

# Transforming the Federal Bureau of Investigation: Outcome and Process Framing in the Context of a Strategic Change Initiative

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**TRANSFORMING THE FEDERAL BUREAU OF INVESTIGATION: OUTCOME AND  
PROCESS FRAMING IN THE CONTEXT OF A STRATEGIC CHANGE INITIATIVE**

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# TRANSFORMING THE FEDERAL BUREAU OF INVESTIGATION: OUTCOME AND PROCESS FRAMING IN THE CONTEXT OF A STRATEGIC CHANGE INITIATIVE

## ABSTRACT

This twelve-year qualitative study examines how Director Robert Mueller and his senior team profoundly transformed the United States Federal Bureau of Investigation (FBI) after the 9/11 terrorist attacks. Drawing on 138 interviews within the FBI and Mueller's testimonies to Congress, we trace how the FBI shifted from being a law enforcement agency, focused on solving crimes after they occurred, to being an intelligence agency, centered on preventing attacks before they occurred. Our data uncover the critical role that cognitive framing played in the transformation: three times senior leaders reframed the FBI in ways that reflected and guided the agency's internal changes and that accounted for and shaped the reactions of internal and external stakeholders. By comparing these three reframings, we uncover a novel theoretical distinction between two different types of framing. *Outcome framing* focuses on explaining "what" an organization does and centers on the organization as optimized towards achieving specific results, while *process framing* focuses on "how" an organization undertakes its work and centers on the organization as optimized towards deploying particular processes. We explore how outcome framing and process framing serve as different but complementary elements of leading strategic organizational change.

**Keywords:** cognitive frames, process and outcome framing, strategic change.

## **TRANSFORMING THE FEDERAL BUREAU OF INVESTIGATION: OUTCOME AND PROCESS FRAMING IN THE CONTEXT OF A STRATEGIC CHANGE INITIATIVE**

I remember the briefing [on 9/11] going something like the following: “Mr. President, we have command centers that have been set up at each of the sites and we’ve started to identify the persons responsible for the attacks by their seat number.” President Bush stops me and says “Bob, that’s all well and good, and that’s what I expect the FBI to do. The FBI has done it throughout its existence. But my question to you today is, ‘*What are you doing to prevent the next terrorist attack?*’” I did not have an answer for that question. I was prepared to discuss what the FBI was doing to bring the persons to justice. I felt like a high school student who got the assignment wrong.... But it was that question that was asked daily afterwards.

- FBI Director Robert Mueller, interview with authors

On September 4, 2001, Robert Mueller was sworn in as the Director of the Federal Bureau of Investigation (FBI), only the sixth person to occupy the position in the agency’s 93-year history. One week later, terrorists crashed four airplanes into the World Trade Center towers, the Pentagon, and a Pennsylvania field, killing nearly 3,000 people. Besides inexorably shaping the course of American and world history, the aftermath of that tragic day fundamentally altered the FBI. As the Director’s quote illustrates, for almost a century prior to 9/11, the FBI had functioned primarily as a law enforcement agency oriented toward solving crimes after they occurred. Following the attacks, Director Mueller was tasked with transforming the FBI into a national security agency that could prevent attacks before they took place. The ensuing effort was a classic attempt at strategic organizational change – that is, change that involves “breaking out of a current pattern of congruence and helping an organization develop a completely new configuration” (Nadler and Tushman, 1989: 196).

Strategic organizational change presents leaders with two challenges. First, they must adapt or create internal structures that can support the development of new capabilities, routines, and processes (e.g. Lawrence and Lorsch, 1967; Thompson, 1967; Nelson and Irwin, 2014). Second, they must frame these changes in ways that resonate with stakeholders, including

employees, shareholders, and the public (e.g. Hiatt and Carlos, 2018; Kaplan, 2008; Smith, 2014). As Nadler and Tushman (1989) argued, “the positioning and labeling” – that is, the framing – “of the reorientation are critical” in driving acceptance for, and hence the success of, long-term strategic change (e.g., Bartunek and Franzak, 1988; Giorgi, 2017). How leaders manage this second challenge—the framing task—is the focus of our study.

We analyze longitudinal, qualitative data, including transcripts of Congressional testimonies and extensive interviews, to trace the transformation of the FBI over twelve years following 9/11. We draw on our data from this extreme case to ask: How did Director Robert Mueller’s framing evolve as the FBI changed in response to 9/11? Our findings highlight the evolving and interactive nature of leaders’ framing of strategic change: Director Mueller framed and re-framed the FBI in ways that both reflected and guided the agency’s internal changes, and that accounted for and shaped the reactions of internal and external stakeholders. This study’s key insight is that, during periods of profound transformation, an organization can benefit when a leader shifts from *outcome framing* (focused on explaining “what” an organization does, and centered on the organization as optimized towards the achievement of specific results), to *process framing* (focused on “how” an organization undertakes its work, and centered on the organization as optimized towards the deployment of particular processes).

### **The Framing of Strategic Change**

A large and growing body of research in strategy and organizational theory has focused on leaders’ strategic framing: that is, their “use of rhetorical devices in communication to mobilize support and minimize resistance to a change” (Cornelissen and Werner, 2014: 185). Organizational change – particularly change that demands a radical departure from the past – is often met with opposition: employees can resist or subvert intended internal shifts (e.g. Kellogg,

2011); shareholders can punish novel or controversial actions (e.g. Rhee and Fiss, 2014); governmental actors can issue regulatory disapprovals that stymie the realization of change (e.g. Hiatt and Park, 2013). As Fiss and Zajac (2006: 1173) argued, “the success of strategic change will depend not only on an organization’s ability to implement new structures and processes, but also on the organization’s ability to convey the new mission and priorities to its many stakeholders.” The act of conveying a new mission and priorities – that is, of strategic framing – is thus a critical aspect of leadership during times of change (Daft and Weick, 1984; Gioia and Chittipeddi, 1991).

Research on strategic framing is often grounded in the sociological concept of frames (Cornelissen and Werner, 2014). Actors see the world through cognitive frames: “schemata of interpretation” (Goffman, 1974: 21) or knowledge structures that help them filter, order, label, and make sense of the past and the future (Snow, Rochford, Worden, and Benford, 1986; Snow and Benford, 1992). Actors’ cognitive frames affect their strategic decision-making, including by limiting their attention to certain aspects of the environment (Dutton and Jackson, 1987; Barr, Simpert, and Huff, 1992), constraining their search for solutions (Gavetti and Levinthal, 2000), driving responses to crisis (Kaplan, 2008), and shaping approaches to new opportunities (Kaplan and Tripsas, 2008; Benner and Tripsas, 2012; Hiatt and Carlos, 2018).

Cognitive frames affect the success of strategic change in two ways. First, whether or not an organization enacts strategic change in response to an environmental shock depends on leaders’ ability to shift their frames, or their interpretations of the organization’s identity, practices, capabilities, and strategy (Barr et al., 1992; Eggers and Kaplan, 2013; Raffaelli, Glynn, and Tushman, 2019). Like any cognitive structure, frames can be rigid and slow to adapt, and leaders often “struggle...to wrestle themselves away from their prior cognitive frames”

(Cornelissen and Werner, 2014: 190). Salient examples of firm failure – including Polaroid’s failure to commercialize a digital camera (Tripsas and Gavetti, 2000), Smith Corona’s inability to translate its success in typewriters into an advantage in personal computers (Danneels, 2010), Blockbuster’s attachment to its brick-and-mortar stores (Raffaelli et al., 2019) – resulted from leaders’ inability to shift their cognitive frames.

Second, whether or not an organization’s stakeholders accept or resist strategic change depends on how leaders communicate their frames. Because it often disrupts an organization’s identity and strategy, strategic change can leave employees, shareholders, regulators, and partners struggling to understand why it has occurred, and what it might mean for the organization’s future and their own roles (Greenwood and Higgins, 1996; Huy, 2002). Thus, during times of profound transformation, successful leaders communicate change in ways that either reassure stakeholders that their frames are intact or provide a new frame to guide sensemaking (Daft and Weick, 1984; Nadler and Tushman, 1989; Gioia and Chittipeddi, 1991; Cornelissen and Werner, 2014; Giorgi, 2017).

Identifying the attributes of successful framing during times of change has been a central focus of research on social movements. Strategic framing is an essential tool deployed by social movement actors, who use rhetorical devices and linguistic strategies to bring attention to particular issues, justify controversial practices, and hence motivate potential members or affect social change (Elsbach and Sutton, 1992; Benford and Snow, 2000; Suddaby and Greenwood, 2005). Successful movements frame issues and practices in ways that are complementary with the beliefs and values of their broader social context (Snow et al., 1986; Creed, Scully, and Austin, 2002). For example, by framing grass-fed beef as authentic, sustainable, and natural, activists spurred demand for this new market category (Weber, Heinze, and DeSoucey, 2008).



Powerful actors can also present issues by constructing and promoting novel frames that introduce new norms (Gray, Purdy, and Ansari, 2015; Gurses and Ozcan, 2015). For instance, by propagating anti-alcohol frames, the Women’s Christian Temperance Union promoted changes in social norms around drinking, and created opportunities for soft drink entrepreneurs (Hiatt, Sine, and Tolbert, 2009).

Within organizations, leaders can justify and rationalize change by framing it in ways that resonate with stakeholders. Effective framing provides stakeholders with concrete, vivid, easy-to-understand ways to make sense of what (and why) change is occurring (Fiss and Zajac, 2017). Gioia and Chittipeddi (1991) showed how, by framing a set of dramatic changes as consistent with the goal of becoming a “top 10 public University,” a University President built internal buy-in and support. In particular, stakeholders can come to accept even controversial changes if they are framed as consistent with a desirable outcome: employees supported outsourcing when it was framed as an effort to protect valuable jobs (Huy, 2002); shareholders accepted the adoption of poison pills if they were framed as enhancing shareholder value (Rhee and Fiss, 2014). To be accepted, however, these frames need to correspond with actual practices (Reay, Chreim, Golden-Biddle, Goodrick, Williams, Casebeer, Pablo, and Hinings, 2013; Giorgi, 2017). For example, employees of two pharmaceutical firms questioned leaders’ attempts to justify their merger as promoting a new discipline of *theranostics* because this frame appeared disconnected from their prior work; their resistance led to a legitimacy crisis and, ultimately, a break-up of the companies (Vaara and Monin, 2010).

We contribute to the research on the framing of strategic change by investigating how Director Mueller’s framing evolved as the FBI changed in response to 9/11. We extend prior theories of framing by examining a unique case of strategic framing through a period of

organizational shock and transformation. In doing so, we develop constructs that have not been “transparently observable” in less extreme settings (Eisenhardt, 1989: 537). Three aspects of our case allowed us to unearth previously-untheorized ideas. First, the environmental shock (Meyer, 1982) of 9/11 was so extreme that FBI leaders were forced to respond rapidly and resolutely. Following 9/11, Director Mueller and his leadership team had to both enact and frame extensive changes quickly. Second, leaders’ responses were scrutinized and constrained by the reactions of multiple stakeholders. The FBI’s mandate and responsibilities were determined by the President and the Attorney General; its budget was controlled by Congress; and, as a highly visible and important organization, it was subject to extreme criticism in the press. Hence the pressure to develop a framing that could resonate with multiple audiences was strong. Finally, because of our unique access to the Director, members of the FBI, and Congressional archival records, we were able to examine how Mueller’s framing was “constructed, deconstructed, and reconstructed” over more than a decade (Gray et al., 2015: 118).

