



# CHINA'S LOCAL POLICYMAKERS' STRATEGIC ADAPTATION TO POLITICAL CENTRALIZATION

A circular collage composed of 16 triangular segments radiating from a central white point. The segments contain various images: a teal star, an orange star, a red star, a portrait of a man, a man in a suit, a rainy street, a hostel sign, and a building.

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# **PARALYSIS VERSUS OBEDIENCE:**

## **CHINA'S LOCAL POLICYMAKERS' STRATEGIC ADAPTATION TO POLITICAL CENTRALIZATION**

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## ■ About the Author

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## ■ About the Asia Program

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## Key Takeaways

Under the concept of “top-level design,” President Xi Jinping has repurposed institutions to eliminate problems caused by local discretion such as corruption and policy implementation gaps.

Increasing centralization of policy and strict penalties for lack of compliance is resulting in local officials no longer experimenting with policy to solve local governance problems and instead focusing more on documenting procedures than actually governing.

These strategic adaptations lead to erratic policy swings between paralysis and overcompliance at the local level, and an increasingly rigid and unresponsive policy process.

Although these institutional changes are resulting in less corruption and more standardized governance (rule by law), they also reduce the local feedback and policy autonomy that constructed a more durable system than normally seen in authoritarian regimes (so-called “resilient authoritarianism”).



# Introduction

According to its Constitution, China is a unitary state; however, as part of economic reform in the 1980s and early 1990s, the central government delegated administrative authority to the provinces. Administrative delegation authorized local governments' autonomy in governing and resulted in a de facto functional division between the central and local state.<sup>1</sup> In order to align the interests of local state agents in this decentralized system with over thirty-three provincial-level regions, 334 prefecture-level divisions, 2,862 county-level divisions, 41,034 township-level administrations, and 704,382 village-level divisions, the central government relies on a personnel management system linking evaluation to promotion. The national cadre evaluation system that developed in the reform era uses performance targets to create incentives for local officials to govern according to common priorities, resulting in fairly stable patterns of behavior.<sup>2</sup> Under this system, the central party Organization Department appoints and reviews officials at the provincial level (one-level down). This same "one-level down" process occurs annually at the subnational level to assess cadre performance and determine promotions and raises.<sup>3</sup> This competitive process creates a "political tournament" of performance-based promotion whereby local cadres endeavor to implement the central policy agenda to demonstrate merit.<sup>4</sup> As Yongnian Zheng famously pointed out, the Chinese

Communist Party became an "organizational emperor" during the reform era, and the strong personnel management system is the most important mechanism explaining regime durability.<sup>5</sup> In fact, to the extent that there is a consensus understanding of Chinese politics, most scholars would agree that the cadre evaluation system best explains local officials' behavior, including disregarding central policies to implement local interests resulting in "policy implementation gaps."<sup>6</sup>

Thus, over the reform era (1979 to 2012), China's public-administration system developed both a strong central Party-state and an extensive system of grassroots governance, linking the two via achieving policy targets outlined in the annual cadre evaluations. However, as this centralized personnel management system interacted with the decentralized governance model (sometimes called "Fragmented Authoritarianism"<sup>7</sup>) researchers observed challenges, including an inability to equally incentivize agents at lower levels of the system that are not being promoted out of home provinces, as well as the fact that performance goals are outcome-oriented, allowing varying tactics to achieve mandated goals. In addition to these challenges, scholars also identified problems applying negative incentives and in monitoring local agents, such that promotion decisions were often made without accurate information.<sup>8</sup> Simply put, this system lacked enough

“connective tissue” to seamlessly link policy ideas developed at the top with implementation and enforcement at the bottom. To achieve President Xi Jinping’s goal of “top-level design” and eliminate fragmentation and local discretion, he has been repurposing institutions to serve as this connective tissue linking central and local governments to eliminate policy implementation gaps and other problems caused by local discretion such as corruption. Local officials also recognized the structural problems in the Fragmented Authoritarianism system, especially policy competition and corruption, and many supported the institutional reforms championed by Xi.

Xi has converted existing institutions and practices such as leading small groups (LSGs)<sup>9</sup> and campaign-style policymaking to achieve new goals. The two main changes observed with top-level design are policy “conglomeration,” where policy authority is aggregated or consolidated via super-ministries, and merging Party-State responsibilities. This institutional reform unifies policy authority into one entity, from previously fragmented departments, with a high bureaucratic rank and also layers in Party leadership such that the Party is the policymaker and the State entity serves strictly as policy implementer. This reform removes policy discretion in implementation from both central state and local state to the Party. The other interconnected change is the creation of “coordinating institutions,” where LSGs control the policy process directly through campaign-style policymaking tactics in many key policy areas, including national security and poverty alleviation. The enforcement mechanism

is the ability to requisition local state agents and embed “key tasks” in annual evaluations,<sup>10</sup> supported by new forms of digital monitoring of local officials.<sup>11</sup> These reforms eliminate the vertical bargaining by local state agents and horizontal competition among central ministries normally observed in the Fragmented Authoritarianism model. However, as Thelen reminds us, endogenous institutional change is a process with both “rule-makers” and “rule-takers,”<sup>12</sup> and rule-takers such as local officials may obstruct or reshape the process of institutional change.<sup>13</sup> Tsai examines this very process occurring with new environmental regulations interacting with the “growth imperative” for local officials in promotion and finds that “friction” between rules or between formal and informal rules and norms results in unanticipated outcomes.<sup>14</sup>

In this report, I examine how these institutional changes of policy conglomeration and coordination, coupled with the increasing use of punishment in the cadre evaluation system, increase political pressure on local officials while removing policy discretion, resulting in two main strategic adaptations: less policy experimentation and less active work styles (also described as bureaucratic slack or formalism). The strategic adaptations adopted by the “rule takers” explored in this chapter illustrate how extensive and deep these institutional changes are at the local level. I find that while these reforms do increase coordination and compliance, they also result in what Xiao and Jiale Ma call “policy implementation distortion” where local officials veer between overcompliance (“blunt force regulation”)<sup>15</sup> and paralysis (bureaucratic slack).<sup>16</sup> Moreover, the challenges identified

