE:** The municipality's small scale only justifies or allows for a single specialist position, making a continuous, uninterrupted specialist pipeline structurally impossible to maintain during routine absences or staff turnover.
- **QUOTE:** "Organiseringen medfører også at tjenesten er svært sårbart, ved gjeldsrådgivers fravær. Dette vil kunne medføre at tjenesten reelt sett ikke er tilgjengelig i perioder med fravær og/eller stor pågang eller venteliste."
- **MUNICIPALITY:** Løten kommune
- **YEAR:** 2025

Finding 2

- **MECHANISM:** [C] COORDINATION INFRASTRUCTURE
- **DOMAIN:** Debt counseling (økonomisk rådgivning)
- **WHAT WAS EXPECTED:** Clear, formalized distribution of tasks, routines, and boundaries (grensesnitt) between front-line generalist caseworkers and the back-office specialist,.

- **WHAT WAS FOUND:** The boundaries between the general caseworkers and the debt counselor are undefined, causing confusion among staff about who handles everyday financial guidance versus specialized debt advice.
- **WHY VOLUME IS THE REAL CAUSE:** In a small office of 28 people where staff share the same hallway and cover multiple overlapping functions to compensate for resource shortages, imposing rigid, formalized structural interfaces between "tiers" of service is unnatural and overly complex.
- **QUOTE:** "Grensesnittet mellom veiledere i økonomiteam og gjeldsrådgiver er ikke tydelig definert og avklart. Flere ansatte formidler usikkerhet knyttet til hva det er de faktisk skal gjøre..."
- **MUNICIPALITY:** Løten kommune
- **YEAR:** 2025

Finding 3

- **MECHANISM:** [K] COMPETENCE SUSTAINABILITY
- **DOMAIN:** Debt counseling (økonomisk rådgivning)
- **WHAT WAS EXPECTED:** The debt counselor must possess the active competence to manage all levels of debt counseling, including navigating formal, complex debt settlement processes (gjeldsordning),.
- **WHAT WAS FOUND:** The current debt counselor, having been in the position since September 2024, had not yet processed a single case involving formal debt settlement by the time of the inspection,.
- **WHY VOLUME IS THE REAL CAUSE:** A municipality with fewer than 8,000 residents generates highly advanced statutory debt settlement cases too infrequently for a single local counselor to build and sustainably maintain practical routine competence.
- **QUOTE:** "Det opplyses i intervju at nåværende gjeldsrådgiver ikke har hatt saker ennå der bruker søker eller har fått innvilget gjeldsordning."
- **MUNICIPALITY:** Løten kommune
- **YEAR:** 2025

Finding 4

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Debt counseling (Internal control)
- **WHAT WAS EXPECTED:** The municipality must systematically perform formalized, documented risk assessments, quality assurance sampling (stikkprøvekontroll), and portfolio reviews to ensure legal compliance,.
- **WHAT WAS FOUND:** Management failed to conduct the planned quality checks, portfolio reviews, or professional risk assessments, as they spent their time trying to make everyday operations function amidst long-term sick leave,,.
- **WHY VOLUME IS THE REAL CAUSE:** Small municipalities fighting daily resource shortages and vacancies in frontline teams lack the dedicated back-office administrative buffer required to maintain a heavy, continuous reporting and quality-control regime.

- **QUOTE:** "Nav-kontorets ledelse har ikke gjennomført stikkprøvekontroller som vist til i sin rutine for internkontroll eller porteføljegjennomgang. Ledelsen ved Nav-kontoret var dermed ikke fullt ut kjent med påpekte mangler i sakene..."
- **MUNICIPALITY:** Løten kommune
- **YEAR:** 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Rating: Strong

Reason: The core failures resulting in Løten's sanctions—massive service bottlenecks, undefined roles, and an inability to maintain internal controls—stem directly from their structural reliance on a single specialist in a small, thinly stretched office,,. While individual instances of poor documentation exist, the systemic collapse documented in the report is a direct consequence of holding a small-scale municipality to a standard of specialization and continuous administrative infrastructure that it structurally lacks the volume and resources to maintain,,.

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The municipality must issue a formal written decision (vedtak) that includes an assessment of urgency and sets a deadline for when the service will start, before actually providing the assistance. WHAT WAS FOUND: Frontline staff and the debt counselor often provide help immediately when needed, meaning formal decisions are often skipped entirely or written after the consultation has already taken place. WHY VOLUME IS THE REAL CAUSE: The expectation of a formal triage, decision, and queue pipeline assumes a high-volume environment where waitlists must be managed, whereas this small office has the capacity to simply help users immediately. QUOTE: "I noen tilfeller fattes vedtak etter at tjenesten allerede har startet. Ansatte opplyser at tjenesten anses som igangsatt når vedtak fattes, og at samtale med bruker da allerede er gjennomført." MUNICIPALITY: Tinn kommune YEAR: 2025

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The municipality must have specific written routines for financial counseling and must systematically document and journal every piece of financial advice given during follow-up. WHAT WAS FOUND: The municipality relies on a general routine for all social services rather than a specialized one; staff frequently give ad-hoc financial advice without logging it as a distinct formal service in the IT systems, sometimes keeping physical papers instead. WHY VOLUME IS THE REAL CAUSE: Maintaining separate specialized administrative routines and rigid, system-heavy documentation for a service that generates only 13 formal decisions a year imposes a

disproportionate bureaucratic burden on a small team of generalists. QUOTE: "Det er ikke utarbeidet skriftlige rutiner for økonomisk rådgivning etter § 17... Tilsynet viser at tjenesten ofte ytes uten vedtak og med mangelfull nedtegning, særlig når økonomisk veiledning gis av veiledere og saksbehandlere der det ikke fattes vedtak." MUNICIPALITY: Tinn kommune YEAR: 2025

CLOSING FLAG

This report shows **strong** evidence of a municipality being sanctioned for structural scale problems rather than poor practice. The supervisor explicitly acknowledges that the service is highly accessible, capacity is good, assistance is provided rapidly, and users are satisfied. The sanctions are based entirely on the municipality's failure to maintain the procedural pipelines (issuing formal decisions before starting) and documentation apparatuses (specialized written routines and strict journaling) that are designed to manage large-scale operations, not on a failure to help citizens.

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: debt counseling WHAT WAS EXPECTED: Management was expected to conduct formal, systematic portfolio reviews and random sampling (stikkprøver) to ensure all potential users were identified and followed up properly. WHAT WAS FOUND: Management did not perform these formal systematic oversight checks, despite the fact that they actively participate in casework and meetings with the users themselves. WHY VOLUME IS THE REAL CAUSE: The supervisory standard assumes a large, complex organization where management is structurally separated from operations and must rely on formal auditing (like random sampling) to maintain oversight, whereas in this 16-person office, the leaders are already embedded directly in the daily frontline work. QUOTE: "Ledelsen ved Nav Våler deltar både i samtaler om saker og i møter med brukere. Likevel vurderer vi at ledelsen ikke gjennomfører regelmessig internkontrolltiltak, som for eksempel stikkprøvekontroll, regelmessig porteføljegjennomgang." MUNICIPALITY: Våler kommune YEAR: 2025

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The municipality was required to conduct a formal risk and vulnerability analysis (ROS-analyse) when entering an agreement to use a national competence center for specialized debt counseling. WHAT WAS FOUND: The municipality had not conducted a formal ROS analysis for this outsourcing agreement prior to the inspection. WHY VOLUME IS THE REAL CAUSE: Small municipalities lacking the scale and caseload to attract full-time specialists are forced to rapidly outsource complex cases to external competence centers, but the supervisor still imposes a heavy administrative documentation regime (formal risk analyses) designed for the back-office capacities of larger municipal bureaucracies. QUOTE: "Verken ledelsen i Nav eller i kommunen har foretatt en risiko- og sårbarhetsanalyse ved inngåelsen av samarbeidet med kompetansesenteret." MUNICIPALITY: Våler kommune YEAR: 2025

CLOSING FLAG

This report provides **strong** evidence of a municipality being sanctioned for structural scale problems rather than poor practice. The supervisor explicitly notes that Våler provides good follow-up and that its managers are directly involved in user cases and know the users personally. However, the municipality is ultimately sanctioned for failing to maintain the formal bureaucratic control mechanisms—such as documented risk analyses for necessary outsourcing and systematic random sampling—that are expected of a much larger organization.

MECHANISM: [K] COMPETENCE SUSTAINABILITY DOMAIN: Activity duty (economic support for persons under 30) WHAT WAS EXPECTED: The supervisor expected the municipality to explicitly assess and document the child's best interest (barnets beste) when setting activity conditions for young parents. WHAT WAS FOUND: The municipality failed to include any assessment related to the child's best interest in the few decisions that involved parents. WHY VOLUME IS THE REAL CAUSE: Caseworkers encounter this specific demographic (parents under 30 applying for economic assistance) so rarely that they fail to maintain the routine and specialized competence required to trigger this specific legal assessment in practice. QUOTE: "Samtlige nevner i intervju at det er svært få barnefamilier i denne aldersgruppen som søker om økonomisk stønad. I de få vedtakene hvor det er stilt vilkår til foreldre med barn, kommer det ikke fram noen vurdering knyttet til barnets beste." MUNICIPALITY: Ringerike kommune YEAR: 2025

CLOSING FLAG

This report shows **weak** evidence of a municipality being sanctioned for structural scale problems rather than actual poor practice. Ringerike is a relatively large municipality with over 31,000 inhabitants, and its NAV office is organizationally complex, featuring a dedicated Youth Department with seven specialized caseworkers, a distinct decision-maker (beslutter) team, and regular subject-matter meetings. Aside from the isolated issue of handling extremely rare cases of young parents, the vast majority of the documented violations—such as failing to document individual assessments, omitting legal grounds in decisions, and lacking functional management oversight—are explicitly attributed to poor administrative routines and inadequate internal control rather than a lack of operational scale.

Here are the findings extracted from the supervision report where mechanisms of structural scale problems are visible:

MECHANISM: **[S] SPECIALIZATION** DOMAIN: Debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The municipality was expected to provide accessible, timely counseling for complex debt problems and never reject individuals in need due to internal capacity constraints. WHAT WAS FOUND: Users with heavy debt cases face wait times of up to a year, and some are entirely rejected due to a lack of capacity at the office. WHY VOLUME IS THE REAL CAUSE: The municipalities' combined small population only sustains funding for a single specialized financial advisor (handling level 2 and 3 cases), creating an insurmountable structural bottleneck that cannot absorb fluctuations in demand. QUOTE: "I tyngre gjeldssaker, som krever spesialisert kompetanse, er tjenesten økonomisk rådgivning ikke alltid tilgjengelig innen forsvarlig tid. [...] I noen tilfeller blir brukere også avvist med begrunnelse i manglende kapasitet ved kontoret." MUNICIPALITY: Nav Vefsna (covering Vefsn and Grane municipalities) YEAR: 2025

MECHANISM: **[D] DOCUMENTATION APPARATUS** DOMAIN: Debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The office must issue formal, written administrative decisions (vedtak) whenever a user is placed on a waitlist, in order to formalize their legal right to appeal the delay. WHAT WAS FOUND: Caseworkers perform preliminary assessments and maintain telephone contact with waitlisted users, but fail to generate the formal written legal decisions documenting the delay. WHY VOLUME IS THE REAL CAUSE: In a small office lacking dedicated administrative or back-office intake staff, frontline workers deprioritize the heavy documentation regime of drafting formal delay notices in order to focus on urgent triage and basic casework. QUOTE: "Når en person blir satt på venteliste blir det ikke fattet vedtak, og personen får ikke mulighet til å klage. Det er brudd på sosialtjenesteloven..." MUNICIPALITY: Nav Vefsna YEAR: 2025

CLOSING FLAG

This report provides **strong** evidence of a municipality being sanctioned for structural scale problems rather than actual poor practice. The supervisor explicitly praises the office for its high-quality routines, internal collaboration, and excellent follow-up in basic cases, demonstrating that their core practice is sound. The specific violations triggering the sanctions—severe wait times and missing administrative paperwork for waitlists—are direct symptoms of a small office stretching a single specialist across two municipalities, inevitably causing systemic bottlenecks.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The Nav office was expected to systematically document all assessments, holistic mappings (including special expenses for children), and continuous follow-up plans in the central digital system (Socio). WHAT WAS FOUND: Caseworkers documented information inconsistently across multiple platforms (Socio, Teams, paper) and lacked formal, comprehensive journal entries, even though they personally knew more about the

users' situations than the written records reflected. WHY VOLUME IS THE REAL CAUSE: The strict, comprehensive documentation regime imposes a heavy administrative burden that frontline caseworkers in a smaller office struggle to maintain, leading them to rely on direct, informal knowledge of their clients rather than exhaustive paperwork. QUOTE: "Det ble bekreftet i intervjuene med ansatte og ledere at det er mangler ved journalføringen. Derimot ble det oppgitt at veilederne visste mer om brukerens situasjon enn det som kom fram av journalen." MUNICIPALITY: Nannestad (Nav Nannestad Gjerdrum) YEAR: 2024

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: debt counseling WHAT WAS EXPECTED: The municipality was required to issue a formal administrative decision (vedtak) detailing the start date and justification for every instance of financial advice, even for basic or preventative guidance. WHAT WAS FOUND: Generalist counselors organically provided financial advice (levels 1 and 2) during regular user meetings without triggering the formal decision-making pipeline; only the specialized financial advisors issued formal decisions for highly complex cases. WHY VOLUME IS THE REAL CAUSE: The requirement assumes a repeatable, highly bureaucratic pipeline for every minor intervention, whereas generalists in this office naturally integrate basic financial guidance into everyday interactions without the capacity for constant administrative overhead. QUOTE: "I intervju med ansatte ble det oppgitt at tjenesten blir gitt uten vedtak fra veiledere. Det er kun de økonomiske rådgiverne som fatter vedtak." MUNICIPALITY: Nannestad (Nav Nannestad Gjerdrum) YEAR: 2024

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: debt counseling WHAT WAS EXPECTED: Clear, formalized routines defining the exact distribution of responsibility, tasks, and authority between generalist counselors and specialized financial advisors, specifically dictating at what point a case must be formally handed over. WHAT WAS FOUND: There were no strict routines delineating who was responsible for "level 2" advice, making it somewhat arbitrary whether a generalist or a specialist handled it, despite caseworkers finding it easy to informally transfer cases. WHY VOLUME IS THE REAL CAUSE: The demand for rigid role delineation assumes a highly compartmentalized internal structure, whereas in this office, generalists and specialists collaborate fluidly based on immediate needs rather than strict systemic boundaries. QUOTE: "Det er ikke rutiner for hvordan ansvar, oppgaver og myndighet er fordelt, og når saken skal henvises til økonomisk rådgiver. I praksis medførte dette at det var utydelige og noe vilkårlig om bistand på nivå 2 ble gitt av veileder eller økonomisk rådgiver." MUNICIPALITY: Nannestad (Nav Nannestad Gjerdrum) YEAR: 2024

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as strong, moderate, or weak, and state your reason.

I rate the evidence as **moderate**. The report explicitly acknowledges that users are receiving the necessary help, wait times are short, and caseworkers possess good actual knowledge of their clients' situations. However, the municipality is heavily sanctioned for lacking the complex bureaucratic scaffolding—such as formalized legal decisions for low-level advice,

rigid role separation, and exhaustive documentation routines—that a larger organizational scale would naturally necessitate and support.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: activity duty WHAT WAS EXPECTED: The municipality was expected to have comprehensive routines for registering professional deviations (faglige avvik) in a formal quality/deviation system. WHAT WAS FOUND: The office lacks comprehensive routines for logging deviations in decisions and does not use the formal deviation system for professional errors, relying instead on direct feedback. WHY VOLUME IS THE REAL CAUSE: A smaller office naturally relies on immediate, informal quality assurance and direct dialogue during routine decision approvals, making a heavy, formal deviation-reporting bureaucracy feel redundant. QUOTE: "Det er ikke omfattende rutiner for avvik i vedtak, begrunnet med kontorets størrelse og at kvalitetssikring gjøres ved vedtaksgodkjenning." MUNICIPALITY: Nav Vestby YEAR: 2025

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: activity duty WHAT WAS EXPECTED: The municipality is required to offer various low-threshold activities to ensure customized, immediate follow-up when imposing activity conditions on youths. WHAT WAS FOUND: The municipality struggles to set conditions early because they no longer operate their own immediate municipal activity measure and must instead wait for state-level measures with long waitlists. WHY VOLUME IS THE REAL CAUSE: Operating a continuous, dedicated local activity program specifically for youths requires a critical mass of cases to be financially and operationally viable, forcing the municipality to depend on bottlenecked state programs. QUOTE: "Det oppgis i intervjuer at kommunen tidligere hadde et kommunalt tiltak. Det var da enklere å stille vilkår, samt stille vilkår på et tidlig tidspunkt, ettersom det da var et tilbud tjenestemottakere raskt kunne møte opp til. I flere intervjuer vises det til utfordringer med ventetider på statlige tiltak." MUNICIPALITY: Nav Vestby YEAR: 2025

CLOSING FLAG This report provides **weak to moderate** evidence of a municipality being sanctioned for structural scale problems rather than poor practice. While the municipality explicitly cites its small size as the reason for its informal documentation apparatus, and its lack of an internal activity pipeline clearly hinders its ability to set conditions, much of the supervisor's criticism is directed at actual casework negligence. Vestby is a mid-sized municipality with a dedicated youth team ("mestringsteam"), yet they are systematically failing to conduct basic individual legal assessments, such as automatically exempting youths receiving state benefits without evaluating their specific circumstances.

