

Comparing Nonprofit Sectors Around the World

What Do We Know and How Do We Know It?

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Abstract

The expansion of nonprofit sectors in most countries around the world during the last decades has spurred interest in comparative research. This article documents and analyses the most significant primary sources that can be used to analyze the size and salience of nonprofit sectors in different countries. The focus is on five major research projects: the Johns Hopkins Comparative Nonprofit Sector Project, National Satellite Accounts, CIVICUS Civil Society Index, USAID CSO Sustainability Index, and the NGO Law Monitor. Additionally, the article documents numerous other studies that measure key indicators impacting the sector. These multiple sources often draw seemingly contradictory conclusions. Nonetheless, they can be used to trace the contours of cultural frames—[Neo]Liberal, Corporatist, Social Democratic, Emerging, Developing and Authoritarian—that inform our understanding of how nonprofit sectors operate under diverse political, economic, and social conditions and allow observers to situate the dynamics of the nonprofit sector of any one country in the broader context of other similar polities.

Keywords: *international comparisons; comparative nonprofit research; national nonprofit sectors*

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In the last decades, the activity and influence of nonprofit organizations¹ in almost every country in the world have grown exponentially (Casey, 2016; CIVICUS, 2013b; Colás, 2002; McCarthy, Hodgkinson, & Sumariwalla, 1992; Salamon, 2010; Salamon & Wojciech Sokolowski, 2010; also see the many references in the following sections on the research projects and cultural frames). Nonprofits have become central to policy making, the promotion of civic action, and the delivery of new quasi-public services. In addition to being more numerous, modern nonprofit organizations (perhaps better portrayed as late-modern or even post-modern) are markedly more secular and nonpartisan in their affiliations, more universalist in their service delivery and policy-making aspirations, and more professionalized and commercialized in their operations than earlier iterations rooted in religious charity, political movements, or grassroots collective and voluntary action.

Interest in international comparative studies of nonprofit sectors is growing. Five major research projects seek to compare nonprofit sectors using a range of quantitative and qualitative data to create in-depth narratives that describe the contours and operations of the sector in each of the countries included in the studies. Additionally, other research compares key indicators around the world that affect the nonprofit sector. In this article, the growth of the nonprofit sector and the challenges of comparing sectors between countries are briefly examined and the various international comparative research projects are analyzed. These research projects and indicators are then used to define distinct cultural frames that inform our understanding of the activities of nonprofit organizations around the world and of the distinct national milieus.

The Growth of the Nonprofit Sector

In industrialized democratic countries with a longer history of independent associational life, the nonprofit sector has expanded and become a more integral element in developing and delivering public goods and services. In developing countries and those with authoritarian or single-party regimes, a nascent sector has more openly been pushing against previous constraints and opening up spaces of civic participation, often in concert with authorities that had previously spurned them and may continue to constrain them to a limited sphere of approved activities.

The increase in the activity of nonprofits is in part a spontaneous phenomenon—the bottom-up growth in social action, activism, and civic participation. However, it is also the consequence of deliberate, top-down developmental policies by governments that see nonprofits as instruments for achieving their own objectives, by the for-profit business sector seeking to demonstrate its adherence to corporate social responsibilities, and by the growing nonprofit sector that seeks to perpetuate and expand its activities. No single ideology has dominated the discussions in favor of expanding nonprofit activities. Conservatives consider them a key source of nongovernmental initiatives for counterbalancing state power and introducing market forces into the delivery of public services. Progressives see them as the embodiment of grassroots activism that can help ensure that social services are effectively delivered to those most in need.

¹In this article, the terms *nonprofit organizations* and *nonprofit sector* (usually shortened to *nonprofits*) are used to refer to mission-based nongovernmental organizations that cannot distribute profits to owners or members. The exact definitions and legal structures of such organizations vary considerably between countries. Roughly equivalent terms such as *civil society sector*, *third sector*, *voluntary organizations*, and *associations* appear in the article when they are used in the research projects being discussed.

Paradoxically, the growth of the nonprofit sector has been characterized as the death knell for the welfare state and its salvation (Ullman, 1998). Nonprofits give organizational form to sentiments such as the distrust of governmental institutions and the yearning for arenas for independent action, which neither the political right nor the political left necessarily monopolize. As trust in the capacity of governments to deliver services and to create change wanes, nonprofits are seen to offer an alternative pathway for addressing societal challenges.

The nonprofit sector is immensely heterogeneous, spanning from large, multibillion dollar, mainstream, professionalized institutions that function similarly to for-profit firms and have close relations to governments and corporations, to small, hardscrabble all-volunteer organizations providing shoe-string services or pushing for systemic change from the fringe. Definitive global figures on the growth of the nonprofit sector are not available, because there is no single international repository of comprehensive statistics, but many studies at national levels document the increases in numbers and salience within countries. Figure 1 shows the growth of registered nonprofits in the United States.

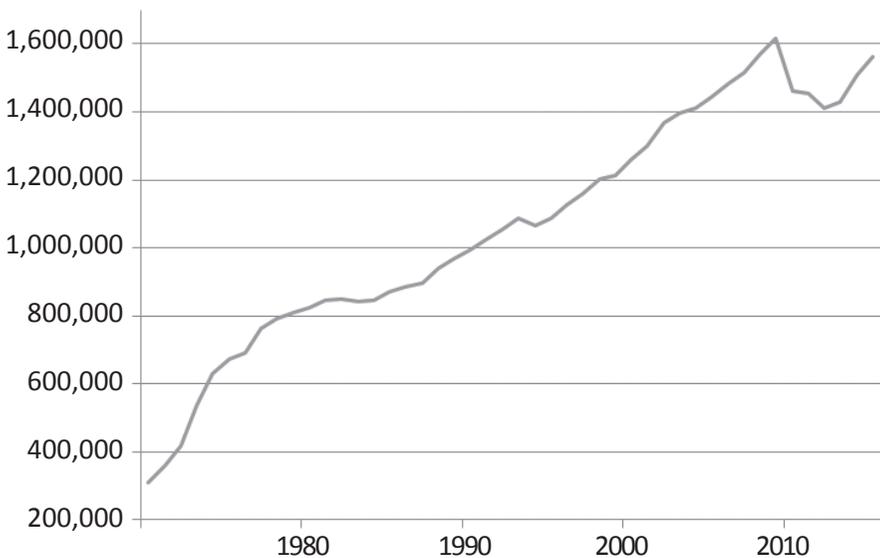


Figure 1. Registered nonprofits in the United States. From “Registered Nonprofit Organizations,” by National Center for Charitable Statistics, 2014 (http://nccsdataweb.urban.org/tablewiz/tw_bmf.php). Between 2010 and 2013, some 200,000 organizations (12% of the total) lost nonprofit status because of a change in reporting regulations. Most deregistered organizations either were no longer active or were the local branches of national nonprofits.

As Figure 1 demonstrates, the growth may not be constant—in any country there are spurts and contractions that reflect the short-term effects of political transitions, economic cycles, and changing legislation or regulations—but the upward trend is the norm around the world. In most countries, accurate figures on registered nonprofits are not as readily as in the United States, but summaries of typical growth narratives from various countries and regions are given in Table 1.

Table 1*Growth Narratives*

Country/region	Narrative
India	The number of [nonprofits] formed after 1990 has increased manifold, and the pattern of increase over the years is almost the same in all the States. There were only 144,000 societies registered till the year 1970, followed by 179,000 registrations in the period 1971 to 1980, 552,000 registrations in the period 1981 to 1990, 1,122,000 registrations in the period 1991 to 2000, and as many as 1,135,000 societies registered after 2000 (Government of India, 2009).
South Korea	Since the June 1987 democracy uprising, activity in interest group politics has surged and [nonprofits] have become salient political actors that undertake public functions through private initiatives (Kim, 2003).
Sub-Saharan Africa	In the post-independence period, advocacy, development, and human rights organizations emerged across the continent. In addition, [nonprofits] increasingly played a critical role as service providers. Indeed, some commentators described their growth as an “explosion of associational life in Africa” (International Center for Not-for-Profit Law, 2011).
Catalonia, Spain	The [nonprofit sector] has witnessed a long growth period over the last decades which has resulted in a considerable increase in both their number and size, as well as in their social impact (Vidal, 2011).
Saudi Arabia	Saudi Arabian society has seen an unprecedented increase in demand for civic rights. As a result, many collaborative civil society initiatives have been undertaken to establish independent nonprofits working on public affairs issues. In response to these collaborative initiatives, the Saudi Government enacted legislation that addresses the issue of registering and supervising these organizations (International Center for Not-for-Profit Law, 2011).

Despite a general consensus that the rise in prominence of nonprofits has been positive, they have not been universally welcomed or embraced, and many instances of considerable pushback against the growth of the sector have occurred. In the report on

Sub-Saharan Africa nonprofits, the International Center for Not-for-Profit Law (2011) also noted that some governments on that continent have developed enabling laws and regulations to support such organizations, whereas others have enacted laws to severely restrict their operations. Some governments and elites fear the rise of the nonprofits because the nonprofits constitute a potential threat to their hegemony, and others promote a state-centric model of policy making and service delivery that restricts the operational space afforded to nonprofits.

Challenges of Comparing National Nonprofit Sectors

The origins, functions, and modes of operation of the nonprofit sector in each country reflect its unique social, economic, and political history (Casey, 2016; DiMaggio & Anheier, 1990; James, 1989; Kramer, 1981; McCarthy et al., 1992; Pryor, 2012; Salamon & Anheier, 1997; Salamon & Wojciech Sokolowski, 2010). Historical path dependency is a well-established concept in social sciences, and in nonprofit studies Salamon and Anheier (1998) speak of “social origins” and “nonprofit regimes” and Anheier and Kendall (2001) identify “national scripts.” Even though in the last decades there has been an increasingly common global discourse about the growth of the nonprofit sector and its increasing role in service delivery, policy making, and economic life, fundamental historic differences between the sectors in different countries persist. Any contemporary growth is grafted onto the different national rootstocks of the past evolution of the sector.

