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An Indicator-Based Approach to Comparative Policy Analysis: Measuring Regional Governance of Migrant Integration

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ABSTRACT *This article focuses on the development and use of indicators for subnational comparative policy analysis. Taking migrant integration as an exemplary case, it offers a comprehensive and critical examination of the research process involved in creating and implementing indicators to compare policies at the subnational level. At the intersection of subnational comparative policy analysis and migration research, this article discusses the main methodological and empirical challenges to this process based on the experience of a comparative research project on measuring regional governance of migrant integration in 25 regions across 7 European countries.*

Keywords: comparative policy analysis; indicators; migrant integration; regional governance; migration governance; subnational level

Introduction

Comparative policy analysis has traditionally focused on comparisons between countries at the national level. However, we are currently witnessing a fundamental shift in scholarship, with researchers increasingly engaging in the comparative study of subnational jurisdictions, both within and across countries (Snyder 2001; Giraudy et al. 2019; Sellers 2019). This shift is driven by a growing interest in understanding subnational variations in policy design, effectiveness and implementation, and the factors influencing these differences (Schmidtke 2014; De Coninck and Solano 2023). In line with decentralising trends and the rise of subnational authorities (Hooghe et al. 2016; Trinn and Schulte 2022), the rescaling of policy analysis to subnational jurisdictions reflects a recognition of the importance of studying subnational policymaking in various policy fields such as education (e.g. Segatto 2017; Yan et al. 2023), the environment (e.g. Jones 2014; Millar et al. 2021), migration and migrant integration (Wolffhardt et al. 2019; Yilmaz et al. 2023) and social policy (e.g. Niedzwiecki 2018; Tillin 2022). Across these policy fields, comparing subnational units within and across countries presents methodological and empirical challenges. First, subnational jurisdictions often lack the administrative capacity to produce their own data or assess the effectiveness of their policy interventions (Yilmaz et al. 2023). Second, researchers frequently face limitations in terms of resources and the capacity to collect data across multiple countries, creating barriers to comparative subnational policy analysis (Manatschal et al. 2020; Yilmaz et al. 2023). The emergence of policy indicators as a tool for gathering data on policy outputs across subnational units helps to overcome the challenges of data availability, as well as the lack of comparative analytical frameworks (Solano and Huddleston 2021).

This article offers a comprehensive examination of the research process for building and applying indicators at the subnational level, scrutinising the main challenges this process entails. We use the regional governance of migrant integration (hereafter "regional integration governance") as an exemplary case to anchor our examination in the real challenges that researchers face. Governance of migrant integration has become a highly relevant policy field for subnational jurisdictions, but migration and migrant integration research has traditionally paid little attention to the meso or regional level (Hepburn and Zapata-Barrero 2014), and subnational cross-country comparisons are rare (Manatschal et al. 2020). Yet empirical analyses consistently demonstrate that regions worldwide engage in various aspects of migrant integration governance, ranging from immigration

policymaking and regulation of migration flows (Paquet 2020; Xhardez 2024), to facilitating access to citizenship (Filindra and Manatschal 2020), providing sanctuary to undocumented persons (Edwards and Wisthaler 2023) or engaging with other policy areas that fall within the broader theme of migrant integration (Aggarwal et al. 2020; Manatschal et al. 2020). At the same time, migrant integration governance is complicated for all levels of government, as this cross-cutting policy field interacts with education, the labour market, housing and healthcare, among other policy areas. It is even more complicated for the meso level of government, which in most cases shares these policy fields with higher or lower levels of government, seldom having the exclusive power to decide or implement migrant integration policies themselves (Wisthaler and Paquet 2024). Finally, the policy fields of migration and migrant integration are affected by a high degree of politicisation (Van der Brug et al. 2015), marked by highly polarised political discourse as well as the use of concepts that are often ambiguous and contested (Scholten 2020; Schultz et al. 2021). This makes migration and migrant integration a "wicked policy problem" (Rittel and Webber 1973; Head 2022). Wicked problems are "unstructured problems that are marked by uncertainty of policy knowledge (what works?) as well as contestation on policy aims (what do we want to achieve?)" (Scholten 2020, pp. 159–160).

We deliberately chose migrant integration governance as an exemplary case because of these complexities. It provides a basis to argue for subnational policy indicators as a necessary tool for drawing comparisons within and between countries, overcoming the challenges of data availability and the lack of comparative analytical frameworks, as well as the complexities arising from shared competences and the increasingly cross-cutting nature of policy fields.

This article is based on the experience gained from a collaborative research project that resulted in the creation of the REGIN (Regions for Migrants and Refugees Integration) indicators.[1] This original set of policy indicators was created in 2022 to evaluate regional integration governance in 25 regions across 7 European Union (EU) Member States (Pasetti et al. 2022). These challenges of indicator-based comparative policy analysis offer insights into two key areas. They point to broader methodological issues within the field of migration policy studies, such as the conceptualisation and definition of policies, as well as concerns regarding measurement and comparison (Filindra and Goodman 2019; Goodman 2019; Solano and Huddleston 2021). These issues are particularly pressing at the subnational level as they have received less scholarly attention. Second, they provide opportunities to explore how subnational policy outputs can be better studied and analysed in other policy fields, beyond the realm of migrant integration.