**Table 1: Survey Sample Description**

Variable	Min	Max	Mean	Std.dev	obs
Age	20	60	32.44	6.47	1,425
Male	0	1	0.51	0.50	1,425
Minority	0	1	0.05	0.21	1,425
CCP member	0	1	0.75	0.44	1,425
Education level	1	5	3.18	0.61	1,411
Position rank	1	7	2.06	1.32	1,345
Government level	1	5	2.20	0.92	1,425

NOTE: Education level: 1=high school, 2=college, 3=bachelor, 4=master, 5=PhD; Position rank: 1=clerk, 2= cadre, 3=deputy section head, 4=section head, 5=deputy division head, 6=division head, 7=deputy bureau director; government level; Government level: 1=township, 2=county, 3=municipal, 4=province, 5=central government.

in our survey of local officials highlight an overdependence on quantifiable targets, high levels of uncertainty, perceived risk for civil servants, and removing local discretion such that policies can be implemented quickly but lack local adaptation or feedback. The new role of strict policy implementation also means that local officials do not have as much latitude to adapt to local conditions or to design experiments to solve local issues. Additionally, the extremely hierarchical nature of top-level design and the proliferation of “key tasks” hampers the execution of everyday business while focusing resources on key policy goals and ignoring all others.<sup>17</sup>

Moreover, the policy process in key areas (those with LSGs and/or campaigns) is designed at the top and swiftly implemented at the bottom as “top-level design” would conceive; however, this policy process loses mechanisms for feedback and reform other than citizen protest. For example, the collapse of the zero-COVID policy shows how these policies designed by top officials are enacted quickly and efficiently; however, they do

not have formal mechanisms for evaluation or feedback through local bureaucracies. Local officials are forced to implement these policies regardless of harm, until local residents protest in enough numbers to be visible. At this late stage, the central government only has the choice to either use repression or drop the policy (or both). This policy process has rapid execution for signature policies but a high possibility of “unforced errors.”

The evidence referenced in this report derives from a survey of local officials conducted in 2022. Before Wenjuanxing, a professional online survey company in China, administered the survey, I calculated the distribution of local cadres by region, age, gender, and education, to ensure a representative sample of China’s local cadres. The survey had 1,500 respondents from twenty-eight provinces.

# The Strategic Adaptation of Local Officials

These institutional changes of policy conglomeration and coordination, facilitated by the increasing use of punishment and the expanded scope of digital monitoring, increase political pressure on local officials while removing policy discretion, resulting in two main strategic adaptations at the local level: less policy experimentation and less active work styles. I first analyze the evidence for these two responses from “rule takers” at the local level and then discuss the implications of this ongoing process of change.

## Local Response: Strict Implementation instead of Policy Experimentation

The fragmentation in the governing framework created local discretion and the competitive target-based promotion system incentivized local officials to adapt or ignore central policies that might hinder promotion prospects (e.g., enforcing environmental regulations that would result in slower growth) and instead pursue novel policy experiments that might accelerate promotion.

Heilmann finds that norms of experimental policymaking derived from CCP revolutionary history were institutionalized into the PRC administration as “experimentalism” (*shiyān zhuyi* 實驗主義):<sup>18</sup>

An experimental policy process of “proceeding from point to surface” (*youdian daomian*) entails

a policy process that is initiated from individual “experimental points” (*shidian*) and driven by local initiative with the formal or informal backing of higher level policy makers. If judged to be conducive to current priorities by Party and government leaders, “model experiences” (*dianxing jingyan*) extracted from the initial experiments are disseminated through extensive media coverage, high profile conferences, intervisitation programs and appeals for emulation to more and more regions.

If successful at solving local problems, neighboring local officials might adopt and adapt these policies, and ultimately central policymakers might then integrate the local experiences back into national policy formulation.<sup>19</sup>

The extensive literature on policy experimentation provides evidence of multiple causal mechanisms, ranging from Joseph Fewsmith contending that local political needs for governability influence innovation<sup>20</sup> to Chen and Yang arguing that it is in response to concerns about party-state reputation and legitimacy,<sup>21</sup> to Heilmann positing that central officials direct these innovations from the top to gather evidence supporting preferred policies.<sup>11</sup> This variation and seeming lack of incentive for local