Any attempt at international comparisons of political and social structures faces considerable limitations, including substantial differences between countries in the definitions and use of key terms and concepts, and the multiple obstacles to securing comparable data (Hague & Harrop, 2010). Research on nonprofits offers multiple examples of the challenges of documenting and comparing sectors and of interpreting long cultural histories of associative life through the lens of contemporary conceptual frameworks. Key concepts such as civil society and social capital inform our understanding of the nonprofit sector around the world, but attempts to apply them in different cultural contexts are often fraught. The Chinese *guanxi* and the Melanesian *wantok* describe traditional relationship networks that help individuals and groups articulate their interests and are often equated to the Western concept of social capital. But they are also seen as corrupting influences that potentially generate cronyism and nepotism.

Deciding which organizations to include in counts of the nonprofit sector is in itself a conundrum. Japan is often characterized as having a comparatively small nonprofit sector, a ranking based on the relatively low number of entities incorporated under a landmark 1998 law on nonprofit organizations and on few of the these organizations being eligible for tax deductible donations. However, Japan has a long history of local communal life with neighbors actively participating in the maintenance of public spaces and ensuring the well-being of neighbors. The formal structures of this neighborhood life are associations known as *jichikai* (also rendered in English as *chihai-kei* and usually translated as neighborhood or community associations), which are present in almost every locality. Neighbors pay dues and the association provides sanitation, security, recreational and welfare activities, as well as institutional links to the local government. Participation is voluntary, but there is strong cultural pressure to belong, and nonparticipation would leave one branded as an outsider, particularly in

rural areas and older urban neighborhoods. During the Second World War, the *jichikai* were used for home-front mobilization and after the war were initially disbanded by the occupying forces as antidemocratic remnants of the old regime. But they were soon reestablished and are now considered a key element of Japanese social cohesion (Applbaum, 1996). Nonetheless, they are often overlooked in research on nonprofits in Japan, with many observers regarding the *jichikai* more as part of the government apparatus because of their institutional links. They are generally regarded as conceptually separate from modern independent nonprofits in Japan, even though analogous organizations with the same goals and activities would be considered the core of the community-based nonprofit sector in many other countries.

The focus of this article is on comparing contemporary national nonprofit sectors, but path dependency and social origins approaches to the study of nonprofits are based on understanding how the history of each polity has conditioned current dynamics. In industrialized countries, guilds and fraternal societies that once dominated the associative sector have become a shadow of their former selves; mutual financial institutions, such as local savings and loans societies, have amalgamated and de-mutualized; and trade unions, mainstream religions, and political parties have seen membership plummet. In developing countries, traditional associative structures based on ethnicities, religions, kinship, localities, or trades are being swept away as modernization, development, and globalization (all highly contested concepts) take hold. Political transitions transform former clandestine opposition networks into new legal organizations or simply foster new spaces of independent, non-state action.

In the cultural frames described later, historical change is a constant theme in the analysis of the forces that have created the contemporary sectors. National narratives from around the world describe new or modern sectors that reflect the recent changes. Although collective voluntary action has a long history within each national context, the contemporary nonprofit sector is clearly distinct from earlier structures that were rooted in faith-based organizations, political parties, labor movements, or other traditional bonds. In the narratives of the contemporary dynamics of a range of countries, the nonprofit sector is cited as larger, more influential, and more integrated into national policy making and service delivery than at any time in recent history.

Comparative Research Projects

Researchers and international organizations are addressing the methodological challenges, and considerable work has been done to standardize definitions and data collection methodologies internationally. Five key research projects have made a significant contribution to our understanding of the nonprofit sector worldwide. However, each covers only a limited number of countries, so all have significant gaps. No single study covers China, India, and the United States, the three most populous countries. Collectively, the studies cover only 124 of the some 200 recognized states and territories in the world (although they do cover the majority of the world population, and missing countries, such as Haiti and Bangladesh, are extensively documented elsewhere). Table 2 indicates the countries covered by each of the research projects.

Table 2*Countries and Territories Included in the Research Projects*

Research project	Countries and territories
Johns Hopkins University Comparative Nonprofit Sector Project	(45 countries): Argentina, Australia, Austria, Belgium, Brazil, Canada, Chile, Colombia, Czech Republic, Denmark, Egypt, Finland, France, Germany, Ghana, Hungary, India, Ireland, Israel, Italy, Japan, Kenya, Lebanon, Mexico, Morocco, Netherlands, New Zealand, Norway, Pakistan, Peru, Philippines, Poland, Portugal, Romania, Slovakia, South Africa, South Korea, Spain, Sweden, Switzerland, Tanzania, Thailand, Uganda, U.K., U.S.A.
National Satellite Accounts (Johns Hopkins University/ UN/National Statistics Agencies)	(16 countries): Australia, Belgium, Brazil, Canada, Czech Republic, France, Israel, Japan, Kyrgyzstan, Mexico, New Zealand, Norway, Philippines, Portugal, Thailand, U.S.A.
CIVICUS Civil Society Index	(72 countries and territories): Albania, Argentina, Armenia, Azerbaijan, Belarus, Bolivia, Bulgaria, Canada, Chile, China, Croatia, Cyprus (South), Czech Republic, Ecuador, Egypt, Estonia, Fiji, Georgia, Germany, Ghana, Greece, Guatemala, Guinea, Honduras, Hong Kong, India (state of Orissa only), Indonesia, Italy, Jamaica, Japan, Jordan, Kazakhstan, Kosovo, Lebanon, Liberia, Macedonia, Mexico, Mongolia, Montenegro, Morocco, Mozambique, Nepal, Netherlands, New Zealand, Nicaragua, Nigeria, Northern Ireland, Palestinian Authority*, Pakistan, Philippines, Poland, Romania, Rwanda, Russia, Senegal, Scotland, Serbia, Sierra Leone, Slovenia, South Africa, South Korea, Taiwan, Tanzania, Togo, Turkey, Uganda, Ukraine, Uruguay, Vietnam, Venezuela, Wales, Zambia.
U.S. Agency for International Development (USAID) CSO Sustainability Index	Central and Eastern Europe and Eurasia⁴ (29 countries): Albania, Armenia, Azerbaijan, Bosnia, Bulgaria, Belarus, Czech Republic, Estonia, Georgia, Croatia, Hungary, Kyrgyzstan, Kosovo, Kazakhstan, Lithuania, Latvia, Moldova, Montenegro, Macedonia, Poland, Romania, Serbia, Russia, Slovenia, Slovakia, Tajikistan, Turkmenistan, Ukraine, Uzbekistan. Sub-Saharan Africa⁵ (25 countries): Angola, Botswana, Burundi, Democratic Republic of Congo, Ethiopia, Gabon, Gambia, Ghana, Guinea, Kenya, Liberia, Malawi, Mali, Mozambique, Nigeria, Rwanda, Senegal, Sierra Leone, South Africa, South Sudan, Tanzania, Uganda, Zambia, Zimbabwe.

Table 2 (cont.)

Research project	Countries and territories
International Center for Not-for-Profit Law, <i>NGO Law Monitor</i>	(41 countries): Afghanistan, Algeria, Azerbaijan, Bangladesh, Belarus, Cambodia, China, Colombia, Ecuador, Egypt, El Salvador, Ethiopia, Honduras, Indonesia, Iraq, Jordan, Kenya, Lebanon, Malaysia, Mexico, Morocco, Nepal, Nicaragua, Nigeria, Pakistan, Palestine, Panama, Peru, Russia, Rwanda, Saudi Arabia, Sierra Leone, South Africa, Tajikistan, Turkey, Turkmenistan, Uganda, Uzbekistan, Venezuela, Yemen, Zimbabwe.

Note. Johns Hopkins Nonprofit Comparative Research Project data available from <http://ccss.jhu.edu/research-projects/comparative-nonprofit-sector/about-cnp>. Various publications are available for each country, with dates starting in 1996. National Satellite Accounts data available from <http://ccss.jhu.edu/research-projects/un-nonprofit-handbook/un-handbook-publications>. CIVICUS Civil Society Index data available from <http://www.civicus.org/csi/index.php>. The Palestinian Authority report does not appear on CIVICUS site, but is available at <http://www.masader.ps/p/en/node/7638>. U.S. Agency for International Development (USAID) CSO Sustainability Index data available from <http://www.usaid.gov/europe-eurasia-civil-society> and <http://www.usaid.gov/africa-civil-society>. International Center for Not-for-Profit Law [ICNL], *NGO Law Monitor* data available from <http://www.icnl.org/research/monitor/index.html>. This list only includes Monitor country reports. Reports on regional intergovernmental entities are also published by ICNL, and numerous documents from many other countries can be accessed through the site.

The first project listed in Table 2, The Johns Hopkins University Comparative Nonprofit Sector Project, which began in 1990, was the first systematic international effort to analyze the size, scope, structure, financing, and roles of the nonprofit sector around the world. The project sought to increase practical and theoretical knowledge about the nonprofit sectors and to help provide a basis for informed public policy and private philanthropy. The objective of the project was to understand the factors that encouraged or hindered the growth of the sector in each country and to evaluate the effects of its contributions. Almost every contemporary study and profile of the nonprofit sector references this seminal work.

The field research was done primarily in 1995–1998, and the results were published in various working papers and books (Salamon, Wojciech Sokolowski, & List, 2003). Given the differences in definitions and legal structures of organizations and the dearth of reliable statistics, the project used mixed methodology to document the scope of the sector in the countries researched. It combined official economic and population statistics with a variety of estimating techniques as well as with data assembled by umbrella groups and limited original survey work. There have been newer project publications (Salamon & Wojciech Sokolowski, 2010), but they are based primarily on forward projections from the initial data.