The first section of this article reflects on the landscape of subnational policy indicators, mainly from a migration policy literature perspective, while also drawing parallels to indicators designed to assess autonomy and decentralisation at the subnational level across various policy fields. The second section illustrates the process of building indicators and applying them to the subnational level. In this section, building on the work of Bjerre et al. (2015), we illustrate the main methodological and empirical challenges of such a process through three phases, namely: (1) conceptualisation; (2) operationalisation and measurement; and (3) aggregation and scoring. We also discuss potential responses based on the concrete example of the REGIN project. In the

conclusion, we propose avenues for further research in using subnational indicators to better compare governance at the subnational level.

The Research Landscape: Subnational Policy Indicators and Migration Studies

Indicators play a pivotal role in policy analysis at the subnational level. In this section, we explore the intersection of subnational policy indicators and migration studies, with the aim of bridging the gap between these two fields of study.

Three key observations emerge from the literature: (1) there has been significant work to build indicators on the subnational level, but this has mostly been limited to measuring decentralisation and subnational autonomy; (2) indexes are plentiful in migration scholarship, but they are mainly concerned with the national level; and (3) when developing indicators, there is a need to draw on the broader literature from the policy field under consideration – in this case, migration.

Indicators on the Subnational Level are Mostly Limited to Decentralisation and Autonomy

Substantial strides have been made in the development of subnational indicators, with intriguing variations surfacing across different policy fields. These variations reflect the unique challenges encountered by subnational units. For example, in the health sector, Shvetsova et al. (2022) have pioneered a global dataset that encapsulates the stringency of COVID-19 policies at the subnational level. In the welfare sector, Clarke and Lawn (2008) have explored several subnational applications of the Genuine Progress Indicator, providing insights into the challenges and opportunities associated with using this set of indicators beyond the national scale. The field of environmental protection, another policy area rich in contributions, has seen the introduction of the Environment Policy Stringency Index by Gupta and Guha (2024), which has been applied to Indian states, and the Environmental Health Performance Index by Nguyen et al. (2023), used in Vietnamese provinces. In the realm of tourism, Castellani and Sala (2010) have developed the Sustainable Performance Index, a tool for evaluating local development efforts and sustainable tourism policies.

A significant portion of scholarly effort has been directed towards creating indicators that quantify the degree of decentralisation and autonomy of subnational units. These measurements offer valuable insights into the distribution of power, fiscal capacity and degree of autonomy, providing a foundation for understanding the dynamics of governance structures. Harguindéguy et al. (2021) reviewed and compared 25 main decentralisation indexes in the literature to assess their quality, demonstrating the variety of measures developed. To date, scholars have largely relied on comprehensive indexes and datasets, such as the Regional Authority Index (Hooghe et al. 2016), the Local Autonomy Index (Ladner et al. 2016) and the Localisation and Decentralisation Index (Ivanyna and Shah 2012). However, there are ongoing debates regarding the effectiveness of these measurements, due to the diversity of perspectives and the lack of clarity surrounding the concepts involved (Trinn and Schulte 2022, p. 1; see also Schneider 2003; Dardanelli et al. 2019). When conducting comparative policy analysis at the subnational level, relying only on these indexes, the main challenge lies in effectively integrating data on the degree of autonomy or decentralisation while focusing on

a specific public policy field (such as education, social housing or healthcare) (Dougherty and Phillips 2019). This is particularly needed in public policy sectors – including migrant integration – where subnational units have broad jurisdiction and are subject to public debate. Federalism scholars have been particularly keen to develop indicators that focus on dedicated policy fields, including migration. For example, Dardanelli et al. (2019) sought to measure decentralisation within federations across 22 policy areas. One of these was "citizenship and immigration", which conflates citizenship, naturalisation and border control, but excludes integration programmes. In an attempt to compare minority nations (e.g. Catalonia, Quebec and South Tyrol), Mathieu and Guénette's Societal Culture Index (2018, p. 224) builds two indicators based on "the capacity of the minority nation to establish its own *immigration policy*" and "the capacity of the minority nation to empower its own *selection and integration factors with regard to immigration*". This illustrates the variation in definitions across different studies, which can complicate efforts to make meaningful comparisons and evaluate a specific policy area. Policy-specific indicators therefore need to be developed to look beyond the simple autonomy–centralisation dimension.