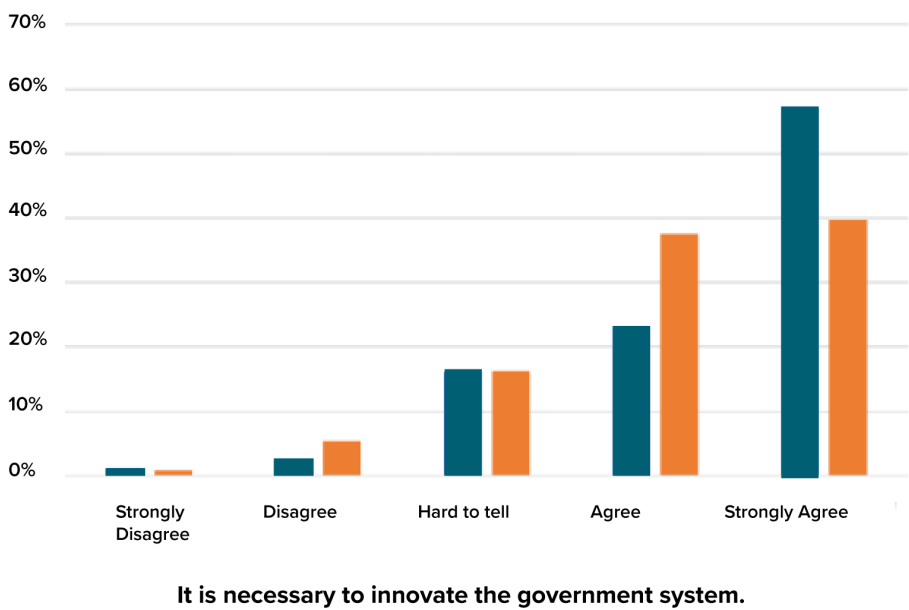
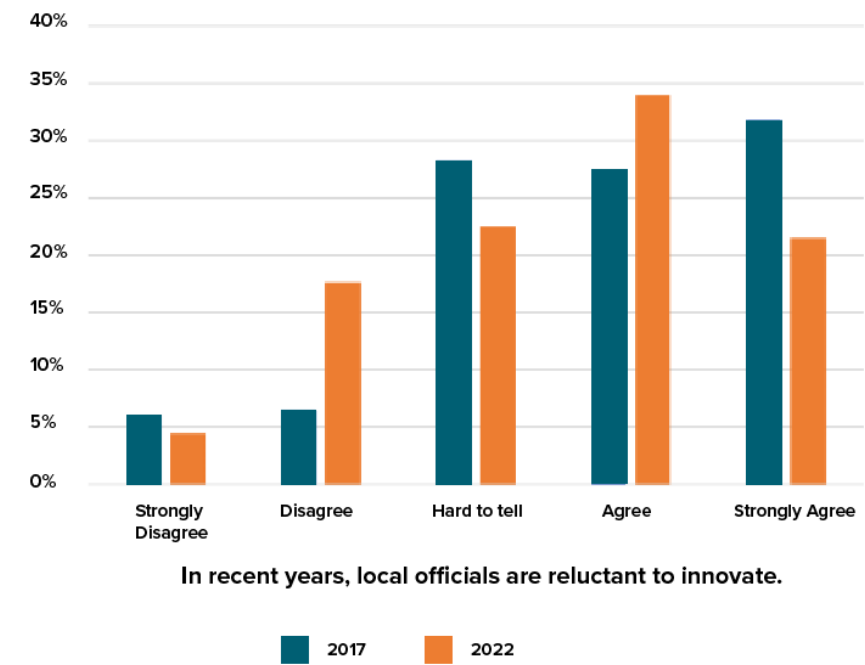
innovation suggests that multiple causal pathways might exist in different issue areas, across geography or time.<sup>22</sup> However, most scholars attribute policy entrepreneurship to either explicit or implicit incentives as a fundamental driver of experimentation, such as those in the evaluation system creating the “policy innovation imperative” for promotion,<sup>23</sup> or to a strategy signaling leadership potential in order to accelerate promotion instead of moving slowly through the provincial leadership structure and potentially aging out of the system before central promotion.<sup>24</sup>

Policy experimentation served an important role at the subnational level in China’s “authoritarian resilience,” including pilot programs on the household registration system, village and township-level elections, and social welfare programs.<sup>25</sup> Additionally, the rapid economic growth experienced by China has been attributed in large part to policy innovation and experimentation, including the Special Economic Zone pilots.<sup>26</sup> However, policy experimentation as a strategy for promotion did not always solve intended problems and sometimes wasted resources, including through embezzlement and other forms of corruption. As Heilmann, Shih, and Hofem find with their study of high-technology zone pilots, “mission drift” resulted from the discovery of “tangible economic potential (ranging from creative promotional schemes for start-up firms to opaque property deals) that had not been recognized by national policy makers beforehand.”<sup>27</sup> Despite the mixed record of effectiveness, creating and promoting policy experiments developed into a pervasive promotion tactic during the reform era.

However, scholars noted a sharp reduction in policy experimentation under Xi Jinping’s administration, with the number of provincial-level policy pilots decreasing from around 500 in 2010 to about seventy in 2016, and the share of national regulations with experimental status dropping from nearly 20 percent to about 5 percent during this time.<sup>28</sup> This change in both explicit and implicit incentives for policy experimentation results in a visible reduction in local policy innovation; however, even more significantly, a decrease in willingness to participate in even centrally designed pilots. Centrally managed pilots are designed and managed by ministries and departments to test different policy responses to the same problem, evaluate the outcomes, and select the best pilot to become national policy. Prior to 2013, local officials competed to be named a pilot city or province to secure central funding and signal their leadership capabilities as an important strategy for rapid promotion.<sup>18</sup>

I find that the institutional changes undertaken to reduce fragmentation in the system, reinforced by increasing use of punishment and digital monitoring, resulted in increased political pressure on local officials while removing their policy discretion. In response, local officials adapted to these institutional changes by reducing their willingness to experiment with policy. Policy experimentation was always risky in that officials could not predict success during the complex process of policy change; however, these experiments were viewed as a signal to central officials of leadership potential, regardless of success or failure in most cases. This was especially true if

Chart 1  
Comparison between 2017 and 2022 on Innovation Questions



officials were part of a national pilot program. Thus, the risk was minimal and the reward was substantial, so policy experiments proliferated under this incentive system. Under the new model of governance, the risk of failure and subsequent punishment has dramatically increased, and the potential for rapid promotion is no longer as clear. This has had a chilling effect on local policy experimentation. In fact, Ahlers and Stepan argue that top-level policy design appears “... to stifle innovation and to decrease effective governance. Local officials struggle to interpret central directives and live in fear of retribution for veering off the officially sanctioned path. The ongoing anti-corruption campaign is omnipresent and has led to paralysis on the local level.”<sup>29</sup>

In both this 2022 survey and an earlier survey from 2017, I asked local officials if they thought policy innovation was necessary to improve governance.<sup>30</sup> When I compare the two sets of responses, I find that local officials in 2022 agreed that innovation was necessary substantially more than in 2017; however, the rates of “strongly agree” fell and the number choosing “disagree” increased. This suggests that while policy innovation is still seen as potentially useful, there is less certainty about this strategy in 2022.

Next, to directly examine the interaction between perceived risk and willingness to innovate, we asked local officials if they would be willing to innovate if the pilot had a 30 percent chance of success, 50 percent chance, or 70 percent chance. The responses illustrate more risk aversion where local officials are less likely to innovate unless guaranteed success (more than 50 percent).

Perhaps unsurprisingly, for projects with a projected success rate over 50 percent, there was a notable uptick in cadre enthusiasm toward policy innovation across survey samples. As illustrated in table one, the mean response at 50 percent approximated three and a half, situating it between “neutral” and “likely” on the Likert scale, and this mean score escalated to roughly four and a half (between “likely” and “very likely”) when the success rate was elevated to 70 percent.

