PENN PROGRAM ON REGULATION

What Regulators Need to Know About Organizational Culture

Jennifer Howard-Grenville
University of Oregon Lundquist College of Business
University of Cambridge Judge School of Business

Stephanie Bertels
Simon Fraser University Beedie School of Business

Brooke Boren
University of Oregon Lundquist College of Business

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University of Oregon Lundquist College of Business
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Executive Summary

Organizational culture, often thought of as "the way we do things around here," is both a highly valued and poorly understood characteristic of organizational life. Managers and employees recognize and value the importance of organizational culture to the effectiveness, productivity, and satisfaction of employees, and their achievement of organizational goals. Cultures that are mindfully managed can set organizations apart from their peers in their ability to attract and retain talent, and enable organizational adaptation. Yet, organizational scholars caution that creating a culture to attain these outcomes is a complex and subtle task, requiring sustained effort because organizational cultures are typically "deep, pervasive, [and] complex" (Schein, 2010: 53).

Our aim in this paper is to explain the various ways in which organizational culture has been conceptualized and its influences understood, so that we can offer suggestions for how regulators can responsibly evaluate and manage the culture of their own organizations in the pursuit of regulatory excellence. Perhaps the single most important, and disarmingly simple, lesson from this paper is that organizational culture, like any other aspect of organizing, needs explicit, mindful tending.

Organizational culture has been conceptualized and explained in different ways. According to three main perspectives, culture can be understood as: 1) shared values; 2) cognitive frames through which people see the world; and, 3) repertoires of actions that people use in patterned ways. Each of these perspectives provide distinct – but complementary – lenses through which to understand culture and guide organizational decisions.

We offer a composite definition of culture that draws from elements of each perspective: *Organizational culture comprises sets of beliefs held by an organization's members, as well as associated actions that are guided by and sustain these beliefs*. Beliefs are shared conceptions held by organizational members of what is important or what is valued within the organization and between an organization and its constituents. Actions are essential to understanding culture for these are where beliefs are put into motion. People at all levels must "walk the talk" for an effective, coherent culture to exist. Skillful managers and employees can put culture to work by

revising which actions are associated with core beliefs, or by reframing how people see certain issues, enabling gradual adaptation of culture over time.

Organizational cultures are not necessarily unified, even within the same organization. In fact, almost any organization will to some degree exhibit multiple cultures, or subcultures; organizational culture rarely reflects the unified ideal often represented in lay accounts. This is especially true in organizations following mergers or acquisitions, but it can also arise with organizations populated with individuals from different professional or occupational backgrounds. As a result of such factors, cultures can vary in their degree of integration or differentiation. Some organizations may be entirely fragmented, as when the organization exhibits very little consensus on values, beliefs, and actions. To be most effective, the degree of differentiation in an organization's culture should ideally be aligned with and support organizational goals. For some organizations, the most effective culture will be one that is highly unified and generates consistent patterns of action across units and among employees; for other organizations a culture that is differentiated around several goals, or constituents, will be more suitable; or, for others still, a culture that is adaptive (a "learning organization") and in flux will be best. The degree of differentiation holds implications for organizational change and performance. Some recent research, for example, suggests that at least in competitive business environments highly adaptable cultures tend to perform better.

A number of tools have been developed and used for assessing and guiding culture. For example, surveys and checklists can be useful for gaining an overall understanding of an organizational culture, comparing it with that of other organizations, categorizing it, and gaining insight into employee satisfaction with culture. But such tools are limited and there exists no single formulaic tool for measuring, maintaining, or changing organizational culture. A more nuanced understanding of culture must be pursued, one that demands several forms of assessment that can tap into employees across an organization, comparing their cultural knowledge or practices, and which likely will involve data collection via a combination of surveys, interviews, focus groups, and observation. Several promising tools for "cultural pulse taking" exist to help managers assess their organization's culture and their employees' readiness for change.

The cultures of regulatory organizations possess distinct features that pose special challenges for organizational management. These challenges include the limited control regulatory organizations have over their goals, the presence of strong professional subcultures, and the nature of the interaction between the regulator's organizational culture and those of the regulated organizations. One key task of a regulator is to influence and shape the cultures of regulated organizations so that they better advance policy goals. As a result, regulatory leaders confront a nested, interrelated challenge of trying to manage their own organizational culture in ways that enable them to both infer and influence the cultures of regulated firms' cultures.

Our comprehensive overview of the scholarly work leads to several high-level lessons for regulatory managers seeking to guide and change their organizational culture. The most salient lesson is that organizational culture, like any other aspect of the regulator's environment, needs explicit, mindful tending if its leaders are to maximize the alignment of culture with organizational goals. Without this, culture takes on a life of its own and can strongly guide how

people act, whether this is in line with organizational priorities or not. To guard against this, managers should take the following steps:

1. Articulate clearly the high level elements of the organization's culture, which means communicating beliefs and translating these into desired actions at every level.

2. Ground their aspirations for culture not just in an ideal but also in reference to a solid understanding of the organization's history, its internal divisions, multiple goals, and prior cultural commitments.

3. Ensure that actions at every level reflect and reinforce the desired culture; cultural change will falter if people say one thing yet act differently.

4. Undertake efforts to guide or shift a culture with a long-term view, as cultural change is ultimately about altering people's familiar patterns of action, which can be both threatening and highly prone to regression.

Ultimately, a patient approach which regards the ideal culture as coherent yet likely somewhat differentiated, rather than uniform across an organization, is the most realistic and valuable approach to guiding and managing culture and cultural change in regulatory organizations.

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"A recent Deloitte survey showed that 94 percent of executives believed that a strong culture was important to business success. But if you asked them who was responsible for managing culture or how they would manage it, most wouldn't have a clue."

Charles O'Reilly, organizational scholar quoted in Holton (2014)

What is organizational culture? And how does it influence the ability of an organization to meet its goals and performance expectations? Culture is perhaps one of the most-invoked explanations for "how things work" in organizations, yet it is also frequently one of the least well-defined and understood. In fact, culture is often the explanation invoked to "explain the unexplainable." Yet, managers and employees alike value culture and seek to build or gain employment in certain kinds of organizational cultures. Strong cultures are typically connected with superior organizational performance and high levels of employee productivity, commitment and satisfaction. Strong cultures might also set organizations apart from their peers in their ability to attract and retain talent, and enable organizational adaptation (Peters & Waterman, 1982; Kunda, 1992; Chatman & Cha, 2003; Schein, 2010; Ortega-Parra & Sastre-Castillo, 2013). Scholars are quick to warn that creating a culture to attain these outcomes is a complex and subtle task, requiring sustained effort (Chatman & Cha, 2003; Jaskyte, 2004; Cha & Edmondson, 2006), because organizational cultures in reality tend to be "deep, pervasive, complex, patterned, and morally neutral" (Schein, 2010: 53). Nonetheless, mindful attention to culture can aid organizations in their pursuit of goals and enable adaptation. Our aim in this paper is to lay out the various ways in which organizational culture has been conceptualized and its influences understood, so that we can offer suggestions for how regulators can responsibly evaluate and manage the culture of their own organizations in the pursuit of regulatory excellence.

I. Defining Organizational Culture

Summary: This section introduces the concept of organizational culture and defines it to encompass both beliefs and actions by the members of an organization.

In common parlance, culture is "the way we do things around here" and it gains its power from its ability to bind organizational members in working towards shared goals and normatively enforcing those efforts. Consider a private-sector example of Nordstrom, a U.S.-based

department store, lauded for its highly effective culture emphasizing customer service (Chatman & Cha, 2003). Employees at Nordstrom are given a single card titled the "Employee Handbook," which reads "We have only one rule… use good judgment in all situations." In contrast to reliance on formal, rules-bound procedures, cultures operating on such premises focus on ensuring that organizational goals are met, while employee autonomy and professionalism are respected and celebrated. Further, peer enforcement of transgressions replaces some degree of managerial oversight, such as when a salesperson scolded his colleague for not working hard enough to source a customer's desired shoes from a competitor and thereby send her away delighted with her Nordstrom's experience.

Other examples exist of cultures that extract high levels of employee performance towards organizational goals, and commensurately produce high levels of employee autonomy, creativity, and satisfaction. Southwest Airlines, the only consistently profitable U.S. airline, is recognized for its team-oriented culture, which enables it to turn around aircraft at the gate faster than its competitors, and with an emphasis on employee customer service, creativity, and fun. WestJet, a Canadian airline, emulated many aspects of the Southwest model and has been recognized as a J.D. Power Customer Service Champion (WestJet, 2015) and as having one of Canada's Most Admired Corporate Cultures (one of only 6 organizations to receive the award 4 times) (WaterStone, 2015).

While the Nordstrom and Southwest/WestJet examples point to cultures that enable discretion in the pursuit of organizational goals, other organizations in fields like energy and healthcare have made investments in establishing what have come to be called "safety cultures" (International Nuclear Safety Advisory Group, 1991) or "just cultures" (Reason, 1997). Just cultures aim to promote incident and error reporting wherein employees are encouraged and even rewarded for error reporting and are not punished for mistakes, but where serious negligence, deliberate violations, and destructive acts are not tolerated.[1]

Together, these various examples suggest that the cultivation of an organizational culture is important for a number of facets of organizational performance, and that the "right" culture can be an effective substitute for, or complement to, other managerial tools like rules, procedures, or direct oversight. But, how do organizations create such cultures? What aspects of culture are the right ones to cultivate? What outcomes can realistically be obtained? And, what can managers do to support such cultures through procedures and leadership practices? The answers are not as straightforward as they might seem, given the variety of ways in which culture has been conceptualized and enacted, and the challenges of connecting any given organizational outcome to a single, even complex, cultural construct. Nevertheless, a great deal of academic work has been done on organizational cultures and our purpose in this paper is to provide an overview of the main findings, considerations, and suggestions for evaluating and evolving cultures.

We begin by offering a definition for organizational culture based on our own research as well as a review of the literature:

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[1] Regulators have sometimes sought, for example, to inculcate just cultures within regulated organizations to enable employees to speak up and protect whistleblowers from retaliation (Michaels, 2014).

Organizational culture comprises sets of beliefs held by an organization's members, as well as associated actions that are guided by and sustain these beliefs. Organizational culture underpins day-to-day actions in an organization, but can also be put to use as a tool for adaptation by culturally skillful managers and employees.

Beliefs are shared conceptions held by organizational members of what is important or what is valued within the organization and between an organization and its constituents. We prefer the term "beliefs" to the oft-used term "values" when talking about culture, because beliefs connote patterns or regularities that are associated with action, while values are not necessarily good predictors of action (Giorgi, Lockwood, & Glynn, 2015; Lamont & Small, 2008). In our definition, beliefs and actions can be thought of as two sides of the same coin: beliefs guide actions, whereas actions reproduce beliefs. This is not to say that one can reduce belief and action to the same thing. Instead, consistent with practice theory (Feldman & Orlikowski, 2011), belief and action are mutually constitutive of each other. This means that each "feeds" and potentially reinforces the other. Conversely, beliefs and actions can diverge temporarily, enabling adaptation or improvisation of culture in new circumstances. For example, the same belief ("we are an innovative organization") might come to be associated with new ideas, through improvisation with new actions ("innovative actions include those that improve our product's environmental footprint"). If belief and action diverge more permanently, a misfit between what the culture espouses and what people do arises – in other words, organization members fail to "walk the talk." An authentic, coherent culture is one in which actions and beliefs are experienced as more or less in alignment with each other most of the time.