Indexes of Migration Policy are Mostly Concerned with the National Level

There has been a proliferation of indicator sets and indexes developed by migration scholars to compare migration policies across time and space by measuring and aggregating relevant indicators (Bjerre et al. 2015; Scipioni and Urso 2018; Goodman 2019; Solano and Huddleston 2021). Some examples of these indexes include the Immigration Policies in Comparison (IMPIC) (Helbling et al. 2017), the Multiculturalism Policy Index (Banting and Kymlicka 2013), the Determinants of International Migration Index (DEMIG) (Haas et al. 2014) and the Migrant Integration Policy Index (MIPEX) (Solano and Huddleston 2020). Solano and Huddleston (2021) identified 67 national-level migration indexes, and showed that all the leading indexes in the field pertain to the national level. This was also confirmed by a previous attempt to list and compare leading migration indexes (Scipioni and Urso 2018). However, many migrant integration competences and tasks, in particular, are at least partly under the purview of meso-level (i.e. regional) governments (Vengroff 2013, p. 143). This jurisdictional arrangement leads to significant variations at the subnational level, which are not captured in the national indexes. Although there has been a move to re-scale migration research to lower levels of government in response to the critique of migration studies suffering from "methodological nationalism" (Wimmer and Glick Schiller 2002), this has not yet been fully translated into empirical and systematic analysis. While the "local turn in migration studies" (Zapata-Barrero et al. 2017) has positioned the local level as a salient and independent level for migration and migrant integration policy development, indicators are often limited to single-city initiatives or cross-country associations and networks, such as the Council of Europe's Intercultural Cities Index.

The meso (i.e. regional) level of government, on the other hand, is still largely understudied compared to national and municipal levels. Existing research is dominated by in-depth qualitative studies, which heavily engage with a particular regional context, or by small-*n* comparisons of different regions within the same country. When examining migrant integration at the subnational level, the pivotal consideration seems to be comparing and discerning the inclusivity of policies (Adam and Caponio 2019;

Manatschal et al. 2020; Zuber 2020). The problem is that large-scale meso-level comparisons are still lacking, as are systematic and tailored indicators. So far, Manatschal (Manatschal 2013; Manatschal and Stadelmann-Steffen 2013) has adopted the MIPEX and the Index of Citizenship Rights for Immigrants developed by Koopmans et al. (2012) to measure subnational variation in immigrant integration policies in federal Switzerland. Similarly, Aggarwal et al. (2020) adapted the MIPEX to the Indian federal level. The Immigrant Climate Index (ICI) in the US tries to capture the overall environment for immigrants created by legislation at different levels of government – state, county and city – but instead measures overall hostility or support for migrants. None of these scholars have expanded their indicators to include other countries, nor have they replicated their first data collection and measurement round. Hence, the use of subnational indicators to analyse migration policy is still limited, and cross-country standardised comparisons are still relatively uncommon. In particular, despite the ample empirical evidence of regional involvement in migrant integration governance (Manatschal et al. 2020), we still lack a systematic and comprehensive overview of the relevant policies, governance structures and outcomes.

Indicators should Draw on the Broader Policy Literature

In considering indicators for comparative policy analysis on regional migrant integration governance, it is fruitful to draw lessons from the broader migration studies literature, which has developed rapidly (Levy et al. 2020). This principle applies to all policy fields. When building indicators for a specific field of research, the specificities and complexities of policymaking in that particular field need to be considered. Migration policies are characterised by their multidimensionality, complexity and far-reaching consequences for migrants, their families and their communities (Filindra and Goodman 2019). In addition, policies often occur at different levels, which may not be adequately captured in indicators and measurements. Czaika and de Haas (2013) identify four levels at which migrant policies can be conceptualised: public policy discourses, actual policies on paper, policy implementation and policy outcomes. Scholars have shown that migration policies are characterised by large gaps between these levels (De Haas et al. 2019; Lutz 2019; Infantino and Sredanovic 2022), and the "implementation gap" – a disparity between policies on paper and their actual implementation (Czaika and de Haas 2013, p. 494) – remains particularly opaque. Scholars have shown that the implementation gap in migration policies – as well as in other policy fields – might be attributed to the weighing of potentially competing policy priorities and the discretion of civil servants and other state agents (Hamidi and Paquet 2019; Tomkinson 2020; Miaz and Achermann 2021; Infantino and Sredanovic 2022; Breidahl et al. 2024). The significance of these challenges and gaps must be considered when developing indicators related to migrant integration as it demands the collection of subnational data across various policy stages, which entails its own set of obstacles.

In addition, reflecting the multidimensional character of migrant integration governance requires consideration of multiple phases, dimensions, scales and actors (Zincone and Caponio 2006; Garcés-Mascareñas and Penninx 2016; Panizzon and Riemsdijk 2018). Following the literature in this field, migrant integration governance should be understood as "the multi-phase, multi-site, multi-stage, multi-area and multi-scale system of actors,

relations, resources, policies and practices that effectively regulates international migrations while respecting the principles of protection and sustainable development" (Pasetti 2019). Migrant integration governance entails a multi-level approach that reflects the involvement of a wide set of authorities "away from central government – upwards to the supranational level, downwards to subnational jurisdictions, and sideways to public/private networks" (Hooghe and Marks 2001). By incorporating this broader perspective into the building of indicators, we need to consider the intricate interplay between the different levels of policy, ranging from the policymaking process to the experiences of migrants at the subnational level.

