Bureaucratic Whistleblowing:
Theories, Literature, and Policies in the U.S. Federal Bureaucracies

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Consulate General of the Republic Of Korea Comparative Study Group
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Agenda

1. Overview: Bureaucratic Whistleblowing (BW)
2. Systematic Literature Review: Definitions, Theories, and Models
3. Whistleblowing Systems in the U.S. Federal Government
4. Effects of the Protection Law

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Overview

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Origin of term

- The use of a whistle to alert the public about a bad situation, such as the commission of a crime or the breaking of rules.

- In general, this umbrella term comprises:
  - Bureaucratic whistleblowing;
  - Private sector employee whistleblowing;
  - Public bell-ringing behavior;
  - Harassment complaints such as #metoo movement

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- In any country, whistleblower protection law is *a patchwork law*

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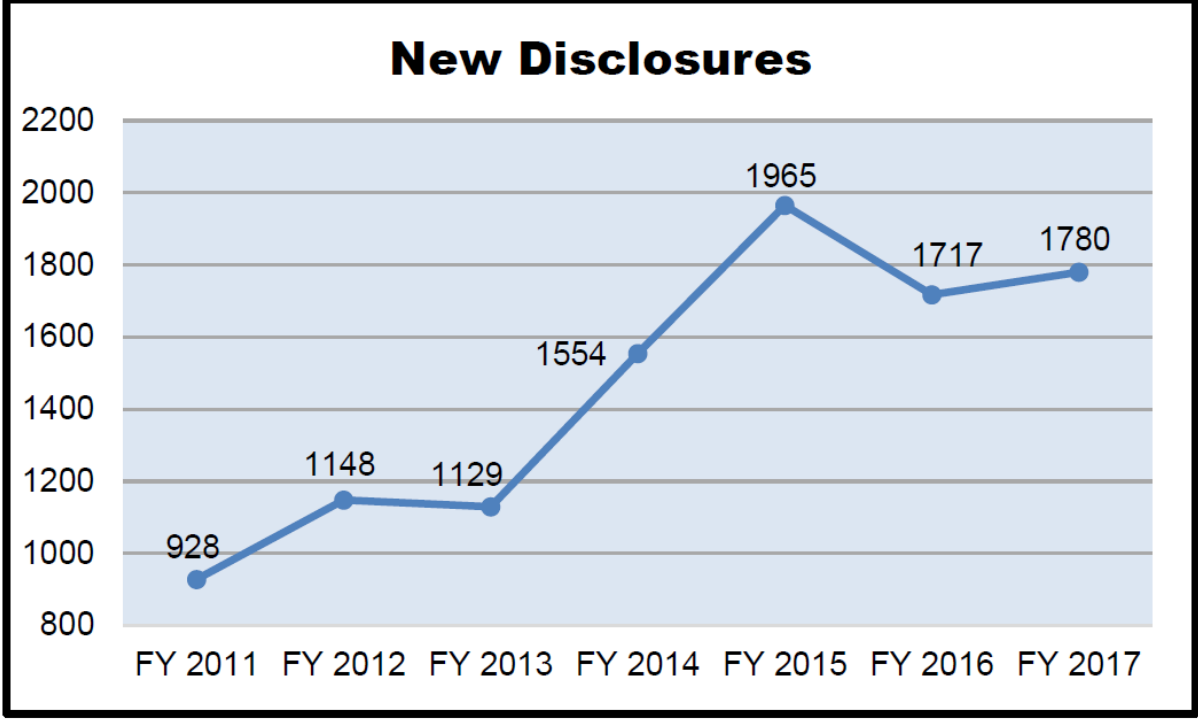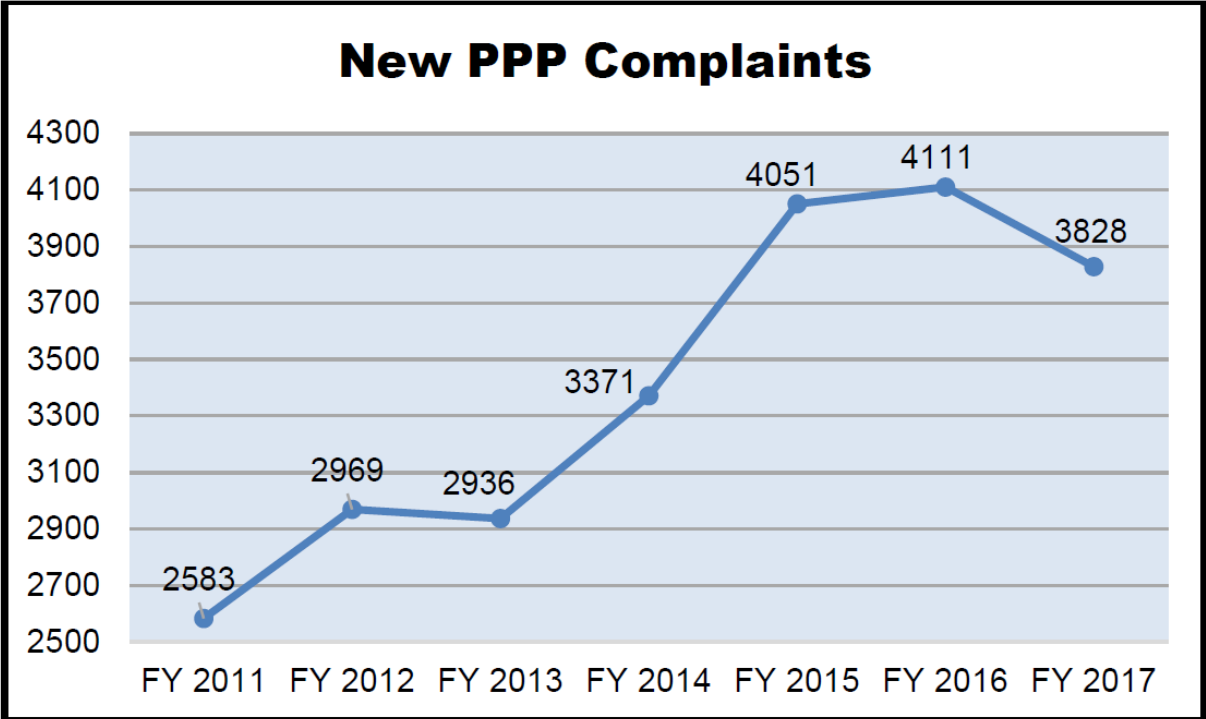
Civil Service Reform Act of 1978 (CSRA)

