

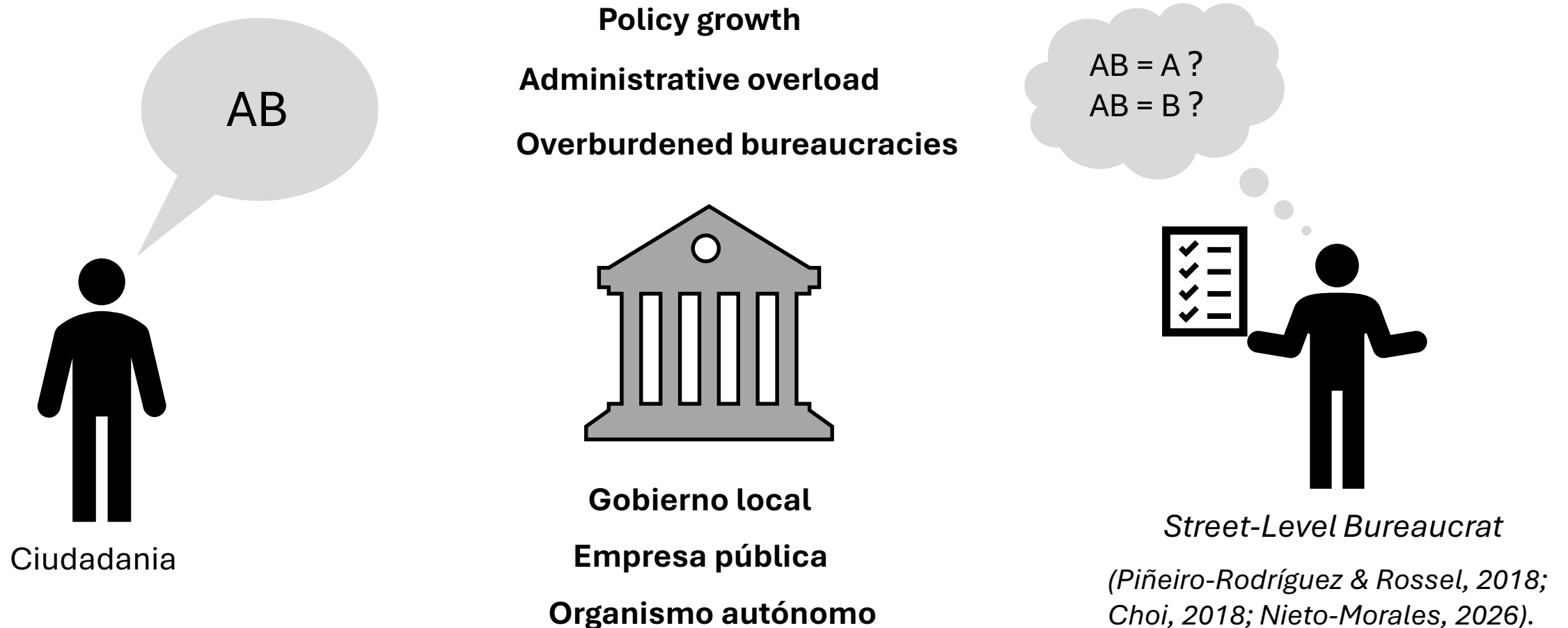
The Limits of Transparency: How Administrative Overload Shapes Street-Level Implementation of FOI