In conclusion, this article aims to overcome and reflect on these shortcomings in the literature by critically discussing the research process for creating and implementing policy indicators at the subnational level. It discusses the main methodological and empirical challenges based on the real-world experience of conducting a comparative research project on measuring the regional integration governance in 25 regions across 7 European countries. In doing so, it discusses the main challenges and limitations that accompany the building of indicators to capture the characteristics of the meso (or regional) level in migrant integration governance.

Measuring Regional Integration Governance with Indicators: Challenges and Responses

The research process for the development of policy indicators is a complex and multi-faceted endeavour, involving numerous phases and tasks. For our study, we rely upon the well-established framework illustrated by Bjerre et al. (2015) for index-building in the field of migration policy. This framework builds upon the foundational work of Munck and Verkuilen (2002) and offers valuable insights tailored to the migration policy field. Its broad scope furthermore renders it applicable across various units of analysis, making it well-suited for constructing indicators at the regional level.

The framework of Bjerre et al. (2015) identifies three main sequential phases for building indicators, namely: (1) conceptualisation; (2) operationalisation and measurement; and (3) aggregation and scoring.[2] Pinpointing these three phases helps to clarify the methodological and empirical challenges that scholars have to deal with when building indicators. For each of these phases, we identify specific challenges. Some of them are inherent in any process of indicator-building; others represent specific challenges that emerge when indicators are applied to the subnational level.

While addressing these challenges, we discuss potential responses based on the concrete example of indicators developed within the REGIN project. These indicators were issued in 2021 to measure and evaluate regional integration governance in 25 regions across 7 EU Member States: Austria, Belgium, Germany, Italy, Portugal, Spain and Sweden. It is important to clarify that the goal of this paper is not to present the results of the REGIN project, but to draw on the experience of its implementation, critically reflecting on various aspects related to building the indicators for regional integration governance.[3]

Conceptualising Regional Governance of Migrant Integration

The conceptualisation phase is the starting point of any research endeavour, as it concerns the definition of the subject matter, its intrinsic nature and its conceptual

boundaries. Since indicators are designed to measure a subject in relation to a benchmark, this phase also involves the definition of the normative criteria underlying the choice of benchmark.

Challenge: Unpacking the Concept of Regional Migrant Integration Governance. As pointed out by Bjerre et al. (2015, p. 567), "[c]onceptualisation is the first and most essential step of index-building, as decisions made at this stage also have an influence on measurement and aggregation". On the one hand, the challenge of this phase is inherent in the conceptualisation process itself: in defining the subject matter precisely and unambiguously. On the other hand, the complexity of this phase depends on the specific subject matter, its degree of abstraction (Sartori 1970) and the richness of the theoretical literature. Concepts related to subnational politics and policy are often especially challenging because a lower level of government does not coincide with a lower level of abstraction. At the same time, the conceptual anchors available in the literature are often limited. Regional governance of migrant integration represents a paradigmatic example of a challenging concept. First, it is tethered to the broad and abstract concept of governance, whose nature is notoriously slippery and contested (Pierre and Peters 2000; Pasetti 2019). Second, it is a typical "wicked policy problem" marked by the absence of a robust conceptual foundation from which to draw (Scholten 2020). The policy fields of migration and migrant integration are affected by a high degree of politicisation, coupled with the use of concepts that are often ambiguous and contested (Scholten 2020; Schultz et al. 2021).

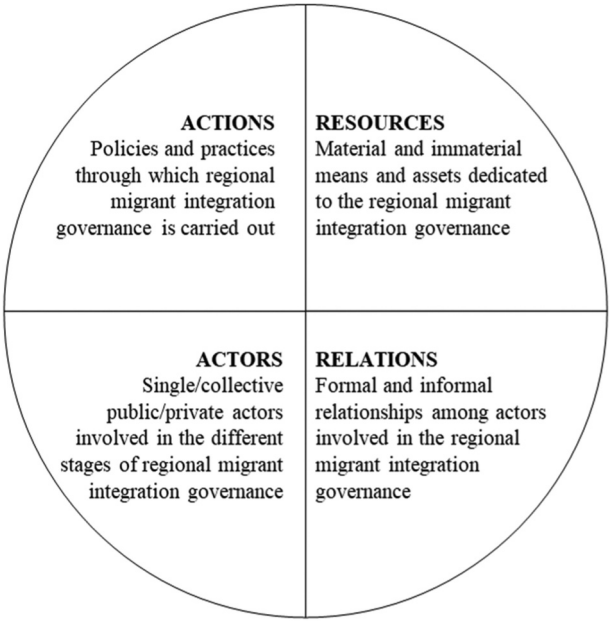
The lack of a solid conceptual foundation leaves scholars with greater freedom to tailor the concept to the specific objectives of the study, and thereby offers potential solutions to the conceptualisation challenge.

Response. For the REGIN project, one of our primary objectives was to bring the analysis of the policy field from "paper" to practice, encompassing an evaluation of how governance is effectively implemented. The other key objective was to comprehensively account for the ample heterogeneity of the empirical reality under investigation.