The lack of a *coherent culture* – that is, mutually-reinforcing actions and beliefs – that aligns with organizational goals is a far greater deficiency than is the lack of a *certain type* of culture. While certain types of cultures – strong cultures, high commitment cultures, or "fun" cultures – are lauded in the popular press, the reality is that all organizations have cultures, whether positive, neutral, negative or mixed. In fact, efforts to create a strong, high commitment culture can lead to backlash and hypocrisy (Kunda, 1992), while negative, unpopular cultures may bind their members equally as strongly as positive, popular cultures do (Weeks, 2004). Clear and consistent communication about cultural beliefs and consistent enactment of practices in line with those beliefs can elicit behaviors that are in line with strategic goals (Chatman & Cha, 2003; Howard-Grenville & Bertels, 2012). The challenge for organizational managers, then, is not so much about what *kind* of culture to have, but to understand what kind of culture the organization *does* have, and how managers, leaders, and employees can steer that culture to best *align* with, and hence contribute to achieving, desired organizational goals. In most organizational settings, this challenge is made more complex and subtle through the fact that organizations typically have multiple subcultures (Howard-Grenville, 2006; Meyerson & Martin, 1987), not to mention multiple goals which are themselves imperfectly aligned.

In this paper, we first introduce three perspectives on organizational culture to explain how it has been conceptualized in the academic literature, and we reflect on the implications of each of these perspectives for the evaluation and management of culture. Next, we explore some common concerns and considerations specific to managing culture in the face of organizational challenges, including mergers. Then we offer a number of ways of thinking about cultural

assessment and guidance and explore their potential application. Next, we offer some insights into how regulatory leaders might need to adapt some of the findings on organizational culture, built predominantly on studies of private, for-profit organizations, to accommodate some specific features of regulatory agencies. Finally, we conclude with some overarching lessons for managing and guiding culture.

II. Three Perspectives on Organizational Culture

Summary: This section presents three different ways to think about organizational culture and explains what each view lends to your understanding of your organization's own culture.

As mentioned, definitions and understandings of organizational culture vary. We review three main ways organizational culture has been conceptualized in academic literatures, noting that they are not necessarily mutually exclusive, nor competing. Like viewing the interior of a house through several windows that afford slightly different views, each perspective can help us build a more complete picture of the whole "house" (or culture). Each emphasizes specific aspects of culture and hence foregrounds particular implications for thinking about how culture is established and managed. These three perspectives also offer something of a chronological development of the concept of culture in organizations and hence also demonstrate one reason why culture can often be a confusing topic of discussion. Confusion can arise when people hold different, though legitimate perspectives on what culture *is*, and thus how to assess, alter, and even perhaps measure it. We also present the perspective that most aligns with our current understanding of culture, the "repertoire" perspective, which holds promise for understanding organizational cultures as both powerful and malleable, and as navigated and used by members across all levels of the organization. This "repertoire" perspective aligns with the definition for organizational culture we offered in the introduction because it attends to people's actions and how these underpin and uphold beliefs. Prior to discussing it more fully, we present two perspectives that have been popular in the management literature for a considerable period of time, culture as values, in Section 2.1, and culture as a frame, in Section 2.2. We discuss the "repertoire" view, in Section 2.3. Later in the paper we revisit these perspectives as we explore how they been taken up in various tools for assessing culture and managing cultural change.

A. Culture as Shared Values

Culture was initially conceptualized and is perhaps still most frequently refered to in lay conversation as a set of *shared values*, which underpin organizational members' actions and thus serve as an informal control mechanism (Martin, 2002; Ouchi & Wilkins, 1985). According to this perspective, peoples' actions are guided consciously and subconsciously by a set of values, often determined by organizational leadership, who decide "how things should be done" in the organization (Smircich, 1983). Accordingly, culture is viewed as a stabilizing and unifying force, aligning what people do with the values organizational leaders espouse. Often, these values are documented and disseminated throughout the organization by leaders, and included in mission statements, performance reviews, and behavioral checklists (Schein, 2010). Values can become taken for granted "assumptions" (Schein, 2010), such that they guide organizational member actions even without conscious attention to them. Values work in concert with other elements to comprise a culture. Giorgi et al. (2015:8) explain:

Once organizational values are validated – mostly as a result of organizational survival – they become taken for granted assumptions (Meyerson & Martin, 1987; Schein, 1985; Selznick, 1957) which are transferred to newcomers via socialization (Van Maanen, 1978). Rituals, practices, artifacts, and traditions play a significant role in reproducing existing values and socializing others (Alexander, 2004; Schein, 1985; Trice & Beyer, 1984).

Schein's three-level model of culture holds a central role for values, in close relationship to the other two levels, *artifacts* and *basic assumptions* (Schein, 2010). The term "levels" is used intentionally, for artifacts refer to highly observable, surface-level, physical, social, and linguistic manifestations of a group's shared experience. These include familiar aspects that many people would associate with an organization's culture, including forms of dress, physical layout, language used between members, material artifacts like products or technologies, and myths, stories and rituals that circulate within the organization. Yet, these artifacts may be inaccurate signals of the organization's real culture, which is only captured in the deepest possible level of basic assumptions. Basic assumptions are "unconscious, taken-for-granted beliefs and values" that "determine behavior, perception, thought, and feeling" (Schein, 2010: 24). Assumptions are highly unifying and promote very little variation in behavior within a culture. For example, Schein writes, "if a basic assumption comes to be strongly held in a group, *members will find behavior based on any other premise inconceivable*." (2010: 28; emphasis added). Espoused values, in Schein's model, reside on the level between artifacts and assumptions, and are *socially validated* expressions of an organization's ideals, goals, aspirations and rationalizations. In other words, to be culturally meaningful, values are not simply stated but must have been deemed to work and stood the test of time. Values that are accurate expressions of a group's basic assumptions should be discerned from those espoused values that represent desired future aspirations (Schein, 2010).

When culture is viewed through the lens of shared values (or assumptions), organizational leaders will often create incentives, strategic goals, and policies aimed at fostering behaviors aligned with the desired cultural values (Howard-Grenville & Bertels, 2012; Schein, 2010). Schein (2010) suggests that organizational cultures can be categorized into typologies, associated with particular sets of underlying values, such as authority- or power-oriented, or achievement- or support-oriented (Harrison, 1979). Schein (2010) emphasizes that organizational leaders can direct organizational culture toward one typology or the other through their level of involvement in establishing and enforcing cultural values, hiring individuals who align with the espoused values, and socializing all organizational members to espouse and enact the desired values. In this way, the values perspective presents an image of organizational culture as highly integrated, with organizational members' values and behaviors being closely aligned with leadership's espoused values (Martin, 2002). However, many cultures are, in reality, more complex and differentiated, as occupational and geographical differences introduce perturbations (Schein, 2010). As well, taking values as the primary basis for culture can be misleading because values do not always trigger the intended behaviors, and at times even produce the opposite (Jaskyte, 2004; Cha & Edmondson, 2006; Lamont & Small, 2008). For instance, although we typically associate charismatic leadership with heightened positive experiences for employees, Cha & Edmondson (2006) found that charismatic leaders can also unintentionally produce

disenchantment on the part of employees when such leaders are perceived to be inauthentic. Similarly, high commitment cultures can breed employee burnout and cynicism (Kunda, 1992).

B. Culture as Frame

An alternative conceptualization of organizational culture derives from anthropologists who regard culture as a "web of meaning" (Geertz, 1973), some of which is ordered in cognitive structures, or "frames" (Cornelissen & Werner, 2014) that enable categorization (Douglas, 1978). This perspective draws on traditions in anthropology, sociology, psychology, behavioral economics, communication studies, and organization studies that assert that people reduce cognitive complexity and order their worlds through developing and adopting simplifying cognitive structures (frames) (Goffman, 1974; Douglas, 1986; Snow & Benford, 1988; Kahneman & Tversky, 1979; March & Simon, 1958). Much like a picture frame directs our eye to what is within it, so does a cognitive frame direct our attention, enabling us to categorize or classify otherwise unmanageable fluxes of information. Cultures as frames, therefore, shape what their members pay attention to and what they ignore (Douglas, 1978; Huising & Silbey, 2011; Silbey, 2009). They influence how an organization's members "set" problems – or detect and label situations as "problematic" to begin with, as well as how they set about to solve such problems (Schön, 1983).

Organizational scholars have adopted this perspective to describe how cultures serve to frame reality and filter issues for organizations' members (Howard-Grenville, 2006; Giorgi et al., 2015). Employees frequently use their pre-existing frames to help them understand new issues, interpret and act on the issue. Thus, organizational culture regarded as frames guides employee behavior through the translation of abstract meanings into understandable language, prescriptions, and actions (Howard-Grenville & Bertels, 2012; Wei-Skillern, 2004). For instance, Howard-Grenville (2006, 2007) found that certain groups of employees at a high-tech manufacturing firm, who viewed problems as data-based technical challenges, struggled at first when presented with goals for environmental performance, until they were able to translate these goals into technical metrics. As we discuss further in the next section, frames often are formed when people are trained to possess specialized expertise or are socialized into a group with a certain approach to problem solving. Training and socialization influence how people categorize and frame the world, but they can also tend to instill value commitments. Hence, frames are not independent of judgments about what is right and appropriate. However, frames can be manipulated so the same frame can be applied to new situations, and people can be influenced to alter their frames.

Whereas the culture as shared values perspective emphasizes the desirability of a core, uniform set of cultural values, and presumes that these endure with little manipulation by those subject to them, the culture as frames perspective admits great cultural variation and manipulation. First, because frames often align with technical, occupational, or professional expertise, it is likely that an organizational culture will admits varied frames and their associated ways of detecting and acting on problems. Second, the frame perspective recognizes that frames can be actively reconstructed, even if they appear durable. Managers and employees who are adept at deploying and manipulating cultural frames can attempt to draw attention to issues of interest to themselves by framing the issues for other employees. Framing is the "active social construction and negotiation of frame-based meanings" (Cornelissen & Werner, 2014: 196). In

the context of social movements, framing helps advocates align potential members with a movement's aims (Benford & Snow, 2000). Within organizations, employees can similarly use framing to connect new issues or concerns to existing cultural frames. For example, Howard-Grenville and Hoffman (2003) describe how issues like sustainability might enter an organization through being framed as associated with other predominant concerns (e.g. lean operations, customer responsiveness).

C. Culture as Repertoire

The repertoire perspective of culture departs from the previous two perspectives in which culture was regarded as primarily cognitive regularities, whether in terms of values or frames. Culture as a repertoire is primarily conceived in terms of actions, and focuses on how people use cultural knowledge and "resources" in everyday life (Swidler, 1986). People's use of culture emerges in patterned behaviors, termed "strategies of action," that become meaningful through their use over time (Swidler, 1986). Swidler, a sociologist, first advanced this perspective because she was explicitly seeking to counter a view of culture as hinging on values, and she was concerned about culture at a broad, societal, (rather than organizational) level. She emphasized that what might look like shared value commitments should in fact be read as shared strategies of action – ways of acting that are socially recognized and validated The difference lies in the fact that people might use the same strategies of action, yet pursue somewhat different ends with them. As Swidler explains, members of a culture might have a "general way of organizing action… (for example, … relying on selling one's skills in a market) that might allow one to reach several different life goals." (1986: 277).

If culture is then primarily about upholding patterns of action, these actions must come from somewhere. Swidler argues that strategies of action draw into use a set of *cultural resources* that reside in a broader cultural *repertoire*, which might be held at the collective (group, society, or organizational) level (1986). Cultural resources are both tacit and explicit carriers of cultural knowledge, and can include stories, symbols, roles, rituals and identities. So, for example, a company's founding story or iconic symbols from its history can serve as cultural resources that, while not immediately at hand, inform day to day strategies of action. A particularly daring founding story might serve as a cultural resource for employees who enact an entrepreneurial strategy of action, for example. In this sense, values or beliefs could be regarded as one form of cultural resource. In fact, Swidler uses the term "ideology" to refer to some cultural resources. The elements of her theorizing might not therefore be regarded as fundamentally different from those of Schein's, but their ordering and how they fit together is. The repertoire perspective takes a more dynamic view of organizational culture than the other perspectives, viewing its members as skilled cultural actors, rather than guided by a subconscious schema of values or meanings (Howard-Grenville & Bertels, 2012; Martin, 2002). Hence, strategies of action take primacy, and culture inheres in their patterns of use, not in the values of beliefs one might infer underpin them. It is the opposite in Schein's model, where "true" culture rests with values or taken for granted assumptions, and one might be fooled into observing actions that are, at best, surface manifestations of these. Of course, if actions and underlying beliefs are more of less in alignment, then the two models converge somewhat, which we revisit later.