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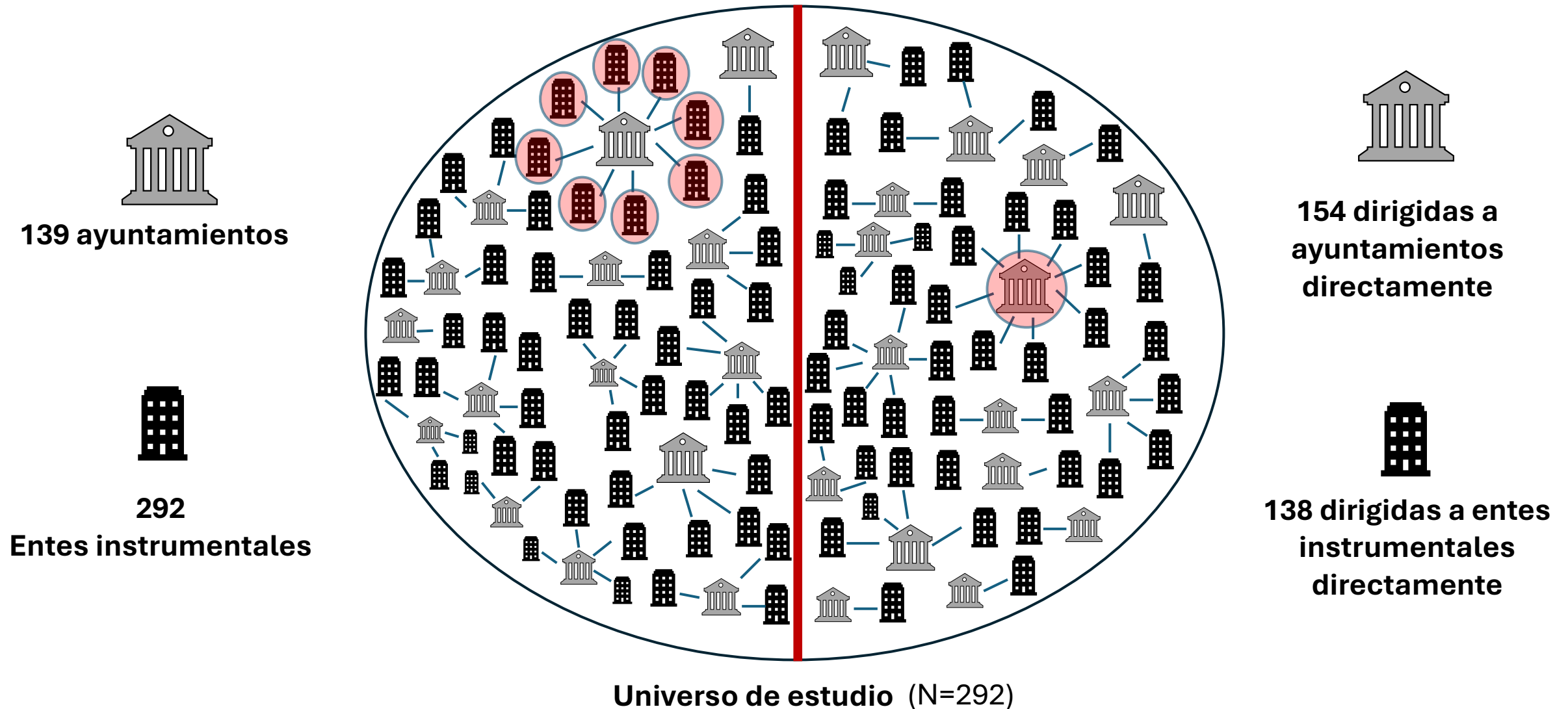
Lluís Medir Tejado (Universidad de Barcelona)

Esther Pano Puey (Fundació Carles Pi i Sunyer)

Marco teórico: transparencia pasiva y discrecionalidad



Diseño del experimento I: sector público local heterogéneo



Diseño del experimento II: Petición de información

En ejercicio del derecho de acceso a la información pública contenido en la Ley 19/2014, de 29 de diciembre, de transparencia, acceso a la información pública y buen gobierno, solicito los siguientes datos de [Nombre ente]

Las retribuciones de altos cargos y personal directivo lo más desagregadas legalmente posible y, siempre que sea posible, por sexo. El número de **estudios e informes solicitados a sujetos externos a su organización a cambio de una contraprestación económica**. Y de estos, además:

- La cifra exacta de la contraprestación abonada por el estudio o informe en cuestión.
- El sujeto (entidad) al que se hayan encargado dichos estudios/informes.
- El objeto del estudio/informe, lo más específico posible.