Accordingly, we sought an "essentialist" working definition, focusing on those analytical dimensions that were individually necessary and jointly sufficient to describe regional integration governance and that, at the same time, allowed us to meet the aims of the study. Therefore, we defined regional integration governance on the basis of four analytical dimensions. Following Pasetti and Lebon-McGregor (2023), the first refers to the elements of governance, which is understood here as a system (see Figure 1), namely:

1. the *actions* through which governance is carried out (e.g. policies, measures, programmes);
2. the *actors and relations* (individual and collective, public and private, internal and external) that bring about such actions; and
3. the *resources* (material and immaterial) employed.

Figure 1. Elements of governance



Source: Authors' own elaboration based on Pasetti and Lebon-McGregor (2023, p. 11).

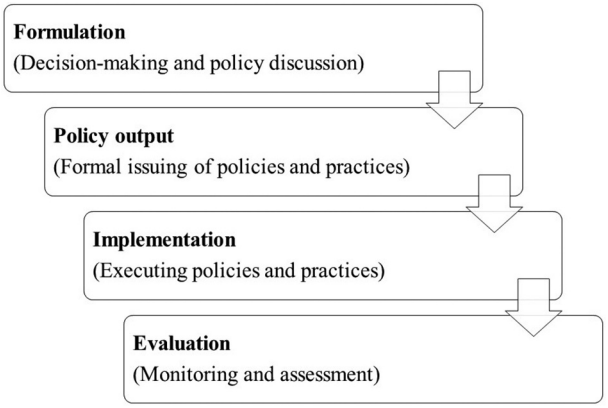
The second dimension refers to the temporality of governance and, drawing on research on the policy cycle (Jann and Wegrich 2007; Knoepfel et al. 2007; Pasetti and Lebon-McGregor 2023), consists of four phases (see Figure 2):

1. *formulation*: the early stage of decision-making;
2. *policy output*: the formal issuing of the decision;
3. *implementation*: the decision is put into practice;
4. *evaluation*: the assessment of the decision implemented.

This third dimension captures the seven policy areas within migrant integration (Vollmer 2014; Solano and Huddleston 2020),[4] consisting of seven policy areas: culture and religion, education, health, housing, language, labour and social security.

These seven policy areas relate to two main target populations in the context of migrant integration (see Figure 3): (1) economic and family migrants and (2) beneficiaries of international protection (BIPs). The first group, also known as third-country nationals (TCNs) in the EU context, are individuals who are not citizens of a EU Member State and may require specific visas or permits to reunite with their family members, reside, work or study in the EU. BIPs are those individuals who have been granted refugee status or other complementary forms of protection, such as subsidiary protection status. As defined in the 1951 Refugee Convention, refugees are individuals who are unable or unwilling to return to their home country due to a well-founded fear of persecution.

Figure 2. Phases of governance



Source: Authors' own elaboration based on Pasetti and Lebon-McGregor (2023, p. 12).

Figure 3. Policy areas and target groups

TARGET GROUPS						
Third- country nationals (TCNs)			Beneficiaries of international protection (BIPs)			
POLICY AREAS						
Culture & Religion	Education	Health	Housing	Language	Labour	Social Security

Source: Authors' own elaboration.

These four analytical dimensions are inherently interconnected. For instance, the temporal phases of the governance process are closely tied to its constituent elements (and vice versa), just as policy areas and target groups are mutually related to governance elements and phases. These mutual relationships among dimensions, however, do not diminish the significance of the conceptualisation for the aims of the study. Instead, it underscores the comprehensive nature of our approach. Taken together, these dimensions enable us to capture the intricate dynamics of regional integration governance. Moreover, each dimension serves as a lens through which to evaluate a specific aspect, thereby contributing to a nuanced understanding of the policy area, tailored to the objectives of the study.

To conclude the conceptualisation stage, we determined the normative perspective through which to evaluate regional integration governance using three criteria (Niessen and Huddleston 2009; European Union 2020; Pasetti and Lebon-McGregor 2023): (1) the capacity to ensure equality of opportunities between migrants and nationals; (2) the capacity to respond to integration in a targeted manner (i.e. through targeted measures);

and (3) the degree of development of the governance model. We followed the experience of MIPEX by looking at the international and EU standards (Niessen and Huddleston 2009; Solano and Huddleston 2020). The normative standards employed in REGIN are rooted in the principles and norms set by the EU Integration Action Plan of Third-Country Nationals (European Union 2020) and by the highest European and international standards aimed at achieving equal rights, responsibilities and opportunities for all residents. It is worth highlighting the specificity and "relativity" of the evaluation. This is an intrinsic methodological limit to indicators as a measurement instrument (Bjerre et al. 2015). This implies that the results of the evaluation depend upon the normative standards chosen. Undoubtedly, there are other conceivable ways to conceptualise regional integration governance, tailored to different objectives. Furthermore, as already mentioned, it is explicitly tailored to the overarching rationale of the encompassing project in which it originates. Nevertheless, our chosen approach provides a tangible and innovative first stage in the development of policy indicators in the absence of a clear and well-established conceptual foundation.