- In responding to Watergate in 1972 and Nixon's Resignation in 1974
- Reforms in the U.S. Civil Service Systems regarding three areas (Ingraham, 1995):
  - Competence values
  - Merit principle values
  - Democratic values
- Firstly authorized federal bureaucrats' whistleblower rights as a constitutional law (Vaughn, 2013)

Whistleblower Protection Act of 1989 (WPA)

- The Office of Special Counsel (OSC): A *prosecutorial* agency
- The Merit Systems Protection Board (MSPB): A *quasi-judicial* agency
- Authorized status quo ante, back pay, medical costs, attorney fees, and consequential damages

Whistleblower Protection Enhancement Act of 2012 (WPEA)

Overview: Whistleblowing

Theoretical standpoint: Questions, Problems, and Angles

Three baseline questions

1. Definitional problem
2. Theoretical problem
3. Modeling problem
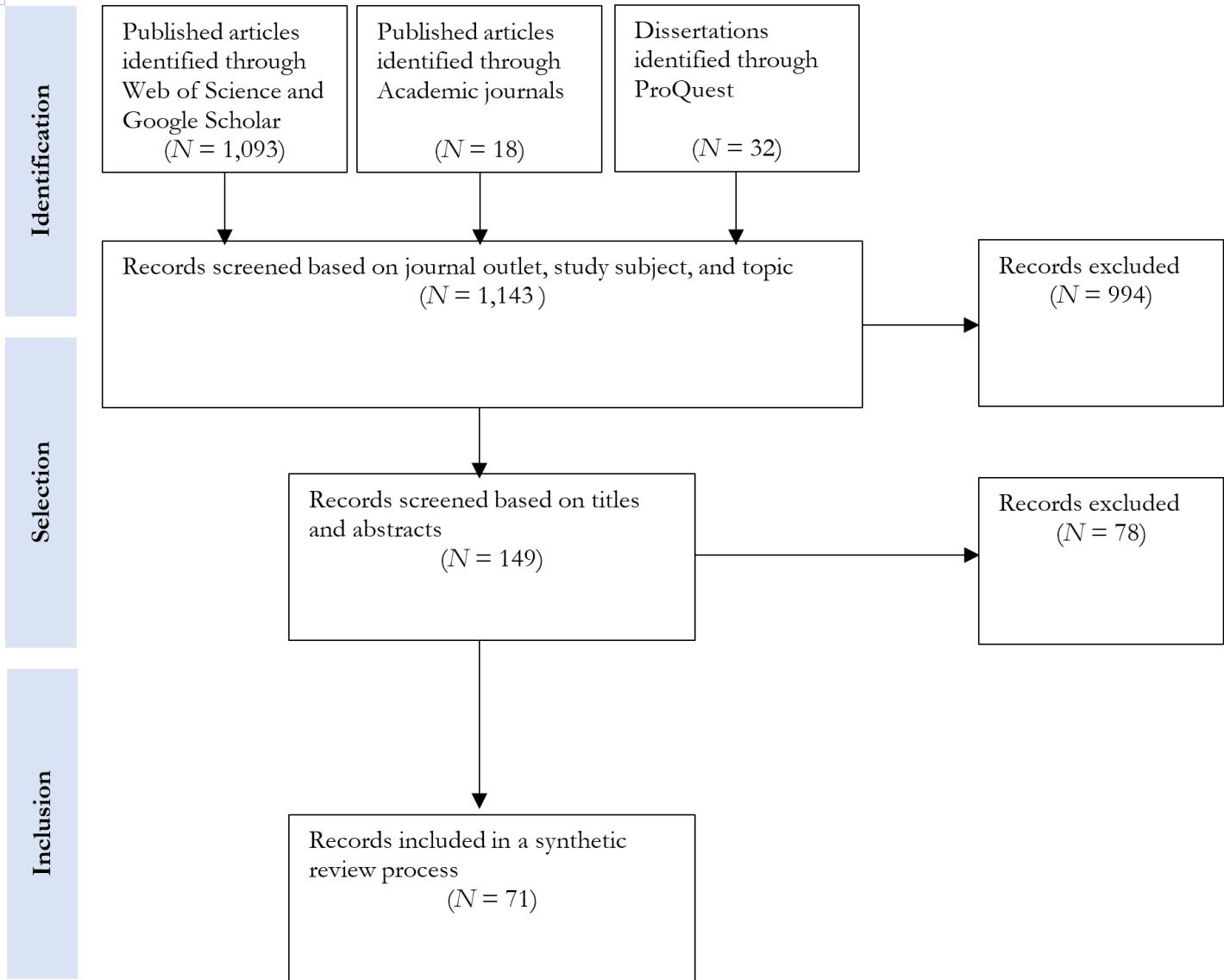
Systematic Literature Review (PRISMA)