Se solicita esta información correspondiente al año 2025.

En relación con el formato, se solicita en formato Excel. En caso de que se considere que no es posible, se acepta cualquier otro formato.

Finalmente, se solicita un **correo electrónico o teléfono de contacto de la persona encargada de la gestión de la transparencia** de [Nombre ente]

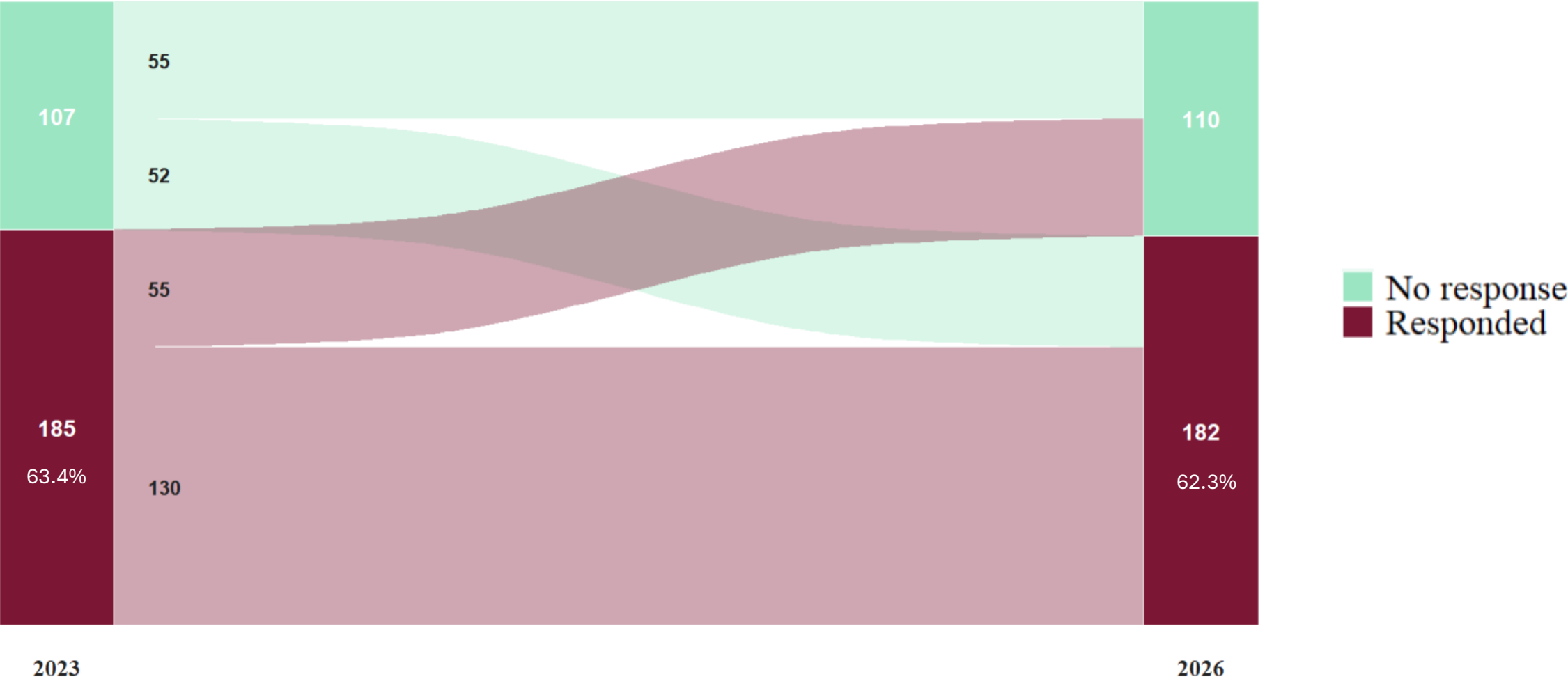
Table 1. Indicators of Passive Transparency