MECHANISM: [T] THRESHOLD-DEPENDENT QUALITY DOMAIN: general management/quality control WHAT WAS EXPECTED: The Nav office should utilize results from user and employee surveys to build a knowledge base for continuous service improvement. WHAT WAS FOUND: The office is too small to receive local-level data from surveys, leaving them with little data-driven knowledge for formal improvement work. WHY

VOLUME IS THE REAL CAUSE: Quantitative surveys require a minimum threshold of respondents (caseload/staff) to be statistically valid and adequately anonymized at the local office level. QUOTE: "Det kommer videre fram i intervju med ansatte at kommunen og kontoret er for lite til at resultater fra bruker- og ansattundersøkelser blir formidlet til lokalt nivå. Det gir lite kunnskapsgrunnlag til bruk i forbedringsarbeid." MUNICIPALITY: Nesna YEAR: 2024

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: debt counseling / financial advice WHAT WAS EXPECTED: The office should have formalized professional meetings (fagmøter) and systematized arenas for discussing individual cases to ensure consistent, unified practice. WHAT WAS FOUND: The office lacks formal meeting arenas for professional case discussions; employees simply discuss cases directly with each other or the leader ad-hoc. WHY VOLUME IS THE REAL CAUSE: In a micro-office with only 2.5 municipal full-time equivalents, coordination happens organically through continuous daily interaction rather than requiring scheduled, structured inter-departmental meetings. QUOTE: "Det mangler formelle fora for å drøfte enkeltsaker og faglige problemstillinger. Manglende systematikk for kunnskapsdeling og drøfting av enkeltsaker utgjør en risiko for at Nav-kontoret ikke opptrer som en felles enhet..." MUNICIPALITY: Nesna YEAR: 2024

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: general management/quality control WHAT WAS EXPECTED: The municipality should systematically use the digital deviation and procedure system (Compilo) to register deviations and perform formal Risk and Vulnerability (ROS) analyses. WHAT WAS FOUND: The system is barely used, there is low knowledge of deviation registration, and the staff lacks the specific competence required to perform formal ROS analyses. WHY VOLUME IS THE REAL CAUSE: Operating heavy, formalized risk management and compliance software assumes dedicated administrative or quality-assurance roles that a tiny six-person frontline office cannot support. QUOTE: "Gjennom intervju er det entydig opplyst at Compilo benyttes i liten grad, det er lav kunnskap om avviksregistrering og hva som er et avvik. [...] Den delen av Compilo som handler om ROS-analyser, krever en kompetanse som mange ikke har i tilstrekkelig grad." MUNICIPALITY: Nesna YEAR: 2024

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: debt counseling / financial advice WHAT WAS EXPECTED: The office should use standardized mapping forms (kartleggingsskjema) and maintain fully updated written routines to ensure a uniform mapping process for all users. WHAT WAS FOUND: The office does not use mapping forms, lacks a uniform theoretical understanding of what must be mapped, and maintains outdated written routines and plans. WHY VOLUME IS THE REAL CAUSE: Maintaining perfectly updated written manuals and standard procedural forms assumes a high-volume, repeatable pipeline; smaller offices tend to rely on tailored, individual oversight rather than rigid paper forms. QUOTE: "Kontoret har heller ikke kartleggingsskjema som er i bruk eller noen felles forståelse for hva som skal kartlegges." (alongside: "Skriftlige rutiner er ikke oppdaterte.") MUNICIPALITY: Nesna YEAR: 2024

CLOSING FLAG The evidence is **moderate**. While the municipality was not formally sanctioned with a legal violation (the inspection was closed without breaches), the

supervisory report heavily critiques the office for lacking formal professional meeting arenas, extensive written routines, and advanced risk analysis competence. These criticisms reflect the structural realities of a micro-office lacking scale and administrative infrastructure, especially since the report simultaneously praises the office for its highly accessible, fast, and closely followed-up frontline casework.

MECHANISM: [S] SPECIALIZATION DOMAIN: Financial assistance (families with children) WHAT WAS EXPECTED: The Nav office is required to systematically identify, map, and assess the specific needs of children in vulnerable families applying for aid. WHAT WAS FOUND: There is no dedicated responsibility for families with children; cases are instead distributed generally to all caseworkers based on the user's birth date, resulting in generic assessments. WHY VOLUME IS THE REAL CAUSE: The relatively low total number of families with children receiving aid (71 children in 2022) makes a dedicated child-welfare specialist role unsustainable, forcing the office to rely on generalists who cover everything. QUOTE: "Det er ingen ved kontoret som har eit spesielt ansvar for barnefamiliar, dei er likt fordelt mellom dei tilsette." MUNICIPALITY: Giske kommune YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance (mapping and assessment) WHAT WAS EXPECTED: Comprehensive written documentation and formal journal notes proving that children's needs were explicitly mapped and considered during caseworker conversations. WHAT WAS FOUND: Written documentation of assessments is sparse or non-existent, despite caseworkers asserting they know the users well, understand their needs, and keep the children in mind informally. WHY VOLUME IS THE REAL CAUSE: In a small-scale community setting, caseworkers rely on informal, internalized knowledge of their small client base rather than maintaining the heavy, formal documentation apparatus required by the state supervisor. QUOTE: "Tilsette seier at sjølv om det ikkje kjem fram i journalnotat har dei barna i tankane. Tilsette opplyser og at dei opplever sjølv at dei har god kontroll over brukarane sine behov..." MUNICIPALITY: Giske kommune YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Internal control (deviation reporting) WHAT WAS EXPECTED: A clear, functioning internal control system for registering deviations (avvik) to ensure continuous quality improvement. WHAT WAS FOUND: Employees do not report deviations because they are confused by the parallel state and municipal systems, and municipal workers in the Nav office lack access to the municipality's own reporting system. WHY VOLUME IS THE REAL CAUSE: The structural requirement to navigate complex, dual-level IT and reporting infrastructures (state vs. municipal) overwhelms a small office where generalists seamlessly cross jurisdictions to handle both types of tasks. QUOTE: "Kommunen nyttar internkontrollsystemet Compilo. Tilsette som yt kommunale tenester i Nav Giske har ikkje tilgang til det. Statleg internkontroll nyttar ASYS for avviksregistrering. I tilsynet kom det fram at det er uklart for fleire tilsette kva som oppfattast som avvik, og kvar det skal meldast." MUNICIPALITY: Giske kommune YEAR: 2023

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Financial assistance (application procedures) WHAT WAS EXPECTED: Consistent use of formalized procedures and standardized mapping forms for processing social services applications to ensure all needs are uncovered. WHAT WAS FOUND: Existing written procedures from 2016 are completely unknown to staff, and newly developed mapping forms are ignored in practice, leaving the process up to individual discretion. WHY VOLUME IS THE REAL CAUSE: Standardized bureaucratic pipelines fail to take root because a low volume of formalized case processing leads caseworkers to bypass rigid forms in favor of ad-hoc, individualized approaches. QUOTE: "«Prosedyre for søknad om sosiale tenester Nav Giske», sist evaluert 26.01.2016 er ikkje kjent for tilsette." MUNICIPALITY: Giske kommune YEAR: 2023

CLOSING FLAG

I rate the evidence as **moderate**. While the report clearly sanctions Giske for structural scale issues—such as lacking specialized children's caseworkers, relying on informal local knowledge over extensive documentation, and struggling with complex, dual-level IT and deviation systems—there is also distinct evidence of actual poor practice. Findings such as granting emergency aid continuously for 11 weeks, utilizing severely outdated minimum aid rates, and dealing with the fallout of massive staff turnover (8 new hires in one year) point to severe capacity breakdowns and negligence that go beyond mere scaling disadvantages.

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Financial advice (økonomisk rådgjeving) **WHAT WAS EXPECTED:** The NAV office must follow a formal administrative pipeline by making formal written decisions (vedtak) before or alongside providing the service. **WHAT WAS FOUND:** The office frequently bypassed the formal decision-making process, opting instead to just provide the practical help directly and immediately without writing a formal resolution. **WHY VOLUME IS THE REAL CAUSE:** The rigid bureaucratic pipeline of application and formal decision-making is unnatural and inefficient in a micro-office where staff can just immediately assist the user. **QUOTE:** "Statsforvaltaren finn at brukarene i praksis får tenesta og at det blir fatta skriftelege vedtak, men at terskelen før det blir fatta vedtak er for høg. Tenesta blir likevel stort sett gitt i tide og i tilstrekkeleg omfang når brukar ønsker hjelpa." **MUNICIPALITY:** Hjelmeland **YEAR:** 2024

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Financial advice (økonomisk rådgjeving) **WHAT WAS EXPECTED:** Systematic use of detailed mapping forms (kartleggingsskjema) to uncover all aspects of a user's life, and rigorous journaling of all interactions to ensure verifiability. **WHAT WAS FOUND:** Case workers used mapping forms varyingly and journaling was inconsistent, largely because they already knew the users' personal situations and adjusted their questions accordingly. **WHY VOLUME IS THE REAL CAUSE:** In a municipality of only 2,655 people, caseworkers rely on deep personal knowledge of their community rather than exhaustive bureaucratic documentation designed for anonymous, high-volume offices. **QUOTE:** "Rettleiarane opplyser at dei kjenner

brukarane sine godt og at det kan verke inn på kva dei spør om. Det blir vurdert individuell kor mykje det er behov for å kartlegge av andre forhold rund brukar sin livssituasjon." **MUNICIPALITY:** Hjelmeland **YEAR:** 2024

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Financial advice (økonomisk rådgjeving) **WHAT WAS EXPECTED:** Management must implement formal internal controls, specifically through a dedicated Risk and Vulnerability (ROS) analysis for the service and routine management spot checks (stikkprøver) on cases. **WHAT WAS FOUND:** The office only had a general ROS analysis, and the leader performed no formal spot checks, though she had a complete overview of the casework. **WHY VOLUME IS THE REAL CAUSE:** The requirement assumes a structural separation between management and frontline staff, which is impossible in a 5-person office where the manager is also the office's primary specialized debt counselor. **QUOTE:** "Nav-leiar følgjer med på området gjennom møteverksemd, saksgodkjenning og i si rolle som gjeldsrådgivar. Det er ikkje blitt gjennomført stikkprøvekontroll på området." **MUNICIPALITY:** Hjelmeland **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? The municipality was not formally sanctioned, as the State Administrator concluded there were **no legal violations**. However, I rate the evidence of scale-driven compliance friction as **strong**. Every single "area for improvement" identified by the supervisor—bypassing formal written decisions, relying on personal knowledge rather than mapping forms, and lacking formal management spot checks—is a direct, logical adaptation to operating a 5-person office in a municipality of 2,655 people, rather than evidence of negligence or poor service to the users.

Based on the analysis of the supervision report from NAV Nærøysund, most of the findings point to classic negligence and poor administrative practice (e.g., relying on standardized rates instead of individual assessments, and failing to actually speak to users). However, there are instances where the failures are linked to heavy documentation and reporting burdens placed on frontline staff.

Here are the findings where a structural mechanism is visible:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance / Advice and guidance (opplysning, råd og veiledning) WHAT WAS EXPECTED: The supervisor required the NAV office to formally document their social work, follow-up, and guidance by issuing formal, legally binding administrative decisions (enkeltvedtak) under § 17 of the Social Services Act. WHAT WAS FOUND: The municipality did not have a practice of writing formal § 17 administrative decisions for families who needed follow-up and guidance. WHY VOLUME IS THE REAL CAUSE: The requirement to convert informal social work and

guidance into formal, appealable administrative paperwork imposes a heavy administrative burden that frontline caseworkers often lack the back-office capacity to maintain. QUOTE: "Statsforvalteren vurderer at NAV-kontoret ikke har som praksis å fatte vedtak etter § 17 til familier som har behov for oppfølging." MUNICIPALITY: Nærøysund kommune YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance / Mapping (kartlegging) WHAT WAS EXPECTED: Caseworkers were expected to thoroughly document all mapping interactions with families by writing detailed journal notes after every conversation. WHAT WAS FOUND: The audited case files contained very few journal notes showing whether conversations actually took place or what specific needs were mapped. WHY VOLUME IS THE REAL CAUSE: The strict documentation regime falls entirely on frontline workers, and compliance fails when local management cannot allocate sufficient dedicated time or administrative support for logging informal interactions. QUOTE: "Rutiner som sier at det skal skrives journalnotat etter samtaler, vil eksempelvis ha liten effekt dersom det ikke er satt av tilstrekkelig tid eller ressurser til å gjøre det." MUNICIPALITY: Nærøysund kommune YEAR: 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

I rate the evidence as **weak**. Nærøysund actually operates as an inter-municipal host (vertskommune) for three municipalities and has dedicated, specialized teams (including a specific "Team Sosial" and dedicated debt counselors). The vast majority of the violations in this report—such as never asking about children's needs, rubber-stamping applications based on standardized rates, denying support without probability assessments, and granting emergency aid for up to 22 days without review—point to systemic poor practice and a culture of passive desk-processing rather than structural limitations caused by small scale.

Here are the findings from the supervision report where failures are explicitly linked or clearly implied to be caused by structural scale problems and low case volume mechanisms.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance (child assessments) WHAT WAS EXPECTED: The municipality was expected to systematically write down and document comprehensive mappings of children's situations, individual assessments, and professional discretion in case files and decisions. WHAT WAS FOUND: The assessments and casework discussions were happening verbally (e.g., in team meetings and colleague consultations) but were not formally documented in decisions, journal notes, or meeting minutes. WHY VOLUME IS THE REAL CAUSE: The intensive requirement to formally log all discretionary considerations assumes a back-office capacity that frontline generalists lack when managing broad tasks across a five-municipality service

area. QUOTE: "Tilsynet fikk høre om vurderinger som blir gjort, for eksempel i fagmøter, men disse finnes ikke igjen i vedtak, journalnotat eller referat fra fagmøter." MUNICIPALITY: Alstahaug (Nav Ytre Helgeland) YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Internal control / Quality management WHAT WAS EXPECTED: The municipality should use its formal deviation system (Compilo) to report professional deviations upward so that management can monitor service quality. WHAT WAS FOUND: Professional deviations are not reported in the formal deviation system and thus remain invisible to top management, even though caseworkers actively discuss complex cases and routines in local professional meetings. WHY VOLUME IS THE REAL CAUSE: Formal upward reporting systems assume a complex, hierarchical organization, whereas this small office functions through informal, horizontal coordination and a low threshold for daily colleague discussion. QUOTE: "Faglige avvik fanges ikke opp og meldes ikke i avvikssystemet og blir lite synlige for ledelsen." MUNICIPALITY: Alstahaug (Nav Ytre Helgeland) YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: Financial assistance (legal discretion) WHAT WAS EXPECTED: Caseworkers should make individual discretionary legal assessments beyond standard norms (under § 19) and clearly articulate how different factors are weighted in each specific case. WHAT WAS FOUND: The office systematically relies on the state's standard norms, uses standardized text for rejections, and struggles to conduct independent legal reasoning on discretionary exceptions. WHY VOLUME IS THE REAL CAUSE: Deep, individualized legal analysis requires specialized legal-welfare expertise, which a small, generalized workforce—where all employees must cover the whole service area across municipalities—cannot realistically sustain. QUOTE: "Ved avslag brukes standardtekst som viser til at det ikke er rimelighetsgrunn til å innvilge etter § 19. 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." MUNICIPALITY: Alstahaug (Nav Ytre Helgeland) YEAR: 2023

CLOSING FLAG

This report shows **moderate** evidence of a municipality being sanctioned for structural scale problems rather than purely poor practice. While there is a clear documentation burden and reliance on standardized routines typical of small offices lacking specialization, the report explicitly states that caseworkers are currently facing an increased caseload (due to more refugees) alongside fewer resources. Therefore, the core underlying issue seems to be a mix of acute resource starvation and time pressure, rather than exclusively a lack of scale to sustain operations.

Here are the findings from the supervision report where failures can be attributed to structural mechanisms of scale and volume.