Figure 1. Literature Identification, Selection, and Inclusion PRISMA Flowchart
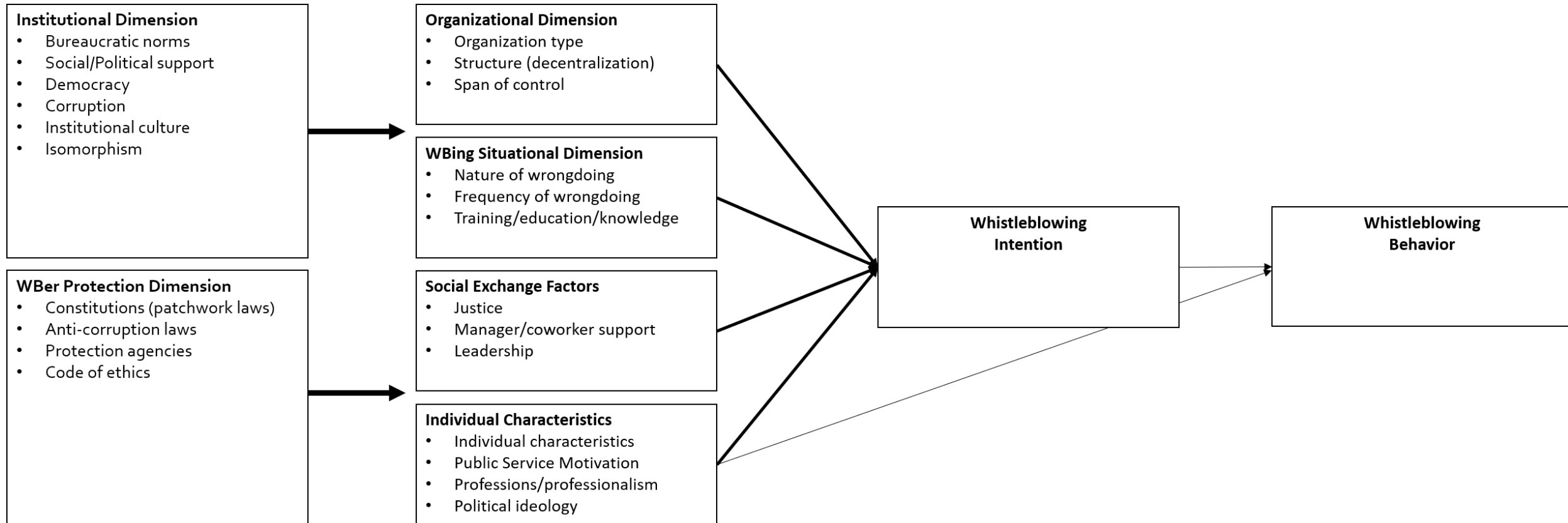
Question 1: How to define BW?

	Process Definition (Near & Miceli, 1985)	Legal Definition (The CSRA, 1978)
Definition	*"the disclosure by organizational members (former or current) of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organizations that may be able to affect action*	*"the lawful disclosures of information which the employees reasonably believe evidences regarding a) a violation of any law, rule, or regulations or b) mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety"*
Features	• High generalizability • Applicable to all organizations • Psychological view • Academic	• Legal approach • Bureaucracy-specific: legal aspects • Public administration view • Constitutional
Frequency	59%	15%

Question 2: What theories can explain BW?

Table 3. Theories and themes used in the sample

Category: Theories and themes	Number (%)
1. HRM/ethics/psychology	43 (61%)
2. Whistleblowing: Near & Miceli (1992)	25 (35%)
3. Organizational theory and behavior	24 (34%)
4. Constitutional basis/protection/protection law	23 (32%)
5. Social exchange theory	13 (18%)
6. Exploratory/fact-finding	9 (13%)
7. Corruption	6 (8%)
8. Bureaucratic politics	5 (7%)
9. Accountability	4 (6%)

Question 3: How to model BW?

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Whistleblowing Systems in the US Federal Government

Bureaucratic Whistleblowing channels

Internal channels:
- Immediate supervisor and coworker
- Agency heads
- Agency Office of the Inspector General (OIG)

External but still governmental channels:
- The Office of the Special Counsel (OSC)
- The Occupational Safety and Health Administration (OSHA)
- The Government Accountability Office (GAO)

External channels:
- The U.S. Congress
- The media, watchdog organizations, and non-profit organizations

Office of Special Counsel

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HOW TO USE OSC FORM-14

1. Click the link above to access OSC Form-14. Depending on your browser this will open or download the file. Please be sure to use Adobe Acrobat or Adobe Acrobat Reader to complete your form.