Dimension	Indicator	Description	Scoring.criteria	Score
Salaries	Salary disaggregation by sex	Whether salary information is disaggregated by sex	0 = No; 1 = Yes	1
	Salary disaggregation	Extent to which salary information is disaggregated	0 = None; 1 = Aggregate salary reported; 2 = Position-related supplements reported; 3 = Personal supplements reported	3
Studies and reports	Number of studies/reports	Whether the number of studies/reports is explicitly reported	0 = Not reported; 1 = Reported	1
	Cost of studies/reports	Whether the cost of studies/reports is reported	0 = Not reported; 1 = Reported	1
	Authorship of studies/reports	Whether the authorship of studies/reports is reported	0 = Not reported; 1 = Reported	1
	Subject of studies/reports	Extent to which the subject of studies/reports is specified	0 = Not reported; 1 = Identified but unclear; 2 = Detailed	2
Transparency contact	Transparency contact person	Whether a contact person responsible for transparency is identified	0 = Not identified; 1 = Contact reported	1

Source: Authors' own elaboration.

Resultados cuantitativos I: Tasa de respuesta

Evolution of FOI Request Response Status (2023–2026)



Resultados cuantitativos II: Tiempo de respuesta

Response Time and Deadline Compliance (2023–2026)

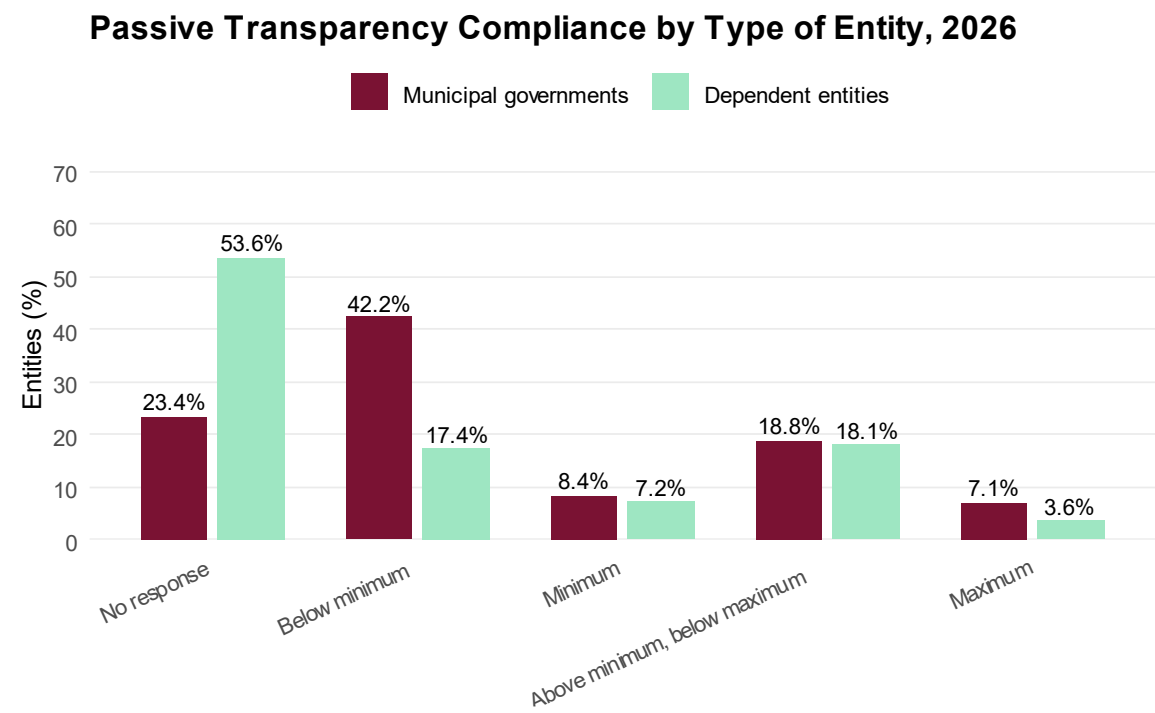
Measure	2023	2026
Within-deadline responses	68.1%	56.6%
Mean response time	26.9 days	30.5 days

Response Time and Deadline Compliance by Type of Entity (2023–2026)

Measure	2023		2026	
	Municipal governments	Dependent entities	Municipal governments	Dependent entities
Within-deadline responses	68.1%	68.1%	55.2%	60.9%
Mean response time	29.1 days	23.4 days	31.8 days	28.2 days

Source: Authors' own elaboration.