Operationalising and Measuring Regional Integration Governance

The operationalisation and measurement stage is where the concept is empirically translated and measured. This stage involves: the formulation of indicators; the definition of the coding process; the selection of data sources and collection techniques; and the final verification of the measurement's validity and reliability.

When the analysis takes place at the subnational level, this procedure becomes more demanding for two specific reasons: the variation in the unit of analysis and the scarcity of available and/or comparable data. The first challenge, which often affects subnational research in comparative politics (see, for instance, Snyder 2001; Giraudy et al. 2019), is particularly challenging for the selection of indicators. The second issue is more challenging for the measurement process.

Challenge: Variation in the Unit of Analysis. The unit of analysis in the REGIN project is the subnational jurisdiction. The variety in national legal frameworks, and how they define and group subnational constituencies, creates a high degree of diversity between these units of analysis. European regions represent a paradigmatic example of this diversity, varying in terms of the scope and type of competences legally granted to them, as well as in their degree of autonomy vis-à-vis the central government. This variation applies both across countries – due to different constitutional arrangements (e.g. in unitary versus federal states) – and within countries. For instance, due to their distinctive historical and cultural backgrounds, Catalonia, the Basque Country and Galicia have a unique status and a higher degree of autonomy (particularly in areas such as education, healthcare and justice) than other Spanish regions.

Comparing disparate units of analysis is problematic because variation across cases transcends the conceptual boundaries of the subject. This means that, depending on the cases under examination, "regions" may refer to very different empirical entities. It is worth stressing that the relevance of the challenge depends on the aims of the study. In a descriptive and/or exploratory study, where the case selection might be arranged to maximise variation instead of causal leverage, the challenge is somewhat contained.

Conversely, in comparative research aiming to explain regions' actions, variation in the unit of analysis poses crucial issues for the validity and reliability of the results.

Notwithstanding the aim of the study, this issue needs to be considered in the definition of the indicators. Disparate units of analysis may require different measurement tools, precluding the possibility of using a consistent and coherent indicator toolbox across all cases. Solutions to this problem might be sought during the process of indicator selection and formulation.

Response. When constructing REGIN indicators, specific methodological devices were taken into account in response to this challenge. First, the selection of indicators focused on items sufficiently broad and flexible to be applicable across the various units of analysis. This was achieved by selecting and adjusting items from existing indicator sets, at both national and city level, in the field of migrant and refugee integration policy. Our main sources were the MIPEX (Solano and Huddleston 2020), the National Integration Evaluation Mechanism (NIEM) (Pasetti and Conte 2021) and the Intercultural Cities Index (Council of Europe 2019).

This initial set of indicators was then complemented by ad hoc measures developed to capture features of regional integration governance not covered by existing national-level literature. These measures were formulated inductively. For instance, one indicator assesses the degree of autonomy formally accorded to the region across various policy areas; another measures the extent to which regions engage in national integration policies. By integrating these measures, we enrich our analysis and provide a more comprehensive understanding of regional integration governance.

This process resulted in a final set of 61 indicators, balancing comparability, conceptual and empirical clarity, and feasibility considerations. In other words, we selected indicators that could be compared across cases, that were sufficient (in number and kind) to capture the relevant dimensions of analysis, and that were practicable in terms of data gathering.

Challenge: Availability and Collection of Comparable Data. As noted by Sellers (2019), the need for comparable data represents a pervasive obstacle for subnational comparative research. The field of migrant integration is no exception. Despite the relatively favourable conditions in Europe, where data sources and subnational units are better defined due to the existence of official statistical data (e.g. Eurostat) and accountability mechanisms, there are still significant gaps in data availability and transparency at the regional level. We encountered this challenge in our preliminary research to probe the availability and accessibility of data sources. Only 6 of the 25 regions analysed had complete statistics on migration trends and migrant integration outcomes, and had administrative units or bodies dedicated to rigorous data collection (Pasetti et al. 2022). There were also problems with the consistency of data sources, as data-gathering methodologies often differed across regions, and even across departments and/or over time within the same region.

For indicator-based analysis, this issue critically affects the measurement stage: the lack of available/accessible and comparable data sources prevents the consistent measurement of one or more features of the subject matter and, when unevenly distributed across cases, hampers comparison.

Solutions to this challenge inevitably entail data collection tools and techniques that can compensate for the scarcity of official data. When objective or quantitative data is limited, expert surveys (i.e. data gathered through structured questionnaires distributed to experts in a particular field) are particularly useful. Expert surveys have been fruitfully implemented in several fields of political research (Lindstädt et al. 2018), ranging from the effectiveness of regional trade agreements (Gray and Slapin 2012) to the quality of elections (Norris et al. 2013). Its primary limitation is the inherent risk of subjective bias within expert opinions (Knutsen et al. 2023; Little and Meng 2023).