2. You will start by selecting a checkbox based on your complaint or disclosure and select Next.
(You may select more than one box.)

3. Depending on your selections, you will be asked to fill in information. (Fields marked with a * are required. OSC cannot process incomplete forms lacking necessary information. Large fields have a word limit. The form will stop entering text in the field after your have reached this limit. You may save the file to your computer and return to it at any time.)

4. After providing details of your complaint or disclosure select save to ensure

USEFUL TIPS

As all computers are set up differently you may experience opening Form-14 in different ways.

- If you receive a "Please wait..." message, please right click on the Form-14 link and select "Save Link As" or "Save Target As". From your downloads select the downloaded Form 14 PDF to open in Adobe.

- If you have trouble in one Internet browser, try another.

- If you are using a government computer, you must follow the computer rules of your agency. If you

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Effects of the Protection Law:
The WPEA of 2012

A critical question remains unanswered

So far, we have obtained a number of meaningful knowledge with respect to

- Who are likely to blow the whistle;
- Why they are motivated to blow the whistle;
- Which laws are available to protect bureaucratic whistleblowers;
- How institutional, cultural, and organizational factors influence the incidence of whistleblowing
- What is necessary to make whistleblowing effective

Nonetheless, there is little, or no, empirical evidence of the effects of the protection law

- Question: Do the provision of statutory whistleblower protection translate into a better democratic culture where bureaucrats can voice their concerns without fear of retaliation?
- In simple words, protection law can change the bureaucrats' mind?

Whistleblower Protection Enhancement Act of 2012 (WPEA)

An institutional-level statutory reform in Obama administration (2012)

Major changes in the WPEA:

- Protection under the WPEA is *extremely* broad

- Protects *any* disclosure of a statutory condition: Violations, gross waste, gross mismanagement, abuse of authority, and danger to public health/safety

- Strengthen the OSC's ability to pursue disciplinary action

Most importantly, the WPEA extends protections to the Travel Security Administration (TSA under the DHS) – An experimental setting

A Natural Experiment: The WPEA

Figure 1.

Research Design: A Natural Experiment

Identification Strategy

Signaling Hypotheses

- Conventional Difference-in-differences model:

$$WBI_{iwa} = \alpha_0 + \alpha_1 DHS_a + \textcolor{red}{\alpha_2 WPEA_w} + \textcolor{red}{\alpha_3(DHS_a \times WPEA_w)} + \beta_2 X_{iwa}^{IND} + \beta_3 X_{iwa}^{ORG} + \varepsilon_{iwa}$$

  - $\textcolor{red}{\alpha_2}$ = Difference in WBI for the sample b/w post- and pre-WPEA
  - $\textcolor{red}{\alpha_3}$ = Trends in WBI in DHS compared to the sample

Resource Hypotheses

- Difference-in-differences with Two-way Fixed Effects Model:

$$WBI_{iwa} = \beta_0 + \textcolor{blue}{\beta_1(DHS_a \times WPEA_w)} + \textcolor{green}{\beta_2 X_{iwa}^{IND} + \beta_3 X_{iwa}^{ORG}} + \textcolor{purple}{\tau_t + \theta_a} + \varepsilon_{iwa}$$

  - $\textcolor{blue}{\beta_1}$ = Differential Impact of WPEA on DHS bureaucrats WBI, while holding constant of:
    agency-and-year-varying effects from the covariates ($\textcolor{green}{\beta_2 + \beta_3}$) and *agency-and-year-specific trends* ($\textcolor{purple}{\tau_t + \vartheta_\alpha}$)

Data and Sample

Federal Employee Viewpoint Survey (FEVS)

- Administrative survey from 2009 to 2018 (10 years)
  - 3 years before- and 7 years after- the treatment
- Sampling weights applied

Fed-Scope Workforce Cube (FedScope)