We develop a model highlighting how Director Mueller moved from *outcome framing* to *process framing* to rationalize and justify the FBI’s changes following 9/11. To summarize, in the direct aftermath of 9/11 (2001-03), Director Mueller’s framing broke from the FBI’s legacy in law enforcement and instead centered on the Bureau as a national security agency oriented towards the achievement of a new outcome: the prevention of terrorist attacks. Although this framing responded to immense pressure for immediate action, it also caused stakeholders to question the FBI’s competence in counterterrorism. Thus, between 2003 and 2007, Director Mueller re-framed the FBI to emphasize both its law enforcement and national security mandates. While this framing assuaged concerns about competence among stakeholders (e.g., members of Congress and existing FBI agents), it led to contestation as external and internal

stakeholders began questioning the sustainability of the FBI's changes. In response, between 2007 and 2013, FBI leadership instituted a series of changes that would help institutionalize a new process (the "intelligence cycle") to guide both the agency's criminal and national security work. At the same time, Director Mueller articulated a novel framing that integrated the FBI's historical and new mandate by emphasizing that the same process – a "threat-based, intelligence-led approach" – was a foundation for both. This new framing was accepted by both external and internal stakeholders, and provided a foundation for the FBI's future development.

We contribute to the literature by highlighting the novel distinction between *outcome framing* and *process framing* in the context of strategic change. We build new theory on the characteristics, benefits, limitations, and sequencing of outcome and process framing, and we discuss how this new categorization can help us make sense of and even reinterpret findings from prior studies. More broadly, we propose that the basis of a leader's framing – outcome, process, or some other attribute – shapes the efficacy of a change effort. In developing our ideas, we reinvigorate a processual and interactive, rather than static perspective on the framing of strategic change (Benford, 1997; Cornelissen and Werner, 2014; Gray et al., 2015), and propose new theory on the role of leaders in shaping and rationalizing organizational transformation.

## **METHOD**

### **Data Sources**

We collected comprehensive interview and archival data on the FBI's evolution following 9/11 (see Table 1). We interviewed 138 FBI leaders and employees, including the entire senior leadership team, as well as front-line special agents, intelligence analysts, and supervisors. We conducted two interviews and seven annual, recorded, and transcribed follow-up conversations with Director Mueller. We conducted 42 individual interviews with leaders and

employees at FBI Headquarters, as well as ten interviews with Special Agents in Charge (SACs) and Assistant SACs in five FBI field offices. Given the challenges associated with scheduling individual meetings with FBI employees, we also conducted 19 team interviews with 85 individuals (in teams of four or five) in the field offices. Each interview lasted approximately one hour, was semi-structured (Corbin & Strauss, 2008), and emphasized understanding the individual's account of major changes at the FBI. Longstanding FBI security policies prevented recording devices in many of the FBI facilities where we conducted our interviews; therefore, we relied on extensive handwritten notes. We visited FBI offices 12 times, making six visits to the Headquarters in Washington, D.C., and six visits to five field offices across the United States. The typical office visit lasted for ten hours. After each visit, we compiled our extensive handwritten notes and created summary sheets (Yin, 2008). This process led to 232 pages of notes that were used in our analysis.

We complemented our interviews by analyzing archival sources, for two reasons. First, while our interviews and field visits generated insight into FBI leaders' and employees' perspectives on the organization's transformation, we also hoped to capture Director Mueller's framing of change, which was best captured in the archival material. Second, because our field research commenced five years after the 9/11 attacks, we drew on archival sources to triangulate our findings. Our primary archival source was the Congressional Record. Available digitally and in print, the Congressional Record documents the daily proceedings of Congress, including Congressional testimonies. During his tenure at the FBI, Director Mueller regularly testified before Congress. Although the FBI is part of the executive branch of the U.S. government and, therefore, reports to the President, Congress exercises considerable oversight over the Bureau, especially related to the agency's budget. When testifying before Congress, Director Mueller

spoke at length about the FBI's challenges and accomplishments to date, as well as the agency's mission, strategy, and identity. Through our interviews, we learned that external and internal audiences, including members of the President's budgetary team and FBI employees, often paid close attention to Mueller's Congressional testimonies because they regularly revealed the Director's strategic and operational plans. Consequently, as we repeatedly heard, Director Mueller and senior FBI leaders put great effort into wording Congressional testimonies; they understood the testimonies served as a communication device for the Director to explain the rationales for changes to Congress as well as to members of his own organization.

Using the Congressional Record's online platform, we compiled a database of all of Director Mueller's appearances before Congress. Organized by date, this database included three types of data, all gathered manually from the digitized Congressional Record. These data included Director Mueller's opening testimonies as submitted for the record; transcripts of the questions that members of Congress posed to Mueller during each session as well as his replies; and the questions submitted to and answered after-the-fact by Mueller. In total, we compiled 166 files and over 1,000 pages of text. Finally, we collected extensive publicly available data, including articles published in major newspapers about the FBI between 2001 and 2013.

[Insert Table 1 about Here]

## **Data Analysis**

The analytical approach we employed can be described as analytic abduction (Peirce, 1955). Because our primary goal was to extend theory, we iterated between our empirical data and preexisting theoretical constructs (e.g., Weber, Heinze, & DeSoucey, 2008), including frames and framing. As themes became salient, we iterated between data and existing theory to evaluate the trajectory of the FBI. Our foundational understanding of the internal transformation of the FBI during the period from 2001-2013 was shaped by our analysis of our interview notes

and field notes. We began data analysis by constructing a detailed history that captured the FBI's major internal changes during this period. To validate this history, the Bureau allowed us to review this account with top executives, a group of roughly 100 headquarters' staff, and with a gathering of the Special Agents in Charge of all 56 offices.

Next, we turned to the archival material to consider Director Mueller's framing of this history. Using QSR NVivo, we coded the transcripts of all of the Director's testimonies. We coded: 1) how the Director justified and rationalized each internal change; and 2) how he defined or labeled the agency as a whole. By investigating the evolution of these codes, we uncovered patterned differences in his framing over time, and across three phases. In particular, we recognized a shift in the Director's focus from explaining "what" the FBI (as an organization) was doing to "how" the agency was doing those things. We conceptualized these what and how statements as either *outcome* or *process*-oriented, respectively. As we conducted successive rounds of coding, we also looked for rhetorical patterns that helped us differentiate outcome and process framing. For example, we coded sentences, statements, and/or paragraphs that primarily used the past tense or the future perfect tense; past tense statements (e.g., "we completed...") were often associated with activities that Director framed as *outcomes*, whereas future-perfect tense statements (e.g., "we will have...") often signaled the Director was framing up a *process* to implement and institutionalize change.

Our analysis generated a model that illustrated both the FBI's internal changes and Director Mueller's framing of the changes over time. In our last stage of analysis, we enfolded stakeholder reactions by coding the text of Congressional Q&A, as well as our publicly available data. In so doing, we analyzed how stakeholders both responded to and shaped Director

Mueller’s framing in patterned ways. This approach led to the development of our conceptual model, presented in Figure 1.

## **CONTEXTUAL BACKGROUND**

Before presenting our findings, we offer a history and contextual overview of the FBI, along with a summary of changes that took place in the agency after 9/11.

### **The FBI before 9/11**

Before 9/11, the FBI’s law enforcement mission overshadowed its occasional forays into national security or domestic intelligence. (See Table 2 for a distinction between law enforcement and intelligence.) The FBI was founded in 1908 as part of the Department of Justice (DOJ), which prosecutes federal crimes and represents the United States in legal matters. The FBI’s image was forged through episodes related to law enforcement, including a successful campaign in the 1930s against gangsters such as Al Capone and a dramatic battle in the 1960s and 1970s against the American mafia. J. Edgar Hoover, who served as Director of the FBI from 1924 to 1972, held a law degree, as did all five of his successors. Throughout its history, the FBI occasionally engaged in domestic intelligence activities (for instance, searching for potential spies during WWII, and monitoring and disrupting the Communist Party throughout the Cold War). But its domestic intelligence responsibilities remained circumscribed and were even considered controversial. By the end of the Cold War, the FBI focused squarely on solving crime, both domestically and abroad. Fittingly, a *New York Times* profile of Director Mueller following his confirmation hearings in the summer of 2001 carried the headline “A Man Made for Law Enforcement” (Lewis, 2001).

[Insert Table 2 about here]

Reflecting its historical mission, between 1908 and 2001 the FBI focused on arresting and convicting individuals who had broken federal laws, not on gathering domestic intelligence. The heroes of the Bureau were its special agents, who organized their work around cases corresponding to specific crimes committed within their regions. According to our interviews, a typical agent was “a person of action” with “little tolerance for bureaucracy,” and who longed to be “on the street,” working a case. In 2000, the FBI assigned 76% of its agents to criminal cases, roughly 21% to counterintelligence, and just 2% to 3% to counterterrorism (DOJ, 2003). Of the FBI’s 12,730 convictions in 1998, more than half involved drugs, bank robberies, and bank fraud; only 37 were related to terrorism. In the years leading up to 9/11, the FBI rarely shared intelligence information with the U.S. Central Intelligence Agency (CIA), a separate agency tasked primarily with foreign intelligence gathering (DOJ, 2003).

Mirroring the traditionally local nature of most crime, the FBI operated from 56 field offices in major cities. A Special Agent in Charge (SAC) heading each field office enjoyed considerable autonomy. At Headquarters in Washington, DC, personnel were organized by programs like public corruption, narcotics, and white-collar crime, and provided only light-handed coordination across offices. The need for coordination was reduced by an “office-of-origin” system allowing a field office that started an investigation into a matter to stay with it even if it expanded beyond one geographic area. For instance, the New York Field Office first indicted Osama bin Laden in 1998 and thus became the hub for all bin Laden cases through 9/11.

In sum, before 9/11 the law enforcement mission of the FBI shaped its structures, systems, processes, and culture.

### **The FBI’s changes following 9/11**



The 9/11 attacks made clear, dramatically and tragically, that the FBI would have to move beyond law enforcement. Between 2001 and 2013, Director Mueller instituted a number of changes, summarized in Table 3, to strengthen the FBI's competencies in national security and intelligence. The rest of this section outlines these changes but purposely avoids discussing how Director Mueller *framed* the changes; shifts in framing will serve as the focus of our findings.

Immediately following the attacks, Mueller reorganized Headquarters so that all counterterrorism and counterintelligence activities were merged under a newly-appointed Executive Assistant Director (EAD), responsible for leading the effort to enhance the FBI's analytical and intelligence capabilities. For terrorism cases, Mueller terminated the office-of-origin system and instead empowered a newly-created Office of Intelligence at Headquarters to oversee all such cases. In May 2003, he established another new organizational unit at Headquarters – a Directorate of Intelligence – to help reinforce these counterterrorism efforts. In 2005, following a Congressional recommendation, these organizational units were merged into a single National Security Branch (NSB) that encompassed the Counterterrorism and Counterintelligence Divisions and the Directorate of Intelligence.