Resultados cuantitativos III: Calidad de la respuesta

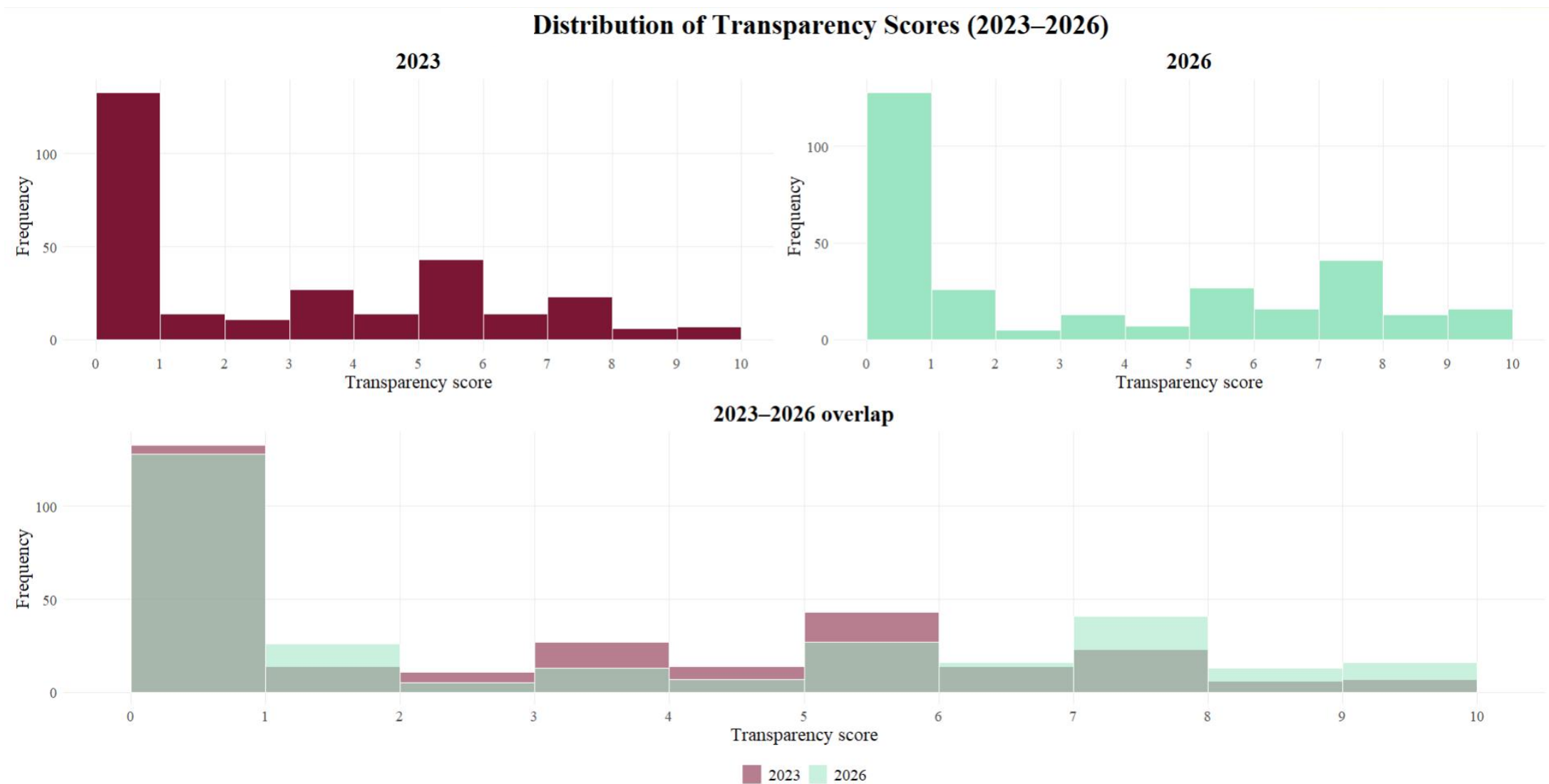


Distribution of Entities by Passive Transparency Compliance, 2026

Compliance category	N	%