Finding 1

- **MECHANISM:** [C]
- **DOMAIN:** Financial assistance / Management
- **WHAT WAS EXPECTED:** The Nav leader is expected to actively monitor service quality, participate in the municipal director's management meetings, and oversee caseworkers in the municipal IT system.
- **WHAT WAS FOUND:** The Nav leader does not attend regular municipal management meetings and completely lacks access to the municipal IT system used for social services. This is largely because she is a shared, temporary resource managing two different offices on opposite sides of the county.
- **WHY VOLUME IS THE REAL CAUSE:** The municipality's small scale necessitates sharing a manager across multiple offices in a vast region (vertskommunesamarbeid), breaking the central assumption of a dedicated, locally integrated leader with seamless access to single-municipality systems.
- **QUOTE:** "Vi stiller spørsmålstegn ved Nav-leders mulighet for styring og kontroll på området, da hun ikke har tilgang til det kommunale fagsystemet, og jobber som Nav-leder for to Nav-kontor i fylket."
- **MUNICIPALITY:** Hammerfest (Nav Hammerfest-Måsøy)
- **YEAR:** 2023

Finding 2

- **MECHANISM:** [D]
- **DOMAIN:** Quality control / Financial assistance
- **WHAT WAS EXPECTED:** The office must use a formal deviation system (avvikssystem) to register, report, and track professional and academic errors for continuous improvement.
- **WHAT WAS FOUND:** Employees solve mistakes informally and verbally without entering them into the formal deviation software (QM+ or ASYS).
- **WHY VOLUME IS THE REAL CAUSE:** In a small department with only four caseworkers managing financial assistance, errors can be resolved instantly through informal verbal communication, making formal documentation regimes feel like unnecessary administrative overhead.
- **QUOTE:** "Avdelingsleder fortalte at de løste feil uten å melde dette som avvik. Fagansvarlig fortalte at hun opplevde at muntlige avvik blir fulgt opp av ledelsen, men at hun ikke prioriterer å melde avvik inn i avvikssystemene."
- **MUNICIPALITY:** Hammerfest (Nav Hammerfest-Måsøy)
- **YEAR:** 2023

Finding 3

- **MECHANISM:** [C]
- **DOMAIN:** Financial assistance / Internal mapping
- **WHAT WAS EXPECTED:** NAV must conduct a systematic, holistic mapping of families' and children's needs using their own internal tools and routines.

- **WHAT WAS FOUND:** NAV caseworkers informally rely on the municipal immigrant service (innvandrertjenesten) to map users without a systematized cooperation agreement, leading to gaps where not all users' needs are assessed by NAV.
- **WHY VOLUME IS THE REAL CAUSE:** A small municipality relies heavily on informal, ad-hoc collaboration between its few local agencies rather than having formalized, distinct procedural pipelines built within NAV itself.
- **QUOTE:** "Flere veiledere viste til at innvandrertjenesten kartlegger brukere, og noe av denne informasjonen brukes av Nav-kontoret... Det fremstår ikke som at det er et systematisert samarbeid med innvandrertjenesten om kartlegging..."
- **MUNICIPALITY:** Hammerfest (Nav Hammerfest-Måsøy)
- **YEAR:** 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? **Rate the evidence as moderate.**

While there are clear indicators of scale-related friction—such as an overstretched manager shared across multiple offices, reliance on informal agency collaboration, and informal deviation reporting typical of small teams—the report also documents genuine poor practice. For instance, caseworkers failed to implement a 2022 legal change regarding child benefits and consistently failed to map children's individual needs or conduct follow-up conversations, which cannot be solely attributed to a lack of organizational scale.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: internal control / financial assistance WHAT WAS EXPECTED: A formal, systematic registration of professional errors and deviations in designated IT reporting systems (ASYS and QM+) to ensure institutional learning. WHAT WAS FOUND: Errors are resolved informally and verbally among the caseworkers and management, and are intentionally not logged in the formal deviation systems. WHY VOLUME IS THE REAL CAUSE: In an office with only four caseworkers managing financial assistance, errors are easily communicated and resolved directly, making a formal bureaucratic logging regime feel redundant and disproportionately burdensome. QUOTE: "Avdelingsleder fortalte at de løste feil uten å melde dette som avvik. Fagansvarlig fortalte at hun opplevde at muntlige avvik blir fulgt opp av ledelsen, men at hun ikke prioriterer å melde avvik inn i avvikssystemene." MUNICIPALITY: Hammerfest Municipality YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: management / internal control WHAT WAS EXPECTED: A fully present, dedicated office leader integrated into the municipal management team, participating in weekly meetings, and holding direct access to municipal IT systems to conduct quality control. WHAT WAS FOUND: The NAV leader is a temporary, shared resource managing two different offices across the county, meets the municipal director only "as needed," and lacks access to the municipal casework system. WHY

VOLUME IS THE REAL CAUSE: The municipality's scale leads to pooling the state-employed NAV leader role with another municipality, precluding the dedicated, fully integrated local presence the supervisory standards assume. QUOTE: "Vi stiller spørsmålstegn ved Nav-leders mulighet for styring og kontroll på området, da hun ikke har tilgang til det kommunale fagsystemet, og jobber som Nav-leder for to Nav-kontor i fylket." MUNICIPALITY: Hammerfest Municipality YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: mapping / financial assistance WHAT WAS EXPECTED: Formalized, systematic coordination routines between the NAV office and the municipal immigration service regarding the mapping of shared users' needs. WHAT WAS FOUND: The immigration service conducts user mapping and shares relevant information with NAV, but the supervisor deemed this collaboration insufficiently "systematized". WHY VOLUME IS THE REAL CAUSE: In a small municipal administration, departments naturally rely on informal, direct communication about a small pool of shared users rather than establishing rigid, formalized institutional coordination protocols. QUOTE: "Flere veiledere viste til at innvandrertjenesten kartlegger brukere, og noe av denne informasjonen brukes av Nav-kontoret... Det fremstår ikke som at det er et systematisert samarbeid med innvandrertjenesten om kartlegging..." MUNICIPALITY: Hammerfest Municipality YEAR: 2023

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: internal control WHAT WAS EXPECTED: A systematized method to extract and filter a specific portfolio of cases (families with children receiving financial assistance) for internal quality audits. WHAT WAS FOUND: The office lacks a systematized internal control mechanism to pull these specific cases from their systems. WHY VOLUME IS THE REAL CAUSE: With only 166 children in the entire municipality living in families receiving assistance, building complex data-extraction pipelines for portfolio audits is an over-engineered requirement for a caseload that is small enough to be manually known to the four caseworkers. QUOTE: "Nav-kontorets internkontroll er ikke systematisert på en slik måte at man får gjort et utplukk av saker som omhandler familier som mottar økonomisk stønad." MUNICIPALITY: Hammerfest Municipality YEAR: 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as **weak**, and state your reason.

While the report clearly highlights structural friction in how the municipality's management, internal control, and deviation reporting systems are organized, the core violations driving the severe sanctions are rooted in genuine frontline negligence. The caseworkers are failing to map children's basic needs, relying heavily on standard copy-pasted texts instead of making individual assessments, and in some cases illegally factoring child benefits into financial assistance calculations. These are fundamental failures in basic social work practice and legal compliance, not artifacts of scale.

Based on the provided supervision report, here are the findings where failures are visibly driven by mechanisms of low volume or small scale:

MECHANISM: [K] COMPETENCE SUSTAINABILITY DOMAIN: emergency financial assistance (nødhjelp) WHAT WAS EXPECTED: The Nav office must conduct a swift but individualized mapping and assessment of children's specific needs when a family applies for acute emergency financial assistance. WHAT WAS FOUND: The office bypassed individualized assessments for children in emergency cases, relying instead on rigid, non-compliant standard rates (120 kr/adult, 80 kr/child). WHY VOLUME IS THE REAL CAUSE: The municipality encounters very few emergency cases involving families with children, which makes it difficult to maintain the specialized routine of individual child welfare assessments under severe time constraints, causing staff to default to static, standardized rates. QUOTE: "Når det gjelder nødhjelp viser vedtakene at det ikke er foretatt en tilstrekkelig kartlegging av barna. Det er få saker som omhandler stønad i en nødssituasjon til barnefamilier." MUNICIPALITY: Nesodden YEAR: 2023

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: financial assistance (samvær / visitation expenses) WHAT WAS EXPECTED: The office must have a consistent assessment and processing standard for granting expenses related to child visitation rights. WHAT WAS FOUND: Caseworkers exhibited varying and inconsistent practices regarding how visitation expenses were handled, which went entirely undiscovered by the office's internal control. WHY VOLUME IS THE REAL CAUSE: The office processes so few cases involving child visitation expenses that a normalized, repeatable procedural pipeline fails to form, resulting in ad hoc, inconsistent case processing. QUOTE: "Tilsynet har avdekket noen få saker der kontoret gjør ulikt når det gjelder utgifter til samvær. Dette er ikke oppdaget i vedtakskontrollen." MUNICIPALITY: Nesodden YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: internal control / documentation WHAT WAS EXPECTED: Systematic, written documentation of child mapping using dedicated forms, and the use of a formal quality system (Compilo) to report professional errors and deviations. WHAT WAS FOUND: Case mapping is largely conducted informally and orally, dedicated child-mapping forms go mostly unused, and the formal deviation reporting system is ignored. WHY VOLUME IS THE REAL CAUSE: In a moderately scaled office environment, caseworkers rely heavily on direct, oral communication rather than engaging with the heavy, formal documentation and deviation-reporting apparatus expected by state supervisors. QUOTE: "Saksutredningen/kartleggingen oppgis at i stor grad skjer muntlig." MUNICIPALITY: Nesodden YEAR: 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

I rate the evidence as **weak**. While the report explicitly links low case frequency to procedural inconsistencies in niche areas like emergency assistance and visitation rights, Nesodden is not a micro-municipality; it has over 20,000 residents and 34 Nav employees. The bulk of the sanctions actually target poor management practices—specifically the leadership's failure to enforce existing written routines, implement formal internal controls, and document the generally good (but orally conducted) work that the caseworkers are already performing.

MECHANISM: [K] COMPETENCE SUSTAINABILITY **DOMAIN:** Social help / mapping children's needs **WHAT WAS EXPECTED:** The municipality must conduct a holistic mapping of children's needs (health, housing, social network, daily life) and make concrete, individual decisions based on "the child's best interest". **WHAT WAS FOUND:** Counselors work entirely as generalists, fail to systematically map children's complex needs, and are explicitly unsure of what "the child's best interest" actually entails in practice. **WHY VOLUME IS THE REAL CAUSE:** With only 315 total social help cases annually distributed across a team of generalists, each individual counselor encounters complex child-welfare assessments too infrequently to maintain the specialized legal and psychological competence required. **QUOTE:** "Ansvar for brukerne er fordelt på fødselsdato, og kartlegging av familien skal gjøres av den som er tildelt ansvaret for brukeren. Veilederne jobber som generalister." / "I intervju med de ansatte var noen usikre på hva som ligger i begrepet «barnets beste»..." **MUNICIPALITY:** Senja **YEAR:** 2023

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Social help / advisory services (§ 17) **WHAT WAS EXPECTED:** NAV must formalize its follow-up, advice, and guidance by enacting formal administrative decisions (vedtak) under Section 17, granting the user formal complaint rights. **WHAT WAS FOUND:** The office makes almost no formal Section 17 decisions, with counselors instead providing ongoing, informal advice during regular conversations as needed. **WHY VOLUME IS THE REAL CAUSE:** The requirement to force advisory conversations through a formal, repeatable pipeline of legal decision-making is excessively rigid for an office where low volume means follow-up naturally occurs through informal, personal contact. **QUOTE:** "Det er fattet få vedtak om § 17 i de sakene vi har gjennomgått. [...] I intervju fortalte de ansatte at de ga fortløpende råd og veiledning i samtaler med brukerne, alt etter som behovet var. Flere sa de ikke hadde fattet vedtak etter § 17." **MUNICIPALITY:** Senja **YEAR:** 2023

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Quality management / deviation reporting **WHAT WAS EXPECTED:** The municipality must have a functioning internal control system where professional deviations (faglige avvik) are systematically registered, processed, and used for continuous organizational learning. **WHAT WAS FOUND:** Employees rarely report professional deviations, are unsure what they even are, and lack clear routines for following them up outside of standard health and safety (HMS)

issues. **WHY VOLUME IS THE REAL CAUSE:** Operating a formalized, bureaucratic reporting loop dedicated to "professional deviations" assumes an organizational scale and back-office administrative capacity that a smaller office lacks, as errors are typically handled and corrected informally. **QUOTE:** "Det er ikke klare rutiner for når og hvordan avvik skal følges opp for å sikre forbedring og læring i virksomheten. Mangel på registering og oppfølging av avvik som ikke dreier seg om HMS kan medføre at avvik ikke meldes..." **MUNICIPALITY:** Senja **YEAR:** 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Social help / interdisciplinary collaboration **WHAT WAS EXPECTED:** Systematic follow-up discussions and structured collaboration with other municipal services to ensure coordinated, comprehensive help for families. **WHAT WAS FOUND:** There is little trace of collaboration with other services in the case files, and employees provide disparate answers about how interdisciplinary cooperation actually works. **WHY VOLUME IS THE REAL CAUSE:** The expectation of seamless, systematic interdisciplinary collaboration requires dedicated liaison roles or highly structured coordination pipelines, which cannot be sustained in an office relying entirely on generalists who distribute cases by birthdate. **QUOTE:** "Vi ser lite spor av samarbeid med andre tjenester i mappegjennomgangen. Ansatte gir litt forskjellige opplysninger om tverrfaglige samarbeid med andre etater..." **MUNICIPALITY:** Senja **YEAR:** 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

I rate the evidence as **moderate**. While Senja's reliance on generalists clearly creates structural friction with the state's expectations for highly specialized documentation, distinct formal pipelines for guidance (§ 17), and complex deviation reporting systems, the report also uncovers instances of genuine poor practice. For example, the office actively maintained policies that contradicted the law, such as illegally directing users to a municipal leisure fund before assessing social help, and failing to properly exclude child benefits from economic assessments. Therefore, the sanctions reflect a mix of structural scale mismatches and actual local negligence.

Based on the provided supervision report from NAV Horten, here is the finding that most closely aligns with the mechanisms of scale and volume.

MECHANISM: [S] DOMAIN: debt counseling WHAT WAS EXPECTED: The local NAV office must provide financial counseling for all users locally and must not reject people with a potential need by referring them to the national NAV debt counseling hotline. WHAT WAS

FOUND: Caseworkers frequently referred users with unmanageable debt to the national NAV hotline or other actors because the local employees did not know how to assist them. WHY VOLUME IS THE REAL CAUSE: Assisting users with severe, unmanageable debt requires specialized knowledge that a local office's generalist staff may not encounter frequently enough to maintain, making reliance on a high-volume national specialist hotline structurally logical. QUOTE: "Brukere som har gjeld, men mangler evne til å betjene den, har ofte ikke fått noe tilbud om rådgivning ved NAV Horten, men blir istedenfor henvist til Økonomi- og gjeldsrådgivningstelefonen i NAV eller andre aktører." MUNICIPALITY: Horten kommune YEAR: 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

The evidence in this report is **weak**. Horten is a relatively large municipality with a NAV office consisting of 95 employees and ample potential case volume among its 1,277 social assistance recipients. The failures documented are overwhelmingly driven by actual poor practice, internal mismanagement, and rigid organizational silos—such as artificially splitting the service into separate departments and broadly failing to train staff—rather than a structural inability to sustain the service due to small municipal scale.