The project has documented the growth of nonprofit sectors around the world and fostered it. A goal of the project had always been to improve awareness and build local capacity (Salamon & Wojciech Sokolowski, 2010). One of the founding principal researchers of the study is credited with coining the phrase “global associational revolution” (Salamon, 1994), and the globetrotting activities of Lester Salamon and other early project researchers, such as Helmut Anheier, along with their extensive network of local associates, have generated considerable academic research and public policy interest in the sector. Disciples have set up research and advocacy organizations in a number of countries as platforms for policy discussions and for the drafting of legislation favorable to the sector.

The project publications contain numerous tables and graphs that compare countries on key metrics. The mix of revenues from earned income fees, government subsidies, and philanthropy is illustrated in Figure 2.

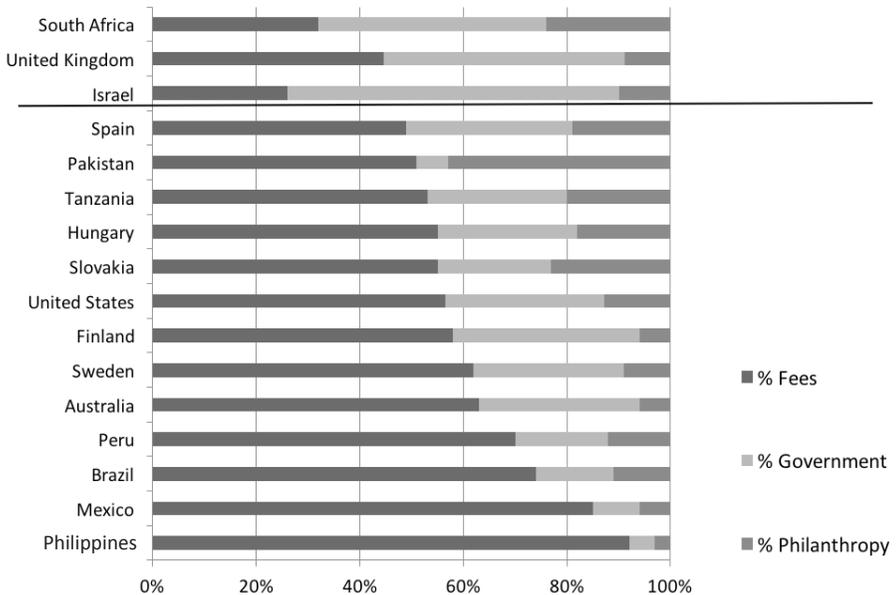


Figure 2. Comparative Nonprofit Sector Project: Sources of income. Data from *Global Civil Society: An Overview*, by Salamon, Wojciech Sokolowski, and List, 2003, Baltimore, MD: Johns Hopkins University, Center for Civil Society Studies.

These and other key indicators were used in the 2003 publication (Salamon et al., 2003) to define patterns or clusters divided into two main groupings: developed, and developing and transitional countries. The developed countries were broken down according to their welfare state regimes into the subclusters of Anglo-Saxon, Nordic welfare, European welfare partnerships, and Asian industrialized, and the developing and transitional countries were broken down by regions into the subclusters of Latin America, Africa, and Central and Eastern Europe. In the 2010 edition of *Civil Society*, updated definitions of the patterns were based on the combination of the size of the nonprofit workforce, the share of the nonprofit workforce that are volunteers, the level of government support, the level of philanthropic support, and the share of organizations that focus more on expressive functions than on service functions. The five patterns were identified as Liberal, Welfare Partnership, Social Democratic, Statist, and Traditional (Salamon & Wojciech Sokolowski, 2010).

Despite the significant contribution of the Johns Hopkins project in creating comparative frameworks, there continue to be significant gaps in knowledge about the nonprofit sector. To try to create a more accurately comparative database, Salamon and his collaborators have sought to institutionalize the measurement of the nonprofit sector by working with the United Nations (UN) Statistics Division and with the statistics agencies of individual countries to create international standards for calculating the contribution of nonprofits to national economies. The focus has been on fostering the second project listed in Table 2, the creation of Nonprofit Satellite Accounts as part of the System of National Accounts, the official international system of collecting and reporting economic statistics, which has until now consigned nonprofits to “statistical oblivion” (Salamon, 2002). The collaboration between the Johns Hopkins project and the UN Statistics Division has resulted in the publication of a *Handbook on Non-Profit Institutions in the System of National Accounts* (UN, 2003) and subsequent efforts to implement satellite accounts at national levels around the world. By 2011, some 16 countries had produced satellite accounts and some 30 more had made formal commitments to implement them in the near future. The first 16 countries to complete satellite accounts show the following results for the contribution of nonprofit institutions to GDP, including the contributions of volunteers (see Table 3).

Table 3

National Satellite Accounts: Contribution of Nonprofit to GDP

Country	Nonprofit contribution to GDP %	Research year
Canada	8.1	2008
Israel	7.1	2007
Mozambique	6.7	2003
U.S.	6.6	2009
Belgium	5.8	2008
New Zealand	5.3	2004
Japan	5.2	2004
Australia	4.9	2007

Table 3 (cont.)

Country	Nonprofit contribution to GDP		Research year
		%	
France		4.7	2002
Norway		4.6	2009
Brazil		3.4	2002
Kyrgyzstan		2.3	2008
Mexico		2.2	2008
Portugal		2.0	2006
Czech Republic		1.6	2009
Thailand		0.8	2008

Note. Adapted from “Putting the Civil Society Sector on the Economic Map of the World,” by L. M. Salamon, 2010, *Annals of Public and Cooperative Economics*, 81, 167–210, and *The State of Global Civil Society and Volunteering: Latest Findings From the Implementation of the UN Nonprofit Handbook (Comparative Nonprofit Sector Working Paper #49)*, by L. M. Salamon, S. W. Sokolowski, M. Haddock, and H. S. Tice, 2013 (<http://ccss.jhu.edu/publications-findings/?did=393>).

The third project in Table 2, The Civil Society Index (CSI), is one of the signature projects of the CIVICUS World Alliance for Citizen Participation and works to strengthen citizen action and civil society throughout the world. The two phases of CSI, 2003–2006 and 2008–2010, covered 71 countries. It focused on four dimensions: the *structure* of civil society, the external *environment* in which civil society exists and functions, the *values* practiced and promoted in the civil society arena, and the *impact* of activities pursued by civil society actors. These four dimensions are measured using a core set of 74 universal quantitative and qualitative indicators, and country teams are encouraged to adapt and add their own indicators to ensure contextual validity. Each dimension is assigned a score of 1–3, and the results for a country are represented graphically as a Civil Society Diamond. Figure 3 shows the diamond for Sierra Leone, a country with an increasingly vibrant civil society that plays a key role in bringing peace and stability, but one that is still marked by a fragile enabling environment, poor resources, and weak organizations lacking internal democracy, accountability, and transparency (CIVICUS, 2009).

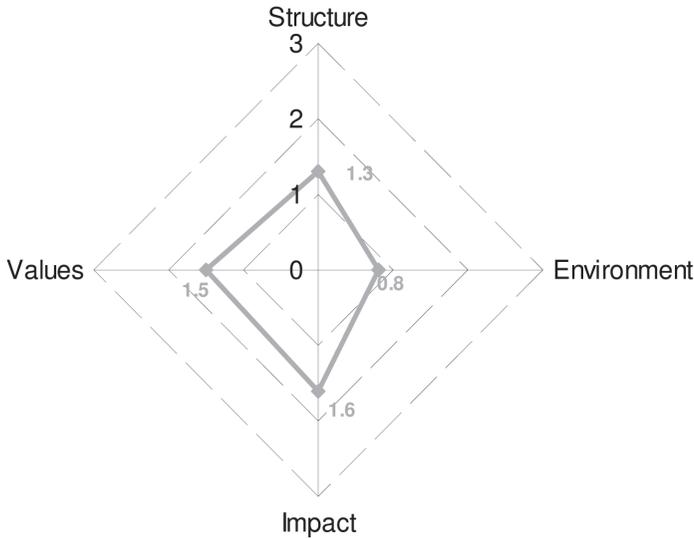


Figure 3. Civil Society Index: Civil society diamond for Sierra Leone. From *CIVICUS Civil Society Index Report for the Republic of Sierra Leone: A Critical Time for Civil Society in Sierra Leone—Executive Summary*, by CIVICUS, 2009, para. 1.

CIVICUS continues to explore methodologies for measuring and comparing civil society in countries around the world. In 2012, CIVICUS released its first annual global *State of Civil Society*, which combined a review of the trends affecting national civil societies around the world with the national profiles that resulted from the second phase of its survey. The *State of Civil Society 2013* examined the enabling environments for civil society and focused on emblematic case studies from around the world (CIVICUS, 2013b). In 2013, CIVICUS launched a new Enabling Environment Index (CIVICUS, 2013a), which seeks to document the socioeconomic, sociocultural, and governance environments at national levels that enable or hinder the development and operations of civil society. The justification for creating a new index to complement the existing Civil Society Index was the need to cover the broader definition of civil society as a space or sphere and not just as organizations. The Enabling Environment Index was calculated using 71 indicators gleaned from available sources such as the UN Human Development Index, the World Values Survey, and the World Bank Development Indicators.

The fourth project in Table 2 is a product of the U.S. Agency for International Development (USAID), the development agency of the U.S. government. As part of its Democracy and Governance program, USAID has been publishing annual reports since 1997 on the state of the nonprofit sector in 29 countries in Central and Eastern Europe and Eurasia and in 2010 began publishing reports on 19 countries in Sub-Saharan Africa. The reports, originally titled *The NGO Sustainability Index* but later changed to *The CSO Sustainability Index*, analyze and assign scores to seven interrelated dimensions: legal environment, organizational capacity, financial viability,

advocacy, service provision, infrastructure, and public image. These are then averaged to produce an overall sustainability score. Scores are in the range of 1–7, with a lower score signifying greater sustainability. A panel of practitioners and experts in each country assesses the sector’s performance and a Washington-based editorial committee of technical and regional experts reviews the local panels’ findings. Based on their scores, countries are classified as *sustainability enhanced*, *sustainability evolving*, or *sustainability impeded*. Figure 4 shows the scores for the Central and Eastern European and Eurasian countries.