Compared to the 2017 results, the 2022 cohort evidenced slightly lower initial reluctance at 41.82 percent (45.82 percent in 2017) for projects with a 30 percent success rate. Notably, as the success rate elevated to 50 percent and 70 percent the proportion of cadres unwilling to innovate remained relatively stable at approximately 6.95 percent and 2.18 percent, respectively. In 2022, the percentage of risk-tolerant cadres willing to innovate was 59.93 percent at 50 percent compared to 89.62 percent for projects at 70 percent success rate. This trend aligns with the experimental treatment of the “bringing in fiscal revenues” vignette (2022R), although data at the 30 percent success rate suggest that cadres may exhibit lower risk tolerance specifically for fiscal revenue generation. Significantly, at the lowest risk level of 70 percent chance of success, the 2022 cadres showed more risk aversion with only 59.44 percent “very likely” to innovate compared to 74.31 percent in 2017.

Perhaps more interesting than simply comparing overall percentage responses is to examine the distribution. In chart two, I plot the distribution of responses for 2017, 2022,

**Table 2**  
**Statistical Distribution of Cadres' Response to Adopting Risky Policy Innovations\***

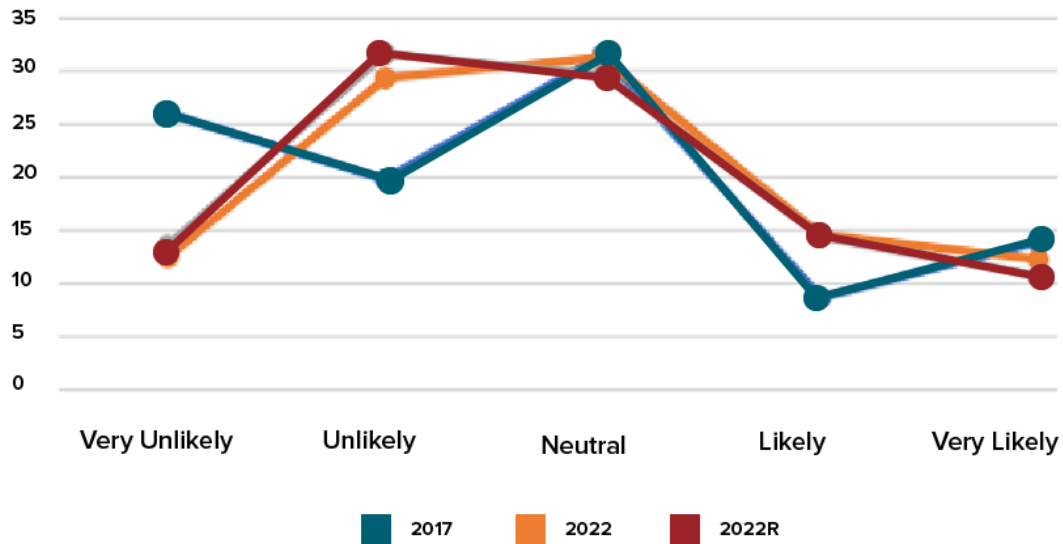
Risk Level	Year	Min	Max	Mean	Std	N
30% success	2022	1	5	2.848	1.187	1425
	2022R	1	5	2.771	1.176	354
	2017	1	5	2.647	1.326	862
50% success	2022	1	5	3.698	0.881	1425
	2022R	1	5	3.661	0.902	354
	2017	1	5	3.720	1.069	878
70% success	2022	1	5	4.465	0.752	1425
	2022R	1	5	4.472	0.738	354
	2017	1	5	4.560	0.916	872

\* In comparing cadres' attitudes toward risky policy experiments, data were drawn from the two surveys (represented in both Table 1 and Figure 1 for detailed metrics). Note that the row labeled "2010E" represents historic estimates of cadre responses from the 2022 survey, while the "2022R" row shows cadre responses that were experimentally treated with the focus on "bringing in fiscal revenue." This treatment ensures a more balanced analysis (comparing apples to apples) because the 2017–2018 survey emphasized the importance of fiscal revenue generation in the text of the question.

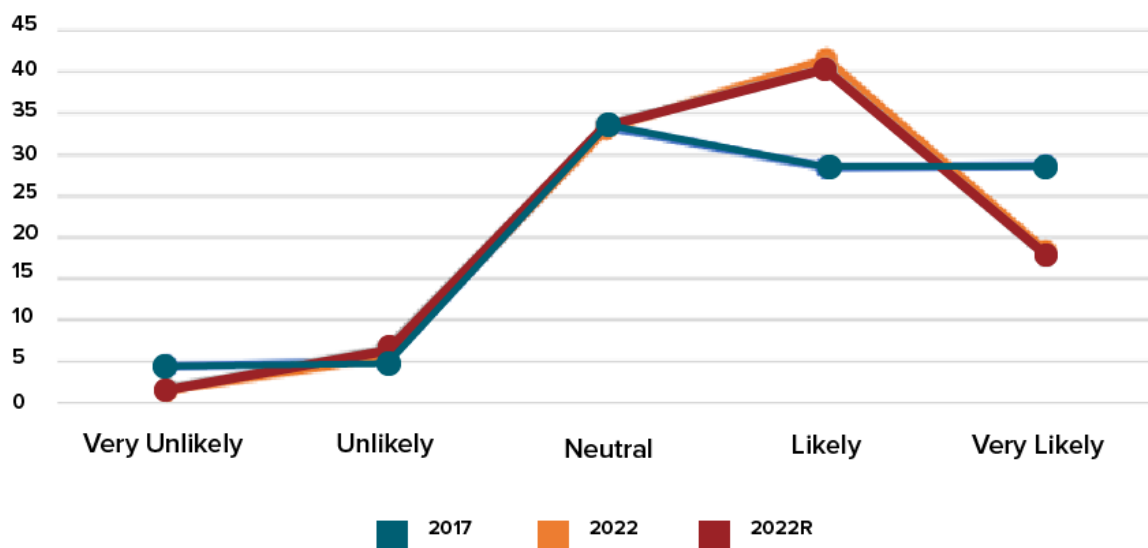
**Table 3**  
**Cadres' Response to Adopting Policy Experiment with Risk Levels (%)**