The role for leadership in directly shaping culture is subtler when culture is regarded as a repertoire than it is when culture is regarded as shared values. In each perspective, consistency between words and actions is essential, yet a culture as repertoire perspective tends to give greater attention to bottom-up (as opposed to top-down, leader-driven) processes. Just as members can resist efforts to change because they are comfortable with their familiar strategies of action, so too can they introduce variation within a culture because they may possess cultural resources from other settings. One concern with the culture as repertoire perspective is that it leaves culture as potentially too malleable and dispersed among diverse organizational actors, and it is often unclear on how members select certain resources over others, and what might delimit these selections (Lamont, 1992; Giorgi et al., 2015).

The repertoire perspective has opened up another new way of thinking about organizational culture, as an "open system" (Harrison & Corley, 2011). Previously, culture was conceptualized as a private system (Weber & Dacin, 2011), understood and guided only by its members, who often also believed in the distinctiveness of their unique cultures (Martin, Feldman, Hatch & Sitkin, 1983). A view of culture as a repertoire helps us see that cultural resources can move across organizational boundaries, making organizational culture potentially "public" and its boundaries permeable. Harrison and Corley (2011) describe the intentional cultivation of a public, or open system, culture by a climbing firm that both infused its organizational culture with elements of "ethos" and "style" from the broader rock climbing enthusiast community, and also seeded this community with its own cultural materials to influence its evolution. This work suggests that organizational cultures must achieve some degree of authentic alignment with the cultures of their external stakeholders. Harrison and Corley (2011) assert that this is especially important in response to increasing demands for organizational transparency.

We summarize the three perspectives on culture and their respective differences in Table 1.

Table 1: Summary of the Three Perspectives on Culture

Cultural perspective	Culture inheres in:	Culture is maintained through:	Culture changes through:	Characteristics differentiating from other perspectives
Culture as shared values	Values as articulated by leadership.	Values become taken-for-granted "basic assumptions," so not acting in line with them is inconceivable.	Top-down, radical and planned change effort. Change can only take hold if people adopt new taken-for-granted basic assumptions.	Culture uniform across organization. Culture is static/inertial.
Culture as frames	Cognitive structures (frames) that focus people's attention on particular types of problems and solutions.	Frames are cognitive "short-cuts" typically acquired through socialization. Specific frames associated with specific occupations or groups. These groups naturally default to using them within organizations.	Proactive "framing" of a new issue in terms of existing frames. Or, bridging between distinct frames to generate understandings of overlap.	Culture differentiated between groups (subcultures) holding common frames. Culture somewhat malleable as people engaging in "framing" of issues and bridging of frames.
Culture as repertoire	Patterned strategies of action that draw from a common set of cultural resources (including stories, symbols, etc.).	The repeated use of a common set of strategies of action.	Bottom-up improvisation with actions that may alter set of strategies of action. Or, managers may introduce new resources and repurpose strategies of action.	Culture used in potentially diverse ways across the organization; not necessarily aligned with subcultural groupings. Culture inherently dynamic; always in the making.

D. Which Perspective is Right?

Unfortunately, choosing which among these perspectives is the "right" one is not easy. Often, researchers studying culture select one that aligns with the particular case at hand, or accords with how they see the world. This is not a very satisfactory or systematic means to select among these perspectives. However, it might be more valuable to point out that none of these perspectives is necessarily "wrong," and in fact each is right in important ways. Returning to the

metaphor of a house, each perspective is like a window affording slightly different views of the whole culture. This is not to say that each perspective does not have shortcomings or blind spots. Indeed, it is the very blind spots of one perspective that might be compensated for if we have more than one perspective at hand. As well, these perspectives have been previously recognized as compatible with each other, and potentially complementary (Canato, Ravasi, & Phillips, 2013; Giorgi et al., 2015; Howard-Grenville & Bertels, 2012).

In fact, Giorgi and colleagues (2015), in their review of three decades of organizational culture literature, come up with five perspectives (the three above plus two others[2]), and conclude that the perspectives of culture as values and as repertoire each engender the requirement of commitment from organizational members. As such, each might be considered central to understanding the cultural "glue" that binds members to an organization. However, each emphasizes a different underpinning of commitment. The values perspective suggests that people commit to a certain set of ideas; the repertoire perspective suggests that people commit to and enact of a certain set of actions. When taken together, the perspectives suggest that values appear to guide action, and actions then signal particular values.

Conceptualizing culture as an interaction between values (or "beliefs," the term we prefer, as noted earlier) and actions therefore portrays it as an ongoing, recursive process, which is recreated (or changed) over time through the interplay of beliefs and actions. The relationship between beliefs and action in sustaining culture is therefore a "both/and" rather than an "either/or" relationship. The frequently observed need for cultural consistency (Chatman & Cha, 2003) is accounted for readily with such a conceptualization. Holding both perspectives, along with the framing perspective, is important, however, as each has somewhat different implications for cultural management, guidance, or change.

Recent empirical work also demonstrates the compatibility of regarding culture as values and culture as repertoire. Canato, Ravasi, and Phillips (2013) studied the adoption of Six Sigma at 3M, a rigorous quality management program focused on maximizing efficiency and minimizing waste. As an external, standardized program, championed by GE under Jack Welch, Six Sigma's guidelines and practices were considered to have a low degree of "fit" with 3M's culture of innovation and creativity (Canato et al., 2013). In fact, 3M's most iconic story is that of the accidental invention of the Post-it note when an engineer was seeking to make a more effective adhesive. 3M's practice, established in 1948, of giving all employees 15% of their working time to spend on creative projects helped foster a culture in which innovation was not only valued but also a familiar, day-to-day practice used by employees. Predictably, 3M employees resisted the imposition of Six Sigma, but were forced to adopt its practices under a new CEO. Canato and colleagues found that, as 3M employees used and became accustomed to the Six Sigma practices, they gradually adapted certain cultural strategies of action to more closely align with Six Sigma. However, these authors conceptualized 3M's culture as "hierarchical," in the sense that some strategies of action that were less tied to long-held values

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[2] The two remaining perspectives uncovered by Giorgi, Lockwood, & Glynn (2015) are stories and categories. Stories can be regarded as consistent with the repertoire view, in that they are considered a type of cultural resource. However, Giorgi et al. separate stories in their paper from the repertoire view because the use of stories can signal a certain type of analysis (narrative analysis) that is less relevant for this paper. Categories have been used to describe culture at a higher level of analysis – at the level of an industry rather than within an organization – which also makes this perspective of culture less relevant for this paper.

and beliefs were readily altered, while others, which were closely tied to the core value of innovation, did not change. With the hiring of another new CEO some years later, 3M relaxed its Six Sigma policy, but those aspects of the program that had been readily absorbed into the culture stayed, while those that threatened core values were jettisoned. The message is that culture can be conceptualized as both values and actions, with some actions tied more closely to long-held values, making them more resistant to change (Canato et al., 2013). In other settings, we might see similar compatibilities between, for example the culture as frames and the culture as repertoire perspective. For example, in hospital settings where many occupations interact, efforts to change culture might hinge more on attempting to frame issues in a way to create common grounds for action (Kellogg, 2011).

III. Additional Cultural Considerations

Summary: This section presents considerations that influence how to think about culture in situations where culture is uneven within an organization, or when two or more distinct cultures are merged.

So far, we have discussed culture as if it might be relatively unitary within an organization, that is, one organization has one culture. But anyone familiar with organizational life knows that this is a vastly simplifying assumption. In this section, we consider several additional factors that shape our understanding of organizational culture and how it might be evaluated and managed.

A. Integrated, Differentiated, and Fragmented Cultures

Organizational scholars Debra Meyerson and Joanne Martin (1987) set out to explore how seemingly paradoxical statements about cultures could each ring true – for example, that they are resistant to change yet seemingly continually in flux. They argue that we hold different ideas about the nature of culture, each of which leads to distinct ideas about and prescriptions for cultural change. Three "paradigms" capture these differences: the integration, differentiation, and fragmentation paradigms (Meyerson & Martin, 1987). The *integration* paradigm is the one most frequently touted in popular press accounts of culture. In this view, cultures are viewed as uniform and relatively unitary; "an impression of consistency emerges because [integrationist paradigm] views of culture focus only on manifestations that are consistent with each other." (Meyerson & Martin, 1987: 625). As a result, the ideas, values or desired behaviors permeating the organization are expressed at a fairly abstract level and tend to be espoused by leaders. This is especially consistent with Schein's work (2010), which emphasizes the importance of leader-articulated values and their internalization as taken for granted assumptions by employees across the organization. Cultural change in such a setting is rare, difficult to achieve because of inertia and resistance, but more likely to occur if approached as a revolutionary, top-down, as opposed to evolutionary, bottom-up change process.

In contrast, a *differentiation* paradigm suggests a "puzzle piece" culture with different subcultures that each fit together, but comprise values, frames, or strategies of action that are diverse and perhaps even contradictory (Meyerson & Martin, 1987). For example, in many organizations strong subcultures exists around certain occupational groupings, and these cut across and transcend individual organizations. The perspective that culture is a set of cognitive

frames meshes well with this paradigm, because occupational training and other socialization practices shape people's ways of seeing the world. Consider, for example, surgeons and nurses. Surgeons might frame patient care in terms of the highest quality technical care, while nurses may frame patient care in terms of caregiving and compassion. These frames can shape interactions between these occupations, and the nature of such interactions may well be similar across numerous hospital settings. In such cases, the culture of a given hospital organization may be less important than the subcultural interaction between occupational groups. In fact, research shows highly consistent types of interactions between surgeons and their surgical teams across multiple hospitals, with many teams headed by surgeons who act as "captain of the ship" (Edmondson, Bohmer, & Pisano, 2001). Incidentally, such teams were the most resistant to a planned change around a newly adopted technology).

Similarly, engineers and marketers, lawyers and accountants, police officers and social workers, and many other occupational groupings might profoundly influence how work gets done in organizations, over and above, or perhaps in spite of, efforts to create unifying organizational cultures (Van Maanen & Barley, 1984). As well, national, ethnic, class, age, and gender-based identities contribute to additional manifestations of culture, and perhaps nested subcultures reflecting both occupational and other differentiators (Meyerson & Martin, 1987). Finally, subcultures frequently also arise around geographies, or simply due to the pursuit of multiple goals (Jermier, Slocum, Fry, & Gaines, 1991; Stevenson & Bartunek, 1996; Howard-Grenville, 2006). Even in the absence of pressures for change, coordination across differentiated subcultures is notoriously difficult because it involves bridging fundamentally different ways of seeing the world, and often strong behavioral commitments to these frames. Coordination can be enabled by "boundary objects," which are artifacts – as complex as prototypes of equipment or as simple as sketches of processes, – that enable people with differing expertise to come together and articulate their perspectives, discuss differences, and come to common understanding (Bechky, 2003; Carlile, 2002).

Cultural change in a differentiated culture can be triggered from myriad sources, and is unlikely to stem only from leader actions. For example, a shift in external conditions might influence one subcultural group more than others, leading to localized pressures for change and adaptation (Meyerson & Martin, 1987). When change is initiated by top leadership, it will likely proceed unevenly across different subcultures. In a study conducted by one of us at a major semiconductor manufacturer, pressures in the late 1990s from regulators and environmentally concerned citizens were felt strongly by a group involved in design and building of new factories, and by the company's most senior leadership. Leadership directed the design/build group to immediately evolve their approach to design, in order to account for water consumption and environmental emissions. To respond to these new criteria, however, the design/build group had to work with and influence the R&D engineers who actually developed the new manufacturing equipment responsible for the factory's emissions. R&D engineers had a distinctive data-driven subculture, which made them suspicious of any "community" concerns that could not be readily quantified. Eventually, gradual cultural change did occur, but it rippled unevenly across the organization as factory designers, R&D engineers, Environment Health and Safety specialists, and factory integration specialists confronted particular problems and questioned their ways of working. As this example illustrates, cultural change in more highly differentiated cultures is likely more evolutionary than revolutionary.