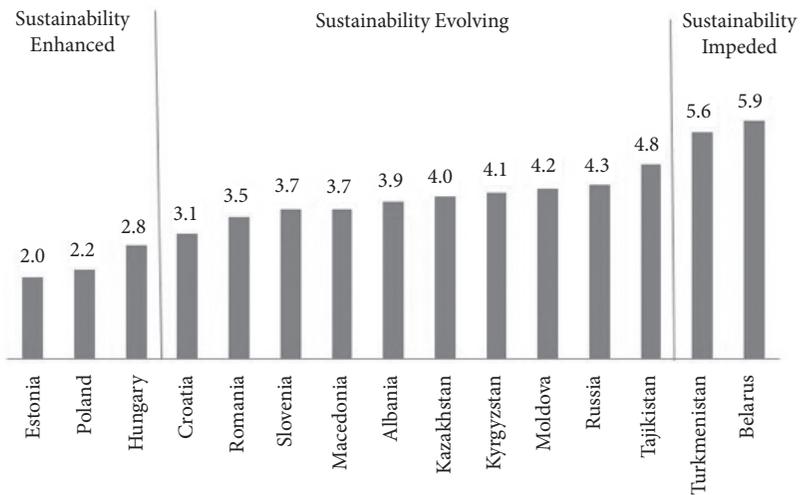


Figure 4. USAID: Sustainability Index scores. Adapted from *2010 NGO Sustainability Index for Central and Eastern Europe and Eurasia* (14th ed.), by U.S. Agency for International Development, 2011 (http://www.usaid.gov/locations/europe_eurasia/dem_gov/ngoindex/).

The scores are accompanied by narrative reports that outline the recent developments affecting the nonprofit sectors in the different countries.

The fifth project in Table 2 is the work of The International Center for Not-for-Profit Law (ICNL), an international nonprofit organization that promotes an enabling legal environment for freedom of association and public participation around the world by brokering the flow of knowledge about legislation and regulations and by providing technical assistance to governments and nonprofit organizations. The ICNL online library contains more than 2,900 resources from 165 countries and territories in 42 languages, and ICNL publishes the *NGO Law Monitor*, a compendium and analysis of laws and regulations in many countries and regions, as well as an academic journal, the *International Journal for Not-for-Profit Law*, and numerous thematic reports and analytical articles. The resources are somewhat patchy (the online library holdings for any particular country may be as sparse as one single form in the local language), but the 41 country-focused compendiums in the *NGO Law Monitor* are continually updated.

ICNL also collaborates with other organizations to develop and evaluate tools for assessing the enabling environments for civil society. A recent issue of its journal compared eight assessment tools, and ICNL and CIVICUS have jointly developed a guide for researchers and advocates (International Center for Not-for-Profit Law, 2014).

Comparing the Studies

The five research projects detailed in the preceding section are invaluable resources for understanding the domestic nonprofit sectors of different countries. However, they also highlight the reality that there continues to be no single authoritative source that provides comprehensive current data on the nonprofit sector in all countries and that data collection varies greatly between countries. The research projects generally rely on local partners, and although each project has a standard common methodology, these partners put their own spin to the research. This allows projects to adjust for cultural differences, but also exposes the results to possible bias errors.

An analysis of how a single indicator, Charitable Giving, is evaluated and ranked in CIVICUS Civil Society Index reports from Germany and Guinea illustrates the challenges. In the Germany report, the Maecenata Institute of Philanthropy and Civil Society at Humboldt University in Berlin gives Germany a mid-level grade (2 out of a possible 3) based on an extensive analysis of national taxation statistics on regular giving to nonprofits. In the Guinea report, the National Council for Guinean Civil Society Organizations gives Guinea the highest grade (3 out of a possible 3) based on a small-scale community survey that simply asked respondents if they give to charity (CIVICUS, 2012).

No countries are the subject of all five research projects outlined, and only four countries (Czech Republic, Mexico, South Africa, and Uganda) are included in at least four projects. For countries included in two or more research projects, there can be apparent inconsistencies and contradictions in the data and narratives in the different reports. In Table 3, Mozambique, a country generally characterized as a typical developing country with a weak nonprofit sector, appears near the top of the list in terms of the nonprofit sector contribution to GDP, and Norway, which is usually characterized as having a robust nonprofit sector, is toward the bottom. Such discrepancies underline the need to understand the local context of each country. The large contribution of the nonprofit sector in Mozambique may be due to the outsized influence of large foreign donors and international organizations in a developing country as well as the tendency of elites in developing countries to support the private provision of key services, such as health and education, through nonprofit organizations separate from inadequate government systems. The small relative size of the nonprofit contribution in Norway may be due to the outsized revenue that country derives from North Sea oil and gas.

The differences between results in research reports are largely due to differences in methodologies and access to information, but also to the different orientations and agendas of the participants. The National Satellite Accounts and the ICNL may be the most impartial, but they also focus only on the economic and legal dimensions of the sectors, respectively, and thus may not capture many of the wider social and political implications. The other projects have more specific normative agendas: The Johns Hopkins project clearly stated from the outset that a goal was to improve awareness, CIVICUS is a nonprofit created specifically to strengthen citizen action and

civil society, and USAID is a U.S. government agency that through its Democracy and Governance program seeks to promote sustainable democracy through diplomatic efforts and the support of government institutions and civil society. It is to be expected that local partners would have different dialogues with a university research center, a nonprofit advocacy organization, and an agency of the U.S. government.

Although the coverage of the sector around the world is substantial, the most significant gap in the research is the small representation of Arab countries. Prior to the current political upheavals in the region, the preponderance of authoritarian and single-party regimes in the second half of the 20th century kept their formerly more independent civil societies under a tight leash (R. Brown & Pierce, 2013) and restricted the work of internal and external researchers. Another factor has been the historic institutionalization of charity and social services through Islamic organizations, based on the religious precepts of *zakat*, *sadaqah*, and *waqf*. Research on the operations and finances of faith-based institutions from all religions has been particularly challenging. In a few countries, the social service dimensions of their work is delivered through separately incorporated nonprofit organizations and thus are subject to the same oversight and transparency requirements as other nonprofits. In most countries, however, social services are generally provided directly by the religious institutions and thus continue to be outside the full accounting of the taxation system or other regulatory oversight. This latter situation is the reality in most Arab countries. In 2011, *Forbes Middle East* published its first list of The Most Transparent Charities in the Arab World (Forbes Middle East, 2011). In a region of some 370 million people, *Forbes* was able to rank only 54 of the 337 charities surveyed because the remainder could not supply sufficiently independent audited financial statements. Of the 22 Arab countries, five were absent from the list because their ministries refused to provide lists of charities and four were excluded because of political turmoil. In the second list covering 2012, only 61 charities from 2,050 surveyed were deemed sufficiently transparent to be included (Forbes Middle East, 2013).

Other Possible Indicators of Nonprofit Activities

In addition to the research projects outlined, a number of other international comparative indexes are relevant to the nonprofits, either because they focus on issues that directly affect the sector or because they document key determinants of the enabling environment.

The most directly significant of these indexes are related to philanthropy and volunteering (i.e., the giving of money and time to nonprofits). In 2010, the U.K. Charities Aid Foundation began publishing a World Giving Index based on data from the Civic Engagement Index of Gallup WorldView poll, an ongoing survey project carried out in 153 countries covering 95% of the adult population of the world (Charities Aid Foundation, 2010, 2011, 2012). Included in the Gallup survey are questions about whether respondents have in the previous month donated money or volunteered time to an organization or helped a stranger. The Charities Aid Foundation extracts this data to generate the index. The index has significant measurement challenges, including how to weigh the effects of formal, organized giving against informal solidarity networks. Some countries that in other research reports are characterized as having small and weak nonprofit sectors appear near the top of the World Giving Index ranking. For

example, Sierra Leone and Guinea are ranked in the top 20 of giving countries because large numbers of respondents indicate that they help strangers.

The Charities Aid Foundation has also produced other comparative reports, most notably the earlier *International Comparisons of Charitable Giving* (Charities Aid Foundation, 2006), which compares charitable giving as a proportion of the GDP in 12 countries. Of the 12 countries, the United States had the highest rate of giving with charitable contributions accounting for 1.67% of GDP, whereas it was only 0.17% in France.

The Center for Global Prosperity of the Hudson Institute in the United States has also begun a series of reports on giving around the world. The *2013 Index of Global Philanthropy and Remittances* (Hudson Institute, 2013a) focuses on financial transfers from developed to developing countries, comparing philanthropy and migrant remittances to official development aid and private capital transfers. Philanthropic transfers represent .25% of U.S. GDP but only .085% of Norway's; in contrast, Norway dedicates more than 1% of its GDP to official aid, whereas the U.S. dedicates only 0.2%. The Center for Global Prosperity has also published *Philanthropic Freedom: A Pilot Study* (Hudson Institute, 2013b), which analyzes the ease of creating nonprofit organizations and the institutional incentives for philanthropy in 13 countries. Countries such as Holland and the United States have few barriers to the creation of nonprofits and significant incentives for giving, whereas China and Russia have high barriers and few incentives.