[Insert Table 3 about Here]

Mueller also instituted changes in the FBI's allocation and hiring of employees, and its connection to local law enforcement authorities and other agencies. By June 2002, the FBI had doubled the number of agents committed to counterterrorism to around 2,000. The Directorate of Intelligence also focused on building a cadre of intelligence analysts tasked with integrating and disseminating intelligence information. Distinct from special agents, the analysts did not develop informants, make arrests, or carry weapons; many had advanced degrees and backgrounds in military intelligence, and all received specialized intelligence training. Between 2001 and 2006,

the number of analysts in the FBI more than doubled, from 1,023 to 2,161. Mueller also dramatically increased the number of joint terrorism task forces (JTTFs) bringing together FBI agents and local authorities, and developed a number of intelligence initiatives to promote coordination with other agencies (including the College of Analytical Studies, launched with the CIA to offer intelligence courses, and the National Counterintelligence Group, bringing together executives from multiple agencies).

Finally, Mueller instituted changes to the processes deployed within each field office. Many of the FBI's new analysts were placed in field offices, not at headquarters. In 2003, the Directorate of Intelligence established a Field Intelligence Group (FIG) in each field office—a set of analysts and agents instructed to analyze and disseminate intelligence gathered in their field office, to serve as a central point of contact with headquarters on national security issues, and to coordinate intelligence across offices. In 2007, Director Mueller launched a Strategic Execution Team (SET) of almost 90 agents and analysts focused on standardizing and upgrading the FIGs. In early 2008, he also launched a series of Strategy Performance Sessions (SPSs)—periodic videoconference check-ins to review, standardize, and upgrade each office's intelligence processes. The result was the development of a standardized but flexible model through which all FIGs and field offices enacted both their national security and law enforcement mandates.

## **FINDINGS**

With this context as background, we structure our findings around a model that traces how Director Mueller's framing developed as these changes were enacted at the FBI (summarized in Table 4 and illustrated in Figure 1). The model centers on three phases of transformation at the FBI. We summarize the three phases of framing and then devote a subsection to the detailed findings in each phase.

[Insert Table 4 and Figure 1 about Here]

In phase one (2001-03), Mueller framed the FBI's changes as necessary for the agency to achieve a new national security *outcome*: the prevention of terrorist attacks. This framing was stimulated by immense pressure to act. Following 9/11, stakeholders called on the FBI to take immediate and dramatic action, leading FBI leaders to identify a new objective for the agency. But stakeholders reacted to this framing by questioning the grounding of the new outcome – a recasting of the FBI as a national security organization – in the FBI's actual capabilities and practices; that is, by contesting the FBI's competence in pursuing its new objective.

In response, in phase two (2003-07), FBI leaders instituted changes to distribute intelligence capabilities throughout the organization. During this period, Mueller's framing shifted as he rationalized these actions by drawing on both new and old *outcomes*: he continued to emphasize the Bureau's national security objective while reaffirming his commitment to its historical goal of law enforcement. In turn, stakeholders reacted by contesting the long-term feasibility of pursuing two separate outcomes, and hence the sustainability of the FBI's changes.

The resulting tensions both between the FBI and its external stakeholders, as well as within the Bureau, led FBI leaders in phase three (2007-13) to make changes that would institutionalize a new intelligence *process*. Labeled the "intelligence cycle," this process provided a standardized but flexible model that guided how employees – including both agents and analysts – organized their national security and law enforcement work, and thus integrated the two mandates. To support these changes, Mueller constructed a new, process framing. This framing re-cast the FBI as a "threat-based, intelligence led" organization, highlighting "how" the Bureau undertook its work – rather than emphasizing "what" outcomes it sought to achieve. This process framing integrated the FBI's past with its future and was accepted by both external and

internal stakeholders. Below, we detail the Director's changing framing, and illustrate his shift from outcome in phases one and two to process framing in phase three.

### **Phase one (2001-2003): Introducing a new outcome framing**

***Stimulus: Pressure to act.*** In the days and months immediately following 9/11, Director Mueller faced tremendous stakeholder pressure to undertake rapid, extensive change. The Bureau responded to the attacks by launching its largest investigation to-date, directing almost half of its agents to follow more than half-a-million leads to identify the hijackers and their sponsors. But, in the aftermath of the attacks, FBI leaders also found themselves facing calls from the President, Attorney General, and Congress to enact changes that would allow the agency to prevent the next terrorist attack. In November 2001, Attorney General John Ashcroft recalled that the FBI faced a “mandate for fundamental change” (Eggen and McGee, 2001). In a memorandum to the heads of all DOJ components, including the FBI, he summarized:

The inhumane acts of Tuesday, September 11 make evident that the central thrust of our campaign against terror must be *proactive prevention and disruption*, and *not primarily reactive investigation and prosecution*. We cannot wait for terrorists to strike to begin investigations and make arrests. *We must prevent first and prosecute second.* (emphasis added)

***Response: Identifying new objectives.*** In response to this pressure, in May 2002, Director Mueller issued a new list of the FBI's top ten priorities, starting with “protect the U.S. from terrorist attack,” and directed all field offices to give that top priority all the resources it needed before allocating any resources to lower priorities. Mueller declared that the FBI would track down every terrorism lead it received; in a testimony in June, he explained, “simply put, our focus is now one of prevention” (6/27/2002). The changes enacted during this period (see Table 3) reflected a shift towards the prioritization of newly-identified outcomes related to counterterrorism: Headquarters was re-organized so that counterterrorism efforts could be

centrally managed, coordinated, and prioritized; agents were tasked with focusing on counterterrorism cases rather than criminal cases; JTTFs were shored up to ensure better collaboration with external actors focused on counterterrorism. In an interview in 2009, Director Mueller referred to this period as one of “triage,” because it involved the re-prioritization of the FBI’s objectives and the development of structures that could support new objectives. In 2011, he summarized how, during this time, “the FBI began the process of creating a national security focus and aligning the organization to address this priority” (10/6/2011).

***Framing: A new outcome framing.*** We found that, between 2001 and 2003, Director Mueller’s communications focused on the FBI’s commitment to national security and, specifically, the prevention of terrorist attacks. This articulation represented a break from the FBI’s historical priorities. For nearly a century, FBI leaders had defined the Bureau as a law enforcement agency. In 1907, United States Attorney General Charles J. Bonaparte testified before Congress for the initial funding of the FBI. In this seminal testimony, Bonaparte framed the FBI’s activities in the context of several outcomes related to law enforcement:

The attention of the Congress should be, I think, called to the anomaly that the Department of Justice has no executive force, and, more particularly, no permanent detective force under its immediate control. I venture to recommend, therefore, that provision be made for a force of this character. It seems obvious that the Department on which not only the President, but the courts of the United States must call first to secure the enforcement of the laws, ought to have the means of such enforcement subject to its own call. (FBI historical archives)

Subsequent Directors echoed Bonaparte’s framing. For instance, in 1993, Director Louis Freeh began his tenure by stating: “*Law enforcement* is at the forefront of our national interest” (FBI historical archives; emphasis added). Similarly, when testifying before Congress during his confirmation hearings in the summer of 2001, Director Mueller framed the FBI as “the finest *law enforcement agency* in the world” (6/30/2001; emphasis added).

But, immediately following 9/11, Mueller’s use of the term “law enforcement” subsided. Instead, he increasingly framed the FBI as an agency oriented towards the outcome of “national security.” For instance, in June 2002, he described how:

I am directing a series of changes to strengthen the FBI's national management and oversight of counterterrorism, counterintelligence, and cyber-crime investigations and programs. These cases and investigations are critical to the very foundation of the FBI's ability to *protect national security*. (6/6/2002; emphasis added)

During this period, Mueller justified the FBI’s changes as oriented towards the achievement of a new, concrete outcome: the prevention of terrorist attacks. As he testified in 2002: “First, and foremost, the *FBI must protect and defend the United States against terrorism* and foreign intelligence threats” (6/6/2002, emphasis added). Mueller frequently referenced this new outcome in explaining the reasoning behind each of the FBI’s changes. In 2002, for instance, he testified how the FBI’s “new course” was “mandated by the *paramount mission of prevention of terrorist attacks*” (6/21/2002; emphasis added). Similarly, in 2003, he testified that: “The FBI is undergoing momentous changes – including the incorporation of an enhanced intelligence function – that will allow us *to meet the terrorist threat head-on*” (2/11/2003; emphasis added).

In summary, during this period, Director Mueller’s framing broke from the FBI’s past by centering on the need to pursue a new outcome. During this period, however, Mueller’s testimonies offered little guidance about how the outcome would be achieved; no dominant themes emerged about *how* to achieve these results. Table 5 provides additional evidence of the new outcome framing that consumed most of Mueller’s statements during this initial phase.

[Insert Table 5 about Here]

### **Phase two (2003-2007): Accommodating old and new outcome framing**

***Stimulus: Contesting competence.*** Director Mueller’s drastic reframing of the FBI led some stakeholders to contest the FBI’s actual competence in national security and intelligence.

Historically, the FBI had developed practices and capabilities appropriate for a law enforcement agency optimized towards solving crimes: identifying suspects, engaging in forensics, driving arrests and convictions, and so on. The emphasis on a new outcome naturally called into question whether the agency could be competent in both law enforcement and counterterrorism. As the contrasts in Table 2 suggest, an organization well-designed for law enforcement might struggle to conduct the domestic intelligence required for counterterrorism. We found that, following 9/11, Congressional Q&A revolved around the FBI's ability to achieve its new counterterrorism objective. For instance, during a 2004 hearing with Director Mueller, Senator Judd Gregg questioned the FBI's ability to pursue its counterterrorism goal:

The obvious question is, if counterterrorism is your number one responsibility now and if you have got 12,000 agents overall – first, why are we only dedicating 2,500 to the effort? And number two, why haven't we been able to move the full complement into this arena, and is that a reflection of the fact that there is still some... significant desire or feeling amongst the line agents that they want to do things other than counterterrorism... *They were brought up for 20 years, 30 years, 15 years in white collar crime and chasing the mafia and finding out who robbed the bank.*" (3/23/2004; emphasis added)

In 2004-2005, a Presidential Commission assessed the FBI's progress since 9/11. While praising some of the FBI's strides, the Commission concluded that "the *FBI's law enforcement legacy is strong*" and that "the FBI is still *far from having the strong analytic capability* that is required to drive and focus the Bureau's *national security work*" (Commission on the Intelligence Capabilities of the United States [CICUS], 2005: 453-455). Echoing the opinion of CICUS, stakeholders expressed concern that, despite the Director Mueller's changes, the FBI was (in the words of Congressman John Sweeney) "slipping back into some old patterns" (3/17/2004). Encapsulating these concerns, Senator Diane Feinstein pointedly expressed skepticism about the FBI's ability to conduct "national security which is really intelligence-driven:" "The question... [is] really whether you can change the culture sufficiently" (4/8/2005).