Finally, Meyerson and Martin assert that a *fragmentation* paradigm on culture divulges a total *lack of consensus* throughout the organization on values, beliefs, and actions, even within subgroups. This does not imply that culture does not exist, simply that culture is unevenly shared among individuals, and there is no stable consensus even within subgroups as there is in a differentiation paradigm. In fragmented cultural settings, ambiguity is acknowledged and even embraced. Culture lacks full consensus but certain elements of it may be in strong alignment at certain times, and at other times misaligned. Culture itself might be thought of as a series of transient patterns of interaction that are activated by issues or events (Meyerson & Martin, 1987). At the extreme, there might be only one shared understanding within such cultures, that of acceptance of ambiguity. While Meyerson and Martin's work preceded the use of the repertoire perspective on culture in the organizational sciences, it is now clear that a fragmented culture paradigm could align with this perspective, if the latter is taken to an extreme. In a culture with a large and diverse repertoire of resources, with a large and diverse set of acceptable strategies of action, employees might act in highly varied ways, tailoring their use of cultural strategies of action to the situation at hand and their own training, expertise, or even preferences. Such a flexible use of culture might be both a source of adaptability (Chatman, Caldwell, O'Reilly, & Doerr, 2014), as it enables people to respond to different and perhaps rapidly shifting demands, and it may simultaneously be a source of stress and dysfunction. Fragmented cultures have not been depicted in research as commonly as have integrated or differentiated cultures. However, Meyerson and Martin assert that early work on large public sector organizations, in which these organizations were depicted as disjointed "organized anarchies" (March & Cohen, 1986; March & Olson, 1976; Starbuck, 1983), or that on highly independent innovative arms of private sector organizations – known as "skunkworks" – might in fact be examples of cultures that operate with a high degree of ambiguity and, in some cases, might even thrive on it.

Change in a fragmented culture is neither a revolutionary nor evolutionary event. Instead, change might be regarded as a constant state within such cultures. Comfort with ambiguity is a precondition for members within a functional fragmented culture, and these people likely adapt and experiment as new conditions or situations arise. Hence, culture change might be gradual and even undetectable against an unstable backdrop, yet it also might be highly tuned to immediate and diverse needs. Some settings are conducive to such types of change and flux as they are founded on the premise of experimentation, learning, or openness. For example, innovative labs or classrooms are settings where creativity is encouraged and ambiguity tolerated, and cross-cultural businesses can be settings where ideological openness is fostered (Meyerson & Martin, 1987).

It is interesting to note that the "ideal" culture has long been presented in the popular press as one that is highly integrated and enables employees to orient around a core organizational goal (e.g., customer service at Nordstrom), but that ideal has been gradually shifting. Today's organizations seek to inculcate learning cultures, an openness to experimenta-tion, and a tolerance of ambiguity and rapid change within their cultures (Garvin, Edmondson, & Gino, 2008). For example, recent work finds that adaptability is the single most important aspect of a culture that can be linked to financial performance (Chatman et al., 2014). Adaptable

> ### *Example: Adaptable culture at Amazon.com*
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> *The organizational culture of Amazon, the world's largest online retailer, is a model of adaptive growth, in which risk-taking and experimentation have been key to the company's long-term success (Holton, 2014). Amazon has developed a culture in which honesty and sharing of clashing viewpoints is the norm among employees, which has permitted the company to experiment with products and services outside of its core business. For example, at first, the Amazon Kindle seemed to threaten Amazon's own legacy of selling books. However over time, the Kindle became a strong core business of the company, cementing Amazon as a leader in the marketplace for online books and e-reader technology. Although many companies focus on maintaining short-term profitability, steady growth, and minimizing risk, Amazon's adaptable growth culture has permitted the company to experiment with new ideas, products, and services that have maintained Amazon's status as a market leader (Holton, 2014).*

cultures, not surprisingly, emphasize risk-taking, personal initiative, and a willingness to experiment, but also downplay "being careful, predictable, [and] avoiding conflict" (Holton, 2014).

We caution that, just as a strongly normative culture that directs employees towards customer service serves some organizations, like Nordstrom or WestJet, extremely well, an adaptable culture that directs employees to experiment and takes risks will be better suited to certain organizational goals. Whether a culture appears more integrated, differentiated, or fragmented is at once partly in the eye of the beholder, and also should reflect the actual goals and complexities of a given organizational setting.

B. Merging Dissimilar Cultures

Mergers and acquisitions in the private sector frequently flounder or fail because it can be so difficult to meld two distinct cultures. "Cultural mismatch in an acquisition or merger is as great a risk as a financial, product, or market mismatch" (Schein, 2010: 377). Often, managers seek to exploit beneficial differences between the merging organizations – bringing together, for example, an innovative culture with a mature, disciplined one, in an effort to garner the best of both. Schein asserts that the careful work HP and Compaq undertook, working through each business process individually, enabled a merging of culture that did incorporate the best of each (Schein, 2010: 295). More typically, mergers are undertaken more rapidly or are not regarded as mergers of equals, meaning that one organization's culture, systems (IT etc.), procedures and routines are perceived as superior to another's and the work involves transferring these enterprise-wide. A second reason that mergers are challenging culturally is that they inevitably introduce some ambiguity around culture (and many other aspects of organizing). Other changes, like joint ventures and spin-offs also introduce ambiguity (Corley & Gioia, 2004). In each case, the gap between the new organization's desired and espoused culture and its existing corpus of cultural elements from legacy organizations needs to be worked through in practice. This can take considerable time and effort. If limited effort is made to guide cultural integration following a merger, the legacy cultures of each organization will fill the void; employees will look to

familiar beliefs and strategies of action, even if new ones are being espoused (Canato et al., 2013; Bertels, Howard-Grenville, & Pek, 2015).

Finally, even when culture is mindfully tackled as a key focus following a merger, any change process tends to uncover and in fact generate resistance. Classic work on organizational change suggests that managers should *first* work to reduce resistance to change, by, for example, demonstrating how "old" strategies of action no longer work for new priorities, and only then build up pressures for change by emphasizing the reasons for change (Kotter, 1995; Lewin, 1951). By leading with arguments *for* change, before addressing resistance to change, managers can inadvertently trigger normal psychological responses of resistance. As well, studies demonstrate the power of representing change as an opportunity and painting a vivid picture of an associated positive future, over the relatively limited power of representing change as a threat (Deutschman, 2005). We further discuss change processes in our final section.

IV. Cultural Assessment and Guidance

Summary: This section will help those charged with assessing and guiding an organization's culture to understand the available tools and their uses, strengths, and limitations.

Given the degree of attention paid to organizational culture in the academic literature, and the rich experiences of culture change among diverse organizations, it should come as no surprise that numerous tools for assessing and guiding culture have been developed. As mentioned earlier, given culture's complexity and the need for it to align with distinct organizational goals, guidance to try to attain a certain type of culture is often over simplified. Instead, managers can and should seek to deeply understand existing culture, the gaps between this and a desired culture, the alignment or misalignment of each with organizational goals, and then work to achieve greater alignment through guiding the culture in both top-down and bottom-up fashions. Experience and research suggests that efforts to create or change a culture are ongoing, often require adjustment, and frequently take longer than anticipated. This is because culture inheres both in deep-seated beliefs, as well as day-to-day patterns of action. Changes in one necessitate changes in the other, but each is so familiar, habitual, and taken for granted that it is common to regress. In this section, we present several specific tools that have been advanced for guiding culture and evaluate these, concluding with lessons that can be extracted from these tools in combination with our review of the organizational culture literature.

A. Tools for Evaluating and Guiding Culture

Tools for evaluating and guiding culture can be grouped into three general categories. The first are *typologies* used to identify archetypal organizational cultures and enable organizations to map themselves against these archetypes. The second are surveys or *assessment tools* that do not identify archetypal cultures but instead delineate a set of attributes that a culture might display, enabling organizational members to map their pattern of attributes against a potentially desirable set. A final set of tools, which we call cultural *pulse takers*, include those that are used to assess employees' awareness of and capacity to act on existing organizational culture, and readiness to undertake cultural change. We discuss a variety of specific tools within each category in turn.

B. Cultural Typologies

Cultural typologies group types of organizational cultures according to similarity along specific dimensions. The typologies aim to present archetypal cultures, simplifying along critical dimensions the otherwise diverse array of cultural possibilities. Typologies can be valuable because they highlight key dimensions on which organizational cultures differ, and they help leaders think about where their organization is on these dimensions and what are the tradeoffs versus other archetypes. A major limitation of these typologies, however, is that they, by definition, simplify cultures to a few dimensions so they can't effectively capture the richness or variability within a given culture. As well, typologies typically do not offer comprehensive ways to inventory or assess a given culture, nor can they offer specific guidance to those seeking to change a culture. Several influential typologies (see Table 2 for a summary) are those developed by Etzioni, Ouchi, Goffee and Jones, and Cameron and Quinn. These typologies are not definitions, categories, or perspectives of cultures in and of themselves, such as were discussed in Sections 2 and 3; rather typologies are tools with which to assess aspects of a culture, regardless of what type or definition used.

Sociologist Etzioni argued that organizations' cultures differ systematically on the basis of their members' nature of affiliation with the organization. He articulated three basic types of organizations that hinged on the type of authority expressed. *Coercive organizations*, like jails or military academies impose absolute authority on members and typically develop both strong cultures and counter cultures in response to the nature of authority. *Utilitarian organizations* derive authority from members' need to affiliate for practical reasons, such as pay, and authority tends to be negotiated between groups; examples include most business organizations. And *normative organizations* derive authority from the alignment of members' goals with those of the organization; examples include voluntary organizations, political parties and some business models such as partnerships. While this typology highlights the importance of attending to assumptions about participation, involvement, and motivation of an organization's members, it also focuses much more on power and authority as the primary dimensions of human relations, as opposed to other dimensions such as trust and peer relations. Accordingly, others sought to incorporate other dimensions of human interaction into cultural typologies. For example, Goffee and Jones' typology, which discerns two core elements of group behavior (a focus on task or a focus on group building), applies these at the organizational level to come up with four types of cultures:

1. Fragmented (low task and low group building emphasis);
2. Mercenary (high task emphasis and low group building emphasis);
3. Communal (low task emphasis and high group building emphasis); and
4. Networked (high task and group building emphasis).