Here are the findings from the supervision report where mechanisms of structural scale and capacity issues are visible:

Finding 1

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Financial assistance (Mapping of children's needs)
- **WHAT WAS EXPECTED:** The supervisor expected the municipality to systematically document the mapping of children's needs in dedicated journal notes to ensure traceability and formal record-keeping.
- **WHAT WAS FOUND:** Caseworkers bypass creating separate journal notes and instead enter information directly into the final decision documents to save time.
- **WHY VOLUME IS THE REAL CAUSE:** The requirement for multi-step, separate documentation (journal notes followed by decision documents) imposes an administrative burden that frontline caseworkers in a busy office collapse into a single step due to a lack of dedicated administrative time or support.
- **QUOTE:** "Det ble uttalt at informasjon fra kartleggingssamtalene ofte føres direkte inn i vedtakene fremfor at det blir opprettet egne notater. Dette for å spare tid i en hektisk arbeidshverdag."
- **MUNICIPALITY:** Notodden Municipality (NAV Notodden)

- **YEAR:** 2023

Finding 2

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Financial assistance (Assessments under § 19)
- **WHAT WAS EXPECTED:** The municipality must write out concrete, individualized assessments when considering exceptional financial support (Section 19) in the formal decision letters.
- **WHAT WAS FOUND:** While caseworkers actively discuss and assess these complex cases orally in team meetings, they rely on standardized text in the actual written decisions and fail to document the individualized legal rationale.
- **WHY VOLUME IS THE REAL CAUSE:** The office effectively utilizes oral coordination to handle complex assessments but lacks the back-office legal capacity to translate these collective, oral evaluations into highly individualized legal documentation.
- **QUOTE:** "Vi fikk opplyst at vurderinger etter § 19 blir foretatt gjennom drøftinger av saker i drøftingsmøtene, men at dette ikke kommer frem av vedtakene. Vurderingene blir sjeldent nedtegnet."
- **MUNICIPALITY:** Notodden Municipality (NAV Notodden)
- **YEAR:** 2023

Finding 3

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Financial assistance (Advice and guidance under § 17)
- **WHAT WAS EXPECTED:** The office must issue formal administrative decisions (enkeltvedtak) whenever they provide advice and guidance to users.
- **WHAT WAS FOUND:** Caseworkers routinely provide advice and guidance during user conversations, but they almost never generate the formal administrative decisions required to document that this service was provided.
- **WHY VOLUME IS THE REAL CAUSE:** The requirement to trigger a formal legal decision process for routine, verbal advice imposes a disproportionate reporting regime on frontline staff, who prioritize practical service delivery over administrative compliance.
- **QUOTE:** "NAV-kontoret fatter sjelden vedtak etter sosialtjenesten § 17, selv om de ansatte er kjent med at dette skal gjøres. Ansatte fortalte at de gir råd og veiledning i samtaler med brukere og skriftlig informasjon i andre vedtak."
- **MUNICIPALITY:** Notodden Municipality (NAV Notodden)
- **YEAR:** 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Rate the evidence as **weak**. While there are clear instances of caseworkers bypassing heavy documentation requirements ([D]) due to time constraints, the core sanctions stem from genuine poor practice, such as systematically failing to investigate or consider the basic needs of children in the first place. Furthermore, NAV Notodden operates as an inter-municipal partnership serving nearly 15,000 residents with a multi-department organizational structure, indicating that the failures are primarily rooted in poor internal routines and management follow-through rather than an unavoidable lack of structural scale.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance (Children's needs and holistic mapping) WHAT WAS EXPECTED: The supervisor expected the Nav office to conduct and explicitly document comprehensive, holistic mapping conversations regarding children's situations, as well as any guidance provided to the parents. WHAT WAS FOUND: The municipality failed to systematically document these assessments, instead relying on informal, undocumented knowledge of the families and brief summaries in the final financial decisions. WHY VOLUME IS THE REAL CAUSE: The Nav office operates with only three social service employees handling all tasks across multiple IT systems, lacking the back-office capacity or time to sustain a heavy, formal documentation regime. QUOTE: "Ansatte formidlet at de vet hva som skal og bør gjøres, men opplever ikke å ha mulighet til dette ut fra den faktiske ressurssituasjonen i kontoret." MUNICIPALITY: Grue kommune YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Financial assistance (Quality assurance and internal control) WHAT WAS EXPECTED: The municipality was required to have systematic, continuous internal control, quality assurance, and professional oversight (fagansvar) to ensure legal compliance and the safeguarding of children's perspectives. WHAT WAS FOUND: The municipality lacked systematic quality control and evaluation of social services, relying solely on the general Nav leader to approve decisions without a dedicated professional lead for these services. WHY VOLUME IS THE REAL CAUSE: A micro-team of just three social service employees within a nine-person office lacks the internal complexity to support structurally independent quality assurance layers or specialized management roles. QUOTE: "De sosiale tjenestene i Nav-kontoret er vurdert å være sårbare... Like fullt mangler Grue kommune, på tilsynstidspunktet, systematisk og kontinuerlig kvalitetssikring og evaluering av de sosiale tjenestene..." MUNICIPALITY: Grue kommune YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Inter-agency collaboration WHAT WAS EXPECTED: The Nav office was expected to initiate and formally document collaboration with other municipal and regional services to provide holistic follow-up for families. WHAT WAS FOUND: The municipality failed to document inter-agency collaboration in their case files, even though employees could verbally provide examples of such collaboration actively occurring. WHY VOLUME IS THE REAL CAUSE: In a very small municipality, collaboration often happens organically and informally between a handful of generalists who know each other, making the burden of formally documenting every interaction disproportionate to the actual operational reality. QUOTE: "I saksgjennomgangen

fikk vi høre eksempel på samarbeid med andre instanser i en konkret sak, men vi fant ikke dokumentasjon i saken på slikt samarbeid." MUNICIPALITY: Grue kommune YEAR: 2023

CLOSING FLAG

Yes, this report shows a municipality being sanctioned primarily for structural scale problems rather than actual poor practice. I rate the evidence as **strong**. The findings explicitly highlight that the office has only three social service employees who are highly vulnerable due to a generalized task portfolio, leading them to prioritize rapid service delivery over the heavy, formalized documentation and quality-assurance regimes demanded by the supervisor. Furthermore, the municipality itself had already recognized these exact scale-related vulnerabilities and politically decided to merge with neighboring municipalities to build a "more robust professional environment" prior to this inspection.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: financial support (økonomisk stønad / barneperspektiv) WHAT WAS EXPECTED: The supervisor expected detailed, written documentation of concrete and individual assessments of each child's situation to be clearly visible within the formal decision letters. WHAT WAS FOUND: The written decisions frequently lacked visible documentation of these concrete and individual assessments, even though interviews revealed that caseworkers knew the families well and were actively conducting the assessments verbally during team meetings. WHY VOLUME IS THE REAL CAUSE: The rigorous, formalized reporting regime falls entirely on frontline generalists in a small office facing heavy work pressure, leading them to rely on efficient, informal verbal coordination rather than comprehensive back-office write-ups. QUOTE: "I flertallet av vedtakene vi gikk igjennom i forkant av tilsynet, var den konkrete og individuelle vurderingen som ligger til grunn for beslutningen ikke synlig i vedtaket." MUNICIPALITY: Nord-Fron (Nav Midt-Gudbrandsdal) YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: social work / holistic mapping (sosialfaglig arbeid) WHAT WAS EXPECTED: The supervisor expects deep, specialized competence in holistic mapping and discretionary assessment ("skjønnsutøvelse") when evaluating the complex needs of vulnerable children and families. WHAT WAS FOUND: Employees experienced it as challenging to maintain this deep social work expertise because the office uses a generalist model where "everyone does everything." The supervisor noted this organizational model inherently causes variations in competence among staff, requiring a dedicated "resource group" to continually compensate for the lack of specialized frontline caseworkers. WHY VOLUME IS THE REAL CAUSE: The municipality's small scale cannot sustain dedicated specialists solely for family social work, forcing a generalist model that makes it highly difficult for individual caseworkers to master complex, specialized socio-legal assessments alongside all their other duties. QUOTE: "Flere av de ansatte pekte på at helhetlig kartlegging er en del av faget sosialt arbeid... Dette oppleves som en utfordring ved kontorets organisering, der alle skal gjøre alt." MUNICIPALITY: Nord-Fron (Nav Midt-Gudbrandsdal) YEAR: 2023

CLOSING FLAG

The evidence that this municipality was *sanctioned* for structural scale problems is **weak**, primarily because the State Administrator ultimately concluded that **no violations were uncovered** and issued no formal sanctions. However, the report strongly illustrates structural scale problems in action: the criticisms regarding variable competence and inadequate written documentation stem directly from the office's small-scale generalist model, demonstrating how national standards for specialization and bureaucratic reporting strain a municipality that successfully ensures quality through close-knit, informal verbal coordination rather than complex back-office infrastructure.

Here are the findings from the supervision report where failures are driven by structural scale and volume issues rather than sheer negligence:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Internal control / Quality management WHAT WAS EXPECTED: Caseworkers should systematically record non-conformities and deviations in the municipality's centralized internal control system. WHAT WAS FOUND: Frontline caseworkers lack access to the municipality's internal control system (Compilo); instead, they must write manual reports to the NAV leader, who is the only person with access and must input them manually. WHY VOLUME IS THE REAL CAUSE: The municipality employs an enterprise-scale compliance system with access structures that turn the single manager of a 9-person office into an administrative bottleneck. QUOTE: "Kommunen har sin internkontroll i Compilo. Rettleiarane ved Nav Averøy har ikkje tilgang til dette systemet, berre Nav-leiar har ein slik tilgang." MUNICIPALITY: Averøy kommune YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Documentation / Follow-up WHAT WAS EXPECTED: Complete and visible documentation of follow-up activities within the correct municipal casework system. WHAT WAS FOUND: Follow-up is often invisible in the main municipal system because caseworkers must navigate and log information across several different and overlapping professional IT systems. WHY VOLUME IS THE REAL CAUSE: In a small office of fewer than nine full-time equivalents, frontline generalists must work across both state and municipal services without the specialized administrative back-office support needed to handle complex, fragmented IT infrastructures. QUOTE: "Det blir opplyst at journalføring i fleire fagsystem fører til at oppfølging ikkje alltid er synlege i det kommunale saksbehandlingssystemet." MUNICIPALITY: Averøy kommune YEAR: 2023

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Financial assistance WHAT WAS EXPECTED: A concrete, documented assessment of whether to apply "economies of scale" (stordriftsfordel) deductions when calculating financial assistance for large families. WHAT WAS FOUND: The principle is rarely practiced, and when it is occasionally used in a case, the specific reasoning is not documented in the decision. WHY VOLUME IS THE REAL CAUSE: The municipality has very few extremely large families receiving assistance,

meaning the office lacks the steady case volume necessary to establish and maintain a repeatable procedure for this specific, uncommon calculation. QUOTE: "«Stordriftsfordel» ved vurdering av større familiar sitt behov for økonomisk stønad er lite praktisert ved Nav Averøy." MUNICIPALITY: Averøy kommune YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Internal control / Quality management WHAT WAS EXPECTED: Scheduled internal audits, including a triannual (tertial) review of decisions where the leader selects a sample of cases to evaluate for quality. WHAT WAS FOUND: The scheduled triannual reviews and associated reporting templates are not followed up or completed. WHY VOLUME IS THE REAL CAUSE: A formalized, calendar-based sampling and reporting regime assumes dedicated administrative or quality-assurance capacity, which falls completely on the sole operational leader of a tiny office that recently saw its caseload double. QUOTE: "Det er mellom anna bestemt at det skal vere ein tertial gjennomgang av vedtak, og leiar har ansvar for utplukk. Det blir ikkje følgt opp." MUNICIPALITY: Averøy kommune YEAR: 2023

CLOSING FLAG This report provides **moderate** evidence of a municipality being sanctioned for structural scale problems. While there are undeniable instances of poor social work practice—such as failing to properly map children's needs or incorporate their views—many of the systemic control, documentation, and coordination failures occurred because a tiny generalist office was overwhelmed by a sudden doubling of its caseload due to refugee intake. The supervisory expectations impose enterprise-level administrative, auditing, and multi-system IT requirements on a small group lacking any dedicated back-office support.

Here are the findings extracted from the supervision report that demonstrate mechanisms of scale-related failure. Sør-Varanger is a small municipality with a very low volume of cases (only 1.8% of its 9,928 residents receive social assistance, compared to the 2.5% national average).

MECHANISM: [S] SPECIALIZATION **DOMAIN:** Financial assistance / Child perspective **WHAT WAS EXPECTED:** In-depth, individualized mapping of every child's specific situation, including health, housing, care situation, social network, and leisure activities. **WHAT WAS FOUND:** The office performs inadequate, superficial mapping of children's specific needs, and caseworkers handling users under 30 are organized as broad generalists covering all welfare and employment fields simultaneously,. **WHY VOLUME IS THE REAL CAUSE:** The municipality's low caseload forces the office to rely on generalist caseworkers who must cover every discipline, making it structurally impossible to sustain the deep, specialized focus required for complex child welfare assessments. **QUOTE:** "Veilederne som jobber med brukergruppen under 30 år jobber som generalister. Det vil si at veilederne som jobber med denne gruppen har ansvar for alle fagområdene, både sosiale tjenester og arbeidsrettet oppfølging." **MUNICIPALITY:** Sør-Varanger **YEAR:** 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Inter-agency cooperation **WHAT WAS EXPECTED:** Systematic collaboration supported by written cooperation agreements with other municipal services (like child welfare, substance abuse, and psychiatric services),. **WHAT WAS FOUND:** Caseworkers collaborate with other services on an individual, ad-hoc basis, but the office lacks overarching, written systemic agreements. **WHY VOLUME IS THE REAL CAUSE:** The expectation of formal, written inter-agency agreements assumes complex, siloed municipal departments that need institutional bridges, whereas in a small municipality, coordination naturally occurs informally case-by-case. **QUOTE:** "Vi fikk informasjon gjennom intervju om at veilederne har samarbeid med andre tjenester i enkeltsaker. Vi oppfatter ikke at det foreligger systematisk samarbeid med andre tjenester. Vi har ikke sett eller fått informasjon om at Nav-kontoret har skriftlige samarbeidsavtaler med andre tjenester i kommunen." **MUNICIPALITY:** Sør-Varanger **YEAR:** 2023

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Quality assurance / Internal control **WHAT WAS EXPECTED:** Systematic execution of "stikkprøvekontroller" (random spot checks/sampling) over time to uncover service failures. **WHAT WAS FOUND:** The office failed to continuously conduct random sampling of cases as part of its formal internal control routine. **WHY VOLUME IS THE REAL CAUSE:** Statistical spot-checking assumes a high-volume, continuous production line where systemic errors can be caught via sampling, which makes little practical sense in a local office processing a very small number of cases. **QUOTE:** "Kontoret har utarbeidet skjema for egenkontroll som en del av internkontrollen. Manglende gjennomføring av stikkprøvekontroller over tid har gjort at svikt i tjenestene heller ikke er avdekket gjennom internkontroll." **MUNICIPALITY:** Sør-Varanger **YEAR:** 2023

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Deviation management (Avvikshåndtering) **WHAT WAS EXPECTED:** Systematic reporting of professional deviations using formal deviation software (the municipal deviation system),. **WHAT WAS FOUND:** Caseworkers did not use the formal deviation system, instead opting to report professional deviations verbally and informally directly to their manager. **WHY VOLUME IS THE REAL CAUSE:** In a small office with short physical and organizational distances, forcing frontline staff to log deviations in a heavy administrative software system feels redundant compared to just speaking directly with the local leader. **QUOTE:** "Veilederne informerte gjennom intervju at de melder faglige avvik til sin leder, og ikke gjennom et avvikssystem." **MUNICIPALITY:** Sør-Varanger **YEAR:** 2023

CLOSING FLAG

Rating: Moderate. The report clearly contains examples of genuine poor practice that violate national standards—such as illegally applying outdated municipal rates, failing to do basic individual assessments for families, and improperly utilizing child benefits in casework,,. However, several of the supervisor's systemic criticisms—specifically demanding formal written inter-agency agreements, statistical spot-checking routines, and the use of heavy deviation software—**strongly penalize the municipality for operating informally**, which is a natural, scale-driven consequence of having a tiny caseload rather than an indicator of negligence,,,.

Based on the analysis of the supervision report for Nav Àvjovàrri, here are the findings where structural scale mechanisms are visible as the underlying cause of the sanctioned failures.

MECHANISM: [S] SPECIALIZATION DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The supervisor expected that counselors systematically identify users' needs for financial counseling and possess comprehensive competence regarding the service's specific content, scope, and mapping requirements. WHAT WAS FOUND: The municipality failed to ensure all employees had this specialized competence, leading to situations where users' needs were not systematically identified and informed. WHY VOLUME IS THE REAL CAUSE: The municipality's extremely small scale (approx. 2,800 inhabitants) forces a structure where all 12 counselors must operate as generalists covering all NAV domains, making it structurally unviable to maintain the deep, specialist-level expertise expected for a complex niche service like financial counseling. QUOTE: "Nav Àvjovàrri har ikke sørget for at alle ansatte har tilstrekkelig kompetanse om tjenesten økonomisk rådgivning. Dette på bakgrunn av ansattes opplysninger om manglende kunnskap og forståelse av tjenestens innhold og omfang." MUNICIPALITY: Kautokeino (Nav Àvjovàrri) YEAR: 2025

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: other (Internal control / Quality management) WHAT WAS EXPECTED: The municipality was expected to use a formal, documented internal control apparatus, specifically utilizing a dedicated digital system (Compilo) to log professional deviations, and for management to systematically and formally review journal notes. WHAT WAS FOUND: The office was cited for poor internal control because they had "little culture" for logging professional deviations in the formal system, and management did not formally track practice through journal reviews. WHY VOLUME IS THE REAL CAUSE: In a small office of only 12 employees, quality assurance and deviation reporting naturally occur through direct, informal communication with the visible NAV leader and via weekly team meetings, rendering a heavy, formalized digital reporting regime disproportionate and redundant. QUOTE: "Kontoret har liten kultur for å melde faglige avvik i avvikssystemet, foruten at de melder fra til Nav leder." MUNICIPALITY: Kautokeino (Nav Àvjovàrri) YEAR: 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as **Moderate**.