***Response: Distributing capabilities.*** During this period FBI leadership directed a series of internal changes aimed at distributing intelligence capabilities throughout the FBI to strengthen its competence in counterterrorism (see Table 3). For example, the creation of a Directorate of Intelligence and a National Security Branch (NSB) at Headquarters, suggested by CICUS, was envisioned as an attempt to ensure counterterrorism was prioritized at the very top of the organization. At the same time, the hiring of new analysts and the establishment of FIGs in each field office were intended to ensure intelligence capabilities existed throughout the organization. In an interview, Director Mueller described this period as one oriented towards “the building of intelligence foundations”; reflecting back, he testified how the effort to distribute capabilities was necessary to ensure “the FBI’s national security functions have matured internally” (9/13/2011).

***Framing: Old and new outcome framing.*** As he worked to distribute the FBI’s intelligence capabilities between 2003 and 2007, Director Mueller began to co-mingle the FBI’s historical and new outcome framing. In contrast to the previous period, when he framed changes as a radical departure from the Bureau’s past, he now emphasized how the FBI’s changes were grounded in and would strengthen both its law enforcement and national security mandates. For instance, in March 2005, he noted that the establishment of the Directorate of Intelligence “leverages our *traditional law enforcement skills*” (03/08/2005; emphasis added). At the same time, he continued to underscore the Bureau’s new outcome objectives by refocusing on national security. For example, in March 2006, he described the development of the NSB and other recent changes as “designed to enhance the capability of the entire FBI to support *its national security mission*” (3/28/2006; emphasis added). In 2006, he elaborated how the Bureau aimed to accommodate two primary outcomes:



So while... we understand our responsibility is to *keep the United States safe from terrorists*, from weapons of mass destruction, we have not in any way forgotten our responsibility to the people of the United States *in our criminal programs*. (3/28/2006; emphasis added)

Consistent with this idea, our coding revealed that Director Mueller increasingly communicated the results the FBI had achieved in both law enforcement and counterterrorism. Mueller's testimonies throughout this period contained frequent references to precise metrics: numbers of investigated cases, arrests, and convictions; number of intelligence reports generated, potential terrorists identified, and plots disrupted. He framed these metrics as quantifiable evidence of the FBI's successful achievement of its two outcomes. For instance, in 2006, Mueller presented data on the FBI's progress in achieving its law enforcement mandate:

Over the last two years, the FBI has convicted more than 1,060 government employees involved in corrupt activities, including 177 federal officials, 158 state officials, 360 local officials, and more than 365 police officers. (12/6/2006)

In the same testimony, he also presented results related to the FBI's support of the US military, in tracking down terrorists developing improvised explosive devices in Iraq and Afghanistan, by using the FBI's existing forensics capabilities:

TEDAC [the FBI's Terrorist Explosive Device Analytical Center] has successfully made 56 positive identifications of bomb makers since beginning operations.... Overall, as of August 2006, the TEDAC has received over 8,670 submissions from Iraq and Afghanistan. It has developed in excess of 2,500 latent prints with over 450 matches and associations that have forensically connected one TEDAC device to another through device construction, latent prints, trace evidence (both hairs and fibers) and by DNA. (12/6/2006)

Later, in 2007, he testified how the Bureau's changes had thwarted several terrorist attacks:

[Our efforts] have been essential in breaking up terrorist plots across the country, from Portland, Oregon; Lackawanna, New York; Torrance, California; and Chicago, to the recent Fort Dix and JFK Airport plots. (7/26/2007)

In summary, during this phase, Director Mueller’s framing centered on the FBI as an agency optimized towards the achievement of two distinct outcomes. Table 4 provides supplemental quotes illustrating his use of both old and new outcome framing during this time.

### **Phase three (2007-2013): Developing a new process frame**

*Stimulus: Contesting sustainability.* By framing the FBI’s recent changes as strengthening both its historical and new outcomes, Director Mueller helped assuage stakeholders’ concerns about the agency’s competence. But the emphasis on two distinct, seemingly unconnected outcomes fueled a new set of apprehensions related to the FBI’s ability to pursue both over the long term. That is, stakeholders responded to phase two’s framing by contesting the sustainability of the FBI’s new dual mandate, resulting in a period of profound tension both between the FBI and its stakeholders and within the agency.

We found that, beginning in 2007, Congressional Q&A began to increasingly revolve around whether the FBI’s counterterrorism efforts were (in a term frequently evoked by Congressional members) “cannibalizing” its traditional mandate. While prior questions focused almost exclusively on the FBI’s competence in national security, Director Mueller’s phase-two framing – by re-introducing references to the FBI’s traditional objectives – invited a notably increased number of questions about potential conflicts between old and new objectives. For instance, in 2008, Senator Richard Shelby asked:

I agree that terrorism is the highest priority and represents the gravest threat to national security. I think it’s also *shortsighted for us to continue to cannibalize the criminal side of the FBI...* Mr. Director, are you satisfied that the FBI is reaching the right balance in resources between its national security and the criminal investigation missions or could you do more with more resources? (4/16/2008; emphasis added)

In prior periods, Congress had considered breaking up the FBI into a law enforcement and a counterterrorism agency by establishing a separate “American MI5.” Citing the “FBI’s hybrid

nature [as] one of its strengths” (CICUS, 2005: 466), CICUS had rejected the idea. But, around 2007, stakeholders increasingly contested one agency’s long-term ability to engage sustainably in both law enforcement and counterterrorism without sacrificing one or the other. Senator Christopher Bond explained the tension that resulted from the Director’s emphasis on two distinct outcomes:

We... send mixed messages about what we want the FBI to be. As soon as the Intelligence Committee finished berating the FBI for not moving fast enough on intelligence reform, the Judiciary Committee... berates them for not paying enough attention to kidnappings and violent crimes. (10/23/2007)

During this period, we noted that several external stakeholders intensified calls for the FBI to be broken into two agencies, thus expanding the cadre of longstanding proponents for the idea. For instance, a former Justice Department official argued:

It makes less and less sense for one agency, the FBI, to be grappling with Internet-savvy Al Qaeda terrorists while also dealing with drug trafficking, insider trading on Wall Street, copyright violations and industrial espionage.... Almost all other democracies that face terrorist threats divide internal security from domestic law enforcement. Britain has MI5; France has its Direction de la Surveillance du Territoire; Israel has Shin Bet. We can learn from their experiences, *dividing the FBI into a traditional law enforcement arm and a separate, independent counter-terrorism unit.... The FBI’s current organizational culture is fundamentally incompatible with foreign intelligence and with war....* our leaders in the executive branch and Congress could... ask whether it is time for a *breakup and spinoff* of the FBI. (Yoo, 2007; emphasis added)

The tension between the dual outcomes of law enforcement and counterterrorism was also relayed by internal stakeholders. In interviews, FBI employees recalled having to seek guidance on whether (or how) to prioritize between the two goals because they found few answers in Mueller’s fragmented phase-two framing. For instance, the Bureau’s newly-established FIGs were tasked with bringing together analysts and agents who would manage, execute, and coordinate intelligence. But each field office was told to set up a FIG quickly, with little central assistance. As a result, analysts and agents lacked direction on how to integrate and

embed their work within each group and across each field office. A veteran agent described the outcome:

Nearly every FIG was different. Some were conducting high-end strategic analysis, but many were supporting the tactical casework of squads—analyzing the telephone calling patterns of suspects, for instance.

Lacking a unified framing that could help integrate their work, both agents and analysts felt the goals and roles of the other group were being prioritized, and they questioned the sustainability of their collaboration. As one analyst reflected in an interview:

The relationship between intelligence analysts and agents can be tricky because *we have different goals*. We are gathering intelligence; they are pursuing an arrest. The two goals don't always converge.

For instance, intelligence analysts struggled to establish credibility within the FBI; some reported being viewed as second-class citizens and told to fetch coffee for agents. Looking back on this period in 2011, Director Mueller testified that, within the FIGs, “many of the intelligence analysts were being utilized to support the tactical needs of individual cases, rather than being the engine driving strategic collection requirements and, in turn, operations” (9/13/2011). Conversely, agents working on conventional law enforcement cases, previously the heroes of the FBI, felt their value was diminished in a country where Congress and news outlets focused on terrorist threats.

***Response: Institutionalizing a process.*** In response to these external and internal tensions, Mueller recognized that the FBI would need to do more to, as he recalled, “increase collaboration between intelligence and operations” (9/13/2011). As a senior FBI official described in an interview, in prior periods:

The Director had identified a set of important shifts the Bureau needed to undertake, but the shifts only described the desired end-state. They didn't tell us how to get there. We needed to convert the shifts into a management process.

Thus, between 2007 and 2013, FBI leaders introduced a series of changes aimed at institutionalizing a process that could underlie and thus integrate the Bureau's law enforcement and national security work (see Table 3). These included the launch of a Strategic Execution Team (SET) and the development of Strategy Performance Sessions (SPSs). The nearly 90-person SET team visited field offices, identified best practices among FIGs, codified models of FIGs in a 61-page document, and developed a single model under which all FIGs would function (adjusting for the size and complexity of their field offices). Through the SPS meetings, Mueller and his executive team reviewed each office's progress and provided feedback on how it could refine its work.

The result was the development of a new process, labeled the "intelligence cycle," that was to guide both criminal and counterterrorism work within the agency. At the core of the process were two practices: an emphasis on threats, and a reliance on intelligence. Historically, an agent would open a case in reaction to an incident or tip. Such a case might lead to an arrest but might leave dangerous gaps in the FBI's understanding of potential terrorist and criminal threats. In contrast to this old approach, the new model urged each field office to analyze threats in its region and then shift agents toward the gravest threats – whether related to law enforcement or counterterrorism. Once threats were identified, special agents were tasked with collecting and disseminating information. Analysts then converted the information into intelligence that might lead either to action related to law enforcement (e.g., an arrest) or national security (e.g. the identification of a potential attack), or to recognizing that additional information was required. Analysts gave agents "requirements"—questions to sources or surveillance to be undertaken—and agents collected new information

to fulfill those requirements. In an interview, an SAC described how this process was at the core of the FBI's work:

At a deep level... [it] makes sense. The FBI has so many things to do, we have to set priorities.... [The process] helps us establish priorities based on the underlying threats we face, not the crimes that happen to occur.

During this period, the FBI also changed the scope of its law enforcement activities to fit the intelligence cycle. Classes of crimes differed in how well they lent themselves to an intelligence-led approach. Cybercrime, for instance, was international and networked and could be led effectively by intelligence. Local drug cases and bank robberies, in contrast, were best resolved using a reactive approach. The new process helped agents recalibrate their law enforcement work to favor activities that fit well with an intelligence-led approach. For example, agents began referring most bank robbery investigations to local authorities.