While Goffee and Jones extrapolated from core distinctions known about group behavior, Cameron and Quinn (1999, 2006) developed a cultural typology by factor analyzing a large number of measures associated with organizational performance and discovered two dimensions around which results clustered. In Cameron and Quinn's typology, culture is delineated less on

Table 2: Summary of Select Cultural Typologies and Cultural Assessment Tools

				Cultural Typologies		
Tool	**Author(s)**	**Year**	**Structure**	**Summary**	**Strengths**	**Weaknesses**
3 Types of Organizations	Etzioni	1975	Categorization according to type	Coercive organizations (individuals obey authority because they rely on organization for economic reasons); Utilitarian organizations individuals abide by organization's rules so work gets done); Normative organizations (individuals complete work because personal goals align with organizational goals)	Captures basic relationship between individual and organization, a fundamental cultural dimension	Organized at "poles" when many cultures have aspects of all three categories
Cultural Typologies	Ouchi	1978; 1981	Categorization according to type	Hierarchy (Internal focus, stable, structured, well-coordinated); Clan (Internal focus flexible, collaborative, friendly, family-like); Market (External focus, stable, competitive, results-oriented);	Represents archetypical categories of culture	Organized at "poles" whereas many cultures have aspects of all three categories
4 Types of Cultures	Goffee & Jones	1998	Categorization according to 2 dimensions	Fragmented (Low on solidarity, low on sociability); Mercenary (High on solidarity, low on sociability); Communal (Low on solidarity, high on sociability); Networked (High on solidarity, high on sociability)	Able to measure via survey; Represents the interaction between task and personal factors in a group setting	Cannot analyze which type of culture is best under different environmental conditions
Competing Values Framework	Cameron & Quinn	1999; 2006	Categorization according to 2 dimensions	Hierarchy (Internal focus, stable, structured, well-coordinated); Clan (Internal focus flexible, collaborative, friendly, family-like); Market (External focus, stable, competitive, results-oriented); Adhocracy (External focus, flexible, innovative, dynamic, entrepreneurial)	Able to measure via survey; Analyzes large numbers of indicators of organizational performance	Organized at "poles" when many cultures have aspects of all four categories
				Cultural Assessment Tools		
Tool	**Author(s)**	**Year**	**Structure**	**Summary**	**Strengths**	**Weaknesses**
Denison Organizational Culture Survey	Denison	1990	Assessment of dimensions relevant to desired organizational outcomes (survey)	Assessment takes inventory of organizational characteristics to measure Mission, Consistency, Involvement, Adaptability; additional aspects of culture are to be obtained by interviews & observations	Able to measure via survey; Can identify key dimensions most relevant to organizational	Need large sample; Cannot measure everything about a culture
Human Synergistics International Model	Cooke & Szumal	1993	Assessment of dimensions relevant to desired organizational outcomes (survey)	Assessment takes inventory of three basic organizational styles: Constructive styles, Aggressive/Defensive styles, Passive/Defensive styles	Able to measure via survey; Can create an organizational "profile" to describe its cultural style	Requires outsider perspective to decipher results
Booz-Allen Hamilton	Sackmann	2006	Checklists measures 10 cultural factors (survey)	Assessment takes inventory of 10 organizational characteristics to measure objectively and compare between organizations; additional aspects of culture are to be obtained by interviews & observations	Able to measure via survey; Connects organizational characteristics to performance	Doesn't represent how things actually work in an organization

behavioral and more on structural aspects of organizing. Extending earlier work by Ouchi (1978), their typology yields four types of cultures:

1. Hierarchy (internal focused, structured and coordinated);
2. Clan (internal focus, flexible and collaborative);
3. Market (external focus, competitive and results-oriented);
4. Adhocracy (external focus, flexible and innovative).

Cameron and Quinn's typology is known as the Competing Values Framework (Cameron & Quinn, 1999, 2006; Quinn & Rohrbaugh, 1983), because its main dimensions (internal versus external focus; structured versus flexible interactions) are regarded as in tension, with many organizations managing this tension by expressing one pole at the expense of another.

Cultural typologies can be helpful when organizations are looking to understand "where they are" on a map of the cultural landscape, but, like any map, they are only one portrayal of a messy and dynamic reality. They can, however, help managers assess where their culture is compared to where the might like it to be for it to better serve organizational goals. As mentioned earlier, a "clan" culture might be highly desirable for some kinds of organizational goals, including those such as delivering highly flexible customer service. A cultural assessment might instead reveal that another type of culture is actually in place, giving managers a starting point for contemplating change.

C. Cultural Assessment Tools

Cultural assessment tools differ from typologies in that they do not seek to identify overarching dimensions nor define archetypal cultures based on these dimensions. Instead, they offer questions, checklists, or a variety of dimensions along which various elements of culture can be assessed. The aim is to ascertain the set of cultural attributes, from a predetermined list, that an organization has or lacks. Whereas typologies tend to assume that different types of cultures will be best suited to different types of organizational goals and external environments, most cultural assessments are grounded in a rather more generic and non-controversial set of

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> ***Example: Applying the Competing Values Framework***
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> *Studying the construction industry, Igo & Skitmore (2006) used the Competing Values Framework (CVF) tool to assess if the existing cultural profile of a firm was considered appropriate by employees for achieving organizational goals and performance. Through use of the CVF, the authors identified that the firm had a market-oriented culture, whereas an employee-oriented, or clan, culture was considered by many organizational members to be better suited for successful organizational performance. The authors were able to use the CVF tool to diagnose a misalignment between a cultural orientation that employees perceived to be appropriate and a cultural orientation that was being experienced – information that managers could then use to instigate cultural change.*

attributes (e.g., leadership styles, norms for team interaction, etc.) that could apply regardless of the organization's particular goals.

These assessments can be valuable in that managers can heighten their awareness of which cultural attributes the organization has that may contribute to or hinder reaching organizational goals, and which potentially desirable attributes the organization lacks. However, these assessments tend to list a full set of potentially desirable attributes for any type of organization in any industry, without necessarily identifying which set of attributes are most suitable nor how to prioritize them (Martin, 2002; Schein, 2010). Leaders and managers are entrusted with determining which attributes are most desirable for their particular organization. It may be the case, of course, that certain attributes (e.g., "risk taking") are entirely unsuitable for certain organizations, or, they are highly undesirable in some part of the organization but desired in another part. As well, these assessment tools are limited in their ability to divulge what actually happens in an organization, so certain attributes that are formalized or espoused but not actually acted on may get undue attention and misconstrue the culture. Assessment tools thus typically require additional research into the culture of an organization via interviews and observation, to first understand the set of cultural attributes considered desirable for the specific organization, and to understand the behaviors or hallmarks expected to be associated with these attributes. Furthermore, assessments are typically deployed in survey form, and thus are often very complex, costly and time consuming to administer, as well as require large numbers of respondents to capture reliable information (Schein, 2010).

One popular cultural assessment tool is the Denison Organizational Culture Survey (Denison, 1990), which takes inventory of organizational characteristics to measure twelve dimensions of culture under four categories: Mission, Consistency, Involvement, and Adaptability. A benefit of this assessment is that organizations participating in the survey are scored normatively, meaning that their scores can be compared against other organizations rated as low or high performance on the same survey (Denison, 2015). This comparison permits organizations to interpret their own survey results through the identification of how effective their organizational culture is, as related to performance (Schein, 2010). There are two major limitations of this survey and others like it. First, organizations typically need to hire a third party to administer the survey and interpret the results, because such surveys are typically proprietary and administered by consultants. Second, survey assessments measure abstract yet quantifiable aspects of an organizational culture, but cannot capture what actually occurs in the organization on a day-to-day basis, thus requiring additional research by organizational members to understand the context in which the cultural attributes measured on the survey are developed and deployed (Schein, 2010).

Detailed assessments have also been developed by those seeking to understand the connection between organizational culture and organizational performance, the latter measured either in terms of financial performance, productivity, or much more focused measures like employee turnover intentions. One such assessment, undertaken by researchers from Booz Allen Hamilton (a consultancy) and Bertelsmann Stiftung (a German publisher), developed 10 factors thought to shape successful corporate cultures, and used detailed checklists for each factor. The team then evaluated nominated companies and selected six as exemplary for how they had developed and used their cultures to achieve excellent performance (Schein, 2010; Sackmann et

al., 2006). These assessments not only attempt to link culture to specific outcomes, and hence look at specific, detailed aspects of culture (e.g., customer orientation, participative leadership), but they also get beyond a level of abstraction common in surveys intended to be more broadly used. However, the critique still stands that any survey or checklist based assessment of culture can at best capture the "parts" of culture rather than a holistic assessment of this complex construct (Wilderom, Glunk, & Maslowski, 2000). As well, it is hard to get a nuanced understanding of the ways in which culture varies within an organization, perhaps between occupational or other subcultures. Because of this, researchers who assess culture with the intention of guiding cultural change will typically rely on combinations of surveys, interviews, observations and workshops, ideally over a period of time (Sackmann et al, 2009; Howard-Grenville et al., 2011; Howard-Grenville, 2007).

An alternative way of assessing culture involves focusing on the actions of organizational members, and thus is more in line with an understanding of culture as a repertoire or toolkit. Work by one of the authors of this paper (Bertels, Papania, & Papania, 2010) has led to a diagnostic tool that enumerates a set of organizational practices that yield usable insights into an organization's culture. Grounded in a large-scale systematic review of both academic and practitioner work on culture change, the initial theoretical framework ("the embedding wheel," see Figure 1) developed in that review laid out a portfolio of organizational practices that organizations can undertake to embed sustainability into their organizational cultures. In subsequent work, Bertels has tested and refined this diagnostic assessment, working with dozens of global companies including several large Canadian oil and gas companies and with municipalities. In more recent work, this framework has been amended to serve as a tool to help a Provincial/Territorial regulator examine the practices it undertakes in its efforts towards organizational sustainability. The version of the wheel used in the regulatory context is shown below.

Figure 1. The Embedding Wheel

Formal practices
that leverage rules and procedures

Deliver
on existing
commitments

Advance
further along the
path to sustainability

Informal practices
that leverage values and influence social norms

Source: Bertels, Papania, & Papania (2010)

The upper right hand quadrant (formal advancement) asks how the organization plans for the future in terms of how it sets organizational goals, how it establishes organizational priorities, and how it sets strategy. It also asks about the practices that support organizational learning and innovation. The lower right hand quadrant (informal advancement) asks how the organization brings in information from the outside, how it engages its leaders, and how it builds readiness for the changes required to deliver on its goals. The lower left hand quadrant asks about the practices that shape organizational and individual identities by signaling norms and by demonstrating desired behaviors. It also asks about how the organization manages talent in terms of who they recruit, how they are socialized, and the investments made into employee development. Finally, the upper left quadrant explores how work is assigned and rewarded, how it is integrated into core business processes and how the organization assesses and reports on progress.

Bertels' work with both private and public sector organizations (including regulators) highlights the importance of engaging in a full spectrum of practices that help support an organization's ability to deliver on its commitments (deliver) with practices that make way for the changes that will help drive innovation (advance). It also highlights the need to balance the use of formal practices that guide behavior through rules, systems, and procedures and informal practices that attempt to shape values and social norms. While the quadrants may convey the feel of a typology, the tool is not intended to place organizations in this fashion; in fact, the value of the tool is in its capacity to map actions that are currently being taken and reveal the relative balance or imbalance of these against needed actions in all four quadrants. A drawback of the tool is that it demands significant time and engagement with specialists across the organization to develop an informed and accurate assessment of the cultural practices in use. As well, it would ideally be used both with higher level managers and, perhaps in simplified form, with employees, to get as complete a picture of actual practices as possible. Again, as with all assessments, a more holistic understanding of culture can be gleaned when the tool is used in combination with focus groups, observations, and interviews.

D. Cultural Pulse Taking

Few of the tools discussed so far are intended for use directly with or by employees. Yet, as elaborated earlier, it is precisely at this level that culture must be authentically experienced for it to enable work that successfully advances organizational goals. Employees either do or do not have knowledge of key elements of a culture, they either can or cannot understand how their day-to-day work contributes to or enacts elements of the culture, and they either do or do not believe they have the power to act to change elements of a culture. The tools we discuss in this section are an assembly of approaches that can help managers assess what their employees know about their organization's culture and evaluate employees' readiness for change. We first consider employee culture survey tools, and then introduce the concept of efficacy, which can be used to assess readiness for acting on cultural change.

Many organizations use culture surveys to probe their employees' understanding of organizational culture. These often serve more as an assessment of employee satisfaction than a true reflection of culture, partly due to survey design and partly due to how employees respond to such surveys. Schein asserts that culture surveys can suffer from several types of problems: i) not knowing what to ask (because without prior work one cannot know what aspects of culture actually are salient), ii) employees not being honest (because surveys often require sensitive evaluations or judgments), iii) employees not understanding the questions or interpreting them differently, iv) measuring accurate but superficial aspects of culture (because culture is really manifest in interaction and lived in the day to day), v) sampling employees who are not representative of the key culture carriers, vi) revealing aspects of culture but not their patterning as a total system, and vii) raising expectations that certain actions will be taken as a result of taking the survey (2010: 160-161).