No response	110	37.7%
Below minimum	89	30.5%
Minimum	23	7.9%
Above minimum, below maximum	54	18.5%
Maximum	16	5.5%

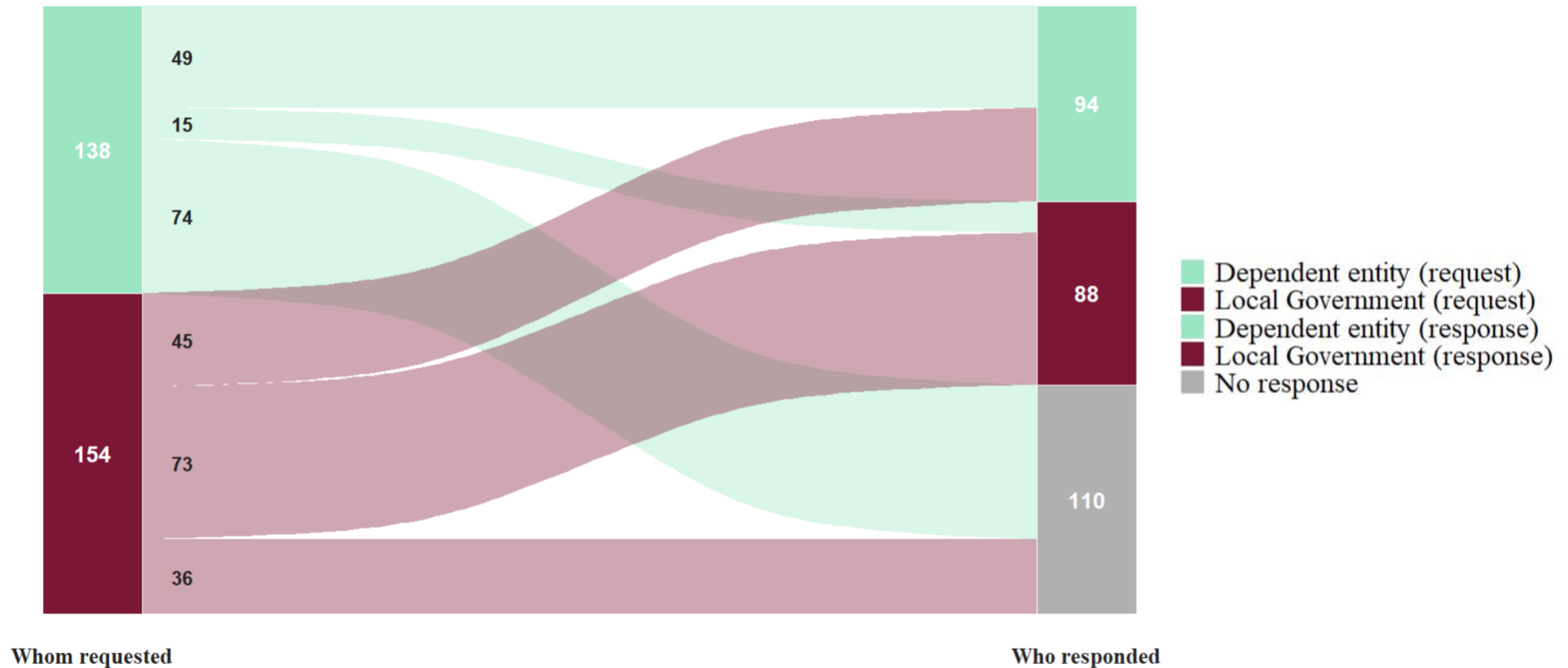
Source: Authors' own elaboration.