In summary, by the end of our period of study, Mueller and the FBI's senior leadership team had developed a single process that integrated the work of a law enforcement and a national security agency. In a 2008 testimony, Director Mueller described this shift:

Special agents have previously depended on several sets of guidelines to guide their investigations.... Different rules therefore governed different types of investigations. *These included different rules for national security investigations versus criminal investigations....* The result [of our recent changes] is a *single set of guidelines* that are reconciled, consolidated, and, most importantly, simplified. *No longer will there be different rules for different types of investigations.* (9/16/2008; emphasis added)

Testifying in 2009, he summarized the new model, and described how it fundamentally changed the way the FBI functioned:

Following SET's recommendations, the FIGs now conform to one model, based on best practices from the field, and adapted to the size and complexity of each office. Each FIG has well-defined requirements for intelligence gathering, analysis, use, and production.... As a result of these changes, the analysts and agents in the FIGs collect intelligence more completely, analyze it more quickly, share it more widely with others who need the information, and take action on it more effectively.... With this integrated model, we can turn information and intelligence into knowledge and action. (9/30/2009)

*Framing: A new process framing.* During this period, Director Mueller once again developed and deployed a new label for the FBI that reframed the agency’s mandate. At a meeting of all SACs in 2006, attended by one of the authors of this study, Mueller first framed the FBI in a new way: as a “*threat-based, intelligence-led*” organization. After 2007, this novel label increasingly supplanted Mueller’s framing of the FBI as oriented towards “law enforcement” or “national security.” In 2011, for instance, he described how: “the FBI has taken significant steps since 9/11 to transform itself in to a *threat-based, intelligence-led agency*” (6/8/2011; emphasis added).

Two elements of this new framing were notable. First, rather than describing the FBI as an agency optimized towards the achievement of specific outcomes, Mueller framed it as an agency deploying a specific process. That is, the “*threat-based, intelligence-led*” framing highlighted *how* the FBI took action and conducted its work: by concentrating on threats rather than cases, and by leveraging intelligence capabilities throughout its operations. In describing the Bureau’s recent changes, Mueller emphasized how they were essential in moving the agency towards a different mode of operation and a new mindset, rather than framing the changes as oriented towards the achievement of specific goals. For example, in 2008, he testified:

We established a Strategic Execution Team (SET) to help us assess our intelligence program, evaluate best practices, decide what works and what does not work, and then standardize it across the Bureau. The purpose of the SET is to accelerate improvements to our intelligence capabilities, to *ensure we are an intelligence-driven organization* and to *drive a change in mindsets throughout the FBI.* (9/16/2008; emphasis added)

As this quote illustrates, Mueller had begun to reframe the FBI’s mandate and changes as the successful adoption of a set processes – a way of acting – rather than the achievement of a

specific set of outcomes. In a Testimony delivered to commemorate the 10<sup>th</sup> anniversary of 9/11, Mueller emphasized how the FBI post-9/11 sustained this new approach:

Protecting the United States against terrorism demanded *a new framework for the way the FBI carries out its mission: a threat-based, intelligence-led approach*. Rather than collecting information to solve a particular case, the new approach prioritizes the collection and utilization of intelligence to develop a comprehensive threat picture.... Under this new model, intelligence drives how we understand threats, how we prioritize and investigate these threats, and how we target our resources to address these threats (9/13/2011; emphasis added).

In 2013, he underscored how the FBI was defined by a process, rather than a set of outcomes:

Today's FBI is a *threat-driven, intelligence-led organization*. We have built a workforce and leadership team that view *continuing transformation as the means* to keep the FBI focused on key threats to our nation. (6/19/2013; emphasis added)

Second, this new framing integrated the FBI's historical and new mandates. In 2009, the Director described today's FBI as "a stronger organization, combining *greater intelligence capabilities* with a longstanding commitment to *protecting the American people from criminal threats*" (5/20/2009; emphasis added). In an internal memo to employees, he wrote:

When we talk about "threats to national security," we are *not focused only on terrorism, foreign intelligence, and weapons of mass destruction*. A national security threat is one that tries to challenge the very foundations of American society, involving dangers so great that no local authority can handle them alone. It includes gangs that cause violence and disorder in cities, cybercrimes and transnational criminal enterprises that are borderless and have the potential to cause widespread disruption, white collar crimes that undermine the strength of our economy, and corruption that tears at the fabric of our democracy.

Similarly, in 2009, Mueller testified that: "Our objective is to defeat national security and criminal threats by operating as a single *intelligence-led operation*, with *no dividing line between our criminal and counterterrorism programs*" (3/25/2009; emphasis added). In a 2011 testimony, he framed the FBI in a way that both underscored the threat-based, intelligence-led process, and that integrated its two objectives:



Since 9/11, the FBI has shifted to be an *intelligence-led, threat-focused organization, guided by clear operational strategies*. The FBI is focused on predicting and preventing the threats we face while engaging the communities we serve.... The FBI, as an organization, is in a unique and critical position to address *national security and criminal threats that are increasingly intertwined*. (4/6/2011; emphasis added)

As these quotes illustrate, through this framing, Mueller referred back to the FBI's heritage to bridge the Bureau's past with a new future.

Over time, Director Mueller began using this process framing to justify almost all of the changes the FBI had undergone since 9/11 (see Table 4 for additional evidence). Changes, including those that were previously framed as helping achieve law enforcement or national security objectives, were now rationalized as related to specific processes that had helped FBI agents address threats and leverage intelligence. For instance, looking back in 2011, Mueller testified:

Since 9/11, the FBI has dramatically shifted our intelligence program and capabilities to *address emerging threats*. We stood up the National Security Branch, created a Directorate of Intelligence, integrated our intelligence program with other agencies in the intelligence community, hired hundreds of intelligence analysts and linguists, and created Field Intelligence Groups in each of our 56 field offices. In short, the FBI improved and expanded our intelligence collection and analytical capabilities across the board.... We recognize that we must continue to refine our intelligence capabilities to stay ahead of these changing threats. *We must function as a threat-driven, intelligence-led organization* (4/6/2011; emphasis added).

### **Results: A transformed FBI**

We found that Director Mueller's process framing was largely accepted by external and internal stakeholders. By 2013, the FBI had undertaken a set of momentous changes. While interviewees stated that the ultimate results of the transformation effort were unlikely to be clear for years, the United States had not experienced a major terrorist attack since 9/11, a critical accomplishment. At the same time, the Bureau's achievements in law enforcement remained undiminished. Notably, despite the magnitude of these changes, we found little contestation over

their content – or over the Director’s framing of the FBI as a “threat-based, intelligence-led” organization – in the final period of our study.

Instead, Director Mueller’s process framing was increasingly echoed by both external and internal stakeholders. In 2017, for instance, Director Mueller received an award from the Intelligence and National Security Alliance (INSA), a nonprofit association of intelligence leaders, that credited him with transforming the FBI into a “*threat-based, intelligence-led national security organization*” (INSA, 2017; emphasis added). Two years earlier, in 2015, Congress released a second report assessing the FBI’s progress since 9/11. The new report was far less critical than the 2005 CICUS report and tasked the FBI primarily with “accelerat[ing] the pace of its reforms and transformation of its culture” (9/11 Review Commission, 2015: 108). Notably, the wording of the report reflected an acceptance of Director Mueller’s process framing. The summary of the Commission’s findings began with: “Over the past decade, the Bureau has made measurable progress building a *threat-based, intelligence-driven national security organization*” (108), and concluded with: “The FBI has made strides in the past decade but needs to accelerate its implementation of reforms to complete its transformation into a *threat-based, intelligence-driven organization*” (118). Reflecting on the report, Mueller’s successor, FBI Director James Comey, remarked:

I think this is a moment of pride for the FBI.... An outside group of some of our nation’s most important leaders and thinkers has stared hard at us and said, ‘You have done a great job at transforming yourself.’ They’ve also said what I’ve said around the country: ‘It’s not good enough.’....There are a lot of ways you can be even better. (Schmidt, 2015)

Director Mueller’s process framing was also accepted internally. In many field offices, supervisors could point to examples where intelligence regarding threats had guided action in both counterterrorism and conventional law enforcement. For example, a veteran agent described how the development of an intelligence cycle changed and guided his work:

I used to get complaints about potential cybercrimes from the public and [would] then try to set priorities in a reactive way. Now, I'm getting out in front of the crimes, understanding the threats and identifying gaps [in intelligence]. I'm asking, "What don't I know?"

Although some tensions between agents and analysts remained, most individuals we interviewed appreciated the logic of a framing that emphasized their shared process. In fact, in interviews with FBI executives and veteran agents, we often heard the refrain, "The FBI has always been an intelligence organization." Supporters pointed to specific, iconic criminal investigations in which intelligence had been used effectively. For example, some highlighted the FBI's success in battling the New York mafia by identifying, mapping out, infiltrating, and prosecuting five central crime families. We found that Directors after Mueller continued to deploy this framing. Director Comey, for example, described the agency as "a *threat-based, intelligence-driven* organization" (9/17/2014); his successor, Christopher Wray, framed it as a "global, *threat-focused, intelligence-driven* organization" (12/7/2017). In 2019, the first sentence of the "About" section on the FBI's website described the agency as "an *intelligence-driven and threat-focused* national security organization with both intelligence and law enforcement responsibilities" (FBI, 2019). Reflecting on the Bureau's changes during an INSA summit, Director Wray reflected that he was impressed with the extent of the FBI's transformation into a threat-based, intelligence-led organization:

The degree to which intelligence analysts are integrated with case agents in everything from the basic training to the day-to-day cadence of the place is really remarkable.... It's become much more of a way of life, day in, day out, in a way that I think is impressive. (FBI, 2017)

Table 6 presents additional evidence of the acceptance of Director Mueller's process framing.

[Insert Table 6 about Here]

## DISCUSSION

This study contributes to literature at the intersection of cognitive frames and strategic change (e.g., Barr, Stimpert and Huff, 1992; Clark, Gioia, Ketchen, and Thomas, 2010; Eggers and Kaplan, 2013) by examining how leaders respond to radical environmental jolts (Meyer, 1982) that require urgent and robust action (Sine and David, 2003). Our unusual access to the FBI, an organization traditionally shrouded in secrecy, fostered several generalizable insights related to the critical role that cognitive framing plays in the context of strategic change.

Our findings expose the unique role that framing, based on outcome and then process, played in the transformation of the FBI following the 9/11 terrorist attacks on the United States. Immediately after the attacks, the President, Congress, and the members of media called on FBI Director Robert Mueller to rebalance the Agency's priorities toward national security while simultaneously maintaining its commitment to law enforcement. Such a mandate refocused the FBI's activities on national security and tasked agents with anticipating an attack *before* it happened. Doing so shifted the FBI's primary focus away from its historical emphasis on law enforcement, where agents had been expected to investigate crimes *after* they had been committed. During this first phase, from 2001 to 2003, our findings revealed that Mueller communicated these changes by employing new outcome frames that focused on the specific goals, outcomes, and metrics related to national security and preventing future terrorist attacks. These new outcome frames helped the Director and his team communicate the need to reallocate organizational resources toward counterterrorism, centralize the agency's decision-making structures, and ensure greater control over the flow of information.

After the initial shock of 9/11 had subsided, however, Congress and the media began to question whether the FBI had the appropriate skills and capabilities to manage dual-mandates of

counterterrorism and law enforcement simultaneously (e.g., Andriopoulos and Lewis, 2009; Smith, 2014). In response, a second phase emerged, between 2003 and 2007, when Mueller relied on old and new outcome frames to communicate how the FBI *could* attend to national security and law enforcement goals concurrently.