Success rate	Year	Very unlikely	Unlikely	Neutral	Likely	Very likely	obs
30%	2022	12.49	29.33	31.30	14.60	12.28	1425
	2022R	13.56	31.64	29.66	14.41	10.73	354
	2017	25.99	19.84	31.55	8.70	13.92	862
50%	2022	1.47	5.47	33.12	41.61	18.32	1425
	2022R	1.69	6.50	33.62	40.40	17.80	354
	2017	4.44	5.01	33.37	28.47	28.70	878
70%	2022	0.35	1.82	8.21	30.18	59.44	1425
	2022R	0.56	1.13	7.91	31.36	59.04	354
	2017	3.21	1.61	5.50	15.37	74.31	872

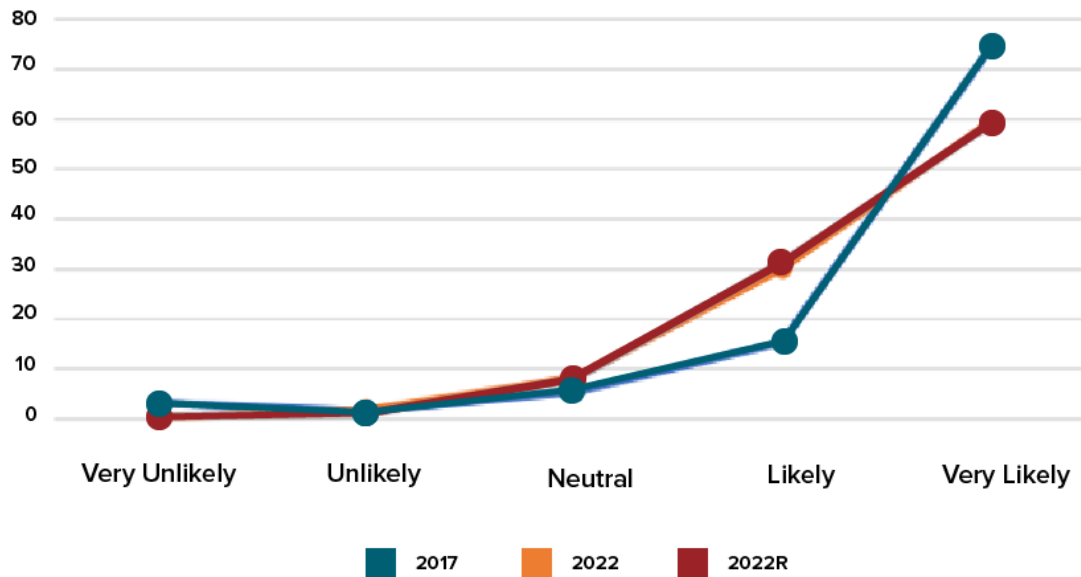
**Chart 2:**  
**Comparison of Willingness to Innovate at 30% Success Rate (Very Risky)**



**Chart 3:**  
**Comparison of Willingness to Innovate at 50% Success Rate**



**Chart 4:**  
**Comparison of Willingness to Innovate at 70% Success Rate**



be most similar to the 2017 survey question for the riskiest option of innovating with only a 30 percent chance of success. There is a clear difference between the ends of the five-point Likert scale between cadres in 2022 and 2017, with the 2022 cadres clustering closer to middle of the scale (this appears as a more standard distribution). In comparison, the 2017 cohort appears to have more variation in risk acceptance and avoidance.<sup>31</sup>

I observe a similar effect at 50 percent success rate with the 2022 cohort clustering more tightly around the middle of the Likert scale.

Comparing responses at the 70 percent success rate (the least risky option) highlights the overall risk-aversion of the 2022 cohort even more clearly. When all but promised success, the 2022 cohort of cadres is still

Given the higher risk associated with failure today, I would predict that local officials are less likely to innovate with only a 30 percent or even a 50 percent chance of success, but instead find that the overall willingness patterns are similar to those in 2017. However, cadres in 2022 are clustered more tightly around a lower risk strategy, meaning that they do not show such a wide variation between risk-acceptant and risk-averse as we observe in 2017.

Next, I asked the same question about risk tolerance, but included a treatment about willingness to innovate to improve economic development, local revenue (noted as 2022R in the above charts), public services, and to participate in a national pilot program. We find that local officials prioritize economic development when innovation is riskier (less

**Table 4: Questions 6 & 7 Willingness to Innovate (Difference in Means for Treatment Effect)**

Risk Level	Economic development	Fiscal Income	National pilot	Public service
30%	2.978	2.771	2.84	2.804
50%	3.784	3.661	3.678	3.67
70%	4.424	4.472	4.487	4.478

**Table 5: Distribution of Responses to “Implement with Harm” Question (Frequency)**

Items	N	Percentage
100% strict implementation	372	26.11
Implement without 100% efforts	230	16.14
Implementation with necessary adjustment	659	46.25
Implement to pass the evaluation	163	11.44
No implementation	1	0.07

**Table 6: Treatment Effect (Difference in Means)**

Means in implementation	Means	Std	N
Citizen discontent	2.52	0.991	354
Economic regression	2.455	0.955	354
Revenue decline	2.435	1.025	352
Cadre pressure	2.323	1.024	365

**Table 7: Local Officials’ Perceived Ideal Policy Evaluation Model: Central vs. Local**

Answers	N	Percentage
Local government conducts citizen evaluation for local policy making	304	21.33
Local government conducts citizen evaluation for upper-level policy making	722	50.67
Upper-level government conducts citizen evaluation for policy making	342	24.00
Citizen evaluation is not necessary	57	4.00
Total	1425	100.00

than 50 percent likelihood of success), but when success is guaranteed at 70 percent, they prefer participation in a national pilot program. These findings reveal a persistent bias toward economic growth as the best promotion strategy; however, when certain of success (over 70 percent), officials want to join a national pilot program to signal their leadership potential to the central government. Yu and Huang describe the new model as experimentation by “seeking approval” where “local governments tend to draft the practice proposal of an innovative intention for universal local problems first and report to upper-level governments to seek for approval; once formally confirmed and approved, this program then would be implemented by local governments.”<sup>32</sup>

These results highlight that local cadres have adapted to the institutional changes undertaken to reduce fragmentation in the system by being more risk-avoidant and less willing to experiment with policy. Top-level design rhetoric emphasizes the role of local officials as “strict policy implementers” rather than policymakers, and our survey results show that message has been received. Although many local officials remain interested in policy innovation as illustrated in chart one, they are hesitant to act even as the likelihood of success increases.