We have seen the downsides of surveys first hand, as they are often very complex, costly, and time-consuming to administer; yet they might yield results that are by and large expected and lack the nuanced and holistic portrayal that culture deserves. In fact, in one organization studied intensively by one of the authors of this paper, the completion of a culture survey was mandatory and the organization set a goal of a very high level of participation in the survey. As a

result, mandatory group meetings were set up at which employees would complete the culture survey. When reporting back on the culture survey data, participation rate and its performance against the target was one of the first metrics reported. The culture survey exercise itself – administered in a top-down way, with an emphasis on data and metrics – was as telling, and perhaps more telling, about cultural practices, than was the content and output of the survey itself (Howard-Grenville, 2007).

That said, there are many reasons why organizations conduct culture surveys and instances in which they are appropriate. For example, it is important for many organizations to "take the pulse" of employees on a regular basis and assess trends over time. Culture surveys may readily capture how employees perceive their organization, their direct management, and workplace morale, which are important indicators that can subsequently lead to deeper conversations about organizational culture (Schein, 2010). As well, comparison between cultures may be elicited through surveys, as when joint ventures or mergers are anticipated. Finally, surveys can be used to test employee awareness of certain new initiatives and probe their knowledge of or commitment to specific changes.

One promising tool that has recently been used in academic research is a type of surveying called *cultural consensus modeling*. Cultural consensus modeling (CCM) reveals patterns of cultural knowledge, divulging relationships between particular aspects of culture as well as identifying groups who hold consistent or divergent understandings of culture (Weller, 2007). For example, cultural consensus modeling might reveal how knowledge about and commitment to an organization's innovativeness is aligned with knowledge about and commitment to collaboration, and it might show how this relationship differs systematically between R&D and marketing groups. To do this, CCM relies, unlike other survey techniques, on prior in-depth qualitative research to learn what cultural beliefs or frames are prevalent and put into action within an organization. Then, a survey instrument is developed to assess the degree to which individual employees agree to various statements expressive of those cultural practices. The survey also collects demographic data (e.g., membership in a certain group, certain occupation, etc.), in order to reveal how cultural knowledge is patterned in relation to the demographics of interest (Weller, 2007). For example, one of the authors of this paper utilized CCM to map the cultural knowledge regarding sustainability as held by various companies in the Pacific Northwest wine industry (Lahneman, 2015). She found that vineyard organizations who participated in an environmental certification program were more knowledgeable, on average, about the industry-level sustainability culture; whereas those firms that did participate in an environmental certification were less knowledgeable, on average, about the industry-level sustainability culture. In this way, the CCM analysis demonstrated that cultural knowledge regarding sustainability was shared across organizations in the same industry, and that certain organizations were more or less knowledgeable than others regarding this shared culture.

It should be noted that the development, deployment, and analysis of a CCM survey is highly complex both procedurally and analytically. For these reasons, to our current knowledge, CCM remains primarily in use by academic researchers and is not yet used by consultants or organizations on their own. However, CCM analysis could yield powerful insight in settings –

Cooperation as a Cultural Construct: Use of Cultural Consensus Modeling

Keller and Loewenstein (2011) used the CCM method to assess cultural differences between how people in the U.S. and China understand and practice the concept of "cooperation." Using a survey composed of various scenarios involving cooperation in the workplace, the authors found that Chinese participants tended to view group discussion and deliberation as key components of cooperation, whereas participants from the U.S. tended to view swift action and communication as a key component of cooperation (Keller & Loewenstein, 2011). Thus, use of a CCM survey can aid in delineating cultural differences regarding how people understand important workplace constructs, such as cooperation and coordination, which could help management better understand and manage potential sources of cultural conflict.
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including those involving a regulator and members of a regulated industry – where several organizations ideally should hold convergent cultural knowledge about important constructs like trust, engagement, or responsibility.

Even the most carefully designed survey to assess employees' cultural knowledge may be of limited use in a culture change effort. This is because it is one thing to espouse new cultural beliefs, and yet another thing to instill in employees a true sense that they *can and should* act on these new cultural directives. Our work with organizations suggests that in many cases employees are held back from embracing new cultural initiatives not because they do not understand their intent, but because they do not believe that they can act in a way that will produce the desired results, or that acting in such a manner will in fact be rewarded by their coworkers and managers. We review the constructs of self- and collective-efficacy to highlight how these might be usefully applied to guiding employees through culture change.

Self-efficacy is a person's belief in her power to produce desired results at a given time (Bandura, 1977, 2011). Like organizational culture, many aspects of self-efficacy are intangible in nature, only becoming observable through the actions and interactions of employees (Bandura, 1977). Efficacy can also be shared at a collective level, whether in a subgroup or at the organization level (Nosek & Hansen, 2008, p. 554). Research on self-efficacy demonstrates that people who have higher efficacy beliefs are more likely to achieve important or desired outcomes, like, team performance, student achievement, or neighborhood safety (Goddard, Hoy, & Hoy, 2004; Tasa, Taggar, & Seijts, 2007). When related to cultural change, high self- and collective-efficacy beliefs mean that employees will believe that actions they take in line with new cultural directives will indeed lead the to the desired cultural change.

High efficacy is gleaned from four sources: mastery experience, vicarious experience, social persuasion, and affective states (Bandura, 2011; Goddard et. Al., 2004). Mastery experience refers to the efficacy that comes from learning by doing – seeing an action leading to an outcome. Training sessions, in which employees are given an opportunity to practice a new

skill, build this kind of efficacy (Bandura, 2011). We have observed the power of cultural change efforts in which employees experiment with new ways of doing things, and are given pilot projects to undertake themselves, likely leading to a sense of mastery and efficacy that might not be gleaned from, say, classroom training (Howard-Grenville et al, 2011).

Alternatively, efficacy can be built vicariously, by learning about or watching others achieve appropriate outcomes through their actions. For example, a change manager can create a formal training session that integrates vivid images or narratives of positive outcomes resulting from new practices to increase the likelihood of employees remembering how the practice is linked to outcomes (Tversky & Kahneman, 1974). Social persuasion involves an individual or group's perception of feedback or sanction in response to their performance (Goddard et. Al., 2004), suggesting that rewards or sanctions help build efficacy around certain tasks. For example, in an organization we have studied, efforts to turn around a lax "housekeeping" culture in a production facility were assisted by both modeling of desired behaviors and sanctioning of inappropriate behaviors. Finally, affective states refer to employee's level of anxiety or excitement in response to his or her own perceived performance and influence efficacy by associating high efficacy with positive emotions (Goddard et. Al., 2004).

Like cultural consensus modeling (CCM), efficacy measurement is not a common tool used by organizations in the course of evaluating and guiding cultural change. Measuring efficacy is complex; like CCM it relies on survey questions that often employ scenario-based questions in order to measure the degree to which employees share a sense of efficacy (Goddard et. Al., 2004; Weller, 2007). Scenario questions can be formulated to depict the four sources of efficacy – mastery experience, vicarious experience, social persuasion, and affective state – in order to capture a well-rounded view not only of the overall level of efficacy among employees, but also to most effective sources of building efficacy (Compeau & Higgins, 1995). Most helpful in measuring efficacy levels as inputs to cultural change would be to measure efficacy prior to and again during implementation to ascertain how efficacy levels have been affected. If efficacy levels have decreased after implementation of a cultural change initiative, managers can use the four sources of efficacy to attempt to raise efficacy levels among employees.

Even if efficacy is not measured by survey, savvy managers likely can tune into signals of low efficacy. Such signals include employees speaking about the need for cultural change and even articulating in which ways culture might change, but lacking detailed awareness of their role in the change or what they might be expected to do differently. An environment of low collective efficacy around cultural change might be characterized by a number of employees seemingly "waiting" for direction, while recognizing that change is needed. On the other hand, high collective efficacy around cultural change is not necessarily characterized by a lack of ambiguity, but by a degree of willingness of employees to trust in the change process, and a psychological safety around the group's commitment to the change and capacity to work through it (Garvin et al., 2008).

V. The Organizational Culture of Regulatory Authorities

Summary: This section points to several factors to consider when applying prior work on culture to the task of understanding and shaping the cultures of regulatory organizations.

It is important to note that much of researchers' understanding of organizational culture has been derived from work undertaken in for-profit firms and, to a lesser extent, not-for-profit organizations. Given that much of what social scientists know about culture has been derived from work in for-profit companies, we felt it important to reflect on how this knowledge might apply in the context of a public-sector regulatory organization.

A. Differences in the Control over Goal Setting

We have already touched on the importance of aligning an organization's culture with the pursuit of its goals. A difference often raised between the public and private sectors relates to the clarity of those goals and the control of senior managers over setting them. The management teams in regulatory agencies generally have less control over the goals that they pursue than they would in a public company. Regulators often must serve goals not of their own choosing (Wilson, 1989). Compounding this, governments often assign multiple goals that sometimes have conflicting policy implications to the regulatory agencies charged with delivering on them, a point discussed at more length in Chris Carrigan's paper on organizational structure. Given that regulatory agencies are often challenged by high levels of uncertainty and a multiplicity of competing goals, maintaining a culture that is in alignment with goals can be a challenge, as it implies necessarily operating with different and potentially competing cultural commitments.

B. Contending with Strong Professional Subcultures

Strong professional norms are likely to underpin the cultures present in regulatory agencies. Regulators are increasingly composed of a highly professionalized workforce that draws from a range of professional backgrounds that may have fundamental differences in terms of training and socialization. As we explained previously, occupational training and other socialization practices shape people's ways of seeing the world yielding different cognitive frames and resulting in different interpretations of what constitutes the "right" behavior or decision in a given situation. Any attempt to influence differentiated sub-cultures within regulatory agencies will need to be informed by an understanding of differences in the professional norms and underlying assumptions that may influence the behaviors of employees. Seeing culture as frames can be helpful in such settings as bridging differences between professional or occupational subcultures is then seem primarily as a task of translation, that is, related one group's frames and associated priorities to that of another.

C. Regulatory Culture also Influences the Cultures of the Regulated

Regulators must attend not only to their own cultures, but ultimately, to the cultures of the regulated companies. A regulator's central task is to influence and shape the cultures of the regulated organizations so as to align them with the achievement of goals that comport with public values. While for-profit companies need not be as concerned with understanding and

influencing the cultures of their competitors, customers, and suppliers; regulators must consider how their own cultures support or hinder their ability to influence the cultures of the firms that they regulate. This links back to our comments earlier about viewing cultures as open systems through which sets of cultural resources can move between, and bridge across, organizations to facilitate the effective transfer of information and ideas. A challenge is that a regulator's ability to gauge the cultures of those that they regulate is hindered by an inherently limited line of sight into these firms (and an adversarial positioning between the two types of organization that can inhibit efforts to expand that line of sight). In her explorations of the challenges of regulatory oversight at NASA, Vaughan (1990, 1997a, 1997b) describes how the autonomy of regulators can hinder the gathering and interpretation of the information needed during discovery, monitoring, and investigation because regulators are only able to "see" inside the boundaries of the organization through periodic site visits and through the information provided to them. Regulatory agencies must reflect on how their own culture may influence the cultures of those they regulate and the reciprocal nature of this relationship.

D. The Boundary between the Regulator and the Regulated is a Hurdle to be Overcome

To be effective, regulatory agencies must be able to detect the emergence of new risks or patterns of non-compliance. Unfortunately, regulatory agencies can find themselves buffered from their external environments, which can put them at a disadvantage in responding to technological changes in the industries that they regulate and may require different approaches to building a responsive culture. Vaughn (1997) has cautioned that advances in technology along with changes in processes and procedures can create interdependence as regulators come to rely on the regulated organizations to bring them up to speed on these changes. Thus, regulators must give thought to how to generate and potentially transfer cultural resources that would enable them to keep abreast of technological and process advances in a way that would equip them to design effective regulatory controls in a responsive manner.

Conclusion: Lessons for Guiding or Changing Culture

Summary: This final section summarizes key lessons for understanding and shaping the cultures of regulatory organizations.

If there is one simple lesson to be drawn from the vast amount of work on organizational culture, it is that, like any other aspect of organizing, culture needs explicit, mindful tending. Too often culture is regarded as a nebulous concept, one that seemingly "explains the unexplainable" practices, quirks, or rituals that pervade everyday organizational life. But managers holding this view will not be able to understand nor harness culture for its capacity to enable employees to effectively pursue organizational goals, adapt to change, and work effectively across organizational boundaries.