In a subsequent third phase, we found stakeholders intensified their focus on asking normative questions about whether the FBI's *should* be responsible for both strategic mandates on a more permanent basis (c.f., Zajac, Kraatz and Bresser, 2000). To address these questions, the Director made a notable shift in how he framed the need for subsequent long-term changes at the FBI; from 2007 to 2013, he began to frame his messaging in terms of process. Whereas the Director's prior outcome frames had focused stakeholder attention on achieving outcomes and measurable results related to 9/11, this later shift toward process framing refocused the agency's transformation efforts toward designing processes for new capability development, creating new systems and structures, and constructing new meanings associated with the FBI's strategic mandate. A focus on "how" to take action (i.e., process framing), rather than on "what" results to pursue (i.e., outcome framing), also helped to legitimize and institutionalize a new process-based approach for the FBI: "threat-based, intelligence-driven security." This new strategic mandate combined elements of law enforcement and intelligence to create ongoing processes for keeping US citizens safe from harm. We discuss the implications of these findings below.

Our study advances work on cognitive framing to account for how outcome framing and process framing serve as essential elements of strategic change and organizational transformation. Outcome framing concentrates primarily on what results to pursue through action (e.g., outputs; the extent of proposed change, measures and metrics). Process framing in contrast focuses on how to take action (e.g., capability development, creating systems and structures,

cultivating meaning and infusing values). In prior work, scholars have implicitly evoked elements of outcome frames, but neither outcome nor process framing has been explicitly theorized in the literature on cognitive framing and strategic change. This seems surprising since Nadler and Tushman (1989) offered an oblique reference to outcome frames in their early research on organizational reorientation:

The most effective reorientations include a fully developed description of the desired future state.... This description is more than a statement of objectives or goals; it is a vision of what the organization hopes to be once it achieves the reorientation.

Reflecting on the prior literature on framing through our outcome and process lens, it appears researchers may have maintained an implicit bias toward outcomes as frames, giving far less attention to process. For example, Fiss and Zajac (2006: 1176) addressed how senior leaders prioritized (outcome) frames that attended to “boosting shareholder value.” Gavetti and Rivkin (2007) highlighted the role that frames play in setting clear distinctions between competitors. And Benner and Tripsas (2012) illustrated the importance of framing the definitions of new products to consumers. Likewise, in our study, Director Mueller primarily emphasized outcomes in the initial phases of the FBI’s transformation; his immediate focus related to national security and law enforcement objectives and metrics. However, the twelve-year longitudinal nature of our data exposed a subsequent and critical role for process framing. By shifting his framing toward the development of various internal processes, Mueller refocused internal and external stakeholder attention on the actions required to institutionalize new capabilities and structures into the FBI’s values and meaning systems. Our study’s temporal lens sheds light on the critical role that outcome and process framing played in facilitating this change. We outline these conceptual distinctions in Table 7 and discuss their implications for future research below.

[Insert Table 7 about Here]

## **Theorized Benefits of Outcome and Process Framing**

Both outcome and process framing of strategic change offer several benefits in our study. First, social movement theorists, especially those anchored in the interpretive and social constructionist traditions, offer evidence that frames advancing common goals and outcomes (i.e., social movements associated with a similar purpose or political objective) can mobilize, inspire, and coordinate action among disparate actors (Benford & Snow, 2000; Bradbury & Clair, 1999; Rao, Monin, & Durand, 2003; Weber, Heinze, & DeSoucey, 2008). This tradition provides a wealth of examples that demonstrate how social movement leaders rely on outcome framing to mobilize actors in support of various forms of social and market-related changes. Notable examples include patient care outcomes in health care (Kellogg, 2009), financial outcomes in emerging markets (Sine & Lee, 2009), practice adoption outcomes in the environmental sector (Lounsbury, Ventresca, & Hirsch, 2003), and regulatory policy change outcomes in geographic regions (Schneiberg & Bartley, 2001). Our work builds on this tradition and highlights that outcome framing may be even more important in the hours, days, and weeks following a crisis event.

Second, outcome frames appear especially beneficial when leaders are tasked with focusing their organization's attention on the immediate required capabilities needed to address the task at hand. Indeed, a recent review of the cognition and capabilities literature suggests that "having a 'central objective' is the starting point for capability development" (Helfat and Peteraf, 2003, in Eggers and Kaplan: 2013: 305). Likewise, in our study, 9/11 provoked an immediate need for the FBI to focus its attention on preventing the next terrorist attack, a central objective that would require capabilities associated with intelligence gathering, data analytics, and counterterrorism. Only later—in line with Eggers and Kaplan's (2013: 305) theorizing—did

“intentional processes,” routines, “and understanding of what those actions mean” begin to filter their way into the FBI’s longer-term capability development agenda.

Third, outcome framing helps leaders articulate which products and services should receive immediate resources and attention within the organization (Benner and Tripsas, 2012), especially in the wake of unexpected crises (Clearfield & Tilcsik, 2018), technology discontinuities (e.g., Anderson & Tushman, 1990), or environmental jolts (e.g., Sine & David, 2003). Alternatively, effective outcome framing can also clarify what *not* to do, and therefore, ameliorate divergent views that often emerge among stakeholders about what actions to take (e.g., Rhee and Fiss, 2014) in these situations. Finally, outcome frames have been shown to help organizational leaders determine which competitors should receive increased attention and scrutiny (e.g., Gavetti and Rivkin, 2007). In our case, the FBI’s initial focus on preventing the next terrorist attack led agents to coordinate with members of other US intelligence agencies (e.g., the Central Intelligence Agency, the National Security Agency, the National Security Council, and local law enforcement agencies) in ways they had not before 9/11.

Whereas outcome framing may be best suited to help leaders prioritize and inspire initial action, we posit that process framing offers a distinct set of benefits to leaders of strategic change. According to McAdam, McCarthy and Zald (1996:2), frames serve as the “collective *processes* of interpretation, attribution, and social construction that mediate between opportunity and action” [emphasis added]. Our findings supported this claim, illustrating how process framing pushed various internal and external stakeholders to step back and think about how to design the operational systems and meaning systems that would support the national security demands that emerged within the FBI after 9/11.



Our study also distinguished a role for process framing, a construct that has roots in several forms of extent theory and can offer novel pathways for advancing work at the intersection of cognition and strategic change. We see several promising links between our findings and prior work associated with process theorizing. First, a rich tradition of process-based change research has highlighted the importance of communicating and understanding the emergence and diffusion of new practices and organizational changes over time (Langley, Smallman, Tsoukas and Van de Ven, 2013: 1). Research in this vein devotes attention to the importance of process in bringing new ideas into practice, emphasizing the need for habituation routines and meaning-making activities (e.g., Reay et al., 2013; Sonenshein & Dholakia, 2012).

Second, a cognitive shift toward process (Langley & Tsoukas, 2016) has been shown to facilitate organizational members' capacity to tackle on-going problem definition and interpretation and, in turn, promote practice continuity among organizational members (Entman, 1993; Grey et al, 2015). Gehman, Trevino and Garud's (2013) study of the development of a business school honor code articulated how material and social processes are required to engage actors in a change effort over time. Likewise, a focus on process can help leaders infuse values and communicate meaning beyond the technical aspects of the tasks at hand (Selznick, 1957); drawing on the Selznickian tradition of institutional leadership, scholars have theorized that processes of "value infusion" are critical for maintaining a connection with the organization's past while enacting organizational change (Besharov & Khurana, 2015; Raffaelli & Glynn, 2015). Our study extends this work, suggesting insights into the role that cognition and process framing play in shaping processes of strategic change.

Third, we found Mueller's process framing helped FBI employees redefine longstanding professional norms and professional identity claims during the agency's transformation (c.f.,

Czarniawska, 1997; Suddaby & Greenwood, 2005). Mueller's process framing appeared to reinforce new professional norms that expanded a special agent's goals beyond the siloes of law enforcement or national security to encompass a broader set of activities that held dimensions of each. In interviews, we heard how process framing served as a critical element that helped FBI members reframe the nature of their work. As Mueller shifted his focus to communicating how to enact the process of "threat-based, intelligence-led" activities, organizational members began to refocus their efforts on building capabilities and meaning systems that would expand the prior definitions they attached to their professional identity and training. Process framing also appeared to have helped Mueller involve his senior team and organizational members in a dialogue required to begin reframing the FBI's core activities. This cognitive shift elevated creative problem-solving processes over prior professional norms associated with the training agents had received in either law enforcement or counterterrorism. In this regard, Mueller's use of process framing corresponded with prior research that has suggested the importance of asking individuals to "[re]interpret their situation and devise remedies and proposed lines of action" (McAdam and Scott, 2007:16) rather than adhere to embedded professional training norms that can make it difficult to "drop your tools" (Weick, 1996: 301).

### **Theorized Limitations of Outcome and Process Framing**

Our study also highlights how outcome and process framing have distinct limitations for leading strategic change. Although outcome framing proved to be an effective way for Mueller to prioritize critical activities within the FBI after 9/11, prior work has cautioned that a leader's overreliance on outcome framing can postpone or even "delimit attention to a portion of reality" (Giorgi & Weber, 2015) necessary to enact other critical aspects of change. Selecting the wrong outcome frame may lead to organizational lock-in or reinforce misaligned priorities tied to the

organization's past (Danneels, 2011; Tripsas & Gavetti, 2000). Additionally, scholars have cited the critical role that leaders can play in communicating and disseminating frames to organizational members (Carton et al, 2014; Reger, et al, 1994); but in some circumstances, outcome framing may prove ineffective if the leader is less capable of communicating a vision or inspiring action linked to a set of measurable results (e.g., Yukl, 1999). Similarly, outcome frames may be susceptible to "blurry vision bias," a condition where leaders communicate a vision using abstract rhetoric (Carton & Lucas, 2018: 2106); but in the context of leading in crisis, doing so may have the unintended consequence of leaving organizational members confused about the direction, intended results, or end-state of a change effort. Finally, outcome frames may foster politicization and framing contests among various stakeholder groups which have been shown to impede organizational strategic decision making (Kaplan, 2008). Framing contests can place additional burdens on the senior team to resolve the tensions within the organization (Gilbert, 2006).

Process framing is likely to have its own limitations for leading strategic change. Although process framing helped Mueller communicate gradual changes to help FBI agents define aspects of their professional identity, scholars have shown that identity reconstruction can evoke conflict (Glynn, 2000) and strong emotional reactions among members at all levels of the organization (Huy, 2002; Vuori & Huy, 2016). Thus it is especially important for leaders to consider how framing processes "graft" new technical knowledge into existing professional norms (Nag, Corley, & Gioia, 2007: 587). In addition, because process framing addresses "how" to take action, such messages are likely to expose interdependencies within an organization's existing social and hierarchical structures (Gulati & Puranam, 2009; Gulati, Puranam, & Tushman, 2012); if a leader's reliance on process framing overly simplifies complex

coordination challenges across disparate business unit activities (Lawrence & Lorsch, 1967), members may lose confidence in the change effort. Finally, process framing may also distract organizational members from focusing on the necessary actions and outcomes needed to achieve initial quick wins and to gain momentum for a change effort (Kanter, 1983).