Moreover, local officials show signs of trying to eliminate “policy implementation gaps” in key policy areas. To measure this shift in policy role, I asked local officials how they would respond to pressure to strictly implement policies, even if they know they will be harmful. As shown in table five, we find that 37.6 percent of surveyed local officials

would fully implement central policies even if they knew it would harm their communities. However, we still see vestiges of the former role of local officials as informal policy makers through their implementation powers when 46.3 percent report that they would try to adjust the policy to avoid harm, and 16.14 percent would try not to fully implement the harmful policy.

To evaluate how different types of harm might create countervailing pressures on local officials to not strictly implement central policies, I asked an experimental question with four different treatment effects where we specified the harm as “citizen discontent,” “less economic growth,” “decline in local revenue,” and “cadre pressure.” In table six, we can see that “citizen discontent” is the biggest cause of local officials not being willing to strictly implement policies.

Interestingly, these results reveal that the “local responsiveness” as a consequence of the Fragmented Authoritarian framework persists.<sup>33</sup> Local officials are under pressure to strictly implement central policies; however, they are also afraid of creating social unrest. These findings are similar to Wang and Han who find that, when responding to citizens, the Chinese government is often driven not only by concerns over threats such as collective action or legitimacy erosion, but by cosmetic needs to project a responsive image to please superiors or appease the public.<sup>34</sup> Additionally, I find some evidence that local officials might strategically use social unrest and citizen feedback to push back against undesired central policies. As illustrated in table seven, most respondents prefer to have locally organized citizen

evaluation for upper-level policymakers (50.67 percent) rather than having citizen feedback on local policymakers.

In total, the survey results show that in response to increased political pressure with reduced policy discretion, local officials adapted by being less willing to experiment with policy and focusing instead on strict policy implementation of central regulations. This leads to a role of more direct policy implementation as the perceived risk levels become too high, instead of the former role of policy innovation and local adaptation. In addition to the perceived risk of experimentation and encouragement of strict implementation, local officials report a substantial increase in the number of work reports filed with supervisors who are concerned with meeting new guidelines for central supervision. For example, one county-level official previously engaged in policy experimentation complained that he no longer had time to analyze problems and develop solutions, but instead had to focus on constantly filing work reports with supervisors in what he described as a “work report culture.”<sup>35</sup> Filing work reports as a major component of daily work represents another risk-mitigation strategy, as we discuss next.

### **Local Response: Formalism instead of Participatory Governance**

Previously, the fragmentation in the governing framework created local discretion, and the competitive target-based promotion system incentivized local officials to solve local problems, including by adapting or

ignoring central policies that might hinder promotion prospects (e.g., enforcing environmental regulations that would result in slower growth). Moreover, many lower-level governments were expanding institutions like elections that also encouraged more community-based action.<sup>36</sup> In addition to career pressures encouraging resolving local problems, local governments often did not have strong regulatory capacity or accurate information from businesses or citizens. This context catalyzed an active work style for local officials that created a form of participatory governance whereby officials did not govern from desks, but rather engaged in site visits<sup>37</sup> and other tactics for deliberation and mediation (see Wang Yang’s personal mediation of Wukan protests in Zhou and Banik).<sup>38</sup> Without strong regulatory capacity or authority, local officials relied on building strong connections across business and society and using these connections to accomplish goals.<sup>39</sup> This process unfortunately generated endemic corruption but also allowed businesses, organizations, and citizens easy access to local policymakers to share ideas and feedback.<sup>40</sup> Baogang He called this form of participatory governance “authoritarian deliberation” and theorized that it led to better policy making outcomes.<sup>41</sup>

However, in response to the two main changes to Chinese governance identified in this report, local officials increasingly are no longer engaging in this more active community-based work style. The first change is to the policymaking process whereby local governments lack the authority to design new policies. The second change is to the personnel system where promotions

are decided based on more quantitative measures of procedure rather than outcomes, and the use of punishments has increased. These two factors interact when local officials do not have the authority (or capacity) to address a problem or change a policy but are being evaluated by its success including preventing “social unrest.” This is a challenging position of being squeezed by unreasonable demands from above and below, as more emphasis is placed on “responsive governance” (service-oriented governance). In combination, these changes engender a situation of higher risk and uncertainty, and instead of solving problems by any means necessary, local officials engage in “work-report culture” that focuses more on documenting the process of governance rather than the outcomes.

Many local officials have adapted by embracing the safe strategy to not risk trying to solve problems proactively, but to wait for direct orders and then to file work reports, or what is criticized as “formalism” (*xingshizhuyi* 形式主). Xi’s campaign against it in 2018 defined it as using “flamboyant forms to replace concrete implementation (*yong honghonglielie de xingshi daitile zhazhashishi de luoshi* 用轰轰烈烈的形式代替了扎扎实实的落实)” or “pursuing forms and not effects (*zhuiqiu xingshi, bu zhong shixiao* 追求形式, 不重实效),” meaning that instead of going out into the community to engage in policy implementation and enforcement, local officials remain in their offices to work on “mountains of documents and oceans of meetings (*wenshanhuihai* 文山会海).”<sup>42</sup> As the Director of the Institute of Political Science at the Chinese Academy of Social Sciences (CASS) asks: “Without support for

policy implementation, how can there not be formalism?”<sup>43</sup> Thus, the risk-mitigation strategy of “work-report culture” shifts the emphasis to documenting procedures rather than actually implementing policy,<sup>27</sup> and enforcing regulations.<sup>44</sup> Using the example of the poverty-alleviation campaign, officials were careful to strictly follow and document procedures: “Local officials were careful to keep physical proof of the activities of the implementation process including forms, signatures, and photos so that they would be able to cope with inspection from above and avoid accusations of bypassing necessary procedures.”<sup>45</sup> Village cadres often complained to the authors that the task of completing large numbers of complex forms was so onerous that it distracted them from providing actual assistance for poor households.” Zeng blames this outcome on an important mechanism of “top-level design” where control is mainly procedural, whereby local officials are required to follow the process stipulated in policy documents and maintain written records of each step.<sup>37</sup> Compared to measuring outcomes that are influenced by a complex array of factors and might take a long time to see significant change, compliance with procedural requirements is relatively easy to verify.