In 2013, a U.K. consultancy launched the Big Mac Philanthropy Index, which measures relative generosity of charitable donations in 38 countries using the Big Mac Index developed by *The Economist* magazine as the unit of comparison (Management Centre, 2013). The Big Mac Philanthropy Index corrects for differences in national costs of living by pegging the value of the donations to the local cost of a Big Mac hamburger, but it is still subject to error because it is based on the donations to only a small group of large international charities that operate in all the countries, even though the organizations may be structurally and culturally different. However, it does provide some "food for thought" (pun intended) because it seemingly contradicts many of the findings of other research. The index ranks the citizens of Singapore and Malaysia as among the most generous, even though those countries are generally considered to have small nonprofit sectors, whereas countries such as Sweden and Netherlands, two countries with large nonprofit sectors, are among the least generous.

From its very beginnings, the Johns Hopkins Comparative Nonprofit Sector Project, outlined earlier, sought to document the contribution of volunteers to the nonprofit sector and the economy. The successor entity to the original project, the Johns Hopkins Center for Civil Society Studies, continues to work with the UN and the International Labour Organization to improve data gathering on the contribution of volunteering to the economy through the *Manual on the Measurement of Volunteer Work* and the Global Volunteer Measurement Project (Global Volunteer Measurement Project, 2011). In a related project, in 2011 the UN Volunteers office launched *State of the World's Volunteerism Report*, which sought to document the diverse forms of domestic and international volunteering. The report acknowledges the diverse form of indigenous collective action and notes that uncompensated activities to assist other

individuals and strengthen communities are evident in all societies, even though the term *volunteering* is not necessarily used to describe them.

Numerous other research studies and surveys document political and social support for freedom of association, the strength of social capital, trust in institutions, resource availability, and other markers of a favorable environment for independent collective action and the development of the nonprofit sector. The Values Surveys, currently carried out in 87 countries by the World Values Survey Association (a nonprofit association headquartered in Stockholm), documents a range of individuals' attitudes and actions, including membership of voluntary organizations, trust in other individuals and key social institutions, and how important it is to them to live in a democratic society (World Values Survey, 2013). One of the products of the Values Survey is a cultural map that clusters countries according to the correlation of two key social dimensions: whether their societies adhere more to religious-traditional values or to secular-rational values and whether the population focuses more on survival or self-expression (a substitute for level of economic development; World Values Survey, 2011). In addition to the World Values Survey, regional studies, such as the European Values Study (European Values Study, 2011) and the European Social Survey (European Social Survey, 2013), document similar sets of social and cultural determinants.

The Edelman Trust Barometer measures the public's trust in business, government, nongovernmental organizations (NGOs), and media (these are the terms used by the Edelman researchers) in 25 countries. Globally, NGOs are the most trusted institutions, with 58% of the "informed public" in 2012 indicating that they trust that NGOs "do what is right" (compared to 53% who say the same about business, 52% about media, and 43% about government; Edelman Trust Barometer, 2012). Trust in all institutions varies considerably between the countries surveyed, but most significantly, trust in NGOs has increased dramatically in emerging countries, such as China and India.

Numerous indicators and indexes focus on key concepts such as *development*, *freedom*, *peace*, *prosperity*, and *stability*, which are predictors of the enabling conditions for nonprofits. These include the Fragile States Index, the Freedom in the World survey, the Global Peace Index, the Human Development Index, the Prosperity Index, the Corruption Perceptions Index, the World Development Report, the World Development Indicators database, the Worldwide Governance Indicators, and the Cingranelli-Richards Human Rights Data Project.

Given the key role of faith-based organizations in the nonprofit sector, studies on religious freedom and related activities are another useful source for data. The Association of Religion Data Archives has regional and national data on faith-related activities. These data are aggregated from a number of sources, including the Center for Religious Freedom at the Hudson Institute. The question of the role of faith-based organizations and their effect in our understanding of the differences in the size and scope of nonprofit sectors around the world has yet to be fully explored at an international comparative level. Much of the work associated with the nonprofit sector is carried out by faith-based organizations, either directly or in the guise of faith-related nonprofits. In countries where there is a state-sponsored religion, the organizations associated with that faith will occupy much of the social and economic spaces that are occupied by more independent, secular nonprofits in other countries, but there appear to be no studies that quantify the extent of the crowding out or competition between

faith-based and secular organizations. It has been documented that a large portion of all philanthropy goes to faith-based organizations (in the United States and Australia, where statistics on giving are divided by sector, approximately one third of all private donations go to religious organizations), but there appear to be no reliable statistics on what goes to purely faith-related purposes as opposed to more secular social service.

Cultural Frames

The quantitative and qualitative data in the research projects and indexes outlined in the previous sections can be used to trace the contours of cultural frames that represent the archetypes of the current dynamics of national nonprofit sectors operating under different economic, political, and social regimes. However, given the challenges and caveats of comparative studies, any attempt at tracing these frames, and locating specific countries within them, continues to be as much an art as a science, relying partially on the subjective assessments of researchers. The frames presented in this article are similar to those based on welfare regimes (Anheier, 2004; K. Brown & Kenny, 2000; Esping-Andersen, 1990) and to the patterns and clusters that emerged from the Johns Hopkins study (Salamon, 2010; Salamon & Wojciech Sokolowski, 2010), but they also seek to incorporate contemporary political and social dynamics that are reshaping and transcending earlier categories.

The frames are not strict templates, but instead represent patterns of development of the nonprofit sectors and their relationships with government and the business sectors. Nor is there a clear separation between the frames: There are overlaps and certain convergence, and some of the purported differences, which are often based on prevailing historical and cultural narratives, may not necessarily be supported by other research data. Baldwin (2009) draws on available statistical and survey data to argue that despite popular narratives of the cultural and social gulf between Europe and the United States, they are much alike on an array of metrics, including key civil society markers, such as trust in government and volunteering.

The frames described next can be represented graphically by focusing on two key interrelated continuums: (i) the relative dominance of the state versus civil society and (ii) the level of economic development of the country. The state versus civil society continuum reflects the political and social environmental history of each country as well as the quantitative and qualitative research projects cited in this article, whereas economic development is measured by gross national income (GNI) per capita (the standard used by the World Bank to classify countries as high, middle, or low income). Using these two continuums, the general contours of the frames and the relationship between them can be mapped (see Figure 5).

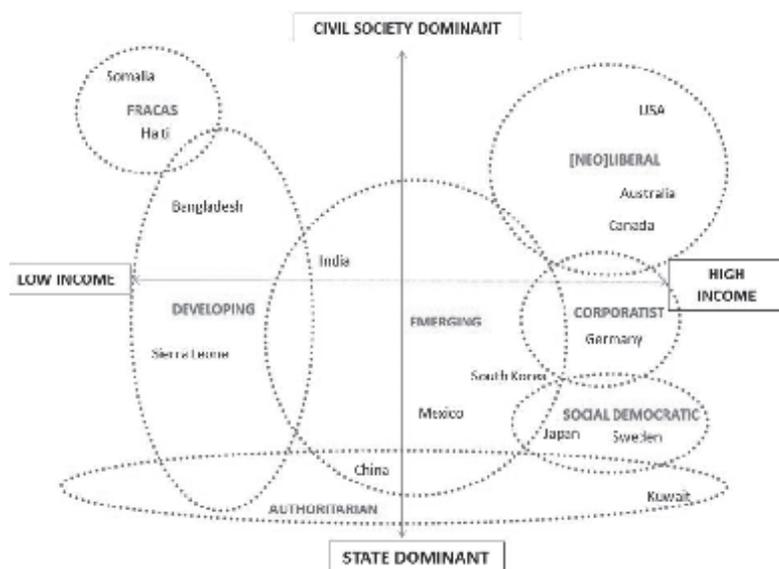


Figure 5. The nonprofit sector cultural frames. From *The Nonprofit World: Civil Society and the Rise of the Nonprofit Sector* (p. 114), by J. Casey, 2016, Boulder, CO: Kumarian Press, Lynne Rienner Publishers.

Figure 5 includes a cultural frame FRACAS (fragile and conflict-affected states) that describes a small group of the least developed countries in which government institutions function only marginally and are unable to control or provide services to their entire territory. The country may be divided between warring factions, and the few formal service delivery structures are often controlled by militia groups. Depending on the security situation, there may be a significant presence of peacekeeping operations and of disaster relief and humanitarian organizations (including UN, regional multi-lateral entities, such as the African Union and international nonprofit emergency aid organizations) operating mostly independently from the government. These FRACAS countries provide outlier examples of a distorted form of civil society. The existence of the FRACAS frame is important to acknowledge, but it is not directly discussed below, because it involves processes of state reconstruction and international statecraft generally outside the scope of discussions of a nonprofit sector.

Applying the terms *nonprofit sector* or *civil society* to the configurations of social and political structures in failed states and in authoritarian and emerging countries again highlights the definitional challenges and the use of exogenous Northern frameworks. However, there is a clear tendency to describe the diversity of dynamics using the same evolving globalized nomenclature in a range of countries, developing and developed. For example, among the documentation about the sector in Malaysia, a 1973 monograph titled *Blood, Believer, and Brother: The Development of Voluntary Associations in Malaysia* focuses on kinship networks, trade associations, and guilds (Douglas & Pedersen, 1973). A 2003 book focusing on essentially the same set of organizations is titled *Social Movements in Malaysia: From Moral Communities to NGOs*, and the authors noted, “While the specific shape of many contemporary NGOs may be new, they often build on a long history of social networks and associations” (Weiss & Hassan, 2003, p. 1). In the 2011 article “The Limits of Civil Society in Democratising the State: The Malaysian Case,” the author notes that Malaysian civil society organizations “come in a confusing array of manifestations, from academic and professional groups to grassroots groups, business-oriented groups, charity organizations, and, most of all, ethnic and religious groups” (Farouk, 2011, p. 105). The same semantic shifts can be found in the documentation of any of the countries described in the frames below.