### **Contributions and Future Research**

As noted above, a key element of our theorizing is to distinguish between outcome and process framing. Whereas scholars have typically focused on outcome framing, longstanding process ontologies point to the world as being “made of processes rather than things... continually in a state of becoming” (Langley, et al: 5). Our findings build on this tradition, suggesting that process framing also serves as a critical aspect of strategic change. Our analysis theorizes a distinct role for outcome and process framing, along with the benefits and limitations of each, in the wake of an environmental jolt or change.

Our study also answers recent calls to extend the notion of cognitive frames beyond their prior “static” representations and to theorize a more dynamic conceptualization (Benford, 1997; Cornelissen & Werner, 2014: 423). We address how a leader’s cognitive framing messages are driven by, and attempt to respond to, evolving stakeholders demands. Relatedly, our focus on multiple stakeholders—inside and outside the FBI (e.g., FBI special agents, Congress, the media, the President)—provided a novel perspective that exposed the importance of dynamic cognitive framing during periods of strategic change. Finally, our study bridges work at the intersection of cognitive framing and leadership (Weick, 1993) to account for the role that influential actors play in infusing organizations with meaning (Selznick, 1957) in the context of crisis management (James, Wooten, & Dushek, 2011).

We anticipate our work will open several pathways for future research. We see promise in further exploring the relationship between outcome and process frames and capability adoption (e.g., Eggers and Kaplan, 2013; Raffaelli, Glynn and Tushman, 2019). Related research has examined how leaders attend to structural (Tolbert and Zucker, 1983; Zajac and Shortell, 1989), temporal (e.g., Romanelli and Tushman, 1994; Eisenhardt, 1989), and emotional (e.g., Huy, 2002) dynamics when attempting to embed new capabilities into an existing organization. In a similar vein, scholars have characterized capability adoption as a gradual process – requiring prolonged efforts to obtain internal and external buy in – and often met with varying degrees of success (e.g., Gilbert, 2006; Sull, 1999; Vuori and Huy, 2016). In the case of the FBI, however, the initial impetus to adopt new intelligence capabilities required immediate action, and without the benefit of prolonged sensemaking (e.g., Vaara and Monin, 2010). Director Mueller’s initial focus on outcome frames appeared well suited to address this urgent demand, followed by process framing to help institutionalize the change. It will be worth exploring whether outcome frames are always the most effective way to spur the adoption new capabilities. In addition, our setting identified several benefits and limitations associated with outcome and process framing; however, future work is likely to expose conditions where these distinctions may prove to be more or less salient. In addition, empirical research in other contexts may find there are instances where process framing, followed by outcome framing, is more effective than the sequencing we observed at the FBI. We foresee ample opportunity to use forms of quantitative analyses to test for causal relationships that link sequences of cognitive framing to action—or alternatively, actions to framing (c.f., Weick, 1988)—in a manner that expands beyond the scope of our study’s qualitative inductive approach.

Studying outcome and process frames from the vantage of other levels-of-analysis could also open up new streams of research. For example, scholars might examine how outcome and process frames are related to market and field emergence (e.g., Kennedy and Fiss, 2009; Zuzul and Tripsas, 2019; Lee, Hiatt and Lounsbury, 2017), institutionalization (e.g., Zilber, 2002), and deinstitutionalization (e.g., Hiatt, Sine and Tolbert, 2009). Alternatively, future inquiries might go beyond top management teams (Hambrick, 2007) to consider the role of outcome and process frames for middle management (e.g., Balogun and Johnson, 2004) and employee-led (e.g., Kellogg, 2009) efforts. Studies that attend to the interaction of outcome and process frames across multiple levels-of-analysis (Hedstrom and Swedberg, 1998) also hold promise.

Our study's twelve-year temporal lens sheds light on the critical role that process framing played in the later phases of leading the FBI's strategic change; process framing helped the Director institutionalize many of the objectives espoused via his initial outcome frames (i.e., national security and law enforcement outcomes) throughout the organization. We found Mueller's sequence of outcome framing, followed by a greater focus on process framing, was relevant to how our story unfolded. In our context, it appeared Mueller may have benefited from taking initial "bold strokes" toward new outcomes, but a later shift toward process framing seemed necessary for the "long march" required to institutionalize the FBI's new organizational structures and value systems (Kanter, 1999: 20). It is worth considering if similar elongated shifts always occur between outcome and process framing in other contexts.

Viewing prior work through our lens of outcome and process framing sheds new light on related constructs and study outcomes. For example, Clark, et al. (2010) analyzed the merger of two healthcare organizations and identified an important phase that permitted an ambiguous identity to emerge among executives. According to their findings, the interim phase allowed for

multiple interpretations of what the new organization could become. From the vantage of process framing, however, one might consider how the transitional phase permitted a focus on building “lean, agile, proactive, and strategic” processes that, like identity elements, encouraged executives “to act as if the merger were going to occur” (Clark, et al., 2010: 420). We anticipate ample opportunity to evaluate how outcome framing and process framing affect other aspects of organizational identity formation and change (Gioia, Patvardhan, Hamilton, & Corley, 2013).

More broadly, alternative bases of framing other than outcomes and processes may well exist; future research might explore these other bases and their interaction with outcome and process framing. For example, future empirical analysis might disentangle relationships between framing and concepts such as organizational identity, attention-based views of the firm, and strategic prioritization processes.

Finally, we believe the interplay between outcome and process framing has important implications for managerial practice. Leaders embarking on radical change efforts face fundamental questions about how to define and communicate actions to stakeholders. The FBI’s leaders resolved this dilemma by focusing on outcome frames first, but then shifted their focus to process later. Other leaders, in different circumstances, might cope differently, but leaders facing a radical external shock are unlikely to avoid the need to deal with outcome and process frames, and the interplay between the two.

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## TABLES AND FIGURES

**Table 1:** Data Sources

<b>Interviews (2009-2010)</b>	<b>N (individuals)</b>
Senior leaders at headquarters	43
Special Agents in Charge (SAC) of field offices	10
Agents and analysts in field offices	85
<i>Total</i>	<i>138</i>
<hr/>	
<b>Conversations with Director Mueller (2006-2017)</b>	<b>N</b>
Interviews (2006, 2009)	2
Annual reflections (2010-2017)	7
<i>Total</i>	<i>9</i>
<hr/>	
<b>Office visits (2009-2010)</b>	<b>N</b>
Headquarters visits	6
Field office visits	6
<i>Total field hours</i>	<i>120</i>
<hr/>	
<b>Congressional testimonies (2001-2013)</b>	<b>N</b>
Number of testimonies	166
Pages of testimony text	1000+
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<b>Archival data (2001-2019)</b>	
Newspaper articles, FBI website, press releases, public interviews	

**Table 2: Contrasts Between Law Enforcement and Domestic Intelligence**

	<b>LAW ENFORCEMENT</b>	<b>DOMESTIC INTELLIGENCE</b>
<i>Goal</i>	Solve crimes after they occur	Prevent attacks before they occur
<i>Outlook</i>	Reactive	Prospective
<i>Unit of work</i>	A case	A threat
<i>Focal actor</i>	Agent on the street	Analyst at a workstation
<i>Measure of success</i>	Number of arrests, prosecutions, and convictions	In theory, number of events that could have occurred. In practice, difficult to measure.
<i>Critical capabilities</i>	Forensics, development of sources	Analyzing data, development of sources
<i>Organization</i>	By city or region	By type of threat
<i>Geography of typical adversary</i>	City or region	Nation or world
<i>Decision rights</i>	Decentralized; local autonomy	Centralized; national coordination
<i>Burden of proof</i>	Beyond a reasonable doubt	Worried enough to act
<i>Basis of resource allocation</i>	Inflow of cases	Threat assessments
<i>Psychic perquisites</i>	Clear closure, public acclaim, convicting criminals	No closure, invisible successes, stop criminals before they act

**Table 3: Timeline of Changes Following 9/11, 2001-2013**

<b>Year</b>	<b>Change</b>
2001	Reorganize Headquarters with an Executive Assistant Directors (EAD) responsible for Counterterrorism and Intelligence
2001	Terminate office-of-origin system for terrorism cases
2001	Create new Office of Intelligence responsible for all terrorism cases
2002	Double number of agents committed to counterterrorism
2003	Increase number of Joint Terrorism Task Forces (JTTS) from 35 to 66
2003	Appoint EAD of Intelligence reporting directly to Dir. Muller
2003	Create Field Intelligence Groups (FIGs) in each field office
2003	Create College of Analytical Studies
2005	Create National Security Branch (NSB) subsuming all intelligence activities
2006	Increase number of JTTS to 100
2006	Co-establish National Counterintelligence Working Group
2001 – 2006	Double number of intelligence analysts to 2000+
2007	Launch Strategic Execution Team focused on standardizing FIGs
2008	Launch Strategy Performance Sessions (SPSs)

**Table 4: Framing of Strategic Change at the FBI, 2001-2013: Dimensions and Representative Quotations**

	<b>Phase One (2001-2003)</b>	<b>Phase Two (2003-2007)</b>	<b>Phase Three (2001-2003)</b>
<b>Stimulus</b>	<p>Pressure to act</p> <p>“President Bush stops me and says “Bob, that’s all well and good, and that’s what I expect the FBI to do. The FBI has done it throughout its existence. But my question to you today is, ‘<i>What are you doing to prevent the next terrorist attack?</i>’” (Director Mueller, interview, 2006)</p>	<p>Contesting competence</p> <p>“After September 11, there was this incredible need to retool the FBI.... Your Congress gave you money...to <i>protect the United States of America</i> [from terrorists].... I am really concerned... <i>where in the hell are we and have we just wasted money, have we just wasted time?</i>” (Senator Barbara Mikulski, 2/3/2005)</p>	<p>Contesting sustainability</p> <p>“Do you think that the FBI has grown so much that maybe...[there need to be] two different Bureaus, <i>one for... counterterrorism and counterintelligence... and another for the criminal section?</i>” (Senator Steve Cohen, 5/20/2009)</p>
<b>Response</b>	<p>Identifying new objectives</p> <p>“The attacks of September 11th have had a profound impact on the Bureau, underscoring the urgency for the need for change. In our view, everything must be, and is, “on the table”.... Given the tragic events of September 11th, <i>a different FBI is needed with a new focus.</i> (Director Mueller, 3/6/2002)</p>	<p>Distributing capabilities</p> <p>“While we, and many of our critics, are generally satisfied with our progress in <i>building an enterprise-wide intelligence capability</i>, a healthy skepticism persists about the FBI’s ability to fully execute its plans.... As we have progressed with implementation of our Intelligence Program, we too have seen the need to <i>strengthen our intelligence organizational structure.</i>” (Director Mueller, 6/3/2004)</p>	<p>Institutionalizing a process</p> <p>“The new field intelligence model <i>challenges us to begin a new way of thinking about ourselves, and our roles and responsibilities</i> for conducting domestic intelligence.... This is not the job of one “side of the house,” but of the <i>entire Bureau....</i> We must overcome the tendency to prioritize and handle resources in program silos.” (Internal FBI document, 2007)</p>
<b>Framing</b>	<p>New outcome</p> <p>“<i>Prevention of terrorist attacks is our top priority.</i>” (Director Mueller, 6/21/2002)</p>	<p>New and old outcomes</p> <p>“Although <i>protecting the United States from terrorist attacks is our first priority</i>, we remain committed to... <i>the enforcement of federal criminal laws.</i>” (Director Mueller, 5/2/2006)</p>	<p>New process</p> <p>“Since 9/11, the FBI has shifted to be an <i>intelligence-driven, threat-focused organization.</i>” (Director Mueller, 12/14/2011)</p>