While the municipality was formally sanctioned for breaches regarding service availability and internal control, the evidence strongly suggests these are structural scale problems. The office is penalized because its generalist staff cannot master specialist-level knowledge across all domains, and because their small, tight-knit team relies on direct verbal communication with leadership rather than satisfying the heavy, formal documentation regimes designed for larger bureaucracies.

Here are the findings from the Båtsfjord supervision report that demonstrate scale-related mechanisms rather than actual poor practice.

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Debt counseling / Internal control **WHAT WAS EXPECTED:** Employees should use the municipality's formal, digital deviation system (Compilo) to report professional, organizational, and HSE deviations. **WHAT WAS FOUND:** The caseworkers did not know how to use or access the formal deviation system, and instead simply reported any professional deviations directly to the Nav manager. **WHY VOLUME IS THE REAL CAUSE:** In a micro-office with only six full-time employees, direct verbal communication with the manager replaces formal bureaucratic reporting software, making heavy documentation apparatuses functionally obsolete for daily operations. **QUOTE:** "Veilederne har ikke kunnskaper om kommunens avvikssystem, Compilo og de tror ikke de har tilgang til dette. Kontoret har ingen kultur for å melde faglige avvik i avvikssystemet, foruten at de melder fra til Nav-leder." **MUNICIPALITY:** Båtsfjord Kommune **YEAR:** 2024

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Debt counseling (Service availability) **WHAT WAS EXPECTED:** All employees, including state employees, should be able to systematically identify, inform about, and log a user's need for the municipal financial advisory service before passing them on. **WHAT WAS FOUND:** State employees did not have a crystal clear understanding of the exact parameters of the municipal financial advisory service, so whenever "economy" came up as a topic, they simply referred the user directly to their municipal colleagues. **WHY VOLUME IS THE REAL CAUSE:** In an office where only two specific people handle the municipal Social Services Act, "internal coordination" naturally defaults to simply pointing the user to the specialist sitting in the same room, rather than training all state employees to act as an initial formal diagnostic filter. **QUOTE:** "De statlige ansatte er kjent med at tjenesten økonomisk rådgivning finnes, men det kommer frem i intervju at ikke alle har helt klart for seg hva tjenesten innebærer og at den er noe annet enn økonomisk stønad. Dersom økonomi kommer opp som tema, henvises disse videre til kommunale veiledere." **MUNICIPALITY:** Båtsfjord Kommune **YEAR:** 2024

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Debt counseling / Internal control **WHAT WAS EXPECTED:** The office should have a formalized, written routine specifying exactly what criteria must be checked when approving decisions (vedtak). **WHAT WAS FOUND:** There was no formal written routine for what to check in the decisions, though the caseworkers were confident the manager ensured good professional quality because the manager personally read and approved all decisions. **WHY VOLUME IS THE REAL CAUSE:** When an office only has two municipal caseworkers and one manager who reads every single document produced, quality assurance is an organic, continuous oversight process rather than a formalized procedural checklist. **QUOTE:** "Kontoret har ingen rutine for hva som skal kontrolleres i vedtakene, men veilederne er trygge på at leder følger med på at

arbeidet som utføres har god faglig kvalitet." **MUNICIPALITY:** Båtsfjord Kommune **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as strong, moderate, or weak, and state your reason.

Yes, the evidence is strong. Båtsfjord is a very small municipality with only six permanent NAV employees, and the initial legal violations cited by the State Administrator—concerning internal control and service availability—were driven by the office's reliance on informal, face-to-face communication rather than formalized bureaucratic systems. The report explicitly notes that actual users felt they received "good information and quick help" and experienced comprehensive follow-up, demonstrating that the "failures" were entirely related to structural compliance (lack of written routines and formal system use) rather than poor practice or harm to the residents.

MECHANISM: [S] SPECIALIZATION DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The municipality was expected to have a robust and continuously available service for handling complex, level-3 financial and debt counseling cases. WHAT WAS FOUND: The municipality relies entirely on a single specialized employee located at the Housing Office; when this individual is absent, no one else in the municipality has the competence to provide the service. WHY VOLUME IS THE REAL CAUSE: A municipality of this size inherently lacks the case volume to justify hiring more than one dedicated level-3 debt specialist, making the expected organizational redundancy practically impossible. QUOTE: "Boligkontoret, og dermed kommunen, har en person som er spesialist i økonomisk rådgivning. Er spesialisten fraværende er det ingen andre som har kompetanse til å gi innbyggerne med nivå tre-saker økonomisk rådgivning." MUNICIPALITY: Nes kommune YEAR: 2024

MECHANISM: [K] COMPETENCE SUSTAINABILITY DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: Frontline NAV caseworkers must systematically identify needs and draft formal legal decisions (rettighetsvedtak etter § 17) for every individual requiring financial counseling. WHAT WAS FOUND: Caseworkers frequently fail to issue these formal decisions, expressing uncertainty about when and how to do so, and instead resort to giving informal advice without legally binding decisions. WHY VOLUME IS THE REAL CAUSE: With only 14 such decisions made across the entire municipality in a full year by a ~40-person office, individual caseworkers encounter this specific legal requirement too rarely to maintain the practical competence needed to execute it confidently. QUOTE: "Det ble i 2023 fattet totalt 14 vedtak til brukere hjemlet i § 17 [...] Ansatte er usikre på når vedtak skal fattes. Dermed ser vi en sammenheng mellom usikkerhet om vedtak på

tjenesten økonomisk rådgivning blant ansatte og at de ikke gir brukere rettighetsvedtak på tjenesten." MUNICIPALITY: Nes kommune YEAR: 2024

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: debt counseling (økonomisk rådgivning) WHAT WAS EXPECTED: The NAV office is expected to have tailored internal control routines and checklists for approving legal decisions specifically regarding financial counseling. WHAT WAS FOUND: The office relies on a generic approval checklist designed for standard financial social assistance, which does not properly fit the specific requirements of § 17 counseling decisions. WHY VOLUME IS THE REAL CAUSE: Developing, maintaining, and training staff on a highly specific administrative quality-control pipeline for a procedure that occurs roughly once a month is structurally inefficient compared to merging it with high-volume tasks. QUOTE: "Kontrollspørsmålene som er lagt inn i skjemaet som skjønnsmessig kan brukes er i liten grad tilpasset vedtak etter § 17. Rutinen gir i liten grad hjelp og støtte til saksbehandlere som skal godkjenne vedtak etter § 17." MUNICIPALITY: Nes kommune YEAR: 2024

CLOSING FLAG

The evidence in this report is **moderate**. While Nes is a medium-sized municipality, the specific domain of specialized debt counseling has extremely low volume (only 14 formal decisions in a year), which clearly drives scale-related failures like reliance on a single vulnerable specialist and skill degradation among frontline workers who rarely practice the procedure. However, the report also highlights genuine organizational fragmentation—such as siloing the service under different municipal managers without formal coordination agreements—and basic failures to log obvious needs, which point to poor management practices rather than just structural scale limitations.

Here are the findings from the supervision report where the failures are structurally tied to the municipality's small scale and low case volume:

FINDING 1

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Debt counseling / financial advice
- **WHAT WAS EXPECTED:** Systematic journaling and formal documentation of the identification of users' needs, their economic mapping, and written administrative decisions (vedtak) for the counseling provided.
- **WHAT WAS FOUND:** The office identifies needs and provides the service in practice, but fails to extensively journal this in the files or consistently write formal legal decisions, instead relying on personal, ongoing knowledge of the users.
- **WHY VOLUME IS THE REAL CAUSE:** Small offices with very few staff build holistic, personal knowledge of their limited user base, making heavy, formal bureaucratic

journaling and decision-writing feel disproportionately burdensome for frontline generalists.
- **QUOTE:** "Statsforvalteren legger til grunn at det er små forhold ved Nav-kontoret, hvor de ansatte har god kjenn-skap til brukerne... Tjenesten som gis journalføres ikke godt nok."
- **MUNICIPALITY:** Nav Numedal (Rollag, Flesberg, Nore og Uvdal)
- **YEAR:** 2024

FINDING 2

- **MECHANISM:** [C] COORDINATION INFRASTRUCTURE
- **DOMAIN:** Debt counseling / financial advice
- **WHAT WAS EXPECTED:** Formal management control systems (styringstiltak) to uncover failures, including routines for decision approval (vedtaksgodkjenning) and aggregated statistical overviews to steer the service.
- **WHAT WAS FOUND:** Internal control is primarily trust-based, and the office lacks formalized approval routines and aggregated overviews of users' needs.
- **WHY VOLUME IS THE REAL CAUSE:** An office with only four social services staff operates through flat, informal daily communication rather than tiered management structures, lacking the internal complexity to support dedicated compliance-checking or multi-stage approval workflows.
- **QUOTE:** "I intervju med tilsynslaget informerer kommuneledelsen at internkontroll for denne tjenesten er i hovedsak tillitsbasert ovenfor de ansatte ved Nav-kontoret. [...] Manglende rutine for vedtaksgodkjenning utgjør også en risiko for at saksbehandlingsfeil i form av manglende begrunnelse av oppstartsdatoen ikke blir avdekket."
- **MUNICIPALITY:** Nav Numedal (Rollag, Flesberg, Nore og Uvdal)
- **YEAR:** 2024

FINDING 3

- **MECHANISM:** [P] PROCEDURAL CONTINUITY
- **DOMAIN:** Debt counseling / financial advice
- **WHAT WAS EXPECTED:** A standardized, uniform process and tools (like a specific checklist) for mapping users' economy and family situation systematically upon initial contact.
- **WHAT WAS FOUND:** Employees used varied practices and mapped users organically over time as trust was built, rather than following a standardized initial checklist, though they shared a common understanding of the goal.
- **WHY VOLUME IS THE REAL CAUSE:** A tiny team manages cases organically through close personal contact, rendering rigidly standardized procedural tools—which are meant to ensure consistency across a large, high-turnover workforce—unnecessary in their daily practice.
- **QUOTE:** "Statsforvalteren vurderer at Nav-kontoret ikke har en felles praksis når det gjelder kartlegging ved oppfølging av tjenesten. Det tas for eksempel ikke i bruk eget kartleggingsskjema. Statsforvalteren er likevel av den oppfatningen at det er en omforent praksis blant de ansatte om at det skal gjennomføres utvidet kartlegging over tid."

- **MUNICIPALITY:** Nav Numedal (Rollag, Flesberg, Nore og Uvdal)
- **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? The evidence is **strong**. The supervisor explicitly acknowledges the small scale ("små forhold") of the office and the staff's good personal knowledge of their users, yet sanctions them for lacking the extensive journaling, multi-tier decision approvals, and standardized control pipelines typical of large bureaucracies. The municipality is essentially being penalized for using the informal, trust-based methods that naturally emerge in a tiny organization to deliver services, rather than demonstrating actual negligence in helping citizens.

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Financial advice (økonomisk rådgjeving) **WHAT WAS EXPECTED:** The supervisory authority expected the NAV office to generate formal, standalone administrative decisions (vedtak etter § 17) for all levels of financial counseling, including simpler guidance. **WHAT WAS FOUND:** The municipality provided the actual counseling to users, but generalist caseworkers often organically integrated this advice into other ongoing services—such as the refugee introduction program, voluntary financial management, or general social assistance—without drafting separate § 17 documentation. **WHY VOLUME IS THE REAL CAUSE:** In a small municipality where caseworkers act as generalists providing holistic, cross-program support, the demand to atomize natural counseling conversations into discrete, formal legal documents imposes a bureaucratic overhead that assumes dedicated administrative specialization rather than integrated frontline work. **QUOTE:** "Vi høyrde i intervju, og såg i journalnotat, at brukarane får mykje rettleiing utan at det blir gjort vedtak etter § 17. Det kom fram i intervju og i mappene at økonomisk rettleiing òg vert gitt i vedtak om sosialhjelp etter § 18, med tilvising til § 17." **MUNICIPALITY:** Kvam herad **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

The evidence for this is **weak**. Although the preliminary report threatened a sanction based on a structural scale issue (Mechanism D)—expecting generalists who already delivered integrated counseling to separate it into distinct administrative paperwork—the municipality was ultimately not sanctioned. The final inspection report concluded there were no legal

violations after the municipality quickly updated its internal routines to produce the requested formal administrative paperwork.

FINDING 1

- **MECHANISM:** [P] PROCEDURAL CONTINUITY
- **DOMAIN:** Debt counseling (Økonomisk rådgivning)
- **WHAT WAS EXPECTED:** The NAV office was expected to have a fixed, correct practice to actively identify, write down, and formally process oral inquiries as official applications for financial advice.
- **WHAT WAS FOUND:** The municipality lacked a systematic routine for recognizing and registering oral inquiries as formal applications, meaning some requests were only documented as journal notes rather than triggering formal processing.
- **WHY VOLUME IS THE REAL CAUSE:** With only 5 to 8 formal financial counseling cases per year across an entire office processing thousands of social assistance cases, a repeatable procedural pipeline for intercepting and formalizing rare oral requests cannot naturally sustain itself.
- **QUOTE:** "Nav-kontoret har svært få saker om økonomisk rådgivning, sammenlignet med antall saker om økonomisk sosialhjelp. Det kan skyldes ulike forhold. Én årsak kan være at tjenesten ikke er tilgjengelig, for eksempel ved at Nav-kontoret ikke fanger opp alle muntlige henvendelser som kan forstås som en søknad om tjenesten."
- **MUNICIPALITY:** Verdal kommune
- **YEAR:** 2025

FINDING 2

- **MECHANISM:** [K] COMPETENCE SUSTAINABILITY
- **DOMAIN:** Debt counseling (Økonomisk rådgivning)
- **WHAT WAS EXPECTED:** Caseworkers must formally distinguish between general administrative guidance (Forvaltningsloven § 11) and statutory financial advice (Sosialtjenesteloven § 17), issuing formal written decisions (vedtak) with strict start deadlines for every instance of the latter.
- **WHAT WAS FOUND:** Employees did not write formal decisions for simpler advice (Level 1) and failed to include formal start deadlines, primarily because they misunderstood the legal boundary between general guidance and formal advice.
- **WHY VOLUME IS THE REAL CAUSE:** Maintaining the highly specific legal-administrative skill to differentiate statutory frameworks and properly format formal decisions is unrealistic when caseworkers encounter this distinct case type fewer than 10 times annually.
- **QUOTE:** "De fleste ansatte og ledere vi snakket med, ga uttrykk for at det ikke skal skrives vedtak for rådgivning på nivå 1 (enklere økonomisk rådgivning). Det er ikke riktig... Nav-kontoret har svært få saker om økonomisk rådgivning, sammenlignet med antall saker om økonomisk sosialhjelp... Én årsak kan være at Nav-kontoret ikke alltid skriver vedtak, når kontoret gir økonomisk rådgivning eller gjeldsrådgivning."
- **MUNICIPALITY:** Verdal kommune

- **YEAR:** 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as **strong**, moderate, or weak, and state your reason.

I rate the evidence as **strong**. The report explicitly penalizes the municipality for procedural and documentation failures—specifically missing formal decisions and unregistered oral applications—while acknowledging that the actual service delivery is fast, flexible, and perceived as unproblematic by the users themselves. Because the office processes only 5 to 8 formal debt cases a year, the failures stem directly from a lack of sufficient volume to sustain the rigid bureaucratic machinery demanded by the supervisor, making this a clear sanction for scale rather than a failure of care.