The descriptions of the frames minimize reference to race, religion, and region, even though previous analyses of nonprofit sectors around the world have generally included categories based directly on such factors. Schak and Hudson (2003) posited the existence of an Asian model based on the Confucian concepts of morally binding loyalty, piety, and etiquette, which have been translated into social contracts that lead to greater subservience to the authority of the state. Some typologies often included a separate category for Islamic countries based on the charity pillars fundamental to the practice of Islam. The broad category of developing countries is often broken down into regions, such as Latin America, where the Catholic Church has played such a dominant role, and Africa, where the legacy of colonialism and exploitation have entrenched underdevelopment and where nearly all of the frail and conflict-affected states are clustered. The work of nonprofit researchers who use such cultural-religious categories is buttressed by broader social research, such as the World Values Survey (2011).

However, although it is essential to document and analyze regional, religious, and cultural influences, they are increasingly less relevant as the defining features of typologies. The groundbreaking comparative work of McCarthy et al. (1992) was completed over 20 years ago, yet to read about categories based on the formerly communist Eastern Europe, Islam, and regional groups is somewhat jarring in a swiftly changing world. Much of Eastern Europe is now part of the European Union; South Korea has firmly taken its place among high-income aid donor nations; African countries such as Botswana, Ghana, and South Africa appear to have consolidated their democratic institutions and are rapidly developing; other African nations have more in common with the situation in some nations in the Pacific Islands region; and Cuba, and also increasingly Venezuela and Nicaragua, share the state-centric tics of some Asian and African regimes. This article was written while the Arab Spring was unfolding, and the outcomes of those events will take years to evaluate, but given the differences that have

already emerged between the countries caught up in the upheavals, any doubts about whether to include an Arabic category were definitively put to rest. Any categorizations of the nonprofit sector and the activities of its organizations are increasingly cross-cultural and cross-regional. In the following sections, the cultural frames in Figure 5 are described in detail.

(Neo)Liberal

Although the label *liberal* is often used, particularly in the United States, as a synonym of progressive, the term is used here as a descriptor for the nonprofit sector in the traditional sense of classic pluralist liberalism, which espouses freedom of speech and association and limited government (the latter generally regarded as a more conservative agenda). In contemporary discourse, particularly by European commentators, classic liberalism is also often referred to as neoliberalism to signify the late 20th century resurgence of ideologies that seek a reduction in the size and scope of government, focusing particularly on competitive market principles and outsourcing.

Countries in the liberal frame have a long tradition of individual freedoms, independent associational life, and less centralized government. In the current context, they are now also characterized by strong nonprofit sectors that represent a significant proportion of national economic activity. The frame is generally correlated with industrialized English-speaking countries, which have in common historical-political pluralist arrangements that encourage independent associational life and self-organizing, cultural norms that promote philanthropy and voluntary action and a range of more recent institutional arrangements that seek to consolidate and expand the nonprofit sector. The United States is the emblematic (neo)liberal country with a long history of smaller government and strong nonprofits, whereas others, such as Australia, Canada, and the United Kingdom, have combined liberalism with the development of stronger welfare state provisions in the early to mid-20th century.

Since the 1970s, the nonprofit sectors in all these countries have grown considerably. The widespread effects of public sector reforms since the 1980s, based on new public management and governance approaches, have made contracting out, consultation, and coproduction central organizing principles in liberal frame countries. There is considerable government funding of nonprofit organizations but also relatively high levels of private philanthropy and volunteering as well as extensive entrepreneurial activities resulting in significant earned income for some organizations. The management of larger nonprofits is increasingly professionalized and entrepreneurial, and there is significant emphasis on service delivery over expressive functions, with the latter increasingly corralled into the work of a small group of nonprofits that openly identify as advocacy organizations. Advocacy relationships with government are based on perceived strength of the nonprofit sector and its capacity to mobilize the will of the wider population, but they are also mediated by the density of the new institutional relationships between governments and nonprofits created by extensive consultative and contracting processes.

Social Democratic

In the social democratic frame, the state takes the primary responsibility to finance and deliver social, educational, and health services through high levels of taxation and public spending. This is the model that for much of the 20th century has characterized the Scandinavian countries, most emblematically Sweden, which has a level of public spending that represents some 52.5% of GDP (compared to 38.9% in the United States), supported by a higher taxation burden (47.9% vs. 26.9% in the United States).

The outcomes expected from a larger government sector are also reflected in the expectations of other economic sectors, including commercial enterprises. The social economy of cooperatives and mutual organizations has played a larger role than in liberal frame countries, labor unions have maintained high membership relative to other industrialized democracies, and corporate social responsibility has been more ingrained as standard business practice. Social outcomes such as universal health care, accessible public education, and the greater equality of women—typical policy and programmatic goals of nonprofits in other countries—are achieved through a range of government-led policies and programs and labor market mechanisms. Instead of the more competition-based market economy of liberal countries, the reference here is a social market economy that seeks to limit inequalities and deliver more universal welfare.

Because the state is more dominant, there are relatively few service delivery nonprofit organizations and only a restricted number of volunteers engaged in service delivery. However, the nonprofit sectors in social democratic countries are still large numerically and play a significant role in social, political, and economic life. The nonprofit sector in Scandinavia has a long tradition in religious charity and progressive social movements, which led to the emergence of the welfare state from the 1930s, and the assumption by the state of core service provision. These are affluent societies, and the population has significant surplus income and time. There is an expansive network of small volunteer-based, member-serving organizations that have self-organizing and expressive functions as central principles. There is a high level of volunteering, but it is focused on advocacy, professional associations, and sports and recreation organizations, and a significant portion of the income of these organizations is fee for services. There has also been a strong international aid subsector as private donations to charitable activities generally have had an external focus.

In the last decades, however, there has also been a significant rolling back of the role of the state in social democratic countries. What for most of the 20th century had been conceptualized as an advocacy and member-oriented “popular movement sphere” is being reconceptualized as a sector that also collaborates with the state in service delivery (Reuter, Wijkström, & von Essen, 2012). Privatization of government services in areas such as health, education, and welfare is still relatively modest compared with other industrialized countries, and new contracting processes include the commercial sector as much as the nonprofit sector. There appears to be an assumption that the traditional nonprofit sector does not have a particular interest in assuming a service role and that nonprofits generally do not have the capacity or skill base needed for managing larger scale service delivery (Pestoff, 2009).

Corporatist

In the most general sense, the term *corporatist* describes a society in which the state, as the central actor in a strict hierarchy of power relations, apports certain roles to other major actors. Strictly speaking, therefore, the social democratic countries identified in the previous frame are also corporatist (as are the authoritarian countries described below). However, for the purposes of this taxonomy, corporatist refers to democratic countries in which there are historical partnerships that involve the devolution and delegation of legal and administrative responsibility for social service delivery to a set of intermediary nonprofit conglomerates, primarily based on faith-based organizations and labor unions. Although these nonprofit organizations are separate from government, the long-standing institutional arrangements blur the distinctions, and their work is embedded into the dynamics of the social market economy and the welfare state. The government raises the revenue or creates processes that institutionalize revenue generation (e.g., compulsory salary deductions to pay for health and pension benefits), but it is a small number of key nonprofits, entrenched in the welfare state apparatus, that manage and deliver the services.

This frame refers primarily to Continental European countries such as Germany and Belgium. These countries have nongovernment sectors based on ideological-religious divisions and have developed stable collaborative links between government and a few selected NGOs through the principle of subsidiarity. Their nonprofit sectors are large in terms of economic activity and employment, but are relatively small in number with a few dominant service providers supported by tax revenues that flow through the historical corporatist arrangements. The vertical integration dynamics, often referred to as pillarization, are also reflected in decision-making and social action structures that link political parties with mass organizations such as unions and associations.

Some authors have suggested that there has been a convergence between U.S. and European interest mediation, and already in the early 1990s, some declared that “corporatism is dead” (Richardson, 1993). Streek and Schmitter (1986) and Thomas (1993) suggested that Europe was witnessing changes in social structures and political systems that undermined corporatism and that processes of intermediation were moving toward a U.S.-like pattern of disjointed pluralism because of increased differentiation of social structures and collective interests as well as because of market instability and technological shifts. But despite such shifts, the traditional corporatist structures have persisted and continue to play a central role in policy making and service delivery, even though the last decades have seen an increasing use of competitive bidding for services and the diversification of the nonprofit sector.

Emerging

This frame brings together countries that have in the last decades experienced a relatively peaceful transition to democracy and have established relatively stable and solid economies. The word *relatively* is key here, because some countries have had considerable civil unrest and violence, and thus democratic institutions and rule of law have not fully consolidated and their economies are not yet on solid footings. This frame may include the postsocialist countries of Central and Eastern Europe and Eurasia, the postmilitary dictatorships of Central and South America, as well as postauthoritar-

ian regimes in Africa and Asia. The Arab Spring was seen as potentially propelling a number of Middle East countries into this category, but that is still a work in progress.

The civil society discourse has been a central analytical concept in commentary on the transitions. Civil society organizations, in their broadest definition that may include clandestine labor unions and dissident citizens' organizations, have been identified as key actors in forcing political change. Once a transition occurs, there is often a sudden influx of Western nonprofits (some of which may have already been supporting dissidents under the previous regime), working alone or with local partners, and a sweeping restructure of autochthonous organizations. The government-sponsored mass movement social and professional organizations that existed under the old regime either convert to more democratic operations or disappear, former dissident and clandestine organizations legalize, and new organizations quickly appear (this may include the revival of historic organizations suppressed by the authoritarian regimes). Some of these organizations eventually transform into full-fledged political parties and focus their energies on electoral politics, but others become independent nonprofits with the relevant enabling legislation being enacted under new democratic governments. The emerging civil society organizations are generally seen as an antidote against the return of past tyrannies.

Once organizations interested in electoral politics have reestablished themselves as political parties, the remaining nonprofit sector is often dominated by cultural, recreational, and professional associations, the realm of organizations typically encouraged under authoritarian regimes. The conversion of organizations that existed under the old regime presents a considerable challenge—a lawyers' association that was previously dominated by loyal regime cadres whose role was to ensure that the legal profession remained subservient to authorities must now become an independent organization defending the rights of members and acting as a watchdog for the rule of law.