It is therefore imperative that expert surveys are complemented by methodological adjustments that mitigate subjective bias. The experience of the REGIN indicators provides concrete examples in this regard.

Response. REGIN indicators relied on an expert survey conducted using a standardised questionnaire. The involvement of experts, with both on-the-ground experience and academic expertise, was crucial to ensuring the data was robust and reflected the realities of migrant integration governance in diverse regional contexts. The experts played a fundamental role in filling the data gaps by leveraging their unique capacity to access relevant documents in the regional language, assess legal and policy provisions, contact and interview regional policymakers and stakeholders, and identify and retrieve secondary data sources. To validate the surveys, we also considered multiple independent data sources, including normative references (e.g. regional laws and legal provisions, policy documents, official reports, state budgets and spending evidence), academic and grey literature, key informant interviews and other secondary data sources.

Additionally, three specific methodological arrangements were introduced to mitigate the risk of subjective bias. First, for each case, two experts were required to complete the questionnaire and peer-review each other's work. Collected data was then cross- and double-checked by the research coordination team. Throughout the data collection phase, the experts supported the project team to ensure a thorough understanding of the complexities arising from the data. Second, after validation and verification at the regional level, the research coordination team screened the data from a comparative point of view to ensure inter-coder reliability, subsequently validating the data with the experts. Third, the research coordination team conducted a question-by-question consistency check across all regions. In this last phase, the team checked whether the same (or very similar) situations in different regions were equally treated and assessed.

Aggregation and Scoring

The third phase of indicator construction involves aggregation and scoring systems. Aggregation refers to combining indicators into composite synthetic measures. It entails determining the level of aggregation, the aggregation rules and the weighting scheme. The scoring concerns the process of assigning numerical values to indicator responses.

Challenge: Variation in the Units of Analysis. Aggregation and scoring involves navigating decisions made complex by the absence of benchmarks and standards in the literature (Bjerre et al. 2015).[5] Brought to the subnational domain, such decisions become even more challenging because of the variation in the units of analysis. This affects the

operationalisation and measurement phase, as previously described, but also has an impact on the aggregation and scoring systems. Regions with varying levels of jurisdictional authority or expertise add layers of complexity to the aggregation process, for instance. When it comes to the scoring system, the variation in units of analysis make it difficult to distinguish between the absence of a policy in a region *with* jurisdiction and the absence of a policy in a region *without* such competence.

Response. The REGIN indicators provide compelling insights into the challenges of aggregation and scoring systems for subnational indicators.

Regarding aggregation, REGIN indicators pursued the aggregation scheme that best aligned with the conceptualisation phase (see Munck and Verkuilen 2002; Coppedge et al. 2011). Accordingly, the four analytical dimensions of regional integration governance (i.e. governance elements, governance phases, policy areas, target groups) were employed as the axes for building the aggregated scores. Each of these aggregate scores thus provides a synthetic assessment of a specific aspect of regional integration – a particular phase and/or element of governance – as well as of a specific area of integration, or in relation to a concrete target population.

Following the aggregation method employed by most of the existing endeavours (see Beine et al. 2016; Solano and Huddleston 2020), we opted to combine scores within cases by means of a simple average. Given that the cases examined did not follow a standard distribution, and the fact that the mean is more sensitive than the median to extreme values, we opted for the median value to create the regional aggregate scores.

Following the MIPEX methodology (Solano and Huddleston 2020), the REGIN indicators were based on a 0–100 scale. Each indicator was formulated as a multiple-choice question related to a specific element of regional integration governance, where the answer indicates the extent to which the element meets the normative standards employed. A score of 100 means the standard is fully met and 0 means the standard is fully unmet.[6] The scoring system is constructed such that the answers are evenly distributed across this scale; for instance, where there are five possible answers, they correspond to scores of 0, 25, 50, 75 and 100.

Moreover, we adjusted the scoring system to accommodate the formal recognition of competences within regions, while also acknowledging the proactive efforts made by the regions. This adjustment had two aspects: first, an absence or gap in a governance feature was only evaluated and scored for those regions formally holding competence in that area. Second, the presence of a governance feature was evaluated for all regions, irrespective of formal competence recognition. This approach serves a dual purpose: it avoids penalising regions where the absence of a measure may be due to constraints in competence imposed at the national level, while recognising (with scores exceeding 100) regions demonstrating proactive endeavours despite lacking formal competence in that particular area.

Finally, it is worth explaining the three-point scale used throughout the indicator scoring process. For each indicator, experts could choose to rate the presence of a governance element as "systematic" (corresponding to 100), "occasional" (corresponding to 50) or "never" (corresponding to 0). These responses are flexible enough to capture the prevalence of the element across time, space and target group, as the survey question demands. The temporal assessment refers to whether the response provided to

a specific situation has an ad hoc nature. The geographic assessment captures the extent to which such a feature is isolated to a particular locality or whether it occurs systematically throughout the regional territory. Assessing it by target group identifies how well the measure covers the migrant population in the region.