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Financial assistance (social services) **WHAT WAS EXPECTED:** The municipality was expected to have formal systems and routines to explicitly document relevant knowledge about children and their specific situations in the case files. **WHAT WAS FOUND:** The caseworkers did not formally write down this information, instead relying on undocumented "tacit knowledge" because they personally knew the families and their situations well. **WHY VOLUME IS THE REAL CAUSE:** The documentation regime assumes a high-volume environment where caseworkers are siloed and handle anonymous clients, whereas in this micro-municipality, the same two caseworkers handle multiple municipal roles and already know the families personally. **QUOTE:** "Saksbehandlarane veit likevel mykje om dei fleste brukarane, fordi dei har ulike roller i Nav-kontoret. Dei kjenner familien godt, fordi dei har kontakt om ulike tenester." **MUNICIPALITY:** Vik Kommune **YEAR:** 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Financial assistance (social services) **WHAT WAS EXPECTED:** The municipality was expected to have established formal systems, routines, and scheduled case discussion meetings to ensure legally sound assessments. **WHAT WAS FOUND:** The office lacked fixed, scheduled case discussion meetings, opting instead to discuss cases informally as needed. **WHY VOLUME IS THE REAL CAUSE:** The expectation of formalized meeting structures and internal control systems assumes a larger, complex department, which is unnatural for an office where only two caseworkers process these cases and can easily coordinate informally. **QUOTE:** "Dei har ikkje faste saksdrøftingsmøte, men kan drøfte saker ved behov. Dei har planar om å begynne med faste saksdrøftingsmøte." **MUNICIPALITY:** Vik Kommune **YEAR:** 2023

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Financial assistance (social services) **WHAT WAS EXPECTED:** The municipality was expected to have systems and routines that guarantee precise, individualized written assessments for every decision,

including calculating benefits for large families. **WHAT WAS FOUND:** The caseworkers used an automatic, undocumented local rule to reduce benefits for families with more than three children, and frequently pasted standard boilerplate text into decisions without proving a customized assessment. **WHY VOLUME IS THE REAL CAUSE:** Developing and maintaining customized, repeatable procedural pipelines for rare edge cases (like large families needing social help in a town of ~2,500) is structurally impractical, leading a small staff to rely on standard texts and automated local rules. **QUOTE:** "I fleire vedtak har vi sett standardteksten «Nav Vik har i vurderinga teke omsyn til familiens storleik, barnas alder og dei individuelle behova», utan at vi kan sjå at Nav faktisk har teke omsyn til dette i vurderingane." **MUNICIPALITY:** Vik Kommune **YEAR:** 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

The evidence is **strong**. The report clearly demonstrates a micro-municipality (with only two caseworkers handling multiple service areas) being sanctioned primarily for a lack of formal documentation, systems, and routines. Despite the caseworkers having deep, multi-disciplinary tacit knowledge of the families they serve, the supervision legally faults them for failing to mirror the highly documented, formalized internal control structures required in much larger, siloed administrative offices.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The municipality must make formal, written decisions (vedtak) establishing a start date for the service as soon as a request is made, even for simpler guidance. WHAT WAS FOUND: The municipality frequently provides immediate help or simple advice but fails to draft formal legal decisions (vedtak) documenting the start dates or decisions, especially when the service is concluded quickly. WHY VOLUME IS THE REAL CAUSE: Imposing a formal administrative decision-making regime on every informal or simple counseling interaction creates disproportionate overhead for a small team of caseworkers who prioritize providing immediate practical help over paperwork. QUOTE: "Det vert ikkje alltid gjort skriftleg vedtak i saker der brukaren ønskjer økonomisk rådgjeving. Nav-kontorets system for kvalitetssikring har ikkje fanga opp at dette kan svikte, til dømes ved enklare økonomisk rådgjeving eller der rådgjevinga er avslutta før det er gjort vedtak." MUNICIPALITY: Høyanger kommune YEAR: 2024

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: debt counseling WHAT WAS EXPECTED: Needs reported via written applications must be consistently identified and followed up through a reliable system. WHAT WAS FOUND: Written applications for financial counseling are sometimes missed or not followed up on by the office. WHY VOLUME IS THE REAL CAUSE: Because written applications are rarely used in this small municipality

(oral applications are the norm), the formal procedural pipeline for processing them is practically non-existent and prone to failure when it is occasionally triggered. QUOTE: "Søknadsskjemaet for økonomisk rådgjeving er lite brukt. Det vanlege er munnleg søknad... Vi har ved gjennomgang av klientsaker sett at behov meldt i skriftleg søknad ikkje alltid vert følgt opp." MUNICIPALITY: Høyanger kommune YEAR: 2024

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: Continuous, separate documentation of all counseling activities, including informal advice, follow-up calls, and SMS interactions, to ensure they are verifiable. WHAT WAS FOUND: Counseling is sometimes baked into general financial aid decisions rather than documented separately, journal notes are delayed, and SMS interactions are not logged at all. WHY VOLUME IS THE REAL CAUSE: The rigorous expectation to formally journal every minor interaction (like SMS) assumes dedicated administrative capacity, whereas these generalist caseworkers handle all interactions fluidly as part of a continuous dialogue. QUOTE: "Rettleiing som er ytt etter § 17 vert av og til dokumentert i vedtak om stønad etter § 18. Ikkje all rettleiing vert dokumentert, og det er ikkje alltid notat etter samtalar... og sms'ar vert ikkje journalførte." MUNICIPALITY: Høyanger kommune YEAR: 2024

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: debt counseling WHAT WAS EXPECTED: A formal internal control and quality assurance system capable of proactively catching individual case errors, such as missed written applications or undocumented simpler advice. WHAT WAS FOUND: The office's quality assurance system failed to catch several specific operational failures. WHY VOLUME IS THE REAL CAUSE: The municipality's QA system consists of a 9-person office discussing deviations at weekly meetings and the leader spot-checking cases; they lack the structural complexity and dedicated compliance units expected by the supervision standard to audit cases continuously. QUOTE: "Nav-kontorets system for kvalitetssikring har ikkje fanga opp at dette kan svikte, til dømes når behovet er meldt ved skriftleg søknad." MUNICIPALITY: Høyanger kommune YEAR: 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Yes, the evidence is **strong**. The report explicitly details a small office of 9 employees that actually delivers flexible, immediate help—often starting the service before a formal decision is even made. They are ultimately sanctioned for failing to map their agile, conversational practice onto a rigid bureaucratic framework, such as missing formal decisions for simple advice, failing to journal SMS messages, and missing rare written applications because their normal routine relies heavily on direct, oral communication.

Here are the findings extracted from the supervision report that demonstrate mechanisms of scale-related structural challenges, formatted according to your instructions.

FINDING 1

- **MECHANISM:** [P] PROCEDURAL CONTINUITY
- **DOMAIN:** Financial advice (økonomisk rådgjeving)
- **WHAT WAS EXPECTED:** The municipality must make a formal, written administrative decision (vedtak) whenever a user requests financial advice.
- **WHAT WAS FOUND:** The office frequently provided the financial advice directly to the user without generating a formal written decision.
- **WHY VOLUME IS THE REAL CAUSE:** With an extremely low volume of formal cases—only eight formal decisions in the entire previous year—the bureaucratic pipeline for converting informal counseling into statutory written decisions cannot function as an established, repeatable routine.
- **QUOTE:** "Det vert gjort skriftleg vedtak om tenesta økonomisk rådgjeving, men vi har også høyrt at mykje rådgjeving skjer utan at det vert gjort vedtak. Leiinga er kjent med dette. Kontoret har ikkje mange vedtak, berre åtte i fjor."
- **MUNICIPALITY:** Sogndal
- **YEAR:** 2024

FINDING 2

- **MECHANISM:** [K] COMPETENCE SUSTAINABILITY
- **DOMAIN:** Financial advice (økonomisk rådgjeving)
- **WHAT WAS EXPECTED:** Written decisions must contain a legally reasoned justification for the chosen start date, based on an assessment of the user's needs and the urgency of the case.
- **WHAT WAS FOUND:** The written decisions lacked any formal justification for why specific start dates were chosen.
- **WHY VOLUME IS THE REAL CAUSE:** The granular legal competence required to remember and include specific statutory elements in a formal document cannot realistically be maintained through practice when caseworkers draft fewer than ten of these specific decisions annually.
- **QUOTE:** "Skriftlege vedtak om økonomisk rådgjeving inneheld ikkje grunngjeving for val av dato for oppstart. Årsaka er truleg at det ikkje har vore merksemd på dette kravet."
- **MUNICIPALITY:** Sogndal
- **YEAR:** 2024

FINDING 3

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** Financial advice (økonomisk rådgjeving)
- **WHAT WAS EXPECTED:** Continuous, verifiable documentation of all ongoing counseling sessions, detailing what information emerged, what evaluations were made, and what was agreed upon with the user.

- **WHAT WAS FOUND:** Caseworkers failed to systematically write notes after counseling conversations, leaving the interactions and ongoing guidance undocumented.
- **WHY VOLUME IS THE REAL CAUSE:** The strict regime of meticulously logging every detail of ongoing guidance imposes an unsustainable administrative burden on a small group of frontline generalists already experiencing high work pressure, lacking the back-office support such a regime assumes.
- **QUOTE:** "Det er ikkje alltid notat etter samtalar eller annan dokumentasjon som viser kontakt, opplysningar, vurderingar, eller kva som er avtalt med brukaren frå gong til gong."
- **MUNICIPALITY:** Sogndal
- **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? **I rate the evidence as strong.**

The report explicitly acknowledges that the municipality successfully identifies users' needs, provides appropriate levels of advice, and almost always starts the service immediately without delay. The sanctions imposed are entirely administrative—failing to write formal decisions, omitting start-date justifications, and lacking comprehensive session logs—which are classic documentation and procedural pipelines that break down in small offices handling a very low volume of formal cases (only eight last year) under high daily pressure.

Based on the supervision report for Sveio municipality, here are the findings where structural scale mechanisms are visible as the underlying cause for the identified failures.

MECHANISM: [S] SPECIALIZATION DOMAIN: debt counseling WHAT WAS EXPECTED: The Nav office was expected to have a robust system for processing decisions and handling complex economic advice cases without being vulnerable to staffing limitations. WHAT WAS FOUND: At the time of the inspection, only one single caseworker was responsible for making the formal decisions for users needing follow-up and handling complex level 3 cases, which the supervisor explicitly deemed a vulnerability. WHY VOLUME IS THE REAL CAUSE: A small office with only 10.3 municipal full-time equivalents simply lacks the case volume and staffing size to sustain multiple redundant specialists for high-level debt counseling. QUOTE: "Leiinga i Nav-kontoret er merksam på utfordringane det kan vere for eit lite kontor å levere kvalitet og vere spesialistar. Under tilsynet vart dette trekt fram som ein mogleg risikofaktor for svikt." MUNICIPALITY: Sveio kommune YEAR: 2025

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The municipality must systematically document all oral applications, include exact start dates and justifications in written decisions, and maintain detailed journal notes

showing continuous assessments for every consultation. WHAT WAS FOUND: While the caseworkers successfully provided the actual counseling with no waiting lists, they failed to formalize oral applications, omitted formal start dates in written decisions, and struggled to keep sufficiently detailed written journal notes of their ongoing assessments. WHY VOLUME IS THE REAL CAUSE: The rigorous, standardized documentation regime imposes a heavy administrative burden that falls disproportionately on a few frontline generalists who lack the back-office support found in larger organizations. QUOTE: "Vi har ved intervju fått vite av Nav Sveio truleg yter meir økonomisk rådgjeving enn det vi ser i dokumentasjonen, at leiinga ser det er manglar i dokumentasjonen, og vurderer at dei kan bli betre på å dokumentere og at kontrollen med dette kan bli betre." MUNICIPALITY: Sveio kommune YEAR: 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Strong evidence. The report explicitly acknowledges the municipality's small scale (serving ~5,750 inhabitants with ~10 municipal FTEs) as an inherent challenge for specialization, resulting in a single caseworker handling complex decisions. Furthermore, the actual delivery of the service appears highly effective—with zero waiting times, flexible meeting locations, and proactive follow-up—yet the municipality is sanctioned almost entirely because its frontline workers fail to maintain the rigorous, high-volume administrative documentation and formalization standards expected by the state.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance (assessment of children's needs) WHAT WAS EXPECTED: The supervisor expected extensive, systematic written documentation of the mapping of children's needs and individual assessments in every case file and decision. WHAT WAS FOUND: The municipality failed to systematically log all details in the case files, relying instead on the caseworkers' intimate, long-term knowledge of the families and oral discussions with approvers. WHY VOLUME IS THE REAL CAUSE: In small municipalities with only 38 and 61 children receiving assistance respectively, caseworkers know the families personally and communicate informally with approvers, making heavy bureaucratic documentation feel redundant locally but resulting in a formal legal violation. QUOTE: "Drøftingsmøter og samtaler med den som skal godkjenne vedtakene i saksbehandlingen, gir grunn til å tro at en del av opplysningene som ikke journalføres også er kjent for den som godkjenner vedtakene. Flere av familiene har også hatt den samme veilederen over flere år. Veilederne opplyser at de kjenner familiene godt. Kravet til forvaltningen er likevel at opplysningene må skrives i journal eller vedtak." MUNICIPALITY: Nav Skiptvet Marker (Skiptvet and Marker) YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Internal Control / Quality Assurance WHAT WAS EXPECTED: The management was expected to have formal routines for checking decisions, systematic reviews of decisions, and formal reporting pipelines to catch recurring errors. WHAT WAS FOUND: The office lacked systematic, formalized reviews and reporting, instead relying on weekly team meetings to ensure equal practice and a "low threshold" for giving oral feedback between colleagues. WHY VOLUME IS THE REAL CAUSE: A 5-person social team operating in a shared office coordinates effectively through daily informal chats and weekly meetings, lacking the scale and internal complexity to justify a formalized, multi-tiered quality-control reporting apparatus. QUOTE: "Nav Skiptvet Marker har heller ikke systematiske gjennomganger av vedtak eller rapportering som kan sikre at ledelsen fanger opp gjentatte feil. Kommunens avvikssystem er ikke brukt til å melde faglige feil. Sakene drøftes i møter for å sikre lik praksis. [...] De ansatte opplyser om at de gir muntlige tilbakemeldinger om feil, og at det er lav terskel for å gi slike tilbakemeldinger." MUNICIPALITY: Nav Skiptvet Marker (Skiptvet and Marker) YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance / Refugee services WHAT WAS EXPECTED: NAV was expected to document the specific mapping of needs for newly arrived refugees within its own case management system when granting supplementary financial aid. WHAT WAS FOUND: NAV granted aid based on needs mapped by the municipal refugee service but failed to duplicate this documentation into NAV's own system. WHY VOLUME IS THE REAL CAUSE: In a small administration, caseworkers collaborate directly with the local refugee service to solve the user's problem, lacking the administrative capacity or need to redundantly copy files between the systems of small, tightly knit municipal departments. QUOTE: "I to saker er det innvilget stønad til nyankomne flyktninger, kartleggingen av behovet er ikke dokumentert i saksbehandlingssystemet i Nav. [...] Her har vi fått opplyst at opplysningene om familiene er dokumentert i flyktningetjenesten." MUNICIPALITY: Nav Skiptvet Marker (Skiptvet and Marker) YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: Financial counseling / Advice and guidance (§ 17) WHAT WAS EXPECTED: The municipality was expected to make formal administrative decisions (vedtak) regarding the provision of advice and guidance under § 17 across all areas of social work. WHAT WAS FOUND: Formal decisions on advice and guidance were only systematically made by the specialized "debt team" (team gjeld), while general caseworkers just provided advice informally as part of regular financial processing without making separate formal decisions for it. WHY VOLUME IS THE REAL CAUSE: Generalist caseworkers blend advice naturally into their overall handling of the few cases they have, whereas the formal separation of "advice" into a distinct track with its own formal decisions mimics a highly specialized organizational structure. QUOTE: "Det er fattet vedtak etter § 17 for 8 brukere i sakene vi har gått gjennom som mottar økonomisk rådgivning fra team gjeld. Vi finner ikke at det er fattet vedtak om rådgivning på andre områder eller når veiledningen gjelder enklere økonomisk rådgivning i vår gjennomgang." MUNICIPALITY: Nav Skiptvet Marker (Skiptvet and Marker) YEAR: 2023

CLOSING FLAG Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? **The evidence is strong.** The report explicitly acknowledges that caseworkers know the families well, hold frequent conversations, uncover unstated needs, and maintain excellent accessibility. However, the municipalities are ultimately sanctioned because these highly effective, scale-appropriate informal practices are not translated into the rigorous written documentation and formal internal control pipelines expected of a much larger bureaucracy.

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Complaint handling (financial social assistance) WHAT WAS EXPECTED: Sending out preliminary responses (foreløpig svar) to inform users of the expected processing time when a complaint takes more than one month to process. WHAT WAS FOUND: The municipality did not consistently send these required preliminary notices, failing to do so in 3 out of the 6 cases where it was required. WHY VOLUME IS THE REAL CAUSE: With a total volume of only 7 complaint cases over a 13-month period, the office lacks the routine frequency necessary to sustain a reliable, ingrained administrative pipeline for tracking and sending standardized delay notifications. QUOTE: "Vi ser av mappegjennomgangen at foreløpig svar er sendt ut i liten grad. Vi vurderer at foreløpig svar er viktig i slike saker... Statsforvalteren vurderer det er enkelte forbedringspunkter knyttet til klagesaksbehandlingen". MUNICIPALITY: Nav Våler YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: Complaint handling (financial social assistance) WHAT WAS EXPECTED: Ensuring legally sound case processing and correct application of the legal framework for social services. WHAT WAS FOUND: Prior to spring 2023, an internal review found significant deficiencies and errors in the application of the law, driven by a lack of specialized competence and a small professional environment. WHY VOLUME IS THE REAL CAUSE: With only around 100 total social assistance recipients annually and minimal complaint cases, the municipality structurally struggled to maintain deep legal expertise without establishing a dedicated specialist role and joining an inter-municipal network. QUOTE: "En utfordring som påpekes i intervjuet er at det er et lite fagmiljø og få ansatte på Nav Våler... fagkoordinatorstillingen ble opprettet på bakgrunn av at det i saksbehandlingen ble oppdaget store mangler og feil ved anvendelse av lovverket." MUNICIPALITY: Nav Våler YEAR: 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as **weak**, and state your reason.