There is often a significant initial surge of new organizations created in the new climate of entrepreneurial fervor. However, many prove to be unsustainable as the development of independent nongovernmental action is fragile and often tainted by the legacy of mass movement associations under previous authoritarian regimes and by corruption in the new organizations (Taylor et al., 2009). Nonprofits in transitional countries generally play a crucial role in advancing democracy and providing essential services, but there are also often considerable concerns about corruption and rent-seeking. In one Eastern European country, many nonprofits appeared in the 1990s whose only apparent assets were foreign luxury automobiles because a tax loophole allowed nonprofits to import them without the steep duties payable by individuals or for-profit firms. The initial posttransition surge in nonprofit numbers quickly reaches a peak and is often followed by a steep drop as unsustainable organizations fold and questionable ones are closed by the authorities.

The emerging nonprofit sector often survives precariously on the margins, caught in a complicated dance of relationships with government authorities. The first new organizations may be under the auspices of political parties, unions, and religious organizations and must sustain themselves in a social context that has low levels of giving and volunteering by a population more focused on its own sustenance. The service functions of the nonprofit sector expand as funding becomes available either through foreign donors or from the new governments that may increasingly encourage their

activities and begin to contract with the sector, but expressive functions are more contested. As transitions consolidate, many organizations face funding shortages because foreign donors withdraw and shift their focus to the latest zones of instability and conflict.

With regime change, former opposition activists generally move into the corridors of power. Once they are part of the new government institutions, they often regard independent organizations with considerable suspicion as the refuges of disloyal former comrades or of disgruntled members of the past regime (and this is sometimes indeed an apt description of the new organizations that emerge). New nonprofits may be accused of acting as an illegal opposition or of corrupt behavior, and yesterday's activist heroes now working in these organizations are soon recast as today's villains. The distinction between *nongovernment* and *antigovernment* may become blurred, particularly when political tensions rise. The participation of civil society organizations in regime changes around the world in the last decades has fueled a backlash from many governments, particularly those sliding back toward authoritarian tendencies, and there is significant wariness of what is commonly characterized as foreign influence on internal issues (Rutzen, 2015). Nonprofit organizations focusing on advocacy and watchdog activities often work at considerable personal peril to those involved—the all too frequent harassment and even murders of human rights activists and nonprofit social service workers are sad testament to the dangers they face.

Tensions can arise between a top-down externally fostered sector and a bottom-up indigenous recovery of historical organizations and development of new local organizations. As transitions consolidate, foreign governments, aid organizations, and individual nonprofits take an active role in developing civil society organizations. Government-sponsored aid, such as the European Union's PHARE, LIEN, and TACIS programs for funding civil society in Central and Eastern Europe in the post-1989 transitions, and nonprofit democracy projects, such as the Open Society Foundations and CIVICUS, are joined by individual nonprofit organizations from other countries that seek to reproduce their work in this new fertile ground. The more benevolent view is that this intervention seeks to aid local citizens to build capacity for collective action and stabilize democratic institutions, but critics see more nefarious agendas of intentions to implant capitalism or to serve the other interests of external funders (Abzug & Webb, 1996; Wallace, 2003).

The outcomes of transitions have been mixed (for reasons rarely determined by the nonprofit sector). Central and Eastern European countries have joined the European Union, and Brazil has moved from the 20-year military dictatorship of the 1960s to the 1980s to its current status as a stable democracy with one of the fastest growing economies. However, other countries, such as some of the Eurasian former Soviet republics, have faced greater challenges and have slipped back into authoritarian habits and economic instability.

Developing

The preceding frames have focused on industrialized countries and those on the threshold. At the lower end of the economic scale are the low- and lower middle-income developing nations. The world's poorest countries are defined officially as having a low GDP per capita (in 2012 it was less than \$1,005 per capita in low-income countries and \$1,006–\$3,975 in lower middle income) as well as weak human assets (poor

health, low level of education, etc.) and a high degree of economic vulnerability. The poorest countries are often subject to widespread internal conflicts, suffer from extensive corruption, and lack political and social stability. Governments are often autocratic and split into opposing factions, with guerrillas or warlords controlling parts of the country. They are also often kleptocracies, in which oligarchs pillage the wealth of the country to fuel luxury lifestyles while the majority of the population lives in poverty. The state does not provide reliable public services or protect citizens, and any independent organizations that might threaten the hegemony of the elites are often violently repressed. Even in poor countries that operate with a more open, democratic regime, bourgeoisie elites dominate economic and political life (with a handful of prominent families controlling wealth and political patronage).

Many important grassroots efforts are seeking change, but they are often overwhelmed by wider economic forces and the direct repression by the despots in power. These countries usually have a long history of traditional collective structures and associational life as well as of colonial missionary and charity work, and in the last decades, they have witnessed the emergence of a professional nonprofit sector. The new nonprofits include foreign international nonprofits and autochthonous nonprofits that have been successful in tapping into international funding streams or creating alliances with international partners.

A significant facet of the sector in these countries is the substantial presence of foreign nonprofits and the dominant role of foreign funding to local organizations (Shivji, 2007). Workers in nonprofits funded from external sources are among the higher paid workers in the local labor markets. Foreign expatriates, whose salaries are generally benchmarked to their home country, enjoy a lifestyle on par with local elites, whereas locals with jobs in organizations funded from external sources are often among the fortunate minority that has a stable living wage from guaranteed sources. Unlike nonprofit employees in industrialized countries, who are usually at the lower end of the pay scale, those who work in nonprofit organizations in low-income countries are generally a privileged class. It is not unusual to find that local nonprofit employees are highly qualified professionals (engineers, lawyers, and academics) who take secondary employment in nonprofits, often significantly below their skill set, because they find that they earn more work as drivers, interpreters, or mid-level administrators on an internationally funded project than they would in their own profession. Many of the usual organizational hierarchies are also significantly different from those in industrialized countries, with the executive staff in international nonprofits being relatively young expatriates, often females, who may not speak the local language but rather rely on bilingual local staff as interlocutors. To develop a cadre of qualified professionals, universities in developing countries have experienced a boom in nonprofit studies that combines managerial and development issues (Mirabella, Gemelli, Malcolm, & Berger, 2007).

The political and social consequences of external funding and external pressure are often a source of friction. As international nonprofits have assured sources of their own income and are beholden more to their own members and contributors than to local authorities, questions of accountability and ownership of policies arise. Haiti is often presented as the prototypical case of a country in which NGOs have become

more powerful than the government through the donations they bring to the country and their subsequent capacity and power to influence policy and program agendas.

Given the weakness of governments in many developing countries and their lack of capacity to regulate nonprofits, other processes have been developed to oversee the involvement of international nonprofits. The UN has encouraged the development of policy documents that provide guidelines for operating nonprofits in different countries (e.g., see Government of Liberia, 2008). These policies in effect constitute the legal framework for regulating the activities of NGOs in the absence of local legislation.

International nonprofits seek to play a significant part in the economic development and democratization of a number of countries, but they face the reality that governments and opposition may be reticent about their activities (Roelofs, 2006). Suspicious and fearful governments are putting limits on nonprofit activities, and where there is unrest and insurgency, armed oppositions often target nonprofit aid workers because they see them as representing foreign interests by propping up the extant corrupt regime and imposing external values, habits, and systems that are at odds with local customs. Externally funded nonprofits are often seen as inhibiting the development of indigenous civil society and distracting from the development of more political organizations that could push for structural changes (Banks & Hulme, 2012; Taylor et al., 2009).

There is usually an extensive informal grassroots associational sector based on traditional family, clan, language group, caste, tribe, or village. As the new professional sector takes root, it often butts up against these extant social structures. In all countries, a tension exists between large corporate nonprofits and small grassroots organizations, but in developing countries there appears to be a particularly sharp divide between traditional collective structures and a newer generation of professionalized nonprofits funded by external donors and favored by local elites. The newer sector is generally in the hands of expatriates who have settled in the country or local elites who are able to operate more effectively in international environments (this is particularly evident where only a small educated minority speaks English or French, the most common languages in international organizations). They are commonly accused of claiming to represent the interests of poor and rural communities without really understanding their true needs and of treating them more as “stakeholder” recipients of largesse instead of “rights holders” who should determine program policies and strategies (Suleiman, 2013; Tanaka, 2010).

The divide between the grassroots and the elites is also evident in the existence of a small sector of cultural, educational, and health nonprofits created to meet the needs of the prosperous in the absence of government services. The best schools, hospitals, and cultural institutions in many developing countries are often constituted as nonprofits, but generally provide few services to the poor and disenfranchised.

Organizations in developing countries are also often based on the leadership and patronage of a powerful “Big Man” or other charismatic entrepreneurs who become the patriarchs (occasionally there are matriarchs) of dynastic structures that dominate many nonprofit organizations. They may have achieved their status through traditional ruling lineages or through guile and violence, but participation in organizations with ties to these individuals can be key to survival or sustenance in societies bedeviled by corruption and violence (Hyden, 2010).

The relationship between organized crime and nonprofits again becomes an issue because some criminal gangs operate services akin to nonprofits in the areas they control, and they may also use nonprofit organizations as fronts for their activities in an environment in which the state is unable to provide oversight or is riddled with corruption. Transparency can also be problematic. There may be few institutional structures to promote or oversee the transparency of organizations, whether public, private, or nonprofit, and there may be little infrastructure for gathering and disseminating material about the operations and finances of nonprofits. Transparency may even endanger workers, and in some countries nonprofits deliberately do not publicly declare their income, because it may make them more visible targets for extortion and theft.