In this section, we summarize some overarching lessons, drawing from findings from research and practice. We draw from *each* of the three perspectives on culture introduced in Section 2 – as values, as frames, and as repertoires – and empirical work undertaken from one or more of these perspectives, to extract findings that offer guidance on how to manage or change a culture.

A recap is warranted on how cultural perspectives and paradigms feed into prescriptions for guiding culture. First, when culture is viewed as primarily inhering in values and associated taken-for-granted assumptions, observers often regard culture as highly integrated, that is, widely shared and largely undifferentiated across the organization. Cultural change in such a setting is guided by leaders, and demands top-down direction to inculcate new values.

Second, when culture is alternatively viewed as frames, or cognitive structures that shape how their adherents understand the world, observers readily invoke a differentiation paradigm, in which organizational cultures are seen as comprising multiple, more or less independent subcultures. Of course, culture can be differentiated because of history (mergers) or structure (divisions and geographical locations), not simply due to occupational differences that shape frames. Nonetheless, cultural change is viewed as more complex and perhaps evolutionary in such settings, as pressures for change can felt more saliently in some pockets of the organization than others, and responses may be similarly uneven.

Finally, if culture is viewed as a repertoire, where the emphasis is on patterned, familiar strategies of action, which nonetheless might be used differently at different times or in response to different conditions, one might regard culture as inherently at least somewhat ambiguous, and at an extreme, fragmented. Unlike a differentiated culture in which culture is unified within subcultural islands, a fragmented culture may divulge no minimal level of uniformity, even within a subcultural group. Such a scenario is rare, for even when culture is used as a repertoire to inform action, people tend to use a limited set of socially and culturally validated strategies of action. But, this alerts us to the possibility that culture change might arise spontaneously and in dispersed fashion, as people improvise and potentially develop and spread new strategies of action. Such change can only ever be uncoordinated and reactionary, suggesting it is only one part, as the others are, of effective cultural change.

What conclusions should regulatory managers draw from these three perspectives on organizational culture? We conclude with four overarching lessons that can guide regulatory officials as they manage or seek to change their organization's culture to improve regulatory performance.

The first and essential step in establishing or guiding a culture is *articulating its high level elements* – the core beliefs or actions that should both guide and ultimately be reflected in day-to day-activity. Communicating these clearly and making explicit connections to how they fit with the organization's overall goals *and* specific group/employee goals is critical to make these meaningful (Chatman & Cha, 2003). The ubiquitous vision and mission statements tacked to the copy room wall will do little on their own; they must be translated into the lives of employees so they can see how they might work. Framing and modeling are each essential to connect new cultural commitments with how people understand the world and what they (should) do in the day to day.

Second, the high level elements of a culture must be grounded in both aspirations and a solid understanding of where an organization has come from. Culture is so entwined with how

things are done in the day to day, and is frequently connected with critical events from the past (e.g., 3M's story of the invention of the Post-it note encapsulates its commitment to free thinking and experimentation that is virtually impossible for its members to imagine abandoning) (Canato et al, 2013). As a result, any effort to articulate new cultural direction must be grounded in a firm understanding of the current culture, and its strengths as well as weaknesses. Work on framing demonstrates how "old" ideas and commitments can be skillfully repurposed so they align with new priorities (Creed, Scully, & Austin, 2002; Benford & Snow 2000). Working with an existing cultural commitment to innovation, for example, to help reframe it as connected to sustainability, can be far more effective than attempting to introduce novel commitments and actions without tethering them to the existing culture (Howard-Grenville et al., 2011).

Third, regardless of how one views culture, change efforts flounder if managers and other champions of culture (or cultural change) fail to "walk the talk." *Day-to-day actions must work with not against espousals of culture*; if not, cynicism and confusion sets in and people are more likely to continue with familiar patterns of action than to exert the effort needed to change them. For example, our work at a major oil and gas company revealed that cultural change was enabled at one facility where leaders visibly sanctioned employees for behaviors that were no longer tolerated, held supervisors to new standards, and systematically sought to align rewards with new, desired behaviors. In this facility, employees "unlearned" old behaviors, enabling them to "make space" in their repertoire to learn now ones (Weber, 2005). At a different facility in the same organization, managers did not force unlearning and relearning, with the result that employees continued to use familiar strategies of action to "work around" new procedures (Bertels, Howard-Grenville, and Pek, 2015). In other settings, one might find that such top-down measures backfire; in these cases, a more subtle approach of finding champions and enabling them to seed change, model new practices, show how they work, and connect them to existing frames can be effective (Howard-Grenville et al., 2011). In professional settings this might be particularly important.

Like other types of change, cultural change needs *overcommunicating* (Kotter, 1995). Because it involves beliefs, frames, and actions, cultural change needs to be introduced and reinforced through both top down *and* bottom up measures. As well, many companies are now experimenting with appointing peer leaders as champions of culture, and enabling them to learn from each other and receive support as they work to seed and reinforce cultural change (Pek, 2015). Communication thus comes in multiple forms – written communications and videos from senior leaders, to peer to peer meetings and encounters in the day to day.

Finally, shifting a culture over time is more realistic and more successful than radical change, because cultural change is an extraordinarily long process, due to the deep-seated nature of culture. Rarely, a crisis, external scrutiny, or a merger can be a trigger for change, but managers who adopt a "marathon not a sprint" approach will be more successful. A disruptive event can provide the occasion for savvy managers to make change that has been desired (Meyer 1982), but rarely does a disruption enable a wholesale change that was previously unplanned. Managers should also consider demonstrating successful cultural change in a particular group or area and rippling out, as opposed to starting everywhere all at once. Thinking about existing subcultures (by division, group, or occupational membership) helps when considering the degree

to which new practices, procedures, or commitments need to be uniformly applied. Ideally culture will create some level of *coherent* overall "glue" in a diverse organization, but it need not (and probably realistically cannot in an organization with multiple goals) be fully *consistent*, that is, manifested in same manner everywhere. Such is the reality of an inherently messy yet important aspect of organizational life.

References

Alexander, J. C. (2004). Cultural pragmatics: Social performance between ritual and strategy. *Sociological Theory*, *22,* (4), 527-573.

Arnaud A. & Schminke, M. (2012). The ethical climate and context of organizations: A comprehensive model. *Organization Science*, 23, (6), 1767-1780.

Bandura, A. (1977). Self-efficacy: toward a unifying theory of behavioral change. *Psychological review*, *84,* (2), 191.

Bandura, A. (2000). Exercise of human agency through collective efficacy. *Current Directions in Psychological Science*, 9, (3), 75-78.

Bandura, A. (2011). On the functional properties of perceived self-efficacy revisited. *Journal of Management*, 38, 9-44.

Bechky, B.A. (2003). Sharing meaning across occupational communities: The transformation of understanding on a production floor. *Organization Science*, 14, (3), 312-330.

Bertels, S., Papania, L., & Papania, D. (2010). Embedding sustainability in organizational culture: A Systematic Review of the Body of Knowledge. Network for Business Sustainability.

Bertels, S., Howard-Grenville, J., & Pek, S. (2015). Roping in the cowboys at Oilco: The influence of culture in integrating organizational routines. Conditionally accepted at *Organization Science*.

Bozeman, B. & Kingsley, G. (1998). Risk culture in public and private organizations, P*ublic Administration Review*, 109-118.

Cameron, K. S., & Quinn, R. E. (1999). *Diagnosing and changing organizational culture: Based on the competing values framework*. Reading, MA: Addison-Wesley.

Cameron, K. S., & Quinn, R. E. (2006). *Diagnosing and changing organizational culture: Based on the competing values framework*. San Francisco: Jossey-Bass.

Canato, A., Ravasi, D. & Phillips, N. (2013). Coerced practice implementation in cases of low cultural fit: Cultural change and practice adaptation during the implementation of Six Sigma at 3M. *Academy of Management Journal*, 56, (6), 1724-1753.

Cha, S. & Edmondson, A. (2006). How values backfire: Leadership, attribution and disenchantment in a values-driven organization. *Leadership Quarterly*, 17, (1), 57–78.

Carlile, P.R. (2002). A pragmatic view of knowledge and boundaries: Boundary objects in new product development. *Organization Science*,13, 442–455.

Chatman, J.A. & Cha, S.E. (2003). Leading by leveraging culture. *California Management Review*, 45, (4), 20-34.

Chatman, J.A., Caldwell, D.F., O'Reilly, C.A., & Doerr, B. (2014). Parsing organizational culture: How the norm for adaptability influences the relationship between culture consensus and financial performance in high-technology firms. *Journal of Organizational Behavior*, 35, 785-808.

Compeau, D.R. & Higgins, C.A. (1995). Computer self-efficacy: Development of a measure and initial test. *MIS Quarterly*, 19, (2), 189-211.

Cooke, R.A. & Szumal, J.L. (1993). Measuring normative beliefs and shared behavioral expectations in organizations: The reliability and validity of the Organizational Culture Inventory. *Psychological Reports*, 72, 1299-1330.

Corley, K.G., & Gioia, D.A. (2004). Identity ambiguity and change in the wake of a corporate spin-off. *Administrative Science Quarterly*, 49, (2), 173-208.

Cornelissen, J.P. & Werner, M.D. (2014). Putting framing in perspective: A review of framing and frame analysis across the management and organizational literature. *The Academy of Management Annals*, 8, (1), 181-235.

Creed, W.E., Scully, M.A., & Austin, J.R. (2002). Clothes make the person? The tailoring of legitimating accounts and the social construction of identity. *Organization Science*, 13, (5), 475-496.

Denison, D.R. (1990). *Corporate culture and organizational effectiveness*. John Wiley & Sons: Chicago.

Denison, D.R. (2015). "Culture and Leadership Diagnostics: The Denison Organizational Culture Survey." Denison Consulting website. Accessed on 22 April 2015 from http://www.denisonconsulting.com/diagnostics/organizational-culture.

Deutschman, A. (2005). "Making change: Why is it so darn hard to change our ways?" *Fast Company*, May 2005, 52-62. Accessed on 23 April 2015 from http://www.fastcompany.com/52717/change-or-die.

Douglas, M. (1978). Cultural bias (Occasional Paper No. 35 of the Royal Anthropological Institute of Great Britain and Ireland). London: Royal Anthropological Institute.

Douglas, M. (1986). *How institutions think*. Syracuse: Syracuse University Press.

Etzioni, A. (1975). *A comparative analysis of complex organizations*. New York: Free Press.

Feldman, M.S. & Orlikowski, W.J. (2011). Theorizing practice and practicing theory. *Organization Science*, 22, (5), 1240-1253.

Garvin, D.A., Edmondson, A.C., & Gino, F. (2008). Is yours a learning organization? *Harvard Business Review*, 86, (3), 109-120.

Geertz, C. (1973). *The interpretation of cultures: Selected essays*. New York: Basic Books.

Giorgi, S., Lockwood, C., & Glynn, M.A. (2015). The many faces of culture: Making sense of 30 years of research on culture in organization science. *The Academy of Management Annals*. Accessed at: http://dx.doi.org/10.1080/19416520.2015.1007645.

Goddard, R. D., Hoy, W. K., & Hoy, A. W. (2004). Collective efficacy beliefs: Theoretical developments, empirical evidence, and future directions. *Educational Researcher*, 33(3): 3-13.

Goffee, R. & Jones, G. (1998). *The character of a corporation*. New York: Harper Collins.

Goffman, E. (1974). *Frame analysis: An essay on the organization of experience.* Boston: North Eastern University Press.

Harrison, R. (1979). Understanding your organization's character. *Harvard Business Review*, 57, (5), 119-128.

Harrison, S.H., & Corley, K.G. (2011). Clean climbing, carabiners, and cultural cultivation: Developing an open-systems perspective of culture. *Organization Science, 22*(2), 391-412.