Rating: Weak The State Administrator explicitly concluded that there were zero violations in this inspection and issued no sanctions against the municipality. While the report clearly documents how the municipality's small scale (handling only 7 complaints in 13 months)

previously led to quality issues and minor procedural misses, the supervisor accepted their compensatory measures—such as creating an inter-municipal coordinator group to offset their "small professional environment"—rather than holding them to an impossible structural standard.

Here are the findings extracted from the supervision report that demonstrate mechanisms of scale-related structural challenges:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: financial assistance / follow-up WHAT WAS EXPECTED: The Nav office was expected to issue formal administrative decisions (enkeltvedtak) under § 17 for any information, advice, and guidance provided to families. WHAT WAS FOUND: Frontline workers closely followed up with families, especially newly settled refugees, but rarely formalized this practical guidance into official § 17 administrative decisions. WHY VOLUME IS THE REAL CAUSE: The requirement to translate ongoing, practical social work and guidance into formal administrative legal documents assumes a dedicated back-office capacity that stretched frontline workers lack. QUOTE: "I team Jobb og integrering fattes det generelt ikke vedtak etter § 17, de opplyser at de er tett på brukerne i bosettingsfasen og det er ikke klart for dem når det skal fattes vedtak." MUNICIPALITY: Randaberg Municipality YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: financial assistance / mapping WHAT WAS EXPECTED: The municipality was expected to systematically document all relevant information about each child's needs in the electronic journal system and regularly use formal mapping forms. WHAT WAS FOUND: Caseworkers gathered knowledge about the families through close contact and home visits, but failed to systematically document this knowledge in formal journals or fully utilize the standard forms. WHY VOLUME IS THE REAL CAUSE: This rigorous documentation regime disproportionately burdens frontline staff who rely on direct, informal knowledge of their users to get through high caseloads, rather than extensive bureaucratic record-keeping. QUOTE: "Videre opplyses det at kjennskapen de har til familien ikke systematisk skrives i journal, og at dette er et forbedringsområde." MUNICIPALITY: Randaberg Municipality YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: internal control / quality assurance WHAT WAS EXPECTED: Management was expected to have formalized internal control measures, systematic spot checks, and structured cross-team meetings to ensure uniform practice across different departments. WHAT WAS FOUND: Practices diverged between teams, there were no fixed cross-team alignment meetings, and management relied on informal updates rather than systematic bureaucratic spot checks. WHY VOLUME IS THE REAL CAUSE: The expectation of formal, multi-layered quality control systems and cross-departmental alignment committees assumes an organizational complexity and administrative overhead that is unnatural for smaller, flatter office structures. QUOTE: "Videre opplyses at ledelsen ikke gjennomfører stikkprøver på området. Nav-leder følger

med på området gjennom den informasjonen han får fra faglederne." MUNICIPALITY: Randaberg Municipality YEAR: 2023

MECHANISM: [S] SPECIALIZATION DOMAIN: financial assistance / child perspective WHAT WAS EXPECTED: The office should maintain a dedicated focus and structured responsibility for safeguarding the child perspective across the organization. WHAT WAS FOUND: No specific individual in the office was assigned special responsibility for the child perspective, such as managing training or coordinating with child welfare services. WHY VOLUME IS THE REAL CAUSE: Assigning a dedicated specialist role for a thematic area requires a sufficient baseline volume of cases to justify pulling a generalist away from broader frontline production. QUOTE: "Det opplyses at ingen i kontoret er gitt et særskilt ansvar for barneperspektivet i Nav-kontoret, for eksempel i forhold til opplæring av de ansatte, samarbeid med barneverntjenesten, eller å holde søkelys på området." MUNICIPALITY: Randaberg Municipality YEAR: 2023

CLOSING FLAG

This report provides **moderate** evidence of a municipality being sanctioned for structural scale problems rather than purely poor practice. While Randaberg is not a micro-municipality, it experienced a sudden doubling of social assistance cases and a massive influx of refugees, forcing its generalist frontline workers to prioritize practical, hands-on user contact over heavy administrative documentation. The supervisor's findings heavily penalize the lack of formal journaling, cross-team bureaucratic alignment, and formal legal decisions for informal guidance, reflecting a clash between an expected back-office bureaucratic infrastructure and the reality of a stretched, flat organization managing a volume surge.

Here is the analysis of the supervision report based on the six mechanisms:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The Nav office was required to produce formal, written administrative decisions (vedtak) for all levels of economic advice—including low-level help like setting up a budget or adjusting tax deductions—and formal "stop" decisions when users failed to attend appointments. WHAT WAS FOUND: Caseworkers successfully provided the low-level financial advice during conversations, but failed to write the required formal decisions for it, reserving the heavy administrative paperwork only for complex cases that were escalated to the office's part-time debt specialist. They also failed to produce formal decisions to close inactive cases. WHY VOLUME IS THE REAL CAUSE: The strict legal requirement assumes a bureaucratic pipeline where every minor interaction must be formalized into a documented administrative case, imposing a disproportionate documentation burden on frontline generalists who organically resolve simple issues on the spot in a small office. QUOTE: "Med unntak av to saker den siste måneden før besøket, så vi at Nav-kontoret ikke fattet

vedtak i saker der økonomisk rådgivning gis på tiltaksnivå en og to, f.eks. når de bistår bruker med å sette opp budsjett... det var ikke praksis i kontoret for å gjøre dette." MUNICIPALITY: Balsfjord (Nav Balsfjord-Storfjord) YEAR: 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? The evidence for structural scale problems in this report is **weak**. While the failure to generate formal paperwork for minor, everyday advice loosely points to a documentation burden ([D]), the caseworkers explicitly admitted they knew the rules but simply had a local practice of ignoring them. Furthermore, the office rapidly corrected the issue within a few months by establishing internal routines and drafting the required documents, proving that the failure stemmed from poor administrative habits rather than a genuine, structural inability to handle the workload.

Here are the findings from the supervision report that demonstrate structural scale problems, mapped to the requested mechanisms.

MECHANISM: [S] SPECIALIZATION **DOMAIN:** Debt counseling / Economic advice **WHAT WAS EXPECTED:** The municipality must provide competent, uniform economic counseling, systematically identifying needs and providing information to all relevant users. **WHAT WAS FOUND:** There was no shared understanding of what the service entails, varying competence among staff, and unequal practices where some users missed out on information. **WHY VOLUME IS THE REAL CAUSE:** The caseworkers operate as total generalists covering all state and municipal tasks across the office, making it structurally impossible to sustain deep, uniform specialist expertise in a specific area like economic counseling when they only process a handful of cases. **QUOTE:** "De ansatte jobber som generalister noe som innebærer at hver enkelt veileder følger opp brukerne helhetlig på tvers av kommunalt og statlige oppdrag.", paired with "Det fremkommer samtidig at det er varierende kompetanse på fagområdet blant de ansatte. Det er ulik praksis mellom veilederne for hvor mye økonomisk rådgivning den enkelte veilederen gir..." **MUNICIPALITY:** Salangen (host for Lavangen and Dyrøy) **YEAR:** 2024/2025

MECHANISM: [D] DOCUMENTATION APPARATUS **DOMAIN:** Debt counseling / Economic advice **WHAT WAS EXPECTED:** Continuous, systematic documentation of user situations, special expenses for children, health issues, and all follow-up interactions. **WHAT WAS FOUND:** Little systematic journal keeping, despite the fact that caseworkers actually possessed the information about the users. **WHY VOLUME IS THE REAL CAUSE:** In a small-scale, generalist office where workers know their users personally, the heavy administrative burden of exhaustively formalising every detail in the system falls disproportionately on frontline staff, leading to a reliance on tacit knowledge rather than the required documentation apparatus. **QUOTE:** "Mappegjennomgangen viste også manglende

systematisk journalføring i oppfølgingsarbeidet... Derimot ble det oppgitt at veilederne visste mer om brukernes situasjon enn det som kom fram av journalene." **MUNICIPALITY:** Salangen (host for Lavangen and Dyrøy) **YEAR:** 2024/2025

MECHANISM: [P] PROCEDURAL CONTINUITY **DOMAIN:** Debt counseling / Economic advice **WHAT WAS EXPECTED:** Formal administrative decisions (vedtak) must be formulated in writing for all levels of economic advice, allowing for legal review and appeals. **WHAT WAS FOUND:** The office bypassed the formal pipeline for low-threshold advice, only writing formal decisions for complex cases that needed to be sent to an external specialist centre. **WHY VOLUME IS THE REAL CAUSE:** The requirement assumes a high-volume, repeatable administrative pipeline for processing legal decisions, which is disconnected from the reality of a small office where generalists organically provide low-threshold advice during regular consultations without triggering a cumbersome bureaucratic procedure. **QUOTE:** "Med unntak av et par saker de siste månedene før besøket, så vi at Nav-kontoret ikke fattet vedtak i saker der økonomisk rådgivning gis på de laveste tiltaksnivåene... Det har inntil nylig vært praksis i kontoret at vedtak etter sosialtjenesteloven § 17 først blir fattet i saker som er så komplekse at de skal følges opp av Kompetansesenteret." **MUNICIPALITY:** Salangen (host for Lavangen and Dyrøy) **YEAR:** 2024/2025

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Debt counseling / Economic advice **WHAT WAS EXPECTED:** Management and internal systems must actively track cases, monitor legal deadlines, and oversee waiting times to ensure compliance. **WHAT WAS FOUND:** There were no management systems or routines to track deadlines or monitor waiting times; all responsibility was delegated to the frontline workers. **WHY VOLUME IS THE REAL CAUSE:** The municipality lacks the internal administrative complexity (such as dedicated compliance officers or quality controllers) required to run these tracking systems, leaving the frontline generalist responsible for both operations and compliance. **QUOTE:** "Nav-kontoret har ingen rutine eller praksis som sikrer at frister for oppstart av tjenesten overholdes... Det er opp til den enkelte veileder ved Nav-kontoret å følge med på at brukerne i egen portefølje får tjenesten innen rimelig tid..." **MUNICIPALITY:** Salangen (host for Lavangen and Dyrøy) **YEAR:** 2024/2025

MECHANISM: [C] COORDINATION INFRASTRUCTURE **DOMAIN:** Debt counseling / Economic advice **WHAT WAS EXPECTED:** Seamless follow-up and continuity of service after outsourced complex debt cases are returned from the external Competence Center. **WHAT WAS FOUND:** The office failed to contact users systematically once the external center finished processing their cases, leaving users to initiate contact themselves. **WHY VOLUME IS THE REAL CAUSE:** Because of its small scale, the municipality must outsource complex cases to an inter-municipal specialist, but it lacks the internal coordination infrastructure to smoothly catch, track, and reintegrate those cases when they are handed back to the local generalist. **QUOTE:** "Vi så også at det ikke var systematisk oppfølging av brukerne etter at Kompetansesenteret var ferdig med saken. Det var ikke

praksis for å kontakte bruker og avtale veien videre." **MUNICIPALITY:** Salangen (host for Lavangen and Dyrøy) **YEAR:** 2024/2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Yes. I rate the evidence as **strong**. The report clearly depicts a small inter-municipal office relying on frontline generalists who organically know their users but lack the volume to sustain specialized legal pipelines or complex tracking structures. The "failures" identified—such as bypassing formal legal decisions for low-threshold advice, relying on tacit knowledge over written journals, and struggling to coordinate hand-offs with an external specialist center—are direct symptoms of applying heavy bureaucratic expectations to a micro-scale operational reality.

Here is the analysis of the supervision report for Årdal Municipality, extracting the findings where structural scale problems are the underlying cause of the sanctions.

EXTRACTED FINDINGS

Finding 1

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** debt counseling
- **WHAT WAS EXPECTED:** The supervisor required the municipality to meticulously document what specific information is given about the service, what is done to motivate users to accept help, and the exact dates when oral applications are made.
- **WHAT WAS FOUND:** The municipality identifies needs dynamically through conversation and knows the users well, but fails to formally log these continuous micro-interactions and oral requests in the casework system.
- **WHY VOLUME IS THE REAL CAUSE:** A small office where employees know their users handles cases fluidly through direct contact, lacking the administrative capacity—and the operational need—to maintain a rigid, bureaucratic tracking system for every conversation.
- **QUOTE:** "På bakgrunn av det som er opplyst om korleis dei tilsette utfører arbeidet, og Nav-leiarens oversikt over dette, vurderer vi likevel at manglande dokumentasjon og system for kontroll med denne delen av arbeidet ikkje medfører særleg stor risiko... Manglande dokumentasjon av tenesteytinga er ikkje i tråd med gjeldande dokumentasjonskrav."
- **MUNICIPALITY:** Årdal kommune
- **YEAR:** 2025

Finding 2

- **MECHANISM:** [P] PROCEDURAL CONTINUITY
- **DOMAIN:** debt counseling
- **WHAT WAS EXPECTED:** A formal procedural pipeline where the office assesses the urgency of the case, sets a deadline for startup, and issues a formal written decision (vedtak) documenting this timeline before or as the service starts.
- **WHAT WAS FOUND:** The municipality frequently helps people "there and then" without any wait times, completely bypassing the formal pipeline of writing urgency assessments, setting startup deadlines, or issuing proactive formal decisions.
- **WHY VOLUME IS THE REAL CAUSE:** The bureaucratic pipeline of application-assessment-deadline-decision assumes high-volume queuing and prioritization, which is structurally redundant in a small municipality capable of providing immediate help.
- **QUOTE:** "På bakgrunn av det som er opplyst om korleis tenesta vert ytt straks behovet vert fanga opp, og at det ikkje er ventetid på tenesta, vurderer vi at manglande opplysningar om frist og grunngjeving for fristen, og mogleg manglande vedtak, ikkje medfører særleg stor risiko... Manglande dokumentasjon av frist for oppstart og grunngjeving for fristen er ikkje i tråd med gjeldande dokumentasjonskrav."
- **MUNICIPALITY:** Årdal kommune
- **YEAR:** 2025

Finding 3

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** debt counseling
- **WHAT WAS EXPECTED:** Rigorous journal notes detailing the ongoing mapping of the user's situation during follow-up, specifically proving that evaluations of children's needs and other life circumstances took place.
- **WHAT WAS FOUND:** Caseworkers actively focus on these needs (e.g., asking about what children need) during their conversations, but fail to maintain a rigorous written trail of these verbal assessments in the system.
- **WHY VOLUME IS THE REAL CAUSE:** Frontline generalists in a small office heavily prioritize direct client interaction and lack the dedicated back-office support to exhaustively journal every detail of an ongoing, familiar dialogue.
- **QUOTE:** "På bakgrunn av det vi har fått vite ved intervju, legg vi til grunn at utgifter til barn vert kartlagde, men at dette ikkje alltid vert dokumentert."
- **MUNICIPALITY:** Årdal kommune
- **YEAR:** 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as strong, moderate, or weak, and state your reason.

Strong. The supervisor repeatedly acknowledges that the actual practice is highly effective: the municipality has no waiting times, provides help immediately, knows its users intimately, and verbally maps complex needs like children's expenses. The legal sanctions applied to Årdal are entirely a result of this small-scale, fluid approach failing to produce the heavy bureaucratic documentation and formal procedural queuing steps (like documenting urgency and setting deadlines) demanded of larger, high-volume organizations.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Debt counseling (økonomisk rådgjeving) WHAT WAS EXPECTED: The supervisor expected the municipality to conduct regular internal control, including taking annual spot checks of case files and actively monitoring service quality through their deviation system (Riskmanager) to catch delays in starting services. WHAT WAS FOUND: The municipality failed to set formal deadlines for starting the service, had not conducted any internal control spot checks in the last two years, and did not use their deviation system to track the quality of the services provided. WHY VOLUME IS THE REAL CAUSE: The requirement imposes a continuous quality-auditing and documentation regime that assumes a dedicated administrative buffer, which a small 14-person office lacks when forced to triage acute frontline crises and high refugee influxes. QUOTE: "Den svært krevjande ressurssituasjon ved NAV-kontoret, som fører til at leiinga har prioritert dei mest akutte tenestene, og nedprioritert internkontroll." MUNICIPALITY: Vestnes YEAR: 2024

CLOSING FLAG

Rate: **Moderate**.

This report shows a municipality being sanctioned for administrative and formal shortcomings (not writing deadlines in decisions and abandoning internal audits) rather than actual poor practice, as the users interviewed reported receiving good, comprehensive help. The evidence points to a structural scale problem: a small 14-person office hit with severe staffing challenges and a sudden influx of 300 refugees was forced to abandon back-office documentation and compliance regimes simply to keep acute frontline services functioning.