**Table 5: Director Mueller’s Framing: Dimensions and Representative Quotations**

<b>New outcome framing</b>	
<i>New outcome: prevention of terrorist attacks</i>	<p>“While the FBI's core missions remain constant, its priorities have shifted since... the terrorist acts of September 11, 2001. Under the new alignment, the FBI's focus is to: <i>protect the United States from terrorist attack; protect the United States against foreign intelligence operations and espionage.</i>” (6/6/2002)</p> <p>“The FBI’s <i>shift toward terrorism prevention</i> necessitates the building of a national level expertise and body of knowledge that can be accessed by and deployed to all field offices and that can be readily shared with our Intelligence Community and law enforcement partners.” (6/6/2002)</p> <p>“The 13 months since the September 11th attacks have been a time of great change for the Federal Bureau of Investigation. Starting immediately after the planes hit, when over half of our 11,500 agents suddenly found themselves working terrorism matters, it <i>became clear that our mission and our priorities</i> had to change.” (10/17/2002)</p> <p>“The <i>prevention of another terrorist attack remains the FBI's top priority.</i>” (3/27/2003)</p> <p>“The past 18 months have brought momentous changes to the FBI, including the incorporation of an enhanced intelligence function that will better enable us to <i>defend against the terrorist threat.</i>” (3/18/2003)</p> <p>“Mr. Chairman, to <i>effectively wage this war against terror</i>, we have augmented our counterterrorism resources and are making organizational enhancements to focus our priorities.” (3/18/2003)</p>
<b>Old and new outcome framing</b>	
<i>Old outcome: solving crimes New outcome: prevention of terrorist attacks</i>	<p>“Today, the FBI is taking full advantage of our <i>dual role as both a law enforcement and an intelligence agency.</i>” (5/24/2004)</p> <p>“Through February 2005, TSC received 21,650 calls (over 3,500 from state and local law enforcement), made over <i>11,300 positive identifications</i>, and assisted in over <i>340 arrests -- including six with a terrorism nexus.</i>” (5/24/2005)</p> <p>“The FBI had a <i>312 percent increase in the dissemination of intelligence assessments</i> from calendar year 2003 to 2004 and a <i>222 percent increase in the dissemination of Intelligence Information Reports</i> during that same period.(5/24/2005)</p> <p>“While our <i>national security efforts</i> remain our top priority, we continue to fulfill our <i>crime fighting responsibilities</i> as well.” (3/28/2006)</p> <p>“Let me close by saying that... our <i>primary responsibility remains the neutralization of terrorist cells</i> and operatives here in the United States and the <i>dismantlement of terrorist networks</i> worldwide. And while this is our first priority, we remain committed to the... <i>enforcement of Federal criminal laws.</i>” (1/11/2007)</p>

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**New process framing**

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*New process: threat-based, intelligence-led*

“These examples underscore the complexity and breadth of the FBI’s mission to protect the nation in a post-9/11 world. They also demonstrate how the FBI has evolved as a *threat-based, intelligence-driven* agency in responding to these threats, and how the FBI will meet these challenges in the years to come.” (7/28/2010)

“Since the 9/11 attacks, the FBI has transformed itself into a *threat-driven, intelligence-led* national security agency.” (3/16/2011)

“To carry out this mission, the FBI has taken significant steps since 9/11 to transform itself in to a *threat-based, intelligence-led agency*. This new approach has driven changes in the Bureau’s structure and management; our recruitment, hiring, and training; our information technology systems; and *even our cultural mindset*. These changes have transformed the Bureau into a national security organization that *fuses traditional law enforcement and intelligence missions*.” (6/8/2011)

“While identifying the objective for and building the components of an intelligence-led organization were key steps in the FBI’s transformation, transitioning this new *threat-based, intelligence-led model* into practice required additional focus and attention from management. The challenge was to get the network of offices and personnel across the country and around the globe to accept a *new mindset and approach to day-to-day operations*.” (9/13/2011)

“As *national security and criminal threats continue to evolve*, so too must the FBI change to counter those threats. We must *continue to use intelligence* and investigative techniques to find and stop criminals and terrorists before they act.” (5/16/2012)

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**Table 6: Acceptance of Director Mueller’s Process Framing**

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**External Stakeholders**

“In my former role as a county executive, I had responsibility for a county police department. . . . The FBI is an enormous *source of valuable intelligence*, not just in the national security area, in the anti-terrorism area, but also just in routine local law enforcement—drug interdiction, violent crime, and so forth. Could you just comment on successes and. . . how you feel local law enforcement is doing nationally at moving toward *intelligence-based policing*?” (Senator Chris Coons, 3/30/2011)

“As you know, when you first began to develop a National Security Division and go into the intelligence area, I doubted whether it could be done efficiently and effectively. *I believe you have done it*. I think the record indicates that. *I think the intelligence, I think the way the 56 offices operate. . .* has demonstrated that the FBI has been effective.” (Senator Diane Feinstein, 12/14/11)

“The mandate of the FBI 9/11 Review Commission, (hereafter Review Commission) is to measure the Bureau’s progress over “yesterdays” since 9/11 and to assess its preparedness for “tomorrows” in a rapidly evolving and dangerous world. To accomplish this, the Review Commission worked to determine how close the Bureau is today to its goal of becoming a *threat-based, intelligence-driven organization*.” (9/11 Review Commission, 2015)

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**Internal Stakeholders**

“Today’s FBI is a *threat-focused, intelligence-driven organization*. Each FBI employee understands that to defeat the key threats facing our nation, we must constantly strive to be more efficient and more effective.” (Director James Comey, 12/9/2015)

“This Committee has provided critical resources for the FBI to become what it is today – a *threat-focused, intelligence-driven organization*. Our Nation continues to face a multitude of serious and evolving threats ranging from homegrown violent extremists to hostile foreign intelligence services and operatives; from sophisticated cyber-based attacks to internet facilitated sexual exploitation of children; from violent gangs and criminal organizations to public corruption and corporate fraud. . . . The breadth of these threats and challenges are as complex as any time in our history. And the consequences of not responding to and countering threats and challenges have never been greater.” (Director Christopher Wray, 5/16/2018)

“The FBI is an *intelligence-driven and threat-focused* national security organization with both intelligence and law enforcement responsibilities.” (Answer to ‘What is the FBI?’ FAQ, FBI, 2019)

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**Table 7: Process and Outcome Framing: Implications for Leading Strategic Change**

	<b>OUTCOME FRAMING</b>	Related Sources	<b>PROCESS FRAMING</b>	Related Sources
<b>Characteristics</b>	<p>Cognitive focus on “<i>what</i>” aims to pursue and what actions to take, e.g.:</p> <ul style="list-style-type: none"> <li>• Outcomes and results</li> <li>• Extent of strategic change</li> <li>• Measurement and metrics</li> </ul>		<p>Cognitive focus on “<i>how</i>” to take action, e.g.:</p> <ul style="list-style-type: none"> <li>• Capability development</li> <li>• Development and maintenance of systems and structures</li> <li>• Meaning-making, identity construction, value infusion</li> </ul>	
<b>Benefits</b>	<p>Prioritizes, guides, and inspires action.</p> <p>Identifies the immediate required capabilities to solve the task-at-hand.</p> <p>Resolves divergent views among stakeholders about what actions to take.</p> <p>Clarifies the most relevant products and competitors to devote attention to.</p>	<p><i>Benford &amp; Snow, 2000; Nadler &amp; Tushman, 1989</i></p> <p><i>Eggers &amp; Kaplan, 2013</i></p> <p><i>Rhee &amp; Fiss, 2014</i></p> <p><i>Benner &amp; Tripsas, 2012; Gavetti &amp; Rivkin, 2007</i></p>	<p>Institutionalizes, legitimates, and sustains organizational change.</p> <p>Facilitates shifts in longstanding professional norms. Helps individuals order and organize past experience.</p> <p>Influences the “underlying structures of belief and perception...”</p> <p>Infuses values and meaning beyond the technical aspects of the task at hand.</p> <p>Promotes ongoing problem definition and interpretation. Promotes practice continuity by organizational members.</p> <p>Establishes sanctions for noncompliance that allow frames to persist over time</p>	<p><i>Reay et al, 2013; Clark et al, 2010</i></p> <p><i>Suddaby &amp; Greenwood, 2005; Goffman, 1981; Czarniawska, 2006</i></p> <p><i>Schon &amp; Rein, 1994:23; Gray et al, 2015</i></p> <p><i>Selznick, 1957</i></p> <p><i>Entman, 1993; Gray et al, 2015; Gehman et al, 2013; Raffaelli et al, 2019</i></p> <p><i>Gray et al, 2015</i></p>
<b>Limitations</b>	<p>May postpone or “delimit attention to a portion of reality.”</p> <p>Often reliant on the leader’s ability to communicate a vision and inspire action.</p>	<p><i>Giorgi and Weber, 2010: 333</i></p> <p><i>Reger, et al 1994; Carton et al, 2014; Rhee and Fiss, 2014</i></p>	<p>Requires complex coordination across disparate business units.</p> <p>Can threaten individuals’ perceived identity, evoking strong emotional reactions.</p>	<p><i>Lawrence &amp; Lorsch, 1967</i></p> <p><i>Huy, 2002; Vuori &amp; Huy, 2016; Nag et al, 2007</i></p>

	<b>OUTCOME FRAMING</b>	Related Sources	<b>PROCESS FRAMING</b>	Related Sources
<i>Limitations (con't)</i>	<p>Leaders may be unable to diverge from prior frames anchored in past success.</p> <p>May facilitate “blurry vision bias” (i.e., ambiguous frames related to a potential end-state).</p> <p>Conducive to politicization and internal framing contests. Competing frames may place burdens on senior teams.</p>	<p><i>Tripsas &amp; Gavetti, 2000; Danneels, 2011</i></p> <p><i>Carton &amp; Lucas, 2018: 2109</i></p> <p><i>Kaplan, 2008; Gilbert, 2006; Hiatt &amp; Carlos, 2019</i></p>	<p>May preclude organizational members from focusing on the primary actions needed to achieve initial quick wins and gain momentum.</p>	<p><i>Kanter, 2003</i></p>
<i>Timing and sequencing</i>	<p>Immediate focus</p>		<p>Intermediate and long-term focus</p>	
<i>Enactment of the frame</i>	<p>Organizational leaders</p>		<p>Organizational leaders and members</p>	

**FIGURE 1: Framing of Strategic Change at the FBI, 2001-2013**