Unresolved Challenges

The REGIN set of indicators also has some unresolved challenges. The first relates to the normative nature of the indicators. The criteria employed to assess governance determine the scope and results of REGIN evaluation. This is a crucial limitation to consider when applying indicators and interpreting the scores collected. The second limitation concerns the descriptive nature of the evaluation. Although scores allow us to focus on potential factors underlying governance gaps (e.g. insufficient resources, the absence of monitoring mechanisms), the lack of in-depth in-case analysis precludes a sound causal assessment. As Pasetti and Lebon-McGregor (2023, p. 44) argue, it is:

> critically important that one does not reduce [integration] governance – an ultimately social and political phenomenon – to the sum of its constituent parts. Reality is far more complex. Just as a warning light on a car can diagnose where an issue is (engine, breaks, lights etc.), and how serious it is (amber, red), it cannot precisely diagnose the exact nature or cause of the problem.

Accordingly, using REGIN indicators to analyse regional integration governance can only be a first step, to be followed and complemented by an in-depth assessment of the challenges and dynamics in each regional context.

Conclusion

Policy indicators can represent a useful analytical tool for understanding subnational variations within and across countries and for illuminating regional and local differences. By taking migrant integration as an exemplary case, this article presents a thorough and critical examination of the research process involved in the creation of a set of indicators tailored to subnational units, namely the Regions for Migrants and Refugees Integration indicators (REGIN). This serves as a foundation for researchers to develop consistent and well-informed indicators that can enhance comparative policy analysis at the subnational level across diverse public policy areas.

By analysing policy outputs and outcomes in a specific policy field, namely migrant integration, the article complements previous research that has predominantly focused on measuring decentralisation and subnational autonomy. Hence, the indicators also go beyond measuring policy output, focusing instead on the governance of the policy issue and the process behind the policy outputs. As such, this article makes at least two key contributions. First, rather than focusing only on the policy outputs (laws and policies), the indicators consider all the phases of the policy cycle, from the formulation and promulgation of policy outputs to their implementation and evaluation (Jann and Wegrich 2007; Knoepfel et al. 2007;

Pasetti and Lebon-McGregor 2023). This is particularly noteworthy given the recognised implementation gap in policy studies, which is even more pronounced when it comes to the use of indicators (Gunn 1978; Czaika and de Haas 2013; Hudson et al. 2019). Second, the indicators include perspectives pertaining to the actors involved, their relationships and the resources mobilised, in addition to the actions undertaken (i.e. policy outputs). This is particularly important when it comes to analysing the meso level, where actors often relate to counterparts at the national and local levels. Incorporating these relationships into the indicators allows for a more thorough analysis of policies at the subnational level. Including all these dimensions, the indicators shed light on the policymaking process, as well as the actors and resources that underlie them. Going beyond the construction of indicators, our article opens avenues for fostering a more productive dialogue with the broader literature on comparative policy analysis at the subnational level.

The article also addresses some of the key methodological challenges that impact comparative policy analysis at the subnational level, providing significant insights. The originality of this article lies in its reflexive and transparent approach, which illustrates challenges and offers concrete solutions for addressing them. For example, a meticulous selection (and adjustment) of indicators, coupled with the implementation of specific methodological approaches to establish the scoring system and metrics, can be pivotal in mitigating the impact of variation in the unit of analysis. Similarly, when appropriately integrated into a research design that mitigates potential subjective bias, expert surveys can be a highly effective and reliable data collection technique, alleviating the challenge of data scarcity that is particularly acute at the subnational level.

By drawing connections between subnational policy research and migration studies, the article underscores how insights from the migration policy field can contribute to the development of indicators for subnational comparative policy analysis in other policy fields. In doing so, it fosters a dialogue between migration studies and the comparative study of subnational policy.

Notes

1. Regions for Migrants and Refugees Integration (REGIN) project: https://reginproject.eu/about/.
2. We have made two minor formal modifications: first, we use the term "operationalisation and measurement" – rather than "measurement" as in the original framework – to more precisely capture the process in the second stage; second, we incorporate "weighting" within the aggregation stage, with "scoring" introduced as a distinct sub-phase in the final stage.
3. The REGIN dataset is available here: https://r.mipex.eu/. The scores measure regional integration governance as at 31 March 2020.
4. Paraphrasing Burstein's (1991, p. 328) definition, the policy sector of integration can be defined as a component of the political system organised around substantive issues concerning the incorporation of migrants into the host society.
5. Although establishing a gold standard in literature remains elusive, literature reviews by Bjerre et al. (2015) and Solano and Huddleston (2021) identify that immigration policy indicators and indexes tend to favour employing the highest level of aggregation, taking an additive approach to aggregation, incorporating implicit or explicit weighting schemes and implementing a scoring system based on a 0–100 scale.
6. Normative standards employed in REGIN are rooted in the principles and norms set by the EU Integration Action Plan of Third-Country Nationals and by the main international standards regarding asylum and

refugee, migrant integration, human rights protection and equality. The complete list of sources of norms and standards employed is provided in Pasetti et al. (2022).

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