Ding and Thompson-Brusstar also argue that this battle against “formalism” and “bureaucratism” (*guanliao zhuyi* 官僚主义) is structural, that an “anti-bureaucratic ghost dwells in the machinery of China’s bureaucratic state,” and that these critiques of bureaucratism and formalism unfold in parallel fashion with efforts to standardize and institutionalize the state.<sup>46</sup> As Xi’s governance reforms increased the risk of

**Table 8: Rank Order of Local Officials' Sources of Pressure**

Items	Top 5/Percentage	Top 5	Top 3	Top 1
Conflicted responsibilities	0.689	982	633	189
Assigned performance targets	0.605	862	581	209
Lack of resources	0.536	764	391	123
Making mistakes and facing accountability	0.499	711	413	146
Interference from above	0.406	579	350	102
Maintain relationships with leaders	0.404	576	329	93
Long working hours	0.380	542	334	130
Competition with neighboring areas	0.369	526	291	94
Mass Resistance	0.345	492	342	145
Politically correct	0.278	396	231	81
Bureaucratic Resistance	0.269	384	193	42
Monotonous work	0.218	311	187	71

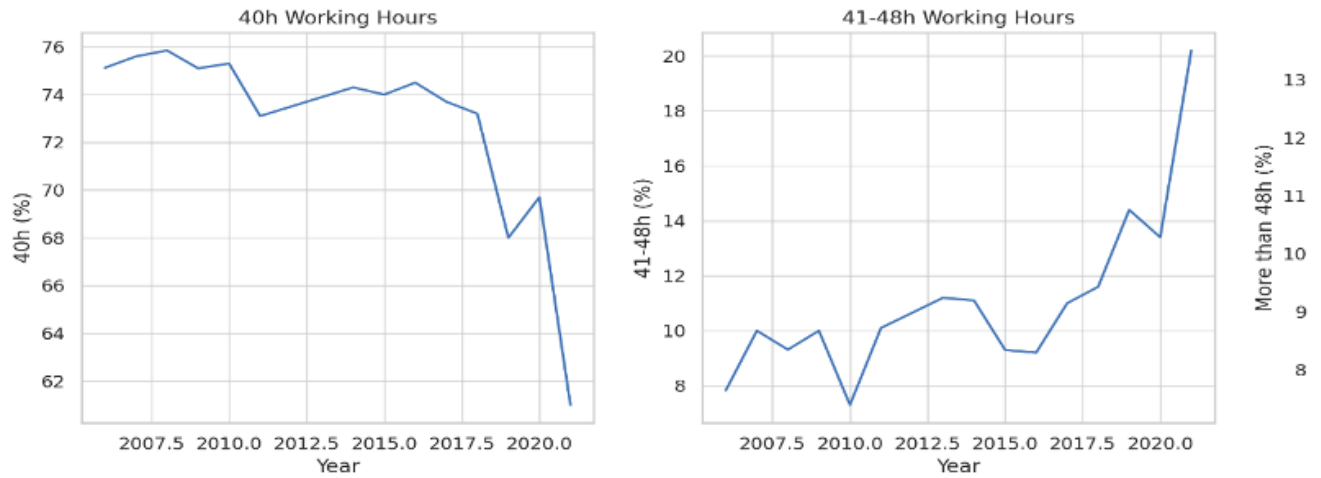
Note: respondents ranked these options in order of importance, and the first column shows the percentage of respondents who picked each choice in their top 5 choices. The subsequent columns show how many respondents picked each option in their top 5, top 3, or first choice.

punishment and uncertainty of the priority of often competing goals, they simultaneously decreased discretion in the policy process at the local level. This combination of increased risk coupled with less authority has resulted in risk-mitigation strategies of focusing on not taking initiative to solve local problems and on documentation versus action.

The fear of making mistakes causes different behavior than striving for rewards like promotion.<sup>47</sup> Chen, Keng, and Zhang find that Xi's governance reforms, including increased rates of punishment, caused "bureaucratic slack" or shirking; however, although the outcome was similar, various aspects of reform impacted each level differently with higher-ranked officials more discouraged by increased risks.<sup>48</sup> Following the logic of "the more you do, the more mistakes you will make" (*duozuo duocuo* 多做多错), local officials may focus on documentation of procedures rather than the substance of the policy goals. In fact,

Zhu finds that 50,527 of 119,224 sanctioned officials in 2020 were punished for shirking or "lazy governance (懒政怠政 or 懒政)."<sup>49</sup> Although the Party has increased digital monitoring of local noncompliance or shirking, as we discuss in chapter five, this is often based on filed work reports,<sup>50</sup> and Tu and Gong find that "flagrant shirking" is replaced by more subtle tactics of blame avoidance, such as playing it safe or fabricating performance information.<sup>51</sup>

In addition to increasing risk, local officials are often genuinely uncertain as to the priority of policy goals when they conflict given the proliferation of quantitative targets and increase in punishment for mistakes.<sup>52</sup> Previously, local officials understood that performance evaluation was almost entirely based on local GDP, and although this caused a "growth at all costs" mentality that created environmental damage and income inequality, it also helped local officials determine priorities.<sup>53</sup> Under President Xi's