Holton, L. (2014). "Charles O'Reilly: Finding a corporate culture that drives growth." Stanford Graduate School of Business. Accessed on 23 April 2015 from https://www.gsb.stanford.edu/insights/charles-oreilly-finding-corporate-culture-drives-growth

Howard-Grenville, J.A. (2006). Inside the "Black-Box": How organizational culture and subcultures inform interpretations and actions on environmental issues. *Organization & Environment*, 19, 46-73.

Howard-Grenville, J.A. (2007). *Corporate culture and environmental practice: Making change at a high-technology manufacturer.* Cheltenham, UK: Edward Elgar.

Howard-Grenville, J. & Bertels, S. (2012). Organizational culture and environmental action. In P. Bansal & A.J. Hoffman (Eds.), *Oxford Handbook of Business and the Natural Environment*: Oxford University Press. Pp. 194-210.

Howard-Grenville, J. & Hoffman, A.J. (2003). The importance of cultural framing to the success of social initiatives in business. *Academy of Management Perspectives,* 17, (2), 70-84

Howard-Grenville, J., Golden-Biddle, K., Irwin, J. & Mao, J. (2011). Liminality as a cultural process for cultural change. *Organization Science*, 22, (2), 522-539.

Huising, R. & Silbey, S.S. (2011). Governing the gap: Forging safe science through relational regulation. *Regulation & Governance*, 5, 14-42.

Igo, T., & Skitmore, M. (2006). Diagnosing the organizational culture of an Australian engineering consultancy using the competing values framework. *Construction Innovation*, *6,* (2), 121-139.

International Nuclear Safety Advisory Group (1991). *Safety culture*, 75-INSAG-4, Vienna: International Atomic Energy Agency.

Jaskyte, K. (2004). Transformational leadership, organizational culture, and innovativeness in nonprofit organizations. *Nonprofit Management and Leadership*, 15, (2), 153-168.

Jermier, J., Slocum, J. W., Jr., Fry, L., & Gaines, J. (1991). Organizational subculture in a soft bureaucracy: Resistance behind the myth and facade of an official culture. *Organization Science*, 2, 170–194.

Kahneman, D.& Tversky, A. (1979). Prospect theory: An analysis of decision under risk. *Econometrica*, 47, 263–291

Keller, J., & Loewenstein, J. (2011). The cultural category of cooperation: A cultural consensus model analysis for China and the United States. *Organization Science,* 22, (2), 299-319.

Kellogg, K. C. (2011). Hot lights and cold steel: Cultural and political toolkits for practice change in surgery. *Organization Science*, *22*(2), 482-502.

Kotter, J.P. (1995). Leading change: Why transformation efforts fail. *Harvard Business Review*, 73, (2), 59.

Kunda, G. (1992). *Engineering culture: Control and commitment in a high-tech corporation*. Philadelphia: Temple University Press.

Lahneman (now Boren), B. (2015). In vino veritas: Understanding sustainability with environmental certified management standards. *Organization & Environment*, 1086026615578008.

Lamont, M. (1992). *Money, morals, and manners: The culture of the French and the American upper-middle class*. Chicago: University of Chicago Press.

Lamont, M., & Small, M. L. (2008). How culture matters: Enriching our understanding of poverty. In *The colors of poverty: Why racial and ethnic disparities persist*, 76-102.

Lewin, K. (1951). *Field Theory on Social Science: Selected Theoretical Papers*. New York: Harper & Brothers.

March, J. C., & Simon, H. A. (1958). *Organizations*. New York: Wiley.

Martin, J. (2002). *Organizational culture: Mapping the terrain*. Thousand Oaks: Sage.

Martin, J., Feldman, M.S., Hatch, M.J., & Sitkin, S.B. (1983). The uniqueness paradox in organizational stories. *Administrative Science Quarterly*, 438-453.

Meyerson, D., & Martin, J. (1987). Cultural change: An integration of three different views. *Journal of management studies*, 24, (6), 623-647.

Michaels, D. (2014). Remarks by Dr. David Michaels, Assistant Secretary of Labor for Occupational Safety and Health, Whistleblower Protection Advisory Committee Meeting (Sept. 3), *available at* https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=SPEECHES&p_id=3259.

Nosek, B. A. & Hansen, J.J. (2008). The associations in our heads belong to us: Searching for attitudes and knowledge in implicit evaluation. *Cognition and Emotion*, 22, (4), 553-594.

Ortega-Parra, A. & Sastre-Castillo, M.A. (2013). Impact of perceived corporate culture on organizational commitment. *Management Decision*, 51, (5), 1071-1083.

Osborne, D. & Gaebler, T. (1993). *Reinventing Government: How the Entrepreneurial Spirit Is Transforming the Public Sector.* New York.

Ouchi, W. & Price, R.L. (1978). Hierarchies, clans, and Theory Z: A new perspective on organization development. *Organizational Dynamics*, 7, (2), 25-44.

Ouchi, W. (1981). Theory Z: How American business can meet the Japanese challenge. *Business Horizons,* 24, (6), 82-83.

Ouchi, W.G., & Wilkins, A.L. (1985). Organizational culture. *Annual Review of Sociology, 11*, 457-483.

Peters, T.J. & Waterman, R.H., Jr. (1982). How the best-run companies turn so-so performance into big winners. *Management Review*, 71, (11), 8-16.

Quinn, R. E., & Rohrbaugh, J. (1983). A spatial model of effectiveness criteria: Towards a competing values approach to organizational analysis. *Management Science*, *29*, (3), 363-377.

Reason, J. T. (1997). *Managing the risks of organizational accidents* (Vol. 6). Aldershot: Ashgate.

Sackmann, S.A. (2006). *Success factor: Corporate culture*. Guetersloh, Germany: Bertelsman Stiftung.

Sackmann, S.A. (2009). "Culture and Performance." In N.M. Ashkanasy, C.P.M. Vilderom, & M.F. Peterson. (Eds.), *The Handbook of Organizational Culture and Climate*: 2nd ed. Thousand Oaks: Sage Publications, Pp. 188-224.

Sackmann, S.A., Eggenhofer-Rehart, P.M., & Friesl, M. (2011). Sustainable Change: Long-term efforts toward developing a learning organization. *Journal of Applied Behavioral Science*, 45, (5), 521-549.

Schein, E.H. (1985). *Organizational culture and leadership*. San Francisco: Jossey-Bass.

Schein, E. H. (2010). *Organizational culture and leadership* (Vol. 2). John Wiley & Sons.

Schön, D.A. (1983). *The reflective practitioner: How professionals think in action* (Vol. 5126). Basic books.

Selznick, P. (1957). *Leadership in administration: A sociological interpretation*. Berkeley: University of California Press.

Silbey, S.S. (2009). Taming Prometheus: Talk about safety and culture. *Annual Review of Sociology*, 35, 341-369.

Smircich, L. (1983). Concepts of culture and organizational analysis. *Administrative Science Quarterly, 28*(3), 339-358.

Snow, D. A., & Benford, R. D. (1988). Ideology, frame resonance, and participant mobilization. *International Social Movement Research*, 1, 197–217.

Stathis, P. and Jacobson, C. (2009). Institutionalising Adaptive Management: Creating a Culture of Learning in New South Wales Parks and Wildlife Service. In Allan, C. and Stankey, G. (Eds.) *Adaptive Environmental Management: A Practitioner's Guide* Springer: 305-321.

Stevenson, W.B. & Bartunek, J.M. (1996). Power, interaction, position, and the generation of cultural agreement in organizations. *Human Relations*, 49, (1), 75-104.

Swidler, A. (1986). Culture in action: Symbols and strategies. *American Sociological Review, 51*(2), 273-286.

Tasa, K., S. Taggar, & G.H. Seijts. (2007). The development of collective efficacy in teams: A multilevel and longitudinal perspective. *Journal of Applied Psychology*, 92, (1), 17-27.

Trice, H. M., & Beyer, J. M. (1984). Studying organizational cultures through rites and ceremonials. *Academy of Management Review*, *9,* (4), 653-669.

Tversky, A. & Kahneman, D. (1974). Judgment under uncertainty: Heuristics and biases. *Science*, 185, (4157), 1124-1131.

Van Maanen, J. (1978). People processing: Strategies of organizational socialization. *Organizational Dynamics*, 7, (1), 18-36.

Van Maanen, J. & Barley, S.R. (1985). Cultural organization: Fragments of a theory. In P. J. Frost, L. F. Moore, M. R. Louis, C. C. Lundberg and J. Martin. *Organizational Culture*. Beverly Hills, Sage: 31-53.

Vaughan, D. (1990). Autonomy, interdependence, and social control: NASA and the Space Shuttle Challenger, *Administrative Science Quarterly*, 35, 225-257.

Vaughan, D. (1997a). Anomie Theory and organizations: Culture and the normalization of deviance at NASA. In Nicos Passas and Robert M. Agnew (eds.), *The Future of Anomie Theory*. Boston: Northeastern University Press.

Vaughan, D. (1997b). The trickle-down effect: Policy decisions, risky work, and the Challenger tragedy. *California Management Review*, 39, 1-23.

WaterStone. (2015). "Canada's 10 Most Admired Cultures." Accessed at: http://www.waterstonehc.com/cmac/about-canadas-10/10-most-admired-corporate-cultures-2005-2013

Weber, K. (2005). A toolkit for analyzing corporate cultural toolkits. *Poetics*, 33, 227-252.

Weber, K., & Dacin, M.T. (2011). The cultural construction of organizational life: Introduction to the special issue. *Organization Science, 22*(2), 287-298.

Weeks, J. (2004). *Unpopular culture: The ritual of complaint in a British bank*. Chicago: University of Chicago Press.

Wei-Skillern, J. (2004). The evolution of Shell's stakeholder approach: A case study. *Business Ethics Quarterly*, 14, 713-728.

Weller, S.C. (2007). Cultural consensus theory: Applications and frequently asked questions. *Field Methods*, 19, (4), 339-368.

WestJet. (2015). "About WestJet." Accessed at: https://www.westjet.com/guest/en/about/

Wilderom, C.P., Glunk, U., & Maslowski, R. (2000). "Organizational culture as a predictor of organizational performance." In N.M. Ashkanasy, C.P.M. Vilderom, & M.F. Peterson. (Eds.), *The Handbook of Organizational Culture and Climate*: 2nd ed. Thousand Oaks: Sage Publications, Pp. 193-209.

Wilson, J. Q. (1989). *Bureaucracy: What governments do and why they do it*. New York: Basic Books.

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Jennifer Howard-Grenville
University of Oregon Lundquist College of Business
University of Cambridge Judge School of Business

Stephanie Bertels
Simon Fraser University Beedie School of Business

Brooke Boren
University of Oregon Lundquist College of Business

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Acknowledgments

About the Authors

Jennifer Howard-Grenville is an associate professor of management at the University of Oregon's Lundquist College of Business and the Diageo Reader in Management Studies, Judge School of Business, University of Cambridge. She studies processes of organizational and institutional change and has explored the role of routines, issue selling, and culture in enabling and inhibiting change. Howard-Grenville received her PhD at the Massachusetts Institute of Technology, her MA at Oxford University, and her BSc at Queen's University, Canada.

Stephanie Bertels is an associate professor in technology, operations management, innovation and entrepreneurship at the Beedie School of Business at Simon Fraser University. She studies how organizations make the transition towards sustainability by undertaking practitioner informed research on sustainable operations, embedding sustainability and sustainable innovation. She has an undergraduate degree in geological environmental engineering from Queen's University, a master's in petroleum engineering from Stanford University, and a doctorate in business strategy and sustainability from the University of Calgary. She has worked in industry as an environmental engineering consultant with Golder Associates.

Brooke Boren is a doctoral candidate in management at the Lundquist College of Business at the University of Oregon. She researches the development and change of organizational cultures, processes, and practices toward sustainability, particularly surrounding the adoption of environmental certifications. She holds an MBA from the ESADE Business School in Barcelona, Spain, and an economics undergraduate degree from the University of Virginia.