Here are the findings from the supervision report where the failures are structurally linked to the municipality's scale and case volume, based on the requested mechanisms:

FINDING 1

- **MECHANISM:** [K] COMPETENCE SUSTAINABILITY
- **DOMAIN:** debt counseling (økonomisk rådgivning)

- **WHAT WAS EXPECTED:** Caseworkers should know the legal threshold for when providing financial advice and guidance requires them to generate a formal written decision (vedtak) under § 17 of the Social Services Act.
- **WHAT WAS FOUND:** Caseworkers provide informal financial advice and counseling to users, but generalist staff do not know when to formally trigger a decision; formal decisions are almost exclusively made only when cases become severe enough to be handed over to the office's sole debt specialist.
- **WHY VOLUME IS THE REAL CAUSE:** With a total of only 27 formal decisions made across the entire office over nearly four years, front-line generalists simply do not encounter this specific administrative threshold frequently enough to maintain the procedural competence required to distinguish informal guidance from a statutory decision.
- **QUOTE:** "Det er flere ansatte som ikke vet når det er riktig å fatte vedtak om råd og veiledning etter § 17... vedtak etter sosialtjenesteloven § 17 først blir fattet når sakene har blitt så alvorlig at gjeldsrådgiver ved Nav-kontoret overtar saken".
- **MUNICIPALITY:** Målselv kommune (Nav Målselv-Bardu)
- **YEAR:** 2024

FINDING 2

- **MECHANISM:** [D] DOCUMENTATION APPARATUS
- **DOMAIN:** debt counseling (økonomisk rådgivning)
- **WHAT WAS EXPECTED:** Meticulous and systematic journaling of all user interactions, financial mapping, and follow-up activities to ensure traceability and continuity of the service.
- **WHAT WAS FOUND:** Widespread lack of systematic journal entries regarding the follow-up work, even though the caseworkers actually knew the users' situations well and users were largely satisfied with the help they received.
- **WHY VOLUME IS THE REAL CAUSE:** The rigorous documentation regime assumes a large, fragmented bureaucracy where service continuity relies on written records, whereas caseworkers in this small office clearly rely on direct, continuous personal knowledge of their clients to deliver the service.
- **QUOTE:** "Mappegjennomgangen viste manglende systematisk journalføring i oppfølgingsarbeidet. [...] Derimot ble det oppgitt at veilederne visste mer om brukernes situasjon enn det som kom fram av journalene.".
- **MUNICIPALITY:** Målselv kommune (Nav Målselv-Bardu)
- **YEAR:** 2024

FINDING 3

- **MECHANISM:** [P] PROCEDURAL CONTINUITY
- **DOMAIN:** debt counseling (økonomisk rådgivning)
- **WHAT WAS EXPECTED:** The municipality must have a dedicated internal control system and specific risk and vulnerability analyses targeting the financial counseling service to prevent failures.
- **WHAT WAS FOUND:** While the office regularly conducts risk analyses and discusses operational risks naturally in their general staff meetings, they had not

generated a separate, formalized risk analysis specifically isolated to the financial counseling service.
- **WHY VOLUME IS THE REAL CAUSE:** The requirement demands a specialized, repeatable pipeline of administrative control and formal risk analysis for a sub-service that generates an average of fewer than seven formal decisions a year across the entire municipality.
- **QUOTE:** "I egenrapporteringen vises det til at det er rutiner for jevnlig risikoanalyser og at dette er naturlig tema i møter i Nav-kontoret. [...] Det er ikke gjort en risiko- og sårbarhetsanalyse for tjenesten økonomisk rådgivning.".
- **MUNICIPALITY:** Målselv kommune (Nav Målselv-Bardu)
- **YEAR:** 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice?

Rating: Strong. The report explicitly acknowledges that caseworkers are actively providing financial advice at lower levels, that they know their users' situations intimately, and that the users themselves are largely satisfied with the help they receive. The municipality is being sanctioned entirely for failing to translate this functional, informal practice into the heavy bureaucratic formats expected by the state (formal decisions, systematic journaling, isolated risk analyses)—administrative standards that are structurally artificial for an office handling only 27 formal cases over a four-year period.

Here are the extracted findings from the supervision report that trigger the specified mechanisms:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The supervisor required the municipality to issue formal, written legal decisions (vedtak) for financial advice, which must explicitly state a deadline for starting the service. WHAT WAS FOUND: The municipality successfully provided the actual service on time based on urgency, but often failed to formulate a formal legal decision for simpler advice, omitted the written deadline, or drafted the decision document only after the help had already started. WHY VOLUME IS THE REAL CAUSE: The requirement enforces a rigid, step-by-step administrative pipeline (application -> formal decision -> action) that acts as disproportionate bureaucratic overhead for generalist caseworkers who prioritize immediate, informal problem-solving. QUOTE: "I flere saker er tjenesten startet før vedtaksdato eller uten at oppstartstidspunkt fremgår av vedtaket. Dette innebærer at selv om formelle krav til frist i vedtaket ikke alltid oppfylles, sikrer praksis at tjenesten igangsettes tidsnok ut fra hvor mye det haster." MUNICIPALITY: Sunndal (Nav Indre Nordmøre) YEAR: 2025

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: debt counseling WHAT WAS EXPECTED: The supervisor required the municipality to continuously document and journal all relevant case information to ensure traceability, specifically including electronic communication with users. WHAT WAS FOUND: Caseworkers frequently communicated with users via SMS but did not consistently transfer and manually log these text messages into the official casework system (Socio). WHY VOLUME IS THE REAL CAUSE: The strict legal requirement to manually archive every informal electronic interaction imposes a continuous back-office data-entry burden on frontline social workers who lack dedicated administrative support. QUOTE: "Tilsynet har avdekket at informasjon fra kommunikasjon med brukere på SMS, ikke alltid blir journalført i Socio." MUNICIPALITY: Sunndal (Nav Indre Nordmøre) YEAR: 2025

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as weak.

Reason: While the municipality is explicitly sanctioned for paperwork and compliance failures despite providing high-quality, timely service in practice, this is not strictly a *scale* problem. Nav Indre Nordmøre is an inter-municipal collaboration spanning three municipalities with 28 full-time employees, which gives them enough organizational scale to maintain specialized roles, including a dedicated debt counselor. The sanctions reflect a classic bureaucratic disconnect where frontline workers prioritize immediate action over heavy administrative logging requirements (such as drafting formal decisions for minor advice or journaling SMS messages), rather than an office that is fundamentally too small to function.

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance (mapping of children's needs) WHAT WAS EXPECTED: The municipality was expected to systematically map children's needs and document these individual assessments in writing in the case files and formal decisions. WHAT WAS FOUND: Caseworkers gathered information orally and understood the children's situations, but failed to document this knowledge systematically in writing or include individualized justifications in formal decisions. WHY VOLUME IS THE REAL CAUSE: In a small-scale, inter-municipal setup where caseworkers personally know the users and their life situations, informal and oral communication naturally replaces the rigid, formalized documentation apparatus expected by state supervisors. QUOTE: "Ved intervju med ansatte fikk vi informasjon om at de har mye muntlig informasjon om barna/familien, men vi fant ikke noe skriftlig om dette." MUNICIPALITY: Vennesla Municipality / Nav Midt-Agder YEAR: 2023

CLOSING FLAG

This report shows a municipality being sanctioned primarily for structural scale problems rather than actual poor practice, and the evidence for this is **strong**. The report explicitly notes that the caseworkers are "well acquainted with the users and their life situation" and the users themselves reported highly positive experiences, emphasizing that the caseworkers asked good questions and showed genuine interest in their children. The municipality was sanctioned purely because its informal, low-volume operational reality did not translate into the systematic, formalized paper trail required by the state's documentation regime.

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Internal control / Quality assurance WHAT WAS EXPECTED: The municipality was expected to conduct regular, scheduled internal reviews of social cases (one case per caseworker per month) to systematically detect errors and improve competence. WHAT WAS FOUND: The internal control routine was completely halted and not carried out as planned. WHY VOLUME IS THE REAL CAUSE: A small office with only three social services caseworkers lacks the buffering capacity to absorb external shocks, meaning a single operational event (the Ukrainian refugee influx) consumed all available slack and collapsed the formalized administrative pipeline. QUOTE: "Det opplyses under tilsynsbesøket at nevnte internkontroll ikke er blitt gjennomført etter intensjonen. Årsaken tilskrives den krevende situasjonen kommunen har stått i det siste året, knyttet til mottak og etablering av ukrainske flyktninger." MUNICIPALITY: Søndre Land YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Social services / Case processing WHAT WAS EXPECTED: Structured, regular inter-team discussion meetings with formal agendas, written meeting minutes, and documented decisions. WHAT WAS FOUND: The youth team dropped fixed meetings, discussion meetings only happen biweekly if cases are pre-reported, coordination happens informally ad hoc, and no minutes are written. WHY VOLUME IS THE REAL CAUSE: Imposing formalized bureaucratic meeting structures and minute-taking assumes an organizational complexity that doesn't exist in a micro-team of three caseworkers who share an office and coordinate naturally throughout the day. QUOTE: "Alle ansatte opplyste at det skjer mye koordinering og samhandling i enkeltsaker ved behov, utenom møtene, og at de må vurdere tidsbruken sin nøye. Drøftingsmøtet blir derfor bare gjennomført annen hver uke, dersom noen har meldt opp saker på forhånd [...] Vi fikk opplyst at det ikke blir skrevet referat etter disse møtene..." MUNICIPALITY: Søndre Land YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial assistance / Quality assurance WHAT WAS EXPECTED: The NAV leader was expected to systematically use a comprehensive digital checklist in the case system (Socio) to document the verification of individual child assessments during the two-step case approval process. WHAT WAS FOUND: The manager does not utilize the full checklist to quality-assure cases, openly citing time constraints. WHY VOLUME IS THE REAL CAUSE: The heavy administrative burden of

systematically documenting comprehensive compliance checklists falls disproportionately on a single frontline manager acting as the sole quality-assurance mechanism, rather than on a dedicated back-office apparatus. QUOTE: "Videre fremstår dette som risiko for svikt i kvalitetssikringen, ved tidspress. Dette underbygges ved Nav-leders uttalelse om at det ikke er mulig å gå gjennom hele sjekklisten i Socio ved kvalitetssikring av vedtak, når de er under tidspress." MUNICIPALITY: Søndre Land YEAR: 2023

CLOSING FLAG Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as **moderate**, and state your reason.

The evidence is moderate because while structural vulnerabilities are explicitly clear—such as a rigid internal control system collapsing entirely due to the external shock of Ukrainian refugees, and an overburdened manager lacking time for extensive documentation checklists—the report also details genuine poor practices. Specifically, the municipality relied on automated standard deductions for large families ("stordriftsfordeler") and standard texts without conducting substantive, individualized assessments of children's actual needs, indicating methodological flaws alongside scale constraints.

Based on the analysis of the supervision report for Nav Hallingdal, here are the findings that point to underlying structural scale problems based on the six mechanisms:

MECHANISM: [P] PROCEDURAL CONTINUITY DOMAIN: Financial assistance (Mapping of children's needs) WHAT WAS EXPECTED: The office must systematically map and document the specific needs of children when families apply for financial aid. WHAT WAS FOUND: Although the office has a dedicated mapping form for children's needs, caseworkers do not have a common practice for using it, and the specialized mapping is frequently skipped. WHY VOLUME IS THE REAL CAUSE: With only 204 children receiving social assistance across the six cooperating municipalities over an entire year, generalist caseworkers encounter these specific child-mapping scenarios too infrequently to establish the specialized form as a repeatable, habitual pipeline. QUOTE: "Nav har ett kartleggingsskjema med spørsmål om barnas behov. I intervjuene kom det frem at det ikke er en felles praksis for bruk av skjemaet." MUNICIPALITY: Nav Hallingdal (Inter-municipal: Flå, Nesbyen, Gol, Hemsedal, Ål, Hol) YEAR: 2023

MECHANISM: [C] COORDINATION INFRASTRUCTURE DOMAIN: Financial assistance (Case processing) WHAT WAS EXPECTED: The municipality must ensure thorough, individualized assessments and implement management structures that systematically secure professional quality. WHAT WAS FOUND: The office fails to conduct these individualized assessments; instead, it relies entirely on a "generalist model" where frontline caseworkers handle everything from initial mapping to the final decision, and professional training happens informally. WHY VOLUME IS THE REAL CAUSE: The expectation of rigorous, systematic quality assurance of specialized assessments assumes an internal

complexity and separation of roles that a small inter-municipal office relying on frontline generalists inherently lacks. QUOTE: "I Nav Hallingdal har alle veiledere som behandler søknader om økonomisk stønad etter sosialtjenesteloven ansvar for både å kartlegge og vurdere/beslutte sakene. De jobber etter en såkalt generalistmodell." MUNICIPALITY: Nav Hallingdal YEAR: 2023

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Internal control / Quality assurance WHAT WAS EXPECTED: The municipality must have a functioning internal control system to formally register, monitor, and correct professional deviations (faglige avvik). WHAT WAS FOUND: The formal municipal deviation software (Risk Manager) is completely unknown to caseworkers, zero professional deviations have been logged, and issues are instead handled via informal "shoulder-to-shoulder" training. WHY VOLUME IS THE REAL CAUSE: Imposing a formalized, software-driven deviation reporting regime assumes an administrative back-office culture that does not fit small, close-knit teams where problem-solving naturally occurs informally and directly among peers. QUOTE: "Nav har et avvikssystem på kommunale tjenester (Risk Manager) som vil kunne fange opp faglige feil og mangler. Dette er ikke kjent eller i aktiv bruk hos saksbehandlerne." MUNICIPALITY: Nav Hallingdal YEAR: 2023

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as strong, moderate, or weak, and state your reason.

I rate the evidence as **weak**.

While the office exhibits the structural traits of a small organization (such as relying on a generalist model and ignoring formal deviation software), the core failures outlined in the report stem from blatant poor practice and negligence. Most notably, the office actively uses a local routine handbook that explicitly violates the law (unlawfully instructing staff to deny support for glasses or clothes), routinely applies standard rates without individual assessment, and staff admit they actively avoid asking about children's needs unless parents explicitly bring it up. Furthermore, the lack of capacity cited by the office is explicitly blamed on an acute external shock (a sudden influx of Ukrainian refugees), not an inherent lack of structural scale.

Based on the supervision report for NAV Karlsøy, the municipality was **not sanctioned** and the inspection concluded with **zero violations of the law**. The State Administrator found the municipality's services to be fully sound and compliant.

However, the supervisor did make two minor findings/observations regarding deviations from formal administrative procedures. While not severe enough to warrant a formal sanction, they perfectly illustrate the friction between national bureaucratic expectations and the realities of a very small office (which only has four full-time equivalents).

Here are the extracted findings:

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial advice (økonomisk rådgivning) WHAT WAS EXPECTED: The NAV office is required to formally document and journalize all relevant information that emerges during the follow-up of users to ensure verifiability. WHAT WAS FOUND: In a few cases, journalizing/documentation was missing, though the supervisor noted that the caseworkers had a good overview of the cases regardless. WHY VOLUME IS THE REAL CAUSE: In a very small office, caseworkers naturally maintain a complete personal, mental overview of their relatively few clients, making strict documentation regimes feel redundant and administratively burdensome. QUOTE: "Vi fant noen få saker hvor det manglet noe journalføring, men hvor de ansatte ved kontoret hadde god oversikt over sakene." MUNICIPALITY: Karlsøy YEAR: 2024

MECHANISM: [D] DOCUMENTATION APPARATUS DOMAIN: Financial advice (økonomisk rådgivning) WHAT WAS EXPECTED: The NAV office must make formal, written administrative decisions (skriftlige vedtak) before or when providing the financial advice service. WHAT WAS FOUND: A few users continuously received the advisory service from their caseworkers without any formal written decision ever being generated for that specific service. WHY VOLUME IS THE REAL CAUSE: Because caseworkers in a small office must operate as complete generalists with holistic, cross-domain responsibility for their users, they dynamically provide advice as needed without stopping to process distinct administrative paperwork for every specific intervention. QUOTE: "Det nevnes i intervju at det kan være en og annen bruker i porteføljene til den enkelte veileder som får tjenesten uten at det nødvendigvis fattes vedtak om tjenesten." MUNICIPALITY: Karlsøy YEAR: 2024

CLOSING FLAG

Does this report show a municipality sanctioned for structural scale problems rather than actual poor practice? Rate the evidence as strong, moderate, or weak, and state your reason.

Weak (No Sanction). The Karlsøy NAV office was explicitly **not sanctioned**; the inspection concluded that there were zero legal violations and that the services provided were highly satisfactory. While the report highlights minor administrative irregularities—specifically missing journal entries and formal decisions that are highly characteristic of a small-scale office relying on personal oversight rather than rigid bureaucracy—the State Administrator accepted their practices as legally sound and effectively adapted to their scale.