Resultados cuantitativos IV: Evolución de la respuesta



Resultados cuantitativos V: Derivación la respuesta

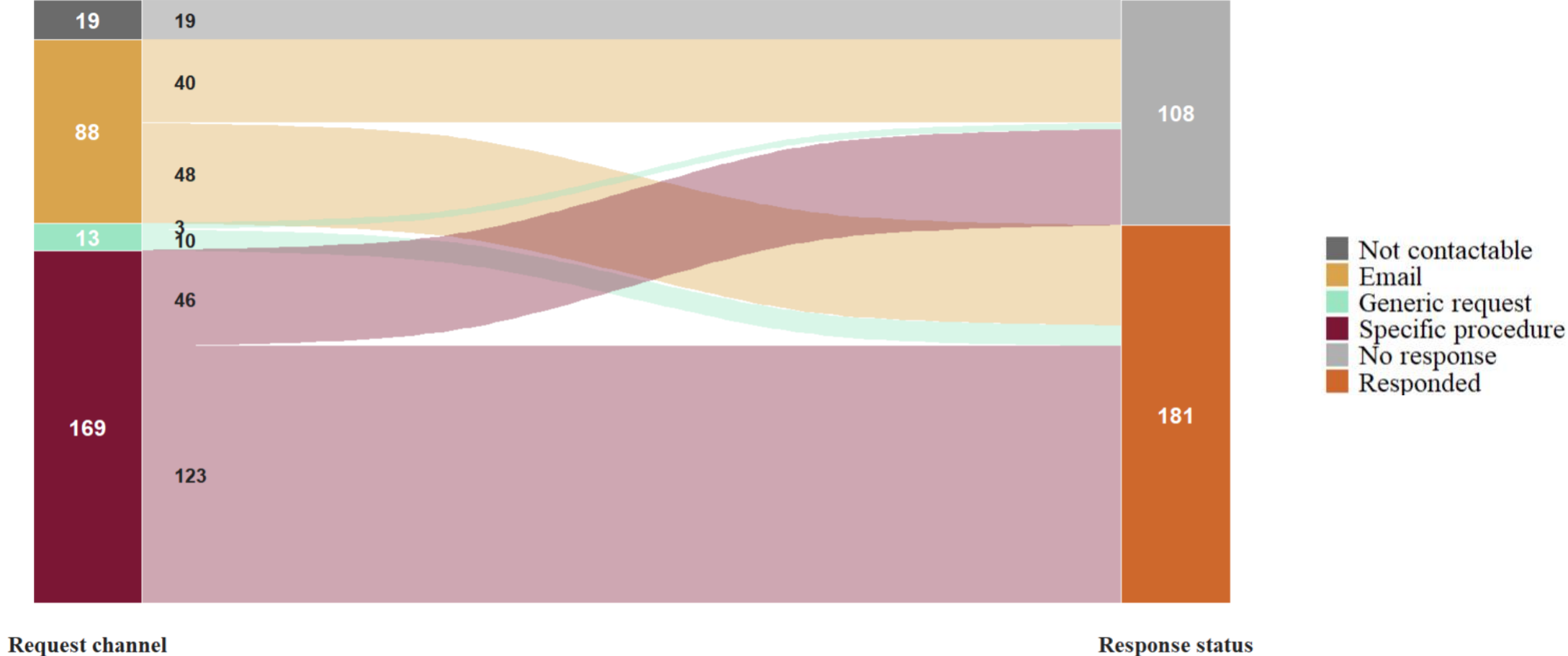
Requester vs. Responder in FOI Requests (2026)



Source: own elaboration

Resultados cuantitativos VI: Canal de petición

Request Channel and Response Status (2026)