**Chart 5: Reported Working Hours of Local Officials****Chart 6: Distribution of Filing Work Report**

Source	SS	df	MS	Number of obs	=	1,340
Model	2336.89876	10	233.689876	F(10, 1329)	=	2.42
Residual	128466.906	1,329	96.6643389	Prob > F	=	0.0075
				R-squared	=	0.0179
				Adj R-squared	=	0.0105
Total	130803.805	1,339	97.6876813	Root MSE	=	9.8318

Q21_paperw~k	Coefficient	Std. err.	t	P> t	[95% conf. interval]	
age	-.1663743	.0476297	-3.49	0.000	-.259812	-.0729366
male	-.1358384	.5552537	-0.24	0.807	-1.225108	.9534309
minority	-.2137055	1.246734	-0.17	0.864	-2.659487	2.232076
ccp	1.088941	.6775402	1.61	0.108	-.2402243	2.418106
edu	-.4828185	.5192635	-0.93	0.353	-1.501484	.5358469
posrank	-.1546025	.2933505	-0.53	0.598	-.7300831	.4208781
leader	.8384261	.7419298	1.13	0.259	-.6170551	2.293907
govlevel	.7230237	.3401761	2.13	0.034	.055683	1.390364
native	.1436967	.2815055	0.51	0.610	-.4085468	.6959403
rotation	.0751095	.3203088	0.23	0.815	-.5532565	.7034754
_cons	19.75944	2.335511	8.46	0.000	15.17776	24.34113

**Table 9: Perceived Morale of Local Officials**

Question 19	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
如果有机会，我会辞职到体制外寻找新的发展。 If I had the opportunity, I would resign to seek a new position outside the system.	272	363	354	234	202
我希望我的孩子也能成为党政系统的领导干部。 I hope my children will also become leaders in the party and government system.	72	121	439	385	408

reformed evaluation system, local economic growth is no longer the single most important factor in evaluations leading to local officials facing the responsibility of accomplishing multiple competing objectives, and successfully accomplishing one might cause a lower score on another indicator. When multiple and conflicting policy objectives have equal weight in the performance evaluation system, the strategic response is to file work reports rather than act and make a mistake. As illustrated in table eight, local officials complain that the policy goals often conflict with each other, and the performance targets are overly quantitative and do not accurately measure local efforts.

With limited resources and a growing number of tasks at the local level, cadres are exhausted and afraid of making a mistake. Local officials report working on average 52.6 hours per week, which is up substantially from previous years as illustrated in chart five.

These tired cadres worry about making a mistake and being punished, thus catalyzing the adaptive strategy of filing procedural work reports. To measure the use of this strategy, I asked questions about both the quantity and perceived purpose of work

reports (Question Twenty-One: 文书工作) in our survey. I find that on average, respondents spend sixteen hours out of a forty-hour work week (40 percent of their time) filing work reports. As illustrated in the regression analysis in chart six, the amount of time spent filing reports is significantly related to the government level, so that those who work at the higher government level spend more time on this.

When asked about the perceived purpose of work reports, the number one selected purpose was for upper-level authorities to evaluate work (决定上级对本单位的评价) and the second reason was it is the “most important work” that local officials do (是最重要的工作). This shows a shift in the behavior of local officials toward a more risk-avoidant strategy.

## Discussion: Strategic Adaptation and Uncertainty

The institutional changes undertaken by Xi to reduce fragmentation in policy making interact with increasing punishment in the personnel system, creating intense political pressure on local officials while removing their policy discretion. As a result, local cadres who serve as the frontline of the Party-State currently report low levels of morale. Table nine illustrates that respondents selected the “neither agree nor disagree” option for both morale questions, contrasting with similar questions in prior surveys that showed high morale. Despite low morale, a record 2.83 million applicants applied for 39,600 civil-service positions in 2023. High levels of unemployment and the crackdown on financial/education technology companies have created a paradox of record numbers applying to work for the local government, but not finding that work meaningful once employed.

The high levels of uncertainty illustrated in table nine by respondents selecting the option of “neither agree nor disagree” highlight the rapid and unprecedented changes in the governance system. Institutional change creates a great deal of uncertainty where former models no longer work, but people are not yet sure of the best new way to do things. In this uncertain environment of high pressure and perceived risk, the strategic adaptations by local officials make sense. However, this new system has both strengths and weaknesses: namely that it results in reduced “policy implementation

gaps” in key policy areas and less space for corruption or wasteful projects, but also in less policy experimentation to solve local problems and reduced ability for local officials to serve as the key feedback mechanism for the effectiveness of policies. This type of active governance encouraged local officials to view themselves as policy entrepreneurs and problem solvers, which is now being replaced with low-ranking bureaucrats in an “iron cage” who are risk-avoidant and focused more on procedures than outcomes.

As China faces a new stage of economic reform necessary to grow out of the middle-income trap and reduce high unemployment. This requires innovation, adaptability, and indigenous knowledge, and thus this more rigid bureaucracy might become a liability that hinders future economic growth. Additionally, as governance challenges emerge, local officials will wait for central solutions rather than proactively responding to these nascent problems, undermining the foundations of the “authoritarian resilience” China has enjoyed during the reform era. If Xi cannot build in new mechanisms for more local policy autonomy, the chance to successfully transition to the next stage in economic reform is increasingly uncertain. Slow economic growth closes off the ability for the Party to continue to reduce poverty and increase social welfare through the “common prosperity” policy, and creates social unrest as migrants are forced from cities back into underdeveloped rural towns,

and students with college degrees face a future of unemployment/underemployment.

This potential future for China also creates a complex challenge for US policymakers if Chinese leaders face increasing domestic instability and slowing growth. Often political rhetoric seems to suggest that any challenge or failure for China is a win for the United States; however, there are many possible scenarios where a struggling China creates new problems for US foreign policy in the region. For example, does an increasingly fragile regime try to reincorporate Taiwan or become increasingly aggressive in the South China Sea to shore up domestic support? As observed with Russia under President Vladimir Putin, leaders faced with the potential of regime decline often strike out in unpredictable ways. Conversely, a stable and growing China is more likely to focus on achieving foreign policy goals with long-time horizons leading to peace in Asia. Thus, the continued evolution of local governance is of importance in both China and the United States. 🦋

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