- Sample distribution in FEVS checked and matched
- Organizational factors

Sample: Approximately 400 thousand response from the federal bureaucrats

- Total 407,631 observations within four U.S. department-level federal agencies
  - Treatment sample (TSA) N = appx. 80 thousand
  - Control sample (Justice, Labor, and GSA) N = appx. 320 thousand

Table 5. Differential Impacts of WPEA on Federal Bureaucrats' Whistleblowing Intention

	Full Sample		Managers Sample		Non-managers Sample	
	DiD	Generalized DiD	DiD	Generalized DiD	DiD	Generalized DiD
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TSAxWPEA $t+2$	0.072***	0.041**	0.107**	0.071*	0.066***	0.040*
TSAxWPEA $t+4$	-0.078	0.028	-0.072	0.024	-0.071	0.029
TSAxWPEA $t+6$	-0.009	0.008	-0.105	0.008	0.009	0.012
COVARIATES						
Exit intention		-0.000		0.002		-0.002
Loyalty		0.295***		0.278***		0.298***
Work Satisfaction		0.067**		0.036*		0.073**
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Cowerker Support		0.109***		0.082***		0.114***
BIAS CONTORLS						
Covariates		Yes		Yes		Yes
Agency FE		Yes		Yes		Yes
Year FE		Yes		Yes		Yes
Clusters	Yes	Yes	Yes	Yes	Yes	Yes
Observations	407,631	362,735	80,683	78,603	326,948	284,132
R-squared	0.0276	0.4912	0.0309	0.5046	0.0297	0.4771

Notes: (a) Columns report unstandardized coefficients. All the models were weighted and clustered at the agency- and year- level. (b) Effects of law were estimated in a temporal manner: TSAxWPEA t+2 referts to the average effect of the law in 2013 to 2014; +4 refers to 2015 to 2016; +6 refers to 2017 to 2018. (c) Effects of law were estimated based on the use of control agencies. The control agencies includes: Dept. Justice, Dept. Labor, and General Service Administration. (d) All without covariates models (2, 4, 6, and 8) provides the number of missing observations compared to without controls models. Coefficients for DHS, WPEA, Size, and Budget were omitted in DiD with Fixed effects models since those agency- and year-

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Observations	407,631	362,735	80,683	78,603	326,948	284,132
R-squared	0.0276	0.4912	0.0309	0.5046	0.0297	0.4771

Notes: (a) Columns report unstandardized coefficients. All the models were weighted and clustered at the agency- and year- level. (b) Effects of law were estimated in a temporal manner: TSAxWPEA t+2 referts to the average effect of the law in 2013 to 2014; +4 refers to 2015 to 2016; +6 refers to 2017 to 2018. (c) Effects of law were estimated based on the use of control agencies. The control agencies includes: Dept. Justice, Dept. Labor, and General Service Administration. (d) All without covariates models (2, 4, 6, and 8) provides the number of missing observations compared to without controls models. Coefficients for DHS, WPEA, Size, and Budget were omitted in DiD with Fixed effects models since those agency- and year-

Concluding remarks

Theoretically,

1. BW can be a means to identify the nature of *representative democratic bureaucracy* (Bowman, 1980; Mosher, 1968; Ingraham, 1995; Waldo, 1946)

2. BW is still *at a preliminary stage* in the field of public administration, although several theoretical, empirical, and practical attempts have been made so far.

3. To *theorize* bureaucratic whistleblowing, following tasks would be the next step:
    1. Defining bureaucratic whistleblowing
    2. Applying the public administration theories beyond the PA ethics lenses
    3. Providing empirical evidence of the effects of protection

4. The legal approach to public administration would be a solid baseline, while the managerial and the political approaches are still to be valid (Rosenbloom, 1987)

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Concluding remarks

Practically,

1. An array of whistleblower protection institutions in the US has greater implications for Korean government, since the political system is exactly the same

2. Unlike other policy areas, whistleblower protection systems of the US is way more advanced than that of Korea

3. The quality of social capital in Korea, however, is often considered to be much better compared to the US – calls for further implications for Korea

4. Nonetheless, whistleblower protection at the local level might be a completely different story