Authoritarian

A final frame, which straddles the economic divide, is illiberal single-party, totalitarian, and authoritarian regimes in which political or social organizations not associated with the dominant regime (or dominant religion in the case of theocracies) are banned or allowed only limited participation. Although such regimes are clustered at the bottom end of the economic scale, some higher income countries also have authoritarian governments or are dominated by a single leader or party that curbs political freedoms. In the *Freedom in the World* report (Freedom House, 2011), 60 of the 194 countries studied were designated Partly Free (31% of the countries, or 22% of the global population) and 47 were Not Free (24% of the countries, or 35% of the global population—of which more than half live in China). In these countries, there are considerable institutional and informal barriers to the operations of independent nonprofits, both domestic and international, although international nonprofits may be given marginally more leeway within the strict constraints of the activities deemed acceptable to the regime.

The most autocratic, predatory, and extractive regimes use *hard power* repression, including the detention, torture, and murder of those considered a threat. The focus of repression is most directly on rivals, but it also usually includes watchdog organizations seeking to expose human rights violations or corruption and even includes social service, community development, or education organizations working outside the narrow parameters allowed by the regime. Criminal gangs and militias working for oligarchs may also be operating with relative impunity to target nonprofits seen as jeopardizing their interests. During armed conflict, militias may target service and aid nonprofits whose activities they regard as legitimating or propping up their opponents.

Developmental and distributary single-party regimes use *soft power* controls: barriers to registration, regulations on permitted activities, constraints on funding and income generation, as well as monitoring provisions that make the continued existence of the organization subject to the veto of the authorities (International Center for Not-for-Profit Law, 2013; Richter & Hatch, 2013). These go hand in hand with general laws that restrict the right of association and protest, control the press, and hinder transparency. The government has the right, or simply the power, to shut down organizations whose activities are no longer sanctioned and to detain recalcitrant holdouts. Attempts to maintain independent organizations are quickly met with pressures toward clientelism and co-optation, and those that do not conform are forced to act at the margins under constant vigilance and harassment. Service-focused nonprofits may be tolerated, or even encouraged, if they are seen as complementing government service provision

on approved issues, and advocacy and cultural organizations may also be permitted if they are seen as buoying the legitimacy of the regime and aiding in providing a voice in international forums.

The reluctance to open spaces for the work of nonprofits may also be based as much on models of economic growth as on political restrictions. A number of East Asian countries based their economic growth of the 1980s and 1990s on state-centric paternalist models that celebrated thrift, hard work, and duty to family and society and eschewed the creation of Western-style welfare states as superfluous to societies in which employers and family provided the safety net. Policy development was state controlled and attempts to provide independent services received little encouragement, resulting in restricted political or operational space for a nonprofit sector.

In many authoritarian and single-party regimes, government-sponsored organizations take on the form and use the language of nonprofits. These are most often mass movement, party-based organizations tightly controlled by the ruling regime, which usually focus on cultural and recreational activities, but also on charitable work. Typically, the wife of the president-dictator is the head of the national women's mass movement organization and a charity figurehead. Given the pervasive intrusion of authoritarian governments in their citizens' lives, there is much less distinction between the public and private, and many social and economic privileges are typically dependent on membership in such organizations, although they are formally voluntary. The politics of language play an important role, with authoritarian-minded regimes adopting variants of democratic terminology, such as the *realistic democracy* and *state democracy*, to describe their rule and to legitimize the organizations it engenders.

Many authoritarian countries have nonprofit sectors in exile. Those who fled the regime and have found refuge in democratic countries form solidarity committees, often in conjunction with local activists in the host countries. These committees usually have the overtly political goal of regime change in their country of origin, but they often also maintain aid and cultural exchange activities that link the country of exile with their homeland. The refugees in exile are schooled in the nonprofit sector and regulatory regime of the host country and often take that orientation back with them when a transition establishes a more pluralistic system that permits return.

Moving Between the Frames

The comparative research projects and the narratives of the cultural frames are essential tools for understanding the nonprofit sector in any country. In Figure 5, the frames were mapped using national income levels and the relative role of the state and civil society. They can also be summarized using key elements of the economic, political, regulatory, and social parameters that affect the nonprofit sector in each frame (Table 4).

Table 4*The Key Parameters of the Cultural Frames*

Frame	Economic parameters	Political parameters	Regulatory parameters	Social parameters
Liberal	High Income	Democratic, pluralist. High level of contracting of public services to nonprofits. Philanthropic provision of collective goods and services supplement lower level of government services.	Low barriers to sector entry. High tax incentives for charitable donations by individuals and corporations.	Strong culture of philanthropy and high trust in nonprofits.
Corporatist	High Income	Democratic corporatist. Dominated by subsidiary and pillarized and relations between political and social actors.	Low barriers to sector entry. Tax incentives for donations by individuals, but more restricted incentives for corporations	Long history of philanthropy and cooperative structures. Taxation burden constrains philanthropic culture. High participation in expressive and recreational nonprofits.
Social Democratic	High Income	Democratic, state-centered social-democrat. State dominates delivery of public services and collective goods.	Low barriers to sector entry. Limited incentives for donations for individuals and corporations.	Welfare state and taxation burden constrain philanthropic culture. High participation in expressive and recreational nonprofits. Philanthropy often focused on international causes.
Emerging	Middle Income	Democratic, incomplete transition to liberal, corporatist, or social democratic models.	Recently established processes for sector entry and incentives for donations according to emerging model. Limited capacity to enforce regulations.	Small but growing nonprofit sector. Growing local philanthropy, but low trust in nonprofit capacity, and concerns about corruption. Instability if there is withdrawal of international funding.
Developing	Low Income	Democratic or semi-authoritarian. Low level of public services, many supported by international aid and philanthropy and implemented by international nonprofits.	Medium to high barriers to incorporation of indigenous organizations. Oversight of operations of foreign nonprofits. Limited capacity to enforce regulations.	High incidence of funding by foreign donations. Tension between indigenous and international nonprofits. Low trust in all public and nonprofit institutions, concerns about corruption.
Authoritarian	Low, Middle, or High Income	Single-party, authoritarian.	Limited rights of association and assembly. High barriers to incorporation of independent organizations. Nonprofits restricted to “nonpolitical” activities.	Membership in regime-sponsored organizations confirms allegiance to hegemonic party. May have dissident nonprofit sector in exile.

The frames are not immutable. All nonprofit sectors are in constant evolution, in their metrics and in how they are perceived by researchers and the public. This evolution may be the result of incremental changes in the factors that determine the national scripts or may be marked by sudden shifts. Kim and Hwang (2002) described three stages of evolution of the nonprofit sector in South Korea since the end of the Korean War. These stages may be unique to that country, but also reflect the shifts in many others that have experienced regime change and economic growth:

- In the first stage, until the early 1960s, the primary goal of the state was to maintain national security. Nonprofit organizations were service oriented, providing welfare services or implementing development projects for the poor, and were mostly established and supported by foreign aid. Korean society was still agrarian, and community, religious, and ancestral associations were popular.
- The second stage began with the 1961 military coup and was characterized by an authoritarian developmental state. Independent civil activity was permitted only within a limited political space, but there was also rapid economic growth. Three distinct subsectors of organizations emerged: (a) Government-sponsored social organizations mobilized the population for national development and to publicize government policies; (b) nonpolitical education and service-oriented organizations began to play a significant role in providing public goods and social services; (c) underground student activities and political opposition groups agitated against the regime, but were severely oppressed.
- The third stage began with the end of the authoritarian regime in June 1987. The dramatic rise of citizen and labor movements and other nonprofits during the immediate postdemocratization period added important new players. The earlier leader groups, such as student organizations and underground groups, were gradually replaced by new organizations. The decade of the 1990s is considered by many as “the age of civil society.”

The nonprofit sector in Korea has now grown into a highly visible and independent element in Korean society, with a range of service and expressive organizations. The growing wealth of the population and diaspora philanthropy (donations from Korean emigrants abroad) have contributed to the establishment of a considerable donor base that supports domestic and international activities.

Conclusion

There has been a worldwide expansion of the nonprofit sector. In countries with a longer tradition of an active nonprofit sector, a significant growth spurt has occurred in the last decades; in countries where independent nonprofits have in the past been largely absent, there is clear evidence of the emergence of a growing and newly confident sector seeking wider legitimacy.

Each country is unique, subject to the path dependency generated by its national historical baggage, by contemporary institutional transformations, and by the personal dynamics of key policy entrepreneurs or champions. But, decontextualized, the rhetorics and processes of change in countries around the world seem remarkably similar,

with a marked convergence in discourses. There is a common international trend toward an increased capacity of the population for independent organizing and action, changing public expectations of the role of nonprofits, a policy shift to governance and partnership approaches that involve third-party arrangements and the privatization of the public sector, the increasing commercialization and marketization of the work of nonprofits, and the increasing professionalization of an elite segment of the nonprofit sector.

At the same time, many regimes continue to erect significant institutional barriers to contain and channel the expansion of nonprofits, and they occasionally resort to hard power repression against nonprofits seen as threats to state power. The Carnegie Endowment for International Peace reports a “viral-like spread” of new laws restricting foreign funding for domestic nonprofit and a shrinking of the political space for independent civil society (Carothers & Brechenmacher, 2014, p. 1). Transitional and emerging countries have witnessed a growth in a range of nonprofits, but they are also the epicenters of an “associational counterrevolution” as governments tighten restrictions on foreign funding and seek to constrain any domestic operations perceived as threats to the current regime (Rutzen, 2015).

What is known about the nonprofit sectors in different countries is informed by a growing body of research. Numerous international research projects, many working with local collaborators, have generated substantial literature. This patchwork of literature provides considerable insight to the evolution of the nonprofits, but all the research projects are subject to observational and measurement errors. The cultural frames presented in this article provide a useful framework for studying nonprofit sectors around the world. But they should be used with caution and caveats. Any one country may have elements of different frames, and it is certainly likely to have a dynamic nonprofit sector that is moving between the frames.

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