Source: own elaboration

Resultados cualitativos : Estrategias defensivas

Necesidad de tomar notas de campo
(Walby & Larsen, 2012)

Etnografía accidental
(Fujii, 2015)

Trabas en la derivación de solicitudes

Interpretación restrictivas de:

- Concepto de personal directivo
- Concepto de retribuciones

Remisión genérica a portales de transparencia

Prácticas de Information overload

Agenda de investigación

1. Factores contextuales, factores de organización, factores de diseño de la política (Spáč, 2018; Wagner, 2021; Yang, 2026)
2. Transparencia dinámica (Lagunes & Pocasangre, 2019)
3. Sistemas de información (Carter & Stratton, 2021; Stratton & Carter, 2023)
4. Abordaje etnográfico (Walby & Larsen, 2012; Fujii, 2015)
5. Nuevos Street-Level Bureaucrats (Smith & Lipsky, 1994; Larsen et al., 2025)

Bibliografia

- Carter, D., & Stratton, C. (2021). Information Systems as Mediators of Freedom of Information Requests. *Diversity, Divergence, Dialogue*, 12646, 274–282. doi:https://doi.org/10.1007/978-3-030-71305-8_22
- Choi, J. M. (2018). Factors influencing public officials' responses to requests for information disclosure. *Government Information Quarterly*, 35(1), 30-42. doi:<https://doi.org/10.1016/j.giq.2017.11.007>
- Fujii, L. A. (2015). Five stories of accidental ethnography: turning unplanned moments in the field into data. *Qualitative Research*, 15(4), 525-539. doi:<https://doi.org/10.1177/1468794114548945>
- Lagunes, P., & Pocasangre, O. (2019). Dynamic transparency: An audit of Mexico's Freedom of Information Act. *Public Administrations*, 97(1), 162–176. doi:<https://doi.org/10.1111/padm.12553>
- Larsen, F., Møller, M., & Raaphorst, N. (2025). Public management and street-level bureaucrats. *Public Management Review*, 27(8), 1857–1867. doi:<https://doi.org/10.1080/14719037.2025.2493875>
- Nieto-Morales, F. (2026). Making Transparency Work: FOI Officials as Relational Managers. *Politics & Policy*(4). doi:<https://doi.org/10.1111/polp.70156>.
- Piñeiro-Rodríguez, R., & Rossel, C. (2018). A field experiment on bureaucratic discretionary bias under FOI laws. *Government Information Quarterly*, 35(3), 418-427. doi:<https://doi.org/10.1016/j.giq.2018.06.001>
- Smith, S. R., & Lipsky, M. (1993). *Nonprofits for hire: the welfare state in the age of contracting*. Cambridge, Massachusetts: Harvard University Press.
- Spáč, P., Voda, P., & Zagrapan, J. (2018). Does the freedom of information law increase transparency at the local level? Evidence from a field experiment. *Government Information Quarterly*, 35(3), 408-417. doi:<https://doi.org/10.1016/j.giq.2018.05.003>
- Stratton, C., & Carter, D. (2023). Locating information systems in the freedom of information process. *Government Information Quarterly*, 40(2), 1-12. doi:[10.1016/j.giq.2023.101807](https://doi.org/10.1016/j.giq.2023.101807)
- Wagner, A. J. (2021). Piercing the veil: Examining demographic and political variables in state FOI Law administration. *Government Information Quarterly*, 38(1). doi:<https://doi.org/10.1016/j.giq.2020.101541>
- Walby, K., & Larsen, M. (2012). Access to Information and Freedom of Information Requests: Neglected Means of Data Production in the Social Sciences: Neglected Means of Data Production in the Social Sciences. *Qualitative Inquiry*, 18(1), 31-42. doi:<https://doi.org/10.1177/1077800411427844>
- Yang, W. (2026). Institutional Pressures and Bureaucratic Responsiveness: Why Do Public Agencies Respond to Freedom of Information Requests? *Public Administration Review*, 86(2), 354-370. doi:<https://doi.org/10.1111/puar.70013>.